

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
1	07/11/19	MN	All	Change "Expiration Date" to "Review Date" - Having a date labeled as "Expiration Date" on the forms creates confusion and makes people think the forms are no good after the date on the document. When OMB does not review the document and have updates made by the expiration date, it creates issues with employers, courts, and caseworkers accepting the documents as they believe them to be invalid. It also creates issues when other states cannot get the documents reprogrammed timely in their systems.	OMB Form	We disagree. From OMB: The term expiration date is codified in our regs at 5 CFR 1320.8: (b) Such office shall ensure that each collection of information: (1) is inventoried, displays a currently valid OMB control number, and, if appropriate, an expiration date Decision - No change
2	07/26/19	CO	All	Give each form a unique number or abbreviation. States have developed their own numbers/lingo for referring to the forms and use those when communicating with other states; however, since these aren't standard, the other state doesn't always know what form they are referring to which creates delays in processing cases.	Unique Number or Abbreviation for all forms	We disagree. Most states have their own unique number for each form and if OCSE tried to add another number that would be confusing. A state can refer to the title of the form to identify the forms. Decision - No change
3	08/19/19	ERICSA	All "Instructions"	In the instruction box concerning CSENet transactions: Change "should" in the first paragraph, fourth sentence, "If certified copies are needed, hard copies should also be sent by mail", to a "may" because if a certified order is sent through EDE a hard copy is not required to be sent.	Certified Copies	We agree. Decision - Make changes reflected in Comment 13a.
4	08/19/19	ERICSA	All "Instructions"	In the instruction box concerning CSENet transactions: Split the first paragraph in that same instruction box into two beginning with the sentence, "Supporting documentation should be sent..." to clarify to the worker that CSENet cannot be used to send documentation.	CSENet	We agree. Decision: We have split the first paragraph as the commenter suggested. To provide additional clarification, we have revised the first sentence to indicate that both CSENet and EDE are the recommended methods for making requests and sending information, deleted everything after the sentence: "Supporting documentation should be sent ...", and removed the numbering. We are making this change to instructions across all the forms. The revised instruction reads: CSENet and EDE transactions are the recommended methods 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 or information. Supporting documentation should be sent through EDE, whenever possible

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
5	8/19.2019	MO - Prosecuting Attorney	Burden Hours	The Paperwork Reduction Act of 1995 public reporting burden is grossly underestimated for these forms when considering the length of time our staff need for the three activities of reading instruction, gathering information, and recording answers on the form	Burden	<p>We agree. Decision: The time we estimated to complete each form is an average of the different ways the forms could be completed. We received only one comment on burden, and did not consider this enough evidence to change the burden.</p> <p>In response to an OMB comment, however, we have increased the estimated time it takes to complete each form by 25%. We have updated the PRA statement on each form and revised the supporting statement to reflect these changes..</p> <p>Following the renewal of the forms, we will reach out to states to gather more information on how long it takes for each form to be completed and calculate a more precise burden estimate based on user experience.</p>
6	08/15/19	MO	Child Support Agency Confidential Information Form	We agree with the descriptive change to the purpose of the form instructions adding two new sentences at the end of the paragraph to describe what other forms the Child Support Confidential Information form may accompany. We suggest the form could be updated a step further to indicate it should be sent with a Child Support Enforcement Transmittal #2- Subsequent Actions if the responding state has not yet assigned a case number and with the Child Support Enforcement Transmittal #3-Request for Assistance/Discovery if the case identifier in the requested state is unknown.	Add Referenced Forms	<p>We agree. We agree that greater clarity is needed, although the proposed language may be too prescriptive. Rather, for clarity, we have added language to the instructions. Decision: The revised instructions read: "The Child Support Agency Confidential Information Form is needed for most actions being requested on the Child Support Enforcement Transmittal #2 and the Child Support Enforcement Transmittal #3, since most of the identifying information has been removed from those forms. It should be included with the Child Support Enforcement Transmittal #3 if the IV-D case identifier or tribunal number in the assisting state is unknown."</p>
7	07/11/19	MN	Child Support Agency Confidential Information Form	Add Race/Ethnicity Fields for parents and children to help states capture accurate data from another state	Race/ Ethnicity	<p>We disagree. This information is on the General Testimony and is otherwise too difficult to add to this form, and not necessary. Only one comment. Decision: No change.</p>
8	07/30/19	UT	Child Support Agency Confidential Information Form Instructions	"The information on the form may be disclosed only as authorized by law." Every other form with this language does not contain "only". Is there a reason for the distinction? If it is because of the confidential aspect of the form, should "only" also be included in the "Child Support Locate Request" and its instructions?	Terminology	<p>We disagree. Instructions for the Child Support Agency Confidential Information Form are slightly different, as the statement on the form includes the word "only". This was added because the form contains extensive PII. Disclosure should be rare, so should be disclosed only if authorized. Decision: No change.</p>
9	07/29/19	ND	Child Support Agency Confidential Information Form Instructions	Two technical errors in the instructions: 1) page 3, Section II: the text in the italicized text box does not identify a field in Section II of the form, appears to repeat a portion of text in an italicized text box in Section I of the instructions, and abruptly ends mid-sentence; and 2) page 3, Section III: there is a period missing after the sentence which states, "If "Other," describe how the parent-child relationship was established".	Instructions	<p>We agree. Decision: We've addressed the duplicate text box and we have also added the missing period.</p>

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
10	08/15/19	NY	Child Support Agency Confidential Information – Instructions	Page 1, Purpose of the Form: NYS OTDA appreciates the language added under Purpose of the Form as it significantly clarifies when and how this form must be used (i.e., identification of the intergovernmental forms associated with the Child Support Agency Confidential Information Form).	Instructions	Thank you for your comment.
11	08/12/19	FL	Child Support Agency Confidential Information Form	The proposed changes are beneficial. Under Instructions, page 3, a new instruction box has been added at the bottom of section II that appears to be an error. The information contained in the box is not included in section II of the form and the statement is incomplete. The box is not included in the current version of the form and was not indicated as a change in the summary of changes.	Certified Copies	We agree. Decision: See comment 9.
12	08/15/19	IN	Child Support Agency Confidential Information Form	On page 3 of the instructions in the box at top of the page – the last sentence is cut-off. The missing word may be “services”	Certified Copies	We agree. Decision: See comment 9. The text box has been deleted since it was a duplicate.
13a	08/15/19	IN	Child Support Agency Confidential Information Form	The following sentence on page 2 of the instructions should be removed: “If certified copies are needed, hard copies should also be sent by mail.” PIQ 18-01 clarified that original documents transmitted electronically may not be excluded from evidence on an objection based solely on the means of transmission.	Certified Copies	We agree. Decision: Delete “If certified copies are needed, hard copies should also be sent by mail.” This change is to be made across all forms.
13b	08/20/19	VA	Child Support Agency Confidential Information Form	The Division supports the proposed change. This is great information and the additional wording under “Purpose of the Form” provides clarity of which intergovernmental forms this must be included with and the others which it may be.	Agreement	Thank you for your comment.
14	08/12/19	FL	Child Support Enforcement Transmittal #1 - Initial Request	The proposed changes are beneficial. Instructions page 1 - Form name at top of page is missing hyphen.	Formatting	We agree. Decision: The missing hyphen will be added to the instructions.
15	08/12/19	FL	Child Support Enforcement Transmittal #1 - Initial Request	Section I. Action - Change description of option 3.E. to make clear the option is selected when there has been a change in custody. Many states request/require Transmittal 1 with option 3.E. when requesting a redirection of payments to the state where the parent due support now resides. Perhaps: “Change payee of funds due to change of custody and enforce”	Clarification	We Disagree. Decision: The instructions note this.
16	08/12/19	FL	Child Support Enforcement Transmittal #1 - Initial Request	Section II. case summary section - Suggest adding a line with \$ under Support amount/frequency as many states require/need separate entries for current support and arrears payments in the Case Summary section to match the order and/or Letter of Transmittal Requesting Registration which provides separate information for the current obligation and arrears obligation.	Summary Information	We Disagree. Decision: This is only meant to be a summary and not a reflection of the entire order. The instructions direct you to check the order.
17	08/15/19	IN	Child Support Enforcement Transmittal #1 - Initial Request	Options under Section 1 Action should be modified to account for guidance issued by OCSE under AT 17-07. A caseworker could use the #5 “Other” to request payments flow through the ordering state, but it would be a lengthy request to fit in the space provided. We recognize that a caseworker may use a Transmittal # 3 to request payment forwarding, but since the Transmittal #1 is an initial request used to establish a connection to another state, it seems like a more appropriate place.	Other	We Disagree. Decision: The Transmittal #1 is not designed as an initial request to establish a connection to another state. It is only used to open a new case.

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
18	08/15/19	IN	Child Support Enforcement Transmittal #1 - Initial Request	The following sentence on page 2 of the instructions should be removed: "If certified copies are needed, hard copies should also be sent by mail." PIQ 18-01 clarified that original documents transmitted electronically may not be excluded from evidence on an objection based solely on the means of transmission. [Note that this sentence is repeated in every document's instructions.]	Certified Copies	We Agree. Decision: See Comment 13a.
19	08/15/19	IN	Child Support Enforcement Transmittal #1 - Initial Request	The following on page 4 of the instructions should be clarified: "Attach two copies of the order(s), including one certified copy, which you are asking the responding jurisdiction to enforce." Electronically transmitted documents do not need "copies". Since electronic transmission is being encouraged, it would be helpful to clarify that this instruction refers to cases being forwarded by regular mail.	Copies of Documents	We agree. Decision: We have clarified in the instructions box that two copies are only required if "sending by mail" and added a sentence that only one certified copy is necessary when sending by EDE. The revised instruction reads: "If sending by mail, attach two copies of the order(s), including one certified copy, which you are asking the responding jurisdiction to enforce. Send only one certified copy, if sending by EDE. Refer to the order for additional information such as effective dates, arrears payment amount, and frequency of payments."
20	07/29/19	ND	Child Support Enforcement Transmittal #1 - Initial Request Acknowledgment	We ask that consideration be given to additionally removing the language on page 1 in the footer of the form which states "Return This to the Initiating Jurisdiction" and the language on page 2 of the instructions following "ACKNOWLEDGMENT:" which states "Return this form to the initiating jurisdiction".	Return to Initiating Jurisdiction	We agree. Decision: We will remove the language "Return this form to the initiating jurisdiction"
21	08/19/19	ERICSA	Child Support Enforcement Transmittal #1 – Initial Request	On the Form, Section VII, add as #5 "Other Orders Regarding Family". Some states are using the "Other Attachments" mostly for this reason, and there is limited space to describe "other"; could remove "other" or keep it as #6.	Other Orders	We disagree. Decision: Any explanation can be added in Other Pertinent Information. The burden for changing the form outweighs the benefit of implementing the change.

#	Date Submitted	Submitted By	Form	Comment	Category	Response
22	08/19/19	ERICSA	Child Support Enforcement Transmittal #1 – Initial Request	On the Form, Section 1.3, would like "modify" as an option; in the alternative, use instructions to state that "modify and close" refers to closing the action to modify, and the responding state should not close any other related IV-D case upon this selection.	Modify and Close	<p>We agree. We agree that clarification is needed. Decision: Under Section 1. Action, we will change Item 3.C on the form to read: 3.C. <input type="checkbox"/> Modify then close this intergovernmental IV-D case We will change Item 4.C on the form to read: 4.C. <input type="checkbox"/> Register, modify, then close this intergovernmental IV-D case. We will change the instructions accordingly to read:</p> <p>Check item 3C "Modify then close this intergovernmental IV-D case" to modify the support order and then close the IV-D case because additional services are not needed in this intergovernmental case. If you select this action, you are not requesting enforcement or the forwarding of payments. Do not check this box if you want the responding jurisdiction to also enforce the modified order.</p> <p>Check item 4C. "Register, modify, then close this intergovernmental IV-D case" to register, modify, and then close the IV-D case because additional services are not needed in this intergovernmental case. If you select this action, you are not requesting enforcement or the forwarding of payments. Do not check this box if you want the responding jurisdiction to also enforce the modified order.</p>
23	08/19/19	ERICSA	Child Support Enforcement Transmittal #1 – Initial Request	On Instructions, Section 1, Box 3, need clarification by defining new terms with old terminology.	New Term with Old Terminology	<p>We do not understand the comment given the explanation in the text box: "This action is used when the initiating agency asserts that the person/entity entitled to receive child support payments has changed from the person/entity designated in the existing support order due to a change in custody or foster care status. Some IV-D agencies have administrative authority to make the change; in other jurisdictions, a court action is required. The initiating agency should confer with the responding IV-D agency to determine what documentation or pleading is required for the responding jurisdiction to consider the requested action." Decision: No change.</p>

#	Date Submitted	Submitted By	Form	Comment	Category	Response
24	08/19/19	ERICSA	Child Support Enforcement Transmittal #1 – Initial Request	On Instructions, there is nothing on the Transmittal #1 that allows for the initiating state to request a modification of a previously registered order. There is not a consensus on whether a state needs to re-register an order for modification purposes. Clarity should be in the instructions.	Modification	<p>We agree that clarity is needed but disagree that Transmittal #1 is the appropriate form for requesting modification of a previously registered order when there is an existing intergovernmental case between the initiating and responding state.</p> <p>Decision: We are changing Transmittal #2, which is the appropriate form for communication between states in an existing intergovernmental case, to include the following: Under Section I. Case Processing Actions, we will add a new 18, which will read “Modification of the order in an open intergovernmental case. Please advise what pleading or documents are needed.” We will renumber the current “18. Other” as “19.Other.”</p> <p>We will change the instructions accordingly to read: <ul style="list-style-type: none"> • Check item 18 “Modification of the order in an open intergovernmental case” if you are requesting that a jurisdiction modify the order in an open intergovernmental case with you. You may request this action whether you are the initiating or responding jurisdiction in the intergovernmental case. In response, the jurisdiction should return the requested information about any needed pleading or documents. • Check item 19 “Other” for an action that is not listed and describe the action requested in section III. </p>
25	08/19/19	ERICSA	Child Support Enforcement Transmittal #1 – Initial Request	On Instructions, under Section I, 3. E, there is confusion as to when that box should be checked and what is the intent of that box. Or, if there could be further instructions for box 3.A.	Change of Payee	<p>We disagree. There seems to be confusion on change of payee. Instructions seem to be clear. Decision: We will add a question to our policy document on forms (draft AT) to provide further clarification.</p>
26	08/15/19	MO	Child Support Enforcement Transmittal #1 – Initial Request	While we agree with a removal of the parenthetical statement to “return the acknowledgment form” as electronic acknowledgment is readily used today, we suggest a more encompassing statement that includes the two primary methods of return such as “Please acknowledge receipt of the Transmittal #1 via CSENet or by return of the acknowledgement form”. Even though this information is expanded in the instructions, it may be helpful on the actual form.	Training	<p>We disagree. Decision: We do not believe the change to add additional language is necessary. This comment referred to an instruction on the form -- “Return the acknowledgment form” -- that several commenters had found misleading because the responding state can acknowledge receipt electronically without sending back the paper form. We changed the instruction to remove the word “form.” The added detail that the commenter requested is explained in the instructions and is not needed on the form. The use of electronic systems such as CSENet in child support is in flux. Therefore, we do not recommend adding specific instructions about the systems on the form. We will stress this in training.</p>
27	08/15/19	MO	Child Support Enforcement Transmittal #1 – Initial Request	We suggest the addition of a termination of support date and reason field to the Transmittal # I as this information is not always clear when working cases that are initiated for arrears only. We also suggest a field that indicates the date the child(ren) went into foster care or to the care of a non-parent caretaker relative in addition to an end date as this would help clarify the time periods owed.	Summary Information	<p>We disagree. Decision: The Transmittal #1 is intended to be a summary and other information will be on supplemental documents.</p>

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
28	08/15/19	NY	Child Support Enforcement Transmittal #1 – Initial Request	Page 1, Section I. Action, Boxes 3C and 4C “Modify then close the Intergovernmental IV-D case” - NYS OTDA requests consideration of changes to boxes 3C and 4C not addressed in this collection. The introductory paragraph on Instructions for Child Support Transmittal #1 – Initial Request “Purpose of the Form”, and the OCSE training for Transmittal #1 webinar notes, both suggest actions requested using the Transmittal #1 relate to a IV-D intergovernmental case, “commonly referred to as a traditional two-state case.” We have encountered confusion among states when processing requests for Box 3C and Box 4C. Headings for both Actions 3 and 4 request “forward payment to the initiating state’s SDU”, proper for the other available choice boxes which create a two-state case, however both “C” boxes are requesting the IV-D case be closed after the order is modified. Since this option is typically used for requesting modification on behalf of the NCP, often there is already an existing two-state case initiated by the CP’s jurisdiction, that should not be impacted by this request to close. Please consider separating Box 3C and Box 4C into an individual item labeled “Take the following action on NCP’s request then close the intergovernmental IV-D case: Box A. Modify the responding tribunal’s order, Box B. Register and Modify the support order of another state”; with additional instructions as needed.	Modification	We disagree with the suggested change. We agree that the lead-in language about forwarding payments to the initiating jurisdiction’s SDU could be confusing when the request is to close the case after the order is modified. However, the proposed change would be a substantial change to the form based on one comment. To address the comment, we have instead changed the instructions to Boxes 3C and 4C to clarify that payment forwarding is not being requested. See response to Comment #22. When the forms are reviewed again, we will request feedback on the comment’s proposal to have a separate item addressing the two requests related to modification and closure.
29	08/15/19	IN	Child Support Enforcement Transmittal #1 - Initial Request – Acknowledgment	The following sentence on page 2 of the instructions should be removed: “If certified copies are needed, hard copies should also be sent by mail.” PIQ 18-01 clarified that original documents transmitted electronically may not be excluded from evidence on an objection based solely on the means of transmission.	Certified Copies	We Agree. Decision: Refer to Comment #13a.
30	08/15/19	IN	Child Support Enforcement Transmittal #1 - Initial Request	Information in the box at the top paragraph of page 5 of the instructions should be modified as follows: The second to last sentence identifies the “Other” field as item 6. However, on the actual form, the “Other” field is item #5.	Wrong Reference	We agree. Decision: The following comment: “It should then check item 6 “Other” under Section I Action and request that the responding jurisdiction determine the validity of the orders.” should reference item 5 instead of item 6.
31	08/12/19	FL	Child Support Enforcement Transmittal #1 - Initial Request Acknowledgment	The proposed changes are beneficial. Formatting of section “Your case has been forwarded for action to,” appears out of sync with the current version.	Formatting	We agree. Decision: Thank you - we will make sure the formatting is in sync.
32a	08/15/19	NY	Child Support Enforcement Transmittal #1 – Initial Request Instructions	Page 3, Item 3 - Take the following action(s) on responding tribunal’s order and forward payment to the initiating jurisdiction’s SDU: NYS OTDA requests consideration of changes to instructions for Item 3 not addressed in this collection. To clarify, please add “Selecting Action Item 3 encompasses requesting any administrative action needed to have the responding tribunal’s order made payable through the responding state’s SDU (SSA § 466[c][1][E] Change In Payee)”.	Instructions	We disagree. Decision: This instruction assumes that the responding state will take whatever actions it needs to accomplish the requested action. States vary on what steps are necessary and it is not appropriate for the instructions to provide a specific example.
32b	08/20/19	VA	Child Support Enforcement Transmittal #1 – Initial Request	The Division supports the proposed change. The statement in Section I. Action in bold stating to “Please acknowledge receipt of the Transmittal #1.” will be a helpful reminder for Central Registry staff to provide an acknowledgement to initiating agency.	Agreement	Thank you for your comment

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
32c	08/20/19	VA	Child Support Enforcement Transmittal #1 – Acknowledgment	The Division supports the proposed change.	Agreement	Thank you for your comment.
32d		WV	Child Support Enforcement Transmittal #1 - Initial Request	The "Nondisclosure Finding/Affidavit attached" checkbox and verbiage are not prominent on the form. Placing it under the form title, where the reader's attention is drawn to it and making it larger and bold font.	Nondisclosure	We disagree. Decision: We appreciate your comment. OCSE takes non-disclosure very seriously and has highlighted this in several places. We are concerned that moving the checkbox to under the form title may not accomplish making it more prominent.
33	08/12/19	FL	Child Support Enforcement Transmittal #2 - Subsequent Actions	The proposed changes are beneficial.	Agreement	Thank you for your comment.
34	08/15/19	IN	Child Support Enforcement Transmittal #2 - Subsequent Actions	On page 2 under "From Responding Agency", #4, we suggest adding reference to the 60-day timeframe to the following sentence: "The responding agency intends to close its IV-D intergovernmental case [in 60 days] on _____ (mm/dd/yyyy) because your agency failed to provide _____." This will provide clarification for caseworkers who may not know that #4 is the notice that is referenced under "From Responding Agency", #5.	60-Day Timeframe	We disagree. This may be a training topic. Decision: The instructions are clear.
35a	08/15/19	IN	Child Support Enforcement Transmittal #2 - Subsequent Actions	The following sentence on page 2 of the instructions should be removed: "If certified copies are needed, hard copies should also be sent by mail." PIQ 18-01 clarified that original documents transmitted electronically may not be excluded from evidence on an objection based solely on the means of transmission.	Certified Copies	We agree. Decision: See comment # 13a.

#	Date Submitted	Submitted By	Form	Comment	Category	Response
35b	08/20/19	CT	Child Support Enforcement Transmittal #2 - Subsequent Actions	<p>Proposed Revisions to Transmittal #2</p> <p>Connecticut suggests that Section 1 Case Processing Actions: Box 10 be changed to remove any reference to tax refund offset or federal collection and enforcement. Connecticut proposes that box 10 be changed from/to:</p> <p>10. [] Notice of case receiving direct payments in the amount of: _____, which were received on _____ and disbursed on _____. Please ensure proper credit is provided.</p> <ul style="list-style-type: none"> • This proposed change eliminates the creation of federal tax information (FTI) and the subsequent need to safeguard. States are required to notify other states of any "direct payments" or receipts, including but not limited to tax return offsets, so that the other state IV-D agency can properly credit the respective system. • This proposal also adds space for IV-D agencies to insert the full amount of the "direct payments" thereby notifying the other agency of the proper credit. • The addition of "received" and "disbursed" date fields helps communicate additional details so that the proper and on-time credit is given. 	Tax Refund Offset	<p>We disagree.</p> <p>Decision: The notice requirement for FTRO is regulatory (45 CFR 285.1(d)(2) and 285.3(c)(6)); therefore it is appropriate as an action on the T2. Information about FTRO collection amounts may be included in section III or attached; see the added instructions to action 10. Finally, information about other types of payments received, which CT calls "direct payments," may be included under item 7 "payment history" or item 12 "Other." See the added instruction to action 12. We have also made one edit for clarity, to change the verb tense under the instructions for item 10 to indicate the case "has received" a tax refund offset, rather than "is receiving."</p> <p>Changes to form instructions: Check item 10 "Notice of case receiving tax refund offset from federal collection and enforcement program" if you are providing notice that the case-is-receiving-has received a tax refund offset from a federal collection and enforcement program. Include payment information as an attachment or under Section III. Other Pertinent Information. If checked, the initiating and responding agencies need to take appropriate measures to safeguard the information.</p> <p>Check item 12 "Other" if you are providing information other than the types listed. For example, this could include changes in contact details; an affidavit of direct payment amounts received; or other types of direct payments, such as lottery winnings, received for a case. Describe the information in section III.</p>
35c	09/04/19	WV	Child Support Enforcement Transmittal #2 - Subsequent Actions	The "Nondisclosure Finding/Affidavit attached" checkbox and verbiage are not prominent on the form. Placing it under the form title, where the reader's attention is drawn to it and making it larger and bold font.	Nondisclosure Finding/Affidavit Checkbox	<p>We disagree.</p> <p>Decision: See comment 32d</p>
36	08/20/19	VA	Child Support Enforcement Transmittal #3 - Request for Assistance/Discovery	The proposed changes are beneficial. Instructions page 1 - Form name at top of page is missing hyphen.	Formatting	<p>We agree.</p> <p>Decision: We will add the hyphen.</p>
37	08/15/19	MO	Child Support Enforcement Transmittal #3 - Request for Assistance/Discovery	We do not support the addition of the Remittance ID information now found in field 11(a) on the Transmittal #3. We do not currently capture the Remittance ID therefore programming changes would be necessary in our state to capture and include Remittance ID information for payment processing. In addition, IWO generation is automatic in our state. Would our state be expected to suppress IWO enforcement on a direct withholding enforcement action, send the Transmittal #3 to obtain the issuing order state's Remittance ID and wait for its return so we could include it on the IWO to the employer? This would not fall within the federal requirement to issue an income withholding order within two business days.	Remittance ID	<p>We disagree.</p> <p>The Remittance ID would be the one used by the SDU to accurately process payments and appears on the Income Withholding Order. The Transmittal #3 instructions are clear on this.</p> <p>See AT 17-07 on page 8 under Q&A 2 - Direct Income Withholding. Under the Intergovernmental regulation States have additional time to receive necessary information from another state before sending a direct income withholding request.</p> <p>Decision: No change</p>

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
38	08/15/19	MO	Child Support Enforcement Transmittal #3 - Request for Assistance/Discovery	Though we do not agree with the Remittance ID revision, we do have additional concerns regarding the format in which this additional field was added to the form. Rather than listed as (a) and (b) under 11 regarding the Remittance ID and payment forwarding, we feel these should be listed as separate numbers, with the previous payment forwarding kept as field 11 and the new remittance ID provision (if kept) added as a new field 12 as they are not necessarily related and should be independently listed. The instructions would require revision accordingly.	Remittance ID	We agree with part of the comment. Decision: Both of the actions 11(b) and 11(a) are required when a state is sending a direct income withholding order on a third state's order – and needs to gather the remittance information from the order state as well as request payment forwarding. However, states can also request payment forwarding as a “stand alone” request. Therefore, we agree with numbering the actions as 11 and 12, rather than 11 a and 11 b. However, we do not agree with changing the order of the actions on the form.
39	08/15/19	MO	Child Support Enforcement Transmittal #3 - Request for Assistance/Discovery	A general suggestion is that sometimes other states request orders or payment records but do not actually use the proper Transmittal #3 process, i.e., the request comes forth via email or phone for information, this usually occurs in expedited situations where an order or payment record is needed urgently. It would be helpful to be able to use the Transmittal #3 Acknowledgment page as the preferred cover response page for these request made outside the process, if permissible.	Transmittal #3 Acknowledgment	Thank you for your comment. Decision: If a state is able to generate the Transmittal #3 Acknowledgment page of the form in the proposed situation, it would be acceptable to use it.
40	8/19/2019	IL	Child Support Enforcement Transmittal #3 - Request for Assistance/Discovery	The changes made to the Transmittal #3 reference AT 17-07, yet they did not address how to communicate with other states when a state exercises the option of direct income withholding pursuant to another state's order when all parties leave the order issuing state and now reside in the same state. In order to correct this issue, we suggest adding a line or a new 12 to the Transmittal #3 to specifically address this situation.	Income Withholding	We disagree. Decision: The commenter is requesting a new and separate field on the Transmittal #3, Request for Assistance/Discovery, that was specific to communication on a particular interstate case processing action, direct income withholding on another state's order. The fields on this form are limited to those actions that are required under the regulation and a few additional, frequent actions. The request to add communication related to direct income withholding on another state's order is not a common action and therefore is not appropriate to add. States can always communicate directly with each other. In this situation, we recommend using the Transmittal #3 to inform the other state and putting the information under checkbox 10 "Other."
41	08/19/19	ERICSA	Child Support Enforcement Transmittal #3 – Request for Assistance/Discovery	On Form, Section 1.11(b), states have trouble with referrals requesting this action; there is an option in some states for payors to pay payees directly with no record or accounting by the SDU. If a state requests only 11(b) relief and it is a "direct pay" order, those states cannot open a IV-D case for this "accounting" purpose; in order for those states to use the SDU, the State would have to open a case for a IV-D core function (mod, enforcement, etc.). A suggestion would be to add language on F or I that states if there is no case in the responding state's SDU, then you must request ENFO or MOD for payments to go through that state's SDU.	Direct Payment	We disagree Decision: We disagree with adding a new action on the form to address payment forwarding in cases with orders where payment is directed to flow between individuals rather than thru a state SDU. However, we have provided clarification in the instructions to the Acknowledgment page: "if the assisting agency does not provide the requested limited service for a reason other than the need for more information, or is unable to forward payments, the assisting agency may use the "Remarks/Response" check box and explain in the provided space." Training will address different scenarios.
42	08/19/19	ERICSA	Child Support Enforcement Transmittal #3 – Request for Assistance/Discovery	Maybe another check box on the acknowledgment that "action cannot be taken due to no payments ordered through the SDU. "	SDU	We disagree Decision: See response to #41.

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
43	08/15/19	IN	Child Support Enforcement Transmittal # 3 – Request for Assistance/Discovery	On page 1 of the instructions, we suggest stronger language be used to indicate that the Child Support Agency Confidential Information Form should be attached.	Attachments	We agree. Decision: See comment #6.
44	08/15/19	IN	Child Support Enforcement Transmittal # 3 – Request for Assistance/Discovery	The following sentence on page 2 of the instructions should be removed: "If certified copies are needed, hard copies should also be sent by mail." PIQ 18-01 clarified that original documents transmitted electronically may not be excluded from evidence on an objection based solely on the means of transmission.	Certified Copies	We agree. Decision: See comment 13 a.
45	08/15/19	IN	Child Support Enforcement Transmittal # 3 – Request for Assistance/Discovery	On page 3 of the instructions, under "Section II. Pertinent Information", the word "be" is missing from the first sentence. The phrase should be edited to read: "additional information that may [be] useful".	Missing Word	We agree. Decision: Correction will be made.
46	08/15/19	IN	Child Support Enforcement Transmittal # 3 – Request for Assistance/Discovery	The instructions under "Check item 11(b)" are not intuitive. The instruction references AT 17-07, yet the option doesn't easily identify itself as a third state option for payment processing. To provide necessary clarification, we suggest that OCSE add third state payment forwarding to the Transmittal #1- Initial Request.	Direct Payment	We disagree. Decision: The Transmittal #1 is used to request that the responding state open a 2-state interstate case. Payment forward is a request to forward payments only without opening a 2-state case.
47	07/26/19	CO	Child Support Enforcement Transmittal # 3 – Request for Assistance/Discovery	Make the Child Support Agency Confidential Information Form a required form when sending a Transmittal #3. Since we often receive these on cases where we have never had a IV-D case (especially for requests of copies of court orders/payment records), there is no identifying information on the Transmittal #3 (other than names). This makes it very difficult and time consuming to determine if we have the requested information.	Attachments	We agree. Decision: See comment # 6.
48	07/29/19	ND	Child Support Enforcement Transmittal # 3 – Request for Assistance/Discovery	We oppose that portion of item 3 set forth in the Summary of Proposed Changes for this form, which removes the requirement that the "Payment Locator Code" be provided by the requesting agency, We ask that the form retain the requirement under Section I, item 1 1(b), that the requesting agency provide the Payment Locator Code, in addition to the SDU Name, SDU Address, and Remittance ID. Retaining this requirement serves a dual purpose: first, it provides an extra level of clarity for the assisting agency when determining where to send payments; and second, it eases system operation and promotes efficiency by providing the assisting agency the information necessary to search for the payment location by code (which is how the automated system is driven in North Dakota), as opposed to limiting the readily available information to SDU name and address.	Payment Locator Code	We disagree Decision: The payment locator code information is already provided at the top of the form in the fields "Requesting Locator Code" and "State". Repeating this information in another field is redundant. Training issue to ensure states are completing the header information.
49a	07/30/19	UT	Child Support Enforcement Transmittal # 3 – Request for Assistance/ Discovery Instructions	Section I., twelfth bullet - "Check" is bold but all the other bullets do not have that word in bold.	Formatting	We Agree Decision: the "Check" was unbolded.

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
49b	08/20/19	VA	Child Support Enforcement Transmittal # 3 – Request for Assistance/ Discovery Instructions	The Division supports the proposed change. Instructions clearly explain new item 11(a) and revised item 11(b). The referencing of OCSE AT-17-07 for additional information will be very helpful for staff. We suggest that under Section I. Action: The requesting agency asks for the following required limited service(s) that an option is added to request a copy of the paternity order and/or acknowledgement of paternity.	Attachments	Thank you for your comment. Decision: We disagree with the suggestion to add language to the form. These items can be requested under #10.
49c	09/04/19	WV	Child Support Enforcement Transmittal # 3 – Request for Assistance/ Discovery Instructions	The "Nondisclosure Finding/Affidavit attached" checkbox and verbiage are not prominent on the form. Placing it under the form title, where the reader's attention is drawn to it and making it larger and bold font.	Nondisclosure Finding/Affidavit Checkbox	We disagree. Decision: See comment 32d.

#	Date Submitted	Submitted By	Form	Comment	Category	Response
49d	09/23/19	IA	Child Support Enforcement Transmittal # 3 – Request for Assistance/ Discovery Instructions	Must a state make initial attempts to serve process itself before it makes a limited service request for service of process? The instructions for item 2 are unclear and need clarification.	Process	<p>We agree. Response: Child Support Enforcement Transmittal #3 – Request for Assistance/Discovery is the appropriate intergovernmental form for making a request for a limited service under 45 CFR 303.7(a)(8). A worker would check item 2 to request assistance with service of process. The instructions for item 2 of Transmittal #3 suggest the possibility of direct contact with an official in the other jurisdiction. It then states the following: “Send the request for assistance/discovery on the CSE Transmittal #3 only if such attempts have been unsuccessful.” There are no federal requirements that a state must first attempt service of process itself before sending another IV-D agency a request under 45 CFR 303.7(a)(8) for the limited service of service of process. The sentence “Send the request . . . only if such attempts have been unsuccessful” refers to the immediately preceding sentence. In other words, if the requesting state IV-D agency has tried to directly contact the sheriff in another agency to request service of process in the other jurisdiction, the requesting agency should send Transmittal #3 only if such an attempt has been unsuccessful. The purpose of the instruction is to avoid confusion and duplicated effort if the requesting agency made direct contact and then sent the form asking the requested agency to also make contact. OCSE agrees that the wording of this instruction needs clarification.</p> <p>We will clarify the instructions to read: Check item 2 “Assistance with service of process” if you want assistance with service of process. Although not required, you may directly contact (via telephone, fax, or other means) the sheriff or other appropriate official in another agency to request personal service of process in the other jurisdiction. In that event, send the request for assistance/discovery on the CSE Transmittal #3 only if such attempts have been unsuccessful. Attach such documentation as necessary for service of process.</p>
50	08/15/19	MO	Child Support Locate Request	The information added regarding international locate requests is helpful and important. Should some type of general informational statement be added to the other intergovernmental form instructions, perhaps a boxed statement referring to the OCSE international webpage for form resources when working with FRCs or Hague Convention countries?	International References	<p>We disagree. Decision: This can be addressed in training.</p>

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
51	07/30/19	UT	Child Support Locate Request	Also, in the "Instructions for the Child Support Locate Request" it contains the following: "This form includes information that may pose a significant risk to an individual if made available in a public forum or inappropriately disclosed. This form should not be filed or included in a record available to the general public." Should similar language be included in the "Instructions for Child Support Agency Confidential Information Form" and the "Instructions for Letter of Transmittal Requesting Registration" (and other similar forms)?	Terminology	We disagree. Decision: Similar but not identical language is included on other forms. Each form has cautionary language based on the particular form. Instructions to the Child Support Locate Request are slightly different, due to the fact that this form probably would not be filed with a tribunal. This is an instance where the wording of the current instruction isn't an inconsistency but appropriate given the form.
52	08/12/19	FL	Child Support Locate Request	The proposed changes are beneficial.	Agreement	Thank you for your comment.
53	08/15/19	IN	Child Support Locate Request	The following sentence on page 2 of the instructions should be removed: "If certified copies are needed, hard copies should also be sent by mail." PIQ 18-01 clarified that original documents transmitted electronically may not be excluded from evidence on an objection based solely on the means of transmission.	Certified Copies	We agree. Decision: See comment # 13a.
54	08/15/19	NY	Child Support Locate Request – Instructions	Page 1, Purpose of the Form: NYS OTDA notes the inclusion of guidance under Purpose of the Form regarding the lack of a recommended Hague Convention locate form, the possible use of the "U.S. locate form," and the removal of language concerning the development of such a form by the federal Office of Child Support Enforcement (OCSE). The instructions reference the OCSE international website as a source of information about working cases under the Hague Convention. However, it is not readily apparent which of the many listed website resources contains information regarding locate requests and whether a Hague Convention Country will accept the U.S. locate form. At a minimum, NYS OTDA recommends the inclusion of a link to the International page of the OCSE website. NYS OTDA also believes it would be helpful to identify the specific locate request resources available on the OCSE website.	Hague form reference	We agree Decision: The link to the OCSE International page will be added to the instructions.
55a	07/11/19	MN	Child Support Locate Request Instructions	Add instructions that tell caseworkers how to find out if their state has a CSENet agreement with another state	CSENet	We disagree This information can be found on the portal. Decision: This is a training issue.
55b	08/20/19	VA	Child Support Locate Request Instructions	The Division supports the proposed change. The revision provides clarity of how it may be used in international locate situations.	Agreement	Thank you for your comment.
56	07/29/19	ND	Declaration in Support of Establishing Parentage	We noted that the footer on page 1 of the instructions was missing, which typically identifies the title of the document and the page number.	Formatting	We agree. Decision: The instruction block was hiding the footer on Page 1. We moved the box to page 2 and the problem (delete the "s") was resolved,
57	08/12/19	FL	Declaration in Support of Establishing Parentage	Changes regarding protecting sensitive information and adding the Pub. L. 104-13 are beneficial (changes 2 and 5 in the changes summary)	Agreement	Thank you for your comment.

#	Date Submitted	Submitted By	Form	Comment	Category	Response
58	08/12/19	FL	Declaration in Support of Establishing Parentage	<p>Adding signature lines in Section V to allow a representative of the agency to sign raises the following concerns:</p> <ul style="list-style-type: none"> The declarative statement under Section V should be revised to address when a nonparent caregiver is the petitioner. The statement says petitioner agrees to 'submit myself and, if I am the custodian, the child to genetic testing...' Nonparent caregivers only submit the child for genetic testing, not themselves. The declarative statement is inaccurate when the agency representative signs the form. A separate declarative statement should be available that states why the agency representative is completing and signing the form instead of the parent. 	Signature Lines	<p>Note: Several commenters agreed with the proposed change to add the signature line for the Agency Representative to the Declaration in Support of Establishing Parentage.</p> <p>Decision: With regard to the first comment, the form is clear that testing is only done as necessary. If the nonparent caregiver is a relative and the parent is not available, it may be necessary to include the relative caregiver in genetic testing.</p> <p>With regard to the second comment, we disagree that the declarative statement is inaccurate when an Agency Representative signs the form. As noted on the form, the declarant is stating that the facts are true to the best of the person's knowledge and belief. However, to clarify when an Agency Representative should sign the form, changes will be made as follows: On the face of the form we will insert an "or" between the signature lines.</p> <p>In the instructions for Section 1 before "If you checked other", we will insert "An agency or tribunal representative (such as a Foster Care or IV-D agency worker) may complete and sign the form if no parent or custodian is available or cooperative."</p> <p>Under Section V before "By this signature", we will insert "An agency or tribunal representative (such as a Foster Care or IV-D agency worker) may complete and sign the form if no parent or custodian is available or cooperative." Also change "the individual petitioner and/or agency or tribunal representative" to be "the individual petitioner or agency or tribunal representative."</p>
59	08/12/19	FL	Declaration in Support of Establishing Parentage	<p>For future consideration:</p> <ul style="list-style-type: none"> Create a separate declaration to be used in same sex or surrogacy cases as the information needed is different than what is listed on the existing declaration, for example, questions about how conception occurred and whether both partners consented. 	Same sex or Surrogacy declaration	<p>We disagree.</p> <p>Decision: This change is unnecessary. In Section I, the form notes the following: "If #3 is not applicable, please provide all pertinent information regarding the conception of the child in section IV."). And instructions to Section I provide: "Complete the form to the extent you have information."</p>
60	08/14/19	RI	Declaration in Support of Establishing Parentage	<p>RIGL 15-8-11 on parentage testing requires that the application for testing be supported by sworn affidavit which must include a statement alleging paternity and setting forth facts establishing a reasonable possibility of sexual contact during the probable period of conception. We do not see how a IV-D representative is going to be able to testify in affidavit as to those facts. The statute does go on to allow our agency to administratively order testing if the alleged father provides an affidavit denying paternity</p>	Signature	<p>We disagree.</p> <p>Decision: If this is a Foster Care case, the FC or IV-D worker should be able to sign the declaration as the public authority in situations where the other party is not available or not cooperative. See comment #58. We also note that 42 USC 666(a)(5)(B) does not limit the availability of genetic testing but rather specifically requires it in certain circumstances.</p>

#	Date Submitted	Submitted By	Form	Comment	Category	Response
61	08/14/19	RI	Declaration in Support of Establishing Parentage	RIGL 15-8-16 "Civil Action" provides that "the mother of the child and the alleged father are competent to testify." If the Declaration is to provide evidence to establish paternity of a child, it appears that the statute is looking for testimony from these parties first.	Signature	We agree Decision: See comment #58. We agree with this comment that the parents should provide testimony if possible. However, there are many situations where a parent is not available or cooperative and this should not preclude establishment of parentage for the child. States have varying laws and procedures regarding the establishment of parentage. The Declaration in Support of Establishing Parentage is meant to ensure the tribunal has information regarding parentage, including in situations when a parent is not present to testify.
62	08/14/19	RI	Declaration in Support of Establishing Parentage	RIGL 15-8-22 "False declaration of identity" provides that the making of a false complaint as to the identity of the father or the aiding or abetting in the making of a false complaint is punishable by the same penalty as for perjury.	Signature	Thank you for your comment. Decision: Alleging that a party is the parent of a child, when later genetic tests exclude the party as a parent, is not the same as "making a false complaint," which requires an intentional misrepresentation.
63	08/14/19	RI	Declaration in Support of Establishing Parentage	Based on these statutory provisions, we believe that having a IV-D representative sign the Declaration is not appropriate. If there is a foster care agency that then has custody of the child or the TANF agency, at least those agencies are responsible for the support of the child and therefore have an arguable role in establishing paternity. Absent those circumstances, we believe under RI law, we would need a mother or father to execute the Declaration.	Signature	We disagree. Decision: See comment #58. If the child is in Foster Care or on TANF, the IV-D agency is charged with establishing parentage for the child. If you interpret your law to prohibit an agency representative from signing the declaration in other cases, there is nothing requiring completion of the form by an agency representative. The form permits completion by an agency representative; it does not require it. Other commenters have been supportive of the change.
64	08/15/19	IN	Declaration in Support Of Establishing Parentage	This form should be reformatted and made clearer who should fill out each section. Having them as self-contained sections within the form would be more helpful.	Self-contained Sections	We disagree. Decision: The form is already in sections, for example, there is a section to be completed by the birth mother only. Because there are different situations and parties who might be completing the form, it would be difficult to make further division into sections work in all situations.

#	Date Submitted	Submitted By	Form	Comment	Category	Response
65	08/15/19	IN	Declaration in Support Of Establishing Parentage	We suggest adding more language to the form to differentiate when it's proper to fill out (1) or (2). This section has proven to be very confusing to caseworkers in training. Perhaps using some of the language contained within the instructions e.g., Section II. To Be Completed by the Petitioner if Alleging the Other Party is the Parent and To be Completed by the Petitioner Alleging Himself/Herself to be the Parent.	Who completes the sections	We disagree. However, we have made the following changes to provide more clarity to Section II. In the header at the top of page 4, we will include the same parenthetical, (complete either 1 or 2, as appropriate), along with "(continued)" to mirror the language used in the Section II header after the checkbox number 1. The header at the top of page 4 will read: Section II. To Be Completed by the Petitioner (complete either 1 or 2, as appropriate) (Continued): In the instructions, we will add "Alternatively" at the beginning of the third sentence (see highlight.) The instructions will read as follows. Section II. To Be Completed by the Petitioner (complete either 1 or 2, as appropriate): This section must be completed by the person named as the petitioner in the related Uniform Support Petition. Check the box next to "1" if you are asserting that the respondent is the parent of the child named in the related petition. Alternatively , check the box next to "2" if you are asserting that you are the parent of this child and are seeking to establish your legal relationship to the child. Check only one of the boxes. If you checked the box next to "1," complete items 1a through 1n.
66	08/15/19	IN	Declaration in Support Of Establishing Parentage	We note that the form is not very clear as to how a caretaker or petitioner who is not a parent should fill out this form and there are very few opportunities for them to mark that the information is not known.	Who completes the sections	We agree. Decision: Above Section I of the form in the box that states "A SEPARATE DECLARATION IS REQUIRED FOR EACH CHILD NEEDING PARENTAGE ESTABLISHED." add the sentence from the instructions : "Complete the declaration to the extent that you have the information." This will also be covered in training .
67	08/15/19	IN	Declaration in Support Of Establishing Parentage	The signature field should be able to be completed by the petitioner or the Agency or Tribunal Representative as on other forms, i.e. the General Testimony.	Signature	Thank you for your comment in support of the proposed change.
68	08/15/19	IN	Declaration in Support Of Establishing Parentage	We suggest clarifying what appears to be conflicting information in the instructions' Purpose of the Form section. It says that separate declarations are not needed for multiples (e.g., twins, triplets). However, the form states a separate form is needed per child. Since multiples may have different paternity, this sentence needs to be removed or qualified.	Conflicting instructions on multiples	We agree. Decision: Though the instructions do not specifically state that a separate form is not necessary in cases with multiple births, that sentence does imply it. We will remove the following sentence: "This is necessary since the circumstances surrounding conception and birth will differ unless the children were born at the same time (e.g., twins, triplets). "
69	08/15/19	IN	Declaration in Support Of Establishing Parentage	The following sentence on page 2 of the instructions should be removed: "If certified copies are needed, hard copies should also be sent by mail." PIQ 18-01 clarified that original documents transmitted electronically may not be excluded from evidence on an objection based solely on the means of transmission.	Certified Copies	We agree. Decision: See Comment 13a.

#	Date Submitted	Submitted By	Form	Comment	Category	Response
70	08/15/19	MO	Declaration in Support of Establishing Parentage	We are very supportive of the revision of the declaration signature section to allow an agency representative or tribunal to sign the form as it will meet the needs of all case constructs and will make this form consistent with the General Testimony signature section, which is preferable.	Agreement	Thank you for your comment.
71	08/15/19	NY	Declaration in Support of Establishing Parentage/Uniform Support Petition	Form, Page 5, Section V. Declaration: NYS OTDA supports the addition of a signature line for an Agency Representative in Section V. Declaration. However, NYS OTDA requests clarification regarding when a "Tribunal Representative" would utilize this form. It is our understanding this change was made for purposes of consistency with the General Testimony, Section XI. Declaration. NYS OTDA respectfully notes, however, that the Uniform Support Petition, Section V. Declaration, also differs, allowing for the signature of the Petitioner, IV-D Representative, or the Petitioner's Private Attorney.	Signature	Thank you for your comment. Decision: We have added language to clarify when a tribunal representative would sign the declaration. See comment #58. This form was changed to mirror the declaration section of the General Testimony due to the receipt of many comments on this form. Both the Declaration and the General Testimony include types of testimony. In contrast, the Uniform Support Petition is an initial pleading. We have had no requests to change the signature section on the Uniform Support Petition, so will not be changing that form at this time.

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
72	08/19/19	MA	Declaration in Support of Establishing Parentage	<p>Revision to Signature Section - The proposed change to allow an agency or tribunal representative to sign the Declaration in Support of Establishing Parentage will prevent the responding agency from using the Declaration as the basis for establishing paternity. The stated intention of the change is to bring the Declaration in line with the General Testimony form, but the Declaration requires information that an agency or tribunal representative would have no personal knowledge of and, therefore, could not attest to.</p> <p>Federal law requires states to have statutes setting out the process for establishing paternity; among the requirements each state must include in its statute is a provision for genetic marker testing. The GMT must be based on a sworn statement by a party setting out the requisite sexual contact between the parties. 42 U.S.C. § 666(a)(5). As mandated, Massachusetts law requires "[a]n affidavit by the mother or the putative father alleging that sexual intercourse between the mother and the putative father occurred during the probable period of conception" for a court to order GMT. M.G.L. c. 209C, § 17. A similar affidavit is required for DOR to issue an administrative GMT order. M.G.L. c. 119A, § 3A.</p> <p>Massachusetts courts are strict on what evidence is sufficient to obtain a GMT order and will not issue such an order without the required affidavit or testimony from the mother or putative father. On occasions where the parties submitted to GMT voluntarily, courts have declined to admit the test results into evidence without the affidavit or testimony to serve as a foundation.</p> <p>Allowing an agency or tribunal representative to sign the Declaration will only create unnecessary delay and additional work for the responding state. The representative would not have personal knowledge of facts sufficient to serve as the basis for GMT or establishing paternity.</p> <p>Instead of being able to rely on the Declaration, the responding state would need to contact the initiating state to obtain an affidavit that meets the legal requirements for GMT.</p> <p>For these reasons, we suggest that the signature line for an agency or tribunal representative not be added to the Declaration in Support of Establishing Parentage.</p>	Signature	<p>We disagree.</p> <p>Decision: The majority of comments we received have been supportive of the change. Both the General Testimony and Declaration in Support of Establishing Parentage provide testimony that may be admissible in a proceeding; for that reason the signature line on the forms are now similar. By providing a signature line for an agency representative, the forms can be used in cases in which the child is in Foster Care or with a caretaker and the parent is not available or will not cooperate in completing the affidavit. There must be a means to establish parentage in those situations. The instructions to Section I of the form make clear that "[i]nformation is to be completed or furnished by a parent of the child" and that the person completing the Declaration should do so "to the extent you have information." We also note that 42 USC 666(a)(5)(B) does not limit the availability of genetic testing but rather specifically requires it in certain circumstances. See associated changes made to the form in comment #58.</p>
73	08/19/19	ERICSA	Declaration in Support of Establishing Parentage	<p>For the Form, there is a concern with caseworkers signing a declaration to information that they have no personal knowledge of. Revise the structure of the existing form to take into consideration cases where there either is a Caretaker, or a Caretaker-Agency involved. The feeling is that a lot of the questions on the Declaration could not be completed by those parties. So, some IV-D workers skip completion of the form altogether or do not complete it in whole. Which in turn causes responding states to reject the whole petition because not all the required documents are attached.</p>	Signature	<p>We disagree.</p> <p>Decision: The instructions direct the person completing the form to "Complete the form to the extent that you have the information". We are adding that statement to the face of the form. This is a required form if parentage needs to be determined. The responding state should not reject the petition if this form is not included, but should request the document and process the case to the extent possible.</p> <p>See revisions to the form in comment #66.</p>

#	Date Submitted	Submitted By	Form	Comment	Category	Response
74	08/19/19	IL	Declaration in Support of Establishing Parentage	Illinois is a fact-based pleading state. Generally, the party attesting to sexual intercourse in a paternity action is one of the biological parents. If another party is attempting to attest to the conception of the child, it is based on information and belief and hearsay and is not a fact as they were not present with the biological parents at the time of conception. A nonbiological parent, grandmother, grandfather, child support representative, a foster care worker, etc., could not attest under penalty of perjury to the sexual intercourse between the biological parents, the exclusivity of the relationship between the biological parents, or other intimate details presumably known only to the biological parents. If a nonbiological parent or entity were to attest to sexual intercourse between the biological parents, a challenge could occur (and has occurred in Illinois) regarding the actual knowledge and legal validity of what the nonbiological parent or entity has stated.	Hearsay Information	We disagree. Decision: The person completing the form does so to "the extent the information is known". The IV-D agency is responsible for attempting to establish parentage in all cases in which parentage establishment is needed, including foster care and caretaker cases. Section II of the Declaration, which must be completed by the Petitioner, allows the petitioner to check "not applicable" or "Don't know" to certain statements. Reference comment #66. We cannot address requirements of Illinois law.
75	08/19/19	IL	Declaration in Support of Establishing Parentage	If it is the opinion of OCSE that the form should remain in its current state allowing another party to attest to the conception and parentage of the child, it would seem that an option for "Don't Know" or "Not applicable" should be added to section II., 1., c., d., e., f., g., h., i., k., l., m., n.	Hearsay Information	We disagree Decision: This statement from the instructions "Complete the form to the extent that you have the information" will be added to the face of the form. See comment #66. Also, the new proposed instruction under section I, item 1 provide additional clarity: "If you checked "Other," also explain in section IV the basis for your responses in sections I and II." Regarding the "don't know" and "not applicable" fields on the form, we did not receive other comments and will not be making this change.

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
76	08/19/19	MO - Prosecuting Attorney	Declaration in Support of Establishing Parentage	<p>Thank you for the new forms that address the need for the agency to sign this form. Generally, the declaration affidavit is written at too high of a comprehension level; the form is not friendly to lay people. Also, the Declaration has some statements and some questions. I think choosing the same format would be preferable. We appreciate the new forms that make it more clear to allow a representative of an agency to use the form, it still does not address all of the awkwardness of that form when doing so. For example, I don't believe that the agency representative can speak to the question regarding conception or pregnancy, nor could they comment on biology unless genetic test results were attached. It also is not totally necessary to have the agency rep skip all the way to Section IV, because that person could make statements about the birth certificate or a voluntary acknowledgment (as with any state record.) The document is also awkward for an alleged father, non-parent custodial relative, or other caretaker not the birth mother. Therefore, we recommend offering three versions of this document for each of these scenarios: applicant birth mother, applicant alleged parent, applicant agency (for a non-cooperative bio mother, foster-care case, or other petitioner who is not the bio mother.) Some states send the forms to the applicant to fill out on their own and from the answers given, the applicant clearly did not understand the question. IN THE ALTERNATIVE to three versions, we would request that the document be amended to first identify the declarant, and then limit the portions of the form that s/he should answer based on the relationship to the case. Coming from a state that will rebut the marriage presumption more easily than some, I would like to add a part 7 under the presumptions that addresses whether there is a judgment of non-paternity for the child. With some frequency, we send outgoing UIFSA referrals to a state with jurisdiction over the alleged father because we have already obtained a judgment of non-paternity over the presumed father. Having a section here is more clear than handwriting that information in as other pertinent information in a later section. Please see the tabs below (Declaration and Birth Mother and cp, Declaration Alleged Parent, and Declaration Agency-Other.) for more specific feedback for this form as part of our new proposed versions.</p>	Hearsay Information	<p>We disagree. Decision: The creation of different versions of the form or addition of new sections would cause an unnecessary workload on states in terms of systems programming. We will provide training to address questions states may have about completion of the form, and encourage states to provide parents with the form instructions and to assist them, as needed, with completion of the form. Reference comment 75 above which addresses part of the comment.</p>
77	08/12/19	NH	Declaration in Support of Establishing Parentage	<p>NH is in support of the proposed change to include a signature line for the IV-D agency representative. This signature line is needed in circumstances when the petitioner is non-cooperative and BCSS can gather, or has already received, information to file as part of the application. The signature line is also needed for a IV-E case with NH's child welfare agency, and in cases with motherless draws.</p>	Signatures	<p>Thank you for your comment.</p>
78	08/15/19	NY	Declaration in Support of Establishing Parentage - Instructions	<p>Page 2, Section I. Declaration: NYS OTDA appreciates the additional examples and further instructions provided in Section I. Declaration. The revisions provide needed clarification and promote correct completion of the form.</p>	Agreement	<p>Thank you for your comment.</p>

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
79a	07/30/19	UT	Declaration in Support of Establishing Parentage Instructions	Other forms that contain "This form contains sensitive information - do not file this form in a public access file" have the same language contained in the instructions. (See "Instructions for General Testimony"). This form does not. Is there a reason for the inconsistency?	Consistent Language	We agree. Decision: We will add this languauge to the instructions for consistency.
79b	08/20/19	VA	Declaration in Support of Establishing Parentage	The Division supports the proposed change. Signature requirements should be consistent with the General Testimony which allows it to be signed by IV-D agency worker or parent since this form is often used in concurrently with the General Testimony.	Agreement	Thank you for your comment.
80a	08/14/19	RI	Declaration in Support of Establishing Parentage Uniform Support Petition General Testimony	RIGL 15-8-2 provides for paternity to be determined "upon the complaint of the father, mother, the child, or the public authority charged with the support of the child." If a case is a TANF case, the IV-D agency representative would meet this threshold. However, if not a TANF case, there isn't a public authority charged with the support of the child and the IV-D representative would have no standing to so sign the Declaration (as well as the Uniform Petition and the General Testimony).	Signatures	We disagree. Decision: If the child is on TANF or in Foster Care, the IV-D representative must attempt to establish parentage, if needed, and could sign the declaration as the public authority. See comment #58 and comment #66. The form is designed so that either an agency representative or a party may sign the Declaration. It does not require the agency representative to sign the form. We cannot address requirements of Rhode Island law.
80b	08/14/19	RI	Declaration in Support of Establishing Parentage	There are a number of provisions in Rhode Island law that point to the conclusion that a IV-D representative is not a sufficient substitute for a parent on the Declaration.	Signature	We disagree. Decision: See comment 80a.
80c	09/04/19	WV	Declaration in Support of Establishing Parentage	The "Nondisclosure Finding/Affidavit attached" checkbox and verbiage are not prominent on the form. Placing it under the form title, where the reader's attention is drawn to it and making it larger and bold font.	Nondisclosure Finding/Affidavit Checkbox	We disagree. Decision: See comment 32d.
81	07/30/19	NJ	General	There will also be a training component for child support staff which will require our office to develop a plan and training materials.	Training	We agree. Decision: When the revised forms are approved by OMB and finalized, OCSE will provide training materials."
83	08/15/19	NY	General	Generally, NYS OTDA notes significant clarifications have been added to several of the instruction documents. These clarifications will promote understanding, resulting in streamlined case preparation and processing. To this end, NYS OTDA recommends highlighting significant clarifications to instructions in the policy document announcing the release of the revised standard intergovernmental forms.	Agreement	We agree. Decision: We will provide a summary of the changes in the Action Transmittal, make track changes versions available to states upon request, and will provide training on the revised forms.
84	8/19.2019	MO - Prosecuting Attorney	General	Please add the functionality on the OCSE website to download all the forms at the same time, in addition to individually.	OCSE Website	We agree that such functionality would increase efficiency. Decision: We will consult with our web team to see if this is possible.
85	07/30/19	NJ	General	Implementation time would be needed based on the amount of system modification necessary.	Implementation Time	We agree Decision: We may need to adjust the effective date appropriately.
86	07/26/19	CO	General Testimony	Although there are no proposed changes to this form, we would suggest the DOB of each child and the place of birth be added. This would put all needed information in one place and caseworkers would not have to search multiple documents for it.	Child's DOB Child's Place of Birth	We disagree. Decision: This was intentionally removed from the form to protect PII. This is on the Child Support Agency Confidential Information Form and Personal Information Form for UIFSA Section 311.

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
87	08/15/19	IN	General Testimony	We suggest adding an additional section on the form under Section I, E- References for information on the "non-party parent" as it is likely needed by the responding jurisdiction for the child support obligation calculation. "Unknown" should be an option for the other parent's financial information.	Non-party Parent	We disagree. Decision: Instructions say to provide information on the non-party parent in Section IX. If the information is unknown that can also be noted in Section IX.
88	08/15/19	IN	General Testimony	We suggest additional answer to Section V, B4(a) on page 6. "N/A or Not applicable". If the petitioner has coverage, the question does not apply. Another option would be to skip to question B5.	Page 6 - Section V, B4(a)	We disagree. Decision: The instructions for Section V, B4(a) provide the following: "Item 4: If the petitioner does not have health care coverage or coverage is through Medicaid, check the appropriate box to indicate if the petitioner has employer-sponsored coverage available to self (item 4.a) and/or child(ren) listed in section IV (item 4.b)." The instructions are clear that one would not check any box in Section V, B(4) if the condition precedent is not present; in other words, if the petitioner has coverage, there is no need to answer this section.
89	08/15/19	IN	General Testimony	The following sentence on page 2 of the instructions should be removed: "If certified copies are needed, hard copies should also be sent by mail." PIQ 18-01 clarified that original documents transmitted electronically may not be excluded from evidence on an objection based solely on the means of transmission.	Certified Copies	We agree. Decision: See comment 13 a.
90	08/15/19	MO	General Testimony	Though there were no changes to the General Testimony in this request for comments, we offer the suggestion that the instructions clarify that out-of-pocket child care expenses information is needed. Parties are including state-subsidized child care amounts in the child care expense field. If there are states that do want the total child care expense (both out-of-pocket and state subsidized), we suggest the form and/or instructions be adapted to meet this need.	Clarify Out-of-Pocket Expenses	We agree. Decision: We have added fields to the form to capture the petitioner's out-of-pocket and state-paid child care costs for IV.A.3, IV.B.3, and IV.C.3 as well the total amount. The instructions for Section IV, item 3, have been changed to "Provide the total amount of child care paid on a monthly basis for this child, if applicable. In addition, indicate the amounts paid by the state and the out-of-pocket costs paid by the petitioner." This breakdown may be important for state guideline calculations of the obligor's support obligation.
91a	8/19.2019	MO - Prosecuting Attorney	General Testimony	Generally, the feedback we receive it that this form is very long and burdensome for the applicant. I think the information requested is appropriate, so the only thing I can think of to address the length of the form is to reorganize it. I do not know if there has been a study of the number of children on an UIFSA case, but in the absence of data to suggest the correct median amount, I would recommend having spots for two children. Next, I would recommend a form that is expedited for a custodial parent, with cp and children on Medicaid, and with very little information about the other parent. The extra information about the petitioner's other children, tax status, health insurance, Respondent's other children, etc. would be specific attachments so only needed if there's information to share. In our office, the cs professional would have or help with determining whether the form would be sufficient or whether or not any attachments would be needed. This would make it easier to review for the applicant and the responding state.	General Testimony Length	We disagree. Decision: Sections for four children have been standardized across all forms in order to include the majority of cases and reduce the need for additional documents for additional children. We disagree with the recommendation to create a new expedited form for a situation in which the party completing the form has little information on the other parent. The cost to states to make needed system changes would outweigh any benefit. Also, unless the questions are asked, there would be no way to know if the party had the information.

