

#	Date Submitted	Submitted By	Form or Instructions	Comment	Category	Response
1	12/24/19	DC	Both	Section VI. • Direct employers to forward the IWO notice to their payroll processing company or payroll officer.	Section VI	Disagree. Minimal changes should occur to avoid costs to states of changing the form and only one commenter suggested this change.
2	12/24/19	DC	Both	Section VII • Section completed by employer that provides termination status for employee should include Name/Signature line for person completing the form and contact phone number	Section VII	Disagree. Minimal changes should occur to avoid costs to states of changing the form and only one commenter suggested this change.
3	01/06/20	GA Courts	Form	Entire document: For each text field in the document, please allow data entry for the full length of the field. In Georgia, one way we assist self-represented litigants with completing the IWO form, is to add 'helpful hints' in the text fields. For example, in 'Section IV, Amounts to Withhold,' we enter in the pay schedule text fields the numbers associated with the pay schedule, i.e., 52 for weekly, 26 for bi-weekly, 24 for semi-monthly, and 12 for monthly. Unfortunately, we find that many people who inquire with us do not understand the difference in 'bi-weekly and semi-monthly,' so inserting numbers serves well as a helpful hint for the public. Other text fields require the entry of 'words' to explain what is to be entered in the field and having the full length of the text field open and available for us to insert instructions would be very helpful. If there are questions on this item, please call 404-463-6383 or email elaine.johnson@georgiacourts.gov	Entire Document Field Length on PDF Version	Agree with providing a pdf version for the OCSE web site to allow typing in full length of lines. See comments 5 & 7 Disagree with suggestion to further define bi-weekly and semi-monthly. Section IV, Amounts on the IWO form has language explaining what they mean.

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4	01/06/20	GA Courts	Form	<p>Page 1, Section II Employer and Case Information</p> <p>In the box, I recommend using the Paragraph feature in Word to allow the addition of a little more space between the top of the box and the text. If necessary, slightly reduce the amount of space at the bottom of the box, again using the Paragraph feature in Word. This revision will allow more space between where one will enter the "Employer/Income Withholder's Name" and the "Employee/Obligor's Name" in the top section of this box.</p>	Section II, Formatting	Agree with formatting to allow more space for Employer/Income Withholder's Name, and Employee/Obligor's Name.
5	01/06/20	GA Courts	Form	<p>Page1, Section III - Order Information, and Section IV – Amounts to Withhold, and Page 2, Section V – Remittance Information (including the 'Remit Payment to' box)</p> <p>For all these sections, please extend each text field to utilize all space available on each line. (I am an old school proponent of utilizing all space available on each line of a form, especially if it allows more text space for the entry of information.) For example, in Section V, the last line of the first paragraph does not extend as far as the end of the available space on that line. Increasing text field lengths in the entire paragraph will extend field sizes and make it easier for the public to hand write entries, if they chose not to type information.</p>	Section III, Formatting	Agree with providing a pdf version for the OCSE web site to allow typing in full length of lines. See comments 3 & 7
6	01/06/20	GA Courts	Form	<p>Page 2, Section V</p> <p>Add a hard return following the sentence after the last text box on the page (this is the sentence where if the box is checked the employer will provide a copy of the IWO form to the employee/obligor.) This change will separate the information and instruction making it easier for the employer to see the check box and any check mark in the box.</p>	Section V, Formatting	Agree with adding blank space before the checkbox to separate the information.

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7	01/06/20	GA Courts	Form	Page 3, Section VI Please leave all text fields available for data entry for the entire and full length of each line under each topic: 'Liability,' 'Anti-discrimination,' and Supplemental Information.'	Section VI, Formatting	Agree with providing a pdf version for the OCSE web site to allow typing in full length of lines. See comments 3 & 5
8	01/06/20	GA Courts	Form	Page 4, Section VII In the 'Contact Information' section, add a family/domestic violence warning message. Suggested message: If you are the victim of Family or Domestic Violence in this case, rather than including your direct contact information, enter contact information for someone else who will communicate on your behalf.	Section VII, Form Addition	Agree to add to IWO Instructions, Section VIII, Contact Information. Since the IWO form is directed to employers and is usually filled out by child support agencies and courts/attorneys, pro se use of the form is not needed extensively in most states. New language: If the sender is a victim of Family or Domestic Violence, rather than including direct contact information, enter contact information for someone else who will communicate for you.
9	01/09/20	OCSE	Form	The Portal help desk still receives inquiries from employers requesting assistance with registration so they can make child support payments through the Portal. In many cases, the help desk staff explain that they can't make payments through the Portal and they will accept that. Other times, the staff will need to walk through the IWO document sentence by sentence to get to the part where the employer thinks payments through the Portal are possible. The following section from the form is usually what's cited: "Employers/income withholders may use OCSE's Child Support Portal (https://ocsp.acf.hhs.gov/csp/) to provide information about employees who are eligible to receive a lump sum payment, have terminated employment, and to provide contacts, addresses, and other information about their company." Is it possible to add a sentence like "Child support payments may not be made through the Child Support Portal" to this paragraph. I know it sounds like overkill, but employers are not reading the instructions very carefully.	Section VI, Form Addition	Agree to add language in Section VI Additional Information, Payments and Lump Sum Payments New language: Child support payments may not be made through the federal Office of Child Support Enforcement (OCSE) Child Support Portal.

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10	01/23/20	VA	Form and Instructions	The Division supports the proposed changes.		Thank you for this comment.
11	02/06/20	NY	Form	NYS OTDA recommends that consideration be given to the use of consistent formatting and language when referencing sections within the form. For example, on page 1, IV. Amounts to Withhold, the reference to Order Information is italicized and referenced by title only (i.e., neither "Section III" nor "section" is included as a pointer). On page 2, V. Remittance Information, a reference to the same section is bolded and italicized, with "section" included as a pointer. Page 2, V. Remittance Information, also includes a reference to the Supplemental Information section, which is neither bolded nor italicized but includes "section" as a pointer. Use of consistent formatting and language would facilitate the recognition of references to other information within the form. For visual ease, use of bold text is recommended.	Sections IV & V, Formatting	Agree with consistent formatting.
12	02/06/20	NY	Form	Section IV. Amount to Withhold, Lump Sum Payment The Lump Sum Payment instruction indicates that the employer/income withholder should not stop any existing IWO unless a "termination order" is received. For consistency with the "Termination of IWO" check box in Section I. Sender Information, NYS OTDA recommends the Lump Sum Payment instruction be revised to read as follows: "Do not stop any existing IWO unless you receive a Termination of IWO."	Section IV, Consistency	Disagree. States are not required to use the IWO to terminate withholdings. If the IWO form uses exactly the same terminology (i.e., Termination of IWO), it might imply that the employer must receive an IWO form to terminate the withholding.
13	02/06/20	NY	Form	The proposed information collection lists an expiration date of August 31, 2020 (08/31/2020). NYS OTDA notes that pursuant to the associated Federal Register notice, a three-year extension of the IWO is being requested. To that end, NYS OTDA suggests that an expiration date of August 31, 2023 (08/31/2023) be listed on page 1 of the form.	Expiration Date	Agree. The new expiration date will be entered on page one of the revised IWO form.

