

0970-0085 - Attachment 2
Controlling Order

#	Submitted By	Form	Comment	Category	Common	Comments/Notes
1	State	Notice of Determination of Controlling Order	#5: Recommend breakdown of arrears to show: (1) principle balance, (2) interest; and (3) total.	Change	Arrears	We disagree with this comment. The breakdown of arrears will be on the order.
2	State	Notice of Determination of Controlling Order	In the heading of the form, we believe there should be an option labeled "This request or information sent through CSENET". This option is included on the Transmittal. The Instructions to this form provide that CSENet transactions are the recommended method for sending information to another state.	Addition	CSENet	We disagree with this comment. We have revised the instruction box to read: The following options are available for making IV-D requests and sending information on IV-D cases: 1. CSENet transactions are the recommended method for making requests or sending information to another state. If CSENet is not listed as an option on the form, then it cannot be used to convey any of the requests for information or IV-D requests provided on the form. Supporting documentation should be sent through EDE, whenever possible. If certified copies are needed, hard copies should also be sent by mail. Mail or fax may also be used for all documents when EDE is not available. 2. If CSENet transactions are not available in your state, EDE is the next preferred method for transmitting your request or information. Both your state and the receiving state must be using the EDE application to use this communication method. 3. If the EDE application is not available in your state or the receiving state, then mail or fax must be used to communicate your request.
3	State	Notice of Determination of Controlling Order	The second box on page 2 of the Notice of Determination of Controlling Order Instructions tells states that CSENet is the recommended method of sending information. However, since this form is filed with the courts, all states need the original form. We suggest that the instructions not identify CSENet as the preferred method of communication for this form.	Change	CSENet	We disagree with this comment. See Comment #2 for instruction revisions.
4	State	Notice of Determination of Controlling Order	Since the use of this form should be rare under UIFSA and to clarify this for all as we believe confusion still exists, we propose a statement be added to the beginning of this form. Something similar to the Rationale statement on the OCSE Draft cover page would suffice. "UIFSA includes provisions to ensure that there is only one valid order between the parties that controls the amount of current support due, the need for a determination of controlling order should be rare."	Addition		We disagree with this comment. The Notice of Determination of Controlling Order is not a request to make a determination of controlling order; it is a document that lets other jurisdictions know the results of the tribunal's controlling order determination. Training issue.

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5	State	Notice of Determination of Controlling Order	Just above Section I, need to have language amended for "Neither the obligor, the individual obligee, nor the child(ren) reside in the order-issuing state." If obligor remains in issuing state and CP/children open here/request services, we need re-direct to DE. As is, based on language of Section I, this form should only be used when all parties have left the originating state.	Change		We disagree with this comment. The Notice of Determination of Controlling Order is not a request to make a determination of controlling order; it is a document that lets other jurisdictions know the results of the tribunal's controlling order determination. Training issue.
6	State	Notice of Determination of Controlling Order	Item 3 contains the word "initial" which indicates there is a "subsequent" controlling order. State suggests the word "initial" be removed.	Change		Thank you for your comment. The word "initial" was there because Section 611 of UIFSA provides "In a proceeding to modify a child-support order, the law of the state that is determined to have issued the initial controlling order governs the duration of the obligation of support." However, to avoid any confusion we have removed the word "initial" from the form. Keep in mind that even if the controlling order is subsequently modified, it is still the duration of that initially determined controlling order that governs. As noted in the instruction, that state's law "permanently governs the duration of the support obligation." Training Issue

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Declaration in Support of Establishing Parentage

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1	Organization	Declaration in Support of Establishing Parentage	I. Declaration 1. adoptive parents should be recognized as an option and adoptive parents and non-bio parents should have <u>[explain in section IV and attach documentation]; [] Other should state [caretaker] and "(explain relationship in section IV to the child and attach documentation)"</u>	Addition Change	Adoption	We disagree with this comment. Adoptive parents are legal parents and would not use this form. Also, we do not believe that nonbiological parents need to provide an explanation or documentation of the relationship. The checkbox for "Other" includes caretaker and the instructions already require an explanation in section IV. The instructions state, "If you are not a parent of the child, check "Other" and explain your relationship to the child in section IV. For example, you may be a relative or caretaker of the child." Also, we do not believe it is necessary for a caretaker to provide documentation of the relationship to the child.
2	State	Declaration in Support of Establishing Parentage	Instructions Page 2: Declarant information explanatory parenthesis states that only a parent can complete this form. However, item 1 includes a checkbox for "other" to have completed this form. Instructions need to be changed to not exclude caretakers or relatives of the child.	Change - I	Caretakers	We disagree with this comment. The Instructions do not state that only a parent can complete the form. The Instructions provide that the Declaration must either be completed by a parent or completed with information provided by the parent. The Instructions further direct that whoever is completing the Declaration must provide his or her name. However, we will add a sentence to the Instructions stating that a person should complete the form to the extent that he or she has information.
3	State	Declaration in Support of Establishing Parentage	In the Instructions, page 1, last italicized text box, the labels "IV-D case identifier" and "tribunal number" are not consistent with the corresponding labels on the form, which include "Responding IV-D Case Identifier", "Initiating IV-D Case Identifier", "Responding Tribunal Number", and "Initiating Tribunal Number". For clarity purposes, we believe the labels used in the instructions should be verbatim with the labels used in the form.	Consistency	Case Identifier	We agree with this comment. The Instructions for the form will be revised to mirror the language used on the form.
4	State	Declaration in Support of Establishing Parentage	Under I. Declaration, in the "Where child was conceived" box, please add "country" within the parentheses. Even though the Instructions say to add the country, it is more likely to be read in the document itself.	Addition	Conception	We disagree with this comment. Because these cases are sufficiently rare, we do not believe "country" should be added to the form and instead have addressed "country" in the instructions. By putting it on the form, people may think they need to add USA in addition to city and state.

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5	State	Declaration in Support of Establishing Parentage	In the heading of the Declaration, we believe there should be an option labeled "This request or information sent through CSENET". This option is included on the Transmittal 1. The Instructions to the Declaration provide that CSENet transactions are the recommended method for sending information to another state.	Addition	CSENet	We disagree with this comment. There is no CSENet transaction to support this form. We have modified the Instructions on all the forms to say: "CSENet transactions are the recommended method for making requests or sending information to another state. If CSENet is not listed as an option on the form, then it cannot be used to convey any of the requests for information or IV-D requests provided on the form. Supporting documentation should be sent through EDE, whenever possible. If certified copies are needed, hard copies should also be sent by mail. Mail or fax may also be used for all documents when EDE is not available."
6	State	Declaration in Support of Establishing Parentage	Declaration Section - Remove the floating "E" above Encryption Requirements.	Change	Extra E	We agree with this comment. We have corrected this formatting error.
7	State	Declaration in Support of Establishing Parentage	#1 Section 1. Declaration - We suggest the possibility of adding to the Gender field the selection of "Transgender" or "Other" to meet today's societal needs. #2 We suggest adding country to the where the child was conceived field. #3 We agree with the addition of questions #3 and 4 in this section which asks if parent is biological or nonbiological. The form now affords the opportunity to provide information if the child was conceived via alternative methods which reflects the societal changes in family structures.	Addition	Gender	#1. We disagree with this comment. However we recognize that gender can be something other than "male" and "female". We have added an option for "other" and modified the instructions as follows: "Gender is defined as "male", "female", or "other". Select "other" if the person does not identify with "male" or "female"." #2. We disagree with this comment. Because these cases are sufficiently rare, we do not believe "country" should be added to the form and instead have addressed "country" in the instructions. By putting it on the form, people may think they need to add USA in addition to city and state. #3. Thank you for your comment.
8	State	Declaration in Support of Establishing Parentage	In Section I, Declaration, we suggest replacing the two existing gender fields with one gender field immediately under the person's name.	Change	Gender	We disagree with the comment. We think the current formatting is sufficiently clear. Also see response to the first comment in comment #7.
9	State	Declaration in Support of Establishing Parentage	State seeks an explanation as to why the gender of the party completing the Declaration is requested. We do not know how we would use this information so we would appreciate some guidance since the instructions don't address why this information is requested. Suggestion: If the information is needed, we suggest the label say "My Gender." Some were concerned the party filling out the form might think the form is asking for the gender of the child.	Change	Gender	We disagree with the suggestion. Because of the location of the checkbox, we think it is clear that the form is seeking information about the gender of the parent. Agencies and tribunals have reported that information about gender is useful.

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10	State	Declaration in Support of Establishing Parentage	Good to see we are addressing gender neutrality; however we are concerned that our culture and laws have not yet caught up to these multiple parentage variations in a way that would make this form comprehensible to CS professionals, let alone participants. This form concept may be too ambitious for 2015.	Comment - Concern	Gender Neutrality Culture and Laws	Thank you for your comment. We believe that the revised form will assist states in receiving the information they need to establish parentage in different types of situations. The responding jurisdiction will use this information, as applicable, in applying its own laws.
11	Organization	Declaration in Support of Establishing Parentage	We respectfully request that OCSE not change the focus of the current form in use. There are too many unanswered questions regarding what legal and relationship information will be needed to support the establishment of legal parentage of a child of same sex parents. Due to this, the existing form to support establishment of paternity when the parents are a man and a woman should not be revised to attempt to address the same sex situations. Until the courts and state legislators address the issue of presuming or proving legal parentage between same sex parents, the creation of a new form anticipating this purpose would be speculative and convoluted. As the issues of same sex marriage and adoption are resolved by the States, new and/or additional forms will certainly be important. Leave the existing form to address establishment of paternity, not parentage.	Comment - Concern	Gender Neutrality Culture and Laws	We disagree with the comment. See response to comment #11.
12	Organization	Declaration in Support of Establishing Parentage	Currently some states provide legal avenues to create a parentage relationship for same sex couples (for example, adoption) . As laws evolve nationally and in states, a separate affidavit to establish parentage when the potential parents are both women and another one when they are both men should be considered.	Comment - Concern	Gender Neutrality Culture and Laws	We disagree with the comment. See response to comment #11.
13	State	Declaration in Support of Establishing Parentage	Suggestion: Use inclusive terminology such as: #1 "My self-identified gender is" with options for <input type="checkbox"/> Female <input type="checkbox"/> Male <input type="checkbox"/> Other #2 Below is a suggested format change which would address some of these issues. (Check whether you are the biological or non-biological parent of the child or, if neither, check "other" and explain your relationship to the child in section IV. A non-biological parent may be the same-sex spouse or partner of a parent or the intended parent in a surrogacy. "Other" may be a caretaker, grandparent or aunt, for example.) Check one: <input type="checkbox"/> I am the biological parent of the child named below. My gender: <input type="checkbox"/> Female <input type="checkbox"/> Male (complete 3. Below) <input type="checkbox"/> I am the non-biological parent of the child named below. My gender: <input type="checkbox"/> Female <input type="checkbox"/> Male (provide all pertinent information regarding the conception of the child in Section IV; skip 3. <input type="checkbox"/> Other (Explain relationship to the child in section IV.) We suggest the instruction for Section I #3. be incorporated into the form in the following manner: In a box put the following: Enter the name of the person with whom the birth mother had sexual intercourse that resulted in the conception of the child. If the child was conceived using assisted reproduction or a surrogate parent, describe all pertinent information regarding the conception of the child in section IV.	Addition Change	Gender IVF or Sperm	Thank you for your comment. At this time we do not think a separate affidavit is needed. See response to comment #11.

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14	State	Declaration in Support of Establishing Parentage	On the Declaration in Support of Establishing Parentage, there needs to be questions that a Guardian/3rd party can fill out when they are the petitioner in the case and they do not know the answers to the questions that are listed	Addition - I	Guardian/3rd Party	#1. We disagree with this comment. See the response to the first comment in comment #7. #2. We disagree with this comment. The workgroup decided to include detail about completion of the form in the Instructions rather than on the forms themselves. Additionally, the suggested references to which sections of the form are relevant to certain checkboxes are not accurate. For example, a biological parent must also complete question 2 as well as question 3 and the subsequent questions.
15	State	Declaration in Support of Establishing Parentage	On the Declaration of Establishment there is a section for mother and father. #1 How about a section for the 3rd party/guardian? #2 If the guardian fills out the mother's section, it sounds as though he/she lived with the father. #3 Also, will the documents still need to be notarized? There isn't a place for that on any of them.	Addition Question	Guardian/3rd Party	We disagree with the recommendation. A guardian/third party should fill out the form based on information provided by the parent of the child. If the individual lacks the requested information, the individual may leave that response blank. However, we have revised the Instructions to add a sentence that states a person should complete the form to the extent he or she has information. The workgroup does not believe that additional questions are needed. We have also revised the form so that a caretaker has the option to check "Not applicable" to certain questions. Training Issue
16	State	Declaration in Support of Establishing Parentage	Should there also be a question regarding IVF or sperm donation?	Addition	IVF or Sperm	#1. We disagree with the recommendation. There is an "other" checkbox if the petitioner is not a parent. #2. Thank you for your comment. We agree that the language in Section II needs to work for all parties. We have revised the form so that a caretaker has the option to check "Not applicable" to certain questions. #3. Thank you for your comment. UIFSA 2008 does not require that testimony be notarized or verified.
17	State	Declaration in Support of Establishing Parentage	The Income Withholding for Support (IWO) references a set of on-line instructions for employers to use. On-line instruction could also be of benefit for the Declaration in Support of Establishing Parentage.	Addition Comment - Concern	IWO	We disagree with this comment. The workgroup decided that the form does not need to include a question regarding IVF or sperm donation. Such information may be included in Section IV. Other Pertinent Information if the person completing the Declaration wants to provide such information.

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18	State	Declaration in Support of Establishing Parentage	State is concerned that questions related to a completed voluntary acknowledgment of paternity within the Declaration in Support of Establishing Paternity may encourage states to seek paternity establishment when a valid acknowledgment has already established a child's legal father. State recommends that item I (6) in the Declaration section include more wording from the instructions to ensure that an individual is not wasting time by completing the wrong form. For instance, add the following language next to the Yes checkbox, "If an executed AOP exists for the named respondent and child, STOP! DO NOT COMPLETE THIS FORM! The named respondent is already the legal father." Unfortunately, most individuals do not read the instructions and if this language is not highlighted on the form, the states will receive several inappropriate Declarations and requests to establish parentage.	Addition	Legal determination of parent	Thank you for your comment. The forms and instructions are on the OCSE Website.
19	State	Declaration in Support of Establishing Parentage	The form states "Do not complete this form if any person has been legally determined to be the parent of the child." The biological mother is considered to be a legal parent. This language seems to indicate that a biological mother may not use the form. Suggest rewording this to say: Do not complete this form if the child has two legally established parents.	Change	Legal determination of parent	Thank you for your comment. The form needs to be clear regarding when a Declaration is appropriate. We have revised the form to add a directive, in bold font, "DO NOT COMPLETE THIS FORM IF THERE IS AN ORDER OF PARENTAGE OR A SIGNED VOLUNTARY ACKNOWLEDGMENT OF PARENTAGE." The instructions provide more detail. We have added the following language to the Instructions: NOTE: An order of parentage can include a divorce decree or an adoption order as well as a tribunal order. This clarifies that a parentage order can include an adoption order. It is up to the state to ensure that parents complete the Declaration in appropriate cases. This is a training issue.
20	State	Declaration in Support of Establishing Parentage	Page 1 of the form states "DO NOT COMPLETE THIS FORM IF ANY PERSON HAS BEEN LEGALLY DETERMINED TO BE THE PARENT OF THE CHILD." This statement may be confusing. For example, a biological mother may believe that it is not appropriate to complete the form because she is legally the child's parent. We suggest changing this language to "DO NOT COMPLETE THIS FORM IF ANY OTHER PERSON HAS BEEN LEGALLY DETERMINED TO BE THE PARENT OF THE CHILD." We suggest making the same change to page 1 of the instructions.	Change	Legal determination of parent	We disagree with the recommended language. See response to comment #18.

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21	State	Declaration in Support of Establishing Parentage	The statement aft the header: "Do not complete this form if any person has legally determined to be the parent of the child" - We have a concern with this statement as there could be instances where the form is completed and a person has been legally determined to be the father. For example, for cases where there is a legal father (signed affidavit) who obtains genetic tests showing he is not the biological father and the mother names another man as the biological father (alleged father). As long as an order had not been entered, state would proceed with a legal versus alleged case using this form. We propose this statement be changed to bold type and include the following additional wording: Do not complete this form if any person has been legally determined to be the parent of the child and the legal determination is not being contested.	Change	Legal determination of parent	We disagree with the recommended language. See response to comment #18.
22	State	Declaration in Support of Establishing Parentage	In the statement "Do not complete this form if any person has been legally determined to be the parent of the child" the word "any" is misleading; this is an example of why this form doesn't work well covering multiple parent types. In the Paternity Affidavit, which generally is completed by the known, legally determined mother of the child, this sentence would say "...if any person has been legally determined to be the father of the child." Use of this form presumes that the person making the declaration is, or has been legally determined to be, the parent of the child, so that person, if being literal, might conclude that he or she should not complete the form.	Comment - Concern	Legal determination of parent	We disagree with this comment. The Instruction to Section I, item 6 states federal law: "Unless rescinded or challenged within the time frame and in the manner set in state law, the signed acknowledgment is a legal determination of parentage." See response to comment #18. Furthermore, Section 315 of UIFSA states that "A party whose parentage of a child has been previously determined by or pursuant to law may not plead nonparentage as a defense to a proceeding" under UIFSA. Training Issue
23	State	Declaration in Support of Establishing Parentage	One agency expressed concern that the Paternity Affidavit has been replaced with the Declaration in Support of Establishing Parentage and the potential of a Judge or Commissioner who questions why no notarized sworn Affidavit is being presented.	Comment - Concern	Notary	Thank you for your comment. See response to comment #18
24	State	Declaration in Support of Establishing Parentage	Section V has removed references to a Notary Public because UIFSA 2008 requires only that the petition be signed under penalty of perjury. However, despite the change to UIFSA, other laws of the responding tribunal may hold the person signing the statement to a higher standard. Therefore, we suggest the form retain a sworn statement in Section V. that requires that the document be signed before a Notary Public.	Comment - Concern	Notary	We disagree with this comment. UIFSA 2008 does not require that testimony be notarized. Rather it provides that an affidavit, which would not be excluded as hearsay if given in person, is admissible in evidence if given under penalty of perjury.
25	State	Declaration in Support of Establishing Parentage	Form could be confusing to participants; mix of concepts doesn't work well.	Comment - Concern	Paternity vs Parentage	We disagree with this comment. The form is designed for intergovernmental proceedings under UIFSA. As noted by the comment, UIFSA 2008 does not require a notarized affidavit.
26	State	Declaration in Support of Establishing Parentage	Title of document is confusing. Suggestion to make the title Paternity Declaration and add a separate Parentage Declaration form – they really are very different concepts.	Comment - Concern New Form	Paternity vs Parentage	Thank you for your comment.

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27	State	Declaration in Support of Establishing Parentage	In the Instructions, page 4, Section II, Item II, 21, we ask that the language in the second sentence be amended to reflect that the person asserting legal parentage of the child should also attach a photograph of himself or herself. The purpose of this field is to give the individual asserting parentage an opportunity to indicate whether the child has similar physical characteristics. It would be helpful to also have a picture of the person asserting parentage to use to compare to the photograph of the child.	Change	Photo	We disagree with the comment. In 1973 the Uniform Law Commissioners drafted the Uniform Parentage Act. The workgroup concluded that the term "parentage" is now widely recognized, and includes both mothers and fathers.
28	Organization	Declaration in Support of Establishing Parentage	Either create a new declaration to be completed by the alleged father or ensure the revised version accommodates completion by the alleged father. Not only do the pronoun references change, but also the scope of personal knowledge regarding the conception. You may want to consider a paragraph where an alleged father may acknowledge paternity in the declaration or consent to genetic testing .	Addition	Alleged Father	We agree with this comment. We have revised the instructions to Section II, item 1n to read "1n: "The child resembles the respondent." - Check "Yes" or "No" to indicate whether the child has physical characteristics similar to the respondent. Check "Photo attached" if you are attaching a photograph of the child and the respondent." We have revised the instructions to Section II, item 2l to read "2l: "The child resembles me." - Check "Yes" or "No" to indicate whether the child has physical characteristics similar to you. Check "Photo attached" if you are attaching a photograph of yourself and the child."
29	State	Declaration in Support of Establishing Parentage	After #4 insert a question asking if the "presumed Father" has been disestablished. If so, when, where and how? Or if the parties have signed a denial of paternity. If so, when and where?	Addition	Presumed Father	We disagree with the comment. We do not believe a separate declaration by an alleged father is necessary. This revised form may be completed by an alleged father. Throughout the form, pronoun references include both genders, such as "he/she" and "himself/herself." An alleged father can answer questions regarding the date of conception.

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30	State	Declaration in Support of Establishing Parentage	<p>State's process would benefit if the form requested additional information to help determine whether the presumption of parentage applies. See highlighted text and note suggested format change below.</p> <p>1. The following facts support a presumption of parentage: If additional space is needed, use Section IV.</p> <p>a. The biological mother was married, and the child's birth occurred during the marriage or within 300 days after the marriage legally ended. <input type="checkbox"/> No (skip to 4b.) <input type="checkbox"/> Yes (attach documentation and provide information below) If yes and the mother's spouse/former spouse is not the person named as respondent in this Declaration, provide the spouse/former spouse name, address, and gender and explain why he/she is not the child's parent. Date Marriage began (month, day, year) Date Marriage Legally ended (month, day, year) Tribunal where order ending the marriage is entered _____</p> <p>b. A person acted as, and presented herself/himself to be, the child's parent. <input type="checkbox"/> No <input type="checkbox"/> Yes (provide information below) If yes and the mother's spouse/former spouse is not the person named as respondent in this Declaration, provide the spouse/former spouse name, address, and gender and explain why he/she is not the child's parent.</p> <p>c. A genetic test ordered/administered by a tribunal or a IV-D agency to determine the other biological parent of the child indicates a probability of parentage of %. <input type="checkbox"/> No <input type="checkbox"/> Yes (attach documentation and provide information below) If yes, and the individual tested is not the person named as respondent in this Declaration, provide the spouse/former spouse name, address, and gender and explain why he/she is not the child's parent.</p> <p>2. Is any person other than the birth mother named on the child's birth certificate? <input type="checkbox"/> No <input type="checkbox"/> Yes (provide information below) If yes, provide the individual's name, address and gender.</p> <p>3. Has any person completed a voluntary acknowledgment of parentage for this child? <input type="checkbox"/> No <input type="checkbox"/> Yes (attach documentation and provide information below) If yes, and the individual is not named as the respondent in this declaration, provide the individual's name, address, and gender.</p>	Addition Change	Presumption of Parentage	<p>We disagree with this comment. Each presumption listed on the form leaves a place to explain why the presumed parent is not listed as the parent.</p>
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31	State	Declaration in Support of Establishing Parentage	<p>Case involving parentage presumed by marriage when the alleged biological parent is someone other than the presumed parent are legally and factually complex. Additional questions surrounding the facts and circumstances in these types of cases would be helpful. Also, the instructions should emphasize the importance of including supporting documentation with the form. For example, in Section I, Item 4a, if the mother was married when the child was born or conceived, she is asked for the dates when the marriage began and ended. Additional questions that need to be asked include: (1) Are you still married to that person? If yes, is there a divorce action pending? Where? In what court? What case number? If no, attach a copy of the divorce judgment. If not on the form itself these questions should be set out in the instructions for persons in this situation. Letting the person know the specific information needed will help move the case along and make it more likely that the case is properly analyzed at the outset so that the appropriate action is taken.</p> <p>It may be that there is a child support order for the child. That questions should be asked. The presumed parent may be under an order and paying. The responding jurisdiction needs to know that before taking action against an alleged biological parent.</p> <p>Also, in these cases it is very important to understand the relationship and extent of any contact or lack thereof between the presumed parent and the child. Knowing the relationship between the alleged biological father and child is not enough to properly evaluate the case. Does the presumed parent see the child? Has the child lived with them? Do they support the child? Or has the presumed parent stated orally or in writing that s/he is willing to relinquish parental rights? In my state and in other states, if there is a presumption of parentage/paternity due to marriage, the presumed parent (typically the legal father) is an indispensable party to a paternity action concerning a child born or conceived during marriage. That means the person's identity and whereabouts must be obtained so that they can be made a party to the action and served with legal process. The petitioner should be made aware of these possibilities in the instructions and as much specific information obtained as possible and provided with the declaration and petition. If not, the case will not move forward in the appropriate manner and may not move forward at all.</p> <p>Cases involving same-sex parents also present varying levels of complexity. The instructions should emphasize the need for the petitioners in such cases to describe and document the specific facts and circumstances of the case and the relationship of the alleged parent to the child.</p> <p>Recommendation: Revise the form and the instructions to inform petitioners of the need to provide additional details and supporting documentation in cases involving both a legal and biological alleged parent and cases involving same-sex parents.</p>	Change	Presumption of Parentage	<p>We disagree with the comment. The formatting and directions that were agreed to by the workgroup as clear. We did add a field to 1.4.a that reads "Tribunal that issued order legally ending the marriage:_____".</p>
32	State	Declaration in Support of Establishing Parentage	<p>Consider revising the language of question #3 in Section I. A caretaker could fill out this form therefore; there should be two blank spaces: The child was conceived as a result of sexual intercourse between _____ and _____ during the time stated above.</p>	Change	Two blanks for sexual intercourse	<p>We agree with this comment. We have updated the form to read: "The child was conceived as a result of sexual intercourse between _____ and _____ during the time stated above." The two blanks would include the legal name (first, middle, last, suffix) of each person.</p>
33	State	Declaration in Support of Establishing Parentage	<p>Section 1.3 states "The child was conceived as a result of sexual intercourse between _____ and me during the time stated above." Because sometimes the signer of the form will not be the one who engaged in sexual intercourse, for example in a caretaker situation or step parent adoption, we suggest changing this to "The child was conceived as a result of sexual intercourse between _____ and _____ during the time stated above." This way, the signer of the form can fill in the names of the biological parents if needed without providing additional explanation.</p>	Change	Two blanks for sexual intercourse	<p>We agree with this comment. See response to comment #32</p>

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34	State	Declaration in Support of Establishing Parentage	Page 1, Section I. Declaration, Item 1: State recommends that the "Date conception occurred (month, year)" identifier be replaced with an identifier indicating that a range of dates may be provided. For example, "Begin and End Date of Sexual Relationship" or "Date(s) of Sexual Intercourse." This change would align the contents of the field with the instructions provided for the completion of this field.	Change	Two blanks for sexual intercourse	We disagree with this comment. The time period of the sexual relationship or all the dates of sexual intercourse are not important. The only relevant dates are the date(s) on which conception likely occurred. The instructions provide adequate guidance.
35	State	Declaration in Support of Establishing Parentage	Change section 2, subsection 1B, "I told welfare officials that the respondent is the other parent of the child", to "I told the government worker that the respondent is the other parent of the child", or some other generic term rather than the specific "welfare officials."	Comment - Concern	Welfare	Thank you for your comment. Based on this comment and other comments received, we decided to remove this item from the form.
36	Organization	Declaration in Support of Establishing Parentage	IV. Other pertinent information - should included specific options.	Addition		We disagree with this comment. The declarant has discretion in deciding what other information to provide. Elsewhere on the form, there is direction to use Section IV to provide detailed explanations for Sections I, II, and III.
37	State	Declaration in Support of Establishing Parentage	Propose addition on page 1, to be inserted at paragraph I.4.a., just below "date marriage legally ended..." of "Date of separation (month, day, year)"	Addition		We disagree with the comment. If the date of separation is relevant to rebut the marital presumption, the declarant can provide the information in the space that says "explain why the spouse/former spouse is not the parent."
38	State	Declaration in Support of Establishing Parentage	Update instructions accordingly, proposal on page 3 of 5, revise last sentence of paragraph 4a to read "Provide the dates the marriage began, the biological mother and her spouse/former spouse separated, and the marriage legally ended and provide supporting documentation."	Addition		We disagree with the comment. See response to comment #37.
39	State	Declaration in Support of Establishing Parentage	Instructions - Some states may be unable to release a copy of the child's birth certificate to the other state. If the parties are unable to provide a copy of the birth certificate, we would like clarification provided to states that unless state law prohibits them from proceeding, they should proceed without the child's birth certificate.	Addition - I		We disagree with the comment. This is a training issue and does not need to be addressed in the form instructions. Training Issue
40	State	Declaration in Support of Establishing Parentage	Instructions - The form should include an instruction at the beginning informing the party completing the form such as: "You must respond to every question unless directed otherwise in the instructions."	Addition - I		We disagree with this comment. The language is not necessary to state what is self-evident, that a person should respond to the questions, to the extent of his or her ability.
41	State	Declaration in Support of Establishing Parentage	#1 - Page 1. Section I. Declaration: (1) Check one: Suggest rewording the second option "I am the legally established, non-biological parent of the child named below." #2 - And we suggest adding another question, "How was parentage established?"	Addition Change		#1 We disagree with the comment. If there is an order of parentage, which would include an adoption order, the person should not complete this form. We have added the following language: "NOTE: An order of parentage can include a divorce decree or an adoption order as well as a tribunal order." #2 We disagree with this comment. If parentage has been established, this form should not be used.

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Declaration in Support of Establishing Parentage

42	State	Declaration in Support of Establishing Parentage	Structure the questions in such a way so that the party completing the form has to indicate that a particular question is not applicable to their situation. If that is not possible, provide clear instructions within the form regarding what is required and what is not. As written, the form instructions are clear to a IV-D agency, but they may not be clear to a party. A separate set of "plain language" instructions that does not include information intended specifically for IV-D programs might address this.	Addition Comment - Concern		We agree with this comment. See response to comment #14.
43	State	Declaration in Support of Establishing Parentage	Are there witnesses to your relationship with the Defendant (II 1 (p), II 2 (m)). Please in section IV provide names and addresses. Why is this still on the form? In 23 years I have not seen one state contact any of the witnesses and half the time the CP does not have a current address for the witness. There are not trials anymore and we pretty much just go with the genetic test results. I would like to see that statement taken off as being irrelevant in the present day and age.	Change		We agree with the comment. We have removed this question from the form.
44	State	Declaration in Support of Establishing Parentage	Page 1. Section I. Declaration: (4) (a) Suggest rewording. If this form can be used by the person asserting parentage, therefore making the non-legal parent the petitioner, then it is incorrect to say "If yes and the mother's spouse/former spouse is not the person named as the respondent..." because the respondent may be the mother and the non-spouse may be the petitioner.	Change		We disagree with the comment. We find the comment confusing. The question seems to be related to the birth parent, who can only be the mother. The current phrasing is correct even if the biological mother is the respondent.
45	State	Declaration in Support of Establishing Parentage	Section III should be switched with Section I so that petitioner and mother's statements are together. Section II should be on page 3. Would cause less room for error going from Section II to III.	Change		We disagree with this comment. We believe the current order of the Sections on the form is appropriate. Sections I and II should be completed by the petitioner. Section III is about the birth mother who may or may not be the petitioner.
46	State	Declaration in Support of Establishing Parentage	Page 2, Section II. To Be Completed by the Petitioner, Item 1.e.: This item relates to whether the respondent communicated about the pregnancy and/or about the child. There is an associated check box, "Copies attached." It is suggested that clarifying language be added to indicate that copies of any communications by the respondent are attached (e.g., "Copies of communications attached").	Change		We agree with this comment. We have modified the instruction to read: "Copies of communications attached"
47	State	Declaration in Support of Establishing Parentage	The Declaration in Support of Establishing Parentage Form has been updated to be gender neutral, allow for non-biological parents and to use language consistent with the current version of UIFSA e.g. parentage instead of paternity. The final product will be difficult for a layperson to fill out without assistance.	Comment - Concern		Thank you for your comment. We agree that these are complex cases and that most persons will need assistance in completing the form. That is why the instructions are so important. Training issue.
48	Organization	Declaration in Support of Establishing Parentage	II. to be completed by the petitioner - should both 1 and 2 should be completed? how do we know that a petitioner is a parent in non-bio parentage situation?	Question		We agree with this comment. We have clarified the section name to be: "To Be Completed By The Petitioner (complete either 1 or 2, as appropriate)"

0970-0085 - Attachment 2
General Testimony

#	Submitted By	Form	Comment	Category	Common	Comments/Notes
1	State	General Testimony	Section VI.B.2 sets forth the grounds for modification, one of which is "The current support order was most recently established or modified at least 3 years ago." For the reasons in the comment under the Uniform Support Petition, we think this should be changed to "The current support order was most recently established or modified at least 3 years ago (or such lesser time as permitted by the laws of the responding tribunal)."	Change	3 year	We agree with this comment. We have added language that says at least 3 years ago "or such lesser time as permitted by the laws of the responding jurisdiction." Training Issue.
2	State	General Testimony	Page 6. Section VI. Additional Information for Child Support Calculation: (A)(4) (d) Suggest adding the amount of benefit paid because my state, and perhaps other states, caps reimbursement for past assistance paid based on ability to pay or the actual amount of assistance paid, if less than ability to pay.	Addition	Additional Information for CS Calculation	We disagree with this comment. A tribunal is required to follow the guideline calculation based on the parties' income. Training Issue. OCSE-AT-93-04 provides the following: USE OF GUIDELINES AS A REBUTTABLE PRESUMPTION IN ESTABLISHING SUPPORT OBLIGATIONS Effective October 13, 1989, section 467(b) of the Social Security Act (the Act), and the implementing regulations at 45 CFR 302.56(f), specify that there shall be a rebuttable presumption, in any judicial or administrative proceeding for the award of child support, that the amount of the award that would result from the application of such guidelines is the correct amount of child support to be awarded. Congressional intent, as indicated in the Conference Report (Report No. 100-998), is that judges and other officials must use the "State's guidelines, uniformly applied, as a rebuttable presumption." Therefore, there must be one set of guidelines developed by a State and uniformly applied as a rebuttable presumption in setting all child support awards. This would include application of the guidelines to establish child support awards for prior periods. For example, once paternity is established, the court may order back support to the date of birth of the child or the date the action was filed. USE OF PRESUMPTIVE GUIDELINES IN SETTING SUPPORT FOR PRIOR PERIODS In setting support awards, States are required, at a minimum, to take into consideration the obligor's earnings and income, in accordance with 45 CFR 302.56(c)(1). The establishment of a child support award covering a prior period must be based on guidelines and take into consideration either the current earnings and income at the time the order is set, or the obligor's earnings and income during the prior period. The award of back support is not required under Federal rules but may be appropriate in accordance with State law.
3	State	General Testimony	Page 6. Section VI. Additional Information for Child Support Calculation: (B) Suggest adding a third option "Existing child support order being registered for modification."	Addition	Additional Information for CS Calculation	Thank you for this comment. In reviewing section VI, the workgroup realized that the information sought in B.1 was already provided in the Letter of Transmittal Requesting Registration. We therefore decided to remove this question in its entirety.
4	State	General Testimony	Page 6—Section VI.,B.1.a. and b.— "order" should be between the words "tribunal" and "number."	Addition	Additional Information for CS Calculation	We disagree with this comment. The decision was made to use Tribunal Number. Training Issue.

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General Testimony

5	State	General Testimony	Section VIII: Petitioner is not always the one requesting the establishment and/or modification. Recommend a box to check that corresponds with the person to whom the information belongs.	Addition	Additional Information for CS Calculation	We disagree with this comment. The petitioner by definition is the person or entity requesting the tribunal to take certain action. We have revised the heading of the General Testimony to align it with the Uniform Support Petition. It clearly identifies whether the petitioner is the obligee or obligor. Section VIII clearly states
6	State	General Testimony	State needs to differentiate between reimbursed and unreimbursed child care expenses for our child support calculations. Section IV does not require the party to say if any of the child care expenses are reimbursed. This would be a helpful addition.	Addition	Additional Information for CS Calculation	We disagree with this comment. The workgroup felt the instructions are clear. Training Issue.
7	Organization	General Testimony	IV. Dependent Children in this action - Child care actually paid per month. Need to emphasize payments vs expenses which could be subsidized and per child expense is needed when multiple children are in care.	Change - I	Dependent Children	We disagree with this comment. We believe the instructions are clear. The information about child care can be included in section IX Other Pertinent information, if needed. Training Issue.
8	State	General Testimony	Section VI. A.4.a. would be more beneficial if it included the basis for the date. Birth of the child, IV-D open, etc.	Addition	Additional Information for CS Calculation	We disagree with this comment. Examples are included in the instructions of what this date could be. Training Issue
9	State	General Testimony	State would also appreciate the ability to have multiple date ranges in Section VI.A.4.d. since assistance is frequently off and on.	Addition	Additional Information for CS Calculation	We disagree with this comment. We have added "If there are multiple dates, explain and include documentation in section IX (Other Pertinent Information)." to the instructions to clarify where multiple dates should be documented. Training Issue
10	State	General Testimony	Section VI B.2, Modification, indicates whether earnings of either party have changed substantially and whether the needs of the child have changed substantially. This is helpful, however, knowing when the change occurred and the reason for it is also needed to determine if the change is involuntary and permanent. Recommendation: Add space to say when the change happened and the reason for it.	Addition	Additional Information for CS Calculation	We disagree with this comment. However we have added a checkbox in section X Attached and Incorporated by Reference to indicate if the petitioner is providing documentation in support of a request for modification. Training Issue
11	State	General Testimony	Instructions Page 10: Section X Attached and Incorporated by reference: line 2, when discussing the type and number of copies. Recommend adding the word "Regular" in order to distinguish the type of copies of the order. Attach one certified copy and one regular copy of the controlling support order.	Addition	Attachments	We disagree with this comment. The word "regular" is not a term used in UIFSA. Training Issue

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General Testimony

12	State	General Testimony	Throughout this form "non-parent" should be added in parentheses following the word "caretaker." Although this is defined in the instructions, the customer who completes this form will not receive the instructional packet. Taking this step would clearly distinguish between the caretaker and the obligee.	Addition	Caretakers	We disagree with this comment. The instructions should be provided to the person filling out the form. The instructions were separated because of the length of the file. They should be included with the form. We have added a sentence in the form title stating "(Instructions should be provided to the petitioner as part of the form.)" and have also included a note on the instructions stating "Instructions should be provided to the petitioner as part of the form." Training Issue.
13	State	General Testimony	Because all the children may not reside with a caretaker, we suggest adding a field to Section I.E and Section II.E. asking which children reside with the caretaker.	Addition	Caretakers	We disagree with this comment. An action will only involve the children in the care of the petitioner. Training Issue
14	State	General Testimony	Page 1. Section I. Personal Information About Petitioner: (A) (1) states "Petitioner is Obligee, Obligor or Caretaker." A caretaker would also be the obligee. We suggest saying "[] Obligee (if Caretaker, skip to I.E. below) [] Obligor."	Change	Caretakers	We agree with this comment. We have revised the form so that Section I seeks Personal Information about Obligee. Within that Section, there is a place to provide information about an obligee parent or an obligee caretaker. Training Issue
15	State	General Testimony	Caretaker's relationship to child is listed on the PII form, so does it need to be on the general testimony too?	Question	Caretakers	We believe that it does since the new Personal Information Form for UIFSA § 311 does not contain this information. Training Issue
16	State	General Testimony	Page 2 of GT, E. When is a caretaker the respondent? Is this numbered correctly or in the correct placement in the GT?	Question	Caretakers	We disagree with this comment. The respondent is not always the obligor so caretaker could apply to either. However, because of the comments received asking for clarification about how to complete the form if the identified Petitioner in Section I was a caretaker or a IV-D agency, we have revised the form so that Section I seeks personal information about the obligee (rather than the Petitioner) and Section II seeks information about the obligor (rather than the respondent). This revision ensures the responding tribunal has information about the individual parties, and identifies those individuals more clearly. Training Issue

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General Testimony

17	State	General Testimony	The current General Testimony, Section V(B) contains a statement that the child(ren) began residing in _____ (state) on _____ (month/year). This section appears to have been deleted from Section V and it does not appear to be included in Section VI. The comments regarding Section VI provide that there are new questions related to custody and parenting time. We find this information related to the home state of the child useful.	Addition	Child residence	We agree with this comment. We will add this to the Personal Information Form for UIFSA § 311 form. Training Issue
18	State	General Testimony	In the heading of the form, we believe there should be an option labeled "This request or information sent through CSENET". This option is included on the Transmittal 1. The Instructions to this form provide that CSENet transactions are the recommended method for sending information to another state.	Change	CSENet	We disagree with this comment. This form cannot be sent via CSENet and the instructions have been modified to clarify this. Training Issue
19	State	General Testimony	Page 3, section IV. Dependent Child(ren) in This Action: Information about when the child began residing in the state is no longer requested. However, this information could be relevant in the case of simultaneous proceedings. It is suggested that the request for information about the duration of the child's residency in the state be retained.	Addition	Dependent Children	We agree with this comment. We will add this to the Personal Information Form for UIFSA § 311. Training Issue
20	State	General Testimony	IV. Dependent Child(ren) in This Action, Parentage Established - Parentage information should be included on this form to prevent the PII from being submitted as evidence.	Addition	Dependent Children	We disagree with this comment. The information is on the appropriate forms. Training Issue
21	State	General Testimony	Instructions Page 5: Section IV Dependent Children, Item 6: Instruction for entering the basis of claim and relationship with child is unclear as currently written. Current instructions lead you to believe that you only fill in the claimant name if it is the child on SSI Disability. Recommend read as follows by adding bolded section. Item 6: Check the appropriate box to indicate whether or not any benefits are received for the child, for example: Social Security Disability Income (SSDI); Social Security Retirement Income (SSRI); Veteran's Disability Income; Railroad Retirement Income (RRB Retirement); Railroad Retirement Disability (RRB Disability). If the answer is yes, provide the benefit type and the amount received on a monthly basis on behalf of the child. Enter the name of the Claimant and relationship to the child in the space provided. If the child receives Supplemental Security Income (SSI) based on the child's disability, enter the child's name in the line, "Based on claim of ____" and enter "Self" in the line, "Relationship to child ____."	Change - I	Dependent Children	We agree with this comment. The sentence " Identify the claimant and the claimant's relationship to the child in the spaces provided." will be added. Training Issue

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General Testimony

22	Organization	General Testimony	We are concerned that the "Expenses" Section was removed. Removal of the "Expenses" section may negatively impact the responding jurisdiction's ability to expeditiously address modification actions, given that a change in the amount of expenses related to the child is often a legal basis for the modification. While we recognize this information can be provided as additional information on the form under Section IX, if specific information is not requested, generally adding it at the end may often be overlooked and not provided. While child support guidelines are based on income of the parties, some jurisdictions' child support guidelines allow deviation based on certain expenses paid by a parent. If the specific information is not initially included, there may be delays in getting the required information from the applicant and to the responding agency to take to court, risking dismissal and potentially prejudicing the case if the child ages out and no action is ever possible. If the legal/administration action is dismissed and the responding jurisdiction closes the case, then the applicant is inconvenienced, not only by the delay, but also the need to appear again in the local office to execute a new packet of forms for a new referral.	Comment - Concern	Expense Section	We disagree with this comment We feel the appropriate place to provide information about expenses, if relevant, is under the additional information section. Training Issue
23	State	General Testimony	Page 8—Section VIII., A.6—"Other support obligations (child and spousal) actually paid or payable" is not listed as an option among the "Other deductions." This should be included.	Addition	Financial Information	We agree with this comment We will modify the instructions for what is now Section VIII.A.4(e) "Other" to include other support obligations listed in Section I.D. or Section II.D. Training Issue
24	State	General Testimony	Section VII, Financial Information: Want Petitioner Expenses added back in: A certain state regularly asks for expense info.	Addition	Financial Information	We disagree with this comment We feel the appropriate place to provide information about expenses, if relevant, is under the additional information section. Training Issue
25	State	General Testimony	Section VII, Financial Information: Want Spouse/Partner income information added back in, some states ask for this info if there are children of that union, etc.	Addition	Financial Information	We disagree with this comment The appropriate place to provide information about spouse/partner income, if relevant, is under "other." In most cases, it is not needed. Training Issue
26	State	General Testimony	Section VII, Financial Information: Request that real estate/bank accounts/IRA/money market accounts etc. be added back in to Petitioner financial info.	Addition	Financial Information	We disagree with this comment We have not included them as a separate line item because cases with such assets are the exception. Information about such assets can be provided in Section IX. Other Pertinent Information. We will add an instruction to Section IX that provides additional information may also include information about real estate, bank accounts, IRA accounts, or money market accounts. Training issue.

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General Testimony

27	State	General Testimony	Section VI of the General Testimony form should require the petitioner to attach documentation of income during the period for which retroactive support is sought. DOR supports the changes made in Section VI, Part A, question 4, of the proposed General Testimony form, which provides several questions regarding retroactive support. We propose that question 4 additionally state explicitly that the petitioner must provide any available financial information for the period of time for which the petitioner is seeking retroactive support. This supporting documentation will help determine the appropriate amount of retroactive support, which depends on the parties' income during the relevant period of time.	Addition	Financial Information	We agree with this comment We will add to the criteria for selecting a yes. (If yes, complete the following questions and section VIII for the period of time.) Training Issue
28	State	General Testimony	Instructions Page 9: Part A – Monthly income, item n: the instruction should also state that the petitioner should explain “other sources” on the lines provided.	Change	Financial Information	We disagree with this comment We feel that the instructions are clear. Training Issue
29	State	General Testimony	Form Section VIII Financial Information: item 8 Gross income prior year should be clarified such as “Gross income prior year , 20 ___ \$_____”.	Change	Financial Information	We disagree with this comment We feel that this provides another place for error. Use the date on the form as a starting point. Training Issue
30	State	General Testimony	Section VIII. Financial Information#3 Total gross monthly income (page 8). Under this line, it states that this figure is the total of lines 2a through 2n, which may be misleading in court. Not all of the line items in 2a – 2n are considered income for purposes of calculating gross monthly income. Can some kind of clarification be added here?	Clarification	Financial Information	We agree with this comment Because support guidelines vary in their definitions of gross and net income, we have removed the total gross monthly income line, the adjusted net monthly income line, and the net monthly income line. The responding jurisdiction will decide how to use the information. Training Issue
31	State	General Testimony	Instructions - 31, Page 9, Section VIII. Financial Information, Part A. Monthly income from all sources, Item 2a.ii.: The form requests information about the gross monthly income amount of TANF whereas the instructions reference the gross monthly income amount of Family Assistance. It is suggested that the instruction be modified to primarily reference TANF, perhaps with an explanatory parenthetical referencing “Family Assistance” so as to mirror the information requested on the form.	Consistency - I	Financial Information	We agree with this comment We will make the language consistent. Training Issue
32	State	General Testimony	State likes the updates to the General Testimony but has one request under section VIII. It would be helpful to have a line listed for food stamps. We rarely see food stamps listed in ‘Other’ as customers do not think of this as their income. Also, not all states include the food stamps a parent receives as income. So, other state case managers may not remember to direct customers to include them as income. If a food stamp line is not added, this may result in an additional phone call to ensure we have all the income information necessary.	Addition	Food Stamps Financial Information	We disagree with this comment. The workgroup discussed this issue and concluded that it was rare that receipt of food stamps is factored into the guideline calculation. The group therefore decided that food stamps did not warrant its own line. Training Issue
33	State	General Testimony	We would like the gender to be added for the Personal Information About Petitioner when they are the caretaker. Relying on the name alone is often difficult. This information is included in the Personal Information About Petitioner in the first part of this section.	Addition	Gender	We disagree with this comment The caretaker gender is on the Child Support Agency Confidential Information Form. Training Issue

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General Testimony

34	State	General Testimony	<p>Section I and II. Petitioner and Respondent Information - #1 The gender fields may need an addition of "Transgender" or "Other" to meet today's societal needs.</p> <p>#2 We would propose that a question be added to number 4 in both Section I and II asking if the party is active military status.</p> <p>#3 Field E. on both. As mentioned before, we would like additional clarification if the caretaker has legal custody or if the caretaker has guardianship as it impacts how Missouri proceeds on the case. #4 We would also like "Please attach copy" in this field as we need a copy of the custody order or guardianship papers.</p> <p>We agree with the removal of the current spouse/partner information from this Section as it was not relevant.</p>	Addition	Gender	<p>#1 - We agree with this comment We have revised the form to include "Other" for persons who do not identify as male or female.</p> <p>#2 - We disagree with this comment This form is not the appropriate place. When we look at the USP again, we will discuss whether a checkbox about whether the respondent is active military should be added.</p> <p>#3 - We disagree with this comment As part of the caretaker information in revised Section I.E, there is a check box to indicate "Has legal custody/guardianship of child."</p> <p>#4 - We disagree with this comment There is a checkbox in Section X that reads: "Documentation of legal custody/guardianship of child(ren)".</p> <p>Thank you for your comment about current spouse/partner income.</p> <p>Training Issue</p>
35	State	General Testimony	<p>If you are going to keep the gender of the petitioner/respondent on this form even though it is on the PII form, you need to add that data field under the caretaker and child(ren) information on this form also. Preference would be to remove gender from Petitioner and Respondent and just have it on the PII form.</p>	Change	Gender	<p>We disagree with this comment Currently gender information for all parties is on the Child Support Agency Confidential Information Form. It is included for the child(ren) on the Confidential Information Form for UIFSA 311. It is included for the obligee/obligor on the GT.</p> <p>Training Issue</p>
36	State	General Testimony	<p>It is not necessary to put gender on the general testimony because it is already on the PII form.</p>	Change	Gender	<p>We disagree with this comment Currently gender information for all parties is on the Child Support Agency Confidential Information Form. It is included for the child(ren) on the Confidential Information Form for UIFSA 311. It is included for the obligee/obligor on the GT.</p> <p>Training Issue</p>
37	State	General Testimony	<p>Page 5. Section V. Health Care Coverage: (B)(2) for petitioner requests "Portion for the child(ren) listed in Section IV:" We suggest that the total cost be requested as well so states that calculate the allowable cost differently can have the information they need.</p>	Addition	Health Care Coverage	<p>We disagree with this comment. The monthly premium cost is already listed. This is the total and the child(ren) portion is also listed. We believe this should accommodate all state guidelines.</p> <p>Training Issue</p>
38	State	General Testimony	<p>Section V. Health Care Coverage: (C)(2) for respondent requests "Portion for the child(ren) listed in section IV:" We suggest that the total cost be requested as well so states that calculate the allowable cost differently can have the information they need.</p>	Addition	Health Care Coverage	<p>We disagree with this comment. The monthly premium cost is already listed. This is the total and the child(ren) portion is also listed. We believe this should accommodate all state guidelines.</p> <p>Training Issue</p>

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General Testimony

39	State	General Testimony	The General Testimony does not ask if someone is ordered to provide health insurance or pay cash medical support. We suggest adding this question to the General Testimony.	Addition	Health Care Coverage	We disagree with this comment If there is a duty to provide health care coverage for another family, this is covered in Section I.D or II.D and this requires an order to be attached. The General Testimony is not used for enforcement. For establishment this is a non-issue. For modification any order to provide health care coverage will be contained in the order being modified. Training Issue
40	State	General Testimony	Page 6, Section V (Health Care Coverage), instructions indicate the law of the responding jurisdiction determines whether or not past and ongoing medical expenses are included in an order. We feel it would be helpful to add this statement to the General Testimony form to alert customers the responding state's laws may not include these expenses.	Addition	Health Care Coverage	We disagree with this comment. We feel this is covered in the instructions and is not needed on the form. Training Issue
41	State	General Testimony	Page 4, V. Health Care Coverage, items c., d., e. and f. – if same coverage for each child can the words “same as above” be placed on the form?	Addition	Health Care Coverage	We agree with this comment We have made changes so that the child information does not have to be entered multiple times if it is the same for all children. Training Issue
42	State	General Testimony	V. Health Care Coverage - #1 We would propose changing the order of the parties to Petitioner, Respondent and then children. #2 Also, since the health care coverage is often the same for each child, we would like the option to choose a box that simply states "Same as child one". If the information is the same information as the Petitioner or Respondent, an option of "Same as Petitioner" and "Same as Respondent" may also eliminate the need to enter repetitive information. We like the expanded detailed selections listed under both the children and Petitioner/Respondent as to how health care coverage is currently being provided and by who (Individual policy, employer, Medicaid, CHIP, TRICARE.)	Addition	Health Care Coverage	We disagree with comment #1. We do not think that the change in order adds value. We agree with comment #2. See response to comment 41; we will revise the form so that the child information does not have to be entered multiple times if it is the same for all children. Thank you for comment #3; the detailed sections noted in the last comment are reflected in Section V.B.1 and Section V.C.1. Training Issue
43	State	General Testimony	#1 Section V, regarding Health Insurance information, is very cumbersome. It requires the health insurance information, which is most likely the same for each of the children, be filled out for each and every child. This may have been done with the expectation of separate child only policies, but we think this will be the exception rather than the rule. At a minimum, there should be a checkbox that you can check to say that the medical is the same for all children as it is for Child #1. #2 Subsection f for Child #3 reads differently than Subsection f for the other children. Because this may differ from child to child, we recommend removing this to a separate sub-section.	Change	Health Care Coverage	We agree with this comment With respect to the first comment, see the response to comment 41 above. We will revise the form so that the child information does not have to be entered multiple times if it is the same for all children. With respect to the second comment, we will change the statements so that all statements related to the children read the same. Training Issue

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General Testimony

44	State	General Testimony	The following is a suggested alternative format for Section V., which may make the section more intuitive and optimize space: Child's name <input type="checkbox"/> None <input type="checkbox"/> Medicaid <input type="checkbox"/> CHIP <input type="checkbox"/> TRICARE <input type="checkbox"/> Indian Health Service (skip to 1.e.) <input type="checkbox"/> Petitioner, through <input type="checkbox"/> an employer policy <input type="checkbox"/> an individual policy (Complete 1.c. below.) <input type="checkbox"/> Respondent, through <input type="checkbox"/> an employer policy <input type="checkbox"/> an individual policy (Complete 1.c. below.) <input type="checkbox"/> Other person: _____ Relationship to child: _____ (Complete 1.c. below.) And so on....	Change	Health Care Coverage	We disagree with this comment The proposed format has everything that is needed. Training Issue
45	State	General Testimony	State requests that the Section V. headings be changed to "Health Care Coverage – Children" and "Health Care Coverage – Petitioner." For consistency, Section C should be titled "Health Care Coverage – Respondent."	Change Consistency	Health Care Coverage	We agree with this comment The subheadings for Child(ren), Petitioner, and Respondent have been changed to add "Health Care Coverage". Training Issue
46	State	General Testimony	Page 6. Section V. Health Care Coverage: (G) asks "Is the respondent asking to be reimbursed for medical expenses paid?" Can the respondent ask? It seems that the petitioner would be asking this question since the purpose of using petitioner and respondent rather than just obligor and obligee is to identify who is asking for the action.	Clarification	Health Care Coverage	We agree with this comment. We have deleted V.G and V. H from the form. Training Issue
47	State	General Testimony	Page 6. Section V. Health Care Coverage: (H) asks "Is the respondent asking to be compensated for ongoing medical expenses?" If this is the petitioner's testimony, he or she would not know this information.	Clarification	Health Care Coverage	We agree with this comment. We have deleted V.G and V. H from the form. Training Issue
48	State	General Testimony	Section V D: Does listing the name of child, medical condition, and medications needed violate HIPPA? This can become a public record	Comment - Concern	Health Care Coverage	We disagree with this comment Medication is not being requested and the individual parties are not covered by HIPAA. Training Issue
49	State	General Testimony	Health Insurance information should be on a separate form. Concerns over the required health insurance information being requested, and the delay which will occur when completing the forms because participants never seem to have that information.	Comment - Concern	Health Care Coverage	We disagree with this comment This is information that needs to be provided and should be available. Child support orders need to address health care costs and it is required with every establishment and modification case. Note: The whole form includes sensitive information, which is stated at the top of the form. Training Issue

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50	State	General Testimony	Someone can mark that they have Medicaid and then it doesn't ask them to indicate if it's available thru their job. Seems like OCSE is moving forward with ACA but we are still going to have our New worksheet guidelines ordering health insurance be carried.	Comment - Concern	Health Care Coverage	We agree with this comment. We have made changes to accommodate if health insurance is available. While reviewing this comment we realized that children could have multiple providers for their insurance. We have changed the child(ren) to address multiple providers, which impacts questions A.1.b, A.2.b, and A.3.b. Change was made to V.B.4 and V.C.4 to read: "If the petitioner does not have health care coverage or the coverage is through Medicaid, is employer-sponsored coverage available" Training Issue
51	State	General Testimony	Under section V Health Insurance points E thru H ask if they are unpaid med bills that CP wants collected from AP – My staff asks if we start getting these, how will we handle them in our orders and in our system? We do not collect unpaid uninsured medical expenses. We leave that collection to the custodial parent or their private attorney. States may differ on this topic so including may cause an issue. If this is a IV-D requirement in one state, then perhaps there should also be a portion to indicate that it is required and the appropriate code citation.	Comment - Concern	Health Care Coverage	We disagree with this comment These forms are for both IV-D agency use as well as for private attorney use. They need to accommodate both users. Training Issue
52	State	General Testimony	Subsection V(G) and (H) ask whether the parties are seeking reimbursement for medical expenses paid. If this section implies a duty for our Child Support Services to collect these amounts, that is a problem. We do not currently do that.	Comment - Concern	Medical Expenses Paid	We disagree with this comment These forms are for both IV-D agency use as well as for private attorney use. They need to accommodate both users. Training Issue
53	State	General Testimony	Section V. Health Care Coverage, # 1(b) (page 4). Reference is made to "his/her. However in #2(b) and 3(b), it refers to "their". Can this be updated to make it consistent, either "his/her" or "their"?	Consistency	Health Care Coverage	We agree with this comment. The form will be adjusted so that the reference is consistent. Training Issue

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54	State	General Testimony	Section III. Legal Relationship of Parents of Children listed in Section IV - Add to this section "Provide documentation". Documentation of the legal relationship is important and should be noted as required.	Addition	Legal Relationship	<p>We agree with this comment that documentation should be provided. However, since section III addresses the legal relationship of the parents and children, we believe that section VII is a more appropriate location on the form to require copies of orders. We will modify section VII to include a parenthetical to provide a copy of the order. We will also add "Copy of order for divorce or legal separation involving the children in this action" as an attachment listed in section X.</p> <p>We have addressed this by adding a new question to section VII which states "Is there an order for divorce or legal separation involving the children in this action? (If yes, provide a copy of the order.)". We have also added a checkbox to section X which states "Copy of order for divorce or legal separation involving the children in this action."</p> <p>Training Issue</p>
55	State	General Testimony	Section III, #B: In addition to "Married On", should "Entered into Civil Union" added?	Question	Legal Relationship	<p>We disagree with this comment. In the instructions for section III, #H other - Civil Union is listed as something to be included here.</p> <p>Training Issue</p>
56	State	General Testimony	Instructions Page 3: Section 1-Personal Information about Petitioner, part E-Caretaker information: Item 2: Reference to maternal and paternal should be removed, as all gender specific (mother/father) references have been removed in all the other portions of these forms.	Consistency	Maternal/Paternal	<p>We disagree with this comment. The Workgroup determined that knowing this is helpful information. The reference is just in the instructions.</p> <p>Training Issue</p>
57	State	General Testimony	Instructions Page 4: Section 2-Personal Information about the Respondent, part E-Caretaker information: Item 2: Reference to maternal and paternal should be removed, as all gender specific (mother/father) references have been removed in all the other portions of these forms.	Consistency	Maternal/Paternal	<p>We disagree with this comment. The Workgroup determined that knowing this is helpful information. The reference is just in the instructions.</p> <p>Training Issue</p>

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58	Organization	General Testimony	Section VI B.2, Modification, sections are added to indicate whether earnings of either party or the needs of the child have changed substantially. However, additional information is needed to identify specifically when (time) the change happened and the reason for it (how and why) .	Addition	Modification	We disagree with this comment The Uniform Support Petition has been modified to say the change occurred since entry of the most recent order. There is sufficient information on the testimony form to determine what the changes are. Additional information can be provided in section IX of the General Testimony. We have also modified section X to include attachments in support of a request for modification. Training Issue
59	State	General Testimony	If more than 3 children exist, instructions indicate the information for additional children should be listed in Section IX and if needed, by attaching additional sheets. Due to the amount of personal information required for each child in addition to the need to include each child's insurance information, we are concerned all required information for additional children will not be included in Section IX.	Comment - Concern	More than 3 Children	We disagree with this comment. Given the form has a checkbox to allow for additional children, the state systems can program for the system to prompt for additional children. We added the following to the instructions for clarification: Check "See Section IX" when there are more than three dependent children in this action. Include all of the required information listed below for the additional children. Attach additional pages if needed
60	State	General Testimony	Section IV. Dependent Child(ren) in This Action - If there is only one child on the case but there is space for three on this form, can the form be condensed to only include the fields for the one child, omitting the other two child fields? Can we condense the form for number of children or do we have to stay true to the form layout? We support the detailed request for SSA/VA benefit information -type of benefit, amount, on whose claim. Not only is this information important for establishment and modification of right-sized orders, it will also be useful for enforcement. State grants the obligor credit towards his/her current support obligation for the benefit	Question	More than 3 Children	Thank you for your comment. The child support system can be programmed to include as many children as needed so long as all the information requested is included. Training Issue
61	Organization	General Testimony	The General Testimony Form: Section I,C that asks about other children in Petitioner's custody does not ask enough questions. Even before the proposed revised forms were released, workers commented that the corresponding section in the current version did not allow for information about these other children as it relates to their expenses. Workers recommended that the form also ask if the CP's insurance coverage included the other children and if the day care expense included them. This would be helpful to get the right amount of expense for the children in the instant action.	Addition	Other Dependent Children	Thank you for your comment. The revised form asks if the health care includes other children and the form is clear that the daycare expenses are only for the dependent children in the action. Training Issue
62	State	General Testimony	Section I C: To protect the privacy of the other potential children the petitioner is financially responsible for, should the date of birth be removed or at least reduced to an age?	Change	Other Dependent Children	We agree with the privacy issue, but the age is needed. We have changed the form and reduced the date of birth to be year of birth. Training Issue

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63	State	General Testimony	Section II C: Same issue as above. Birthdays of other children should be removed.	Change	Other Dependent Children	We agree with the privacy issue, but the age is needed. We have changed the form and reduced the date of birth to be year of birth. Training Issue
64	State	General Testimony	We ask that consideration be given to moving the confidential information in Section I(C) and II(C) (e.g., children's date of birth) to the PII Form.	Change	Other Dependent Children	We agree with the privacy issue, but the age is needed. We have changed the form and reduced the date of birth to be year of birth. Training Issue
65	State	General Testimony	Page 3 of instructions, Part C, Item b. – correct/remove this item as child's DOB is on PII only.	Change	Other Dependent Children	We agree with the privacy issue, but the age is needed. We have changed the form and reduced the date of birth to be year of birth. Training Issue
66	State	General Testimony	All new documents have parties SSNs and DOBs, etc., omitted, except for the General Testimony, where sections: I.C. 1-3 and II.C. 1-3 have blocks for the DOBs for "other" children the parties are responsible for that are not in the case. Will this remain or be removed due to PII?	Question	Other Dependent Children	We agree with the privacy issue, but the age is needed. We have changed the form and reduced the date of birth to be year of birth. Training Issue
67	State	General Testimony	State would benefit from additional fields for providing "other identifying information" such as tattoos, scars, other distinctive features, and alias information.	Addition	Other Identifying Information	We disagree with this comment The workgroup did not think that additional fields were needed on the General Testimony. We have revised the instructions to section II.B to include "Provide any additional physical descriptive information in section IX." to address the commenter's concern. Training Issue
68	State	General Testimony	Instructions Page 3: Section 1-Personal Information about Petitioner, part B – Physical Description of Respondent: "Attach a recent photo if available" is missing from this section, should be listed & consistent with the respondent section.	Consistency	Photo	We agree with this comment We will make sure the instructions are consistent with the form.
69	State	General Testimony	Page 6, Section VI A instructions indicate some state guidelines consider the amount of time the child(ren) spend with the obligor and states may require a court order or binding separation agreement indicating parenting time terms. We feel it would be helpful to add this information on the General Testimony form to reiterate this to the customer.	Addition	Parenting Time	We disagree with this comment. Instructions are attached to the form and in general should not be repeated on the form. Training Issue

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70	State	General Testimony	Section VI, Additional Information for Child Support Calculation, question 1, asks if there is a custody or parenting time order. If the answer is yes, the form indicates the person is to attach a copy of the order and enter on the form 'Issuing Tribunal Number' and 'Date of order.' If there is an order and a copy is not provided the responding jurisdiction will not have the information needed to locate the order. Recommendation: Add spaces to this section for the petitioner to identify the county, state, tribe, or foreign country entering the order.	Addition	Parenting Time	We disagree with this comment. It is not the responding jurisdiction's responsibility to locate an order it did not issue. Training Issue
71	Organization	General Testimony	Section VI, Additional Information for Child Support Calculation, question 1, asks if there is a custody or parenting time order. However, the section does not require identification of the county, state, tribe, or foreign country entering the order. Space for this information should be added to the form, so that the Order can be quickly identified and obtained.	Addition	Parenting Time	We disagree with this comment. It is not the responding jurisdiction's responsibility to locate an order it did not issue. Training Issue
72	State	General Testimony	Section VI— Not realistic to solicit custody/parenting time from participants in this way. Most participants will not know actual detailed parenting time information.	Comment - Concern	Parenting Time	We disagree with this comment. The petitioner can estimate the number of overnights the child has had with each parent. Training Issue
73	State	General Testimony	State suggests adding the estimated gross monthly earnings and other monthly income items back to Section II of the General Testimony. State also recommends keeping the section within the General Testimony that allowed a person to create a "payment record." State believes that these items, which have been omitted from the General Testimony, were a valuable resource for child support staff.	Addition	Payment Record	We disagree with this comment. Gross monthly earnings of the respondent can be included in Section IX if the state wants to provide this information. The work group decided that each state can use its own payment record rather than requiring the use of a specific format; the record is listed as an attachment in section X. Training Issue
74	Organization	General Testimony	Another question that could arise during use of this form is the use of "Petitioner" and "Respondent." In an action that is creating an original order, it is most likely that the CP or the caretaker will be the petitioner in the responding jurisdiction, and therefore the NCP mother or NCP father will be the respondent. However, in a modification action, is the worker to equate "Petitioner" with the true petitioning party in the underlying order, or is s/he to use it synonymously with the applicant for the modification services? The same question is applied to the use of "Respondent." Again, if this document is to be presented as evidence, it should be clear and consistent with additional evidence in the case that may designate the party to the parent.	Comment - Concern	Petitioner/ Respondent	The designation of petitioner or respondent is a state system or state pleading issue. We added check boxes to the heading to indicate if the petitioner and respondent is the obligee or obligor to help with clarification and to align the General Testimony with the Uniform Support Petition. Training Issue
75	State	General Testimony	Language is not participant-friendly. Participant will likely have additional questions when completing the form, requiring more time/contact with the staff.	Comment - Concern	Plain Language	Thank you for your comment. It is the opinion of the workgroup that the form is user friendly, while providing information needed for a legal action. State agencies should provide the petitioner with the Instructions to assist in completion of the form and be available to answer questions. Training Issue

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76	Organization	General Testimony	<p>II Personal Info About Respondent (D) - (If yes, attach <u>any information available and accessible regarding order and payment record/proof of payment and fill out order information below.</u>) We may have knowledge of the order but not the ability to provide proof. This comes up in cases where we are requesting assistance from responding agency to enforce their own order. We do not want this section to create an affirmative duty with which we cannot comply . It could unnecessarily slow case processing.</p>	Change	Proof of Order	<p>We agree with this comment. We changed the form to read "(If yes, provide information below, if known, and attach a copy of the order and payment record/proof of payment, if available.)". Training Issue</p>
77	State	General Testimony	<p>The General Testimony contains a statement that "It is recommended that this form not be filed in a public access file." There may be occasions where it is necessary to admit the General Testimony into evidence. It is believed that the recommendation is not intended to prevent a redacted General Testimony from being admitted into evidence; rather it is a prohibition to filing the document with the Clerk of Court in the publicly accessible case file.</p>	Clarification	Public Access File	<p>We agree with the comment that the General Testimony in most cases will be admitted into evidence. We changed the language to read "The information on this form may be filed with the petition or pleading and may be disclosed to the parties in the case unless accompanied by a nondisclosure finding/affidavit." Training Issue</p>
78	Foreign Country	General Testimony	<p>The General Testimony form also states: "THIS FORM CONTAINS SENSITIVE INFORMATION – IT IS RECOMMENDED THAT THIS FORM NOT BE FILED IN A PUBLIC ACCESS FILE." With very limited exceptions prescribed by provincial/territorial law or court order, provincial/territorial court records are public records. Since these court records are public, provinces and territories would be unable to process the incoming UIFSA applications in compliance with the notices on the form.</p>	Comment - Concern	Public Access File	<p>The heading highlights the sensitive information in the form and jurisdictions will apply their law regarding public record. The header also states "The information on this form may be filed with the petition or pleading and may be disclosed to the parties in the case unless accompanied by a nondisclosure finding/affidavit." Training Issue</p>
79	State	General Testimony	<p>Statement "This form contains sensitive information - do not file this form in public access file" - State confirmed with several courts that the General Testimony is filed but with restricted public access, it is only viewable by the parties or their attorneys.</p>	Comment - Concern	Public Access File	<p>Thank you for your comment; we agree. The heading highlights the sensitive information in the form and jurisdictions will apply their law regarding public record. Training Issue</p>
80	Organization	General Testimony	<p>We are concerned that the heading of this form states that the form is not to be filed in a public access file. It is likely that a paternity case would be confidential from public access , but a modification filed in a dissolution case may not be. If indeed this information is to be the sworn testimony of the absent party and therefore the means for testimony to be presented without his/her appearance, it must be filed with the court or at least admitted as evidence. Perhaps a request that this form not be served on the other party would help keep its contents from the other party without restricting its evidentiary use, for which the form is intended.</p>	Comment - Concern	Public Access File	<p>We have changed the language to read: "The information on this form may be filed with the petition or pleading and may be disclosed to the parties in the case unless accompanied by a nondisclosure finding/affidavit." Training Issue</p>

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81	State	General Testimony	In the Instructions under "Purpose of the Form", there is a bolded statement that indicates it is recommended that the form not be filed in a public access file. However, the sentence that follows indicates, "this form may not be filed or included in a record available to the general public." The language in bold is discretionary language, while the statement that follows clearly mandates the form is not be filed in a record available to the general public. We ask that the bolded statement be revised to be consistent with the statement that follows.	Consistency	Public Access File	The instructions have been amended to match the revised language on the form. The heading highlights the sensitive information in the form and jurisdictions will apply their law regarding public record. We changed the language on the second line to read "The information on this form may be filed with the petition or pleading and may be disclosed to the parties in the case unless accompanied by a nondisclosure finding/affidavit." Training Issue
82	State	General Testimony	Section VI contains information about what public assistance has been received and for what periods. The custodial parents filling this form out will probably have difficulty completing this section without assistance from the IV-D or IV-A agency. Furthermore, this information is supposed to be confidential. It is not relevant to establishing the amount of support because support should be based on the Guidelines for the period, not the amount of public assistance expended. It is only relevant if the custodial parent wishes to waive support for the period. If the custodial parent wants to waive it, it can be captured in VI(A)(4)(a).	Clarification	Public Assistance	We disagree with this comment The workgroup feels that receipt of TANF is needed information in cases where the petitioner is seeking retroactive support. Training Issue
83	State	General Testimony	Page 9, Section XI. Declaration: The descriptions associated with the name and signature areas for the Petitioner and the Agency or Tribunal Representative should be clarified. It is not always clear to State who in fact is the Petitioner. State recommends the following descriptions: a. "Type Name of Individual Petitioner" (Information about the Petitioner's title is not necessary and should be eliminated.) b. "Signature of Individual Petitioner" c. "Type Name and Title of Agency or Tribunal Representative" d. "Signature of Agency or Tribunal Representative"	Change	Signatures	We disagree with the suggested language change in the comment However, because of the number of comments received about the lack of clarity regarding how to complete the form if the petitioner is identified as the agency, we have revised the GT to be consistent with the Uniform Support Petition. The revised heading allows the initiating jurisdiction to identify in the heading a legal name for the petitioner and the respondent, and to identify whether each is the obligee or obligor. There is no longer a checkbox on the GT for the agency as a petitioner because such a checkbox is not on the Petition. Training Issue
84	State	General Testimony	Change signature field to: "Signature of Petitioner/Respondent" as obligor sometimes completes this form to request modification in the other state	Change	Signatures	We disagree with this comment We have revised the form so that the heading identifies whether the petitioner is the Obligee or the Obligor and whether the respondent is the Obligee or Obligor. If the obligor is seeking a modification, the obligor would be the petitioner in the case. Training Issue
85	State	General Testimony	Not enough space to hand-write required information. This form is provided to participants to fill out and return, and it is definitely not designed with that use in mind.	Comment - Concern	Space	Thank you for your comment. We have looked at space and added as much as possible. Training Issue
86	State	General Testimony	Too dense, trying to pack too much information in too little space.	Comment - Concern	Space	Thank you for you comment. We have looked at space and added as much as possible. Training Issue

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87	State	General Testimony	State uses spousal income in calculating child support. This has been removed from this form. We request it be added back.	Addition	Spousal Income	We disagree with this comment. Spousal income can be added under "other" if needed per state guidelines. See also response to comment 25. Training Issue
88	State	General Testimony	Page 1. Section I. Personal Information About Petitioner: The instructions say that the petitioner can be an individual or a state agency; however, this section is clearly intended for an individual. If the intent is that a state agency can be a petitioner, as in foster care or DJJ cases, there needs to be a separate section to identify the state agency.	Clarification	State Agency	We disagree with this comment. However, because of the comments received asking for clarification about how to complete the form if the identified Petitioner in Section I was a caretaker or a IV-D agency, we have revised the General Testimony in two ways. First, the heading now aligns with the Uniform Support Petition. For both the petitioner and the respondent, there are checkboxes in the heading to identify whether each is the obligee or the obligor. Second, we have revised Sections I and II. Section I now seeks personal information about the obligee (rather than the Petitioner) and Section II seeks information about the obligor (rather than the respondent). This revision ensures the responding tribunal has information about the individual parties, and identifies those individuals more clearly. Training Issue
89	State	General Testimony	Page 2. Section II. Personal Information About Respondent: (A) (1) identifies respondent as obligor or obligee. Guidance should be added to address what an agency does in cases of split custody where it may be unclear at the time of filling out the general testimony form which party will end up paying support.	Clarification	State Agency	We disagree with this comment. The form is designed for the majority of cases, and split custody cases are not common in intergovernmental cases. Training Issue
90	State	General Testimony	Section IV. Dependent Child(ren) in This Action (page 3). Can you add a state of birth block asking where the child was born? This would make it easier for responding state to request and obtain Voluntary Declaration of Paternity documents, birth certificates, etc.	Addition	State of Birth	We disagree with the comment to add a "state of birth" question to the General Testimony. That information is included in the new Child Support Agency Confidential Information Form. Training Issue
91	State	General Testimony	Section VII. Support Payment - We propose that an additional question or subsection question be added asking if payments are being made via military allotment.	Addition	Support Payment	We disagree with this comment. The form is designed for the majority of cases. We do not think it is necessary to add a question related to military allotments, which does not occur in most cases. We will amend the instructions for VII.D to state that direct payments may include military allotments if they do not go through the SDU. Training Issue
92	State	General Testimony	From an IT standpoint, it will be very difficult to integrate and implement the form into the system, particularly for states using older technology.	Comment - Concern	Systems Integration	We know that there will be technical challenges with systems to make the changes for all the forms. Training Issue

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93	State	General Testimony	Page 2—Section II., A.5.— “Unknown” should be added as an option	Addition	Tax Filing Status	We agree with this comment that the person completing the form may not know the filing status of the other party. A checkbox will be added for “Unknown” under I.A.4 and II.A.4.
94	State	General Testimony	#1 Under the Current Tax Filing Status can we have an unknown box? There will be instances when this information it not known. #2 Also, the parties marital status has been removed from the form. Was the tax filing status question supposed to replace this information? There will be times when the party completing this form knows whether the other person is married but will not know what their tax filing status is. The Petitioner and Respondent’s marital status needs to be on this form or the PII form.	Addition	Tax Filing Status	We agree with the first comment. We will add a checkbox for “Unknown” under I.A.4 and II.A.4. We disagree with the second comment. In most cases you do not need to know the marital status to implement the guidelines. Training Issue
95	State	General Testimony	Under Section V(A)(e) and (f), we ask that consideration be given to asking whether there is a court order identifying the person authorized to claim the child for federal tax purposes.	Addition	Tax Filing Status	We agree with this comment We will add an instruction to the General Testimony that if there is an order identifying who is authorized to claim the child for federal tax purposes, the order should be attached. Training Issue
96	State	General Testimony	Page 4 of instructions, Part A – Item 5: - clarify when this information is to be provided (example – modification).	Addition	Tax Filing Status	We disagree with this comment. The instructions are clear. Training Issue
97	State	General Testimony	Section IV does not ask for Tribal affiliation and the basis for the affiliation. This information would be beneficial to State.	Addition	Tribal Affiliation	We disagree with this comment. Tribal affiliation is included in Section IV - item 7. Training Issue
98	State	General Testimony	I. Personal Information About the Petitioner, Question C - An “unknown” box should be included.	Addition	Unknown Financial Responsibility	We agree with this comment. Because we have revised the General Testimony so that sections I and II relate to the obligee and obligor, rather than the petitioner and respondent, we have added a checkbox for “unknown” in both I.C and 1.D so that it is similar to the checkbox in II.C and II.D. Training Issue
99	State	General Testimony	I. Personal Information About the Petitioner, Question D - An “unknown” box should be included.	Addition	Unknown Order for Child Support	We agree with this comment. Because we have revised the General Testimony so that sections I and II relate to the obligee and obligor, rather than the petitioner and respondent, we have added a checkbox for “unknown” in both I.C and 1.D so that it is similar to the checkbox in II.C and II.D. Training Issue
100	State	General Testimony	Section VIII asks for financial information. At the beginning of the section, it points out that “Information required varies based on responding jurisdiction support guidelines.” We think this could technically apply to the whole General Testimony form. Therefore, we suggest rewording and moving this language somewhere near the top of the form. Suggested language is: “Information required may vary among responding jurisdictions. Updates or clarifications may be required.”	Change	Varies based on responding jurisdiction	We disagree with this comment The testimony reflects the information that most jurisdictions indicate that they need. Training Issue

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101	State	General Testimony	Under sections I and II, Personal Information About Petitioner/Respondent, should A(5) state "Qualifying widow", not "Qualifying widower"?	Addition	Widow/Widower	We agree with the comment. We have changed the form to read "Qualifying widow/widower with dependent children". Training Issue
102	State	General Testimony	In the Instructions, page 2, Part A, Item 5 and page 4, Part A, Item 5, refer to one of the labels as "qualifying widow", but the term used on the form is "qualifying widower". We believe both "qualifying widow" and "qualifying widower" should be included on the form and the Instructions.	Addition Consistency	Widow/Widower	We agree with the comment. We have changed the form to read "Qualifying widow/widower with dependent children". Training Issue
103	State	General Testimony	Under Section I(A)(5) and II(A)(5), the final option should be labeled "Qualifying widow or widower with dependent children".	Change	Widow/Widower	We agree with the comment. We have changed the form to read "Qualifying widow/widower with dependent children". Training Issue
104	State	General Testimony	Financial/workload impact on CSAs, due to the time it will take to complete the form, as well as the need for the form to be reviewed by the CSA.	Comment - Concern	Workload Impact	We appreciate the comment, however there was no recommendation as to what increased time it would take to complete the form. Training Issue
105	Organization	General Testimony	I & II Personal Info About Petitioner & Respondent - 2. Caretaker relationship to child is: _____ [] Has legal custody/guardianship of child; (<u>orders attached</u>). The prompt to attach orders would be helpful.	Addition		We disagree with this comment. In most cases the responding tribunal does not need a copy of any order giving the caretaker legal custody or guardianship. If the petitioner wants to provide such information, the petitioner can check the appropriate box in Section X governing attachments.. Training Issue
106	State	General Testimony	Want instructions to give guidance on who is petitioner and who is respondent.	Addition	gender	The designation of petitioner or respondent is a state system or state pleading issue. We added check boxes to indicate if the petitioner and respondent is the obligee or obligor in the heading to help with clarification. Training Issue
107	Organization	General Testimony	I & II Personal Info About Petitioner & Respondent - Terminology "petitioner" and "respondent" should be changed to "parent 1" and "parent 2". This form is an information form to share information about the parents who have a duty to support the children in the case. We need both parents' income to calculate support and sometimes "petitioner" is a caretaker .	Change		The designation of petitioner or respondent is a state system or state pleading issue. We added check boxes in the heading to indicate if the petitioner and respondent is the obligee or obligor to help with clarification. The caretaker should also provide any relevant non-party parent information in section IX (Other Pertinent Information). Such information includes financial information about the non-party parent, which may be needed for the support guideline calculation. We have added appropriate direction on the form and in the instructions. There is also information about both parents in the Child Support Agency Confidential Information form Training Issue

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General Testimony

108	State	General Testimony	Under the directions for the General Testimony, Section IV, Item 3: We feel there should be a clarification for out of pocket expenses paid. See response to comments	Change		We disagree with this comment. We think the Instructions are clear. Additional information, if desired, can be included in section IX Other Pertinent information. See responses to comments 6 & 7.
109	State	General Testimony	Page 2 of instructions, box 1 – rework sentence 1 as we do not provide SSN or full DOB in the GT.	Change		We disagree with this comment. The language in the textbox reflects the requirement in UIFSA, which is implemented using the Child Support Agency Confidential Information Form and the Personal Information Form for UIFSA 311. Training Issue
110	State	General Testimony	Too much is being requested on this form — is all information on the form necessary? We are also concerned that other states might reject it if the form is not fully completed.	Comment - Concern		We appreciate your comment. Training Issue
111	State	General Testimony	Page 1, between the caption and Section I., in the declaration, before the space for the petitioner to write his or her name, the word "I" needs to be added. This is a similar declaration as to what is found on the Declaration in Support of Establishing Parentage; therefore it should be standardized	Consistency		We agree with this comment. We will make the two consistent and use: "I, _____, declare under penalty of perjury:" Training Issue
112	State	General Testimony	V. Health Care Coverage - We would propose changing the order of the parties to Petitioner, Respondent and then children. Also, since the health care coverage is often the same for each child, we would like the option to choose a box that simply states "Same as child one". If the information is the same information as the Petitioner or Respondent, an option of "Same as Petitioner" and "Same as Respondent" may also eliminate the need to enter repetitive information. We like the expanded detailed selections listed under both the children and Petitioner/Respondent as to how health care coverage is currently being provided and by who (Individual policy, employer, Medicaid, CHIP, TRICARE.)	Comment - Supportive	Health Care Coverage	Thank you for your comment. See response to comment #42. Training Issue
113	State	General Testimony	Section IV. Dependent Child(ren) in This Action - If there is only one child on the case but there is space for three on this form, can the form be condensed to only include the fields for the one child, omitting the other two child fields? Can we condense the form for number of children or do we have to stay true to the form layout? We support the detailed request for SSA/VA benefit information -type of benefit, amount, on whose claim. Not only is this information important for establishment and modification of right-sized orders, it will also be useful for enforcement. State grants the obligor credit towards his/her current support obligation for the benefit the child receives on the obligor's claim.	Comment - Supportive	More than 3 Children	Thank you for your comment. See response to comment #60. Training Issue
114				OCSE Change		Removed the "Other" section from VI.A.d. After much discussion the workgroup did not see a purpose for this to stay.

0970-0085 - Attachment 2
 General Testimony

115				OCSE Change		Removed section VI.B.1 and added a parenthetical direction, "If a child support order exists that the petitioner seeks to modify, complete the following section: " The workgroup did not see a need to break down the type of orders since that information is provided on the Letter of Transmittal Requesting Registration.
116				OCSE Change		Removed "Separated" as an option in section III because physical separation does not establish or affect the legal relationship of parents of children.
117				OCSE Change		Removed the totals from section VII.A.2. After lengthy discussion the workgroup decided that the totals were not useful since state guidelines vary in how they calculate gross and net income.
118				OCSE Change		Changed reference from "insurance company/carrier name" to "health care coverage provider name"

0970-0085 - Attachment 2
Locate

#	Submitted By	Form	Comment	Category	Common	Comments/Notes
1	State	Locate Data Sheet	There is no option in the heading of the form to indicate "PII form attached", as is available on other forms. However, the Purpose Form to the Child Support Locate Data Sheet, under Rationale, seems to anticipate a PII Form would be attached, as all PII from Section I of the Sheet was moved to the new PII form. Is it OCSE's intent that a PII form would be attached to a Locate Data Sheet or was this additional information deemed not necessary to process locate requests?	Comment - Concern	Attach PII	We disagree with this comment. This form is a request for information, not a response to a locate request. OCSE did not intend for the PERSONAL INFORMATION FORM FOR UIFSA § 311 or the CHILD SUPPORT AGENCY CONFIDENTIAL INFORMATION FORM to be attached to the Locate Data Sheet.
2	State	Locate Data Sheet	Question: Does the Responding Agency send the PII form back with locate info? Does the Initiating Agency send it along with the Locate Data Sheet?	Question	Attach PII	The response to both questions is no. OCSE did not intend for the PERSONAL INFORMATION FORM FOR UIFSA § 311 or the CHILD SUPPORT AGENCY CONFIDENTIAL INFORMATION FORM to be attached to the Locate Data Sheet.
3	State	Locate Data Sheet	The Instructions to this Sheet provide that CSENet transactions are the recommended method for sending information to another state; however, the heading of the Sheet indicates "Use CSENet if Agreement is in place". Per the direction in the heading, is the use of CSENet mandatory for locate requests when an Agreement is in place? If so, we ask that the instructions be revised to be consistent with the Sheet. We believe it should be mandatory.	Comment - Concern	CSENet	Thank you for your comment. The CSENet language has been updated and should be clear that CSENet is to be used when an agreement is in place.
4	State	Locate Data Sheet	Section II. Other Pertinent Information - While a Social Security Number suffices for locate purposes in the states, this field would be important for additional demographic information when there is no Social Security Number or when the request is being sent to a foreign country.	Comment - Concern	Foreign Country	We agree with this comment. If locating someone outside the US, other pertinent information may be needed and there is space provided on the form for this.
5	State	Locate Data Sheet	We do not understand what the form is referring to with the term, "Requesting Member Identifier."	Clarification	Member Identifier	We agree with this comment. The member identifier will be deleted..
6	State	Locate Data Sheet	The last known address and employer information should be added back to this form. The purpose of the form is to aid in the location of noncustodial parents.	Addition	Needed Information	We disagree with this comment. This information is not needed for a locate request.
7	State	Locate Data Sheet	Under Section I. Locate, in the Full Name box, please add former married name to improve the chances of locating an individual.	Addition	Needed Information	We disagree with this comment. There is a field called "Alias" that addresses this. We will add former married name as an example in the instructions.
8	State	Locate Data Sheet	The changes to the Locate Data Sheet do not give the responding agency space to return the needed information. We suggest adding the fields for the person's address, employer, etc. back onto this form.	Change	Needed Information	We disagree with this comment. This form does not address the information returned from the requested state and never has.

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Locate

9	State	Locate Data Sheet	<p>The new design in section II only asks for "other pertinent information". One of the main objectives of a Locate Data Sheet is to obtain an address or employer. There should be no mistake about what the requesting state needs. Changing it to "pertinent information" in my opinion is a mistake. It also is utilized to request locate information from a foreign reciprocating country. The reciprocating country needs to be aware that the requesting country needs a current address and employer in order to successfully enforce the case...and not just "pertinent information". The last know address and last known employer field should not be deleted from the existing form.</p> <p>From email: I do not like the fact they took the last known address and last known employer section out on the proposed new locate data sheet. The only objective for sending a locate data sheet is to obtain an address and/or employer. The new form now has a section "other pertinent information". Should the sender now manually mark the form "please provide a last known address and/or employer" sine there is no reference to either of those on the proposed form anymore...? We send the locate data sheet to other countries too. Will the receiving entity understand that we mean address and employer with" other pertinent information" ?</p>	Comment - Concern	Needed Information	We disagree with this comment. It is not needed for a locate request.
10	State	Locate Data Sheet	<p>We suggest removing the "Nondisclosure Finding/Affidavit" field from this form and the instructions. Most states respond to locate requests electronically and will not be able to electronically attach the Nondisclosure Finding/Affidavit. Also, we assume the state that initially requests the information will check the Nondisclosure Affidavit field if appropriate, but that state is requesting information and not releasing information.</p>	Comment - Concern	Nondisclosure	We agree with this comment. This is an internal IV-D form subject to OCSE safeguarding regulations. We have removed the "Nondisclosure Finding/Affidavit" field.
11	State	Locate Data Sheet	<p>Nondisclosure Finding/Affidavit - Would this be applicable for this form? How can you request information to locate a parent who is owed support if there is a nondisclosure finding that limits information you can provide?</p>	Question	Nondisclosure	We agree with this comment. This is an internal IV-D form subject to OCSE safeguarding regulations. We have removed the "Nondisclosure Finding/Affidavit" field.
12	State	Locate Data Sheet	<p>There needs to be a place to add the physical description information. It is used a lot by our parent locate department to help make sure they are looking for the correct person.</p>	Addition	Physical Description	<p>We disagree with this comment. Physical description was removed from the form by the workgroup. We have added the following statement to "Other Pertinent Information": General identifying information may include physical description, nationality, passport or national identification number, place of birth, gender, mother's maiden name, father's name, current spouse's name, last known address, telephone number, and employer in the other country.</p>
13	State	Locate Data Sheet	<p>Our locate specialists have also stated that it would be extremely helpful to attach a list of a few of the older addresses that you know are no longer good so you are not supplying the requestor with information that they already have tried.</p>	Addition	Prior Address	We disagree with this comment. This information is not needed for a locate request.
14	State	Locate Data Sheet	<p>If the parent is deceased, the location of a current spouse or relative has been requested.</p>	Addition		We disagree with this comment. The need for this information would be rare.

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Locate

15	State	Locate Data Sheet	State would like the instructions for Section II "Other Pertinent Information to include "other identifying information" such as tattoos, scars, other distinctive features, and alias information.	Addition - I		We agree with this comment. We have added the following to "Other Pertinent Information": General identifying information may include physical description, nationality, passport or national identification number, place of birth, gender, mother's maiden name, father's name, current spouse's name, last known address, telephone number, and employer in the other country.
16	State	Locate Data Sheet	It would be helpful if the instructions for Section III provided a list of documents which would be helpful and pertinent to locate.	Addition - I		We disagree with this comment. The work group considered this issue when drafting the form and decided against including such a list.
17	State	Locate Data Sheet	This form would have extremely limited usage in most states.	Comment - Concern		Thank you for your comment. We understand that most states do this electronically. But the form is still used by some states, so the form was retained.
18	State	Locate Data Sheet	In the Instructions, page 1, third italicized text box, the label "IV-D case identifier" is not consistent with the corresponding label on the form, "Requesting IV-D Case Identifier". For clarity purposes, we believe the label used in the instructions should be verbatim with the label used in the form.	Consistency		We agree with this comment. The text box has been changed to read ""Requesting IV-D Case Identifier".
19	State	Locate Data Sheet	In our experience this form is seldom used, and most of the instances in which it is being used, it is being used primarily to shift basic locate work from the caseworker onto another state. Technology has for the most part eliminated state lines for purposes of locate.	Statement		Thank you for your comment. We understand that most states do this electronically. But the form is still used by some states, so the form was retained.
20	Workgroup	Locate Request				We have changed the form name to Child Support Locate Request to help clarify the purpose of the form. Training Issue.

Old Personally Identifiable Information

New Child Support Agency Confidential Information Form and Personal Information Form for UIFSA 311

#	Submitted By	Form	Comment	Category	Common	Comments/Notes
1	State	Personally Identifiable Information CIF PIF	This form provides a place to list information for only three children. State would appreciate an addendum page that provides the same formatting to use if there are more than three children.	Change	3 children	We disagree with this comment. Given the form has a checkbox to allow for additional children, the state systems can program for the system to prompt for additional children. We modified the beginning of the Child(ren) Section on each form to state: "Identify all of the children for whom support is owed or being sought. For each child, enter:" In the instructions, we also clarified the statement at the end of the section to read "Check "Additional Child(ren) Information Attached" when support is owed or being sought for more than three children or if additional space is needed."
2	State	Personally Identifiable Information CIF PIF	Idaho needs clarification, what would be appropriate to use, if the family has more than three children, since the PII form only has room for three children to be listed. Would a second PII form be needed? Can instructions be updated to make this clear?	Clarification	3 children	Thank you for your comment. We have added information on the form and in the instructions about how to provide information for more than three children.
3	State	Personally Identifiable Information CIF PIF	We would like some clarification in the directions as to how to add additional children.	Clarification	3 children	Thank you for your comment. See response to comment #2.
4	State	Personally Identifiable Information CIF PIF	Instructions - On page 3, section 4, sentences 2 & 3. "If additional space is needed please attach to this form. For each child:" This does not make sense and is not consistent with how this is worded in other forms.	Comment - Concern	3 children	We agree with this comment. See response to comment #1.
5	State	Personally Identifiable Information	PII should include a line item number(s) for placing the obligor's bank account number, routing number and bank name. This would be helpful should a state receive an AEI request that involves freezing or seizing of the obligor's assets from a financial institution.	Addition	Bank Information	We disagree with this comment. AEI requests need to be processed using other form documentation and procedures. We do not agree that bank account information and additional financial information should be on the Child Support Agency Confidential Information Form or the Personal Information Form for UIFSA 311.
6	Organization	Personally Identifiable Information	Under section 2 petitioner/respondent info - recommend adding check box indicating (additional information attached). Sometimes descriptions and additional locate sources are helpful; or income/financial information,	Addition	Financial Information	We disagree with this comment. Additional information would generally be in the pleadings or supporting documents, e.g. General Testimony. We do not think the Child Support Agency Confidential Information Form or the Personal Information Form for UIFSA 311 is the place to attach additional information.

Old Personally Identifiable Information

New Child Support Agency Confidential Information Form and Personal Information Form for UIFSA 311

7	Organization	Personally Identifiable Information	Section 3 CTR info - add a checkbox to alert that [] (financial info is attached)	Addition	Financial Information	We disagree with this comment. Financial information for the caretaker is usually not required.
8	State	Personally Identifiable Information CIF	Because all the children may not reside with a caretaker, we suggest adding a field to Section 3. Caretaker Information, to list which children reside with the caretaker.	Addition	Caretakers	We disagree with this comment. The caretaker information is provided relative to that individual's role as the obligee for the child[ren] whose support is at issue in the case.
9	State	Personally Identifiable Information CIF	Instructions Page 2: Section 3 form Caretaker Information: Place of Birth (city, county, state) for the Caretaker should be removed. (Irrelevant information)	Change	Caretakers	We agree with this comment. The caretaker's place of birth will be removed from the form.
10	State	Personally Identifiable Information CIF	Instructions Page 3: Section 3 Caretaker Information: Employer name, Date Employer confirmed and Employer Address should be removed. (Irrelevant information).	Change	Caretakers	We agree with this comment. We will remove the caretaker's employer name, date employer confirmed and employer address from the form and the instructions.
11	Organization	Personally Identifiable Information	Section 3 CTR info - remove employer info. Agencies don't need this information for Caretakers . Employment and income information is only relevant for parents.	Change	Caretakers	We agree with this comment. See response to comment #10.
12	State	Personally Identifiable Information	We suggest removing "Parent" from the top of both columns in Section 2, Petitioner and Respondent Information. The person originally ordered to receive child support could be a caretaker and not a parent.	Change	Caretakers	We partially agree with this comment. We will combine Parent and Caretaker and put the following as part of the Caretaker on both the Child Support Agency Confidential Information Form and the Personal Information Form for UIFSA 311: "Caretaker - Obligee (When obligee is not the child(ren)'s parent)"
13	State	Personally Identifiable Information	The instructions for Section 2 of the PII form pertaining to Petitioner and Respondent Information say to 'Identify each parent as the obligee or obligor.' If the obligee is a caretaker, however, it is unclear to us how Section 2 should be completed since Section 3 contains information about the caretaker. Should both Section 2 and 3 be completed if the caretaker is the respondent? It is also unclear whether there is an expectation in caretaker cases for states to identify and provide information about both parents even though only one parent is a party to the case sent to the responding jurisdiction. Recommendation: In Section 2 of the form change 'Parent [] Obligee or [] Obligor' in the columns to 'Petitioner []Obligee or []Obligor' in the first column and 'Respondent []Obligee or []Obligor' in the second column. Section 2 includes a field that identifies the petitioner and respondent's relationship to the children, which would indicate if the respondent or petitioner is a caretaker. Adopting this change would also bring the PII form more in line with the structure of the other related UIFSA forms as it relates to identifying the parties involved, their role, and relationship to the child.	Change	Caretakers	We partially agree with this comment. See response to comment #12.
14	State	Personally Identifiable Information	Page 2. Section 3. Caretaker Information: Having this separate section for non-parent caretakers is confusing and unnecessary since if there is a caretaker, the caretaker will be the obligee and will be either the petitioner or the respondent. Additionally, the columns do not indicate if the first or second column is the petitioner or respondent, so it may be confusing to have the first column completed only for the respondent and then have the separate section completed for the caretaker.	Clarification	Caretakers	We partially agree with this comment. See response to comment #12.

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New Child Support Agency Confidential Information Form and Personal Information Form for UIFSA 311

15	State	Personally Identifiable Information	Page 2, Section 3, "Relationship to child" should be changed to "Relationship to child(ren)".	Change	Caretakers	We agree with this comment. We have changed "Relationship to child" to "Relationship to child(ren)" for both the parent and caretaker on the Child Support Agency Confidential Information Form.
16	State	Personally Identifiable Information	Form Section 3 Caretaker Information: Relationship to Child on form, should match instructions and read: Relationship to Child(ren).	Consistency	Caretakers	We partially agree with this comment. See response to comment #12.
17	Organization	Personally Identifiable Information	"this form sent through EDE/CSENET" - We are unclear about the purpose of this? (this comment is true for each of the new forms) When agency has the information, it isn't necessary to distinguish how it was sent. (unless you are acknowledging that information transmitted through CSENET may not be the same as intended by sender? However it is very useful to indicate that ADDITIONAL information was forwarded by EDE.	Clarification Question	CSENet	We disagree with this comment. This instruction was put on the form to make the receiving state aware that the hard copy form was also sent through EDE. CSENet is not an option at this point because this is a new form.
18	Organization	Personally Identifiable Information	Instructions - regarding CSENET as a preferred method of sending information. Many states do not use CSENET and programming has been inconsistent. Implementation of these changes will cost a significant amount that could be invested in a system that works. The IV-D program should be moving toward a secure portal housed case management system.	Statement	CSENet	We agree with this comment. We added the following statement to the instructions for all forms as the second sentence in #1 for the text box starting with "The following options are available for making IV-D requests and sending information on IV-D cases:".
19	State	Personally Identifiable Information	We suggest collecting a "preferred" e-mail address rather than collecting both personal and work e-mail.	Addition Change	e-mail	We agree with this comment. We changed the Child Support Agency Confidential Information Form to seek only one e-mail and the instructions say "Preferred e-mail address for communication".
20	State	Personally Identifiable Information	Form Section 4 Child(ren) Information: form shows Name (first, middle, last) Instructions show Name (last, middle, first).	Consistency	first, middle, last	We agree with this comment. All forms and instructions should state "(first, middle, last, suffix)".
21	State	Personally Identifiable Information	Instructions Page 2: Section 2 form -Petitioner and Respondent Information: form shows Name (first, middle, last) Instructions show Name (last, middle, first)	Consistency	first, middle, last	We agree with this comment. See response to comment #20.
22	State	Personally Identifiable Information	Instructions Page 2: Section 3 form - Caretaker Information: form shows Name (first, middle, last) Instructions show Name (last, middle, first).	Consistency	first, middle, last	We agree with this comment. See response to comment #20.
23	State	Personally Identifiable Information	Instructions - The draft instructions list the name formats as last, middle, first for all names on this form. The form correctly has the order of first, middle, last name.	Consistency	first, middle, last	We agree with this comment. See response to comment #20.

Old Personally Identifiable Information

New Child Support Agency Confidential Information Form and Personal Information Form for UIFSA 311

24	State	Personally Identifiable Information	#1 - Section 2. Petitioner and Respondent Information - We do not recommend using the side-by-side format as we feel separation is needed to make the form easier to read. We suggest using a format similar to the current Child Support Enforcement Transmittal #1-Initial Request form where all information is provided on the first Parent and information on the second parent is below. If kept side-by-side, we suggest adding a space in- between the columns to add separation. We like the separate home and mailing addresses. We like the addition of the cell phone#. Many people no longer have home phone# in this cellular age. #2 - The addition of incarceration information is very helpful but we would also like to add a field of "minimum release date." Knowing the period of possible incarceration can help with possible case closure, service of documents and entering right-sized obligations.	Changes	Form Format	We disagree with this comment. Comment #1 - the workgroup decided to keep the side-by-side format. It works well for this form. Comment #2 - the workgroup thought that it would be complicated and burdensome to complete so we disagree with adding "minimum release date".
25	State	Personally Identifiable Information	We suggest a more simplified name/title for the document, such as "Participant Data Face Sheet."	Change	Form Names	We partially agree with this comment. With the comments received we have chosen to split the PII Form into two documents. The first is the Personal Information Form for UIFSA 311, which contains only the required fields for UIFSA 311. The second is the Child Support Agency Confidential Information Form which contains the additional information from the old PII Form and is only for use with IV-D cases.
26	State	Personally Identifiable Information	The form name at the top of the form and the bottom of the form need to match.	Consistency	Form Names	We agree with this comment. We have made sure on all forms that the name at the top of the form and the bottom of the form match.
27	State	Personally Identifiable Information	The PII Form is titled differently on the form than it is on the Instructions. We believe the PII Form should be entitled "Child Support Enforcement Personal Identifiable Information (PII) Form" to be consistent with the Instructions and the other forms.	Consistency	Form Title	We agree with this comment. See response to comment #25.
28	State	Personally Identifiable Information	We have a suggestion for the PII form. The IRS insists that information on a transmittal from another state may be considered FTI, which then requires a tracking log, and etc. Rather than trying to track this information, perhaps the PII Form could have a place for a source identifier code so we know whether or not the information may be FTI. This would be needed for the Birthday, SSN, Home Address, and Mailing Address.	FTI	IRS Rules	We disagree with this comment. We are confident that the state IV-D agencies are aware of their responsibilities regarding FTI and that any data elements originally obtained through the IRS will be verified by a second source before being disclosed.
29	Organization	Personally Identifiable Information	Locate information - method of verification would be helpful. Different sources are differently credible.	Addition	Method of Verification	We disagree with this comment. It is too burdensome for IV-D agencies to list the source of each data element and this information is not on the current forms.
30	State	Personally Identifiable Information	State suggests that OCSE also consider developing a universal or federally approved non-disclosure affidavit that can be used by states to accompany the PII when appropriate.	New Form	Nondisclosure	We disagree with this comment. The issuance of ex parte orders in family violence cases is specific to state law and rules. Training Issue

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 Old Personally Identifiable Information
 New Child Support Agency Confidential Information Form and Personal Information Form for UIFSA 311

31	State	Personally Identifiable Information	Section 4, Child's Info: Instead of "Non-Marital Birth, Y or N" would prefer "Marital Birth, Y or N."	Change	Non-Marital Birth	We disagree with this comment. The language is laid out to assist states with the PEP process.
32	State	Personally Identifiable Information CIF	4. Child, Non-Marital birth - The question should parallel OCSE 157 language (i.e., wedlock).	Consistency	Non-Marital Birth	Thank you for your comment. We have discussed this with the group responsible for the OCSE-157 and they have approved the language on the form.
33	State	Personally Identifiable Information	Page 2, Section 4, it appears genetic testing should be added to the section "Parentage established by".	Addition	Parentage Established	We disagree with this comment. Genetic testing is evidence used to establish parentage. While properly administered genetic test results may result in a presumption of parentage (i.e. shift the burden of proof), they do not establish parentage.
34	State	Personally Identifiable Information CIF	Page 2. Section 4. Child (ren) Information: We suggest adding the state where paternity was established.	Addition	Paternity Establishment State	We agree with this comment. We have added the state where parentage was established to the Child Support Agency Confidential Information Form.
35	State	Personally Identifiable Information CIF	In section #4 Child(ren) Information, State requests OCSE add a field in which the preparer will provide the "state" in which paternity was ordered, acknowledged, etc. This information is helpful for a variety of reasons, including assisting states with obtaining proof or copies of paternity information from the appropriate state.	Addition	Paternity Establishment State	We agree with this comment. See response to comment #34.
36	State	Personally Identifiable Information CIF PIF	Instructions Page 2: Section 2 form- Petitioner and Respondent Information: Place of Birth (city, county, state) for the Petitioner and Respondent should be removed. (Irrelevant information).	Change	Place of Birth	We disagree with this comment. This information could be helpful to identify or locate the individual.
37	Organization	Personally Identifiable Information CIF	Section 4 children info - need check box prompting attachment of proof of establishment. Paternity establishment is a legal conclusion which must be proved before moving on to support establishment; attaching it can prevent delay.	Addition	Proof of Establishment	We disagree with this comment. The information on parentage establishment in the Child Support Agency Confidential Information Form is sufficient for audit purposes in the responding state (no additional documentation is necessary.) The Transmittal 1 includes the option to attach proof of parentage if a state believes this is necessary.
38	Organization	Personally Identifiable Information CIF PIF	Section 2 - add check box for "putative parent" to "obligee" and "obligor" for cases needing establishment.	Addition	Putative Parent	We disagree with this comment. UIFSA defines obligor to include an individual alleged to owe a duty of support and an individual who is alleged but has not been adjudicated to be a parent of a child. The Act does not use the term "putative."

Old Personally Identifiable Information

New Child Support Agency Confidential Information Form and Personal Information Form for UIFSA 311

39	State	Personally Identifiable Information CIF PIF	In view of the data elements above that we do not collect or store, we are concerned with "incomplete" packets being returned, and what defines an incomplete packet based on information that is required on the PII. Additional instructions, or asterisks alongside required fields of information, or some other indication of fields that are required versus not-required, would be helpful.	Addition	Required Fields	We disagree with this comment. Federal regulations require a state to process a case to the extent possible and to request any additional information (see 45 CFR 303.7(d)). States should not reject cases, due to an incomplete form.
40	State	Personally Identifiable Information CIF PIF	Page 3, Section 4 – why/when is child's address required? Clarify in instructions.	Addition	Required Fields	We disagree that this clarification needs to be added to the instructions. The home address of the child[ren] is a required element in the petition or supporting documents in a UIFSA proceeding "seeking to establish a support order, to determine parentage of a child, or to register and modify a support order of a tribunal of another state or a foreign country..." UIFSA § 311(a).
41	State	Personally Identifiable Information CIF PIF	Clarify or offer guidance on which fields of the PII are required. SES notes that the PII form includes and requires new information that previously was not required in the OCSE intergovernmental requests. Moreover, the requested information may not be readily available and will require manual research. For example, the PII form requests the "place of birth" for the petitioner (or caretaker), and respondent. This information was not previously requested or required in an action such as the registration of a foreign order for enforcement. State does not currently record this information and cannot easily provide. Similarly, the PII form request "date of marriage" for children reported as marital. The most recent court order court being registered may not include that date and state does not currently record that as a separate and distinct data field. Can State B reject our states request to register and enforce a our order because our state did not include the "caretaker's" place of birth on the now required PII form?	Clarification	Required Fields	We believe the Child Support Agency Confidential Information Form and the Personal Information Form for UIFSA 311 data elements should be completed if the information is available. States should not reject cases, however, due to an incomplete form.
42	State	Personally Identifiable Information CIF PIF	Suggest Initiating and Responding States' names be added to the form (could be placed beside the initiating/responding case identifier)	Addition		We agree with this comment. This helps with identification of case and the names have been added to both the Child Support Agency Confidential Information Form and the Personal Information Form for UIFSA 311.
43	State	Personally Identifiable Information CIF	State CSE only collects one email address and this is the address that is also associated with our customer portal. So that we are not trying to figure out which email address (personal or work) a person wants us to communicate with them through, it would be best to only collect one email address from the Petitioner, Respondent and Caretaker. The person would need to provide to us the best email address to use for communicating with them. If the decision is to keep the two email addresses on the form, then a check box to indicate which address they want us to use would be helpful. This will ensure we load the correct one in our system.	Addition		We agree with this comment. See response to comment #19.

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New Child Support Agency Confidential Information Form and Personal Information Form for UIFSA 311

44	State	Personally Identifiable Information CIF PIF	Language added that indicates that this form is for administrative purposes only.	Addition		We resolved this comment by making two forms. The Child Support Agency Confidential Information Form is for IV-D agency use only. The Personal Information Form for UIFSA 311 meets the UIFSA requirements.
45	State	Personally Identifiable Information CIF PIF	Instructions Page 2: the first row / first word is missing the letter "I".	Change		We agree with this comment. We have added the missing letter.
46	State	Personally Identifiable Information CIF PIF	Instructions Page 3: Section 4 Child(ren) Information: Instruction for parentage reads backward from the form. Recommend the 8th bullet read as follows: If "Yes", enter the date parentage was established and check the appropriate box – by order, by voluntary acknowledgment, by adoption, or other (include explanation, if other) or check the box Parentage not established.	Change		We agree with this comment. We have revised the instructions to be consistent with the language on the form.
47	Organization	Personally Identifiable Information CIF PIF	Instructions - typo top of page 2 (should be "in")	Change		We agree with this comment. See response to comment #45.
48	State	Personally Identifiable Information CIF PIF	We do not store or collect the information below: o Participant's e-mail address o Caretaker's employment details o Children's address	Change		Thank you for your comment. The caretaker employer has been deleted and determined not to be necessary. However the children's address must be provided and the e-mail was added because of multiple comments requesting this field. In the revised form we reduce the number of e-mails to one and this should be the primary e-mail. State systems may need to be modified to capture these fields.
49	State	Personally Identifiable Information CIF PIF	Typo on top of page 2 of instructions (n is typed instead of the word In)	Change		We agree with this comment. See response to comment #45.
50	State	Personally Identifiable Information CIF PIF	Page 2. Section 4. Child (ren) Information: Child's Name is the field identifier but on three other forms—Transmittal 1- Initial request, Change of Payment Location, and Transmittal 3-Request for Assistance—the terms used are "Full Legal Name" or "Children's Legal Names." We recommend consistency throughout. Also, the colon should be removed after the word "Gender." There is no colon after the word "Gender" on the rest of the form.	Consistency		We agree with this comment. We have chosen the term "legal name" and this should now be consistent across all the forms. We have also standardized the use of colons on the form.
51	State	Personally Identifiable Information CIF PIF	Instructions - On page 2 of the instructions, we suggest changing "n the space provided enter:" to "In the space provided enter:."	Consistency		We agree with this comment. See response to comment #45.
52	State	Personally Identifiable Information CIF PIF	Instructions - On the top of page 2, the "I" is missing in the sentence "n the space provided enter:.", this should read "In the space provided enter:."	Consistency		We agree with this comment. See response to comment #45.

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53	State	Personally Identifiable Information CIF PIF	Section IV Children Information - Under options for "Parentage Established by" change the "Voluntary Acknowledgment" to "Acknowledgment of Parentage" to remain consistent with other forms.	Consistency		We agree with this comment. The term has been changed to "Acknowledgment of Parentage" on all forms.
54	State	Personally Identifiable Information PIF	The state makes a general observation that the PII form does remove all personal identifying information from intergovernmental forms and pleadings and potentially may present problems or issues in fact pleading judicial states.	Comment - Concern	All PII not removed	<p>Thank you for your observation. To address this issue we have split the PII form into two documents: The Child Support Agency Confidential Information Form for IV-D agency use only and the Personal Information Form for UIFSA 311. We have also made it clear when each form is to be used.</p> <p>We believe the Personal Information Form for UIFSA 311 form addresses your concern. The form provides information to the responding tribunal that is required under § 311(a) of UIFSA, stating that:</p> <p>The petition or accompanying documents must provide, so far as known, the name, residential address and social security numbers of the obligor and the obligee or the parent and alleged parent, and the name, sex, residential address, social security number, and date of birth of each child for whose benefit support is sought or whose parentage is to be determined.</p> <p>The first notice on the form "DO NOT PLACE THIS FORM IN A PUBLIC ACCESS FILE" is for 3rd parties that have authorized access to the information on the form under state law, such as the IV-D agency, courts, and other government entities. The notice alerts the IV-D agency and the tribunal that the information contained in the form should not be placed in a file or portion of a file that is accessible to the general public in any format, whether hardcopy or electronic.</p> <p>If there is a nondisclosure finding/affidavit, a state should still send the Confidential Information Form and other relevant forms for processing an intergovernmental case. However, the Confidential Information Form and other identifying information listed by the party may not be disclosed to the other party or be available to the general public. If the nondisclosure is contested, according to UIFSA § 312, the tribunal must hold a hearing. The tribunal may order disclosure of identifying information if, after considering "the health, safety, or liberty of the party or child," the tribunal determines that disclosure is "in the interest of justice."</p>

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55	State	Personally Identifiable Information CIF PIF	We appreciate and support the development of the PII Form. However, we are concerned that it is not entirely clear when inclusion of a PII Form in an intergovernmental request is required, as opposed to when it is optional. On some forms, there is an option to indicate "PII form attached", but that option is not available on other forms. For example, on the Child Support Locate Data Sheet, there is no option in the heading/caption of the document to indicate "PII form attached". However, the language in the Purpose Form to the Child Support Locate Data Sheet, under "Rationale", seems to anticipate a PII Form would be attached, as all PII from Section I was moved to the new PII form. Likewise, there is no option in the heading/caption of the Letter of Transmittal Requesting Registration. For clarity, we would suggest including direction in the Instructions as to which documents require attachment of a PII Form.	Clarification	Attach PII	Thank you for your comment. We have split the PII form into two forms. The first is the Child Support Agency Confidential Information Form for IV-D agency use only and the second is the Personal Information Form for UIFSA 311. We have clarified on each form when each form should be used. Also see response to comment #54 for more details.
56	Foreign County	Personally Identifiable Information PIF	We note the following concerns with respect to the PII Form: The Uniform Support Petition, General Testimony and Declaration in Support of Establishing Parentage forms all include a check-box at the top of each of the forms that indicates: [] PII Form Attached If this box is checked off indicating that the PII Form is attached to the forms that are to be filed with the court and served on the Respondent, the PII Form must remain attached to these forms.	Comment - Concern	Attach PII	Thank you for your comment. We have split the PII form into two forms. The first is the Child Support Agency Confidential Information Form for IV-D agency use only and the second is the Personal Information Form for UIFSA 311. We have clarified on each form when each form should be used. Also see response to comment #54 for more details.
57	State	Personally Identifiable Information PIF	The PII (personally identifiable information) form is a great update to the UIFSA forms. The form solves many confidentiality issues. However, I have been informed by at least one state that the SSN and DOB are required by statute to be on both the Transmittal one and the Registration Statement. Will OCSE require use of the PII form and removal of that information from those other forms even for states that have that statutory requirement?	Question	Attach PII	Thank you for your question. We have split the PII form into two forms. The first is the Child Support Agency Confidential Information Form for IV-D agency use only and the second is the Personal Information Form for UIFSA 311. We have clarified on each form when each form should be used. Also see response to comment #54 for more details.
58	State	Personally Identifiable Information CIF PIF	Is the PII form required on the initial request only, or are states expected to submit the PII with all intergovernmental correspondence (e.g. can State B require State A to submit an updated PII when submitting a Transmittal #2 subsequent request for a status update?).	Question	Attach PII	Thank you for your question. We have split the PII form into two forms. The first is the Child Support Agency Confidential Information Form for IV-D agency use only and the second is the Personal Information Form for UIFSA 311. We have clarified on each form when each form should be used. Also see response to comment #54 for more details.
59	State	Personally Identifiable Information PIF	Unless there is a non-disclosure, does the NCP receive a copy of the PII form? If the NCP does not receive a copy of the PII form, can the DOB of the child be left on the Uniform Support Petition, the General Testimony, and the Declaration in Support of Establishing Parentage?	Addition	DOB	Thank you for your question. We have split the PII form into two forms. The first is the Child Support Agency Confidential Information Form for IV-D agency use only and the second is the Personal Information Form for UIFSA 311. We have clarified on each form when each form should be used. Unless there is a non-disclosure the NCP should receive whichever form is used. Also see response to comment #54 for more details.

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60	State	Personally Identifiable Information	This form will resolve situations that involve the family violence indicator (FVI).	Statement	Family Violence	Thank you for your comment. We are glad that the form will be useful to protect information in family violence cases. This is a Training Issue.
61	Organization	Personally Identifiable Information CIF PIF	The nondisclosure check box - add the word "attached" to prompt attachment as directed in instructions. Responding agencies will need this information to protect persons involved; this will save time.	Addition	Nondisclosure	We agree with this comment. The new Personal Information Form for UIFSA 311 includes the word "attached" after the nondisclosure check box. This word was added on all the forms where the checkbox appears.
62	State	Personally Identifiable Information CIF PIF	Nondisclosure Findings/Family Violence - The instructions state to use the IV-D agency address in lieu of parent address. Would the IV-D agency omit the other identifiable information when a nondisclosure finding is provided?	Question	Nondisclosure	Thank you for your question. This would be up to the state completing the form. Also see response to comment #54.
63	State	Personally Identifiable Information PIF	We suggest adding clarification to this form and the instructions that this form should not be released to the parties.	Clarification	Privacy	We disagree with this comment. See response to comment #54.
64	State	Personally Identifiable Information PIF	The form is filed and sealed and will not be public record. Will the other party be given this form when they are served? If yes, there is a privacy concern, as it is unnecessary to give the other party all of this personal information.	Privacy	Privacy	We disagree with this comment. See response to comment #54
65	State	Personally Identifiable Information PIF	The instructions state that if there is a Non-disclosure Affidavit/Finding, the PII should be sealed. How is this different from "THIS FORM CONTAINS SENSITIVE INFORMATION – DO NOT FILE THIS FORM IN A PUBLIC ACCESS FILE"? Don't they offer the same protection anyway?	Clarification	Public Access File	We disagree with this comment. The notice on the current PII form is a request that the form with sensitive, personally identifiable information not be accessible to the general public. A nondisclosure affidavit is a mechanism whereby a party requests, consistent with the requirements of UIFSA § 312, that certain information not be disclosed to the other party because the "health, safety, or liberty of a party or child would be jeopardized by disclosure of specific identifying information..." UIFSA § 312 requires the responding tribunal to seal the information, which also may not be provided to the opposing party unless and until the tribunal holds a hearing and requires disclosure. Also see response to comment #54. Training Issue
66	State	Personally Identifiable Information PIF	The form itself is fine, but my staff requested clarification regarding if we will always file these for incoming RFSO's and also advise us regarding the instructions that say to seal the document. I believe that pursuant to IC 31-18.5-6-1 (adoption of UIFSA 2008) we would have to file the PII in every case. We would likely file the entire document on "green" paper to maintain confidentiality or request the document be confidential. One worry to consider is that this document while helpful in that all confidential is in one place so it can be fully filed confidential rather than having to redact only portions is that also cuts both ways in that the security of these documents is of utmost importance.	Clarification	Public Access File	Thank you for your observation. See response to comment #54

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67	Foreign County	Personally Identifiable Information PIF	The PII Form itself contains the following notice at the top: "THIS FORM CONTAINS SENSITIVE INFORMATION – DO NOT FILE THIS FORM IN A PUBLIC ACCESS FILE."	Comment - Concern	Public Access File	Thank you for your observation. See response to comment #54
68	Organization	Personally Identifiable Information CIF PIF	We supports creation of a separate form to maintain protection of the demographic and identifiable information of the parties involved in the case. Therefore , it's possible to share that identifying information with the IV-D agency, but it is not filed with the court and is not otherwise available to the parties. However, the addition of a separate section dedicated to information about the caretaker later in the form seems out of place. None of the other uniform forms reflect this separation of information about the caretaker who, in an interstate situation , will also be the obligee and most likely the petitioner on the action. If this proposed section is really a placeholder for situations where a non-parent custodial relative or the child is in custody of a IV-E agency, then perhaps the heading could be stated more clearly so that the form is used consistently by staff across the federal program.	Comment - Concern	Public Access File	We agree with your comment on the caretaker information. We combined the caretaker information into Section 2 on both the Child Support Agency Confidential Information Form and the Personal Information Form for UIFSA 311 Form. Also see response to comment #54.
69	State	Personally Identifiable Information PIF	State requests that OCSE clarify OCSE's expectations regarding when, how, and to what extent the key intergovernmental forms will be protected. What exactly does the language, "DO NOT FILE THIS FORM IN A PUBLIC ACCESS FILE" mean? Likewise, what is meant by the language that "the PII form will be filed with any pleading or testimony filed or submitted by a party and will be sealed in accord with state procedures?"	Question	Public Access File	Thank you for your observation. See response to comment #54.
70	State	Personally Identifiable Information PIF	The true sealing of a document or file, similar to what is done in juvenile cases in State, would make working an intergovernmental case more challenging than ever. It would also increase the timeframes required to unseal records each time action is taken. Is OCSE's intent more in line with protecting the PII form from overall public access? Also, although the intergovernmental forms state that the PII form is to be attached, this may be inappropriate if there is a non-disclosure finding/affidavit since the petition and the attachments are generally served on each individual party.	Question	Public Access File	Thank you for your observation. See response to comment #54. OCSE's intent is to protect personal information from public access. Where a nondisclosure affidavit is included, the responding tribunal must follow the requirements of UIFSA § 312.
71	State	Personally Identifiable Information CIF PIF	Provide clarification on when the PII form is required to be used. It is not clear whether the PII form should be used in all IV-D cases or only cases where there is a non-disclosure affidavit or finding.	Clarification		Thank you for your observation. See response to comment #54.
72	Foreign County	Personally Identifiable Information PIF	A new form titled "Personal Identifiable Information (PII) Form" has been created. We understand that the purpose of this form is to remove personal information from the other forms to facilitate its protection. We think this is a very useful change, but the PII form is now the only form that sets out the child's date of birth (which is a mandatory piece of information for an ISO application pursuant to the ISO legislation) so unless the child's birth certificate is attached to the application, the requirement for child's date of birth may not be included in a document that can be filed with the court and accepted as evidence.	Comment - Concern		Thank you for your observation. See response to comment #54.

