Supporting Statement for OMB Clearance

Intergovernmental Reference Guide (IRG)

March 2018

Prepared by:

U.S. Department of Health and Human Services Administration for Children and Families Office of Child Support Enforcement 330 C Street, SW, Washington, DC 20201

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A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

Maintained by the Office of Child Support Enforcement (OCSE), the Intergovernmental Reference Guide is a centralized and automated repository of state and tribal profiles, which

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contain high-level descriptions of each state and tribal child support enforcement (CSE) program. The available information includes, but is not limited to:

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

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- Paternity establishment, enforcement and modification, and review/adjustment of child support orders, lump sum payments, and insurance matching
- Directory of all federal, state, tribal, and local addresses, and locator codes/addresses (formally FIPS codes)

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

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The IRG information collection activities are authorized by: (1) 42 U.S.C. §652(a)(7), requires OCSE to provide technical assistance to state child support enforcement agencies to help them establish effective systems for collecting child and spousal support; (2) 42 U.S.C. §666(f), requires states to enact the Uniform Interstate Family Support Act; (3) 45 CFR 301.1, defines an intergovernmental case to include cases between states and tribes; (4) 45 CFR 309.120, requires a tribal child support program to include intergovernmental procedures in its tribal IV-D plan; and (5) 45 CFR 303.7, requires state child support agencies to provide services in intergovernmental cases.

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2. Purpose and Use of the Information Collection

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

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

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

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

3. Use of Improved Technology and Burden Reduction

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

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4. Efforts to Identify Duplication and Use of Similar Information

The IRG program is unique. Additionally, there is no other process like IRG that is available to state and tribal child support agencies that have the capability to serve as a central source to assist with processing intergovernmental child support cases.

5. Impact on Small Businesses or Other Small Entities

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There is no impact to small entities.

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6. Consequences of Collecting the Information Less Frequently

Timely collection and dissemination of IRG information is vital to efficient and effective processing of intergovernmental child support cases. The state and tribal profiles, locator codes, and address information contained in the IRG are used to facilitate the timely exchange of information. Without the IRG, this comprehensive, up-to-date profile and address information will not be available for the processing of intergovernmental child support cases in a timely manner.

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7.	Special Circumstances Relating to the Guidelines of 5 CFR 1320.5
	Not applicable.
8.	Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency
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A notice was published in the Federal Register, at 83 Fed. Reg. 531 on January 4, 2018, which allowed for a 60-day comment period for the public to submit in writing any comments about this information collection.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

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Confidential respondent data are requested for this information collection. The IRG contains state and tribal contact information. Only authorized users can view all IRG contact information. The public can view a limited subset of addresses. The IRG is used to facilitate the timely exchange of information on intergovernmental cases.

11. Justification for Sensitive Questions

Not applicable.

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12. Estimates of Annualized Burden Hours and Costs

Table 12.1 Estimated Burden

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

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

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

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

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Estimated Total Annual Burden Hours: 626.40

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The annual burden for collecting IRG information from states and territories remains at 291.60 hours, based on 54 states and territories providing an average of 18 updates each year, at approximately 0.3 hours per update.

The annual burden for collecting IRG information from tribes remains at 334.80 hours, based on 62 tribes providing an average of 18 updates each year, at approximately 0.3 hours per update.

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Annual burden hours were estimated through consultations with a representative group composed of five child support agencies.
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The total annualized cost to the states and tribes for collection of IRG information is \$14,307.	
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The total cost is based on an hourly wage rate of \$22.84¹ for staff time. The increase in the total annualized costs from the previous Paperwork Reduction Act (PRA) submission is due to a slight increase in the hourly wage rate estimate based on the most current Bureau of Labor Statistics figures.

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

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Ongoing maintenance of IRG information from states and tribes uses existing resources (staff or personal computers); therefore, there are no operation/maintenance costs. Tribes already use the IRG via the Internet, so there are no start-up costs for tribes; OCSE bears all maintenance costs.

14. Annualized Cost to the Federal Government

Total annualized cost to the federal government is estimated to be \$618,724. This includes federal salaries and benefits of \$88,736 and contractor and hardware/software costs of \$529,988. The

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increased costs to the federal government are due to normal escalation of contract costs since the last report.

15. Explanation for Program Changes or Adjustments

One program change was made from the previous information collection approval: Twenty-eight (28) additional State Profile questions were added, to include the Hague questions, which are pertinent to intergovernmental child support processing. These additional changes do not

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⁴ Source: Bureau of Labor Statistics, National Occupational Employment and Wage Estimates May 2016

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impact the burden hours for the respondents. There were no changes to the Tribal profile questions.

16. Plans for Tabulation and Publication and Project Time Schedule

There are no plans for tabulation and publication.

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

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18. Exceptions to Certification for PRA Submissions

Not applicable.

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PART B – COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

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

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