

Intergovernmental Reference Guide (IRG)

**OMB Information Collection Request
0970 – 0209**

Supporting Statement Part A - Justification

November 2021

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

1. Circumstances Making the Collection of Information Necessary

The Office of Child Support Enforcement (OCSE) maintains the Intergovernmental Reference Guide (IRG), a centralized and automated repository of state and tribal profiles that contains high-level descriptions of each state and tribal child support enforcement (CSE) program and its procedures. These profiles provide state, tribal, and foreign country CSE agencies with an effective and efficient method for updating and accessing information needed to process intergovernmental child support cases.

The IRG information collection activities are authorized by:

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

This request is for a three-year approval of a currently approved information collection with revisions, including revisions to the content and organization of the state profile questions and minor organizational changes to the tribal profile with no changes in content. (See A.15 for the explanation of the revisions).

2. Purpose and Use of the Information Collection

The information in the IRG contains high-level descriptions of each state and tribal CSE program policies and procedures that can be quickly accessed, which allows processing intergovernmental child support cases more effectively and efficiently. The IRG improves the accuracy of available CSE information and eliminates the need to call another state or tribe to process a case.

3. Use of Improved Information Technology and Burden Reduction

The IRG profile information is available to the public and is accessible through OCSE's website. Authorized users must log in, allowing state and tribal CSE agencies to update information as changes occur. Ease of updates by agencies and public accessibility by users reduces time and costs that would otherwise be spent searching for information on individual CSE agency cases, thereby expediting case processing.

4. Efforts to Identify Duplication and Use of Similar Information

The IRG is unique as there is no other central source available for state and tribal child support agencies to input and access child support information to assist in processing intergovernmental child support cases.

5. Impact on Small Businesses or Other Small Entities

There is no impact on small businesses as only state and tribal CSEs answer the profile questions.

6. Consequences of Collecting the Information Less Frequently

Timely collection and dissemination of IRG information are vital to ensure that the most comprehensive and current information is available to facilitate the efficient and effective processing of intergovernmental child support cases. Collecting IRG information less frequently, or not at all, will increase CSEs' costs and negatively impact or delay case processing and child support collections.

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

There are no special circumstances.

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

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), OCSE published a notice in the Federal Register at 86 FR 41042. The notice announced OCSE's intention to seek OMB approval of revisions to the currently approved collection of information and to provide a 60-day comment period for the public to submit in writing any comments about this information collection activity.

OCSE received comments from state child support enforcement agencies, two child support associations, and two private organizations regarding the organization of the material and suggested clarifications to the proposed state profile questions.

There were also suggestions for new state profile questions.

No comments were received regarding the tribal profile organizational changes.

OCSE thanked each commenter, incorporated organizational and content clarifications to the proposed state profile questions, and affirmed that suggestions for new state profile questions would be considered at an upcoming workgroup meeting. OCSE is dedicated to keeping the IRG data up to date with state policies and procedures by conducting reviews of the state

profile questions to ensure the information on the IRG is displayed correctly. In 2020, OCSE formed an IRG Policy Workgroup, which continued through mid-2021, composed of OCSE central, regional, and several states’ representatives. The current proposed revisions to the IRG are based on consultation with this workgroup. Over the next year, the IRG Policy Workgroup will convene to review all new questions proposed in response to this request for comments. Once this process is complete, OCSE will allow for public comment on the revised version of the IRG and submit the revision for OMB review.

Attachment A includes comments received and OCSE responses based on guidance provided by the IRG Policy Workgroup. The document also contains a complete list of the proposed new questions and potential implications.

9. Explanation of Any Payment or Gift to Respondents

There are no payments or gifts to respondents.

10. Assurance of Confidentiality Provided to Respondents

The IRG does not contain sensitive case data, but it does collect contact information for state, tribal, and international CSE agencies. Access to state or tribal CSE’s contact information on the IRG is restricted to authorized state and tribal users.

11. Justification for Sensitive Questions

Not applicable.

12. Estimates of Annualized Burden Hours and Costs

Fifty-four states and 62 tribes contribute information to the IRG. Agencies generally provide an initial response and then submit updates to their information on average about 18 times per year. Updates average about 18 minutes (.3 hours).

Information Collection Instrument	Total Annual Number of Respondents	Total Annual Number of Responses per Respondent	Average Annual Burden Hour per Response	Annual Burden Hours	Average Hourly Wage	Annual Cost
Intergovernmental Reference Guide: State Profile Guidance	54	18	0.3	292	46.56	13,596
Intergovernmental Reference Guide: Tribal Profile Guidance	62	18	0.3	335	46.56	15,598
Estimated Annual Burden Total				627	Estimated Annual Cost Total	29,194

The job code is 21-1021, with an hourly wage of \$23.28 per hour. The increase in the total annualized costs from the previous approval is due to a slight increase in the hourly wage rate estimate derived from the most current Bureau of Labor Statistics figures (<https://www.bls.gov/oes/current/oes211021.htm>) and to the inclusion of fringe benefits and overhead. To account for fringe benefits and overhead, OCSE multiplied the hourly rate by two, resulting in an average hourly wage of \$46.56.

The estimated annualized cost to respondents for the burden is \$46.56 times 627, or \$29,194.

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

There are no other costs to the respondents.

14. Annualized Cost to the Federal Government

The total annualized cost to the federal government for the IRG is \$895,000. This includes federal salaries and benefits of \$80,000 and contractor and hardware/software costs of \$815,000. The costs to the federal government and the estimates for federal salaries and benefits have increased since the last approval.

15. Explanation for Program Changes or Adjustments

In 2020, OCSE formed a workgroup, which continued through mid-2021, composed of several states' representatives and OCSE regional and central office staff, who reviewed, revised, consolidated, and reorganized the 339 state profile questions on the IRG. This effort resulted in a streamlined state profile of 180 questions, organized by alphabetical program order (section labels A-N were eliminated).

OCSE made additional minor organizational updates and clarified some of the proposed questions in the streamlined version based on comments received during the 60-day comment period.

The state profile revisions constitute a change in the number of questions and the organization of the information. The reorganization and consolidation do not affect the burden hours because the average amount of time it takes to answer questions in the state profile remains the same. Respondents are not required to answer any of the 180 questions in the state profile; however, if a respondent does choose to respond, they will typically do so only one time. Occasionally, a respondent may amend their initial answers.

The tribal profile questions did not change (section labels A-D were eliminated). The organizational revision in the tribal profile does not change the burden. The average time it takes to answer questions in the tribal profile remains the same. Tribal respondents are not

required to answer the questions, but if a respondent does choose to respond, they will typically do so only one time. Occasionally, a respondent may amend their initial answers.

Proposed revisions to the IRG are intended to improve the quality of state, tribal, and foreign country profile information, which will assist in more efficient and effective intergovernmental child support case processing.

16. Plans for Tabulation and Publication and Project Time Schedule

There are no plans for tabulation and publication.

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

The expiration date will be displayed.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to certification for the PRA submission.