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
91b	09/04/19	WV	General Testimony	The "Nondisclosure Finding/Affidavit attached" checkbox and verbiage are not prominent on the form. Placing it under the form title, where the reader's attention is drawn to it and making it larger and bold font.	Nondisclosure Finding/Affidavit Checkbox	We disagree. Decision: See comment 32d.
92	08/15/19	NY	General Testimony – Instructions	Page 10, Section XI. Declaration: With reference to the above comment concerning the Declaration in Support of Establishing Parentage – Form, NYS OTDA requests clarification regarding the inclusion of a reference to "tribunal representative" in Section XI. Declaration.	Tribunal Representative	Thank you for your comment. The General Testimony has always had a "tribunal representative" as an allowable signature on the face of the form. In the proposed forms, we only added in "tribunal representative" to the instructions because reference to this had been missing. However, in response to comments and for consistency with the Declaration, we have made changes to the form and instructions as reflected in comment 58.
93	07/30/19	UT	General Testimony Instructions	Section V., Part C., Item 4. - There is an extra period in the last sentence ("skip to part D.."). (See the Item 5 where it references "part D.". Same section, Item 6.. second sentence - There should be a period after "6.a". (See the next sentence where it references item 6.b.)	Formatting	We agree. Decision: We will update these sections.
94a	08/12/19	FL	General Testimony Instructions	The proposed changes are beneficial.	Agreement	Thank you for your comment.
94b	08/20/19	GA	General Testimony Instructions	he Division supports the proposed change.	Agreement	Thank you for your comment.
95	07/26/19	CO	Letter of Transmittal Requesting Registration	Suggestion to put language regarding the petition being signed and dated (both on the form and in the instructions) in bold. We often receive these documents unsigned so highlighting this requirement may help.	Signatures	We disagree. Decision: Many of the forms have Declaration sections requiring a signature and date. It should be obvious that this should be completed. We can stress this in training.
96	08/12/19	NH	Letter of Transmittal Requesting Registration	NH appreciates the personal information safeguards that the Office of Child Support Enforcement (OCSE) introduced with its consolidation of personal information into the "Child Support Agency Confidential Information Form" and "Personal Information Form for UIFSA § 311" with the 2016 form revisions. NH is concerned, however, that the "Letter of Transmittal Requesting Registration" continues to require the NCP's sensitive information, namely the SSN field. NH recommends that either <ul style="list-style-type: none"> the SSN field be removed, since IV-D agencies will already have provided that information on the "Child Support Agency Confidential Information Form", which is required to accompany the form, or the instructions be revised to indicate that completion of the NCP SSN field is optional when the form is submitted by the IV-D agency along with the "Child Support Agency Confidential Information Form". 	Safeguarding Information on Registration	We disagree Decision: The Letter of Transmittal Requesting Registration is required by UIFSA when a party wants to register a support order or an income withholding order in another state. The information on the form is that required by Section 602 of UIFSA. We note that this form may be used in both IV-D and non-IV-D cases. It is therefore insufficient for the required SSN information to only be provided in the Child Support Agency Confidential Information Form.

#	Date Submitted	Submitted By	Form	Comment	Category	Response
97	08/12/19	FL	Letter of Transmittal Requesting Registration	The proposed changes are beneficial. For future consideration: • Remove from the form and instructions "attach documentation of TANF time periods" as this is not required by UIFSA to register an order. 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." Requiring additional documentation not required by the act is burdensome and delays registration when the responding state insists on having the missing documentation. TANF time periods have no bearing on registration; the nonregistering party can contest the validity of arrears owed, not how they are distributed.	TANF time periods	We disagree. Decision: Although the comment is correct that UIFSA does not require the information, the information is useful to the responding state in determining what arrears are owed to the State and what arrears are owed to a parent. If a state agency is only registering the order for enforcement of arrears owed to the State, having information about the time period of TANF will help ensure that the tribunal notes that in its determination of arrears and does not foreclose the ability of a custodial parent to seek arrears owed to the parent. Such timeframes can also impact the responding state's financial record keeping, especially if enforcing other arrears for the custodial party, arrears due to the responding state or any other state.
98	08/15/19	IN	Letter of Transmittal Requesting Registration	We suggest adding the Personal Information Form for UIFSA § 311 as a required document when sending this form. We understand that not all states/jurisdictions judicially register orders, however, not sending this form can result in a delay for those that do.	Required Documents	We disagree. Decision: Section 311 specifically requires a petition only when "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 foreign country." This is a training issue.
99	08/15/19	IN	Letter of Transmittal Requesting Registration	We are unclear why the Transmittal #1 Initial Request form is specifically listed as required in support of this document, in light of the fact that several other documents require a Transmittal # 1 to carry out the requested action but do not similarly list the Transmittal # 1 as required.	Required Documents	Thank you for your question. Decision: To avoid the confusion that IV-D agencies may have with use of the word "transmittal" in the form title, we added the instruction on the form to ensure they knew that a Child Support Enforcement Transmittal #1 was still required when opening an intergovernmental IV-D case to request registration. In response to the comment, we revised the instruction on the face of the form and in the instructions to read: "To open an intergovernmental IV-D case, attach a Transmittal #1 and Child Support Agency Confidential Information Form."
100	08/15/19	IN	Letter of Transmittal Requesting Registration	The following statement in the middle of page 1 of the instructions should be moved up above the boxes: "If this is a IV-D case, the Transmittal #1 and the Child Support Agency Confidential Information Form must be attached."	Required Documents	We agree. Decision: This change would make the instructions more consistent with other forms. Move this on top of the three boxes.
101	08/15/19	IN	Letter of Transmittal Requesting Registration	The following sentence on page 2 of the instructions should be removed: "If certified copies are needed, hard copies should also be sent by mail." PIQ 18-01 clarified that original documents transmitted electronically may not be excluded from evidence on an objection based solely on the means of transmission.	Certified Copies	We agree. Decision: See comment 13 a.

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
102	08/19/19	MA	Letter of Transmittal Requesting Registration	Section III - While not a proposed change, DOR would like to raise our privacy and data security concerns with having a data field for the obligor's Social Security number in Section III of the Letter of Transmittal Requesting Registration. Any IV-D case will provide this information as part of the Child Support Agency Confidential Information Form. DOR is unaware of the added benefit of requiring the field in the Letter of Transmittal and is concerned that it may result in inadvertent disclosure. Given that it is in an easily-overlooked place, the data field invites human error and unintentional disclosure-particularly as every state has different and potentially incompatible redaction rules. For this reason, we recommend that OSCE consider removing the obligor's Social Security number in Section III of the Letter of Transmittal Requesting Registration.	Safeguarding Information on Registration	We disagree. Decision: See comment 96.
103a	8/19.2019	MO - Prosecuting Attorney	Letter of Transmittal Requesting Registration	Section 1 . Case Summary: the "assigned arrears only:" we think this section is not clear on its face, and after reading the instructions, I think the intention is that the worker is to record the total amount of arrears on the "total amount of arrears" space, and if any of the total is assigned, the worker is to put the assigned portion of the total on the "assigned arrears only: " line. It would be more clear to the parties (and to the court, who does not see the instructions) if the language said "Of the total, the amount assigned is \$____" or similar.	Assigned Arrears Only	We disagree with the suggestion, but agree that the instructions are confusing. Decision: We will change the instructions to be "Only complete the "Assigned arrears only" field if you are requesting enforcement of assigned arrears exclusively. In this situation, enter the total amount of assigned arrears and also complete the "Period of Computation" field. Leave the other arrears fields blank. Attach documentation showing the time period that the obligee received TANF."
103b	09/04/19	WV	Letter of Transmittal Requesting Registration	The "Nondisclosure Finding/Affidavit attached" checkbox and verbiage are not prominent on the form. Placing it under the form title, where the reader's attention is drawn to it and making it larger and bold font.	Nondisclosure Finding/Affidavit Checkbox	We disagree. Decision: See comment 32d.
104a	08/15/19	NY	Letter of Transmittal Requesting Registration – Instructions	Page 2, Action, Note Section: NYS OTDA supports the addition of language under the Note section bullet, Nondisclosure Finding/Affidavit attached, as it provides important clarification regarding disclosure and the need for review for special handling.	Agreement	Thank you for your comment.
104b	08/20/19	VA	Letter of Transmittal Requesting Registration – Instructions	The Division supports the proposed change. Instructions, page 2, bullet "Nondisclosure Finding/Affidavit attached" allowing the IV-D agency address to be provided as a substitute address for the protected party will be very helpful as there have been instances where protected address information was almost shared.	Agreement	Thank you for your comment.
105	08/12/19	FL	Notice of Determination of Controlling Order	The proposed changes are beneficial.	Agreement	Thank you for your comment.
106	08/15/19	IN	Notice of Determination of Controlling Order	The following sentence on page 2 of the instructions should be removed: "If certified copies are needed, hard copies should also be sent by mail." PIQ 18-01 clarified that original documents transmitted electronically may not be excluded from evidence on an objection based solely on the means of transmission.	Certified Copies	We agree. Decision: See comment 13a.

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
107a	07/29/19	ND	Notice of Determination of Controlling Order Instructions	Instructions for the Notice of Determination of Controlling Order We noted that the page numbers of the instructions were incorrect on all three pages.	Page Numbering	We agree Decision: The page numbering will be corrected.
107b	08/20/19	VA	Notice of Determination of Controlling Order Instructions	The Division supports the proposed change. The Instructions, page 1: "Purpose of the Form" helps to clarify this, when it must be used, and emphasizes the importance of prohibiting the sharing of a party's personal information.	Agreement	Thank you for your comment.
108	07/26/19	CO	Personal Information Form for UIFSA § 311	Suggestion to move the box for NDI over to the middle or other side of the page. We often receive these documents with staples over that box so we don't know if the box is checked or not unless we remove the staples.	NDI	We agree. Decision: We will Indent the NDI on the top of the form.
109	07/26/19	CO	Personal Information Form for UIFSA § 311	Suggestion to add child's place of birth (city/state).	Child's Place of Birth	We disagree. Decision: The information on this form is limited to information required by section 311 in UIFSA. Information about a child's place of birth is on the Child Support Agency Confidential Information Form. No change to the form.
110a	08/12/19	FL	Personal Information Form for UIFSA § 311	The proposed changes are beneficial.	Agreement	Thank you for your comment.
110b	08/20/19	VA	Personal Information Form for UIFSA § 311	The Division supports the proposed change.	Agreement	Thank you for your comment.
111	08/19/19	ERICSA	Child Support Agency Confidential Information Form	On the Form, page 2, Section III, asks for the child(ren) information: the wording in the section where it states Nonmarital Birth [] yes [] no. If "no" date of marriage and then if "yes" fill out the following on how parentage was established.	Nonmarital Birth	See comment #112.
112	08/19/19	ERICSA	Child Support Agency Confidential Information Form	Not sure if it was done to save space but it would make more sense to state "Child Born of the Marriage [] yes [] no if "yes", date of marriage _____ if "no", complete the following...		We disagree. This language is for conformity with Section 458 of the Social Security Act. Decision: No change.
113	08/15/19	IN	Personal Information Form for UIFSA § 311	The following sentence on page 2 of the instructions should be removed: "If certified copies are needed, hard copies should also be sent by mail." PIQ 18-01 clarified that original documents transmitted electronically may not be excluded from evidence on an objection based solely on the means of transmission.	Certified Copies	We agree. Decision - See comment 13a.
114	08/15/19	IN	Personal Information Form for UIFSA § 311	We note that the instructions include providing the "suffix" in the name fields but the form states the name should be listed as "(first, middle, last)". The instructions should match the form.	Formatting	We agree. Decision: Conform the face of the form to the instructions.
115	08/15/19	IN	Personal Information Form for UIFSA § 311	The last sentence page 2 of the instructions, Section 3. Child(ren) Information should have a quotation in front of "Additional".	Formatting	We agree. Decision: We will add the quotation mark.

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
116	08/15/19	NY	Personal Information Form for UIFSA § 311 Instructions	Page 1, Purpose of the Form: NYS OTDA appreciates the enhanced instructions provided under Purpose of the Form. The additional language concerns the actions to be taken by states whose tribunal records are open to the general public, when the form must be used, and how it must be filed.	Agreement	Thank you for your comment.
117	07/30/19	UT	Personal Information Form for UIFSA § 311 Instructions	Section 2., provision starting "Complete the caretaker" - all the other sections have a colon and then the bullets without periods; but this section has a period and then periods after each bullet. It seems like the sections should be consistent.	Formatting	We agree. Decision: We will remove the periods at the end of the bulleted items. There is no need to add a colon.
118	08/12/19	NH	Personal Information Form for UIFSA § 311 Instructions	NH recommends that the "Personal Information Form for UIFSA § 311" form instructions clarify whether the applicant or IV-D agency should complete the form. NH also suggests that the form include a signature line for the party or IV-D agency representative completing it, since the form's fields are pulled from the "General Testimony", and the "General Testimony" includes a signature line.	Who completes and signature	We disagree. This information is required by UIFSA Section 311 to be within the petition or accompanying documents. There is no requirement in UIFSA to identify who completes the form or for the document to be signed. Decision: No change. Note: the information in the form helps identify the parties and children, but is not the type of information -- such as the General Testimony -- that one would seek to admit into evidence. In that circumstance, UIFSA Section 316 would require them to be signed under penalty of perjury.

