

Public Comments and Office of Child Support Enforcement Responses

Intergovernmental Reference Guide (IRG)

(OMB #0970-0209)

The Administration for Children and Families Office of Child Support Enforcement (OCSE) published a notice in the Federal Register on July 30, 2021, inviting comments on proposed changes to and an extension request for Intergovernmental Reference Guide (IRG) (OMB #0970-0209). OCSE received 12 sets of comments. The table below summarizes the comments received and OCSE’s responses.

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. Over the next year, the IRG Policy Workgroup will convene to review all new questions proposed in response to this request for comments. The chart below lists decisions and guidance provided by the IRG Policy Workgroup and the new proposed questions and potential implications. 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. A full list of just the proposed new questions follows the table that outlines all comments and OCSE responses.

SECTION: AUTOMATED ADMINISTRATIVE ENFORCEMENT IN INTERSTATE CASES (AEI)			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
OHIO-Warren County	In question 2, it would be helpful to clarify: <ul style="list-style-type: none"> • Specific data elements required to successfully assist • How are appeals and contests handled? • Will the assisting state require the requestor to pay fees? 	AEI is a statutorily required procedure under 466(a)(14). However, it is not easily implemented in some states and seems to be rarely used. The revised version includes AEI as a required limited service, which should help streamline AEI requests.	No changes made to the question, but the User Guides will provide clarification for users and hover-overs within the IRG will provide additional information.
OHIO-CSEA Director's Association	Please consider adding in a section on how appeals are handled. Please consider adding in what specific data elements are required to assist with the request successfully.	Thank you for these recommendations, OCSE will ask the IRG Policy Workgroup to review this suggestion.	The IRG Policy Workgroup will review for consideration
SECTION: CREDIT REPORTING			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
Indiana	CSB suggests rewording the following question for clarity:	The proposed revision provides clarity. "Can a noncustodial parent who no longer has a past-	Revisions incorporated.

	<p>“How can a noncustodial parent who no longer has a past-due account be removed? Or does the noncustodial parent continue to be reported regardless of the dollar amount owed?”</p> <p>CSB offers the following suggested rewording of the above question for consideration:</p> <p>“Can an obligor who no longer has a past-due account have the report removed from the credit bureau? If so, what must the obligor do?”</p>	<p>due account have the report removed from the credit bureau? If so, what must the noncustodial parent do?”</p>	
Oregon	<p>Question 3: Although this is an existing question (J16) in the current IRG, the phrase “method for reporting” is somewhat ambiguous. It could be read as the technical method (e.g., outbound credit reporting file), but the reference to “judicial, administrative, or both” suggests that’s not the question. We believe this is referring to the process for notice and right to object. If so, we recommend the question be phrased more explicitly to the notice and objection process.</p>	<p>Based on responses to the existing question (J16), the OCSE Division of Policy and Training does not believe there is confusion over the intent of the question.</p>	<p>No changes will be made to the question, but the User Guides will provide clarification for users and hover-overs within the IRG will provide additional information.</p>
ERICSA	<p>Question 4: How can a noncustodial parent who no longer has a past-due account be removed? Or does the noncustodial parent continue to be reported regardless of the dollar amount owed?</p> <ul style="list-style-type: none"> •Recommendation: please reword the question to clarify what is meant by “be removed” Proposed revision: Can a noncustodial parent who no longer has a past-due account have the report removed from the credit bureau? If so, what must the noncustodial parent do? 	<p>The proposed revision provides clarity. "Can a noncustodial parent who no longer has a past-due account have the report removed from the credit bureau? If so, what must the noncustodial parent do?"</p>	<p>Revisions incorporated.</p>
SECTION: CSENet			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
North Dakota	<p>We suggest entitling this category "Case Closure" and moving questions 5 and 6 pertaining to interest to Support Details, or in the alternative, to a new standalone section entitled "Interest" that also includes questions 2, 3, and 4 from Support Details.</p>	<p>This section was previously titled “Case Closure.” Based on the IRG Policy Workgroup discussion it was agreed that this section is about CSENet transactions and not about case closure or interest procedures.</p>	<p>No changes made</p>
North Dakota	<p>We understand there is variation among the states regarding the use of CSENet to communicate with</p>	<p>Thank you for these recommendations, OCSE will ask the IRG Policy Workgroup to review these</p>	<p>The IRG Policy Workgroup will review for consideration.</p>