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73	State	Personally Identifiable Information CIF PIF	We believe the first full sentence of this form, which states, "The information in this form is legally privileged and confidential", is not entirely accurate. We agree the information in the form is likely confidential, but not necessarily legally privileged. If the information is legally privileged, we would request the form include a citation to the authority that classifies the information as privileged. This statement also appears at the beginning of the other proposed forms.	Comment - Concern	Legally Privileged and Confidential	We agree with this comment. The term "legally privileged" was removed.
74	State	Personally Identifiable Information CIF PIF	This form contains sensitive information -do not file this form in public access file. This statement could be made even more distinguishable, possible a different font, larger, italicized perhaps to ensure it is receives attention.	Change	Public Access File	We agree with this comment. The header on both the Child support Agency Confidential Information Form and the Personal Information Form for UIFSA 311 was modified to make it more distinguishable.
75	State	Personally Identifiable Information CIF PIF	Instructions should clarify exactly what information may be redacted or substituted, such as for the agency address, if a Nondisclosure Finding/Affidavit is attached, and what information must still be provided.	Addition	Nondisclosure	Thank you for your observation. See response to comment #54.
76	State	Personally Identifiable Information CIF PIF	Header Warning - Please include reference UIFSA Section 312.	Addition		We agree with this comment. We have made changes to the instructions to reference UIFSA Section 312.

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Letter of Transmittal Requesting Registration

#	Submitted By	Form	Comment	Category	Common	Comments/Notes
1	State	Letter of Transmittal Requesting Registration	Page 1. Section I. Case Summary: Type of Arrears: If there is a breakdown for the types of arrears, we would suggest that there be a separate breakdown for the interest associated with each arrears type.	Addition	Arrears	We disagree with this comment. This is not needed on the Registration Statement.
2	State	Letter of Transmittal Requesting Registration	In Section I. Case Summary include a request for a principal & interest breakdown of each debt type. Maybe include the interest percentage being charged.	Addition	Arrears	We disagree with this comment. This is not needed on the Registration Statement.
3	State	Letter of Transmittal Requesting Registration	In many instances the Initiating IV-D agency has an order that sets forth an amount to be paid toward the arrearages. In addition to the amount owed for each arrearage type (child support, medical support, and spousal support) there should also be columns to reflect any payment amount and frequency already established by a court or administrative order.	Addition	Arrears	We disagree with this comment. Even if the order sets an arrearage payback amount, the responding state will apply its own procedures and remedies to enforce current support and collect arrears.
4	State	Letter of Transmittal Requesting Registration	Case Summary: Assigned arrears only: \$ _____ If assigned arrears only collection is requested, how is that amount to be reflected on the Arrears Affidavit?	Addition	Arrears	We are not sure what the comment is saying because it would depend on the situation.
5	Organization	Letter of Transmittal Requesting Registration	I. case summary - add line for "arrearage orders if any" under obligation.	Addition	Arrears	We disagree with this comment. To show this you would leave current support blank and enter the arrears.
6	State	Letter of Transmittal Requesting Registration	Propose addition at paragraph V., just below "Sworn statement of arrears..." of "[] Order determining arrears"; will make clear that either an order determining arrears or a payment history may be provided	Addition	Arrears	We agree with this comment. We have added a check box "[] Order determining arrears" below "Sworn statement of arrears..." in Section V.
7	State	Letter of Transmittal Requesting Registration	Update instructions for the addition at paragraph V., just below "Sworn statement of arrears..." of "[] Order determining arrears"; to make it clear that either an order determining arrears or a payment history may be provided.	Addition	Arrears	We agree with this comment. We will update the instruction to add "Check the "Order determining arrears" box if you are providing a tribunal order determining arrears.".
8	Organization	Letter of Transmittal Requesting Registration	This form does not allow the initiating state to clearly indicate whether or not the interest that has accrued on the arrearage has been reduced to a judgment. Several jurisdictions will not seek an Order confirming the arrearage that is the interest, unless there is a judgment for it. The judgment for the interest must be included with the referral, and it must be signed by a judge and state the amount of the interest judgment as of a date certain. This form merely states "Total Interest." We would recommend that the form allow for the initiating state to note the nature of the interest and remind the user that s/he should consult the IRG for guidance regarding including interest in the arrearage.	Addition	Arrears	We disagree with this comment. This is not common and there is a place for total interest on the form. The responding state should not be allowed to request a judgment. Training Issue
9	State	Letter of Transmittal Requesting Registration	If the "Action:" options remain on the form, we request definition of "Arrears Only" since states may define this differently.	Addition - I	Arrears	We disagree with this comment. Arrears is defined in 45 CFR 301.1 under "overdue support".

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10	State	Letter of Transmittal Requesting Registration	Assigned arrears only data field should be removed from this form. State CSE does not see the relevance in a state knowing whether the arrearage we are being asked to enforce collection of is assigned or unassigned. If you are going to keep this on the form please designate whether this is intended to be a place to indicate conditionally assigned, permanently assigned arrearages or both.	Addition Change	Arrears	We disagree with this comment. The registering state does not need to know whether arrears are conditionally or permanently assigned. That characterization affects distribution, which is done by the initiating state. However, the workgroup concluded that it was important for the registering state to know in general whether arrears were assigned arrears. It may impact how the responding tribunal characterizes its arrearage determination. In other words, if the responding tribunal is only determining assigned arrears, its order needs to make clear that its arrearage determination does not include nonassigned arrears that may be owed to the CP.
11	State	Letter of Transmittal Requesting Registration	Is there a form regarding an arrears statement? Page 6a of the current General Testimony is no longer included. Some states only send payment histories and have a total amount due; as a result, it is unclear how the state arrived at that balance. Consistency of the Arrears Statement should be required; have a Form and attach Record of Payments that has the layout of page 6a of the current General Testimony. It does not need to be the same lay out as long as the Arrears Statement shows a running total (like our Excel ROP does). As a responding state, it is imperative to be able to explain how the balance arrived.	Addition Clarification	Arrears	We disagree with this comment. Most states already have this in place.
12	State	Letter of Transmittal Requesting Registration	Can it be included that the Arrears Affidavit is in month/year amount due, amount paid, interest, balance due format?	Change	Arrears	We disagree with this comment. Most states have already set a format within their system. OCSE does not intend to mandate a particular format through this form. UIFSA does not require a month by month statement.
13	State	Letter of Transmittal Requesting Registration	Section I also lists the amount of assigned arrears. This information may also be confidential under the law of the tribunal and does not appear necessary to register the order.	Change	Arrears	We disagree with this comment. The state may redact the information if it is confidential under state law.
14	State	Letter of Transmittal Requesting Registration	State proposes that the Register for Enforcement of Arrears Only box next to the Action section be reworded to state "Register for Enforcement of Arrears Only, if no current support owed," based on the rationale provided above for the Transmittal #1- Initial Request.	Change	Arrears	We disagree with this comment. The current support does not need to be terminated in order to request registration for arrears only.
15	State	Letter of Transmittal Requesting Registration	State asks OCSE to clarify why a party is required to attach a sworn statement of arrears to the sworn Letter of Transmittal Requesting Registration. This process appears duplicative and could be streamlined by possibly adding a statement under Section VI. Declaration: "All information and facts stated in this Letter of Transmittal Requesting Registration including the attached statement of arrears are true to the best of my knowledge and belief."	Change	Arrears	We disagree with the suggestion that the requirement is duplicative. Section 602 of UIFSA requires a sworn statement by the person requesting registration or a certified statement by the custodian of the records showing the amount of any arrearage. The suggested language does not comply with the UIFSA requirement.

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16	State	Letter of Transmittal Requesting Registration	Header Case Identifying Info, Action - We like the options provided for registration of arrears only cases. However, in situations where the state is not in a position to collect current support, it would be beneficial to include a timeframe for when the arrearages accrued. There are several scenarios where a state may need to collect arrears only for a specific time period and therefore not all arrears under the order would be included on the registration statement. During an Intergovernmental conference call, it was stated that the workgroup's intent was to utilize the "arrears only" option only when current support was no longer due under the order. Current support may be due but just not enforced by the IV-D agency. An example would be custodial party closes her portion of case, the IV-D agency still needs collection of assigned arrears under the order. The use of this form needs to be for ALL arrears only situations. We question whether there should be a check box for "PII Form Attached" included in this section.	Comment - Concern	Arrears	We disagree with these comment. The form has a timeframe for when the arrears accrued and this is appropriate. You can also collect arrears even if there is current support. We added more personal information to this form and made this a non-public access form.
17	State	Letter of Transmittal Requesting Registration	Section I has been changed to indicate the amount of each type of arrears. Some tribunals do not specifically keep track of each type of arrears in their computer databases. In that case, is it possible for the tribunal to leave those sections blank and just list the total amount of arrears?	Question	Arrears	We disagree with this comment. A state should fill in as much of the form as it can. Training Issue
18	State	Letter of Transmittal Requesting Registration	Period of TANF data field should be removed from this form. An individual may receive TANF for a child sporadically over the child's life and it would be very difficult to list all of those months/years on this form.	Change	TANF	We agree with this comment. The following statement was added after the Assigned arrears only: "(Attach documentation of TANF time periods)".
19	State	Letter of Transmittal Requesting Registration	We suggest removing "Period of TANF" from the Letter of Transmittal Requesting Registration. This information is not needed for registration, is confidential, and should not be in the court file.	Change	TANF	We agree with this comment. See response in Comment #18.
20	State	Letter of Transmittal Requesting Registration	Section I. Case Summary - We like the breaking apart of the support obligation in this section into current support and arrears and then even further into child support, medical support, spousal and interest. This provides a very clear picture of the arrears for the prosecuting attorney for registration. We do have a concern with the "Period of TANF" date field. How are multiple occurrences of TANF time periods addressed on this form? It is very common for obligees to go on and off TANF during the history of a case. This form field does not allow for the user to include multiple time periods of TANF. We feel it needs adjusted to do so as it is important to distinguish the different assignment time periods.	Comment - Concern	TANF	We agree with this comment. See response in Comment #18.
21	State	Letter of Transmittal Requesting Registration	Section II. Obligee Information - Our concern in this section is that same as mentioned previously. We would like the caretaker portion to specifically identify whether the caretaker has legal custody or guardianship rather than combined in the current question.	Comment - Concern	Caretakers	We disagree with this comment. This is not relevant to the registration.
22	State	Letter of Transmittal Requesting Registration	Please clarify why the name of the form was changed. We understand the reference to UIFSA 2008 language' however, the term Registration Statement is a universally understood form and pleading for courts.	Comment - Concern	Case History	We disagree with this comment. The title was changed to clarify that this is a transmittal and to make this a letter to avoid double work. "Letter of Transmittal" comes directly from UIFSA. Training Issue

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23	State	Letter of Transmittal Requesting Registration	Why change the name of this form? If you have to change it, why not Registration Request?	Change	Name	We disagree with this comment. See response in Comment #22.
24	State	Letter of Transmittal Requesting Registration	Also, under section V. Often the certified order is requested from the court at the time the Intergovernmental paperwork is sent to the other state. Upon receipt, and the certified order follows. Because the form now states it is required for two copies of the order, one being certified to be sent, are states unable to start the process until the certified order is obtained?	Question	Certified Order	We disagree with this comment. Federal regulations require the states to work the case pending additional information even if it can't be filed.
25	State	Letter of Transmittal Requesting Registration	Would there never be an instance when a state may ask for registration of the order for modification only and not enforcement? If so there needs to be a box for Register for Modification Only.	Addition	Modification Only	We agree with this comment. We added as an Action: "Register for Modification".
26	State	Letter of Transmittal Requesting Registration	At the top of the form under the 'Action,' there is no option to Register for Modification Only. If a state is enforcing an order by long-arm, a modification is needed, and the responding state has CEJ, the initiating jurisdiction may only need the responding state to modify the order. Recommendation: Add option to Register for Modification Only	Addition	Modification Only	We agree with this comment. See response in Comment #25.
27	Organization	Letter of Transmittal Requesting Registration	The option to Register for Modification only has been removed. Please add this option back to the forms . For example, a case where State A has the original order, CP resides in State B, and NCP resides in State C: NCP (C) may request a modification of the child support order in State B, but NCP's state (C) does not want State B to enforce it. Modification is the only action necessary.	Addition	Modification Only	We agree with this comment. See response in Comment #25.
28	State	Letter of Transmittal Requesting Registration	Form page 1, Action: The checkbox to Register for Modification was amended by adding "and Enforcement." Should include an action for Register for Modification Only.	Change	Modification Only	We agree with this comment. See response in Comment #25.
29	State	Letter of Transmittal Requesting Registration	Page 1. Action: We suggest an option for registration for modification only.	Change	Modification Only	We agree with this comment. See response in Comment #25.
30	State	Letter of Transmittal Requesting Registration	The "Action:" portion lists different types of registrations which we find confusing. The second option seems to indicate an order can be registered only for a portion of the arrears. We feel that an order should generally be registered in its entirety. Also, this section contains no option to register an order for modification only. Sometimes based on the parties' residences, the order must be sent to another jurisdiction for registration and modification, but the initiating tribunal wishes to retain enforcement of the case. These problems with the type of registration point to a larger issue- namely, whether the form needs to specify at all what type of registration is sought.	Change Comment - Concern	Modification Only	We agree with this comment. See response in Comment #25.
31	State	Letter of Transmittal Requesting Registration	State notes that the changes to this form, similar to the Transmittal #1, remove the option for states to request registration for modification only. By adding "and enforcement" to the respective section, the form loses some of its applicability. State understands the scope of registration under UIFSA 2008 to already provide for both enforcement and/or modification; however, need some practical process in a fact pleading state to inform the responding state IV-D agency, judicial authority, and resident parent of what action is being pursued. Please see the prior example regarding registering a case for modification only from Transmittal #1..	Comment - Concern	Modification Only	We agree with this comment. See response in Comment #25.
32	State	Letter of Transmittal Requesting Registration	On the LTRR (Letter of Transmittal Requesting Registration), the option for Registration for Modification Only has been removed. What is the reason for removal of this option?	Question	Modification Only	We agree with this comment. See response in Comment #25.

0970-0085 - Attachment 2
Letter of Transmittal Requesting Registration

33	State	Letter of Transmittal Requesting Registration	In the top section under Action, a check box was change to state "Register for Modification and Enforcement". The form instructions state Modification and/or Enforcement. Is this a typo on the form?	Question	Modification	We agree with this comment. See response in Comment #25. We also changed the "and/or" to be "and" so that it reads "Register for Modification and Enforcement".
34	State	Letter of Transmittal Requesting Registration	In the "note" section "Nondisclosure Finding/ Affidavit Attached"— is it required to be "attached" on this form only (the word "attached" is not on the other forms)?	Clarification	Nondisclosure	We agree with this comment. We have updated the other forms to be consistent.
35	State	Letter of Transmittal Requesting Registration	State does not always have a "Nondisclosure Finding/ Affidavit" document that we can attach. This seems like a new requirement—was that intended?	Comment - Concern	Nondisclosure	We disagree with this comment. This is not a new requirement as it is a checkbox on the current form.
36	State	Letter of Transmittal Requesting Registration	We would like the information regarding the original order and the non-modifiable elements included, i.e. age of emancipation.	Addition	Order	We disagree with this comment. This is not required by UIFSA or appropriate for this form.
37	State	Letter of Transmittal Requesting Registration	Page 1 of 1, VI. Declaration: Signature of Petitioners Attorney/Bar number – would like something on this page stating when this signature is needed.	Addition	Signatures	We disagree with this comment. The instructions are clear. They read "The Letter of Transmittal Requesting Registration must be signed. Check the appropriate box to indicate who has signed this form. In a IV-D case, the person requesting registration or a IV-D representative may sign the Letter of Transmittal. If the person requesting registration is represented by a private attorney, then the person's attorney may sign and date the form. The attorney should provide the applicable bar number."
38	State	Letter of Transmittal Requesting Registration	Instructions - Section VI. Declaration, we have a question regarding the second to last sentence (page 3). If an individual is represented by a private attorney does the attorney have to sign and date the form? If so, this should read "shall" instead of "may".	Change - I Question	Signatures	We disagree with this comment. See response in Comment #37.
39	State	Letter of Transmittal Requesting Registration	Clarify who the signor is in the signature field of the Letter of Transmittal Requesting Registration.State generally supports the changes made to the Letter of Transmittal Requesting Registration (formerly, the Registration Statement). However, we propose that the signature field of the Letter be changed from "Signature of petitioner's attorney/bar number" to "Signature of agency official or petitioner's attorney/bar number," to clarify that other individuals, such as IV-D agency employees, may complete the form. In several states, including my state, the individual completing the letter represents the IV-D agency only, and not the petitioner.	Change	Signatures	We disagree with this comment. The checkbox underneath the signature line indicates if this is for a "Party seeking registration" or the "IV-D Representative. This is where the IV-D agency employee would sign.
40	State	Letter of Transmittal Requesting Registration	Under Section VI of the Letter, we ask that consideration be given to labeling the second signature line "Signature of petitioner's private attorney/bar number (if applicable)".	Change	Signatures	We agree with this comment. We have added the term "private" to the signature line and will make this consistent across the forms.
41	Organization	Letter of Transmittal Requesting Registration	IV. Other pertinent information - <u>This order has been registered in the following states: state [from date] [closed date]</u>	Addition		We disagree with this comment. This is not always known and is contrary to what UIFSA requires.

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Letter of Transmittal Requesting Registration

42	Organization	Letter of Transmittal Requesting Registration	The following note should be moved to the top of the form. Note: All IV-D cases should also attach a Transmittal #1 and a PII Form .	Change		We agree with this comment. We have moved this to the top of the form "For IV-D cases, a Transmittal #1 and Child Support Agency Confidential Information Form must be attached."
43	State	Letter of Transmittal Requesting Registration	Suggest moving the Attach description and location of property not exempt from execution and the Identify any source of income of the obligor in addition to employment to the Personal Identifiable Information (PII) form.	Change		We disagree with this comment. We have replaced the PII form based on the comments received. There are now two new forms: the Child Support Agency Confidential Information form and the Personal Information for UIFSA 311 form. However, we have retained personal identifying information to this form, as required by UIFSA, in order to make it a stand alone form.
44	State	Letter of Transmittal Requesting Registration	Section V. Attachments - We feel the wording of the Note in this section needs adjusted as the current statement is unclear. "If requesting registration for modification, also attach a Uniform Support Petition, and General Testimony. All IV-D cases should also attach a Transmittal #1 and a PII Form." We suggest changing the Note statement to: For a IV-D cases attach a Transmittal #1 and PII Form. If requesting registration for modification, also attach a Uniform Support Petition and General Testimony.	Change		We disagree with this comment. We moved the request to attach a Transmittal #1 and PII Form to the top of the form therefore we do not need to change the order of the sentences. See response in comment #42.
45	State	Letter of Transmittal Requesting Registration	#1 - In the Instructions, page 1, last italicized text box, it appears the end of the last sentence is missing, as the sentence cuts off after "it may be". #2 - Also, on page 2, Section I, second paragraph following the italicized text box, the label "Type of Obligation" is not used anywhere on the form. Is this label supposed to correspond with the label "Current Obligation"? For clarity purposes, we believe the labels used in the instructions should be verbatim with the labels used in the form.	Change - I		We agree with this comment. For comment #1 we have expanded the box so that all the information can be seen. For comment #2 we have changed the label to read "Current Obligation".
46	Organization	Letter of Transmittal Requesting Registration	V. . Attachments - Two copies of the order [including all prior orders in the cases] with one being certified. Many times agencies forward incomplete information about case history which leads to delays.	Comment - Concern		We agree with this comment. We have adjusted the language to mirror UIFSA "Two copies, including one certified copy, of the order to be registered, including any modification of the order."
47	State	Letter of Transmittal Requesting Registration	For State the term "transmittal" is general understood to mean communication between states, and this may require some changes for court forms or filing procedures.	Comment - Concern		We disagree with this comment. This is a training issue.
48	Workgroup	Letter of Transmittal Requesting Registration	Section 602 of UIFSA requires that the registering party send the name, address, and SSN of the obligor plus the name and address of the obligor's employer. The Personal Information Form for Section 311 does not include the name and address of the obligor's employer. So that won't suffice. That information is in the Child Support Agency Confidential Information Form, but that form is NOT supposed to be filed with a tribunal or the other party.			Because of UIFSA's requirements, the forms workgroup recommended that the Letter of Transmittal Requesting Registration add a line related to employment of the obligor. The workgroup decided to add all of the required PII information on the form so that it could be a stand alone form. Training Issue

0970-0085 - Attachment 2
Transmittal #1

#	Submitted By	Form	Comment	Category	Common	Comments/Notes
1	ME	Transmittal #1	<p>Section II – the Case Summary of the proposed form is changed to allow for only one order. Maine has many cases in which there is more than one current and valid order. As Maine has both administrative and judicial child support establishment and enforcement tribunals, this can happen, for example, in the following or similar situations:</p> <p>1. A TANF client receives an administrative order for support. Later the parents go to Court to address parental rights and responsibilities or to divorce. The Court order will address child support, superseding the administrative order for current support. However, the established and accrued arrears under the administrative order remain to be enforced.</p> <p>2. The parties obtain a court order from family court which addresses current and ongoing child support, but fails to address a valid past period of support. The administrative process is used to establish a debt for the past period. Either of these common scenarios, and others, may result in multiple orders for the cases involved – one for current support, one for arrears. Although the proposed form has a checkbox for “Additional orders attached,” Maine’s experience has been that states are reluctant (or refuse) to register and collect arrears owed on an order that is not listed on the CSE1. We welcome the opportunity to brainstorm possible solutions to our concerns.</p>	Comment - Concern	TANF Arrears	We agree with this comment. We will add space for an arrears-only order, as well as for a current support order.
2	State	Transmittal #1	<p>Section II Case Summary -</p> <p>#1 - We cite a CRITICAL need for this section. Additional space is necessary to provide information for multiple orders rather than the current space allocated for information on one order.</p> <p>#2 - We prefer space to provide detailed information for at least 3 orders. There are several examples of why multiple orders may exist on one case. A judicial order is entered for the parties first child. The parties later have an additional child and a second judicial order is entered for current support. The IV-D agency entered an administrative order that was later superseded by a judicial order. These orders would have different order numbers and arrearages could be owed under both orders. We would send an Intergovernmental referral requesting collection of arrears on the administrative order and current and arrears on the judicial.</p> <p>The mere optional selection of "Additional orders attached" does not suffice. There is too much possibility of error and confusion if ample space to clearly define the true and distinct order information is not available.</p> <p>#3 - We feel the "tribunal case number" field in this section should be changed to "tribunal support order number". This would allow for consistent terminology based on the wording on the Letter of Transmittal Requesting Registration. We feel including the word "order" is important to ensure states easily understand it is not appropriate to enter the IV-D case number in this field.</p> <p>#4 - We suggest the "total amount of arrears" field be expanded to include first the total amount of arrears but then also that amount split into assigned and non-assigned. This information clearly indicated on the first page of the Transmittal #1 would be helpful to identify immediately to whom the arrears are owed, the obligee and/or the state. Separation of principal and interest arrears amounts would also be beneficial.</p>	Addition	Additional Orders	Thank you for your comment. See response to comment #1 and response #2 to comment #2.

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Transmittal #1

3	State	Transmittal #1	<p>State requests OCSE provide further clarification on the purpose for removing the fields for multiple orders from the Transmittal #1. My State is a UIFSA 2008 state and was a UIFSA 2001 state, and my state generally understands the process for determining the controlling order almost 20 years after UIFSA 1996; however, the state believes there is still a strong practical use for the multiple order fields. The current Transmittal #1 requires states to complete the Case Summary section and indicate all existing orders – including when multiple states have orders at the same time. Despite UIFSA’s requirement against subsequent orders, my state still regularly encounters cases where multiple orders were entered – albeit in error.</p> <p>The Transmittal #1 allowed the state/ the filer to then choose or specify either “Tribunal Determined Controlling Order” or “Presumed Controlling Order” for the various orders listed. This clear notification allowed states to notify the noncustodial parent of all orders against him or her and which was being registered and pursued as the controlling order. Providing this information coincides with the UIFSA 2001 (and 2008) provision allowing a noncustodial parent the opportunity to contest the registration under the claim that the wrong order was being presumed as controlling.</p> <p>As revised, the same section now only permits entry of one order, without space to identify on the form if additional orders are involved and which may be either determined or presumed as controlling. At a minimum, clarification as to the rationale for this change would be helpful. If initiating states are no longer required or expected to notify the responding state of all orders in effect at the time of the action request, guidance should be offered to states regarding how to notify noncustodial parents that multiple orders do exist.</p>	Comment - Concern	Additional Orders	<p>We disagree with this comment. A detailed breakdown is not needed if it is the responding jurisdiction’s own order; the responding state has the payment record. Breakdown for registered orders is on the Letter of Transmittal Requesting Registration.</p>
4	State	Transmittal #1	<p>Section II Case Summary: Like to suggest showing the total amount of arrears separated by principle and interest, similar to how the Letter of Transmittal Requesting Registration does. This is helpful for those cases where we are not asking for registration.</p>	Addition	Arrears	<p>We disagree with this comment. The workgroup discussed use of "controlling order" and agreed to eliminate the reference. Training is required.</p>

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Transmittal #1

5	State	Transmittal #1	We generally support the removal of the case summaries for additional orders in Section II of the form, as we understand that cases with multiple valid support orders which require controlling order determinations are rare. However, in modification cases, we are concerned that removing the case summary fields, without further direction in the Instructions, may lead jurisdictions to believe they are not required to attach the original order and any subsequent amendments to that order in situations where the controlling order is a modification to a prior order. Attachment of the original order and subsequent amendments may be necessary in certain cases. For example, if the original order is a divorce decree, and the subsequent amendments simply include language which modifies certain paragraphs of the decree, but does not include the full text of the decree, there may be order information in other paragraphs of the decree that is relevant to the modification, but is not reflected in the subsequent amendments or controlling order. To address this issue, we ask that consideration be given to changing "Date of support order" to "Date of controlling support order" in Section II to clarify that the order being summarized in this section is the controlling order and that direction be included in the Instructions to Section II which clarifies that if the controlling order is a modification to a prior order, the original order and all amendments must be attached if necessary to proceed with modification.	Addition Change	Original Order	We agree with this comment. See response to comment #1.
6	State	Transmittal #1	Section II: There should be space available for more than one order.	Addition	Multiple Orders	We agree with this comment. See response to comment #1. Training issue.
7	Organization	Transmittal #1	In section under II. Case Summary - Change checkbox for "additional orders" to "All orders attached". Agencies often share only the most recent orders or piecemeal case documentation. Building the a case sufficient for registration is time consuming if only summary information is sent.	Change	Multiple Orders	We agree with this comment. We have used the correct title of Letter of Transmittal Requesting Registration
8	State	Transmittal #1	Instructions - The Case Summary section of the instructions say "Note: For a breakdown of "Total amount of arrears" refer to the order and, if applicable, the Registration Statement." We suggest changing "Registration Statement" to "Letter of Transmittal Requesting Registration."	Consistency - I	Arrears	We disagree with this comment. The initiating state does not need to set an arrears payment amount for the responding state to collect on the arrears. This is a training issue.

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Transmittal #1

9	State	Transmittal #1	Under Action 2 Establish Order for: can we include a box that says arrearage payment? If there is not an order that addresses how much the obligor is to pay toward the arrearage, some State counties want to refuse the case and require the initiating agency to establish an arrearage repayment amount before they will enforce collection of the arrearage. When these issues are brought to our attention we advise the local offices that they cannot refuse the case and they must establish the arrearage payment amount but it may help to have a box that indicates establishing an arrearage payment amount is necessary.	Addition	Arrears	We disagree with this comment. The IV-D agency is authorized to enforce arrears-only cases even when current support is not being collected by the initiating jurisdiction. In an intergovernmental case, the responding state is required to enforce arrears and send sums collected to the initiating jurisdiction. (45 CFR 303.7(d)(v)). The initiating jurisdiction must distribute and disburse any support collected in accordance with federal law. (45 CFR 303.7(c)(10). OCSE is aware that further work is needed where multiple states are asking the responding jurisdiction to collect arrears. Additionally, 45 CFR 303.7(c)(13) requires an initiating state to try to find the CP and distribute funds received from the responding state. [The final requirement on initiating IV-D agencies, § 303.7(c)(13), addresses concerns about undistributed collections in a responding State because the initiating State closed its case and refuses to accept any collections in that case from the responding State. Section 303.7(c)(13) requires the initiating State to: "If the initiating agency has closed its case pursuant to § 303.11 and has not notified the responding agency to close its corresponding case, make a diligent effort to locate the obligee, including use of the Federal Parent Locator Service and the State Parent Locator Service, and accept, distribute and disburse any payment received from a responding agency."]
10	Organization	Transmittal #1	Instructions/4C - Add language to "enforce arrears only" to request clarification of status of terminated order if not evident in order verbiage. .	Addition	Arrears	We disagree with this comment. See response to comment #10.
11	Organization	Transmittal #1	I. Action (4) (C) Register and enforce arrears only - Recommend adding "(attach order or policy to document termination of current support obligation)". Some agencies attempt to enforce "arrears only" even when current support still exists on a case due to an uncooperative CP or other misunderstanding. Responding jurisdictions need proof or more explanation that the order has ended if pursuing the arrears only is a legitimate action.	Addition	Arrears	We disagree with this comment. See response to comment #10.
12	State	Transmittal #1	Proposed item 3c of the Transmittal #1 should be reworded to state, "Enforce arrears only, if no current support is owed." Adding the additional language, "if no current support is owed" will clarify when a state may enforce arrears only. Otherwise, the current language appears to be in direct contradiction to the federal distribution rules provided in 45 CFR §302.51 and 45 CFR §302.52. Notwithstanding, in State, pursuant to State Family Code, a court must confirm the amount of child support arrears and render one cumulative money judgment if a motion for enforcement of child support requests a money judgment for arrears.	Change	Arrears	We disagree with this comment. See response to comment #10.
13	State	Transmittal #1	State also recommends the addition of the following language (written in bold type) to page 3 of the Instructions for Transmittal #1: • Check item 3C "Enforce arrears only, if no current support is owed" to enforce the collection of arrears only. Do not check this if current support is also being collected on this case."	Change	Arrears	We disagree with this comment. Arrears only is defined in regulation.

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Transmittal #1

14	State	Transmittal #1	Two of the options within Section I, Action, include "Enforce arrears only" and "Register and enforce arrears only." We seek clarification of the meaning of "arrears only" since states may define it differently.	Clarification	Arrears	#1 - We agree with this comment. We split these into two checkboxes: [] Payment history [] Arrears Balance and/or Accrued Interest (affidavit of arrears) #2 - We disagree with this comment. UIFSA defines "support order" to include a decree for the benefit of a child or spouse or former spouse. That definition would include a divorce decree. It should not matter to a responding state whether the order relates to divorce. We will keep the reference to a support order as it is.
15	State	Transmittal #1	#1 - Section VII Attachments - We would suggest the selection "Arrears Statement or payment history" be changed at minimum to "Arrears Statement and payment history" as both documents are truly needed to process the case. Some states send a one-page arrears statement which will not suffice and requires the requesting of additional arrears documentation causing case processing delays. Our ultimate preference for this option however would be "Arrears statement/calculation and payment history." This would fulfill all needs, reflecting the case balance, showing the owed/paid history of how those arrears were determined and including the specific payment record as well. #2 - We also prefer Support order(s) be changed to Support order(s) or Divorce Decree. Workers report some states consider these separate types of orders and want this distinction.	Addition	Arrears	We disagree with this comment. The transmittal addresses the initial referral of a case. At the time of initial case referral, there should not be multiple payees for the same child at the same time.
16	State	Transmittal #1	We suggest adding a separate section to this form for caretaker information instead of asking if the obligee is the caretaker in Section III. Obligee Information. Some states have multiple payees on a case. In addition, many states do not require a payee to have legal custody of a child in order to receive benefits.	Addition	Caretakers	We disagree with this comment. The information contained in sections III, IV, & V of T-1 provides the minimal information needed to identify the case. Because we are retaining these sections, the 2nd sentence suggested in the comment is irrelevant.
17	State	Transmittal #1	Since most of the information under III, IV and V are found on PII form, is it necessary to also provide it here? The () has legal custody/guardianship of the child(ren) question is not on the PII form, if OCSE removes III, IV and V from the Transmittal #1, that question may need to be added to the PII form.	Addition Change	Caretakers	We disagree with this comment. The order-issuing state's law applies to question of whether or not a caretaker must have legal custody to receive child support.
18	State	Transmittal #1	Section III Obligee Information - We like the format of this section which now includes both Parent and Caretaker information. We feel it could be taken a step further by specifically asking if the caretaker has legal custody or has legal guardianship. The proposed form includes both in the same sentence, we request separation of the two as the differentiation of whether the caretaker has legal custody or just guardianship impacts the action that the state child support will take.	Addition	Caretakers	We agree with this comment. Section I.3 allows the initiating jurisdiction to request multiple "action(s)" - although the situations where multiple actions are needed should be very rare. We have updated the instructions to include this.
19	State	Transmittal #1	Under Action 3 – assuming you can mark multiple boxes. For example, what if we want the other state to change payee, enforce and modify?	Question	Check Multiple Boxes	We disagree with this comment. This comment can be handled under "other".
20	State	Transmittal #1	State recommends that OCSE consider adding a specific box for states or IV-D program to request the establishment and or enforcement of child care.	Addition	Child Care	We disagree with this comment. This is a rare situation if only talking about caretakers and may be covered by "other attachments".

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Transmittal #1

21	State	Transmittal #1	Form Section VII-Attachments: add "Custody Order" to the list of supporting documentation for use with the non-relative, non-assisted caretaker. (We assume this means non-IV-E.)	Addition	Custody Order	We disagree with this comment. Item 5 currently says, 'Check item 5 "other" for an action that is not listed and describe the action requested.' Also the first sentence under the purpose of the form states "The CSE Transmittal #1-Initial Request form is required for initiating an intergovernmental case to any responding state's central registry." Training issue.
22	State	Transmittal #1	Suggest specifying or providing examples of what "Other" in Section 1, Item 5, is intended to be used for. If not, states may utilize this section for a multitude of requests that should be requested via the Transmittal #2 (Subsequent Actions) or Transmittal #3 (Request for Assistance Discovery).	Change - I	Define Other	We disagree with this comment. Under the "Action" section, the initiating jurisdiction is requesting the responding jurisdiction to provide all appropriate services. The case should not be returned because the initiating jurisdiction does not check a box for a service that the responding jurisdiction determines is appropriate. This is a training issue
23	State	Transmittal #1	Under the "Action" section we find this statement "the responding jurisdiction should open an intergovernmental case with the initiating jurisdiction and provide all appropriate services, including:" We would like clarification of what our responsibility is when/if the initiating state did not request an action, but it is clear that the action is necessary and required; whether or not that is grounds to return the packet? For example, if the action to establish paternity is not "marked," however it is clear that it does need to be established, can we require the other jurisdiction to amend the request, or are we responsible for providing an appropriate service even if it was not requested?	Question	Incomplete Request	We disagree with this comment. Transmittal 3 would be used to request limited services and not a T-1.
24	State	Transmittal #1	Under section I. Can a checkbox be added for limited services only cases? (Or would the Transmittal #3 be the correct document?)	Question	Limited Service	We disagree with this comment. The Child Support Agency Confidential Information Form (formerly the PII Form) specifies whether the child was born to
25	State	Transmittal #1	Would it be possible to request marriage information for the parties on this form (if applicable)? For example, when and where they were married. This information would be extremely helpful in determining if paternity of a child(ren) is an issue. Sometimes it takes us several months to obtain this information from the other state. It would be very helpful to have this information when a case is opened with our state to ensure the correct actions are taken on the case and that paternity is addressed, if needed.	Addition	Marriage Information	We disagree with this comment. The workgroup believes a checkbox might be confusing and would require extra programming. CSEnet and QUICK have methods for conveying worker information if states opt to use them.

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Transmittal #1

26	State	Transmittal #1	It would be nice to have checkboxes by the contact info line showing if state can be contacted on CSENet, QUICK, or EDE	Addition	CSENet	<p>#1 - We disagree with this comment. The placement of "Please return the acknowledgment form" is the same as on the current form. We have, however, bolded it to stand out.</p> <p>#2 - We agree with this comment. See response to comment #40.</p> <p>Regarding the request for a CSENet code for modification, we have passed that on to the systems group for its consideration.</p> <p>#3 - We disagree with this comment. According to OCSE Employer Services several states send requests to other states to withhold support for UI benefits. Some do it as a limited service action while others cannot and have to open a two-state case. States would need to use transmittal #3 for the limited service request. The workgroup noted that many states are not able to offset unemployment benefits using income withholding. If a state requests this action, the workgroup agreed it should be put under "#5. Other".</p> <p style="text-align: right;">#4</p> <p>- We disagree with this comment. The detail is on the Letter of Transmittal Requesting Registration and should not be duplicated here.</p> <p>#5 - We disagree with this comment. See response to comments #46 - 49.</p>
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0970-0085 - Attachment 2
Transmittal #1

27	State	Transmittal #1	<p>#1 - Section I. Action - We like the explanation statement that follows the title of this section as it clearly identifies that an intergovernmental case should be opened and requested services provided. We suggest the (Please return acknowledgment) statement following it be moved to a different location, possibly bottom right corner of that section.</p> <p>We suggest the following additions/changes to the Action options:</p> <p>#2 - Register for Modification Only- this action was removed from the form but we feel it should remain as an option for cases where State A is directly enforcing the order but requires State B to complete a modification. ** On a related note, there also needs to be CSENet codes for modification.</p> <p>#3 - Income Withholding- this action was removed from the form but we feel it should remain as it is used when sending referrals to other states for collection of unemployment benefits only. Both parties may be in Missouri and we only need the other state to take that specific enforcement action. If income withholding is removed as an action, we ask for clarification for the appropriate way to request another state to withhold unemployment benefits only. Would it be preferable to select the "Other" option on the Transmittal #1 or would using the Transmittal #3 be appropriate?</p> <p>#4 - 4. C. Register and enforce arrears only we would like this changed to mirror the Letter of Transmittal Requesting Registration by adding options under this selection for assigned and non assigned arrears.</p> <p>#5 - Redirect Only- was this option removed because OCSE assumed the new 319(b) form covered all redirect scenarios? We do not feel it is necessary to use the 319(b) Change of Payment Location form for all redirect situations. If a case is paying consistently from DFAS or SSA payments in State A, for example, State B may just want to request redirection of payments only from State A to keep payments timely and consistent with as little case disruption as possible. We feel the redirect only option should remain available for states to use at their discretion in situations where the 319(b) is not necessary or appropriate.</p>	Addition Change	CSENet	<p>We disagree with this comment. Information about the obligor/obligee is on the Child Support Agency Confidential Information Form. The suggestion made by the commenter would be helpful to the tribunal, however, this form is only sent to the initiating IV-D agency and used for IV-D purposes.</p>
28	State	Transmittal #1	<p>Need check boxes like there are on the Uniform Support Petition to indicate whether the Petitioner is the obligee or obligor and the same for the Respondent.</p>	Addition	Obligee/Obligor	<p>We disagree with this comment. See response to comment #28.</p>

0970-0085 - Attachment 2
Transmittal #1

29	State	Transmittal #1	The Uniform Support Petition identifies whether the obligee or the obligor is making the request and the notes indicate that the form does this to clarify which party is the requestor; however, this information does not appear on the Transmittal 1. For the sake of consistency and clarity, the information should appear on both forms.	Addition	Obligee/Obligor	We disagree with this comment. Under 45 CFR 303.72(g), Procedures for Contesting Federal Tax offset in Interstate Cases, if the complaint cannot be resolved by the state submitting child support arrears for Federal tax offset, and the noncustodial parent requests an administrative review in the state that originated the support order upon which the arrears are based, the submitting state must notify the state with the order of the request for a review. The submitting state must also provide all necessary information to the order state within 10 days of the request for an administrative review. In this situation, it is overly burdensome and unnecessary to require the submitting state to complete the Transmittal #1 when the request does not involve the opening of a IV-D case. Additionally, 45 CFR 303.7(a)(8) lists an administrative review as an example of a limited service. We believe that the Transmittal #3, which is used to request assistance from another state, meets the needs of both states. The workgroup also noted that the commenter may erroneously believe that the "review for offset" on the former T1 was to request the responding state to review and submit the case for offset, as opposed to a noncustodial parent requesting a review (as permitted under regulations).
30	State	Transmittal #1	We noticed that the "Review for offset" option has been removed from this transmittal and moved to transmittal #3. When sending the initial referral, we often ask for this type of a review along with enforcement.	Addition	Offset	Thank you for your comment. The workgroup concluded a photo was not generally used. The photo can be included under "other attachments" if it is needed.
31	State	Transmittal #1	State questions why the option to include a photograph of the respondent was removed from the list of Supporting Documentation. A photo can be a useful attachment.	Comment - Concern	Photo	Thank you for your comment. Former assistance does not mean a family who previously received Medicaid. Former assistance is for former TANF and IV-E recipients.
32	Organization	Transmittal #1	Instructions/TANF - Doesn't former assistance also mean a family who previously received Medicaid?	Question	TANF	Thank you for the comment. This is a training issue.

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Transmittal #1

33	State	Transmittal #1	Page 1, Section II. Case Summary: Based on submissions received by the State Interstate Central Registry (ICR), it appears that some initialing jurisdictions find the Case Summary section of the form confusing. For example, the Period of computation field is often left blank or contains only one date. This creates confusion within the ICR and can result in the forwarding of conflicting information to the court or local district. This is an example of the value of considering the inclusion of instructions or references within this section of the form.	Comment - Concern		We disagree with this comment. When creating the Transmittal #1 Acknowledgment, the forms workgroup took the position that it is the responding state's enforcement procedures that control, not those of the initiating state. We also note that section 507 of UIFSA, Administrative Enforcement of Orders, provides that the initiating jurisdiction should send the documents required for registering the order. The responding jurisdiction then determines whether administrative procedures are appropriate.
34	State	Transmittal #1	We suggest adding administrative enforcement to the options on the Transmittal# 1. If this is not listed, the initiating state will need to send a registration statement with the initial request and it may not be used by the responding state. The Transmittal# 1 -Acknowledgement has an option for the responding state to tell the initiating state that they are going to proceed with administrative enforcement; however, the initiating state does not have an option to ONLY request administrative enforcement on the Transmittal #1.	Addition	Administrative Enforcement	We agree with this comment. The instructions have been changed to be consistent with the form.
35	State	Transmittal #1	Form Section I-Action: #3 does not mirror the instructions. Should read "Take the following action on an existing responding tribunal order and forward payment to the initiating state's SDU:".	Consistency - I		We agree with this comment. The instructions have been changed to be consistent with the form.
36	State	Transmittal #1	Instructions Page 4: Section II Case Summary: The final bullet refers to the "Registration Statement" instead of the new form name "Letter of Transmittal Requesting Registration." This should be changed for consistency.	Consistency - I		We agree with this comment. The instructions have been changed to be consistent with the form.
37	State	Transmittal #1	In the space marked To., the instruction indicates that the name and address of the court or agency should be listed. However, the form only indicates that the agency name and address should be provided. It is suggested that the instruction be modified to mirror the information requested on the form.	Consistency - I		We agree with this comment. See response to comment #35.
38	State	Transmittal #1	The instruction quotes the direction on the form for item 3, but the quotation is incorrect The instruction should read as follows: Check Item 3 "Take the following action(s) on the responding tribunal's order and forward payment to the initiating state's SDU."	Consistency - I		Thanks you for your comment. The checkbox has been changed due to another comment and now reads: [] Change person/entity entitled to receive funds and enforce

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Transmittal #1

39	State	Transmittal #1	The instruction quotes the direction on the form for item 3D, but the quotation is incorrect The instruction should read as follows: Change payee and enforce ..."	Consistency - I		We agree with this comment. The following actions for modification were added to the Transmittal #1: Under #3 the following checkbox was added: [] Modify then close the intergovernmental IV-D case Under #4 he following checkbox was added: [] Register, modify, then close the intergovernmental IV-D case
40	State	Transmittal #1	Same question we had on the Letter of Transmittal Requesting Registration – are we no longer allowed to request registration of the order for modification only?	Addition	Modification Only	We agree with this comment. See response to comment #40
41	Organization	Transmittal #1	The option to Register for Modification only has been removed. Please add this option back to the forms . For example, a case where State A has the original order, CP resides in State B, and NCP resides in State C: NCP (C) may request a modification of the child support order in State B, but NCP's state (C) does not want State B to enforce it. Modification is the only action necessary.	Addition	Modification Only	We disagree with this comment. This information is on the Uniform Support Petition and General Testimony.
42	State	Transmittal #1	The checkboxes which allowed the requesting jurisdiction to identify who is requesting the modification have been removed from the form. State requests these checkboxes be restored. We need to know who the requesting party is to accurately determine Continuing Exclusive Jurisdiction (CEJ). It would also be beneficial to State to add "A copy of the Request for Modification" to Section VII. Attachments.	Addition Change	Modification Only	We agree with this CommNet. The bullet now reads: "• The individual seeking to register the order for modification does not reside in the responding state; AND".
43	State	Transmittal #1	Instructions page 3 of 4; propose second bullet of last text box that begins with "Do not ask a responding state to modify the order of another unless the following facts exist" be revised to read "The individual seeking to register the order and requesting the modification does not reside in the responding state; and..."	Change	Modification Only	We agree with this comment. The statement now reads" "Do not ask a responding state to modify the order of another state unless the following facts exist:"
44	State	Transmittal #1	The instruction provides that a responding state should not be asked to modify the order of "another" unless the listed facts exist These facts reference an order issued by a state. Therefore, it is recommended that the instruction be revised to clearly reference another state and read as follows: Do not ask a responding state to modify the order of another state unless the following facts exist.	Change - I	Modification Only	We agree with this comment. The statement now reads" "Do not ask a responding state to modify the order of another state unless the following facts exist:"

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Transmittal #1

45	State	Transmittal #1	<p>State request OCSE clarification on the reason or purpose for removing the "reason for registration". Previously, IV-D agencies would state the requested reason for registration including enforcement, modification or both.</p> <p>As drafted the revised Transmittal #1 requires registration for "enforcement". A IV-D program can no longer request registration for modification only. This change is similarly noted on changes made to the "Letter of Transmittal Requesting Registration". State believes the option to request modification only is important and that OCSE forms should not request and require enforcement on all options for registration. Consider the common intergovernmental scenario:</p> <p>State 1 order and both parties move out of State 1. State 2 registers the State 1 order in State 3 for enforcement against the noncustodial parent. State 3 issues an income withholding, collects payments and forwards payments to State 2. Noncustodial parent is injured, becomes eligible for and receives SSD, and request modification. UIFSA requires that CEJ for a downward modification occur in State2 (as the home of CP/ DP and non-moving party). State 3 would facilitate a request to Sate 2 to register the State 1 order for modification only in State 2.</p>	Comment - Concern	Modification Only	<p>We agree with this comment. See response to comment #40.</p>
46	Organization	Transmittal #1	<p>#1 - Action 3(D) Change payee and enforce - "change payee" may need reworded to "person or agency entitled to receive funds has changed". "Change of payee" is confusing in light of the statutory use of the term in UIFSA § 319; a direct prompt to add documentation will help to speed response time.</p> <p>#2 - add "(proof of custody change or assignment attached)" directly to form.</p>	Change	Change of Payee	<p>#1 - We agree with this comment. We have changed the checkbox to read: "[] Change person/entity entitled to receive funds and enforce".</p> <p>#2 - We disagree with this comment. State law varies. We have revised the instructions to direct the initiating agency to contact the responding agency to determine any additional documentation or pleadings needed under the responding state's law to complete the requested action.</p>
47	State	Transmittal #1	<p>Section I, #3: Request a section E, Re-direction of payment. Redirect is different from section D, Change of Payee. (See line 17)</p>	Addition	Redirection	<p>We disagree with this comment. We have created a new form the Child Support Agency Request For Change Of Support Payment Location Pursuant to UFSA § 319.</p>

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Transmittal #1

48	State	Transmittal #1	<p>We would like a section on the Trans #1 to request that once they set up redirection then they send us order, pay histories and affidavit of arrears. Responding to - Note that for the Trans #3 instructions, a Trans #3 should only be used to obtain documents when the other State won't have a IV-D case.</p>	Addition	Redirection	<p>Thank you for your comment. We assume the commenter is requesting documentation necessary to allow the initiating agency to set up the correct arrears balance in its SDU. The workgroup does not believe a place is needed on the Transmittal #1 form or instructions for the initiating agency to request the "order, pay histories and arrears balance" from the responding agency once an interstate case has been established in the responding jurisdiction. This information can be accommodated under section VI.</p>
49	State	Transmittal #1	<p>In a redirect situation, do we still need to send this form along with the CHILD SUPPORT AGENCY REQUEST FOR CHANGE OF SUPPORT PAYMENT LOCATION PURSUANT TO UIFSA SECTION 319(B) and check #3(d) IN Section I.?</p>	Question	Redirection	<p>Thank you for your comment. This form does not need to be sent with a Child Support Agency Request for Change of Support Payment Location Pursuant to UFSA § 319 form. We will clarify this point on the instructions for the Child Support Agency Request for Change of Support Payment Location Pursuant to UFSA § 319 form.</p>

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Transmittal #1 Acknowledgment

#	Submitted By	Form	Comment	Category	Common	Comments/Notes
1	State	Transmittal #1 Acknowledgement	Is there a reason the case type was removed? We feel it would be helpful and more uniform to have it here since it is also on the Transmittal #1.	Addition	Case Type	We disagree with this comment. The initiating state has the case type so it does not need that information to be sent back. The case number is on the form for the initiating state to use.
2	State	Transmittal #1 Acknowledgement	CT SES strongly supports the "acknowledgment form" and suggests that a sub-box be included in the right column to indicate whether the requested order needs to be "certified" or just a copy.	Comment - Supportive Addition	Certified	We agree with this comment. Sometimes the tribunal insists on having a certified copy of the order. We have modified the form to include: [] Support order(s) [] Certified Order [] Copy of Order
3	State	Transmittal #1 Acknowledgement	Transmittal should have the "NOTE:" regarding form being sent through EDE and/or CSENet and the accompanying instructions.	Addition	CSENet	We agree with this comment. CSENet and EDE have been added to the form and the instructions
4	State	Transmittal #1 Acknowledgement	We would like the block of information from the Transmittal #1 added since this is a new form that can be sent through EDE: o This form sent through EDE	Addition	CSENet	We agree with this comment. See response to comment #3.
5	State	Transmittal #1 Acknowledgement	Header Info: Recommend adding the check boxes for submitted through CSENet or EDE.	Change	CSENet	We agree with this comment. See response to comment #3.
6	State	Transmittal #1 Acknowledgement	We suggest adding "Divorce Decree" under "Additional information needed."	Addition	Divorce Decree	We disagree with this comment. This could be included in the remarks section if it is needed. This is not something that is listed on the Transmittal #1.
7	State	Transmittal #1 Acknowledgement	Need check boxes like there are on the Uniform Support Petition to indicate whether the Petitioner is the obligee or obligor and the same for the Respondent	Addition	Obligee/Obligor	We disagree with this comment. The suggestion made by the commenter would be helpful to the tribunal, however, this form is only sent to the initiating IV-D agency and used for IV-D purposes.
8	State	Transmittal #1 Acknowledgement	We would like the information regarding the original order and the non-modifiable elements included, i.e. age of emancipation.	Addition	Original Order	We disagree with this comment. This could be included in the remarks section if it is needed for a particular case or looked up on the IRG.

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Transmittal #1 Acknowledgment

9	State	Transmittal #1 Acknowledgement	<p>We neither support nor oppose the Acknowledgment being a standalone form. We ask that consideration be given to including an option to indicate under "Arrears statement/payment history" and "Support order(s)" if the document "Must be certified". This option is given on the Child Support Enforcement Transmittal #3 - Request for Assistance/Discovery, Section I, Item 1, and we believe it would be useful here as well.</p>	Addition		<p>We agree with this comment. Sometimes the tribunal insists on having a certified copy of the payment history/arrears statement and/ or order. We have modified the form to include: <input type="checkbox"/> Arrears statement/payment history <input type="checkbox"/> Certified Order <input type="checkbox"/> Copy of Order Also see the response to comment #2. We have modified the instructions to read: Indicate whether any requested arrears statement/payment history or support order(s) should be certified or a copy. We had to switch the check box for Declaration in Support of Establishing Parentage and the Arrears statement/payment history in order to fit the option.</p>
10	Organization	Transmittal #1 Acknowledgement	<p><input type="checkbox"/> Your case has been forwarded to - should not be a check box which indicates a permissive fill in. The biggest delay in 2 state cases is lack of communication; agencies should definitely have to fill this out.</p>	Addition		<p>We disagree with this comment. Some states work all of their Intergovernmental cases in the Central Registry. Additionally, in states that forward Intergovernmental cases to local offices, sometimes the case cannot be forwarded before the acknowledgment is sent because additional information from the initiating state is necessary and requested with the acknowledgment.</p>
11	State	Transmittal #1 Acknowledgement	<p>Acknowledgment - As an administrative process state, we are VERY supportive of the addition of the option "Responding jurisdiction will process with administrative enforcement of the order without registration." This up-front notification will let the other state know we are not immediately proceeding with registration and hopefully help ease frustration from the initiating jurisdiction at a later date if registration is then needed for legal action. #1 - We do suggest one slight tweak to this statement, changing it to "Responding jurisdiction will attempt to process with administrative enforcement of the order without registration". The addition of the word "attempt" will let the other state know we are going to TRY to work the case administratively. If the obligor contests our Notice of Administrative Enforcement, judicial registration is immediately necessary. #2 - Under the "Your case has been forwarded for action to" field, we would suggest adjusting the wording to ensure a specific office/agency is provided rather than general information. An option would be "Local agency/office name" for this field. If a state knows the specific local office name, it makes it easier for communication both at the time of receipt and later on in the case.</p>	Addition		<p>We disagree with these comment. Comment #1 - The language on the form clearly indicates that the responding state will not immediately proceed to register the support order, rather, the state will take action to administratively enforce the order. Comment #2 - Some states provide all services on intergovernmental cases in the central registry. The information requested on the form regarding where the responding state forwarded the case allows states the flexibility to include the appropriate contact information for initiating state follow up.</p>

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Transmittal #1 Acknowledgment

12	State	Transmittal #1 Acknowledgement	The form adds a check box to indicate that 'Responding jurisdiction will proceed with administrative enforcement of the order without registration'. The value of this information to the initiating state is unclear. Moreover, the decision is not made in the state's Central Registry when a Transmittal #1 is received and the case set up. Our response to this requirement would be to program our system to check the box the same way for all cases even though in some cases we may enforce before the order is registered. This could be confusing to customers and state staff. We believe other states will be similarly affected. Recommendation: Remove the check box.	Change		We disagree with this comment. If it is state policy is to administratively enforce, then checking the box automatically would work.
13	State	Transmittal #1 Acknowledgement	We feel the Acknowledgement statement "Return this form to the initiating jurisdiction" might be better if it were placed higher on the form. Possibly closer to the title of the form.	Change		We agree with this comment. The following has been added to the form and instructions: (Return this form to the initiating jurisdiction.)
14	State	Transmittal #1 Acknowledgement	We strongly supports the "acknowledgment form" and suggests that a sub-box be included in the right column to indicate whether the requested order needs to be "certified" or just a copy.	Comment - Supportive	Certified	We agree with the comment. We have added checkboxes next to the support order which indicate whether it is a certified order or a copy of the order.

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Transmittal #2

#	Submitted By	Form	Comment	Category	Common	Comments/Notes
1	State	Transmittal #2	In section II. Intergovernmental Closure Actions, on the second page, #5, it would make more sense to say, ". . . your agency failed to respond to the 60-day notice of dated _____ (mm/dd/yyyy)."	Change	60-day Notice	We agree with this comment. Under item II.5, for clarity, we've revised the sentence to say "The responding agency has closed its IV-D intergovernmental case because your agency failed to respond to the 60-day notice dated _____ (mm/dd/yyyy)."
2	State	Transmittal #2	II. Intergovernmental Closure Actions: 1. Can you add something that requires the actual federal closing code be inputted?	Addition	Case Closure	We disagree with this comment. The workgroup decided not to require the state to input the regulatory citation for case closure, but the state is required to list the reason for case closure in Section II - 1 (and the general case closure regulation is cited in the instructions). We provided the states flexibility to decide how to complete the case closure criteria (either manually, paraphrase the regulatory reason, CSENet code, narrative, regulatory citation).
3	State	Transmittal #2	Form Section II. Intergovernmental Closure Actions: #1 should read – "The initiating agency has closed its IV-D case and you may proceed with closure of your responding intergovernmental case because ____." This change will clarify the actual request, rather than have it follow the blank lines and be separated from the rest of the sentence.	Change	Case Closure	We disagree with this comment. The purpose of II.1 is to notify the responding state pursuant to 45 CFR 303.7(c)(11) that the initiating state has closed its case and the specific reason for the initiating state's closure; the commenter's rewording would not be as clear. However, we can revise the last sentence to be more directive in requesting case closure by the responding state. We have changed the form to read " Proceed with closure of your responding IV-D intergovernmental case".
4	State	Transmittal #2	Under Section II, we believe inclusion of paragraph 5 is unnecessary, as the responding agency already provides notice of the upcoming case closure in paragraph 4. Additionally, from an operational standpoint, our automated system will not generate a closing notice on a case that is already closed to IV-D services.	Change	Case Closure	We disagree with this comment. 45 CFR 303.7(d)(10) requires the responding state to notify the initiating agency when a case is closed pursuant to 303.11(b)(12) - (14) and 303.7(d)(9).
5	State	Transmittal #2	II. Intergovernmental Closure Actions, Intergovernmental closure - Move entire section to page 2.	Change	Case Closure	We agree with this comment. In order to keep the response to II.1 intact, we have moved section II to the following page.
6	State	Transmittal #2	State would appreciate clarification on the use of this form. Based on the instructions provided, it appears this form can be used as an intergovernmental notification of case closure with no other notice required. Is this a correct interpretation for the use of the form?	Question	Case Closure	Thank you for your comment. Yes, this is a correct interpretation. This form can be used for notification of case closure according to federal regulations. Under 45 CFR 303.11(b)(12), prior notification is required before a responding state can close an intergovernmental case for noncooperation by the initiating agency.

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Transmittal #2

7	State	Transmittal #2	It would be nice to have checkboxes by the contact info line showing if state can be contacted on CSENet, QUICK, or EDE	Addition	CSENet	We disagree with this comment. The workgroup believes a checkbox might be confusing and would require extra programming. CSENet and QUICK have methods for conveying worker information if states opt to use them. (Same comment on the T1 and T3.)
8	State	Transmittal #2	Header Section - The field "this request for information sent through CSENet" seems confusing. If the information is transmitted via CSENet, why would you also send a hard copy of a Transmittal #2? You would only need to physically send this form for limited reasons such as attaching documentation or sending written notice as a follow up if there was lack of response to the CSENet requests.	Question	CSENet	Thank you for your comment. This indicates that the initial request was sent through CSENet and that it was not acted on. States may also send the initial request through CSENet and the follow-up materials through another means. This will facilitate matching the initial request with the follow-up materials. Other states still require follow-up hard copy be sent.
9	State	Transmittal #2	Section II. Intergovernmental Closure Actions - We support the addition of this closure related section that fits the needs of both initiating and responding jurisdictions. Once again, this information will likely be transmitted via CSENet transactions without the need for this hard copy.	Question	CSENet	We agree with this comment. Unfortunately, there are still 20 states that have not coded CSENet to send and receive all the case closure reasons.
10	State	Transmittal #2	Consider adding a field for states to include the current "balance" of the case according to their system. CT SES believes that by including this information in all subsequent communications, States will be more likely to identify inconsistencies and prompt follow-up. For example, CT will see when a NY order or case has a higher balance (as a result of a COLA adjustment) that is not reflected on the CT case and prompt CT to verify and update our records.	Addition	Current Balance	We disagree with this comment. We cannot require a state automatically to provide the current balance every time a state sends a T2, although it may be a best practice. The form includes items to request or provide arrears balances and accrued interest under items 1.8 and 1.12.
11	State	Transmittal #2	Under section I. Can a check box be added for "debt calculations". This is a common request between states.	Addition	Debt Calculations	We agree with this comment. The concept of a "debt calculation" is different/more detailed than items 1.8 or 1.12, "arrears balances and accrued interest." Also this information is a useful/common request. Because there are no common definitions for "debt calculation" across states, we are adding two new case processing actions - in both the "providing" and "requesting" sections - to incorporate common requests for payment/debt information, and also including definitions in the instructions. We have added "payment history" and "arrears calculation" to the Section 1 providing list.

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Transmittal #2

12	Organization	Transmittal #2	I. Case processing actions: Providing - After "Notice of healthcare coverage change" add "(see Section III for detailed explanation)". Agencies need more information regarding healthcare coverage.	Addition	Health Care Coverage	We agree with this comment. In order to encourage states to provide details on the healthcare change, we will add in the recommended parenthetical instruction, and also indicate that information may be in a separate attachment. We will provide instructions about what type of information should be provided. We have changed the form to add "(See Section III or attachment)" after "Notice of healthcare coverage change".
13	State	Transmittal #2	Section 1, #6 - request clarification as to what is included in a health care coverage change. i.e. cash medical, I.H.S., etc.	Clarification	Health Care Coverage	We disagree that additional information needs to be added to the face of the form. However, we have expanded the instructions to this item to provide more detail about what type of information should be provided regarding the change in healthcare coverage. We have also added an instruction on the face of the form to provide details under section III which may encourage better communication on the issue. In order to provide space we have switched items 6 and 8 on the form and in the instructions.
14	State	Transmittal #2	Need check boxes like there are on the Uniform Support Petition to indicate whether the Petitioner is the obligee or the obligor and the same for the Respondent	Consistency	Obligee/Obligor	We disagree with this comment. Information about the obligor/obligee is on the Child Support Agency Confidential Information Form. The suggestion made by the commenter would be helpful to the tribunal, however, this form is only sent to the initiating agency and used for IV-D purposes.
15	State	Transmittal #2	Section I. Case Processing Actions: Item 14. does not have enough space	Change	Space	We disagree with this comment. For the item "Other," we have added "(list and describe in section III)" to the form to help clarify the instructions.
16	State	Transmittal #2	Section I. Case Processing Actions - We like the separate sections of "Providing" and "Requesting". We suggest the addition of following selections in the "Providing" and "Requesting" sections: Birth Certificate/Record Certified Orders/Documents	Addition		We disagree with this comment. Birth certificate/record and certified orders/documents can be requested specifically under "other" for both providing and requesting actions. We believe these types of requests will be infrequent at this stage of an intergovernmental case.

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Transmittal #2

17	State	Transmittal #2	Please clarify if this form should be used for an initial request for administrative review for contested debt certification if the issuing state does not have an open case. Unfortunately this form does not provide enough information for a state to proceed on this request. We suggest moving this option to either the Transmittal# 1 or the Transmittal# 3.	Comment - Concern		We disagree with this comment. T-2 is used only when there is an existing intergovernmental case between the two jurisdictions. T-3 permits a limited services request for administrative review of contested debt certification when there is not an existing intergovernmental case with the order issuing state. We will amend the instructions to clarify the appropriate use of each form. To clarify, we have revised the instruction by adding the following language: "When you are the submitting state and have an intergovernmental case with the order issuing state, and the obligor contests the submittal for offset and requests an administrative review in the order issuing state, you should use this form to ask the order issuing state to provide the arrears balance. Explain in section III." Training issue.
18	State	Transmittal #2	Page 1, Heading/Caption: In the space marked To:, the instruction indicates that the name and address of the court or agency should be listed. However, the form only indicates that the agency name and address should be provided. It is suggested that the instruction be modified to mirror the information requested on the form.	Consistency - I		We agree with this comment. The form and instructions should align. Because the transmittals are designed to be sent between agencies only, the instructions should be revised to eliminate reference to courts. We have aligned the instructions to remove the reference to "court."

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Transmittal #3

#	Submitted By	Form	Comment	Category	Common	Comments/Notes
1	State	Transmittal #3	Page 1, Section I. Action: The instructions provided prior to the first listed action indicate that the requesting agency is asking for the certain limited.services. The instructions provided prior to the seventh listed action indicate that the requesting jurisdiction is asking for certain limited services which may be provided at state option. It is suggested that a consistent term be used to identify the requestor (i.e., "agency" or "jurisdiction") with preference toward aligning the term with the governing regulations.	Consistency	Agency/ Jurisdiction	We agree with this comment. The form and instructions were changed from requesting jurisdiction to requesting agency to conform with 45 CFR 303.7(a)(8).
2	State	Transmittal #3	There should be some space for arrears balances, especially for option 7, Assistance with a lien / levy.	Addition	Arrears	We disagree with this comment. Since information that accompanies a lien/levy request may vary, we disagree with adding new fields on the form. However, we have revised the instructions to direct the state to attach information. The instructions were changed at the end of item 7 to add "Attach an arrears balance and/or provide other information in section II that the assisting agency may need." Also see response to comment #3.

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Transmittal #3

3	State	Transmittal #3	Since many states approach the limited service of attaching FIDM (Financial Institution Data Match) funds differently, we feel this should be listed as an option here. You would also need an arrears balance to complete this.	Addition	Arrears	<p>Thank you for your comment. Several commenters discussed including high-volume automated enforcement in interstate cases (AEI), FIDM or lien/levy requests on this form. Commenters requested adding AEI or FIDM as a required service since AEI is required under the limited services regulation, 45 CFR 303.7(a)(8). Workgroup members also noted that many states use the T3 currently for making AEI requests, and not having AEI on the new form would be disruptive.</p> <p>In response to the comments and workgroup concerns, we are adding AEI as a required limited service check box. However, since information that accompanies an AEI request may vary, we disagree with adding other new fields on the form. Instead, we will include instructions for the requesting state to provide information as required by the assisting state.</p> <p>We changed the form to add "Assistance with AEI" as item #7 under Action. 1. We renumber the other items accordingly on form and instructions. We changed the instructions to add the new item #7: "Check Item 7 "Assistance with AEI" if you want assistance with high-volume automated enforcement in interstate cases (AEI). Check the Intergovernmental Reference Guide (IRG) for state-specific requirements."</p>
4	State	Transmittal #3	In the heading of the Request, there are two fields labeled "Assisting IV-D Case Identifier". We believe the second field is supposed to be labeled "Assisting Tribunal Number".	Change	Assisting IV-D Case Identifier	We agree with this comment. The form was revised to change the duplicative field to "Assisting Tribunal Number."
5	State	Transmittal #3	In the Instructions, page 1, last italicized text box, the labels "IV-D case identifier" and "tribunal number" are not consistent with the corresponding labels on the form, which include "Assisting IV-D Case Identifier" (twice), "Requesting IV-D Case Identifier", and "Requesting Tribunal Number". For clarity purposes, we believe the labels used in the instructions should be verbatim with the labels used in the form.	Change	Assisting IV-D Case Identifier	We agree with this comment. See response to comment #4.
6	State	Transmittal #3	Page 1, Heading/Caption: The information provided for the assisting agency includes two (2) fields for the assisting IV-D case identifier. It is recommended that the duplicate field be removed and replaced with a field for the assisting tribunal number if appropriate.	Change	Assisting IV-D Case Identifier	We agree with this comment. See response to comment #4.

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Transmittal #3

7	State	Transmittal #3	In the heading of the Acknowledgment, the option to check "PII Form Attached" was included. We do not believe it would be necessary to attach a PII Form to the Acknowledgment. The option was not included in the Transmittal 1 Acknowledgment.	Change	Attach PII	We agree with this comment. Confidential Information (PII) is not needed on the acknowledgment form. We will also ensure that the Child Support Agency Confidential Information Form (formally PII Form) check box at the top of CSE Transmittal #3 is similar to the formatting on the other transmittals.
8	State	Transmittal #3	1. Action, Requesting - Please add ability to request a copy of the birth certificate/record for children born in your state. The state should have the option to provide if the record is available.	Addition	Birth Certificate	We disagree with this comment. We believe a request for a birth certificate as a limited service (to a "third" state) is infrequent and can be requested under the "other" action, 1.10.
9	State	Transmittal #3	Instrucitons - Page 1, Heading/Caption: In the space marked To:, the instruction indicates that the name and address of the court or agency should be listed. However, the form only indicates that the agency name and address should be provided. It is suggested that the instruction be modified to mirror the information requested on the form.	Consistency	Court/Agency	We agree with this comment. The form and instructions should align. Because the transmittals are designed to be sent between agencies only, the instructions should be revised to eliminate reference to courts.
10	State	Transmittal #3	It would be nice to have checkboxes by the contact info line showing if state can be contacted on CSENet, QUICK, or EDE	Addition	CSENet	We disagree with this comment. The workgroup believes a checkbox might be confusing and would require extra programming. CSENet and QUICK have methods for conveying worker info if states opt to use them.
11	State	Transmittal #3	On Page 2 under "Your case has been forwarded for action to:" should the email line be added to this section, similar to the way it is in this section on the Transmittal #1 – Acknowledgment?	Addition	e-mail	We agree with this comment. The form will be changed to add an e-mail field consistent with the field on the T1 acknowledgment form. The formatting for the two acknowledgment forms should generally be consistent. An exception to this is towards the bottom of the acknowledgment form, above the contact information; the word "case" in the sentence "Your case has been forwarded for action to:" should be changed to "request," since the assisting state is not opening a case in response to the limited service T3 form. The instructions will be changed to align with the form.
12	State	Transmittal #3	Will States be allowed to truncate this form, and or other OCSE forms, generated on certified state systems if fields are not applicable? For example, the Transmittal #3 is one page with a significant amount of space allocated for the "Action"; however, very often states need only select one item from that list. If States are allowed to truncate this section so that only the action requested is provided, then states will have more room to specify "Other Pertinent Information". This form is most helpful if states can provide the case specific information needed on the respective case to proceed.	Clarification	Form Automation	The intergovernmental forms are cleared by OMB and the order and content of the fields are not intended to be altered. If an agency does truncate a transmittal form, it may risk having the form rejected by the receiving agency.

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Transmittal #3

13	State	Transmittal #3	#1 - Under Section I of the Request, a number 7 should be added to include a request for the required limited service of high-volume automated administrative enforcement (e.g., identification of assets through automated data match) per 45 CFR 303.7(a)(8). #2 - In addition, per our comment on UIFSA 319, we believe a number 8 should be added for Section 319(b) requests. This would require the current numbers 7 through 10 to be renumbered 9 through 12.	Addition	High-Volume Automated Administrative Enforcement	Thank you for your comment. #1. See response to comment #3. #2. We disagree with this comment. States will not use the transmittal 3 to make a 319(b) request, rather they will use the new stand alone form "Child Support Agency Request for Change of Support Payment Location Pursuant to UIFSA § 319".
14	State	Transmittal #3	There should be space for the requesting state to indicate what kind of lien / levy and what is attempting to be seized.	Addition	Lien/Levy	We disagree with this comment. The instructions are self-explanatory.
15	State	Transmittal #3	Proposed item 7 (Assistance with a lien/levy) of the Transmittal should be moved from the section that states, "The requesting jurisdiction asks for the following limited services which may be provided at state option" and instead placed in the above section which states, "The requesting agency asks for the following required limited service(s)."	Change	Lien/Levy	We disagree with the comment. Lien/levy is not a required limited service as it is not included in 45 CFR 303.7(a)(8).
16	State	Transmittal #3	The current placement of item 7 is confusing and implies that a state has an option in a limited service request to assist another state with a lien/levy. However, states are required to assist each other with lien/levy requests via a limited service request or a state to state request pursuant to Section 466(a)(14) of the Social Security Act and the expansions allowed by the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996. State believes moving #7 to the prior section will provide the necessary clarification.	Change	Lien/Levy	Thank you for your comment. See response to comment #3.
17	State	Transmittal #3	State has some confusion regarding the use of the transmittal #3. This form seems to be specifically designed for limited services cases and additional information needed from the other state. Should the Transmittal #3 be used in place of the Transmittal #1, if only limited services are being requested? We very rarely see this form being used and it is usually to request additional information. The Transmittal #1 is what we normally see when limited services are being requested.	Clarification	Limited Service	Thank you for your comment. T-3 is used exclusively when the requesting state is only seeking a limited service and is not seeking to establish a full interstate case with the assisting jurisdiction.
18	State	Transmittal #3	Current practice is to submit a request for "Limited Services" only on cases other than IV-D cases. Per the draft summary of the form, the instructions provided, and the options listed in Section I, we understand the changes to this form remove that limitation and a limited service request can now be submitted for a IV-D case with the expectation that states will provide assistance equally for both IV-D cases (even when the initiating jurisdiction is not requesting the responding jurisdiction to open a case) and non-IV-D cases. If this is not an intended change, the instructions and form should make it clear that the limitation still exists.D16	Comment - Concern	Non IV-D	Thank you for your comment. As noted in the summary sheet for the T3, the T3 "provides a standard format for a IV-D child support agency to request another jurisdiction to provide limited services...where there is no request for the assisting jurisdiction to open an interstate IV-D case." A state may use the T3 to request a limited service regardless of whether the assisting state has a non-IV-D case or its own IV-D case.
19	State	Transmittal #3	Need check boxes like there are on the Uniform Support Petition to indicate whether the Petitioner is the obligee or the obligor and the same for the Respondent	Addition	Obligee/Obligor	We disagree with this comment. Information about the obligor/obligee is on the Child Support Agency Confidential Information Form. The suggestion made by the commenter would be helpful to the tribunal, however, this form is only sent to the initiating agency and used for IV-D purposes.

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Transmittal #3

20	State	Transmittal #3	Propose the addition of an Action check box reading: "Assistance with quick locate/locate only."	Addition	QUICK	We disagree with this comment. Request for assistance for quick locate can be made through CSENet, or by using the Child Support Locate Request form for tribes and states without CSENet, or the OCSE state services portal. We have changed the Instructionsi In the first paragraph under Section I. Action, to insert after the second sentence: "To make a quick locate/locate only request, use CSENet, or, for states and tribes without CSENet, the Child Support Locate Request form. You may also make locate inquiries through the OCSE State Services Portal."
21	State	Transmittal #3	#1 - Section I. Action - We like the clear distinction between the mandated limited services and those that are optional. The terminology however needs to be the same on the form. The required services statement says "requesting agency" while the state option leading statement states "the requesting jurisdiction". We believe both should be "requesting jurisdiction". # 2 - We like that the user can choose whether the orders and payment records must be certified. #3 - We would like "Assistance with copy of birth certificate/records and supporting documents" to be added as a selection.	Addition	Requesting Jurisdiction/ Agency	#1 - We agree with this comment. Similar to comment #1 and #27. We will change the form and instructions as follows: to use "agency" instead of "jurisdiction" on form above 1.7 and in instructions. #2 - Thank you for your comment. #3 - We disagree with this comment. See response to comment #8.
22	State	Transmittal #3	Recommend separating the acknowledgement into a new form, similar to Transmittal #1.	New Form	Separate Acknowledgem ent	We disagree with this comment. Unlike in response to a T1 request, an assisting state does not build a case on its system in response to a limited service request on the T3. Having the acknowledgment and form together on the T3 allows the assisting state to better track and respond to the request, since the assisting state cannot readily generate a response/acknowledgment on their state system. We revised the footer for page number consistency between form and instructions.
23	State	Transmittal #3	There should also be space for the requesting state to indicate or clarify what kind of financial proof they are requesting (see #8).	Addition	Space	We disagree with this comment. The request for "financial data/proof of respondent's income" is self-explanatory. If a state had a specific or special request, the state could include it under item 10, "other," or in "other pertinent information," section II.
24	State	Transmittal #3	Section III. Other Pertinent Information - We like the addition of a " field which will be helpful sensitive.	Addition		The original comment was incomplete, so we cannot respond..
25	Organization	Transmittal #3	I Action - please return the acknowledgment. Remove the word "attached;" this is awkward	Change		We agree with this comment. The form was changed to remove the word "attached."

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Transmittal #3

26	Organization	Transmittal #3	Acknowledgement - your case has been forwarded to - should not be a check box which indicates a permissive fill in. The biggest delay in 2 state cases is lack of communication; agencies should definitely have to fill this out.	Change		We disagree with this comment. Depending on the request and/or state procedures, the central registry may not forward the limited service request for a response; therefore a check box is appropriate.
27	State	Transmittal #3	Form page 1 In Action I: The top section refers to the "requesting agency" and the second half refers to the "requesting jurisdiction"	Comment - Concern		We agree with this comment. See response to comment #1.
28	State	Transmittal #3	<p>#1 - Section I, Action, includes an option for 'Assistance with administrative review'. Is this the same thing included in Transmittal 2, a request for 'Administrative Review for Contested Debt Certification in the Federal Collection and Enforcement Program'? Are these intended to be different? If yes, an explanation in the instructions would be helpful. If not, the language should be the same in both places.</p> <p>#2 - In the drafting team's summary the notes for Section II concerning 'Other Pertinent Information,' states that 'Verified Address of Employer' has been moved to the PII form. Is it intended that the PII form would be sent along with the Transmittal #3? The responding state would not be setting up a case in responding to a Transmittal #3 request so it is unclear why the PII form would be needed.</p> <p>Recommendation: Add back 'verified employer address' to Transmittal #3 and remove the check box at the top of page 1, 'PII form attached.'</p>	Addition - I Change Clarification	Administrative Review	<p>#1 - We disagree with this comment. The term "administrative review" is consistent with the regulatory language under 45 CFR 303.7(a) (8). While the request on the T3 for "administrative review" may be the same as the request on the T2 for "administrative review for contested debt certification in the federal collection and enforcement program," we believe further definition of the term "administrative review" is not needed.</p> <p>Administrative review is up to state law to define. Administrative review is used on both T2 and T3. The T2 is used if the assisting state is part of the interstate case. The T3 is used when the assisting state is not part of the interstate case.</p> <p>#2 - We disagree with this comment. The form is designed to include an attached Child Support Agency Confidential Information Form. This form includes critical information that is needed by the assisting state to fulfill the limited service request.</p> <p>To request verification of an employer's address, we recommend using CSENet, the Child Support Locate Request form, or the OCSE portal. See response to comment #20.</p>
29	Workgroup	Transmittal #3	Remove "10. Party's signature on attached form" from the requesting agency asks for the following limited service(s), which may be provided at state option.			Workgroup recommended deleting since it is extremely infrequent.