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14	02/06/20	NY	Form	<p>Section V. Remittance Information, Arrears Greater than 12 Weeks</p> <p>The third paragraph of Section V. Remittance Information concludes with the following instruction: "If the Order Information section does not indicate that the arrears are greater than 12 weeks, then the employer should calculate the CCPA limit using the lower percentage." However, the third sentence in the first paragraph of this section includes a data field for the specific percentage of disposable income to be withheld for all orders when the full amount of support cannot be withheld for any or all orders for the given employer/obligor. Pursuant to Action Transmittal AT-17-09, the IWO sender must enter a specific withholding percentage, up to the Consumer Credit Protection Act (CCPA) limits, in this data field. Therefore, NYS OTDA recommends the deletion of the noted instruction from the third paragraph of Section V. Remittance Information.</p>	Section V, Contradiction, CCPA	<p>Disagree. This language was added in the 2014 revisions to the IWO form (Additional Information section) because employers received many IWOs in which the arrears greater than 12 weeks was not checked, but the CCPA percentage in Section V showed an extra 5% indicating that arrears were greater than 12 weeks. The language was moved to the current location, but is not new to the form.</p> <p>Since the instruction is directed to employers and assists them in implementing the IWO if the Arrears greater than 12 week checkbox and the percentage in Section V do not synchronize, we will retain the language. See comments 53, 77, 81, 89, 93</p>
15	02/06/20	NY	Form	<p>Section V. Remittance Information, Remit Payments Box</p> <p>NYS OTDA recommends the information about how to remit payments be prominently displayed on the IWO and therefore suggest the text within the Remit Payments box be centered, rather than left justified, for emphasis and noticeability.</p>	Section V, Formatting	<p>Disagree. Centering the text in the textbox would differ from all the other text and would not improve readability. Only 1 commenter suggested this change.</p>
16	02/06/20	NY	Form	<p>Section V. Remittance Information, Remit Payments Box</p> <p>In conjunction with NYS OTDA's Comment 15, NYS OTDA recommends the inclusion of additional text within the Remit Payments box to indicate that the Remittance ID must be included with the payment. For example, the following language could be added after the address information: "Include the Remittance ID with the payment."</p>	Section V, Remittance ID	<p>Agree with retention of Remittance ID. See comments 61 & 90</p>

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17	02/06/20	NY	Form	Section V. Remittance Information, Return to Sender Check Box In conjunction with NYS OTDA's Comment 11, NYS OTDA recommends, at a minimum, the following technical correction be made to the first sentence of text following the Return to Sender check box. The parenthetical "see Payments to SDU below" should be replaced with "see Payments below" to reflect the correct title of the referenced section, which is on page 3 of the form.	Section V, Correction	Agree with this change to synchronize the reference to the Payments section. See comment 68
18	02/06/20	NY	Instructions	With reference to NYS OTDA's Comment 1, NYS OTDA recommends that consideration be given to the use of consistent formatting and language when referencing sections within the instructions. In the ! instruction for field 1c., for example, Section IV. Amounts to Withhold is italicized. In the instruction for field 1h, however, the reference to the Remittance Information section is not italicized. To facilitate the recognition of references to other information within the instructions, use of bold text is recommended.	Section IV, Formatting	Agree to remove italics. Disagree to bolding. Bolding additional text will decrease significance of the headings.
19	02/06/20	NY	Instructions	NYS OTDA recommends that the instructions be reformatted to ensure that information which is to be included within a text box appears within the box on the same page. For example, on page 1, the NOTE TO EMPLOYER/INCOME WITHHOLDER continues onto the next page, where the information is not contained within the text box. On page 4, the NOTE TO EMPLOYER/INCOME WITHHOLDER continues onto the next page, splitting the text box.	Section I, Formatting	Agree with formatting change. See comments 21, 34, 69, 84
20	02/06/20	NY	Instructions	Sender Information The instructions have been organized by section, and all the other sections have been numbered. For purposes of consistency, NYS OTDA recommends that "Sender Information" be replaced with "I. Sender Information."	Section VIII, Consistency	Agree with adding Roman numeral before Sender Information.

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21	02/06/20	NY	Intructions	Note to Employer/Income Withholder The NOTE TO EMPLOYER/INCOME WITHHOLDER identifies circumstances where the IWO must be rejected and returned to the sender. All but one of these circumstances is displayed in a bulleted list. NYS OTDA recommends that all circumstances be displayed in the bulleted list. That is, an additional bullet would replace the last two (2) sentences of the note. The added bullet would read as follows: "A , copy of the underlying order is required and not included. (A copy of the underlying support order containing a provision authorizing income withholding must be attached if you receive this document from an attorney or a private individual/entity.)"	Section I, Formatting	Agree with formatting change. See comments 19, 34, 69, 84
22	02/06/20	NY	Instructions	Note to Sender The NOTE TO SENDER includes a reference to "OCSE's AT-17-07: Interstate Child Support Payment Processing." NYS OTDA recommends inclusion of a hyperlink to this Action Transmittal and its uniform resource locator (URL). The presentation would then be consistent with that found on page 3 of the instructions, where Action Transmittal 16-04 was referenced in the NOTE TO EMPLOYER/INCOME WITHHOLDER.	Section V, URL	Agree with adding the URL in Section V. New language: The Sender must designate the correct SDU. In certain cases, the Sender may be required to designate an SDU (field 22), corresponding SDU Address (field 23), and if required Locator Code (field 24) that is different than the Sender's SDU (see OCSE's AT-17-07: Interstate Child Support Payment Processing, https://www.acf.hhs.gov/css/resource/interstate-child-support-payment-processing).
23	02/06/20	NY	Instructions	Instruction for Field 40 The instruction for field 40 is titled "New Employer's Name." The name of the corresponding field on the IWO form, however, is "New employer's or income withholder's name." NYS OTDA recommends use of the form's actual field name in the instruction for this field.	Section VII, Consistency	Agree with adding Income Withholder to this heading. New language: 40. New Employer's or Income Withholder's Name. Name of employee's/obligor's new employer or income withholder (if known).

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24	02/06/20	NY	Instructions	Instruction for Field 41 The instruction for field 41 is titled "New Employer's Address." The name of the corresponding field on the IWO form, however, is "New employer's or income withholder's address." NYS OTDA recommends use of the form's actual field name in the instruction for this field.	Section VII, Consistency	Agree with adding Income Withholder to this heading. New language: 41. New Employer's or Income Withholder's Address. Address of employee's/obligor's new employer or income withholder (if known).
25	02/10/20	KY	Form	Page two - an extra line beyond state/tribe in the remittance information in section V.	Section V, Formatting	Agree with formatting change. See comments 41 and 63
26	02/10/20	KY	Form	Page three – an extra space before Lump Sum Payments.	Section VI, Formatting	Agree with formatting change.
27	02/10/20	KY	Form	Page four – the link in the text box – appears that the highlight signifying a link extends beyond the actual URL.	Section VII, Formatting	Agree with formatting change.
28	02/10/20	KY	Instructions	Procedural Instructions – Sender Information is missing a section number.	Section I, Formatting	Agree with formatting change.
29	02/10/20	TX	Both	The proposed revisions to the IWO form and its instructions include an employer instruction that may cause confusion with state law remittance requirements. This instruction is found in the "Payments" subsection of Section VI, "Additional Information for Employers/Income Withholders." Rather than referring the employer to state law for remittance requirements, the "Payments:" subsection tells employers that payments must be sent to the appropriate SDU or tribal CSE agency "within 7 business days after the date the income would have been paid to the employee/obligor[.]" This proposed instruction is inconsistent with Texas law that requires payment remittance consistent with the obligor's pay date (not "within 7 business days" after that pay date). See Tex. Fam. Code § 158.203. Alternatively, the proposed instruction could instruct employers to "remit payment as required by applicable state law, but no later than the seventh business day after the date the income would have been paid to the employee/obligor"	Section VI, Payments	Agree with adding language to clarify that states may require payments be remitted in less than seven days. New language: You must send child support payments payable by income withholding to the appropriate State Disbursement Unit or to a tribal CSE agency within 7 business days, or fewer if required by state law, after the date the income would have been paid to the employee/obligor and include the date you withheld the support from his or her income.

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30	01/15/20	AL	Form	Page 2, Section V---The colon after "Remittance Information" should be bolded and the italics font removed.	Section V, Formatting	Agree with formatting change.
31	01/15/20	AL	Form	Page 3, Section VI—There appears to be an extra space before "Lump Sum Payments:".	Section VI, Formatting	Agree with formatting change.
32	01/15/20	AL	Form	Page 3, Section VI—The last two lines under "Anti-discrimination:" are showing in red colored font.	Section VI, Formatting	Agree with formatting change.
33	01/15/20	AL	Form	Page 4, Section VII—The underline needs to be deleted and the blue text color needs to be changed to black for the sentence "If the employee/obligor is receiving workers' compensation, you may report the new income withholder, if known."	Section VII, Formatting	Agree with formatting change.
34	01/15/20	AL	Instructions	Page 2, line 1—"withholding must be attached." is printing on page 2 instead of in the "NOTE TO EMPLOYER/INCOME WITHHOLDER" box on page 1.	Section I, Formatting	Agree with formatting change. See comments 19, 21, 69, 84
35	01/15/20	AL	Instructions	Page 2, 1g uses the term "governmental entity" and 1i uses "government entity"---should one be changed for consistency?	Section I, Consistency	Agree with change to government for consistency
36	01/15/20	AL	Instructions	Page 4, Section V.—There appears to be an extra space before the sentence that begins with "Payments are forwarded...".	Section V, Formatting	Agree with formatting change.
37	01/15/20	AL	Instructions	Page 5, #21—There are extra spaces between the number 21 and "State/Tribe".	Section V, Formatting	Agree with formatting change.
38	01/15/20	AL	Instructions	Page 5, Section VI—Do the terms "Priority", "Payments", and "Lump Sum Payments" need to be added to this section? See Section VI of the Income Withholding for Support document where the terms are used.	Section VI, Terminology	Disagree. The IWO Instructions give comments only on the items with blank field lines requiring entries by the sender.
39	01/15/20	AL	Instructions	Page 5, Section VII, #38---The word "Fnal" should be "Final".	Section VII, Spelling	Agree with fixing misspelling
40	02/12/20	CO	Both	We appreciate that OCSE is simplifying the forms for employers as it relates to Income Withholding Orders. The only comment we have is to spell out acronyms before they are used and/or to consider creating a small acronym key for reference.	Acronyms	Disagree. The acronyms on the IWO form and Instructions are commonly used and well-understood. See comment 63

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41	02/12/20	IA	Form	<p>Page 2, Section V - Remittance Information: In the first sentence there is a blank space after (State/Tribe). We are unsure what to include in this blank space. We request clarification of what should be included in the blank space or suggest removing the blank space so the sentence reads:</p> <p>If the employee/obligor's principal place of employment is _____ (State/Tribe), you must begin withholding no later than the first pay period that occurs _____ days after the date of _____ of the order/notice. OR If the employee/obligor's principal place of employment is _____ (State/Tribe), you must begin withholding no later than the first pay period that occurs _____ days after the date of _____ of the order/notice.</p>	Section V, Wording	<p>Agree with this comment to remove the blank space. See comments 25 and 51 New language: If the employee/obligor's principal place of employment is _____ (State/Tribe), you must begin withholding no later than the first pay period that occurs _____ days after the date of _____ of the order/notice.</p>
42	02/12/20	IA	Form	<p>Page 3, Section VI - Additional Information for Employers/Income Withholders: (Completed by the Sender) under Lump Sum Payments In the last sentence, we believe there is an error. We suggest correcting the sentence to read:</p> <p>Employers/income withholding may use OCSE's Child Support Portal (https://ocsp.acf.hhs.gov/csp/) to provide information about employees who are eligible to receive a lump sum payment and to provide contacts, addresses, and other information about their company. OR Employers/income withholding may use OCSE's Child Support Portal (https://ocsp.acf.hhs.gov/csp/) to provide information about employees who are eligible to receive lump sum payments and to provide contacts, addresses, and other information about their company.</p>	Section VI, Consistency	<p>Agree with editing for consistency New language: Employers/income withholders may use OCSE's Child Support Portal (https://ocsp.acf.hhs.gov/csp/) to provide information about employees who are eligible to receive lump sum payments and to provide contacts, addresses, and other information about their companies.</p>
43	02/12/20	IA	Both	Agree with all the proposed changes.	Agreement	Thank you for this comment.

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44	02/12/20	MN	Both	Part VII. Notification of Employment Termination or Income Status, can you add Unemployment as an option for new payment sources? That would give us a flag to watch for that.	Section VII, New Payment Source	Disagree. An employer does not know this information in a timely fashion.
45	02/12/20	MN	Both	Could there be an IWO check-box to indicate multiple or a series lump sum payments, instead of only one at a time?	Section I, Multiple Lump Sum	Disagree. It is not practical for an employer to retain a lump sum IWO for possible lump sum payouts at unknown dates.
46	02/12/20	MN	Form	The 'blank box' on p1 of the form should be labeled to describe its intended use.	Section II, Label	Disagree. The instruction for the use of this box are contained in the IWO Instructions, field 3g.
47	02/12/20	MN	Form	Section III line 11a-c, "other" support to withhold, one line may not be sufficient. Can multiple lines be provided, or a check-box or other way to reference text information to be provided elsewhere in the document? (Such as in the 'Supplemental Information' field.)	Section III, Space	Disagree. This line is not used frequently and there is only one comment on this topic.
48	02/12/20	MN	Form	It might be better to have the Remittance ID with Section V where all the other remittance information is.	Section I, Relocate	Disagree. Employers find it most easily on page one.
49	02/12/20	MN	Both	Section V it states "you must begin withholding no later than the first pay period that occurs _____ days after the date of _____ of the order/notice. Will the effective date of the order be pulled in here? The problems we have experienced in the past is when there is a future effective date for COLA or a modification, and the IW prints a couple weeks prior to the effective date of when withholding is to actually begin, it is not clear to the employer they are to hold off withholding until after the effective date. We want the withholding to go out ahead of time so they are aware of the change but don't want the employer to start withholding too quickly.	Section V, Effective Date	Disagree. Future-dated IWOs are problematic for employers as they normally implement IWOs quickly. Also, e-IWO does not accommodate future-dated IWOs. Senders should send IWOs to employers only when they should be implemented. Only one commenter indicated that they objected to this change because they wished to send future-dated IWOs. See comments 59, 85, 96
50	02/12/20	CA	Form	Section II. We recommend increasing spacing for readability and making the box for bar codes and court stamps larger. Most court stamps won't fit and if a bar code is too small some optical readers will not be able to be used to process this form.	Section II, Space	Disagree. Adding space to the Section II blank box is not needed in most states. See comment 78

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51	02/12/20	CA	Form	Section V. There appears to be an extra blank space in the first sentence after "(State/Tribe)", and we are unsure of its purpose. In the signature box labeled "If Required by State or Tribal Law:", we recommend increasing the spacing between each line for readability.	Section V, Space	Agree with removing the blank space. See comments 25 and 41 New language: If the employee/obligor's principal place of employment is _____ (State/Tribe), you must begin withholding no later than the first pay period that occurs ___ days after the date of _____ of the order/notice.
52	02/12/20	CA	Form	Section V. Regarding the employer's requirement to provide a copy of the IWO, we recommend adding a sentence that reads: "A copy must also be provided to the employee when otherwise required by law."	Section V, Copy of IWO	Disagree. 45 CFR 303.100 (d) requires the state to send a notice to the noncustodial parent regarding the initiated withholding. It must inform the noncustodial parent that the withholding has commenced; the amount of overdue support, if any; the amount of wages to be withheld; that the provisions apply to any current or subsequent employer; of procedures for contesting the withholding, of information provided to the employer pursuant to paragraph (e).

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53	02/21/20	CA	Form	<p>Section VI. We are concerned with the removal of information under "Reporting the Pay Date", as the collection of pay date information from the employer at the time of remittance is still required. For states that have established the date of withholding as the legal date of collection un 42 USC §654(c)(1), this information must be captured. It may also be helpful to have in other states that have not made such an election. It can be used to associate amounts withheld from a paycheck stub to those amounts received by the SDU from the employer. We recommend including this information on the form.</p> <p>We are concerned that the paragraph titled "Withholding Limits" was stricken from this draft. This could potentially impact compliance with 45 CFR §303.100(e) (i) which required that the withholding is limited by 303(b) of the Consumer Credit Protection Act (15 USC 1673(b)). We understand some of the language was moved to "Section V. Remittance Information"; however, the definition of "disposable income" and the brief explanation of 15 USC 1673(b) (CCPA), which indicates the allowable maximum withholdings, is missing. This could be a customer service issue. We recommend including this information on the form.</p>	Section VI, Additional Information Removed, CCPA	<p>Disagree. Condensed language including reporting the pay date is contained in Section VI, Payments, first sentence which states "...and include the date you withheld the support from his or her income."</p> <p>Agree with adding a link in Section V to the CCPA which contains the definition of disposable income. See comments 14, 77, 81, 89, 93</p> <p>New language: The CCPA is available at https://www.dol.gov/sites/dolgov/files/WHD/legacy/files/garn01.pdf.</p>
54	02/21/20	CA	Form	Section VII. After "Contact Information:", we recommend including "(Completed by the Sender)" for clarification.	Section VII, Consistency	Agree with adding for consistency

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55	02/12/20	CA	Instructions	#30: "Copy of IWO checkbox" instructions should be modified to indicate that the box should also be checked where the employer is required to provide a copy to the employee under state or tribal law. Such a change would allow senders to make more effective use of the form by freeing up space in the "Supplemental Information" section.	Section V, Copy of IWO	Disagree. 45 CFR 303.100 (d) requires the state to send a notice to the noncustodial parent regarding the initiated withholding. It must inform the noncustodial parent that the withholding has commenced; the amount of overdue support, if any; the amount of wages to be withheld; that the provisions apply to any current or subsequent employer; of procedures for contesting the withholding, of information provided to the employer pursuant to paragraph (e).
56	02/12/20	CA	Instructions	#38 "Fnal" should read "Final" (Typo)	Section VII, Typo	Agree with editing misspelling
57	02/13/20	MO	Form	<p>We agree with the addition of section headers and descriptions regarding who completed each section. Overall, we agree that the rearrangement of text within the form was appropriate, e.g., all of the withholding limitation information is now in the same area on page 2. However, since the overall form length was not decreased and still remains at four pages, we question whether some text that was removed from the form as it was deemed unnecessary or is now only found in the instructions could be returned to the form as extra space now exists on both pages two and three. It is important to keep as much relevant information on the IWO as possible for the convenience of the employer.</p> <p>We suggest returning the multiple IWO paragraph and the reporting the pay date paragraph on page 3 of the current IWO form to this version. The pay date information would fit well within or in the vicinity of the Remittance Information section.</p>	Section VI, Additional Information Removed	<p>Disagree. Condensed language including reporting the pay date is contained in Section VI, Payments, first sentence which states "...and include the date you withheld the support from his or her income."</p> <p>Agree with adding multiple IWO information in Section V. See comment 53</p> <p>New language: If there is more than one IWO against this employee/obligor and you are unable to fully honor all IWOs due to federal, state, or tribal withholding limits, you must honor all IWOs to the greatest extent possible, giving priority to current support before payment of any past-due support.</p>