#	Date Submitted	Submitted By	Form	Comment	Category	Response
119	08/14/19	IA	Personal Information Form for UIFSA § 311 Instructions	<p>The Iowa CSRU has a few concerns about the requirement that the Personal Information Form for UIFSA § 311 be filed with the petition or pleading in all intergovernmental cases. Essentially, the Iowa CSRU requests the form specify that a state is required to file the Personal Information Form for UIFSA § 311 or any state-required form containing substantially similar information and limitations on disclosure that sufficiently protect the parties' information.</p> <p>First, in Iowa, the courts require the filing of a form that meets the requirements of Iowa Code § 602.6111 and 598.228. CSRU uses the Information Pursuant to §598.228 & 602.6111 Confidential form to meet these requirements. This form contains substantially the same information as the Personal Information Form for UIFSA § 311. The clerk of court is required to keep the sensitive information on the form confidential. The Personal Information Form for UIFSA § 311 would therefore be in large part duplicative of information already required to be filed on a statutorily designated form.</p>	Filing with Petition	<p>We agree.</p> <p>The instructions to the form do not match the language on the face of the form. The instructions currently say "This form must be filed with the tribunal, but should not be filed in a public access file." The instructions on the face of the form do not require filing of the form itself. Rather they require that the information on the form be filed with the petition or pleading.</p> <p>Decision: We will change the instructions to mirror what is on the face of the form: "The information on this form must be filed..."</p> <p>Background: UIFSA is a required state law. Section 311 of UIFSA requires a petition when a petitioner seeks "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." Section 311 then proceeds to list the personally identifying information that must be in the petition or accompanying documents. The Personal Information Form for UIFSA § 311 is an OMB-approved form that provides the information required by Section 311, and must be used by all IV-D agencies. In an intergovernmental IV-D case for establishment, determination of parentage, or modification, the initiating agency must complete the 311 form and send it to the responding agency as part of an interstate case. Once it receives the form, the Iowa CSRU can determine whether to file the form with the tribunal or use the information to complete a state-required form that it files with the tribunal. If the Iowa agency chooses to use the information from the OMB-approved form to complete the separate state form, such action would comply with UIFSA as long as the state form accompanies the UIFSA petition.</p>

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
120	08/14/19	IA	Personal Information Form for UIFSA § 311 Instructions	<p>Second, the Personal Information Form for UIFSA § 311 itself informs clerks that the information on the form "may be disclosed to the parties in the case, unless accompanied by a nondisclosure finding/affidavit." However, in Iowa, there is a specific statutory procedure whereby CSRU may be required to disclose a party's confidential information to an "authorized person" as defined in 42 U.S.C. § 653(c). See Iowa Code § 252B.9A. Requiring the filing of the Personal Information Form for UIFSA § 311 permitting disclosure by the court to any party (absent a nondisclosure finding/affidavit) essentially circumvents the confidentiality protections already established in state and federal law. For example, assume that a custodial parent has a past history of abuse against the noncustodial parent. If the custodial parent desires the noncustodial parent's address, he or she can file a request with CSRU, which will be denied due to a flag on the case arising from the prior family violence. However, if the proposed version of the Personal Information Form for UIFSA § 311 is filed, the custodial parent can bypass CSRU and simply go to the clerk of court to get the address. Since Iowa and most states do not give the payor an opportunity to claim risk before sending a referral, there will not be a nondisclosure affidavit for the payor, which means the clerk will simply release the address to the abusive custodial parent upon request, thereby placing the noncustodial parent at risk of harm.</p>	Family Violence	<p>We disagree. OCSE appreciates your attention to family violence concerns and takes family violence very seriously. The provisions regarding authorized persons under 42 USC 653(c) relate to disclosure of information from the federal parent locator service. In contrast, UIFSA – which is a required state law – has provisions related to information that must be provided to a tribunal. The language on the Personal Information Form for UIFSA § 311 was intentionally chosen to comply with the language in UIFSA Section 311. It requires that the UIFSA petition or accompanying documents must contain certain listed personal information unless Section 312 Nondisclosure of Information in Exceptional Circumstances applies. A nondisclosure finding/affidavit meets the requirements of Section 312. The presence of a Family Violence Indicator on the state system, alone, does not. Section 312 can apply to either party.</p> <p>Decision: No change.</p> <p>See comments in #119.</p>
121	08/14/19	IA	Personal Information Form for UIFSA § 311 Instructions	<p>Third, the form includes the parties' social security numbers. By the terms of the form itself, this information may be disclosed to the parties. Iowa has had some previous case complaints because one party obtained the other party's SSN and used it fraudulently. Current procedure in Iowa is that when the information is needed for legitimate purposes (e.g., an SSN is needed to obtain health insurance coverage), the parties can voluntarily exchange the information or the court can ultimately determine the necessity for the information. The clerk should not, without any standards, simply provide the information upon request.</p>	Nondisclosure	<p>We disagree. Absent compliance with Section 312 Nondisclosure of Information in Exceptional Circumstances, UIFSA Section 311 requires that the petition or accompanying documents provide SSNs.</p> <p>Decision: No change.</p>

Final Intergovernmental Forms Comments

December 11, 2019

#	Date Submitted	Submitted By	Form	Comment	Category	Response
122	08/14/19	IA	Personal Information Form for UIFSA § 311 Instructions	Lastly, Iowa court rules specify that, in order to limit access to a filed document, a filer must file an application and obtain an order that restricts access. For a Personal Information Form for UIFSA § 311 where there is no non-disclosure affidavit, CSRU would need to apply to the court for an order that restricts access so that the information is not accessible to the public. For a Personal Information Form for UIFSA § 311 with an accompanying nondisclosure affidavit, CSRU would need to apply to the court for an order that sets access restrictions at the highest level. While such an application and order would not be overly time-consuming in a single case, the additional time expenditure in the aggregate could significantly reduce the time available to attorneys and workers dedicated to actual case activities. By using the already mandated Information Pursuant to § 598.228 & 602.6111 Confidential form, the information is already protected without the necessity of filing an application to restrict access. Further, a parent seeking release of the other parent's confidential information would still be able to do so through CSRU or the courts using the statutory process set forth in Iowa law.	Nondisclosure	We agree. As described in response to comment 119, we agree that UIFSA section 311 does not require a state agency to file the form itself with the tribunal, but rather the agency must file the information on the form with the tribunal. If the Iowa agency chooses to use the information from the OMB-approved form to complete the separate state form, such action would comply with UIFSA as long as the state form accompanies the UIFSA petition. We have revised the instructions to match what is on the face of the form to clarify that the responding state must file the information on the form with the tribunal, rather than the form itself. See also comment 120.
123	08/14/19	IA	Personal Information Form for UIFSA § 311 Instructions	If our first recommendation is not implemented, we suggest removing the proposed change to the instructions saying the Personal Information Form for UIFSA § 311 "must be filed."	Nondisclosure	We agree. Decision: We will change the instructions to be consistent with the language on the face of the form. See comment 119.
124	08/15/19	NY	Personal Information Form for UIFSA § 311 Instructions	Page 1, This Form Contains Sensitive Information – Do Not File this Form in a Public Access File: NYS OTDA supports the replacement of "tribunal" with the more descriptive "petition or pleading" under This Form Contains Sensitive Information – Do Not File this Form in a Public Access File.	Agreement	Thank you for your comment.
125	08/12/19	FL	Request for Change of Support Payment Location Pursuant to UIFSA § 319	The proposed changes are beneficial. For future consideration: • Add tribal locator coding information, similar to other forms, for example: Tribal IV-D programs may choose to use the federal Intergovernmental forms. However, they are not required to use or accept such forms. If you have any questions, contact the tribal IV-D agency directly using the contact information on the OCSE website. Where forms request a Locator code, note that tribal Locator codes uniquely identify tribal cases with "9" in the first position, 0 (zero) in the second position, and then a 3-character tribal code defined by the Bureau of Indian Affairs (BIA).	Tribal Locator Code	Thank you for your comment. Decision: We believe this is a training issue. We do not have Tribal locator codes on the other forms. Tribal codes can be entered in the appropriate locator code fields already on the form.
126	08/15/19	MO	Request for Change of Support Payment Location Pursuant to UIFSA 319	We have not received a valid Change of Support Payment Location request since this new intergovernmental form was implemented. We have received several that were invalid and did not meet the criteria and others where the form was included with an enforcement Transmittal #1 packet. Confusion still seems to exist regarding this form!	Opinion	Thank you for your comment. This is a training issue.

#	Date Submitted	Submitted By	Form	Comment	Category	Response
127	07/30/19	UT	Response to the Child Support Agency Request for Change of Support Payment Location Pursuant to UIFSA § 319	Should this form also include the language "The information on this form may be disclosed as authorized by law."?	Consistent Language	We disagree. The form does contain the language "The information on this form may be disclosed as authorized by law" because the form is only for use between IV-D agencies. Decision: No change.
128a	07/30/19	UT	Response to the Child Support Agency Request for Change of Support Payment Location Pursuant to UIFSA § 319 Instructions	"Purpose of the Form" section - It seems like there should be a line between the first paragraph and the second.	Formatting	We agree. Decision: The spacing will be corrected.
128b	08/20/19	VA	Response to the Child Support Agency Request for Change of Support Payment Location Pursuant to UIFSA § 319	The Division supports the proposed change.	Agreement	Thank you for your comment.
128c	09/04/19	WV	Response to the Child Support Agency Request for Change of Support Payment Location Pursuant to UIFSA § 319	The "Nondisclosure Finding/Affidavit attached" checkbox and verbiage are not prominent on the form. Placing it under the form title, where the reader's attention is drawn to it and making it larger and bold font.	Nondisclosure Finding/Affidavit Checkbox	We disagree. Decision: See comment 32d.
129	08/12/19	FL	Uniform Support Petition	The proposed changes are beneficial.	Agreement	Thank you for your comment.
130	08/15/19	IN	Uniform Support Petition	The following sentence on page 2 of the instructions should be removed: "If certified copies are needed, hard copies should also be sent by mail." PIQ 18-01 clarified that original documents transmitted electronically may not be excluded from evidence on an objection based solely on the means of transmission.	Instructions	We agree. Decision: See comment 13a.
131	08/15/19	IN	Uniform Support Petition	Note that the Servicemembers Civil Relief Act website address should be changed in the instructions to: https://scra-w.dmdc.osd.mil/scra/#/home .	Website Change	We agree. Decision: We will update the URL.

#	Date Submitted	Submitted By	Form	Comment	Category	Response
132	08/19/19	IL	Uniform Support Petition	Illinois is a fact-based pleading state. Generally, the party attesting to sexual intercourse in a paternity action is one of the biological parents. If another party is attempting to attest to the conception of the child, it is based on information and belief and hearsay and is not a fact as they were not present with the biological parents at the time of conception. A nonbiological parent, grandmother, grandfather, child support representative, a foster care worker, etc., could not attest under penalty of perjury to the sexual intercourse between the biological parents, the exclusivity of the relationship between the biological parents, or other intimate details presumably known only to the biological parents. If a nonbiological parent or entity were to attest to sexual intercourse between the biological parents, a challenge could occur (and has occurred in Illinois) regarding the actual knowledge and legal validity of what the nonbiological parent or entity has stated.	Signatures	We disagree. Decision: See comment #74.
133	08/19/19	IL	Uniform Support Petition	It is our opinion that the signatory for the USP should be the same as the person who signed any underlying document, as multiple signatories could prove problematic in any contested case.	Signatures	We agree. Decision: Now that agency representative has been added to the the Declaration in Support of Establishing Parentage, this should be less of an issue. No change needed to the form.
134	8/19.2019	MO - Prosecuting Attorney	Uniform Support Petition	In Section 1, Action: would like to add clarifying options under "Establishment of an order for:" regarding retroactive child support to be turned into 3 options: 1) judgment for retroactive current child support back to the date of filing or service of this action, or otherwise provided by your law 2) judgment for past support provided by the State of (initiating State), not to exceed \$ _____, as provided by your state's law; 3) judgment of past necessary support expended by the Petitioner, in the amount of \$ _____, or as provided by your state's law In Section III, the link has changed, so it could be updated for the Servicemembers Civil Relief Act. In Section IV. Other Pertinent Information: add options for 1) Documentation of TANF benefits expended by the State of _____ and 2) Documentation of past necessary expenses expended by Petitioner to go with the expanded types of retroactive support suggested above.	Retroactive Child Support	We disagree and agree. Decision: We disagree - the responding state will follow their laws in terms of establishing retroactive support. In Section III regarding the URL we agree - see comment #131. Section IV-- We disagree. These specific additions are unnecessary. The responding state can request additional documentation, if needed.
135	08/20/19	VA	Uniform Support Petition	The Division supports the proposed change. The update to the Instructions, Section V. Declaration will be a helpful tool when training new caseworkers on interstate cases.	Agreement	Thank you for your comment.

