

Intergovernmental Reference Guide (IRG)

**OMB Information Collection Request
0970 – 0209**

Supporting Statement Part A - Justification

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Submitted By:
Office of Child Support Enforcement
Administration for Children and Families
U.S. Department of Health and Human Services

SUPPORTING STATEMENT A – JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

Maintained by the Office of Child Support Enforcement (OCSE), the Intergovernmental Reference Guide (IRG) is a centralized and automated repository of state and tribal profiles that contain essential high-level descriptions of each state and tribal Child Support Enforcement (CSE) program and their respective procedures. Without the IRG, processing intergovernmental child support cases will be more costly and time-consuming because CSE agencies will need to search multiple sources to locate the information necessary to process cases.

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

This request is for a revision of a currently approved information collection. (See A.15 for the revision explanation.)

2. Purpose and Use of the Information Collection

The purpose of the IRG information is to assist with processing intergovernmental child support cases more effectively and efficiently.

3. Use of Improved Information Technology and Burden Reduction

The IRG information is accessible through OCSE's website, which allows state and tribal CSE agencies to update information as changes occur. The IRG not only improves the accuracy of CSE information, but it also reduces time and costs otherwise spent searching for CSE information, thereby reducing delays in case processing.

4. Efforts to Identify Duplication and Use of Similar Information

The IRG is unique. There are no other means available for state and tribal child support agencies that serve as a central source of information to assist with processing intergovernmental child support cases.

5. Impact on Small Businesses or Other Small Entities

There is no impact on small entities.

6. Consequences of Collecting the Information Less Frequently

Timely collection and dissemination of IRG information are vital to ensure that the most comprehensive and current information is available to facilitate the efficient and effective processing of intergovernmental child support cases. Collecting IRG information less frequently will negatively impact case processing and child support collections.

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

Not applicable.

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

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), the Administration for Children and Families published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. A notice published in the Federal Register at 84 FR 65818 on November 29, 2019, which allowed for a 60-day comment period for the public to submit in writing any comments about this information collection.

During the 60-day notice and comment period, nine state and tribal agencies, and the Eastern Regional Interstate Child Support Association, provided comments, which varied from support for the new questions to suggested additions to the new and previously approved state and tribal profile questions. OCSE responded to each commenter to thank them for their input and affirmed that the suggested additions are under review and will be considered as part of a planned workgroup. OCSE plans to convene a workgroup to discuss more robust revisions to the IRG information collection, which would be incorporated prior to the current expiration date of this information collection (January 31, 2022). The goal is to obtain representative input from OCSE partners to streamline the IRG profiles and make the information more usable and easier to find in order to expedite handling of child support cases. This workgroup will review and consider the comments received in response to this request for interim changes. One suggested change – to make all family violence questions

and responses private – was accepted and will be incorporated to protect the state processes.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

The IRG does not contain sensitive case data or personal identifying information; however, it does contain contact information for state and tribal employees. Access to any state and tribal employee’s contact information in the IRG is restricted to authorized state and tribal users.

11. Justification for Sensitive Questions

Not applicable.

12. Estimates of Annualized Burden Hours and Costs

Information Collection Instrument	Total Number of Respondents	Total Number of Responses per Respondent	Average Burden Hour per Response	Annual Burden Hours	Average Hourly Wage	Annual Cost
Intergovernmental Reference Guide: State Profile Guidance	54	18	0.3	291.6	44.48	12,970.37
Intergovernmental Reference Guide: Tribal Profile Guidance	62	18	0.3	334.8	44.48	14,891.90
Estimated Annual Burden Total				626.40	Estimated Annual Cost Total	27,862.27

The job code is 21-1021, with an hourly wage of \$22.24 per hour. The increase in the total annualized costs from the previous approval is due to a slight increase in the hourly wage rate estimate derived from the most current Bureau of Labor Statistics figures (<https://www.bls.gov/oes/current/oes211021.htm>) and to the inclusion of fringe benefits and overhead. To account for fringe benefits and overhead, OCSE multiplied the hourly rate by two, or \$44.48.

The estimated annualized cost to respondents for hour burden is \$44.48 times 626.40 or

\$27,862.

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

There are no other costs to the respondents.

14. Annualized Cost to the Federal Government

The total annualized cost to the federal government for the IRG is \$272,000. This includes federal salaries and benefits of \$48,000 and contractor and hardware/software costs of \$224,000. The increased costs to the federal government since the previous approval are due to the inclusion of incremental operating costs and the estimates for federal salaries and benefits, which were not included in the previous submission.

15. Explanation for Program Changes or Adjustments

State agencies requested that OCSE create a new program category (Section O: Family Violence) and add six questions regarding family violence to the State Profile. These revisions are pertinent to efficient intergovernmental child support processing and in helping to ensure the safety of children and families. While these revisions constitute a program change, they do not impact the burden hour because the average amount of time it takes to answer any of the questions in the State Profile remains the same and we anticipate respondents will continue to complete the same number of questions, on average, per response. State respondents are not required to answer the new six questions, but if a respondent does choose to respond to any of them, they will typically do so only one time. Occasionally, a respondent may amend their initial answers.

Tribal agencies requested that OCSE remove the current program categories (Sections A-L: General/Tribe-At-A-Glance, UIFSA, Reciprocity, Age of Majority, Statute of Limitations, Support Detail, Income Withholding, Paternity, Order Establishment, Support Enforcement, Modification and Review/Adjust, and Lump Sum Payments) of the Tribal Profile, which contained 140 questions, and replace them with new program categories (Sections A-D: Tribal Sovereignty, General Program-At-A-Glance, Intergovernmental Process, and Program Details). The added sections contain 11 new questions regarding case processing. These revisions are pertinent to the efficient establishment of paternity and child support obligations. While these revisions constitute a program change, they do not impact the burden hour because the average amount of time it takes to answer any of the questions in the Tribal Profile remains the same and we anticipate respondents will continue to complete the same number of questions, on average, per response. Tribal respondents are not required to answer the new six questions, but if a respondent does choose to respond to any of them, they will typically do so only one time. Occasionally, a respondent may amend their initial answers.

16. Plans for Tabulation and Publication and Project Time Schedule

There are no plans for tabulation and publication.

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable.