

#	Date Submitted	Submitted By	Form or Instructions
1	7/15/2020	Oregon	Form
2	7/15/2020	Oregon	Form
3	7/15/2020	Oregon	Form
4	7/15/2020	Oregon	Form
5	7/13/2020	APA	Additional Items - Form
6	7/13/2020	APA	Additional Items - Instructions

7	7/13/2020	APA	Instructions
8	7/13/2020	APA	Additional Items - Form
9	7/13/2020	APA	Instructions
10	7/13/2020	APA	e-IWO
11	7/13/2020	APA	e-IWO
12	7/14/2020	Missouri	Form

13	7/14/2020	Missouri	Form
14	Missouri	Missouri	Addition - Form
15	7/14/2020	Missouri	e-IWO

16	7/14/2020	Missouri	Form
17	7/14/2020	Missouri	Instructions
18	7/14/2020	Missouri	Instructions

19	7/14/2020	Missouri	Instructions
20	7/14/2020	Missouri	Instructions
21	7/15/2020	Michigan	Form

22	7/15/2020	New York	Form
23	7/15/2020	New York	Form
24	7/15/2020	New York	Form
25	7/15/2020	New York	Form
26	7/15/2020	New York	Form
27	7/15/2020	New York	Form

28	7/2/2020	Iowa	Form
29	7/2/2020	Iowa	Form
30	7/2/2020	Iowa	Form
31	7/2/2020	Iowa	Instructions
32	7/2/2020	Iowa	Instructions
33	6/16/2020	ND	Form & Instructions

34	6/17/2020	A Wrye	Form
35	7/7/2020	Minnesota	

Comment	Category
Is the new format to put the OMB # on the top of the form? On the NMSN that was revised earlier this year, it was placed within the Paperwork Reduction Act box. For child support programs and recipients, it would be helpful to place it consistently instead of making changes with each form that is being revised.	OMB Form Number, Expiration Date, and PRA Advice
For consistency, capitalize "of" or change "FOR" to lower case in other options.	Section I, Grammar
Comma after "circumstances" in Note box in Section I and deleted a space between "the" and "Sender" in Section VI	Sections I and VI, Formatting
Add a period after "VIII".	Section VIII, Formatting
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
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

<p>The IWO instructions states in #20 on page 2, "Percentage of Disposable Income. The percentage of disposable income that may be withheld from the employee/obligor's paycheck. It is the sender's responsibility to determine the percentage an employer/income withholder is required to withhold." APA requests greater clarity on the percentage requirement to state that the sender must enter a specific maximum percentage for the Consumer Credit Protection Act (CCPA) limits and not enter a range or just a maximum amount. Employers often receive IWOs that have a percentage range (i.e., 50-65%), which is insufficient for employers to determine the percentage of income to withhold.</p>	<p>Section V, CCPA</p>
<p>On the IWO form, in Section IV, add "\$ per daily pay period." Add instructions for the daily calculation amount on the IWO Instructions.</p>	<p>Section IV, Daily Pay</p>
<p>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.</p>	<p>Section II, FEIN</p>
<p>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.</p>	<p>e-IWO</p>
<p>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.</p>	<p>e-IWO</p>
<p>We do not support the formatting changes to the placement of the OMB form number, Expiration date, Document Tracking ID and the Paperwork Reduction Act notification to the first page. The new placement crowds the form, especially the Paperwork Reduction Notice which is very small font and difficult to read. As there appears to be ample space for this information on page 4, we recommend return it to its previous position; unless there is a substantiated reason for all of these changes in placement, we recommend all be returned to their previous positions on the Income Withholding Order/Notice for Support.</p>	<p>OMB Form Number, Expiration Date, and PRA Advice</p>

<p>As stated in Missouri's previous comments Missouri remains concerned about the required programming changes that may be necessary for the new text field in Section V. Remittance Information which requires the effective date to now be expressed as "service, "receipt" or "mailing" of the order/notice. Missouri continues to anticipate additional programming would be necessary within our case management system to populate this field differently based on whether the IWO is mail (populate as "mailing") or sent electronically via eIWO ("receipt").</p>	<p>Section V, Effective Date</p>
<p>We suggest returning the definition of disposable income that has been removed from this proposed IWO form. We recommend that the definition of disposable income as "the net income after mandatory deductions such as : state, federal, local taxes; Social Security taxes; statutory pension contributions; and Medicare taxes" be returned back to the form with suggested placement in Section V. on page 2. In addition we encourage returning the statement that the employer may need to consider amounts paid for health care premiums in determinating disposable income and withholding limits to the IWO form that has been removed in this proposed version. We suggest an appropriate placement would be within the rest of the withholding limit information under Section V on page 2. We believe both the disposable income definition and the health care premium references are relevant information that assist the employer in withholding determinations.</p>	<p>Section VI, Additional Information</p>
<p>We suggest expanding the corresponding eIWO character length for the Liability, Anti discrimination and Supplemental Information fields under Section VI. on page 3. Our state has difficulty fitting the desired state-specific information within the 160-character length limit for these fields.</p>	<p>Section VI, Additional Information</p>

<p>In the "To Employer/Income Withholder" section under Contact Information in Section VIII., we would prefer the "Send termination/income status notice and other correspondence to" line to be listed before the "If you have questions, contact" line. We are finding that the primary reason employers utilize this section is not for questions but to obtain information to return termination/income status notices and employers are using the fax number intended for questions for this purpose. This causes issues in Missouri as we utilize different fax numbers for questions versus termination/income status notices. We also strongly recommend adding a separate fax number field to the "Send termination/income status or other correspondence to" line rather than just an address since employers often prefer to return that completed page 4 back via fax rather than mail. Missouri currently includes a fax number along with the address on the address information line but it would be preferable for the form to have an actual field identified.</p>	<p>Section VIII, Contact Information</p>
<p>As advised in our previous comments to the proposed IWO changes published in the December 18, 2019 Federal Register, Missouri continues to express concern with the NOTE TO SENDER textbox after Instruction 21 on page 5 regarding the SDU address and Remittance ID instruction. This will impact Missouri from both from 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 beyond the two business days as federally required.</p>	<p>Section V, Remittance Information</p>
<p>Page 6 of the instructions is incorrectly numbered as page 7.</p>	<p>Formatting</p>

<p>The statement under Section VII. that "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)(1)(x), employers are required to provide the name and address of the noncustodial parent's new employer, if known. We suggest changing this wording to "The employer must provide the name and address of the noncustodial parent's new employer, if known, and may report other new payment sources such as workers' compensation, if known."</p>	<p>Section VII</p>
<p>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. If this will allow us to program for the paper process and electronic process at the same time</p>	<p>e-IWO</p>
<p>We (Michigan Office of Child Support) are concerned about the placement of the OMB form number and expiration date. We believe that having the expiration date on the form causes confusion for employers and other income withholders. The proposed placement at the top-right corner of the form is much more prominent than its placement in the footer and may exacerbate confusion.</p> <p>1) Employers and other income withholders such as small, family-run businesses and those that have never received support withholding orders/notices before, and those who have limited exposure to income withholding for support may interpret the form expiration date as the date income withholding ends. Ending withholding prematurely could be detrimental to families receiving support. This could also cause IV-D agencies to take inappropriate enforcement action against the support obligor or the employer/income withholder.</p> <p>2) The expiration date is also confusing for employers/income withholders during the time between the revised form being published at the federal level with a new expiration date and the time state IV-D programs implement the changes in their systems. State IV-D programs typically have additional time (e.g., six months or a year) to implement changes in their systems. In the interim, employers/income withholders may think that the forms issued previously are no longer valid or forms newly issued with the prior expiration date are not valid. Again, prematurely ending support withholding can be a detriment to support recipients and can result in unnecessary enforcement action.</p> <p>We suggest the form not include an expiration date. Or, if that is not an option, it not be placed in the proposed location, but rather in a less prominent position such as the footer.</p>	<p>OMB Form Number, Expiration Date</p>

<p>The form has been modified to include a text box with the OMB number and expiration date at the top of page 1. NYS OTDA recommends the text box be resized to ensure that the actual date of expiration is visible.</p>	<p>OMB Form Number, Expiration Date, and PRA Advice</p>
<p>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.</p>	<p>Expiration Date</p>
<p>NYS OTDA notes that the header on page 2 and subsequent pages does not contain a data field for "Remittance ID." Because the Remittance ID must be included with the payment, NYS OTDA recommends consideration be given to the inclusion of a field for "Remittance ID" in the header on page 2 and subsequent pages.</p>	<p>Header</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>	<p>Section V, Contradiction, CCPA</p>
<p>The final sentence in the Remit Payments box provides a hyperlink to where contacts and information are found. However, only some of the hyperlink text is displayed. NYS OTDA recommends the Remit Payments box be resized to ensure all the hyperlink text is displayed.</p>	<p>Section V, Remittance Information</p>
<p>The Lump Sum Payments paragraph concludes by reiterating that child support payments may not be made through the federal Office of Child Support Enforcement portal. Because this information is provided in the Payments paragraph, which is positioned immediately above the Lump Sum Payments paragraph, NYS OTDA recommends the elimination of this duplicate instruction.</p>	<p>Section VI Additional Information for Employers/Income Withholders, Lump Sum Payments</p>

<p>1. Entire Form a. Added section headers and descriptions regarding who should complete each section We agree with this change.</p>	<p>Entire Form</p>
<p>Placement of OMB Number and Expiration Date: Now located in a box on the top right corner of the IWO federal form. We do not agree with this change. This location interferes with the two dimensional barcode that is required to be located on the top right corner of our forms in order to print properly. A change in location of the OMB Number and Expiration Date to the top right corner would eliminate our ability to use an automated process to print and mail these forms. If possible, we would prefer the location be on the top left of the form, or returned to the bottom of the form, where it fits more easily.</p>	<p>OMB Form Number, Expiration Date, and PRA Advice</p>
<p>Placement of the Paperwork Reduction Act Language: Moved from the bottom of page 4, to the bottom of page 1. We do not agree with this change. Adding this information to the bottom of the first page causes overcrowding and makes it more difficult to read the information needed for income withholding. Since it also requires the movement of the OMB Number and Expiration Date to the top right corner, it prevents us from being able to use automated print capabilities on this form. Iowa cannot fit all of this information in the box that is used on the proposed document, as there is no space at the bottom of the page. Since this statement is purely informational and not used as direction to the income provider or the sender regarding amounts to withhold and how to withhold, we would like to see it moved to the bottom of a page that has more white space, perhaps page 3 or return it to page 4.</p>	<p>OMB Form Number, Expiration Date, and PRA Advice</p>
<p>Entire Instructions: a. Clarified those fields that are optional We agree with this change and appreciate the clarification. b. Amended section headers and descriptions regarding who should complete each section We agree with this change.</p>	<p>Entire Instructions</p>
<p>Remittance Information: a. 18. Implementation date of "service", "receipt", or mailing, rather than a date. We agree with this change.</p>	<p>Section V, Remittance Information</p>
<p>On behalf of the North Dakota child support program, I am writing to thank the Office of Child Support Enforcement for considering our previous comments and incorporating them in this version. We are supportive of the changes proposed in this version.</p>	<p>Entire form & Instructions</p>

<p>A larger font needs to be used for the information such as Employee/Obligor's Name that is contained in the box on page 1. The current font is so small it makes reading the Employee's Name and Social Security Number difficult.</p>	<p>Section III</p>
<p>Although this comment does not pertain to a proposed change to the IWO form, the Minnesota Department Of Human Services Child Support Division would like to see additional changes made to the form and instructions so it is clear that the form applies to both employers and other payers of funds/income withholders. Often non-employer payers of funds/income withholders return the form to the child support agency indicating it is inapplicable to them as they are not employers. Additional references to general "payers of funds" or other "income withholders" on the form and in the instructions would reduce confusions in many cases and increase processing efficiency</p>	<p>Entire form</p>