0970-0085 - Attachment 2
Request for Change of Support Payment Location Pursuant to UIFSA 319

#	Submitted By	Form	Comment	Category	Common	Comments/Notes
1	State	UIFSA 319	<p>This form generates many areas of concern. There is the unknown factor of whether courts will consider this "change of payment location" to be an actual modification of their order. If this form is for both IV-D and non-IV-D use, will there be IV-D funding available for the IV-D agency costs associated with this work for non-IV-D cases? In some of the intergovernmental conference calls on this 319 Change of Payment location issue, it has been stated that use of the 319 process should be limited and states should instead consider registration of the controlling order for modification first. The problem with this is that a modification may not be desired. It seems encouraging a modification review basically for the sole purpose of redirecting payments would not be a best practice. What is the authority for a IVD agency to initiate a modification to change the payment location? This form would work on "clean" cases but it is a given that the majority of cases would not fit in to that category. There are many variables that can complicate this Change of Payment location Request. Some examples of possible issues:</p> <ul style="list-style-type: none"> • State has IV-D case open for collection of assigned arrears only. State is enforcing to collect those arrears and wants payments to continue to go through the State SDU. • All parties have left the state, but case remains open at the request of an initiating agency that is different from the agency from whom the 319 request was received. IV-D cases often remain open even when a party is not in the state if the case is paying consistently. The state we are enforcing for would have to close in order to honor the other state's 319 request. We feel that would be the 319 requesting state's responsibility to resolve. • We see an issue keeping track of 319 requests. Obligees often move multiple times to different states, which could result in 319 change of payment location requests from several states. Keep in mind that even if an obligee is in a new state, there may still be arrears owed in the initial 319 requesting state. We feel there should be a process in place to terminate/rescind a 319 request if needed. Also of concern in this scenario is keeping track of the correct arrears in these multiple 319 request scenarios. • Statute of limitations can become an issue of concern. Arrears could be lost due to no payments on the trustee's payment record. 	Comment - Concern	Courts order modification	<p>Thank you for your comment. UIFSA 2008 comments make clear that the § 319(b) process is a limited exception to CEJ rules set out in and authorized by state law, not a request to modify the support order. After a qualifying request from the IV-D agency in the state where the custodial parent receives services, the issuing tribunal designates the SDU in the requesting state as its payment processing location. No other term changes; and the order remains that of the issuing tribunal. The duration, terms, requirements, rules remain that of the issuing jurisdiction. The choice of law rules for employers in § 502(c) remain those of the issuing jurisdiction. Change of payment location under § 319(b) does not give the requesting jurisdiction any authority over the obligor. UIFSA 2008 establishes the conditions that must exist for a IV-D agency to request a change of payment location under § 319(b); however, there is nothing in UIFSA or federal law/policy that requires a IV-D agency where the custodial parent receives services to make a § 319(b) request. Such a request may not be advisable in cases where, for example, there are state arrearages in the issuing state, where the obligor has multiple cases in the issuing jurisdiction, or if ongoing enforcement is needed. Best practice may be for agencies to consult with each other and check the Federal Case Registry before making a § 319(b) request.</p> <p>See response to comment #2.</p>

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Request for Change of Support Payment Location Pursuant to UIFSA 319

2	State	UIFSA 319	<p>Section I. Response of the form's Acknowledgment page should provide a more pronounced option besides "Other" for the receiving/acknowledging state to respond that it does not currently have authority/jurisdiction to modify the issuing-order state's order and/or should allow the receiving/acknowledging agency to indicate whether registration for modification has been completed or is in progress.</p>	Change	Acknowledgment	<p>We agree with this comment.</p> <p>In response to comment 1 and 2, in order to provide clearer communication between states in this complex area, we added a new response [1.4] for the order-issuing jurisdiction to notify the requesting agency that the conditions for 319 are not met (for example, one of the parties remains in the state) and, therefore, the order-issuing jurisdiction is not authorized to take the requested action. We also added clarifying instructions.</p> <p>The form has been changed to add new response 1. 4, "The limited grounds for UIFSA 319 are not met. (See information provided in section II.)" Renummer response "Other" as 5.</p> <p>We have added a corresponding instruction for new section I, item 1.4, "Check item 4 if the limited grounds for UIFSA 319 are not met. Provide the specific reason in section II. Other Pertinent Information."</p> <p>We have also revised the instructions to section 1. Under section I, after "Note:" we have deleted the sentence, "The custodial parent must be the obligee of the child support order. " We have added the sentence, "The requesting agency should contact the order-issuing state and check federal resources (e.g., QUICK, the federal case registry) prior to sending this form to ensure the limited grounds for UIFSA section 319(b) are met."</p>
3	State	UIFSA 319	<p>Sate would not object to another state modifying our order under the circumstances described in section 319(b), and we believe that a change of payment location would constitute a modification of our order, allowing the state making the change to become the controlling order state and thus assume responsibility for maintaining the official financial record for the case, relieving us of that responsibility, and placing it appropriately with the primary agency that is receiving and disbursing the payments.</p>	Comment - Concern		<p>We disagree with this comment. See response to #1. The order-issuing state has no authority to decline a 319(b) request where the statutory requirements are met. Depending on the circumstances, the requesting state may not have CEJ to be able to modify the order. Under the 319 provision, the order-issuing state does not assume CEJ; rather the order-issuing state has the limited authority to change the payment location only.</p>

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Request for Change of Support Payment Location Pursuant to UIFSA 319

4	State	UIFSA 319	In the Acknowledgment, Section III, the field requests the worker's "Direct Telephone Number and Extension". We believe state agencies should have the discretion to determine when it is appropriate or required to provide a direct telephone number for a worker.	Comment - Concern	Acknowledgment	<p>We disagree with this comment. Providing a direct line for a caseworker facilitates effective communication between state IV-D agencies.</p> <p>Comment 47/General: asks that direct telephone lines are required in the contact information. We have added the word "direct" before "phone line" to the forms to emphasize that direct/specific information is preferable.</p>
5	State	UIFSA 319	Recommend separating the acknowledgment into a new form, similar to Transmittal #1	New Form	Acknowledgment	<p>We disagree with this comment. Unlike in response to a T1 request, an order-issuing (assisting) agency is not required to open a case in response to a request under UIFSA 319. Having the request and response/acknowledgment together on one form (as with the T3, for limited services requests) allows the order-issuing state agency to better track and respond to the request, since the assisting agency may not be able to readily generate a response/acknowledgment on its state system.</p>
6	State	UIFSA 319	Language added that indicates that this form is for administrative purposes only.	Statement	Administrative Purposes Only	<p>We disagree with this comment. The form is used for communication between IV-D agencies but may also be used by the IV-D agency in the order-issuing jurisdiction to submit the change of payment location request to the issuing tribunal.</p>
7	State	UIFSA 319	Page 1, Heading/Caption: In State, a copy of the change in payee notice must be sent to the noncustodial parent and the requesting IV-D agency by first class mail. The address information for the noncustodial parent is not provided on the form itself and would need to be obtained from the Personal Identifiable Information (PII) Form. Rather than requiring that the PII form be attached, this form contains a box to be checked by the requesting agency to indicate that the PII form is attached. With reference to Recommendation 6, State recommends that an instruction be included within this section of the form to indicate that the PII form must be attached in most cases so that states can effectuate service of process.	Change Comment - Concern	Attach PII	<p>We agree with this comment. This form should require attachment of the new Child Support Agency Confidential Information Form to provide necessary address and employer information. We have deleted reference to PII form and added the following: "Child Support Agency Confidential Information Form must be attached. The instructions have been changed accordingly. Also, to provide further clarification, we have added instructions to indicate that the CSA Confidential Information form is needed so that the order-state can verify that all parties and children no longer live in the order state.</p>

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Request for Change of Support Payment Location Pursuant to UIFSA 319

8	State	UIFSA 319	Until we have further clarification on pending Section 319 questions, we don't feel we are able to comment on this form. We request the timeframe for comments be delayed until further policy guidance is issued.	Comment - Concern	Cannot Comment	Thank you for your comment. UIFSA 2008 is state law in all jurisdictions and this form is intended to assist states in processing requests under the 319(b) provision. OCSE is currently working with states on implementation issues related to this provision. However, we cannot delay implementation of the new intergovernmental forms.
9	State	UIFSA 319	Recommend adding checkboxes by the contact info line showing if state can be contacted on CSENet, QUICK, or EDE.	Change	CSENet	We disagree with this comment. The workgroup believes a checkbox might be confusing and would require extra programming. CSENet and QUICK have methods for conveying worker info if states opt to use them.
10	State	UIFSA 319	The "Note:" field in the Heading/Caption of the Acknowledgment page should also include a checkbox for CSENet transaction and possibly a checkbox for mail and/or fax. As drafted, it only has two check boxes -one for the non-disclosure finding affidavit and one for sending the form through EDE. However, the policy/additional info box in the instructions for "Section I. Action" of the Request Page indicate "CSENet transactions are the recommended method for making requests or sending information" and provide for EDE if CSENet is not available, followed by mail/fax if CSENet and EDE is not available.	Change	CSENet	We disagree with this comment. Multiple CSENet transactions would be required, involving extensive recoding by states. EDE best accommodates transmitting this form. To clarify the instructions have been amended to add the following: "If CSENet is not listed as an option on the form, then it cannot be used to convey any of the requests for information or IV-D requests provided on the form."
11	State	UIFSA 319	The "Note:" field in the Heading/Caption of page 1 should also include a checkbox for CSENet transaction and possibly a checkbox for mail and/or fax. As drafted, it only has two check boxes- one for the non-disclosure finding affidavit and one for sending the form through EDE. However, the policy/additional info box in the instructions for "Section I. Action" indicate "CSENet transactions are the recommended method for making requests or sending information" and provide for EDE if CSENet is not available, followed by mail/fax if CSENet and EDE is not available.	Clarification	CSENet	We disagree with this comment. See response to comment #10.
12	State	UIFSA 319	Instructions - Second page, Section I. Action, first box: Consider referencing or identifying the appropriate corresponding CSENet transactions that can be used for 319b requests.	Clarification	CSENet	We disagree with this comment. Multiple CSENet transactions would be required, involving extensive recoding by states. EDE best accommodates transmitting this form. See response to comment #11.
13	State	UIFSA 319	Use of the word "Acknowledgment" in the Header of the "Response" is misleading to some users. An acknowledgment, if needed, should be sent upon receipt of the request. If one is needed, it should be a separate page/form. This response notifies the requesting jurisdiction that the action requested has been taken and allows sharing of additional pertinent information. It would be less confusing if the title more accurately reflected the purpose of the form.	Change	Form Names	We agree with this comment. For this form, the term "response" is more appropriate than "Acknowledgment." The term "response" provides more substantive information about actions taken, whereas the term "acknowledgment" (as used on other forms) is an instantaneous notification of receipt of the request. We changed "acknowledgment" to "response" throughout the form and instructions.

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Request for Change of Support Payment Location Pursuant to UIFSA 319

14	State	UIFSA 319	<p>Item #2 in Section I. Response of the form's Acknowledgment page suggests that a conforming withholding notice or administrative notice only needs to be sent to entities that are employers. UIFSA Section 319 only expressly uses the term "employer." The form should clearly indicate whether the receiving/ acknowledging state is also required to issue a conforming income withholding notice or administrative notice to non-employer sources of income that are subject to income withholding and to which the receiving/acknowledging state has issued a withholding notice. Otherwise, if an obligor receives income from a non-employer source of income, the receiving/acknowledging state might not issue a conforming income withholding notice or administrative notice to that source of income. This could cause employer payments to be redirected to the requesting state but non employer payments to continue be remitted to a different state per the order-issuing state's order (for example an obligor could be receiving unemployment and employment income at the same time).</p>	Clarification	Acknowledgment	<p>Thank you for your comment.</p> <p>Section 319(b)(1) requires that the requested support enforcement agency or tribunal "direct that the support payment be made to the support enforcement agency in the state in which the obligee is receiving services." This requires the requested state, in accordance with the state's laws and procedures, to redirect all payments, whether from an employer or non-employer source, to the requesting state. With respect to support payments made through income withholding, section 319(b)(2) requires the requested agency or tribunal to "issue and send to the obligor's employer a conforming income-withholding order or administrative notice of change of payee, reflecting the redirected payments." The term "employer" is defined under the requested state's law.</p> <p>To clarify UIFSA requirements, we have revised the language on the form to mirror the language in UIFSA section 319(b).</p> <p>Training needed for IV-D agencies, tribunals and employers.</p> <p>Under "I. Action," on the form, we have aligned the language more closely to the requirements of section 319(b), and amended the instructions accordingly.</p> <p>Training Needed</p>
15	State	UIFSA 319	<p>Also, in the Acknowledgment, Section I, number 2, there is an option that indicates a copy of the conforming income withholding order reflecting the redirected payments is "attached but employer is unknown". Our automated system will not allow a worker, IV-D or otherwise, to issue an income withholding order if there is no known employer.</p>	Comment - Concern	Acknowledgment	<p>UIFSA 319 requires the order-issuing state to issue a conforming IWO or administrative notice to the employer, reflecting the redirected payments. We understand the concern that some state automated systems are not able to generate IWOs if the employer is unknown. We have revised the item for the "employer unknown" option to make it more general and revised other language in response option 2 for clarity. (see also comment 16b and 17.)</p> <p>Training issue.</p> <p>We have changed the form In the response, under section I, item 2, delete the phrase "sent to the obligor's employer" from the first item and change the third check box response from "Order/notice is attached but employer is unknown" to "Employer is unknown."</p>

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Request for Change of Support Payment Location Pursuant to UIFSA 319

16	State	UIFSA 319	<p>#1 - Acknowledgment Page, Section I. Response - There appears to be no basis in the law to enter an order or administrative notice changing the payment location. The law says: "... a tribunal of this state shall: (1) direct that the support payment be made to the support enforcement agency in the state in which the obligee is receiving services; and..." How does a state direct payments be made to another support enforcement agency? Under federal law and regulations support payments are to be directed to the state disbursement unit.</p> <p>#2 - The option "order/notice is attached but employer is unknown" under #2 in this section is very confusing. We are unclear as to why and how we would issue an income withholding order in this situation. Our system does not issue withholding orders unless an employer is known. Is the expectation that states would issue a document with the employer information blank? We do not understand the reasoning behind this.</p>	Comment - Concern	Acknowledgment IWO	<p>#1 UIFSA is state law. States must follow state law and procedures in meeting the requirements under UIFSA 319(b)(1). We agree that federal law requires the SDU to be the designated payment location and requesting states will be required to provide the SDU address as the new payment location. Training issue. #2 See response to comment #15.</p>
17	State	UIFSA 319	<p>In Section I. 2., the last option in that section indicates "Order/notice is attached but employer is unknown." State does not issue a wage withholding without an identified employer. Is this a practice in other jurisdictions? State's process would benefit from an option that reads "Unable to locate employer, no order/notice attached."</p>	Change	Employer is Unknown	<p>See response to comment #15.</p>

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18	State	UIFSA 319	<p>Page 1, Section I. Action: This form is to be used by a IV-D agency which is providing services to a custodial parent to request limited services to change the payment location of a support order issued by another state to the state disbursement unit (SDU) of the requesting state and to issue a conforming Income Withholding Order/Notice for Support or issue an administrative notice of change of payee. However, this section of the form does not include address information for the SDU of the requesting state. With reference to Recommendation 6, it is suggested that this section include an instruction to reference the Intergovernmental Reference Guide to obtain the address of the SDU of the requesting state.</p>	Addition	IRG	<p>We agree with this comment. Since this is a stand-alone form and it might be filed with the issuing tribunal to complete the actions required under UIFSA 319, the SDU address information should be on the form. The following items are needed on the form for the order-issuing state to fill out the amended IWO: 1) requesting SDU name; 2) requesting SDU address; 3) requesting agency remittance identifier.</p> <p>[Note 1: additional employer-related items needed to complete the amended IWO are addressed under comment #25. Note 2: in addition, the following items are needed but are already on the 319 form: 4) requesting FIPS/locator code; 5) requesting case identifier.]</p> <p>We changed the form to use the SDU related header information from the T1, which includes the SDU name and address, the SDU payment locator code, and state. In addition, we added a new field for "remittance identifier" as part of the header.</p> <p>We modified the instructions to add a new instruction accordingly, consistent with the T1 instructions, but also including the remittance ID field, which is not part of the T1 header.</p>
19	State	UIFSA 319	<p>The Heading/Caption (or other section) of the page 1 of the form should include a space for the requesting agency to provide the remittance identifier(s) and payment FIPS code (if necessary) that the requestor needs to be able to process payments through its SDU. Otherwise, the order-issuing/acknowledging state will/may not be able to provide the remittance identifiers/payment FIPS to the employer when it issues the conforming income withholding order/notice or administrative notice to the employer. The Income Withholding for Support form includes both of these items. If the acknowledging state is not able to provide the other state's remittance identifiers, the employer will not be able to include the appropriate identifiers with its payment when remitting to the requesting state's SDU which could cause a delay in disbursing payments to the recipient, require additional contact between the states and/or the employer, and/or cause a state to hold or return a payment. This delay defeats the purpose of Section 307(e) and 319 to "facilitate redirection of the stream of child support in order that payments be more efficiently received by the obligee."</p>	Clarification	Location Code	<p>We agree with this comment. The requesting state remittance identifier is necessary so the order-issuing state can complete the amended IWO and the employer can remit payments. See comment 18. The form also already has the state's locator code (which can be used on the IWO for the FIPS code, as needed.)</p> <p>See response to comment #18.</p>

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20	State	UIFSA 319	<p>#1 - Item #2 in Section I. Response of the form's Acknowledgment page 2 suggests that the receiving/acknowledging state only needs to list one employer to which the conforming income withholding notice or administrative notice was sent. This field should accommodate multiple employers because obligors may be employed by multiple employers.</p> <p>#2 - Further, the receiving/acknowledging state may need to issue multiple conforming income withholding notices to multiple employers even if the obligor is currently only working for one employer because the state has not issued terminations/released past employers from income withholding. Section 466(b)(1 O) of the Social Security Act and, in particular, 45 CFR 303.100(a)(7) only provide limited circumstances regarding the state is required to issue a withholding termination to past employers to which a withholding notice had been sent.</p>	Addition	IWO	<p>#1. We disagree with this comment. In the case of multiple employers, states may send the order to all employers.</p> <p>#2. We disagree with this comment. Notifying past employers of the new order is not covered under the 319 provision and does not obligate the agency to deviate from regular termination procedures.</p>
21	State	UIFSA 319	<p>Instructions - Second page, Section I. Response: Consider adding a reason/purpose for the last sentence of the third paragraph, "For electronic income withholding ..." Sending a paper copy of a conforming income withholding notice to an e-IWO employer will likely cause employer frustration and complaints.</p>	Clarification	IWO	<p>We agree with this comment. We received several comments disagreeing with the instructions in the response section that requested the order-state using e-IWO to provide a paper copy of the conforming IWO to the employer.</p> <p>Because of the variety of current and emerging state procedures related to UIFSA 319, including procedures for e-IWO and IWO, we believe detailed instructions to states regarding these procedures may not be possible or appropriate. We have changed the instructions to delete the sentence starting "For electronic income withholding."</p>
22	State	UIFSA 319	<p>If other CSE agencies form generation systems and e-IWO processes work similar to State's, agencies will have to complete a work around in order to issue an IWO directing an employer to remit payments to another state's SDU and to put another state's IV-D case number on the payments. For non e-IWO participating employers we will have to manually add the other state's IV-D case number and SDU address because the form automatically populates State's information. For E-IWO participating employers, State will have to complete an IWO manually and send by regular mail.</p>	Comment - Concern	IWO	<p>Thank you for your comment. OCSE recognizes that state automated systems and procedures need to be adjusted to accommodate responding to a § 319(b) request.</p>
23	State	UIFSA 319	<p>In the Instructions, page 3, Section I, option 2, the last sentence indicates for electronic income withholding, the state must generate a paper copy of the conforming income withholding order and send it to the employer. We oppose this direction. If the employer has already received the income withholding order in electronic form, there is no reason to send a paper copy. Sending a paper copy in addition to an electronic version seems contrary to the purpose of sending the income withholding order electronically in the first place. Additionally, employers have vocalized to our program that they do not appreciate receiving a paper copy of the income withholding order when they have agreed to receive the document electronically.</p>	Comment - Concern	IWO	<p>We agree with this comment. See response to comment #21.</p>
24	State	UIFSA 319	<p>Instructions - The form instructions for the Acknowledgment, I. Response section indicate that for electronic withholding, states must generate a paper copy of the income withholding order and send it to the employer. Please provide clarification as to why a paper copy is required for EIWOs.</p>	Comment - Concern	IWO	<p>We agree with this comment. See response to comment #21.</p>

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25	State	UIFSA 319	Section I. Action - Form directs that a "conforming income withholding order or administrative notice of change of payee" to employer be issued. Not only we would likely not have updated employer information on a non-IV-D case, should we be required to take an enforcement action on a non- IV-D case?	Comment - Concern	Non-IVD	<p>We agree with this comment.</p> <p>The requirement to issue a conforming income withholding order is in UIFSA 319(b) and 307(e). However, we agree that if the case is non-IV-D in the order-issuing state and is not currently paying through the issuing state's SDU, it would be a great convenience for the requesting state to provide employer information. The requesting state must attach the CSA Confidential Information form to this form, which includes fields for the obligor's employer name and address. The only information missing is the employer FEIN number. We will include FEIN on the CSA Confidential Information form along with the other employer information.</p> <p>We have modified the form to add the FEIN to the CSA Confidential Information form.</p>
26	State	UIFSA 319	From an operational standpoint, we have several concerns. We understand these requests may be received on cases that are closed to IV-D services or cases that have never been open to IV-D services in the order-issuing state. In these cases, is the order-issuing state to treat these requests as a request for limited services and not open the case to IV-D services? If the case is not open to IV-D services, the automated system in our state will not provide IV-D workers the support necessary to accomplish the requested actions. For example, the IV-D worker would not have the ability to issue a conforming income withholding order reflecting the redirected payments as required per the Request.	Comment - Concern	Operational Issues; IWO	<p>The request for redirection under UIFSA 319 is not a request to open a full interstate case in the order state. As for systems and operational issues, see response to comment #22.</p>
27	State	UIFSA 319	There will also be operation issues if the Request is received in a case that is already open to IV-D services in the order-issuing state. In these cases, we believe it would be more efficient for the requesting state to issue its own income withholding order once the order has been amended to change the payment location. We understand that the form follows the requirements of Section 319; however, in these cases, the order issuing state would likely close its case upon satisfaction of the Request, which would require the order-issuing state to terminate its income withholding order and the requesting state to then issue its own income withholding order. This practice does not seem to be the most efficient and expeditious way to collect child support, which is the premise upon which the drafting of Section 319 was based.	Comment - Concern	Operational Issues: IWO	<p>Thank you for your comment.</p> <p>The requirements in sections 307(e) and 319(b) for the order-issuing state are unambiguous and must be followed when a proper redirection request is made by the custodial parent's state. However, the custodial parent's IV-D agency is not required to use § 319(b) and may use other traditional interstate enforcement methods.</p>
28	State	UIFSA 319	Page 1, Footer: State recommends that the title of the form in the footer be modified to match the title of the form at the top of page 1. The title in the footer would read as follows: Child Support Agency Request for Change of Support Payment Location Pursuant to UIFSA Section 319(b).	Change	Header/Footer Consistency	<p>We agree with this comment.</p> <p>We changed the form to align title and footer.</p>
29	State	UIFSA 319	The form name at the top of the form and the bottom of the form need to match.	Consistency	Header/Footer Consistency	<p>We agree with this comment.</p> <p>See response to comment #28.</p>
30	State	UIFSA 319	Acknowledgment: State recommends that the word "Enforcement" be removed from the title of the Acknowledgment page so as to match the title of the form on the previous page. In addition, it is suggested that the title of the form in the footer be revised to read as follows: Child Support Agency Request for Change of Support Payment Location Pursuant to UIFSA Section 319(b) - Acknowledgment.	Consistency	Header/Footer Consistency	<p>We agree with this comment.</p> <p>See response to comment #28.</p>

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31	State	UIFSA 319	Instructions - Page 1, Footer: State recommends that the word "Enforcement" be removed from the title of the form in the footer so as to match the title of the form. The title in the footer would read as follows: Child Support Agency Request for Change of Support Payment Location Pursuant to UIFSA Section 319(b)	Consistency	Header/Footer Consistency	We agree with this comment. See response to comment #28.
32	State	UIFSA 319	Instructions - The second paragraph of the policy/additional information box at the bottom of page 1 of the instructions uses the term "initiating jurisdiction." This could be interpreted as either the agency initiating the 319b request or as the initiating jurisdiction in a formally registered intergovernmental case. The agency initiating the 319b request and the initiating jurisdiction in a registered intergovernmental case may not be the same. This instruction should be clearly consistent with the intent, purpose, and other instructions.	Change	Initiating Jurisdiction	We agree that the term "initiating" is not appropriate for this form. However, because this is "boiler plate" language used across all forms, we will revise the instruction to be generic. Change to instructions: Per comment, change "initiating jurisdiction" to "jurisdiction".
33	State	UIFSA 319	Form page 1 & 2 footer: the name at the bottom does not match the name at the top of the form. The name at the bottom is: Child Support Enforcement Child Support Agency Request for Change of Support Location Only Pursuant to UIFSA Section 319(b) with Acknowledgment Instructions. Recommend delete "Child Support Enforcement" at the beginning of the title, add "Payment" after "Support," and delete "Only" after "Location".	Consistency	Header/Footer Consistency	We agree with this comment. See response to comment #28.
34	State	UIFSA 319	The word "Enforcement" is included in the title of the Acknowledgment, but is not included in the title of the Form, nor the Instructions.	Consistency	Title Consistency	We agree with this comment. See response to comment #28.
35	State	UIFSA 319	Document is titled "Child Support Agency Request for Change of Payment Location Only Pursuant to UIFSA Section 319(b). Footer of this document says "Child Support Enforcement Agency Request for Change of Support Location Only Pursuant to UIFSA Section 319(b). It appears the document title and footer should match.	Consistency	Header/Footer Consistency	We agree with this comment. See response to comment #28.
36	State	UIFSA 319	#1 Is this a standalone form or would the Transmittal #1 also need to be sent in addition to the new form? #2 Also, state would like to suggest that this form be renamed, something like "Request Change of Payment Location".	Change Question	Form Title	#1 We disagree with this comment. This is a stand-alone form; all additional information is in the attached Child Support Agency Confidential Information Form that will be attached. #2 We disagree with the title change. This form is to be used for the very narrow request allowed under UIFSA 319. To avoid any confusion, the title should be explicit in referencing 319.
37	State	UIFSA 319	We recommend making the title of this form shorter, and removing the number 319, as it might not line up with the number of each state's code of law.	Change	Form Title	We disagree with this comment. See response #2 to comment #36.
38	State	UIFSA 319	The title of the acknowledgment page should more clearly indicate or pronounce that it is the Acknowledgement/Response to the request. As currently drafted, the word "Acknowledgement" is at the end of the title but the form would be clearer if "Acknowledgment" were at the beginning of the title, offset, or highlighted in some manner. Shortening the title may assist with this issue.	Change	Form Title	We agree with the comment We modified the form to add "Response To The" at the beginning of the title to the response page.

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39	State	UIFSA 319	From a legal standpoint, we are concerned that courts in our jurisdiction will interpret this Request as a request to modify the child support order, which would subject the request to the jurisdictional rules set forth in the Uniform Interstate Family Support Act (UIFSA) (2008). Assuming the facts of the case are such that a proper Section 319(b) Request may be made, the continuing, exclusive jurisdiction analysis set forth in §§ 205 and 611 of UIFSA (2008) arguably preclude the issuing state from modifying the order unless: 1) the parties consent in a record or in open court that the issuing state may continue to exercise continuing, exclusive jurisdiction; or 2) the nonrequesting party resides outside of the United States. Changing the payment location of a child support obligation is a material change to the child support order. In [state], satisfaction of this Request would require entry of an amended judgment in district court which modifies the terms of the original judgment to reflect the requesting agency's State Disbursement Unit as the payment location. It seems prudent to anticipate this Request will prompt a jurisdictional challenge from a nonrequesting party. There is nothing in UIFSA or in the comments to the Act which indicate this Request is not a request for modification of a child support order and therefore not subject to the continuing, exclusive jurisdiction analysis.	Comment - Concern	Courts order modification	We disagree with this comment. In addition to the legal basis for modification set forth in sections 611 and 613, UIFSA section 319(b) sets forth a limited legal duty on the order-issuing state to redesignate the payment location on the controlling order to the requesting state's SDU and issue a compliant IWO or an administrative notice of change of payee when (1) when neither the individual parties nor child reside in the order-issuing state; and (2) the custodial parent's state makes the request. UIFSA provides clear legal authority for the tribunal's action when a 319 request is made. Good training / FAQ issue.
40	State	UIFSA 319	In addition to these concerns, we have several comments on the Request. In the Purpose Form to the Request, under "Purpose", the Request is referred to as a "limited services request to change the payment location of a support order issued by another state". If this Request is indeed a "limited services request", we believe it should be accompanied by a Child Support Enforcement Transmittal #3 - Request for Assistance/Discovery, as opposed to being a standalone form. As an aside, if the intent is that the order-issuing state must cooperate with the Request, then federal regulations at 45 C.F.R. § 303.7(a)(8) will need to be amended. Under the regulation currently in effect, the Request is not included among the limited services for which cooperation is required.	Addition Comment - Concern	Limited Service	We agree that using the term "limited services" is confusing in this context. The 319 request is not meant to be a required limited service under the CFR; it is state law. We disagree that there is a need to amend the regulation. We have changed the form to delete the term "limited service" from the first sentence under "Purpose of the Form" in the instructions.
41	Organization	UIFSA 319	The action being requested by this form is a limited services action and as such should be incorporated under the Transmittal #3.	Comment - Concern	Limited Service	We agree that using the term "limited services" is confusing in this context. The 319 request is not meant to be a required limited service under the CFR; it is state law. We disagree that there is a need to amend the regulation. See response to comment #40.
42	State	UIFSA 319	Section V. Dependent Child(ren) Information (page 1). Under this section, it states "Full Legal Name". Since there may be more than one child can you add "(s)" to the end, so that it is clear that more than one child's name may be listed here.	Change	Multiple Children	We agree with the comment. We modified the form to indicate an option to list multiple children and formatted it consistently with other forms.
43	State	UIFSA 319	There needs to be more clarification on the form and the directions for "The order-issuing state tribunal issued the support order." This is under "The following facts exist to permit this request under UIFSA 319(b)".	Addition	Need more direction	We agree with the comment. We have revised the second bullet under "the following facts exist to permit this request..." for clarity. We also added "and" after the second bullet to indicate all the facts must exist. (Also, see comment 62.) We have modified the form so that the second bullet reads, "A tribunal in the requested state issued the support order; and"

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44	State	UIFSA 319	The "Order-Issuing State IV-D Case identifier" field in the Heading/Caption of page 1 should be changed to also accommodate non-IV-D cases. The corresponding instructions indicate that the case may be IV-D or non-IV-D in the order-issuing state.	Addition	Non IV-D	We agree with the comment. The field for the order-issuing state case identifier is meant to be inclusive of IV-D and non-IV-D cases. We have modified the form to change "Order-Issuing State IV-D Case Identifier" to "Order-Issuing Case Identifier," and revised the instructions accordingly.
45	State	UIFSA 319	Instructions - The second bullet under HEADING/CAPTION on page 1 should clearly define which state's case is applicable for checking the boxes.	Clarification	Heading/Caption	We agree with the comment. Because the case status check box information is not needed by the order-issuing state to complete the 319 action, we will remove the check boxes from the form and the response. We will also add clarifying instructions on how to fill out the heading/caption section. We have modified the instructions to add a new bullet: "The requesting state determines the heading." We've also added other clarifying instructions for the form and the response.
46	State	UIFSA 319	The Heading/Caption (or other section) of page 1 and/or the corresponding instruction should clearly identify whether the state listed in the "To:" field must be the same as the state listed in the Order-Issuing State fields. Otherwise, there is a potential for a requesting agency in one state (state Z) to send the request to a state (state Y) that is the responding state in a registered intergovernmental case from an entirely different, third state (state X) that is the initiating state in the registered intergovernmental case. In this scenario, the responding state in the intergovernmental case (state Y) receiving/acknowledging the request has no authority (or at least limited/somewhat procedurally complex and time consuming authority) to modify the initiating/order-issuing state's (state X) support order that contains the payment remittance provisions. This scenario does not comport with the purpose of Section 307(e) and 319 to "facilitate redirection of the stream of child support in order that payments be more efficiently received by the obligee."	Clarification		We disagree with the comment. We believe the instructions are clear. However, see clarifying revisions for the heading in response to comments #44 and #45.
47	State	UIFSA 319	The "Order-Issuing State IV-D Case identifier" field in the Heading/Caption of the Acknowledgement page should be changed to also accommodate non-IV-D cases. The corresponding instructions indicate that the case may be IV-D or non-IV-D in the order-issuing state.	Addition	Non IV-D	We agree with the comment. The requesting state determines the heading. In addition, we've removed the case status check boxes. See response to comments #45 and #49.
48	State	UIFSA 319	The "IV-D Case:" field in the heading/Caption of the Acknowledgement page with the checkboxes for type of case should indicate whether the receiving/acknowledging agency should check a box based on the requesting state's IV-D case or the order-issuing state's IV-D or non-IV-D case. The accompanying instructions also do not clearly define which state's case is applicable for checking the boxes.	Addition Addition - I	Non IV-D	We agree with the comment. See response to comments #45 and #49.

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49	State	UIFSA 319	Should there be a Non-IV-D check box option on the top of the acknowledgment page in case the order issuing state's case is non-IV-D or should the box marked on the acknowledgment represent the status of the case in the other state?	Question	Non IV-D	We disagree with the comment. The heading information in the response is the same information as on the face of the form, that is, the order-issuing state should not change the heading information when it sends back the response. On this form, a non-IV-D field is not appropriate. In order to use the 319 form, it must be IV-D in the requesting state.) See response to comment #45.
50	State	UIFSA 319	We have some concerns about the implications of this Request, both from a legal and operational standpoint. We understand the use of this Request is to be limited and that communication between states prior to making the request is encouraged. However, absent any official guidance from OCSE on this topic, we are concerned the Request may not be used as intended. Among other concerns, we do not believe IV-D workers in the different states will be willing and able to cooperate with each other as OCSE seems to envision. It would have been helpful for states to have had the opportunity to comment on, or at least review, the underlying policy considerations behind Section 319 and the use of this Request prior to the form being issued. However, as it does not appear states will be afforded that opportunity, we feel it prudent to include our concerns in these comments.	Comment - Concern	Official Guidance	Thank you for your comment. OCSE anticipates issuing guidance that will address some of these concerns. No state IV-D agency is required to make a 319 redirection request. UIFSA 2008 is state law developed by the Uniform Law Commission and enacted in all U.S. jurisdictions.
51	State	UIFSA 319	Propose that form be modified in a manner to permit filing in court, for judicial states, of the request, such that it becomes the Order for Change of Payee, becoming a standard form to be used nationwide.	Change	Order for Change of Payee	We disagree with the comment. Nothing about the form precludes it from being filed. However, it is not a standard order, as that would be governed by state requirements.
52	State	UIFSA 319	We feel that the Order-Issuing State language in the caption is somewhat confusing. While we recognize the fact that this form MUST be sent to the order issuing state, we believe possible confusion could be alleviated while concomitantly clarifying that all three (3) criteria in the first section below the caption on page 1 by making the following revisions: "All of the following facts exist to permit this request being sent to the order issuing state tribunal under UIFSA Sec. 319(b): <ul style="list-style-type: none"> • Obligee receives services from the requesting agency; • The order Issuing state tribunal issued the support order; and • Neither the obligor, the individual obligee, nor the child(ren) reside in the order-issuing state."	Change	Order-Issuing State Language	We agree with the comment. We have adjusted the punctuation in the three bulleted items to emphasize that all three items are required and have re-worded the See response to comment #43.
53	State	UIFSA 319	The term "order-issuing state" should be clarified in terms consistent with UIFSA. The order issuing state could be interpreted not only as the initiating state in a registered intergovernmental case, but a corresponding registration order could be issued in the responding state for the registered intergovernmental case.	Change	Order-Issuing State Language	We disagree with the comment. In the one-order world of UIFSA, we believe states will understand that the order-issuing state is that state that issued the controlling support.
54	State	UIFSA 319	Propose that instructions clarify process for ongoing redirection of payment where parties have not left issuing state may be requested as a limited service action, regardless of whether the order was considered a IV-D order in the issuing state. In other words, clarify action required on non-319(b) redirection cases.	Addition	Redirection	We disagree with the comment. This form is meant for a very limited purpose under 319 and not for generally forwarding payments. We have removed "limited services" from the instructions, per comment 40.

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55	State	UIFSA 319	Propose that providing a copy of the order to be redirected is required, not optional	Change	Redirection	We disagree with the comment. While sending the order along with the form may be a best practice, there is enough information on the form for the order-issuing state to be able to locate its order. The instructions encourage the requesting state to send the order if the case is non-IV-D in the order-issuing state. For clarity, we modified the instructions to move the check box for the item "A copy of the issuing tribunal's support order is attached" from "Section I. Action" to under "Section II. Case summary" and adjusted the instructions accordingly.
56	State	UIFSA 319	There is confusion about this form and why it is necessary. It seems as though this form is like a regular Redirect Request; and couldn't this be requested on the Transmittal #1 along with all other requests, i.e. paternity establishment, modification, registration, etc.?	Comment - Concern	Redirection	OCSE disagrees with this comment. This request could not be accomplished via T-1, which is used to establish a new interstate case. This form is meant for a very limited purpose under 319 and not for generally forwarding payments.
57	State	UIFSA 319	States may need additional time for additional legislative changes to accommodate 319b requests beyond just enacting UIFSA 2008.	Comment - Concern	State Legislation	Thank you for the comment. OCSE will take this into consideration.
58	State	UIFSA 319	This form and its purpose creates a significant concern for my state. By state statute, our statewide support enforcement system carries the official financial record for all family court cases in the state, both IV-D and nonIV-D. By law all payments must be processed through our SDU. Use of this form and process will make it very difficult for us to carry out our statutory responsibility to maintain a complete and accurate financial record, yet, because our order remains the controlling order in the 319(b) circumstance, we retain this responsibility. There is no provision in this process to inform the controlling order state of the ongoing financial transactions associated with the case. Under these circumstances we would not be able to provide a certified payment record without conducting a payment/account reconciliation that would depend on receipt of accurate and timely payment records from the state that is processing the payments. Keep in mind also that child support agencies are not the only entities that request payment records; case participants can and do request payment records from the official record keeper.	Comment - Concern	Statute	Thank you for the comment. UIFSA § 319 and 307(e) are currently the law in all jurisdictions. § 319(c) requires the support enforcement agency receiving payments on behalf of another state to furnish a certified statement by the custodian of the record of the amounts and dates of all payments received. The requested state certainly can ask the requesting state to provide on a regular basis the amounts and dates of all payments received so it can conform its own records.
59	State	UIFSA 319	Case summary section: recommend revising to "Total Support Amount/Frequency," this encompasses current, medical, and arrears payments, etc.	Change	Total Support Amount/ Frequencies	We disagree with the comment. This current field title "Support Amount/Frequency" is self explanatory and is meant to reflect what is required by the order.

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60	State	UIFSA 319	<p>#1 Section I. Action should also include a checkbox or statement for the requesting agency to indicate to the order-issuing/acknowledging state that once the requesting agency begins receiving the redirected payments, the requesting agency will provide "a certified statement by the custodian of the record of the amount and dates of all payments received" pursuant to Section 319(c). Doing so would help alleviate the order-issuing state's concerns regarding proper accounting for the support order and enforcing the support order based on that accounting where the order-issuing state (or party) has not registered or pursued registration of the order-issuing state's order in the requesting state or any other state.</p> <p>#2 Further, it is recommended that OCSE issue policy and/or pursue regulations that prescribe a frequency and timeframe for the requesting state to provide this information to the order-issuing state. Otherwise, there is a potential for the order-issuing state to take enforcement actions based on inaccurate/incorrect obligation balances and possibly be subject to lawsuits.</p>	Addition		<p>#1. We disagree with adding a checkbox to this form. A state has authority under the statute to request the payment record and can indicate the frequency. The statute is clear that this action must be done "upon request." An order-issuing state could make such a request under "other" on the acknowledgment. 2. OCSE appreciates the recommendation and will consider this for future guidance.</p>
61	State	UIFSA 319	<p>Instructions - Second page, Section I. Action, paragraph under "Requesting Agency:" consider using different language than "This form allows ..." such as "This form is used by a IV-D Agency to..." The intent of the term "allows" appears to be in the nature of procedure, however "allows" suggests the form provides an authority. Authority is given by UIFSA - not the form.</p>	Change		<p>We agree with this comment. We amended the instructions by deleting the sentence from the instructions.</p>
62	State	UIFSA 319	<p>We ask that consideration be given to rephrasing the second bullet on the Request to state, "The order-issuing state tribunal issued the controlling support order." If that change is adopted, the language in the Instructions, page 2, Section I, second box, should be changed to be consistent with the Request.</p>	Change		<p>We disagree with using the term "controlling" order, as the workgroup agreed to eliminate the term on the forms. However, as described below, we will revise the bullet for clarity. (Also, see comment 43.)</p> <p>On the form the second bullet now reads, "A tribunal in the requested state issued the support order; and"</p>
63	State	UIFSA 319	<p>"Facts Exist to Permit this Action list" Section - The bullet point "The order-issuing state tribunal issued the support order" is redundant. We suggest rewording this statement.</p>	Change		<p>We agree with the comment. See response to comment 62.</p>
64	State	UIFSA 319	<p>Instructions - Second page, Section I. Action, paragraph under "Requesting Agency:" the meaning of the forth sentence, "If you are requesting an arrears calculation from the order-issuing state, you will need to provide ..." is not clear and a purpose for the instruction should be included. The purpose given in the last sentence of the paragraph under Section III. Obligee information is a good example of describing the purpose.</p>	Clarification		<p>We agree with the comment. On the form for clarity, we have bulleted the instructions for items 1 and 2, and revised the instructions for item 1. The instruction now reads: "Check if the requesting agency seeks a certified arrears calculation (if available) or a payment record at the same time the order-issuing state agency returns a copy of the tribunal order or administrative notice redirecting the support payments and the conforming income withholding order or administrative notice of change of payee. If you are requesting an arrears calculation from the order-issuing state, you need to provide documentation of any payment that the custodial parent received that did not go through the order-issuing state's SDU."</p>

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65	State	UIFSA 319	I believe this document is saying that we are asking for a redirect of payments only. So, if we send this and the payments stop, we would still need to initiate anyway. If this is the case, I don't see where we would use this document frequently. Perhaps for Social Security Disability payments?	Comment - Concern		Thank you for the comment. OCSE agrees with the commenter's description that change of payment location does not give the requesting jurisdiction any authority over the obligor. It may be more effective to send an interstate IV-D case to the noncustodial parent's state instead of a 319 redirection request to the order-issuing state. 319 redirection, however, may be effective for obligors who have long standing employment.
66	State	UIFSA 319	There will also be situations where the case is open to IV-D services in the order-issuing state, it is being actively enforced there, and collections are being received (e.g., the order-issuing state's IV-D program is collecting assigned arrears through income withholding). The order-issuing state's IV-D program may not want to honor the Request and should not be forced to do so under these circumstances. While the Request might seem to be "properly made" from the requesting state's perspective, the order-issuing state would consider it to be inappropriate and detrimental to its interests. Neither the form nor the instructions provide any guidance on how to resolve the matter when the states are at an impasse.	Comment - Concern		Thank you for the comment. UIFSA §319(b) is currently the law in all jurisdictions and provides no basis to deny the request except where the required conditions do not exist. However, states are not required by federal or state law to request a change in payment location under § 319(b). OCSE agrees that states should consult with the order-issuing state IV-D agency in advance of using this provision to determine whether circumstances exist that make its use inadvisable or inappropriate.
67	State	UIFSA 319	In the heading to the form, there are criteria that set forth the facts that must exist to permit the Request. The first factor indicates the "Obligee receives IV-D services from the requesting agency." We understand this language to limit the Request to be made only on behalf of those individuals who are identified as the obligee in the controlling order, as opposed to any individual who desires to be the recipient of the support. For example, if the controlling order identifies Mom as the obligee and the child is now living with Aunt, who has applied for services in the requesting state, the requesting state would not be permitted to make this Request on behalf of Aunt to the order-issuing state, as Aunt is not the obligee identified in the controlling order.	Comment - Concern		We agree with the comment. OCSE agrees that § 319 (b) may only be used by the IV-D agency providing services to the obligee under the controlling support order. The term obligee is defined by state law.
68	State	UIFSA 319	The form is fine. Though as a purely commentary fashion we hate that this will be an option for States.	Comment - Concern		Thank you for the comment. UIFSA §319(b) is currently the law in all jurisdictions.
69	State	UIFSA 319	Instructions - Second page, Section IV. Obligor Information: The first sentence regarding "Check the appropriate space ..." is not necessary. The corresponding section on the form's page 1 does not have a space or selection to check.	Consistency		We agree with the comment. We revised the first sentence of the instructions to remove "check the appropriate space...."
70	State	UIFSA 319	In the Instructions, page 2, Section IV, the first sentence directs the individual to check the appropriate space to indicate whether the obligor is the parent; however, there is no corresponding field in Section IV of the Request to do so.	Consistency		We agree with the comment. See response to comment 69.
71	State	UIFSA 319	Instructions - Page 2, Section IV. Obligor Information: The instructions indicate that the appropriate space should be checked to indicate whether the obligor is the parent. However, the form does not include a space to check to indicate whether the obligor is the parent. It is recommended that this instruction be eliminated to align with the form.	Consistency		We agree with the comment. See response to comment 69.
72	State	UIFSA 319	Page 2 of the instructions for Section IV says "Check the appropriate space to indicate whether the obligor is the parent." We suggest removing that sentence because there is no such option to select in Section IV.	Consistency - I		We agree with the comment. See response to comment 69.

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73	State	UIFSA 319	Instructions - Page 3, Section I. Response: The instruction quotes the direction on the form for option 1_, but the quotation is incorrect. The instruction should read as follows: Provides a copy of the tribunal order or administrative notice changing the payment location of the support order ...	Consistency		We agree with the comment. We revised the instructions to directly quote the face of the form: we changed "our" to "the".
74	State	UIFSA 319	Instructions - Page 1, Heading/Caption: The instruction indicates that the tribunal number of the order-issuing state should be entered. However, the form does not include a space for the entering of this information. It is recommended that the instruction be modified to align with the form.	Consistency		We agree with the comment. We added a field to the form in the heading/caption to enter the tribunal number of the order-issuing state. Instructions were revised accordingly.
75	State	UIFSA 319	States will need time to implement system changes, policies, and procedures for issuing a conforming income withholding notice in response to a 319b request.	Implementation Timeframe		Thank you for the comment. UIFSA 2008 is state law developed by the Uniform Law Commission and enacted in all U.S. jurisdictions. No state IV-D agency is required to make a 319 request. States will have some time to implement systems changes to program for the new forms and OCSE is currently developing a plan to support states in this work.
76	State	Transmittal #3	Like instructions, formatting and selections.	Comment - Supportive		Thank you for your comment. OCSE plans to issue policy guidance regarding payment processing, including requests under section 319 of UIFSA.

0970-0085 - Attachment 2
Uniform Support Petition

Submitted By	Form	Comment	Category	Common	Comments/Notes
Organization	Uniform Support Petition	In Section II, Grounds Supporting the Remedy Sought in Section I, one of the options states, "A modification is appropriate because it has been 3 years since the last review or there has been a change in circumstances." This is a legal conclusion to be decided during a hearing. The grounds included in the petition should be limited to a statement of the facts as understood by petitioner. We recommend revising the statement to identify the factors that are relevant for the proceeding to modify.	Addition	3 year	We agree with this comment. We will change the check box to be two check boxes. The first will read "It has been 3 years (or the time frame permitted by the laws of the responding jurisdiction) since the last review or modification." The second will read "There has been a change in circumstances since the order was entered (Explain: _____)."
State	Uniform Support Petition	The draft form adds the following language regarding the time standard for review and adjustment: "A modification is appropriate because it has been 3 years since the last review or there has been a change in circumstances." Under 42 U.S.C. 666(a)(10), states are required to have procedures to review and, if appropriate, adjust child support orders every 3 years (or such shorter cycle as the State may determine) upon request by either parent. Our state has opted for a shorter, 2-year cycle. This new language could cause confusion when the case meets the time standard for review and adjustment in one tribunal but the case must be sent to another tribunal for modification. We suggest the language be changed to the following: "A modification is appropriate because it has been 3 years since the last review (or such lesser time as permitted by the laws of the responding tribunal) or there has been a change in circumstances."	Change	3 year	We agree with this comment. See response in Comment #1.
State	Uniform Support Petition	In Section II, Grounds Supporting the Remedy Sought in Section I, one of the options states, "A modification is appropriate because it has been 3 years since the last review or there has been a change in circumstances." We do not believe the form should state that a modification is appropriate. Whether modification is appropriate is a legal conclusion decided after notice to the other party and a hearing. The grounds should be limited to a statement of the facts as understood by petitioner. Neither mere passage of time nor a change in circumstances are sufficient in and of themselves for a modification. A change must be material, permanent and involuntary under Florida law and the law of many other states to entitle the petitioner to a modification. Recommendation: Revise the statement to read, "There has been a change in circumstances since the order was last reviewed or modified as follows _____." Revise the instructions to indicate the various factors that are or may be relevant in a proceeding to modify.	Change	3 year	We agree with this comment. See response in Comment #1.
State	Uniform Support Petition	The fact that the order was entered more than three years ago is listed as a basis for modification. That is a basis for review and adjustment, but is not, in and of itself, a substantial and continuing change of circumstance justifying a modification petition.	Comment - Concern	3 year	We agree with this comment. See response in Comment #1.
State	Uniform Support Petition	State recommends that "child care" be listed as a specific item for which states can request the establishment of an order.	Addition	Child Care	We disagree with this comment. This is uniformly handled within an order.
State	Uniform Support Petition	Form Section II. Grounds supporting remedy: Please clarify how/when the Petitioner would provide dates for when they last paid child support? The USP information sheet says changes were made allowing the petitioner to identify whether the petitioner or the respondent has not supported the child and when such support ceased.	Clarification	Child Support Last Paid	We disagree with this comment. This was included because the petitioner could be the obligor.

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Uniform Support Petition

State	Uniform Support Petition	Per the instructions, it was decided to remove a request for "Determination of Controlling Order and Arrears Reconciliation" because cases with multiple current support orders are rare. State has not found that to be the case.	Comment - Concern	Controlling Order	We disagree with this comment. The workgroup made the decision to remove this because most jurisdictions report that a petition for a Determination of Controlling Order is so infrequent that a checkbox is not needed. Training issue.
State	Uniform Support Petition	In the heading of the Petition, we believe there should be an option labeled "This request or information sent through CSENET". This option is included on the Transmittal 1. The Instructions to this form provide that CSENet transactions are the recommended method for sending information to another state.	Change	CSENet	We disagree with this comment. We have revised the instruction box to read: The following options are available for making IV-D requests and sending information on IV-D cases: 1. CSENet transactions are the recommended method for making requests or sending information to another state. If CSENet is not listed as an option on the form, then it cannot be used to convey any of the requests for information or IV-D requests provided on the form. Supporting documentation should be sent through EDE, whenever possible. If certified copies are needed, hard copies should also be sent by mail. Mail or fax may also be used for all documents when EDE is not available. 2. If CSENet transactions are not available in your state, EDE is the next preferred method for transmitting your request or information. Both your state and the receiving state must be using the EDE application to use this communication method. 3. If the EDE application is not available in your state or the receiving state, then mail or fax must be used to communicate your request.
State	Uniform Support Petition	Under State Rules, to obtain a default order for past support, we must allege the time period for which child support is sought and that the amount will be calculated by retroactive application of the State Child Support Guidelines. The USP does not make this allegation.	Addition	Designate period for retroactive child support	We agree with this comment. The following checkbox was added to Section I Action for the person completing the form to indicate a date from which retroactive support is sought: [] Retroactive child support since _____ (date) We will also reformat Section II Grounds for Relief. The instructions already note that the availability of retroactive support will be based on the law of the responding jurisdiction.

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Uniform Support Petition

State	Uniform Support Petition	The Uniform Support Petition (USP) has a place to request retroactive child support, but no period is designated. There is a place that says that the party has not provided support since or for a specified time period. This could be construed as an allegation of a specific time period. This information is more fully set forth in the General Testimony. The GT says that it should not be filed in a public access file. That leads to the question of whether the obligor will have adequate notice of what is being requested.	Question	Designate period for retroactive child support	We agree with this comment. See response in Comment # 9. Although the GT should not be filed in a public access file, the obligor will have adequate notice because of service of the petition and the testimony, if the testimony is to be admitted as evidence.
State	General	The retroactive instructions on Page 1 of the Petition are unclear. The form would be clearer by providing whether it is only to be used when requesting back support.	Change	Retroactive	We agree with this comment. See response in Comment #9.
State	Uniform Support Petition	The untitled section between Petitioner/Respondent information and Section 1 - The wording in this section "the children involved in this action are" and below it "provide each child(s) full legal name" seems redundant. We suggest the following statement: The full legal name(s) (first, middle, last) of the child(ren) involved in this action is/are:	Change	first, middle, last	We agree with this comment. We will make this language consistent with the other forms.
State	Uniform Support Petition	Was the FIPS reference omitted intentionally?	Question	Location Code	Thank you for your comment. The FIPS or Location codes are not used in documents intended for the tribunal.
State	Uniform Support Petition	Was the Location Code omitted from the caption intentionally?	Question	Location Code	Thank you for your comment. See response in Comment # 13.
State	Uniform Support Petition	Under Section IV of the Petition, we ask that consideration be given to labeling the second signature line "Signature of petitioner's private attorney/bar number (if applicable)".	Change	Signatures	We agree with this comment. The word "private" will be added before attorney in the signature line and the instructions.
State	Uniform Support Petition	Change signature field to: "Signature of Petitioner/Respondent" as obligor sometimes completes this form to request modification in the other state	Change	Signatures	We disagree with this comment. The USP will always be signed by the person seeking relief or the IV-D Representative. The designation of petitioner or respondent is a state system or state pleading issue. We added check boxes to identify the petitioner and respondent as the obligee or obligor to help with clarification. Training Issue
State	Uniform Support Petition	State asserts that the proposed Uniform Support Petition and the Instructions for the Uniform Support Petition incorrectly state: "The petition must be signed under penalty of perjury." State does not believe this is the intent of UIFSA 2008. Therefore, State recommends removing all verification language from Section IV of these documents.	Comment - Concern	Signatures	We disagree with the recommendation to remove all verification language. UIFSA requires that the information be submitted under penalty of perjury in order to be admissible as evidence. UIFSA no longer requires notarization so the form does not require signing before a notary.

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Uniform Support Petition

State	Uniform Support Petition	In section I. Action, under the second box, Establishment of an order for, there is a box and an option to select "Spousal support (Non IV-D only)". In the Action section of the instructions form (page 2) under "Retroactive child support," there is a box explaining that not all states have authority to establish child support awards covering a prior period. It may be helpful to list something similar under the instructions for the spousal support options since not all states have the authority to establish spousal support orders (even if they are non-IV-D).	Addition - I	Spousal Support	We disagree with this comment. The instructions are accurate and adequate. The instructions state: Check "Spousal support" to request establishment of a spousal support order. NOTE: Do not check this item in a IV-D case. Establishment of spousal support is not a IV-D child support agency function, and a IV-D child support agency will not assist.
Organization	Uniform Support Petition	Instructions I Action - Check "Spousal support" to request establishment of a spousal support order. Do not check this item in a IV- D case; establishment of spousal support is not a IV-D function. Child Support Enforcement Agencies will not be able to assist. It may be helpful to specify that "Child Support Enforcement Agencies will not be able to assist," because this form is likely to be filled out by a lay person or private attorney unfamiliar with the term "IV-D".	Change - I	Spousal Support	We agree with this comment. In the Instructions we will clarify that a IV-D child support agency will not assist with the establishment of spousal support. See response in Comment # 18 for updated language.
Organization	Uniform Support Petition	I Action - establish [] spousal support (this is a non IV-D function only . <u>A IV-D agency will not assist</u>). This should be more instructive for private attorneys so as to prevent frustration when the IV-D agency cannot perform the request.	Change Change - I	Spousal Support	We agree with the comment. We are addressing this in the instructions rather than on the form itself. In the Instructions we will clarify that a IV-D child support agency will not assist with the establishment of spousal support. See response in Comment # 18 for updated language.
State	Uniform Support Petition	Should the option to request an Order for Spousal Support Only be on this form since there is no IV-D requirement for state programs to provide spousal support only services? Does the inclusion on the form imply that this type of service is available?	Question	Spousal Support	We disagree with this comment. The relief is on the Petition because private attorneys may also use this form. See response in Comment # 18 for updated language.
State	Uniform Support Petition	The header that is on the Uniform Support Petition is excellent in that it includes whether the "status" of the petitioner is either the obligor or the obligee. It is our opinion that some consideration should be given to making this change standard across all of the UIFSA documents.	Consistency	Standard Header	We agree with this comment. Where appropriate we have included this distinction on other forms.
State	Uniform Support Petition	Section III. Other Pertinent Information - We would like additional wording added to: Birth certificate/record of the child and supporting documentation. This would include documents such as paternity affidavits, proof of marriage, court order, etc. If we have the birth certificate/record and the father's name is listed, we need to know why the father's name was added. Did he sign a paternity affidavit or were the parties married? We need that specific information.	Addition		We disagree with this comment. The information is captured on the Child Support Agency Confidential Information Form. Training needed
State	Uniform Support Petition	Instructions Page 3: Section II, 4th bullet: Include the instruction to provide explanation when the "additional grounds" box is checked.	Addition - I		We agree with this comment. We revised the instructions to include "Provide information about the basis for the remedy sought."

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Uniform Support Petition

State	Uniform Support Petition	Instruction Page 3: Section II- header wording should match header on form, I would recommend the header and instruction read: "Grounds for Supporting the Remedy Sought in Section I."	Consistency		We agree with this comment. The header in the instructions will be changed to match the form "Grounds Supporting the Remedy Sought in Section I:".
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General Comments

#	Submitted By	Form	Comment	Category	Common	Comments/Notes
1	State	General	The instructions for most forms say to select whether the person is an obligor or obligee. Most forms do not provide instructions about what to select if paternity has not been established. We suggest adding an option to the forms to identify if the person is a putative/alleged father.	Addition	Alleged Father	We agree with the comment. We have added a definition for obligor to the instructions of the General Testimony.
2	State	General	State suggests that the check box in front of the wording "PII Form Attached" be removed from each proposed intergovernmental form. The check box may cause a state to believe that attaching a PII form is optional. However, because the PII form contains the personal information needed for each petitioner, respondent, caretaker, and child, the PII form is not optional and will need to be included with most documents that are being sent to another state, even if it is to be filed separately.	Comment - Concern	Attach PII	We agree with this comment. Note that the proposed PII form has been changed. There are now two new forms: the Child Support Agency Confidential Information form and the Personal Information for UIFSA 311 form. The other intergovernmental forms and their instructions have been revised accordingly. If attachment of the form is mandatory, there is no longer a checkbox. Instead, the form includes a directive.
3	State	General	Overall, each instruction could be made clearer. Please clarify that a PII form will not be attached when there is also a nondisclosure finding/affidavit. The petition and its attachments are generally served on the individual parties so serving these documents on individual parties when nondisclosure has been requested or ordered due to family violence would definitely be a violation of privacy.	Comment - Concern	Attach PII	We agree with the comment. Whenever a nondisclosure finding/affidavit exists then neither the Child Support Agency Confidential Information Form or the Personal Information Form for UIFSA 311 should be served to the other party. We have added the following statement to the forms: "UIFSA requires that the petition or accompanying documents include certain identifying information regarding the parties and child(ren) (e.g., residential address, social security number) unless a party alleges in an affidavit or a pleading under oath that the health, safety, or liberty of a party or child would be jeopardized by disclosure of such information. In that event, the information must be sealed."
4	State	General	State requests OCSE use the proposed form revisions as an opportunity to provide guidance on the appropriate forms to be used in multiple caretaker cases. My state, like many states, has the ability to administratively redirect support from a parent entitled to support order to the state or another caretaker. State believes there is vast inconsistencies in how states handle this common case scenario and what OCSE forms are needed to register and enforce an order for parent A, but administratively payable to caretaker B in an initiating state.	Statement	Caretakers	Thank you for your comment. We do not believe that the forms are the appropriate vehicle for providing policy guidance on payment processing issues in multiple caretaker cases.
5	State	General	In the instructions and throughout all of the forms reference is made to the "cause number", this is confusing. Should it be case number? If not, perhaps add some instruction as to what a cause number is.	Change - I	Cause Number	We agree with this comment. The cause number should be case number. We will change all the forms to make this consistent.

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General Comments

6	State	General	Many of the instructions indicate that CSENet transactions are the recommended method for making requests or sending information to another state. However, the proposed forms do not align with the CSENet process. For example, the proposed forms which include a list of actions to be taken (e.g., Child Support Enforcement [CSE] Transmittal #1 - Initial Request, Section I. Action) no longer describe the actions using terms which align with the titles for the corresponding CSENet transactions. Further, there does not appear to be a singular CSENet transaction for the proposed action "Change payee and enforce." Although the Child Support Enforcement Network CSENET Interface Guidance Document (IGD), Appendix B, Valid Transactions Table, contains a Change of Payee transaction, it is a Managing State Cases transaction that does not contain an enforcement request. State suggests that ACF provide a document which shows the links between each listed action and the corresponding CSENet transaction(s), check box by check box, to facilitate the systematic mapping of an action to the appropriate CSENet transaction. It is recommended that consideration be given to modifying the titles of the CSENet transactions to more closely match the descriptions of the actions listed on the proposed forms. Importantly, the CSENet transactions should be reviewed to ensure that the existing transactions accommodate all of the proposed actions listed on the forms.	Comment - Concern	CSENet	A CSENet transaction is the recommended method. We have reworded the text box to read: The following options are available for making IV-D requests and sending information on IV-D cases: 1. CSENet transactions are the recommended method for making requests or sending information to another state. If CSENet is not listed as an option on the form, then it cannot be used to convey any of the requests for information or IV-D requests provided on the form. Supporting documentation should be sent through EDE, whenever possible. If certified copies are needed, hard copies should also be sent by mail. Mail or fax may also be used for all documents when EDE is not available. 2. If CSENet transactions are not available in your state, EDE is the next preferred method for transmitting your request or information. Both your state and the receiving state must be using the EDE application to use this communication method. 3. If the EDE application is not available in your state or the receiving state, then mail or fax must be used to communicate your request.
7	State	General	The changes on many of these forms will require changes to existing CSENet transactions. We suggest OCSE allow time for states to implement both CSENet and form changes at the same time.	Implementation Timeframe	CSENet	Thank you for your comment. We are looking at the changes that will be required for CSENet. The Use of EDE would be an alternative until CSENet changes can be made.
8	Organization	General	An Acknowledgment of Receipt: Workers would like an acknowledgment of receipt between jurisdictions in UIFSA cases. One suggestion is to use the existing portal (or create one) that allows jurisdictions to view a receipt check list posted by. Although CSENet electronically provides acknowledgments, and acknowledgments are required to be sent on transmittal #1's, workers reported that they did not always receive acknowledgment of all that was sent. One suggestion is to use the existing portal (or create new one) that allows jurisdictions to view a receipt check list of received documents and key information posted by the responding state so that the initiating state can verify without having to make contact with a person.	New Form	CSENet	Thank you for your comment. We realize this is an existing issue. We have put a note in the header to advise the receiving jurisdiction that the form was also sent via either CSENet or EDE. This is a heads up for the receiving jurisdiction that they need to check for documents that may have been sent electronically.
9	Organization	General	Distribution of Support: Workers stated that when the Order state does not have an open IV-D case, the state where CP resides should be the state whose SDU receives and distributes support .	Comment - Concern	Distribution	Thank you for your comment. This is a policy question and not a forms question. We have referred the question to the policy area responsible for this.
10	State	General	For all forms, we suggest changing "(first, middle, last)" to (first, middle, last, suffix)." The suffix helps ensure that states are pursuing the right person.	Change	first, middle, last	We agree with the comment. We will change all forms to be consistent with this language (first, middle, last, suffix).

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General Comments

11	Organization	General	Transmittals 1 & 2 and General Testimony forms: workers commented that these were too long, complicated and redundant. There were also comments that there are jurisdictions that are not using the same version	Comment - Concern	Form Length	We agree with the comment. All states should be using the approved forms without modification.
12	State	General	For the re-named forms, the new names are not an improvement.	Comment - Concern	Form Names	We disagree with this comment. The new names have been well received and make sense.
13	Organization	General	Incomplete Referrals: Workers would like for the process of making referrals to include a courtesy step when there is missing information. Specifically, the responding state (RS) would send a letter to the initiating state (IS) that allows for the IS to send the necessary information within X business days before the RS would close the referral. Another suggestion recommended the extra time be sixty (60) days.	Addition	Incomplete Referrals	Thank you for your comment. This is a policy question and not a forms question. We have referred the question to the policy area responsible for this.
14	State	General	Rather than providing all the instructions at the end of each form, include more instructions on form itself through references to website addresses and the Intergovernmental Reference Guide as appropriate.	Addition	Instructions	We disagree with this comment. This was discussed in the forms work group and the decision was not to do this since it would make the forms volatile. Websites can change and having the instructions all in one place facilitates future form changes.
15	State	General	A brief version of pertinent instructions could be provided when appropriate in the form itself in order to assist the completion of the form. Example: In the General Testimony, the person completing the form is asked to reply: [] Yes [] No (If yes, complete the information below). Inserting brief instructions should make completing the form less cumbersome. Using the same example above, the form could offer: [] Yes [] No (If yes, complete the information below).	Change - I Consistency	Instructions	We disagree with this comment. We have included brief instructions within the form text as much as we thought necessary.
16	State	General	Language included at the top of all forms says "The information in this form is legally privileged and confidential. If you are not the intended recipient, you are hereby notified that any disclosure, distribution, or copying of this communication or its contents is strictly prohibited." Many of these forms could potentially be filed in the court file. Once filed in a public court file, the form loses any confidential or legally privileged status it may have. This language could confuse clerks of court, who might think they have to seal the document or that they are prohibited from even copying the document. Because it may be confusing or misleading, we recommend removing this language from any forms that may be filed in a public court file. This includes the General Testimony, Uniform Support Petition, and Declaration in Support of Establishing Parentage.	Change	Legally Privileged and Confidential	We agree with this comment. We have made changes to the language at the top of each form making them contain the appropriate language for the form and making the language consistent across forms.
17	Foreign County	General	A notice has been added to the top of each of these forms that states: "The information in this form is legally privileged and confidential. If you are not the intended recipient, you are hereby notified that any disclosure, distribution, or copying of this communication and its contents is strictly prohibited". With very limited exceptions prescribed by provincial/territorial law or court order, provincial/territorial court records are public records. Since these court records are public, provinces and territories would be unable to process the incoming UIFSA applications in compliance with the notices on the form.	Comment - Concern	Legally Privileged and Confidential	We agree with this comment. We have made changes to the language at the top of each form making them contain the appropriate language for the form and making the language consistent across forms.

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18	State	General	<p>The proposed forms replace "FIPS Code" with "Location Code." Many of the proposed forms, however, are used exclusively by State IV-D agencies, for which reference to the Federal Information Processing Standards code is appropriate. In addition, the names of several data fields contained within the CSENET IGD, Appendix A, Data Dictionary, include "FIPS Code." Examples of the names of such data fields include Locai-FIPS-County, Order-FIPS-State, and Other-FIPS-Sub. State recommends continuation of the "FIPS Code" identifier for forms used exclusively by State IV-D agencies. Note that this is a discrete yet significant example of a form change which will have broad impact upon training materials and system documentation.</p>	Comment - Concern Consistency	Location Code	<p>We disagree with this comment. FIPS codes are not inclusive of tribes. A locator code is more universal and is the official term. Training issue.</p>
19	State	General	<p>Instructions - The Nondisclosure Finding/Affidavit section says that a state can provide the IV-D agency's address as a substitute address for the protected party. In order to clarify that state's must accept this substituted address, we suggest changing the language in this section to the following: "Nondisclosure Finding/Affidavit- If there is a finding prohibiting disclosure of a party's or child(ren)'s address/identifying information or an affidavit alleging that disclosure of such information would result in risk of harm, check the box for "Nondisclosure Finding/Affidavit" and attach a copy of the finding/affidavit in accordance with section 312 of UIFSA. If there is a finding/affidavit prohibiting disclosure, you may provide the address of the IV-D agency as a substitute address for the protected party. States cannot reject a Transmittal 1 because a IV-D agency address is substituted for the protected party."</p>	Change	Nondisclosure	<p>We partially agree with the comment. There seems to be confusion regarding UIFSA Section 312. Some of the forms have been updated to include the following information on the form. THIS FORM CONTAINS SENSITIVE INFORMATION – DO NOT FILE THIS FORM IN A PUBLIC ACCESS FILE. The information on this form is filed with the petition or pleading and may be disclosed to the parties in the case, unless accompanied by a nondisclosure finding/affidavit.</p> <p>The Nondisclosure Finding/Affidavit language has been updated as follows: If there is a finding prohibiting disclosure of a party's or child(ren)'s address/identifying information or an affidavit alleging that disclosure of such information would result in risk of harm, check the box for "Nondisclosure Finding/Affidavit attached" and attach a copy of the finding/affidavit in accordance with section 312 of UIFSA. If there is a finding/affidavit prohibiting disclosure, the information must be sealed and may not be disclosed to the other party or the public. You may provide the address of the IV-D agency as a substitute address for the protected party. The text boxes associated with a Nondisclosure Finding/Affidavit are: UIFSA requires that the petition or accompanying documents include certain identifying information regarding the parties and child(ren) (e.g., residential address, social security number) unless a party alleges in an affidavit or a pleading under oath that the health, safety, or liberty of a party or child would be jeopardized by disclosure of such information. In that event, the information must be sealed.</p> <p>If a jurisdiction has reason to believe that information should not be released because of safety concerns, it should ensure that there is a nondisclosure finding or an allegation in an affidavit or the pleading that disclosure of identity information would result in a risk of harm, as provided under section 312 of UIFSA. In addition to identifying information included on this form, it may be appropriate to submit certain financial information under seal.</p>

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20	State	General	There is an inconsistency of like word throughout all the documents; e.g., Nondisclosure finding/affidavit on the top of the PII (page 1) and in the instructions of that form (page 4) shows Nondisclosure Findings/Affidavit. Like words throughout all of the documents should be consistent in the way they display.	Consistency	Nondisclosure	We agree with the comment. We will make the terms consistent across the forms.
21	Organization	General	Federal Non-Disclosure Form: Workers asked that OCSE standardize this form, both for administrative and judicial use, for all. It would standardize the definition of an ex parte order and would have all jurisdictions recognize it.	New Form	Nondisclosure	We disagree with this comment. The issuance of ex parte orders in family violence cases is specific to state law and rules. Training Issue
22	State	General	Ways to minimize the burden information to be collected; There are a number of methods to minimize the burden of information to be collected. A customer interview should be conducted thoroughly and early in the life cycle of the case. A standardized interview sheet which addresses all information on the proposed forms is essential. By removing the notary section on some of the forms, the forms committee reduces the burden on program staff. Direct access to court orders and documents is also important so that questions of jurisdiction can be answered early and so payment information in conjunction with court order information can be recorded accurately. In addition, effective communication between the IV-A agency and I-VE agency with the IV-D agency is key is minimizing the burden of information to be collected. Functioning interfaces between the systems which can transfer accurate and complete data for use of child support business would reduce the information gathering and other manual labor to prepare forms. Last, use of the proposed form changes themselves should reduce the burden of data collected as the forms streamline information gathering and remove data fields no longer or rarely used.	Burden	Notary	Thank you for your comment. These are best practices and not an issue for us to address.
23	Foreign County	General	Current UIFSA forms are sworn before a notary public. This satisfies the requirements of provincial/territorial Evidence Acts for admissibility of evidence taken outside of the jurisdiction. The explanatory documents relating to the draft amended UIFSA forms indicate that UIFSA 2008 (s. 316) no longer requires verification and that it is sufficient that the documents be signed "under penalty of perjury", and therefore the reference to a notary public has been removed. We understand that with this proposed change the declaration would likely be signed by the petitioner or caseworker only and would not reflect that it had been made before any authority. If the declaration is no longer verified by an authority it would not be in compliance with the current requirements of provincial/territorial Evidence Acts and ISO legislation (which include provisions that specify which elements of an ISO application must be sworn). Note: • The General Testimony is attached to and incorporated in the Uniform Support Petition. • The "Declaration in Support of Establishing Parentage" form (where applicable) is attached and incorporated by reference into the General Testimony. • If the Uniform Support Petition is declared before a notary public (or any other competent authority that is included in the applicable PT Evidence Act provision), this would address the problem since the other forms that are attached to and incorporated into the Petition would be included in this declaration.	Comment - Concern	Notary	Thank you for your comment. These forms have been developed, primarily for interstate cases, in compliance with UIFSA. OCSE will continue to work with foreign reciprocating countries (FRCs) regarding country specific forms.

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24	Organization	General	Court Orders: One worker suggested that UIFSA paternity, establishment, and modification cases use a uniform Order, just like there is a uniform petition. The discussion around this topic was very lively. Workers commented how hard it is to read Orders from other jurisdictions and to find the correct information to put into the automated systems. They commented that this would lead to more efficient processing, less errors and fewer questions between the jurisdictions. In anticipation of pushback from the Courts, an alternative would be to create a uniform summary page that the responding state would prepare and include with the Order to the initiating state that would state the necessary elements of the Order: party names and identifiers, the support amount, frequency, commencement date, retroactive judgments, and state debt judgments, etc.	New Form	Orders	Thank you for your comment. At this time there are no plans to develop a uniform order. State law and court rules usually govern the content of support orders.
25	State	General	In general, state would like to have UIFSA forms that are easy to understand. Forms that are written in plain English (no legalese) and at the lowest reading level possible. This would make the forms easier for our customers to understand, this is particularly true for the forms intended to be completed by the customer.	Comment - Concern	Plain Language	Thank you for your comment. We have implemented this as best we can, but due to the legal nature of the forms we are not able to completely do this.
26	State	General	In general, these forms are cramped and do not have sufficient space to be completed by hand, and these forms are often hand-written, even by agencies; in the case of the General Testimony, agencies routinely give the form to the participant to be completed by hand.	Comment - Concern	Space	Thank you for your comment. We have added as much white space as possible to the forms.
27	State	General	State notices numerous accessibility and alignment issues pursuant to Section 508 of the Rehabilitation Act and the Americans with Disabilities Act. For instance, Section 2 of the Uniform Support Petition could be made more user friendly and accessible by simplifying the options such as the items to select and creating more space. Furthermore, the General Testimony would be easier to read and leave a response if an answer blank was placed behind a question mark instead of in front of the question mark.	Comment - Concern	Space	Thank you for your comment. We have to adhere to 508 compliance and all our forms are reviewed for 508 compliance.
28	State	General	State recommends removing all references in the heading section as to whether the petitioner has received or is receiving TANF assistance. State believes that this section is not relevant to filing an action for establishment, modification, or enforcement under UIFSA. This information can only be shared on documents that are communicated solely between the Title IV-D agencies, such as the Transmittals. State also recommends removing the following wording, "I told welfare officials that the respondent is the other parent of this child" from Section 2b on page 2 of the Declaration. In State, it is a Class A misdemeanor to reveal that an individual is receiving services from the Health and Human Services agency. The State IV-D program does not even reveal this information to judges during child support hearings.	Change	TANF	Thank you for your comment. Based on this and other comments received, all statements starting with "I told welfare officials.." have been removed from the forms. We have retained reference to TANF in the header of some forms because many other states have indicated that the information regarding case type is relevant.
29	State	General	Many states currently do not fully fill out the UIFSA forms, leaving requested and required information blank. Some states have changed the look of the forms and do not include all of the information from the federal UIFSA forms. Will there be some type of requirement that the forms not be changed by individual states and that all information and questions be fully filled out	Clarification	Uniform Forms	Thank you for your comment. These forms are federally approved forms and states are required by law to use the forms as published. To the extent a state has the requested information, it should be completing the forms fully.

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30	State	General	State is requesting the federal forms be made available in Word format. This would benefit the end users who contribute to the success of the child support programs. These users represent a wide range of ages and diverse backgrounds. Word based formats are the most user friendly and familiar format for form production, both manually and via automated platforms among these users. Word versions allow for easier programming and provide ease of function and editing ability to the user. The federal forms are currently distributed as PDFs which can be difficult to manipulate with the available tools. They also present problems due to the differences in the levels of computer literacy among users. The time required to convert or recreate PDFs into the more user friendly Word format is a significant impact to program staff responsible for form development and maintenance. It is our goal to provide users with forms that can be easily produced and edited so that productivity can be maximized. Consideration of this comment is appreciated.	Comment - Concern	Word Format	Thank you for your comment. Unfortunately word format enables the states to change the forms. We have given states permission to use the word forms under very specific circumstances. If a state needs the form in word format they should contact their state program specialist for approval. Training Issue
31	State	General	State also suggests that "Yes and No" be reversed consistently throughout all of the forms, as shown below: Ex: [] No [] Yes (If yes, complete the information below). This will help avoid confusion and provide consistency in formatting.	Change Consistency	Yes and No Response	Thank you for your comment. The workgroup decided against this to provide consistency across the forms.
32	State	General	To facilitate efficient and effective communication, forms should always contain a field for the printed name in association with an adjacent signature field. For example, it is recommended that fields for the printed names of the IV-D Representative and the Petitioner's Attorney be included on the Uniform Support Petition.	Addition		We agree with this comment. printed name fields have been added to the Letter of Transmittal Requesting Registration and the Uniform Support Petition which were the two forms that did not have the printed name.
33	State	General	The addition of the label for SSN / ITINS and the definition for the ITINS use should be included as more and more jurisdictions are able to withhold and attach wages based on this identifier.	Addition		We disagree with this comment. An ITIN is a temporary id number. OCSE has received conflicting information considering we only received one comment we believe more information and justification is needed before being added to the Intergovernmental Forms.
34	State	General	Forms should be formatted to the extent that states will need to support data capture. For example, entry lines should be reformatted to be displayed as data fields. State notes and appreciates the inclusion of data fields on the Personal Identifiable (PII) Form as well as sections of the General Testimony and suggests that similar changes would be appropriate on other forms. For example, the addition of data fields for the initiating jurisdiction information (i.e., location code, IV-D case identifier, and tribunal number) on the Child Support Enforcement Transmittal #1 - Initial Request would facilitate more efficient data entry and processing.	Addition		Thank you for your comment. Reference to the "Initiating IV-D Case Identifier" has been removed from the top of all subsequent form pages.

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35	State	General	All forms now show "Initiating IV-D Case Identifier" on the top of the 2nd and each subsequent page, however there is no instruction for this field and insufficient length after the words to comply.	Addition - I		Thank you for your comment. We have not revised the instruction language as suggested because the form is meant to track the language in Section 312 of UIFSA. The personally identifiable information has, for the most part, been moved to the PERSONAL INFORMATION FORM FOR UIFSA § 311 and CHILD SUPPORT AGENCY CONFIDENTIAL INFORMATION FORM. This allows the state flexibility in protecting confidential information under UIFSA or other court rule.
36	State	General	<p>The instructions for all forms other than the Transmittal# 1-Acknowledgement and the Notice of Determination of Controlling Order contain the following language: "UIFSA requires that petitions include certain identifying information regarding the parties and chi/d(ren) (e.g., residential address, social security number) unless a party alleges in an affidavit or a pleading under oath that the health, safety, or liberty of a party or child would be jeopardized by disclosure of such information. In that event, the information must be sealed. In some states a tribunal may have authority to make a nondisclosure finding. If the initiating jurisdiction has reason to believe that information should not be released because of safety concerns, it should ensure that there is a nondisclosure finding or an allegation in an affidavit or the pleading that disclosure of identity information would result in a risk of harm, as provided under section 312 of UIFSA. In addition to identifying information included on this form, it may be appropriate to submit certain financial information under seal." We suggest adding additional language to these instructions to clarify that states may have other means to protect the information under state law. This is particularly applicable for states that can file court documents electronically. We suggest changing this language to the following: "UIFSA requires that petitions include certain identifying information regarding the parties and child(ren) (e.g., residential address, social security number) unless a party alleges in an affidavit or a pleading under oath that the health, safety, or liberty of a party or child would be jeopardized by disclosure of such information. In that event, the information must be sealed or restricted in another manner allowed by state law. In some states a tribunal may have authority to make a nondisclosure finding. If the initiating jurisdiction has reason to believe that information should not be released because of safety concerns, it should ensure that there is a nondisclosure finding or an allegation in an affidavit or the pleading that disclosure of identity information would result in a risk of harm, as provided under section 312 of UIFSA. In addition to identifying information included on this form, it may be appropriate to submit certain financial information under seal or other restrictions as allowed by state law."</p>	Change		Thank you for your comment. All of the instructions for the forms that request a case worker telephone number have been updated to request a direct telephone number.

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37	State	General	Require IV-D agency case workers to provide direct phone/fax numbers in transmittals forms. DOR recommends that the instructions to the Transmittal #1, 2, and 3 forms state explicitly that direct emails, phone and fax numbers must be provided when completing these forms. While the Transmittal forms do contain fields to provide contact information for the initiating agency's designated contact person, our experience is that those fields are often filled with a phone number intended for general public use, such as a customer service line. The ability to contact the appropriate staff person in the other state greatly minimizes delays and allows the case to be processed more efficiently and timely.	Change - I		Thank you for your comment. That is a state decision.
38	State	General	To reduce errors in the collection and recording of data by states, no information (except for signatures) entered on the forms should be handwritten.	Comment - Concern		We agree with the comment. All of the forms should be consistent. The forms have been updated to use the term "Locator Code" where that field is included.
39	State	General	Instructions and forms switch between Locator codes & Location codes, should be consistent throughout the forms.	Consistency		We agree with the comment. In the Encryption Requirement section, all forms and instructions will consistently refer to "e-mails".
40	State	General	In the Encryption Requirements: section "email" is listed as "emails", everywhere else it is "e-mail". Can this be referenced the same way throughout all of the forms to maintain consistency?	Consistency		We agree with the comment. We will review the forms for consistency.
41	State	General	The use of colons in boxes or in other areas where something needs to be completed appears to be very inconsistent throughout all of the documents. Some boxes or numbers within a section have a colon and some do not.	Consistency		Thank you for your comment. We will review the forms for consistency.
42	State	General	In looking at the forms, there appears to be extra spaces between words (mid-sentence) that need to be deleted.	Consistency		Thank you for your comment. We will review the forms for consistency.
43	State	General	In the Heading/Caption sections of the forms, where multiple options are listed, the punctuation appears to be inconsistent.	Consistency		Thank you for your comment. We will review the forms for consistency.
44	State	General	We note that it is important to remain consistent in terminology throughout the forms. Thus, in the individual form commentary, there were a few inconsistencies we noted.	Consistency		Thank you for your comment. We will review the forms for consistency.
45	State	General	In the Instructions, page 1, last italicized text box, the labels "IV-D case identifier" and "tribunal number" are not consistent with the corresponding labels on the form, which include "Responding IV-D Case Identifier", "Initiating IV-D Case Identifier", "Responding Tribunal Number", and "Initiating Tribunal Number". For clarity purposes, we believe the labels used in the instructions should be verbatim with the labels used in the form. This is a recurring issue throughout the packet of forms and instructions. In our comments that follow, we have identified several other forms and instructions where this inconsistency occurs.	Consistency		Thank you for your comment. We will review the forms for consistency.
46	State	General	Instructions-final pages should include the blurbs for encryption requirements and the paperwork reduction act. All forms should have these blurbs in the same type face and size for consistency and be formatted to fit in the margins of the page.	Consistency - I		Thank you for your comment. We have had discussions about making the forms a fillable PDF, but we have not made that commitment at this time.
47	State	General	Can State receive the new UIFSA forms set up as fillable PDFs.	Fillable PDFs		Thank you for your comment. See response to comment #47.

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48	State	General	State requests OCSE develop and make available fillable PDFs for each form that can be accessed through the OCSE website.	Fillable PDFs		Thank you for your comment. We realize that it will take time to make adjustments to state systems and will consider this when we announce the new forms. We are also working on technical assistance for the states with our Division of State and Tribal Systems.
49	State	General	The changes to these forms are significant. For states that have the forms interwoven through their system, it could easily take six months to a year to implement these changes. We suggest that states be allowed at least a year to implement the changes.	Implementation Timeframe		Thank you for your comment. We realize that it will take time to make adjustments to state systems and will consider this when we announce the new forms. We are also working on technical assistance for the states with our Division of State and Tribal Systems.
50	State	General	It is critical to note that implementation of the revised intergovernmental forms will necessitate changes to associated automated processes and procedures. For example, in State the revisions to the forms will require that modifications be made to the corresponding assessment screens and their underlying processes. This involves development work and testing, which is a time-intensive process. In addition, ancillary modifications to system documentation and staff training materials must be coordinated with the form changes. Therefore, State strenuously suggests a time frame for implementation of no less than one year and preferably eighteen months.	Implementation Timeframe		Thank you for your comment. We realize that it will take time to make adjustments to state systems and will consider this when we announce the new forms. We are also working on technical assistance for the states with our Division of State and Tribal Systems.
51	State	General	In addition to the above comments, the State is in the midst of a very difficult and time consuming document conversion project. As a result, we feel it could take up to 12 months to get changes processed.	Implementation Timeframe		Thank you for your comment. We realize that it will take time to make adjustments to state systems and will consider this when we announce the new forms. We are also working on technical assistance for the states with our Division of State and Tribal Systems.
52	State	General	State request a full year for implementation of any new OCSE forms. The state certified system is dated and transitioning all intergovernmental forms and creating three new forms will require time for programing and implementation.	Implementation Timeframe		Thank you for your comment. We realize that it will take time to make adjustments to state systems and will consider this when we announce the new forms. We are also working on technical assistance for the states with our Division of State and Tribal Systems.
53	State	General	We request that ample time be given for states to implement these new and updated UIFSA forms.State would require a minimum of 6 months but a year would be preferable to make the required system and programming updates necessary to implement these forms changes.	Implementation Timeframe		Thank you for your comment. We realize that it will take time to make adjustments to state systems and will consider this when we announce the new forms. We are also working on technical assistance for the states with our Division of State and Tribal Systems.

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54	State	General	<p>We have analyzed the level of effort and time needed to implement the new and revised forms as proposed. To implement the forms on the IV-D automated system, we estimate it will take 2104 hours for development/revision of functional and technical specifications, coding, configuration, and testing. We estimate an additional 1104 hours needed to develop/modify/deliver procedures and training. We estimate it will take 18 months to complete the work. Recommendation: Allow states 18 months to implement these changes</p>	Implementation Timeframe		<p>Thank you for your comment. We realize that it will take time to make adjustments to state systems and will consider this when we announce the new forms. We are also working on technical assistance for the states with our Division of State and Tribal Systems.</p>
55	State	General	<p>The accuracy of the agency's estimate of the burden of the proposed collection of information; State obtained a rough order of magnitude on proposed changes from our agency's Information Technology Division. It is estimated to take 9,150 hours, over a 1 ½-2 year period, to implement the proposed forms. Implementing the new forms will require the most amounts of hours as they will require all new code and diary activity logic. Modifying the existing forms will require many hours to remove PII data from all sections and to add and modify data. Once the proposed forms are implemented, it's expected that the burden of the proposed collection of information will be equal to or less than the current forms. Our state is currently involved in a Child Support Enforcement System (CSES) Replacement project with the intent of replacing outdated technology and improving operations in April 2019. The state is working with a Project Management Office and Business Assessment Review contractor to help develop more efficient and effective approaches while implementing a computer system replacement. The burden to the state can be minimized if the proposed forms are implemented as part of the computer system replacement.</p>	Implementation Timeframe Burden		<p>Thank you for your comment. We will keep this in mind for the future.</p>
56	State	General	<p>Adapt data fields for use in optical character recognition (OCR) OCSE has demonstrated a clear commitment to modernizing processes in light of new technology. Since many IV-D agencies are moving towards more automated processing and scanning of these forms, we hope that OCSE will consider a formatting method for important data fields that facilitates optical character recognition (OCR), such as the use of "comb fields" (see below for an example). Comb fields will reduce the chances of error when forms are electronically processed and OCR is used to transcribe important identifying information, such as case numbers and party names. <u>Petitioner First Name</u> <u>Petitioner Last Name</u> <u>Petitioner SSN</u> </p>	Technology		<p>Thank you for your comment. We will keep this in mind for the future.</p>

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Formatting Comments

#	Submitted By	Form	Comment	Category	Common	Comments/Notes
1	State	Declaration in Support of Establishing Parentage	Form page 3, above the Encryption requirements statement, there is an extra E.	Formatting	Extra E	We agree with the comment and have corrected the formatting.
2	State	Declaration in Support of Establishing Parentage	There is an extra "E" directly above "Encryption Requirements:" on page 3 of the form.	Formatting	Extra E	We agree with the comment and have corrected the formatting.
3	State	Declaration in Support of Establishing Parentage	There is a typographical error on page 3 of 3: there is an extra "E" on the line that reads "Encryption Requirements:"	Formatting	Extra E	We agree with the comment and have corrected the formatting.
4	State	Declaration in Support of Establishing Parentage	Section V. Declaration (page 3). Right above Encryption Requirements, there is an extra "E" that needs to be deleted.	Formatting	Extra E	We agree with the comment and have corrected the formatting.
5	State	Declaration in Support of Establishing Parentage	Page 3, Section V. Declaration: It is suggested that the "E" which appears in bold text below the date and signature lines be eliminated.	Formatting	Extra E	We agree with the comment and have corrected the formatting.
6	State	Declaration in Support of Establishing Parentage	There is an extra "E" on page 3 of 3 above the Encryption Requirements.	Formatting	Extra E	We agree with the comment and have corrected the formatting.
7	State	Declaration in Support of Establishing Parentage	The form would be easier to read and complete if the line spacing was adjusted to allow more space between lines.	Formatting	Space	We agree with the comment and have corrected the formatting.
8	State	Declaration in Support of Establishing Parentage	Section I., # 4. a., b., and c. should all be on one page. Line spacing adjustments may resolve this issue.	Formatting	Space	We agree with the comment and have adjusted the line spacing so that they appear together.
9	State	Declaration in Support of Establishing Parentage	Form item 3 "Note" should be indented to distinguish from next line item 4 as spacing and line items are inconsistent	Formatting		The word "Note" is now in bold font and the text is lined up consistently.
10	State	Declaration in Support of Establishing Parentage	Form item 4 – Date Marriage began and Date marriage legally ended lines should be left justified under the question.	Formatting		We agree with the comment. The fields are now left justified so those two lines of text line up.
11	State	Declaration in Support of Establishing Parentage	Form item 4a, 4b, 4c, 5 & 6: The "If yes" statements should be indented or in some way highlighted to distinguish the additional information being requested.	Formatting		The "if yes" text is consistently formatted within the form.
12	State	Declaration in Support of Establishing Parentage	Section III. Birth Mother Only, #1 (page 3). A closing parenthesis is missing after, "(other than the person I am naming as the respondent . . ."	Formatting		We agree with the comment and have corrected the formatting.
13	State	Declaration in Support of Establishing Parentage	Page 3, Section III. Birth Mother Only, Item 1: It is recommended that a closing parenthesis be added to the statement prior to Item 1.a. The statement would read as follows: I had sexual intercourse with a man (other than the person I am naming as the respondent).	Formatting		We agree with the comment and have corrected the formatting.
14	State	Declaration in Support of Establishing Parentage	Instructions Page 2: Text box for electronic communication should be above the words "Section I. Declaration: "	Formatting - I		We agree with the comment and have corrected the formatting.
15	State	General	The signature lines throughout all of the forms are not consistent.	Formatiing	Signatures	We agree with the comment and have made the formatting consistent.
16	State	General	We suggest adding more "white space" to all forms. Some of the spaces next to the field labels do not allow enough room to add the information in the space provided. This is especially true on the General Testimony.	Formatting	Space	We have added as much white space as possible to the forms.
17	State	General	Further, the font on many of the forms should be increased. Currently, it is very small and difficult to read.	Formatting	Space	The font is consistent on all forms. Where possible the font was increased.
18	State	General	The use of capitalization is not consistent throughout all of the documents, especially with like fields and names.	Formatting		We agree with the comment and have used consistent formatting with regard to capitalization.
19	State	General	Instructions- Capitalize all form items, case types, field names, etc. (i.e. Medicaid Only, Former Assistance, Notice of Healthcare Coverage , etc.)	Formatting - I		We disagree with this comment. We have not capitalized all form items and field names. However, we have revised the forms to be consistent in their use of capitalization.

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20	State	General	Forms should be formatted to the extent that states will need to support data capture. For example, entry lines should be reformatted to be displayed as data fields. State notes and appreciates the inclusion of data fields on the Personal Identifiable (PII) Form as well as sections of the General Testimony and suggests that similar changes would be appropriate on other forms. For example, the addition of data fields for the initiating jurisdiction information (i.e., location code, IV-D case identifier, and tribunal number) on the Child Support Enforcement Transmittal #1 - Initial Request would facilitate more efficient data entry and processing.	Formatting		We have made adjustments where possible to accommodate this request.
21	State	General Testimony	Page 6. Section VI. Additional Information for Child Support Calculation: It seems duplicative to have questions 1, 2, and 3 under Establishment and list them again as 3, 4, and 5 under Modification. Maybe list C as General Information or something else rather than duplicating.	Formatting	Additional Information for CS Calculation	We acknowledge the duplication, but information is relevant for both establishment and modification so we wanted to put it under each subheading rather than creating a third subheading about parentage time.
22	State	General Testimony	Section I. Personal Information About Petitioner, and section II. Personal Information About Respondent, E. Caretaker Information (page 2). Instead of combining these subsections within the petitioner and respondent sections, can this be made into a separate section for Personal Information About Caretaker?	Formatting	Caretakers	Thank you for your comment. The form has been revised to include a section for personal information about the obligee and the obligor. The section on the obligee includes I.E., which focuses on the caretaker.
23	State	General Testimony	Page 3. Section IV. Dependent Child (ren) in This Action: (A) (5) Suggest adding a box that asks whether the child is living with the respondent since the petitioner can be either the obligor or the obligee.	Formatting	Dependent Children	Thank you for your comment. We have made it clear who the petitioner is on all of the forms. The question is focused on whether the child lives with the petitioner because that is relevant if the petitioner seeks support.
24	State	General Testimony	Form Section V. Health Care Coverage: Recommend following sections A-C to be highlighted in some way to further distinguish to whom this portion of the form belongs.	Formatting	Dependent Children	Thank you for your comment. In Section V of the General Testimony we have bolded the titles to sections A-C to help identify to whom this portion of the form belongs.
25	State	General Testimony	Page 3. Section III. Legal Relationship of Parents of Children Listed in Section IV: (D) We would like to see similar options grouped together for ease of use. (i.e., "Separated on" and "Legally Separated on" and "Divorced on" and "Divorce pending in") put together on the same line or sequentially.	Formatting	Legal Relationship	We agree with this comment and have revised the form so that the options are arranged sequentially.
26	State	General Testimony	The General Testimony is very crowded. It is generally handwritten when completed by the CP and there is not enough space in the sections to allow for legible handwriting. Also, most states require that the document be completed in black ink and that is not stated on page 1 of the document.	Formatting	Space	Thank you for your comment. We have added as much white space as possible to the forms.
27	State	General Testimony	Instructions Page 1: Heading/Caption- the types of cases, should be capitalized to correspond to the form.	Formatting		Thank you for your comment. The case types are capitalized, but they are not in all caps or bolded as the form title.
28	State	General Testimony	Form Section VIII Financial Information: Item 6 has a Line _____ that goes to nowhere.	Formatting		We agree with the comment and have corrected the formatting.

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29	State	General Testimony	Some fields have a colon after and some do not (i.e., "Full name" does not; "child (ren) name(s)" does). Also, most fields do not have a line after them for completion but some do (i.e., Amount, Frequency, State and county/tribe/country).	Formatting		We agree with the comment and have corrected the formatting.
30	State	General Testimony	State suggests that the bolded text box outlines be removed or not bolded. The form is difficult to read with the bold lines. We suggest thin grayed lines if lines are needed.	Formatting		Thank you for your comment. The sections that have bolded lines around them are done that way intentionally to call attention to that sections.
31	State	General Testimony	Under Section I(C) and II(C), the "(If yes, provide information below.)" should follow the "Yes" option, as opposed to following the "No" or "Unknown" option.	Formatting		We disagree with this comment. To allow for consistent formatting across all forms, it worked best to have the "If yes" parenthetical occur at the end of the checkboxes.
32	State	General Testimony	In the Instructions, page 5, Section IV, Item 7, we believe the term "decadency" is supposed to be "descendancy".	Formatting		We agree with the comment and have corrected the spelling.
33	State	General Testimony	We noted some technical errors in the Instructions: 1) page 3, Section II, Part A, Item 2: there is a missing period at the end of the sentence; 2) page 4, Part E: there is a colon missing after "Item 2"; and 3) page 8, first italicized text box, first sentence: an "a" appears to be missing before "period of time".	Formatting		We agree with the comment and have corrected the formatting.
34	State	General Testimony	Page 1, between the caption and Section I., in the declaration, before the space for the petitioner to write his or her name, the word "I" needs to be added. This is a similar declaration as to what is found on the Declaration in Support of Establishing Parentage; therefore it should be standardized	Formatting		We agree with the comment and have standardized the formatting for the declaration in the two forms.
35	Organization	General Testimony	GT Form, page 7, VIII (intro sentence under the heading), possessive is missing. Sentence should be "Information required varies based on responding jurisdiction's support guidelines.	Formatting		We agree with the comment and have made the change to the form.
36	State	Letter of Transmittal Requesting Registration	State would appreciate additional space to indicate multiple time periods when assistance was active.	Formatting	Space	We disagree with the comment. The form requires attachment of documentation of TANF time periods. The Forms Workgroup decided it was preferable to have such information in a supplemental attachment rather than on the form itself since UIFSA does not require that information for registration.
37	State	Letter of Transmittal Requesting Registration	Form page 1, Header: Initiating IV-D Case Identifier and Initiating Tribunal Number should be in vertical alignment with each other.	Formatting		We agree with the comment and have corrected the formatting so that the colons are aligned.
38	State	Letter of Transmittal Requesting Registration	Instructions Page 1: Non-disclosure information box is too small cutting off the final sentence. Also, formatting typeface and margins are inconsistent in second paragraph.	Formatting		We agree with the comment and have corrected the formatting.
39	State	Letter of Transmittal Requesting Registration	Instructions Page 2: Section I. Case Summary: should be below the text box regarding electronic communications.	Formatting		We agree with the comment and have corrected the formatting.
40	State	Letter of Transmittal Requesting Registration	We noted a technical error on the form: Section V, there is a period missing after the last sentence following "Note:".	Formatting		We agree with the comment and have corrected the formatting.
41	State	Letter of Transmittal Requesting Registration	Instructions - The last box on page 1 of the instructions has text that does not appear to fit within the box. The last sentence in the box is "In addition to identifying information included on this form, it may be." The sentence is not complete.	Formatting - I		We agree with the comment and have corrected the formatting.

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42	State	Letter of Transmittal Requesting Registration	Instructions - On the first page, after Nondisclosure finding/Affidavit, in the box, the very last sentence is states, "In addition to identifying information included on this form, it may be". It appears this sentence is incomplete.	Formatting - I		We agree with the comment and have corrected the formatting.
43	State	Letter of Transmittal Requesting Registration	In the Instructions, page 1, last italicized text box, it appears the end of the last sentence is missing, as the sentence cuts off after "it may be". Also, on page 2, Section 1, second paragraph following the italicized text box, the label "Type of Obligation" is not used anywhere on the form. Is this label supposed to correspond with the label "Current Obligation"? For clarity purposes, we believe the labels used in the instructions should be verbatim with the labels used in the form.	Formatting - I		We agree with the comment and have corrected the formatting and ensured the instructions are consistent with the form.
44	State	Locate Data Sheet	Form page 1: Additional extraneous lines are above the Requesting Location Code and should be removed.	Formatting		We agree with the comment. The lines have been removed.
45	State	Locate Data Sheet	In the title of this form, it shows "CHILD SUPPORT LOCATE DATA SHEET – Use CSENet if Agreement IS IN Place. Because "IS IN" is capitalized, shouldn't "if" be as well to be consistent?	Formatting		We agree with the comment. We have changed the title to read: "Use CSENet if agreement is in place"
46	State	Locate Data Sheet	Heading, Location Code - Remove the floating lines above the "Location Code" and "State" lines.	Formatting		We agree with the comment. The lines have been removed.
47	State	Notice of Determinatio of Controlling Order	On the first page, #6, under "Check to confirm that the notice and order were also sent to:", the first option/box "All IV-D agencies in the states listed in the table above." has a period at the end, but the other options do not. The period should be removed to be consistent.	Formatting		We agree with the comment. We have removed the period from the first option.
48	State	Notice of Determinatio of Controlling Order	Instructions Page 2: - Move "Body of the Form" header below the description box about CSENet & EDE.	Formatting	CSENet	We agree with this comment. The heading "Main Body of the Form:" will be moved after the box. This will be done on all forms.
49	State	Notice of Determinatio of Controlling Order	Instruction Page 1: 4th bullet should not have a comma after i.e.	Formatting		We disagree with this comment. The statement should have a comma after the i.e.
50	State	Notice of Determinatio of Controlling Order	Instruction Pages 1 & 2: Formatting changes: Text boxes on the pages do not align with each other and should be corrected. Bullet points should be tabbed behind the leading edge of the text boxes and be in alignment with each other.	Formatting		We agree with the comment. The headers, bullets and text boxes should align.
51	State	Personally Identifiable Information	Page 2. Section 3. Also, the word "Gender" is misaligned with other terms in Section 3; it needs a space added before the word.	Formatting	Space	We agree with the comment and have corrected the formatting. Note that this information, which was on the PII form, is now on the new PERSONAL INFORMATION FORM FOR UIFSA § 311.
52	State	Personally Identifiable Information	We noted a technical error in the PII Form on page 2, Section 3, "Alias" field: there is an extra space after "e.g." prior to the comma and then no space in between the comma and "maiden".	Formatting		We agree with the comment and have corrected the formatting. Note that this information, which was on the PII form, is now on the new CHILD SUPPORT AGENCY CONFIDENTIAL INFORMATION FORM.

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53	State	Personally Identifiable Information	We noted technical errors in the Instructions: 1) page 2, the first word is missing an "I"; 2) page 2, Section 2, first bullet, the order of the names is not consistent with the order on the form (nor is it consistent with the Instructions of any other forms); 3) page 2, Section 3, first bullet, the order of the names is not consistent with the order on the form (nor is it consistent with the Instructions of any other forms); and 4) page 3, Section 4, first bullet, the order of the names is not consistent with the order on the form (nor is it consistent with the Instructions of any other forms).	Formatting		Thank you for your comment. The information, which was previously on the proposed PII form, is now on two new forms: the PERSONAL INFORMATION FORM FOR UIFSA § 311 and CHILD SUPPORT AGENCY CONFIDENTIAL INFORMATION FORM. We have ensured the names of fields in the Instructions are consistent with the names on the forms.
54	State	Transmittal #1 Acknowledgment	At the top of the first page, following the title of the document in the second sentence, it looks like there are extra spaces before "intended" and before "communication" that need to be removed.	Formatting		We agree with the comment and have corrected the formatting.
55	State	Transmittal #2	Additional space is needed in Section II, Intergovernmental Closure Actions, for the initiating state to explain why the IV-D case is closed. We suggest moving "From Responding Agency:" and option (3) to page 2. We also suggest that more white space be added anywhere a state is to enter text.	Formatting	Space	We agree with the comment and have corrected the pagination. We have also added as much white space as possible to the forms.
56	State	Transmittal #2	Instructions Page 2: Section I. Case Processing Actions: should be below the text box regarding electronic communications.	Formatting		We agree with the comment and have corrected the formatting.
57	State	Transmittal #2	In the Instructions, page 2, first italicized text box, second paragraph, we believe the phrase "identify information" is supposed to be "identity information" for consistency with instructions to other forms.	Formatting		We agree that the forms need to be consistent. We have changed the word to "identifying information" in all of the forms.
58	Organization	Transmittal #2	T-2, Instructions, page 1 – the text box that now appears below "Section I Case Processing actions" really relates to the method of sending information and should appear BEFORE the Section I heading. This applies to many forms.	Formatting		We agree with the comment and have corrected the formatting.
59	State	Transmittal #3	We noted a technical error in the heading of the Request in the first field labeled "Assisting IV-D Case Identifier": there is a space within the word "Identifier".	Formatting		We agree with the comment and have corrected the formatting.
60	State	Transmittal #3	Form Page 2 – there is an extra space in the words "Nondisclosure Finding/Affidavit."	Formatting	Nondisclosure	We agree with the comment and have corrected the formatting.
61	State	Transmittal #3	Page 1, Section II. Other Pertinent Information: State recommends that additional space be provided in this section.	Formatting	Space	Thank you for your comment. We have added as much white space as possible to the forms.
62	State	Transmittal #3	Instructions Pages 1 & 2: Text boxes on the pages do not align with each other.	Formatting		We agree with the comment and have corrected the formatting.
63	State	UIFSA 319	Instructions Page 2: the words "SECTION I. ACTION:" should be below the two text boxes and above the words "Requesting Agency."	Formatting		We agree with the comment and have corrected the formatting.
64	State	UIFSA 319	Instructions Page 2: The instructions for filling out check boxes 1 and 2 should be separated from the rest of the paragraph.	Formatting		We agree with the comment and have corrected the formatting.
65	State	Uniform Support Petition	Instructions Page 2: - Move "Body of the Form" header below the description box about CSENet & EDE.	Formatting	CSENet	We agree with the comment and have corrected the formatting.
66	State	Uniform Support Petition	At the top of the first page, following the title of the document in the second sentence, it looks like there is an extra space before "intended" that needs to be removed.	Formatting		We agree with the comment and have corrected the formatting.
67	State	Uniform Support Petition	We noted some technical errors: 1) Section II of Petition: there is an extra space between "in" and "support"; 2) Instructions, page 3, Section III: there is an extra space between "documents" and "being"; and 3) Instructions, page 3, last box with italicized text, second sentence: it should be "state's" (possessive).	Formatting		We agree with the comment and have corrected the formatting.

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#	Submitted By	Form	Comment	Category	Common	Comments/Notes
1	State	Declaration in Support of Establishing Parentage	The section to be completed by the petitioner for the NCP looks to be very helpful and more concise.	Comment - Supportive		Thank you for your comment.
2	State	Declaration in Support of Establishing Parentage	Like formatting, content and instructions.	Comment - Supportive		Thank you for your comment.
3	State	Declaration in Support of Establishing Parentage	State strongly supports the terminology change from paternity to parentage because it will facilitate services to all families.	Comment - Supportive		Thank you for your comment.
4	State	General	We support the removal of the notary requirement on forms. The wording "under penalty of perjury" meets UIFSA requirements. No longer requiring a notary will cut down on agency expenses and allow timelier processing of UIFSA transmittal requests.	Comment - Supportive	Notary	Thank you for your comment.
5	State	General	We like the addition of Encryption Requirements, and the elimination of Notary signatures where this was done.	Comment - Supportive	Notary	Thank you for your comment.
6	State	General	First, we wanted to pass on kudos to the Intergovernmental Forms Workgroup for the hard work that went into the review and revision of the Intergovernmental Forms. The time and effort put forth is evident in the final product, which is excellent. Especially of note is the level of protection regarding Personal Identifying Information (PII) that will now be afforded to all customers. In the day and age in which we live, we cannot be too careful in protecting the information and identities of those whom we serve. Additionally, removing the Notary requirement from the forms is a welcome step as this imposed what we viewed as an unnecessary requirement/barrier to the customer. The "penalty of perjury" language is very real and accomplishes the same goal as the notarization step or "on oath" statement. Finally, those who design forms for the reality of the ever evolving family can appreciate the steps taken to make all forms gender neutral. This, too, was quite well done.	Comment - Supportive	Notary	Thank you for your comment.
7	State	General	I would personally like to thank all the states that worked on these amendments. I am sure there were many hours of hard work and I appreciate their time and effort.	Comment - Supportive		Thank you for your comment.
8	State	General	The forms do look good.	Comment - Supportive		Thank you for your comment.
9	State	General	The State agrees with most of the proposed changes, and believes they will streamline the intergovernmental process. Overall, we believe the changes will support more efficient case processing and better service to customers in intergovernmental cases.	Comment - Supportive		Thank you for your comment.
10	State	General	The State would like to acknowledge the efforts of all those involved in the redesign of the federal forms. We appreciate the thought and foresight that has gone into the revisions made. The new forms will benefit the child support programs and their customers alike.	Comment - Supportive		Thank you for your comment.

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11	State	General	We appreciate the opportunity to look through and review the Proposed Intergovernmental Forms and Summaries as well as the new forms. Overall we really like the changes you have made and especially the addition of the two new forms, the Personal Identifiable Information (PII) and the Child Support Agency Request for Change of Payment Location Only pursuant to UFISA § 319(b) . We believe both of these forms will be extremely helpful in assisting state expedite interstate case processing as well as deal with some of the problems we have had in the past.	Comment - Supportive		Thank you for your comment.
12	State	General	We agree with the updated terminology used in the forms that more accurately depict current family structures and allow the forms to be used by either party. The use of the terms obligor and obligee in lieu of the previous mother and father are especially notable changes we find beneficial. We also approve of the use of "jurisdiction" instead of agency or state as it meets the needs of all entities. We like the change of the section on most forms previously titled "Additional case information" to "Other pertinent information" which more accurately describes the information being provided and its importance.	Comment - Supportive		Thank you for your comment.
13	State	General	Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; All proposed forms are deemed necessary for ideal performance and the collection of information will have practical utility in conducting child support business. The introduction of email and cell phone number fields are especially useful as some courts may require the other party to attend telephonically. The indication that a form can be noted as sent through Electronic Document Exchange (EDE) encourages use of technology to deliver more efficient and improved services.	Comment - Supportive		Thank you for your comment.
14	State	General	Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology. Initially State will obtain this information from custodial parents (usually obligees) through an application for IV-D services or through an interface IV-A referral to our system. Once the case is created, additional information gathering occurs on the non-custodial parent through interviews, documents, research conducted by field staff, and automated search and collection functions in our system. The automated search and collection functions occur when our system communicates with outside databases from sources such as other state agencies, employers and interstate agencies. The automated collection is very comprehensive and as we begin to lay the groundwork for a new system, we look to improve efficiencies for locating and collecting information on non-custodial parents.	Comment - Supportive		Thank you for your comment.
15	State	General	The introduction of the Child Support Agency Request for Change of Support Payment Location Pursuant to UIFSA Section 319(b) form is especially useful. State 1 currently receives a large number of requests for payment redirect from State 2 and State 1 has created its own form and process as a result. The standardized form will help ensure information collection is consistent across all intergovernmental agencies and will assist State 1 with developing an improved, consistent process for dealing with these requests.	Comment - Supportive		Thank you for your comment.

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16	State	General	We agree with the decisions on several forms (Transmittal #1, Transmittal #3, Uniform Support Petition, etc.) to remove Controlling Order references. We agree that with the length of time UIFSA has been in effect, controlling order determinations are no longer a common issue and therefore unnecessary to be noted on forms.	Comment - Supportive		Thank you for your comment.
17	State	General	The quality, utility, and clarity of the information to be collected; The quality of information to be collected by the new forms is an improvement over current forms and should improve the business of child support. The proposed forms are organized well and capture data clearly. An example to clarify is the distinct information collected for Born Out of Wedlock/Paternity Establishment/Place of Birth for dependents. Our state underwent a Data Reliability Audit this year and it became evident that we lacked clear BOW/PE/POB information in interstate cases. In addition, the gender neutral replacements of obligor and obligee throughout the forms allow for a more accurate description of case composition, which includes non-mother custodial parents and potentially same sex cases, and makes for more useful data when working cases. Finally, the addition of an indicator identifying which forms are inter-agency documents and which are to be filed with the courts improve the overall UIFSA process.	Comments - Supportive		Thank you for your comment.
18	State	General Testimony	Section VI is more detailed and very much liked.	Comment - Supportive	Additional Information for CS Calculation	Thank you for your comment.
19	State	General Testimony	Section VI. Additional Information for Child Support Calculation - We like the split of this section into Establishment and Modification portions. A. Establishment. We like the detailed listing in #4., d., of the specific types of assistance that the children have received, the time frames and in what state. This provides a better history and could alleviate the potential issues later in the case. B. Modification. We like question #1 which asks whether the modification is being sought for an existing order issued by the responding tribunal or for an order that requires registration for modification and enforcement.	Comment - Supportive	Additional Information for CS Calculation	Thank you for your comment.
20	State	General Testimony	The Dependent Child(ren) in This Action section is nice.	Comment - Supportive	Dependent Children	Thank you for your comment.
21	State	General Testimony	The additional detail in Section VIII is also appreciated.	Comment - Supportive	Financial Information	Thank you for your comment.
22	State	General Testimony	Section VII. Financial Information - We agree with the removal of current spouse/partner and obligor's dependents under the income portion. We support the changes to make this form more income based and the removal of the expenses/ assets in this section. Asset or expense information could still be added in the "other pertinent information" section if necessary.	Comment - Supportive	Financial Information	Thank you for your comment.

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23	State	General Testimony	<p>V. Health Care Coverage - We would propose changing the order of the parties to Petitioner, Respondent and then children. Also, since the health care coverage is often the same for each child, we would like the option to choose a box that simply states "Same as child one". If the information is the same information as the Petitioner or Respondent, an option of "Same as Petitioner" and "Same as Respondent" may also eliminate the need to enter repetitive information.</p> <p>We like the expanded detailed selections listed under both the children and Petitioner/Respondent as to how health care coverage is currently being provided and by who (Individual policy, employer, Medicaid, CHIP, TRICARE.)</p>	Comment - Supportive	Health Care Coverage	Thank you for your comment.
24	State	General Testimony	<p>Section IV. Dependent Child(ren) in This Action - If there is only one child on the case but there is space for three on this form, can the form be condensed to only include the fields for the one child, omitting the other two child fields? Can we condense the form for number of children or do we have to stay true to the form layout?</p> <p>We support the detailed request for SSA/VA benefit information -type of benefit, amount, on whose claim. Not only is this information important for establishment and modification of right-sized orders, it will also be useful for enforcement. State grants the obligor credit towards his/her current support obligation for the benefit the child receives on the obligor's claim.</p>	Comment - Supportive	More than 3 Children	Thank you for your comment.
25	State	General Testimony	The removal of the notary requirement is a very favored update.	Comment - Supportive	Notary	Thank you for your comment.
26	State	General Testimony	Though this form is lengthy, the more detailed information it requests will help with entering right-sized orders.	Comment - Supportive		Thank you for your comment.
27	State	General Testimony	The General Testimony contains considerably less information about the custodial parent than the current version. It has income information, but no expense information like the old version. However, the cost of health insurance and child care expenses are found elsewhere in the form. It seems to contain what we typically need.	Comment - Supportive		Thank you for your comment.
28	State	Letter of Transmittal Requesting Registration	We are pleased with the removal of the notary requirement.	Comment - Supportive	Notary	Thank you for your comment.
29	State	Letter of Transmittal Requesting Registration	Positive change: notary no longer required.	Comment - Supportive	Notary	Thank you for your comment.
30	State	Letter of Transmittal Requesting Registration	Like formatting, content and instructions.	Comment - Supportive		Thank you for your comment.
31	Organization	Letter of Transmittal Requesting Registration	Registration Statements: Workers claim that that they are not uniform. Happily, the draft does appear to address their concerns . Workers stated that the current version does not allow them to indicate the spousal support separately from child support, does not allow them to state the payment frequency , and does not allow them to separate the arrears principal from the interest.	Comment - Supportive		Thank you for your comment.
32	State	Locate Data Sheet	Like formatting, content and instructions.	Comment - Supportive		Thank you for your comment.

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33	State	Locate Data Sheet	Section I. Locate - We like the terminology change from noncustodial and custodial parent to the person who owes or may owe support and person who is owed support. We also like the addition of caretaker.	Comment - Supportive		Thank you for your comment.
34	State	Notice of Determination of Controlling Order	Item #3 is an excellent addition to the form.	Comment - Supportive		Thank you for your comment.
35	State	Notice of Determination of Controlling Order	Like formatting, content and instructions.	Comment - Supportive		Thank you for your comment.
36	State	Notice of Determination of Controlling Order	We like the inclusion of this sentence which clarifies the initial controlling order state governs the duration of the support obligation.	Comment - Supportive		Thank you for your comment.
37	State	Notice of Determination of Controlling Order	We like the listing of the selections for who the notice and order were sent to. This is clear and concise.	Comment - Supportive		Thank you for your comment.
38	State	Personally Identifiable Information	State supports the development and utilization of a new form that contains all personal identifying information for IV-D cases, as well as the corresponding removal or redaction of personal identifying information on the existing intergovernmental forms.	Comment - Supportive		Thank you for your comment.
39	State	Personally Identifiable Information	We like the addition of this new form for the added confidentiality protection it provides to safeguard personal information.	Comment - Supportive		Thank you for your comment.
40	State	Personally Identifiable Information	We are very excited to have this form.	Comment - Supportive		Thank you for your comment.
41	State	Personally Identifiable Information	Like the formatting and the data elements.	Comment - Supportive		Thank you for your comment.
42	State	Personally Identifiable Information	The introduction of the Personal Identifiable Information (PII) form would allow the State to capture personal identifiable information in one place, thus reducing redundancy throughout other forms and providing improved protection for non-disclosure cases. The information to be captured on the PII form is required in order to proceed with establishing and/or enforcing a case.	Comment - Supportive		
43	State	Transmittal #1	Like the instructions, content and formatting.	Comment - Supportive		Thank you for your comment.
44	State	Transmittal #1 Acknowledgement	We strongly supports the "acknowledgment form" and suggests that a sub-box be included in the right column to indicate whether the requested order needs to be "certified" or just a copy.	Comment - Supportive	Certified	Thank you for your comment. Note that states are required to use the OMB approved Intergovernmental Forms.
45	State	Transmittal #1 Acknowledgement	We like the change in making this form a standalone document. The state sends acknowledgments via CSENet. This form would be used only for non-CSENet capable entities.	Comment - Supportive	CSENet	Thank you for your comment.
46	State	Transmittal #1 Acknowledgement	We like the change to separate this from the Transmittal #1, because we don't ever use the form provided by the initiating state when we acknowledge a case; we use our own system-filled acknowledgment.	Comment - Supportive		Thank you for your comment.
47	State	Transmittal #1 Acknowledgement	We are very pleased to see this separated out as a stand-alone document.	Comment - Supportive		Thank you for your comment.
48	State	Transmittal #1 Acknowledgement	We really like the additional place to remark "Responding jurisdiction will proceed with administrative enforcement of the order without registration". We feel this will help clear up a lot of confusion.	Comment - Supportive		Thank you for your comment.
49	State	Transmittal #1 Acknowledgement	Like the Acknowledgement selections, good variety and meaningful to case management.	Comment - Supportive		Thank you for your comment.
50	State	Transmittal #2	We are also pleased about the addition of the Closure Actions section.	Comment - Supportive	Case Closure	Thank you for your comment.

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51	State	Transmittal #2	Positive change: Splitting the Providing and Requesting actions into separate sections. Intergovernmental Closure actions section.	Comment - Supportive	Case Closure Providing/ Requesting	Thank you for your comment.
52	State	Transmittal #2	We are extremely pleased about the breaking out of the information for Providing vs Requesting. That will make processing these requests much clearer for all concerned.	Comment - Supportive	Providing/ Requesting	Thank you for your comment.
53	State	Transmittal #2	Section III. Other Pertinent Information - We like the ample space provided in this section. Space was limited previously.	Comment - Supportive	Space	Thank you for your comment.
54	State	Transmittal #2	On Transmittal #2 we feel breaking out the case processing actions into two sections (providing and requesting) is a positive change.	Comment - Supportive		Thank you for your comment.
55	State	Transmittal #2	Like the formatting, content and instructions	Comment - Supportive		Thank you for your comment.
56	State	Transmittal #2	We like that this form has been made more user- friendly for both initiating and responding jurisdictions. We agree with the removal of the acknowledgment from this form as no longer necessary.	Comment - Supportive		Thank you for your comment.
57	State	Transmittal #3	We like the change that separates the action section between required and optional services.	Comment - Supportive		Thank you for your comment.
58	State	Transmittal #3	Header - We support the change in terminology from Responding/Initiating on this form to the proposed Assisting/Requesting as it conforms to the noncase opening nature of the form.	Comment - Supportive		Thank you for your comment.
59	State	UIFSA 319	Request for change of support payment location. My concern is that when the state that issued the order sends a new withholding order to the employer, redirecting support from our SDU, to the SDU of the requesting state, how can the issuing state, as the custodian of the records, keep track of payments made under their order. What happens if the CP then moves from the requesting state? Will the requesting state then send the issuing state a request to change the payment location back to the issuing state's SDU? Will they be required to provide a certified pay record and arrears record? I can see a lot of problems coming from this action.	Comment Concern	Policy Direction	Thank you for your comment.
60	Organization	UIFSA 319	The form is a good idea to provide documentation and communication between states involved; however, it should be noted that a best practice would prefer proper registration and assumption of CEJ especially when orders still contain current support obligations to provide more comprehensive services to families	Comment - Supportive		Thank you for your comment.
61	State	Uniform Support Petition	Section II. Grounds Supporting the Remedy Sought in Section 1 - We like the addition of "it has been 3 years since the last review" in the modification wording. Our state follows the 3 year guideline.	Comment - Supportive	3 year	Thank you for your comment.
62	State	Uniform Support Petition	Positive change: removal of notary requirement..	Comment - Supportive	Notary	Thank you for your comment.
63	State	Uniform Support Petition	The USP does have a declaration sufficient to comply with the rule that Petitions be verified.	Comment - Supportive	Petition Verification	Thank you for your comment.
64	State	Uniform Support Petition	Like instructions and formatting.	Comment - Supportive		Thank you for your comment.
65	State	Uniform Support Petition	Section 1. Actions - We agree with the actions as listed.	Comment - Supportive		Thank you for your comment.