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58	02/13/20	MO	Form	On page 1, the spacing in the first sentence under III. Order is slightly indented and needs to be moved to the left. In Section IV., the (Completed by the Sender) needs to be bolded for consistency with the rest of the section headers. The same applies for the Section V. header on page 2 as the (Completed by the Sender, except for the "Return to Sender" check box.) should be bolded.	Sections III, IV & V, Formatting	Agree with consistent formatting.
59	02/13/20	MO	Form	Regarding the new text field on page 2 in the Remittance Information section requiring the effective date to now be expressed as "service", "receipt" or "mailing" of the order/notice, as IWOs are issued both electronically (eIWO) or sent by mail, this may pose a programming concern. Missouri anticipates additional programming would be necessary within our case management system to populate this field differently based on whether the IWO is mailed (populate as "mailing") or sent electronically via eIWO ("receipt").	Section V, Effective Date	Disagree. The field should reflect state law regarding the effective date of an IWO sent to an employer. Since all IWOs issued by one state would be governed by that state's law, all would have the same language. OCSE will clarify in the e-IWO record layout that date of mailing and date of receipt are the date of transmission to the employer. See comments 49, 85, 96
60	02/13/20	MO	Form	We agree with moving the CCPA withholding limits to the Remittance Information section. We additionally suggest moving paragraph four regarding nonemployee withholding limits up on the form and adding it to the end of paragraph two about state-withholding limits as it seems to be a better fit there. The statement that the employer may need to consider amounts paid for health care premiums in determining disposable income and withholding limits has been removed from this proposed IWO. We encourage returning this health care premium reference to the IWO form and suggest an appropriate placement would be within the rest of the withholding limit information on page 2.	Section V, Withholding Limits and CCPA	Thank you for the comment agreeing with moving the CCPA limits. Disagree with moving nonemployee withholding limits. Only one state has suggested moving this item. Agree with adding the health care premium reference to the IWO instructions in Section V, Notes to Employer/Income Withholder text box. New Language: Depending upon applicable state or tribal law, you may need to consider amounts paid for health care premiums in determining disposable income and applying appropriate withholding limits.

#	Date Submitted	Submitted By	Form or Instructions	Comment	Category	Response
61	02/13/20	MO	Form	FSD strongly supports returning a statement instructing employers to include the remittance ID with the payment to page 2 and suggest placing it within the Remit Payment To textbox as it is an important instruction for the employer. Even though it is included on page 1 in the Remittance ID field and in the form instructions, it should also be included with the SDU address as that is the easily identifiable area the employer will be referring to regarding sending payments. FSD approves of the link added for SDU contacts within this text box; however, we suggest changing the wording from "contact the State Disbursement Unit" to «contact the State Disbursement Unit listed above".	Section V, Remittance ID	<p>Agree with retaining the Remittance ID on the IWO form. See comments 16 and 90</p> <p>New language: Include the Remittance ID with the payment and if necessary this locator code of the SDU/Tribal order payee _____ on the payment.</p> <p>Disagree with adding "SDU listed above". The matrix is a general resource, and employers may need to set up electronic payments in multiple states.</p>
62	02/13/20	MO	Form	The Return to Sender checkbox paragraph on page 2 contains a reference to (See Payments to SDU below). The "Payments to SDU" paragraph no longer exists on this version of the form. This version of the form references "Payments Section" and is located on page 3 rather than "below" on page 2.	Section V, Consistency	Agree with this change to synchronize the reference to the Payments section. See comment 17
63	02/13/20	MO	Form	Beginning on page 2, State Disbursement Unit (SDU) should be spelled out in the first reference on the form and then abbreviated on the rest of the form. The IWO lacks consistency in this aspect.	Section VI, Consistency	Disagree. Acronyms on the IWO form and Instructions are commonly used and well-understood. See comment 40
64	02/13/20	MO	Form	On page 3, we suggest a wording change to the last sentence of the Payments paragraph to "You may combine withheld payments from more than one employee/obligor's income in a single payment; however, you must separately identify each employee/obligor's portion of the payment".	Section VI, Payments	Disagree. The suggested wording is not a substantive change.
65	02/13/20	MO	Form	We suggest expanding the eiWO character length for the Liability, Anti-discrimination and Supplemental Information fields. Our state has difficulty fitting the desired state-specific information within the 160-character length limit for these fields.	Section VI, e-IWO	Disagree. Adding to the character length of e-IWO fields affects all states and employers using e-IWO and minimal changes should occur to avoid costs to both states and employers.

#	Date Submitted	Submitted By	Form or Instructions	Comment	Category	Response
66	02/13/20	MO	Form	It is unknown whether Missouri employers will have an issue with providing information regarding workers' compensation in Section VII. on page 4; however, it is optional for employers to do so. During the IWO workgroup call with the employer group, employers expressed concern that payroll would not have this information or if the information is known, may just be limited to being able to say an employee is leave without pay. We suggest rephrasing the last sentence to clearly direct where the reporting of the workers' compensation should be included, possibly "If the employee/obligor is receiving workers' compensation, you may report this as the new income withholder below, if known."	Section VII, Notice of Employment Termination	Agree with changing to the wording suggested in Comment 91. New language: "Please report the new employer or income withholder, if known."
67	02/13/20	MO	Form	The VIII. Section identifier was omitted and needs to be added to the Contact Information section header on the IWO form. It is identified as Section VIII., in the accompanying instructions. In the "To Employer/Income Withholder" section under Contact Information, we would prefer the "Send termination/income status notice and other correspondence to" be listed before "If you have questions, contact". Our state has different fax numbers for questions versus terminations/correspondence and some employers are using the first fax number to report terminations.	Section VIII, Consistency	Agree with adding section identifier and will add Income Withholder in field label. Disagree with changing the order of the text. Only one commenter suggested this.
68	02/13/20	MO	Instructions	On page 1 of the instructions, there should be an "I." before the Sender Information denoting the section header. This section instructs to "check only one box" but the check box directive only applies to la. through ld. It does not apply to le. and lf. includes its own check box instructions. We suggest that check only one box be moved to a separate line with instructions to check only one box in la. through ld.	Section I, Formatting	Agree with adding the section number and will clarify directions about the check boxes. New language: I. Sender Information: (Completed by the Sender) Check one box for fields 1a – 1d. 1f. Child Support Enforcement (CSE) Agency, Court, Attorney, Private Individual/Entity (Check one box).

#	Date Submitted	Submitted By	Form or Instructions	Comment	Category	Response
69	02/13/20	MO	Instructions	The bulleting in the NOTE TO EMPLOYER/INCOME WITHHOLDER text box is off. The statement "A copy of the underlying order is required and not included" should also be a bulleted item. Additionally, the first line of text on page 2 of the instructions is actually the end of the last sentence in the text box and needs to be moved.	Section I, Formatting	Agree with consistent formatting. See comments 19, 21, 34, 84
70	02/13/20	MO	Instructions	Regarding Instruction 3e. on page 3, we question whether it should be Child(ren) of multiple custodial parties/obligees are not to be entered on an IWO, not "is". It does not flow well as currently stated.	Section I, Grammar	Disagree. Changing the existing wording would require more space on the form and only one commenter made this suggestion.
71	02/13/20	MO	Instructions	We express concern with the NOTE TO SENDER textbox after Instruction 21 on page 5 regarding the SDU address and Remittance ID instruction from both the standpoint as an issuing jurisdiction and as the state receiving payments based on the Remittance ID from other states. Missouri's child support system does not currently have the capability to identify or store another state's Remittance ID. Payments are currently sent to other states with Name, SSN and Case ID information. Significant programming would be required to capture and include Remittance ID information to process payments. In addition, as we have expressed previously, IWO generation is an automated process in our state. Obtaining the Remittance ID from another state to include on an IWO is cumbersome and would likely delay the issuance of the IWO within two business days as federally required.	Section V, Payments to Other States	Disagree. If a state determines the best case processing decision is direct income withholding in a case, the state must be able to issue a direct income withholding order based on other states' child support order and include the appropriate remittance information. Also, if a state receives payments from an employer based on information (including remittance ID) from a direct income withholding order issued by another state, the state must be able to receive those payments and forward them by request to the appropriate state. Interstate payment processing requirements are described in AT-17-07. Regarding the 2-day timeframe for issuing an IWO, page 8 on AT-17-07 describes the additional time allowed to receive necessary information from another state on the IWO.

#	Date Submitted	Submitted By	Form or Instructions	Comment	Category	Response
72	02/13/20	MO	Instructions	<p>On page 6 in the VII. header, the (Completed by the Employer/Income Withholder) the font size appears to be larger than in all other sections. The font should be reduced in size for consistency in all Instruction section headers.</p> <p>In addition, Instructions 40 and 41 should state New Employer/Income Withholder's Name and New Employer/Income Withholder's Address, not just Employer.</p> <p>The statement "The employer/income withholder may report new payment sources such as workers' compensation, if known." could be misleading to employers. Workers' compensation reporting is optional but under 45 CFR 303.100 (e)(l)(x), employers are required to provide the name and address of the noncustodial parent's new employer, if known.</p>	Section VII,	<p>Agree with consistent formatting.</p> <p>Agree with adding Income Withholder in these Instructions. See comments 23 & 24. New language contained at Comments 23 and 24</p> <p>Agree with changing this to the wording suggested by ND in Comment 91. New language: Please report the new employer or income withholder, if known.</p>
73	02/13/20	MO	Instructions	In the Instructions header for VIII, the "r" in the Completed by Sender needs bolded.	Section VIII, Formatting	Agree with consistent formatting.
74	02/13/20	MO	Instructions	As a general overall comment, we continue to prefer that the federal Office of Child Support Enforcement release the form and instruction changes and the change to the eiWO Detail Record layout at the same time. This will allow us to program for the paper process and electronic process at the same time.	e-IWO	Agree with publishing the IWO form, Instructions, and e-IWO Record Layout at the same time.

#	Date Submitted	Submitted By	Form or Instructions	Comment	Category	Response
75	02/14/20	Domestic Relations Association of PA (DRAP)	Form	(a) whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility (1) The larger print is helpful making the proposed format user friendly. (2) We are concerned with the deletion of the addendum which exists in the current form as it is helpful in where the Obligor has multiple cases. In cases where multiple obligations exist, the current addendum is useful in account for all obligations which may result in less confusion to employers and less priting of additional attachments.	Formatting, Multiple Cases on One IWO	Agree with consistent formatting. In the 2017 IWO revisions, OCSE clarified that only one case should be entered on one IWO. Separate IWOs should be issued for each IV-D case. See comments 78, 79, 80, 92
76	02/14/20	Domestic Relations Association of PA (DRAP)	Form	(b) the accuracy of the agency's estimate of the burden of the proposed collection of information (1) We do not have sufficient information, and, as such we can neither affirm nor deny the annual burden estimates of 736,439 hours.	Burden Hours	Thank you for this comment.
77	02/14/20	Domestic Relations Association of PA (DRAP)	Form	(c) the quality, utility and clarity of the information to be collected; and (1) Part V Remittance: (a) The language relating to the withholding limits, in particular, the reference to the Consumer Credit Protection Act (CCPA) [legal cite], may cause confusion to employers. The CCPA paragraph could be moved up to immediately follow the first paragraph which states the amount to be withheld.	Section V, CCPA	Disagree. OCSE is adding a link to the CCPA to clarify Section V of the instructions. See comments 14, 53, 81, 89, 93
78	02/14/20	Domestic Relations Association of PA (DRAP)	Form	(c) the quality, utility and clarity of the information to be collected; and (2) Section II: (a) We suggest the text box should be larger to accommodate state/county information needs. (b) This section refers to one obligee. The proposed version couldn't be used for multiple cases in its current form.	Section II, Multiple Cases on One IWO	Disagree. Adding space to the Section II blank box is not needed in most states. See comment 50 In the 2017 IWO revisions, OCSE clarified that only one case should be entered on one IWO. Separate IWOs should be issued for each IV-D case.
79	02/14/20	Domestic Relations Association of PA (DRAP)	Form	(c) the quality, utility and clarity of the information to be collected; and (3) Quality of information collected could be problematic in that it cannot be determined how multiple cases of an obligor will be treated. It is unclear how an obligation of support for multiple families will be collected.	Multiple Cases on One IWO	Disagree. In the 2017 IWO revisions, OCSE clarified that only one case should be entered on one IWO. Separate IWOs should be issued for each IV-D case.

#	Date Submitted	Submitted By	Form or Instructions	Comment	Category	Response
80	02/14/20	Domestic Relations Association of PA (DRAP)	Form	(d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology. (1) We suggest the continued use of the addendum in the current form. (2) Administratively, it would be helpful if the forms contained an identifying number.	Multiple Cases on One IWO, Identifying Form Number	Disagree. In the 2017 IWO revisions, OCSE clarified that only one case should be entered on one IWO. Separate IWOs should be issued for each IV-D case. The IWO form is approved by the Office of Management and Budget (OMB) under OMB #0970-0154. OCSE does not include any other identifying number, but states may use the Document Tracking Identifier for their purposes.
81	02/14/20	MI	Form	We (Michigan's IV-D program office) would like to know the reason(s) for removing the sentence, "[t]he combined support amount and fee may not exceed the limit indicated in this section" from the Withholding Limits/Remittance Information section.	Section V, CCPA	Agree with adding this information to the IWO Instructions, Section V. See comments 14, 53, 77, 89, 93 New language: If permitted by the state or tribe, you may deduct a fee for administrative costs. The combined support amount and fee may not exceed the limit on the IWO.