Who We Are--Springfield Regional Prosecutors' Child Support Office, (SRPCSO) Greene County, Springfield, Missouri

These comments are coming from frontline workers in a prosecuting attorney's office (3 county regional office) in Missouri. We handle referrals for only cases associated to our counties and in these actions: 1) the establishment of paternity and / or support or 3) to register a foreign order for modification in the responding state. We do not send the forms to the applicant to fill out (if they reside here). If the applicant is local to us, we meet with that person for an interview to get the information and complete the forms where appropriate. Also, we are the office that acts as the responding state for our three counties and takes actions on other states for enforcement. So, we initiate or respond to almost every action contemplated. The only actions we do not initiate or respond to are (we do not fill out form).

How the forms are created

The frontline staff in this Office is required by the MO IV-D agency, the Family Support Division (FSD), to use the state automated system (MACSS) to create the forms. The forms that are the only forms from MACSS that our staff use. MACSS is not our case management system, and we have only access to the narrative notes and print these forms. MACSS is still on the original green screen, and the merging of the forms requires staff to enter information already in MACSS. It is a very frustrating process, and the keying in of information already in MACSS is tedious. However, the policy is to use the forms from MACSS. MACSS are automatically updated when the merge function of these UIFSA forms is used. I believe that the information created in the recording of the action taken, but also sets up the CSENet functionality. I could be wrong.

Limitations of the MACSS forms

When MACSS creates the forms, it automatically prints the forms on paper and does not create or save an editable electronic form before they are printed. Hence, the finished product is a combination of printed and handwritten information. We use the MACSS forms and update with handwritten information by us than if we immediately recycle the printed MACSS forms on the OCSE webpage. We only run into problems when the responding state rejects handwritten forms.

Why we are commenting

We think it is important for OCSE to hear from the frontline staff some of the issues we have not only with other jurisdictions but also in our own state that are an impediment to getting the work completed in a legally correct and efficient manner. All comments are in the documents.

Collateral consequences of UIFSA cases being inefficient or frustrating to work

Parents frequently are frustrated by UIFSA cases. Action is delayed by the referral process to us from the IV-D state agency. And unluckiest of all, the responding state rejects the entire packet instead of requesting more information for the referral. The fact that you have so many partners in the process, and partners from so many different places with different requirements makes it tricky. UIFSA cases typically cause low morale for child support professionals. It takes a special person to work in the IV-D world a better place, And on a bad day, it really takes a special person to keep plowing forward when it feels like you are in a place where no one cares. So, as the leader here, I want to give the staff as many tools as possible to make the work more manageable. We need to keep staff in place that are trained and competent in this work. It is the most difficult work this office does for no one. We need for ideas for efficiency that resonate with our experience.

Understanding about Automated Systems

I do not want to make unreasonable demands on states to update their automated systems to make our proposed change a condition of the MACSS forms and understand the limitations that FSD has in getting new forms or changes to existing forms. I would like that FSD let us accomplish the MACSS updates without merging the forms, and then I could use the .pdfs and create templates and at the very least, give my staff an electronic copy that can be edited before printing. To date, that has not been worked out.

Thank you!

We appreciate your time and consideration of our comments.

Declaration in Support of Establishing Parentage by Birth Mother	
Section	Current Section
boxed instructions	"Do not complete ..."
Section 1	"declare under penalty of perjury"
1.1	
3	Note:
4.a	"The following facts support a presumption of parentage:
4.b.	remove

4.c	change
5	change
6	change
7	add
Section II.2	remove
III	no change
IV	no change
V	"Under penalty of perjury...."

New / Comment
change to "Do not complete this form if there is an order of parentage or an executed and unrescinded voluntary acknowledgment of parentage.
add "am the birth mother of the child named below
delete the "check one" and boxes; go directly to boxed section; no changes
"If the child was not conceived by sexual intercourse between you and the other parent, please add to section IV below a description of the conception including the method of conception, if there were any legal contracts with donors of reproductive cells, and if the conception required medical doctors in a medical facility."
<p>New section: "Check the box beside any statement below that is true"</p> <ol style="list-style-type: none"> 1. I was married to the Respondent at the time the child named above was conceived. 2. I was married to the Respondent at the time the child named above was born. 3. The child named above was born within 300 days of my divorce from Respondent. 4. I was married to another person, not the Respondent, at the time of the conception of this child. 5. I was married to another person, not the Respondent, at the time of the birth of this child, or this child was born within 300 days of divorcing the other person, not the Respondent. 6. The person I was married to that created a presumption of parentage as stated above is (first, middle, last name), address, whose date of birth is, gender is 7. The marriage referred to above began on xxx and 1) there is not divorce or 2) a divorce has been filed on x date in X County, State but is not final, or 3) the divorce was final and filed on x date in X County, State. A copy of the decree is attached.
I don't think this creates a presumption of paternity in any jurisdiction; it may help with an evidentiary hearing for the best interests of a child when there is a presumed and an alleged parent, so if it should remain, perhaps take it from the list of presumptions and include it on this form in Section II.1

The child named above, the Respondent in this action, and I participated in genetic testing to show paternity. Those test results show a probability of paternity of _____%.

The child named above, a person named _____, not the Respondent in this action, and I participated in genetic testing to show paternity. Those test results show a probability of paternity of _____%.

A copy of the genetic testing report is attached.

1. There is no other parent listed on the birth certificate of the child named above besides me.
2. There is another parent listed on the birth certificate of the child named above besides me. That person's name is , address, gender.
3. A copy of the birth certificate of the child listed above is attached.

A voluntary acknowledgment of paternity was executed, but later rescinded, by _____ name , address, gender.

1. There is a court order that ordered a person not to be the other parent of the child named above. That person's name is ...address, gender.
2. A copy of that order is attached.

remove ", if I am the custodian,"

Declaration in Support of Establishing Parentage by Self-Alleged Parent	
Section	Current Section
boxed instructions	"Do not complete ...
Section 1.1	no change to check boxes; change to text box
3	Note:
4.a	"The following facts support a presumption of parentage:
4.b.	remove
4.c	change

5	change
6	change
7	add
Section II.1	remove
Section II.2	no change
III	remove
IV	no change
V	no change

New / Comment

change to "Do not complete this form if there is an order of parentage or **an executed and unrescinded** voluntary acknowledgment of parentage.

add "unknown" to conception date, location, and full term pregnancy

"NOTE: If the child was not conceived by sexual intercourse with you and the birth mother, but was conceived by sexual intercourse, please state the name of the man, if known; if the child was not conceived by sexual intercourse, please add to section IV below a description of the conception including the method of conception, if there were any legal contracts with donors of reproductive cells, and if the conception required medical doctors in a medical facility."

New section: "Check the box beside any statement below that is true"

1. I was married to the birth mother at the time the child named above was conceived.
2. I was married to the birth mother at the time the child named above was born.
3. The child named above was born within 300 days of a divorce between the birth mother and me.
4. The marriage referred to above began on xxx and 1) there is not divorce or 2) a divorce has been filed on x date in X County, State but is not final, or 3) the divorce was final and filed on x date in X County, State. A copy of the decree is attached.

I don't think this creates a presumption of paternity in any jurisdiction; it may help with an evidentiary hearing for the best interests of a child when there is a presumed and an alleged parent, so if it should remain, perhaps take it from the list of presumptions and include it on this form in Section II.2

The child named above and I participated in genetic testing to show paternity. Those test results show a probability of paternity of _____%.

The child named above and a person named _____ participated in genetic testing to show paternity. Those test results show a probability of paternity of _____%.

A copy of the genetic testing report is attached.
(This language is intentional, because it is highly likely that if genetic testing has been completed with these facts, then it was done with a motherless draw.)

1. I have not seen a copy of the birth certificate of the child named above.
2. The birth certificate of the child named above shows the legal parents as the birth mother and me.
2. There is no other parent listed on the birth certificate of the child named above besides the birth mother.
2. There is another parent listed on the birth certificate of the child named above besides the birth mother. That person's name is _____, address _____, gender _____.
3. A copy of the birth certificate of the child listed above is attached.

A voluntary acknowledgment of paternity was executed, but later rescinded, by name _____, address _____, gender _____.

1. There is a court order that ordered a person not to be the other parent of the child named above. That person's name is _____, address _____, gender _____.
2. A copy of that order is attached.

Declaration in Support of Establishing Parentage by Agency/Other	
Section	Current Section
boxed instructions	"Do not complete ..."
Section 1	"declare under penalty of perjury"
1.1	
1.2	remove
3	remove
4.a	"The following facts support a presumption of parentage:"

4.b.	remove
4.c	change
5	change
6	change
7	add

Section II	remove and replace with
III	remove
IV	no change
V	"Under penalty of perjury...."

New/Comment
change to "Do not complete this form if there is an order of parentage or an executed and unrescinded voluntary acknowledgment of parentage.
no change
<p>"check one"</p> <ol style="list-style-type: none"> 1. I am a representative of the county or state IV-D agency where the child listed below resides. 2. I am a representative of the county or state IV-E agency where the child listed below is in custody. 3. I am a representative of an agency not IV-D or IV-E. (Explain agency relationship to the child in section IV.)" 4. I am a legal guardian or custodial relative, not a biological parent. <p>REMOVE ALL REFERENCE TO GENDER In the text box, keep only the name of the child and whether the birth certificate is attached.</p>
<p>New section: "Check the box beside any statement below that you have documentation to show as true"</p> <ol style="list-style-type: none"> 1. The birth mother was married to the Respondent at the time the child named above was conceived. 2. The birth mother was married to the Respondent at the time the child named above was born. 3. The child named above was born within 300 days of a divorce between the birth mother and the Respondent. 4. The birth mother was married to another person, not the Respondent, at the time of the conception of this child. 5. The birth mother was married to another person, not the Respondent, at the time of the birth of this child, or this child was born within 300 days of divorcing the other person, not the Respondent. 6. The person the birth mother was married to that created a presumption of parentage as stated above is (first, middle, last name), address, whose date of birth is, gender is 7. The marriage referred to above began on xxx and 1) there is not divorce or 2) a divorce has been filed on x date in X County, State but is not final, or 3) the divorce was final and filed on x date in X County, State. A copy of the decree is attached.

I don't think this creates a presumption of paternity in any jurisdiction; the agency rep most likely will not have this personal information, but could if the person was involved in the foster care case and the agency rep was from the IV-E agency and had personal knowledge. If you wanted to keep it for that reason, I would move it from out under the list of legal presumptions of paternity.

The child named above and the respondent in this action participated in genetic testing to show paternity. Those test results show a probability of paternity of _____%.

The child named above and a person named _____, not a party to this case, participated in genetic testing to show paternity. Those test results show a probability of paternity of _____%.

A copy of the genetic testing report is attached.

(This language is intentional, because it is highly likely that if genetic testing has been completed with these facts, then it was done with a motherless draw.)

1. There is no other parent listed on the birth certificate of the child named above besides the birth mother.
2. There is another parent listed on the birth certificate of the child named above besides the birth mother. That person's name is _____, address _____, gender _____.
3. A copy of the birth certificate of the child listed above is attached.

A voluntary acknowledgment of paternity was executed, but later rescinded, by _____ name, address, gender.

A copy of the rescindment is attached.

1. There is a court order that ordered a person not to be the other parent of the child named above. That person's name is _____, address _____, gender _____.
2. A copy of that order is attached.

Allegations of Paternity

1. The birth mother has alleged in writing another person as the parent of the child named above. A copy of that document is attached. Name of document:

_____ Name of the Agency that created the form: _____

(NOTE: I could see how it may be relevant to keep a form of Section II.2 for the legal custodian/NPCR to answer, e.g., I lived with the birth mother at the time of pregnancy or after the birth of this child. The birth mother told me that the father of this child is the named Respondent. I was present at the birth of the child, and I saw the Respondent present there, too. The Respondent made statements to me that made me believe that Respondent claims to be the parent of this child. The Respondent has lived in the same household as I with this child. The Respondent has given food, clothing, gifts, or financial support to me for the child or to the child directly with my personal knowledge. The Respondent has visited the child with me present or in my home.)

Amend the second sentence to say: If I am the custodian, I agree to produce the child named above for genetic testing as may be necessary to establish paternity and seek the orders requested in the Uniform Support Petition.