	<p>other states. Some states send and receive CSENet transactions. Some states receive CSENet transactions but do not send them. Some states do not use CSENet to communicate with other states and instead send a Child Support Enforcement Transmittal #2 – Subsequent Actions. Although it may seem simplistic, because of the practical variations, we suggest adding the following question, (NEW) "Does your state use CSENet transactions to communicate with other states?" If the state responds "No" to this question, it may be helpful to inquire what that state's preferred method of communication is in interstate cases. If the response is not consistent statewide (e.g., if there are only certain counties within the state that do not use CSENet), that information would also be useful. We also suggest adding the following question, (NEW) "When your state is the responding state, does it send a CSENet transaction to acknowledge receipt of an initial intergovernmental referral?" It is our experience that some states do, and some states do not.</p>	suggested new questions.	
Oregon	<p>Question 4: When your state is the responding state, does it send a CSENet case closure transaction to notify the initiating state that, per its request, the case is closed, and your state has stopped its income withholding order? (MSC P GSC18; 45 CFR 303.7(d) (9).))</p> <ul style="list-style-type: none"> •Recommend removing extra close parenthesis after the citation. 	Thank you for this recommendation.	Extra close parenthesis was deleted.
SECTION: COPIES OF ORDERS AND PAYMENT RECORDS			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	DECISION
ERICSA	<p>Expand this section to include how states address all limited-service requests, not just obtaining orders and payment history. Include how to obtain copies of birth certificates and paternity acknowledgments, what action the state takes for requesting for service pf process and related cost, how generic testing can be coordinated, requirements for teleconference participation, etc. Also, include whether the state can</p>	<p>Thank you for these recommendations, OCSE will ask the IRG Policy Workgroup to review the suggestion to add a limited services section. Currently, we carry over these limited services items from the current version of the IRG.</p> <p>Questions about birth certificates and paternity acknowledgment are questions 8 and 9 in the</p>	The IRG Policy Workgroup will review for consideration

	forward payments without a two-state action.	paternity section. The Workgroup will consider adding 1) genetic testing, 2) payment forwarding, and 3) Service of process. Additionally, a question on teleconferencing will be considered.	
FLORIDA	Suggested Add: 1- How to obtain copies of birth certificates and paternity acknowledgments 2- Description of special requirements for telephonic pr video participation in two-state actions. 3- Whether the state can forward payments without initiating a two-state action.	Proposed Question 1 is covered under parentage questions 8 and 9. 303.7(a)(8) requires providing these documents as a limited service, so they are a standalone item.	No changes will be made for the proposed question 1.
		Similar questions to proposed Question 2 were deleted under current section H because all states have UIFSA 2008 that indicates that the physical presence of the non-resident party is not required. Also, the area of electronic communication is evolving rapidly. Therefore, the Workgroup determined the question on the IRG was not valuable. However, we will consider adding the proposed new question, since it slightly differs and describes state requirements.	The IRG Policy Workgroup will review proposed question 2 for consideration.
		Proposed Question 3. While this may be a practical question for some states, from a policy perspective, all states must be able to forward payments without opening a two-state case. See AT-17-07.	No changes will be made for the proposed question 3.
North Dakota	We suggest specifically asking whether the assisting agency will secure copies of court orders and payment records. For example, some states will not assist with securing copies of certified court orders and will instead direct the requesting jurisdiction to contact the court directly. It is likely intended that this information be included in the response to question 1, but without specifically asking for it, we are concerned that the information may be glossed over. It would be helpful to have this information on the IRG so that	States will provide these specifics when answering the questions currently included in the IRG.	No changes made to the IRG, but the User Guides will provide clarification for users and hover-overs within the IRG will provide additional information.