#	Date Submitted	Submitted By	Form or Instructions	Comment	Category	Response
82	02/14/20	MI	Form	We suggest removing the entire first sentence which was added to the Payments paragraph under section VI. Additional Information for Employers/Income Withholders, "You must send child support payments payable by income withholding ..." This sentence is redundant with the second sentence in the V. Remittance Information section, "Send payment within business days of the pay date". 45 CFR 303.100(e) (1)(ii) and (ix) prescribe that the notice must direct the employer to send payment to the SDU within 7 days of the date the employee is paid. However, states may have a timeframe less than 7 days and indicate such in the second sentence of section V. Michigan law, MCL 552.609, requires employers to remit payment to the MiSDU within 3 days of the date of withholding and we populate the second sentence in section V. as 3 days. We feel that the new sentence added under section VI. contradicts the existing sentence in section V. Employers and other withholders would not be compliant with state law if they follow the instruction given in section VI and remit after the state-specific timeframe given in section V. An employer could easily argue that they are compliant by following the timeframe in section VI.	Sections V & VI. Contradiction	Agree with clarifying the first sentence in Section VI. New language: You must send child support payments payable by income withholding to the appropriate State Disbursement Unit or to a tribal CSE agency within 7 business days, or fewer if required by state law, after the date the income would have been paid to the employee/obligor and include the date you withheld the support from his or her income.
83	02/14/20	MI	Form	Formatting of the added section headings should be consistent. As drafted, all headings except section IV. and V. have the parenthetical "(Complete by Sender ...)" text in bold.	Sections V & VI, Formatting	Agree with consistent formatting.
84	02/14/20	MI	Instructions	In the instructions, under item 1f., for the NOTE TO EMPLOYER/INCOME WITHHOLDER, one line of text regarding a copy of the order is outside the newly added outline box. It also appears that this line should be part of the bulleted list.	Section I, Formatting	Agree with consistent formatting. See comments 19, 21, 34, 69

#	Date Submitted	Submitted By	Form or Instructions	Comment	Category	Response
85	02/14/20	MA	Form	<p>With one exception, DOR approves the proposed changes, as they make the IWO and instructions much easier to read and understand. DOR's sole objection is to the change in Section V relating to when income withholding must begin. The current version has a data field that requires a specific calendar date while the new form makes this a text field. This is the single data field change in the entire document and to require programming changes for one field is too burdensome. DOR welcomes all other changes. Breaking out the form into different sections and adding the party responsible for completing each section will be very helpful to those responsible for implementing the income withholding. Likewise, the use of simpler language makes the form much more accessible for everyone who has to deal with it.</p>	Section V, Effective Date	<p>Disagree. The IWO Workgroup consisting of state child support agencies and OCSE discussed and approved changing from a calendar date to a text entry using the wording of states' laws. This action was suggested by the Office of General Council. See comments 49, 59, 96</p>
86	02/14/20	WI	Form	<p>Under Section VII. Notification of Employment Termination or Income Status: We would request a box or line for termination reason be included on the form. If not feasible at least provide information as to a voluntary separation or quit on behalf of the employee. Then termination would indicate the employer choose to end the employment, as employers may be reluctant to provide a specific termination reason such as poor job performance, violation of company policy, etc. As there is currently no place for that information employers do not provide it. In some cases that information is important to a case and judicial officials will ask the child support agency to provide that information. In those cases, the child support agency must send another document to the employer to request that information, which the employer must respond to. Providing a space for that additional information on the IWO would save the additional steps of producing another document and the cost of mail and processing. This would save time and costs for both child support staff and employers.</p>	Section VII, Termination Reason	<p>Disagree. It is illegal for an employer to provide a reason for an employee's termination. See comment 94</p>

#	Date Submitted	Submitted By	Form or Instructions	Comment	Category	Response
87	02/14/20	WI	Form	As a general comment, we appreciate that the document kept to four pages. The volume of IWOs sent is large and any effort to limit the number of pages while still providing the necessary information is greatly appreciated.		Thank you for this comment.
88	02/14/20	ND	Form	We support the formatting changes to the IWO, particularly the addition of section headers . The formatting changes improve understanding of the form , as well as overall appearance.	Entire Form, Formatting	Thank you for this comment.
89	02/14/20	ND	Form	Likewise, we support efforts to simplify , consolidate , or re-locate language throughout the form , particularly the removal of details relating to income withholding limitations under the CCPA (which is not applicable for states like North Dakota whose withholding limitations don't mirror the CCPA) and the new placement of the "nonemployee" language . These changes improve the organization of the form and make it more customer-friendly for employers.	Section V, CCPA	Thank you for this comment supporting consolidation of CCPA information on the form. See comments 14, 53, 77, 81, 93
90	02/14/20	ND	Form	Thank you for retaining the remittance identifier field on the first page of the form . This data element is critical for us when processing income withholding collections . Because this data element is so important , we respectfully request that the reference on the second page be restored: "Include the remittance 10 and, if necessary , this locator code of the SDU/Tribal order payee	Section V, Remittance ID	Agree with retaining the Remittance ID on the IWO form. See comments 16 and 61
91	02/14/20	ND	Form	We have concerns about the new underscored sentence in the Notification of Employment Termination or Income Status section on the fourth page of the form . It is unclear why the workers' compensation situation is being singled out for mention and use of the word "may" implies that it doesn't really matter if the employer reports the new income w ithholder or not. We suggest using a simple declarative sentence instead: "Please report the new employer or income withholder , if known."	Section VII, Notification of Employment Termination	Agree with changing to the wording suggested. New language: "Please report the new employer or income withholder, if known."

#	Date Submitted	Submitted By	Form or Instructions	Comment	Category	Response
92	02/14/20	ERICSA	Form	The addendum was eliminated. We are very concerned that there is no provision for multiple cases I amounts to be withheld by an employer . It will be very confusing for an employer to receive multiple withholding orders for the same employee/obligor.	Multiple Cases on One IWO	In the 2017 IWO revisions, OCSE clarified that only one case should be entered on one IWO. Separate IWOs should be issued for each IV-D case. See comments 75, 78, 79, 80
93	02/14/20	ERICSA	Form	Section V. The first paragraph discusses what employers are to do if they cannot withhold the full amount of support . It is anticipated that the paragraph will be confusing to employers and result in either a delay or complete failure to withhold support. Further, the section should be restructured so that the third paragraph discussing the Consumer Credit Protection Act (CCPA) is moved to become the second paragraph. Again, it is anticipated that the current structure of the section will result in confusion for the employers and could result in their withholding too much support in violation of the CCPA.	Section V, CCPA	Disagree. Moving the order of the text was suggested by only one commenter. See comments 14, 53, 77, 81, 89
94	02/14/20	ERICSA	Form	Section VII. Two additional check boxes would be beneficial so that an employer could indicate whether the employee's/obligor's employment was terminated or if the employee/obligor left employment voluntarily. The information would be beneficial to local child support enforcement agencies when they are attempting to enforce the order.	Section VII, Termination Reason	Disagree. It is illegal for an employer to provide a reason for an employee's termination. See comment 86
95	02/17/20	APA	Form	1. Entire Form – Added section headers and descriptions regarding who should complete each section - Employers support the additional sectional headers and descriptions to provide clarification and instructions.	Entire Form	Thank you for this comment.