Response	Comment # in 60 Day Notice Comments
OMB now requires that the expiration date be on page one, so this has been implemented. See comments 12, 21, 22, 29, and 30.	
Agree with capitalizing "of."	
Disagree with adding a comma after "circumstances."	
Agree with adding a period after the section number.	
We received this comment previously in the 60 day comment period. Disagree as adding an indicator for an independent contractor would require national legislation.	101
<p>We received this comment previously in the 60 day comment period. Disagree because the form contains language in Section III explaining these terms.</p> <p>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).</p>	102

<p>Agree to add to the IWO Instructions #20 that senders must enter a specific percentage of disposable income and not a range of percentages.</p>	
<p>We received this comment previously in the 60 day comment period. Disagree because the IWO can be used as is for this situation.</p>	<p>103</p>
<p>We received this comment previously in the 60 day comment period. Disagree because OCSE does not want to lose the opportunity for income withholding in those cases where an FEIN is not known.</p>	<p>104</p>
<p>We received this comment previously in the 60 day comment period. 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.</p>	<p>105</p>
<p>We received this comment previously in the 60 day comment period. Disagree although 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.</p>	<p>106</p>
<p>OMB now requires that the expiration date be on page one, so this has been implemented. The Document Tracking ID is on page 1 of the current form version. See comments 1, 21, 22, 29, 30.</p>	

<p>We received this comment previously in the 60 day comment period. Disagree because 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 th e-IWO record layout that date of mailing and date of receipt are the date of transmission to the employer. See comment 32 supporting this change.</p>	<p>59</p>
<p>We received this comment previously in the 60 day comment period. Disagree. States have varying definitions of disposable income. The Consumer Credit Protection Act link was added to assist states and employers/income withholders.</p> <p>Agree with adding the health care premium reference to the IWO instructions in Section V, Notes to Employer/Income Withholder text box.</p>	<p>Health care premium statement - 60</p>
<p>We received this comment previously in the 60 day comment period. Disagree with adding to the character length of e-IWO fields because this affects all states and employers using e-IWO and minimal changes should occur to avoid costs to both states and employers.</p>	<p>65</p>

<p>Disagree with changing the order of the contact information because only one commenter suggested this, and automated system changes would be required.</p>	
<p>We received this comment previously in the 60 day comment period. 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.</p>	<p>71</p>
<p>OCSE will fix the page number in the final copy.</p>	

<p>Disagree. The instructions on the face of the IWO form are clear.</p>	
<p>We received this comment previously in the 60 day comment period. Agree with publishing the IWO form, Instructions, and e-IWO Record Layout at the same time.</p>	<p>74</p>
<p>OMB now requires that the OMB # and expiration date be on page one, so this has been implemented. See comments 1, 12, 22, 29, and 30.</p>	

<p>OMB now requires that the expiration date be on page one, so this has been implemented. See comments 1, 12, 21, 29, and 30.</p>	
<p>We agree that this change will be made on the final version of the form.</p>	13
<p>Disagree with adding the Remittance ID to the header because only one commenter suggested this.</p>	
<p>We received this comment previously in the 60 day comment period. 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.</p>	14
<p>Agree that this change will be made with the final version of the form.</p>	
<p>We disagree with the suggestion to remove the statement that payments cannot be made with the Child Support Portal as we receive many requests daily from employers wishing to make payments via the Portal.</p>	

Thank you for this comment.	
OMB now requires that the OMB number and expiration date be on page one, so this has been implemented. See comments 1, 12, 21, 22, and 30.	
OMB now requires that the PRA language be on page one, so this has been implemented. See comments 1, 12, 21, 22, and 29.	
Thank you for these comments.	
Thank you for this comment. See comment 13.	
Thank you for this comment.	

<p>Disagree with using larger font because increasing the font will increase the length of the document and only one commenter suggested this.</p>	
<p>Disagree with adding text to clarify that withholding applies to employers and income withholders because income withholders are included on the form and only one commenter suggested this.</p>	