	time can be saved waiting for a response to a limited-service request when the assisting state does not actually provide the assistance requested.		
Indiana	<p>CSB suggests the inclusion of the following additional questions to this section:</p> <ul style="list-style-type: none"> • What are the procedures and associated costs for obtaining a birth certificate? • What are the procedures and associated costs for obtaining a paternity affidavit? <p>Additionally, if questions can be in multiple sections on the IRG, then Questions 8-9.1 from the Paternity/Parentage Section should be added here. Finally, CSB suggests that if the above suggestions are accepted and additional questions regarding other documents are added to this section, that it be renamed to "Copies of Orders, Payment Records, and other Documentation."</p>	<p>Thank you for these recommendations, OCSE will ask the IRG Policy Workgroup to review these suggested new questions and renaming of any of the program area sections.</p> <p>As noted, questions 8 and 9 are already included in the Paternity Establishment section and we would prefer to not include redundant questions.</p>	<p>Questions 8 and 9 will not be repeated.</p> <p>The IRG Policy Workgroup will review the proposed new questions.</p>
SECTION: COST AND RECOVERY			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	DECISION
Missouri	<p>Missouri collects the \$35 annual federal fee by retaining \$17.50 from the support collected for the person receiving support and bills (recovers) \$17.50 from the person paying support.</p> <p>We understand that the IRG cannot fit all scenarios, and Missouri will be able to populate the 3 through 3.4 questions in the proposed IRG without issue; however, it is worth noting that Missouri has a unique situation in which an "other" option would also suffice.</p>	Thank you for these recommendations. OCSE will ask the IRG Workgroup to consider adding additional space for comments and review the functionality.	The IRG Policy Workgroup and the OCSE IT team will review the functionality suggestions.
Oregon	Question 3: Consider allowing space for comment on each option or adding a 3.5 for additional comment or explanation.	Thank you for these recommendations. OCSE will ask the IRG Workgroup to consider adding additional space for comments and review the functionality.	The IRG Policy Workgroup and the OCSE IT team will review the functionality suggestions.
SECTION: DISTRIBUTION			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
Ohio	It might be helpful to address the distribution of	The distribution of futures payments and	No changes will be made.

Warren County	futures or overpayments as well.	overpayments is too complex for IRG questions.	
Ohio - CSEA Director Association	Please consider adding a question to ask how the state handles cases where a payor has overpaid child support, and how the state handles distribution when the case has a futures balance.	This is too complex to address in the IRG.	No changes will be made.
SECTION: Duration of Support			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
Ohio	Question 6 describes a child's de facto "emancipation," but the use of the term in Question 5 seems inaccurate as an umbrella term for reasons why a child support order might terminate earlier than the typical term of duration. For example, in Ohio, it would cover the marriage of the child or military enlistment but does not describe other reasons like deportation, death, or adoption. <ul style="list-style-type: none"> •Consider: "What are your state's laws regarding the emancipation of the child conditions that would result in early termination of the child support obligation? Describe." 	The word "emancipation" is a legal term; a state should answer according to state law. Substituting the word "conditions" is not legally precise and would lead to confusion. In addition, Question 5 and 6 are open text box responses that would allow Ohio to describe various situations/scenarios in Ohio.	No changes made to the questions, but the User Guides will provide clarification for users and hover-overs within the IRG will provide additional information.
Florida	We suggest adding a question in this category about whether the duration of support is a modifiable aspect of the order under the state's law. For example, "Does your state law allow the duration of support to be modified?" This would assist our workers in quickly determining whether our state has the authority to modify the duration of support provision in existing orders.	This is a UIFSA interpretation issue that needs additional discussion	The IRG Policy Workgroup will review the comment and consider changes to address interpretation issues.
Ohio - CSEA Directors Association	Please consider asking what conditions could be considered under the state's laws regarding early termination of support in questions five and what is required to prove the condition?	This is a UIFSA interpretation issue that needs additional discussion.	The IRG Policy Workgroup will review the comment and consider changes to address interpretation issues.