Income Withholding Order Forms Comments

February 13, 2020

#	Date Submitted	Submitted By	Form or Instructions	Comment	Category	Response
96	02/17/20	APA	Form	Section V. Remittance Information – To clarify when to begin withholding, changed the date to a text entry to indicate that the IWO is effective on either the date of mailing, receipt, or service of the order/notice. Added a link to the Remit Payment To textbox to direct employers to state disbursement units to set up electronic payments and requirements for checks <ul style="list-style-type: none"> Both changes are supported by employers as a way to clarify when the order is effective, as well providing links and additional payment related instructions. 	Section V, Effective Date	Thank you for this comment. See comments 49, 59, 85
97	02/17/20	APA	Form	Section VI. Additional Information for Employers/Income Withholders – Simplified and consolidated wording of required advice to employers and moved some wording from Additional Information into Section V. Remittance Information Employers again support this change as it provides needed simplification in this area	Section VI, Consolidated Wording	Thank you for this comment.
98	02/17/20	APA	Form	Section VII. Notification of Employment Termination or Income Status – Moved a link to the Child Support Portal from Additional Information to Section VI. Additional Information for Employers/Income Withholders, Lump Sum Payments and added a link to the Child Support Portal to this section. Added language to encourage voluntary reporting of workers' compensation payments <ul style="list-style-type: none"> Employers appreciate that the changes being proposed in this section will help increase awareness about options related to the Child Support Portal. 	Section VII, Link to Child Support Portal	Thank you for this comment.
99	02/17/20	APA	Instructions	APA supports the proposed changes to the instructions.		Thank you for this comment.

#	Date Submitted	Submitted By	Form or Instructions	Comment	Category	Response
100	02/17/20	APA	Additional Items - Form	On the IWO form, remove "Order ID" (1j), and change "Case ID" to "Case ID / Other ID - This change should also be reflected in the e-IWO record layout and IWO Instructions. Currently in the e-IWO record layout, the Order ID is Optional and 30 characters, Case ID is Required and 15 characters, and Remittance ID is Required and 20 characters. APA requests that OCSE include only two ID fields on both the paper IWO Form and the e-IWO record. If an agency needs three ID numbers, APA suggests lengthening the Case ID field to allow an agency to combine multiple IDs in that field	Section I, Remittance ID, Case ID, Order ID	OCSE defers to the NCCSD Employer Workgroup and will receive their comments and suggestions after they have discussed this topic in depth. See comment 107
101	02/17/20	APA	Additional Items - Form	On the IWO form, add a new check box for "Income Withholding Order / Notice for Support related to an Independent Contractor."	Section I, Independent Contractor	Disagree. Adding an indicator for an independent contractor would require national legislation.
102	02/17/20	APA	Additional Items - Instructions	In the IWO instructions, in the Note to Employer/Income Withholder, add a sentence after, "An acceptable method of determining the amount to be paid on a weekly or biweekly basis is to multiply the monthly amount due by 12 and divide that result by the number of pay periods in a year." The new sentence should convey this information: Occasionally an employer paying weekly or biweekly will experience an extra pay period (53/27 instead of 52/26), and the resulting amount withheld per pay period might not match the amount directed to be withheld on the IWO in fields 13a through 13d.	Section III, Annualized Payments	Disagree. The IWO form contains language in Section III explaining these terms. Existing language: NOTE TO EMPLOYER/INCOME WITHHOLDER: An acceptable method of determining the amount to be paid on a weekly or biweekly basis is to multiply the monthly amount due by 12 and divide that result by the number of pay periods in a year. Additional information about this topic is available in Action Transmittal 16-04, Correctly Withholding Child Support from Weekly and Biweekly Pay Cycles (https://www.acf.hhs.gov/css/resource/correctly-withholding-child-support-from-weekly-and-biweekly-pay-cycles).
103	02/17/20	APA	Additional Items - Form	On the IWO form, in Section IV, add "\$ per daily pay period." Add instructions for the daily calculation amount on the IWO Instructions.	Section IV, Daily Pay	At this point, OCSE is not able to provide guidance on this issue.

#	Date Submitted	Submitted By	Form or Instructions	Comment	Category	Response
104	02/17/20	APA	Instructions	On the paper IWO form, require a valid Federal Employer Identification Number (FEIN), as it is required on the e-IWO. On the IWO Instructions, remove the words "(if available)" in 2c. The FEIN is required in the e-IWO record and should match the paper IWO Form and Instructions. The FEIN is critical in ensuring that the order is processed correctly.	Section II, FEIN	Disagree. OCSE does not want to lose the opportunity for income withholding in those cases where an FEIN is not known.
105	02/17/20	APA	e-IWO	Allow courts or private attorneys to send their non-IV-D child support orders via e-IWO. E-IWO has proven to be an efficient mechanism for orders to be sent to employers, reducing mailing time, which allows money to get to the families faster. Currently, only orders originated by a state IV-D agency can be transmitted via e-IWO. Many large companies, which process the bulk of child support remittances, prefer to use e-IWO.	e-IWO	Disagree. The e-IWO service is designed for IV-D child support agencies receiving federal financial participation. Funding and security issues would not permit this use for non-IV-D cases.
106	02/17/20	APA	e-IWO	In the e-IWO record layout, add the field allowing states to notify employers that withholding is not necessary for the lump-sum payments they have reported. Currently, employers can report lump sum payouts via e-IWO, but a state is unable to respond electronically if there is no need to withhold.	e-IWO	Disagree. OCSE may reconsider this comment in the future. Currently OCSE is developing a match/no match response to lump sum payout reports on the Child Support Portal.

#	Date Submitted	Submitted By	Form or Instructions	Comment	Category	Response
107	02/25/20	NCCSD- Employer Collabora tion Workgrou p	IWO Form & Instructions	<p>As the current president of the National Council of Child Support Directors, I write on behalf of the NCCSD-Employer Collaboration Workgroup regarding the proposed changes to OCSE's income withholding form and the instructions to the form. These comments reflect the collective response of the Workgroup and not NCCSD as a whole nor the separate child support programs or employers represented on the Workgroup.</p> <p>The Workgroup is committed to continuing to research the possibility of reducing the number of identifiers currently captured in the IWO. We believe it is possible to reduce the three current identifiers to at least two. However, to ensure a seamless transition for states and employers, we will need more time to pursue this possibility. Therefore, we do not currently recommend any change in the identifiers.</p> <p>We understand there may be a chance for OCSE to approve an off-cycle change to the IWO and instructions. We look forward to sharing the results of our work with your office in the event such a change could be implemented.</p>	Section I, Remittance ID, Case ID, Order ID	OCSE defers to the NCCSD Employer Workgroup and will receive their comments and suggestions after they have discussed this topic in depth. See comment 100