Oregon	Question 6: Recommend adding the word “from” after “graduates” as the standard usage.	Thank you for the recommendation.	Added “From” after graduates.
SECTION: Family Violence			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
Florida	The question about when a state last updated its policies for the family violence indicator should be deleted.	Thank you for your recommendation. OCSE will ask the IRG Policy Workgroup to review this suggestion.	The IRG Policy Workgroup will review the suggestion.
ERICSA	Question 5: (Private) When did the state last review or updated its policies for the family violence indicator? •Recommendation to remove the question. It is not clear how this benefits another state.	Thank you for your recommendation. OCSE will ask the IRG Policy Workgroup to review this suggestion.	The IRG Policy Workgroup will review the suggestion.
SECTION: Federal Enforcement (Resources)			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
OHIO - Warren County	While the title is accurate, end-users conducting an IRG search might not understand it. Questions 1 and 2 might be clearer if the term "tax offset" or "IRS Treasury offset" is used.	We believe that adding "Resources" to the end of the title will provide clarity for end-users. The term “tax Offset” is the term currently used by OCSE and embedded in OCSE and state systems.	"Resources" added to the end of the title for clarity. The title to this section is now Federal Enforcement Resources . No changes were made to #1 & #2.
Oregon	Questions 1-6 for this section: Recommend replacing "minimal" with "minimum"—minimum is the appropriate word when requesting a precise least amount; minimal is squishier.	This word was changed during the revision process. We have changed back to "minimum."	Changed “minimal” to "minimum."
SECTION: General Program-At-A-Glance			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
Florida	The question about the number of child support offices in the state should be deleted. The question about CSENet should include the types of transactions the state uses.	The states that participated in the IRG Policy Workgroup agreed that including these questions added value. States can view the Exchange Agreement located on the IRG to see other states' transaction types.	No changes will be made.
Missouri	Missouri questions why it is relevant for states to know the number of local child support offices that are in a state, as asked in the question	It was determined by the IRG Policy Workgroup that these questions added value to the IRG.	No changes will be made.
Ohio - CSEA	Please consider asking if the state is state-supervised,	Thank you for your recommendation. OCSE will	The IRG policy Workgroup will review

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Directors Association	state-administered, or state-supervised, county-administered. This makes a difference in how question 3 is answered. For example, Ohio is state-supervised, county-administered and some counties are very administrative, and others are strictly judicial	ask the IRG Policy Workgroup to review this suggestion.	the suggestion.
Oregon	General Program-at-a-Glance Question 2: What is the name of your IV-D agency? •Proposed recommendation: Adding a 2.1 Q: "What is the name of your IV-D program, if different from the name of the agency?"	Thank you for your recommendation. OCSE will ask the IRG Policy Workgroup to review this suggested sub-question.	The IRG policy Workgroup will review the suggestion.
ERICSA	General Program-At-A-Glance Question 1: How many local child support offices are in your state excluding agencies with cooperative agreements? •Recommend removing questions. The number of child support offices in the state doesn't really benefit another state, especially if we are not also counting agencies with cooperative agreements. Question 5: Is your state administrative, judicial, or a combination of both? Does your state primarily use judicial or administrative procedures to establish and/or enforce support orders? Please describe. •Recommend removing - A similar question is asked in the Support Establishment section (question 1) a similar question for the various enforcement sections. This question is not needed here. Question 4: Does your state use the following applications: EDE, CSENET, QUICK? •Recommendation suggests revising the structure of the question to have a state list of which ones are used. For CSENet, this is not a simple yes or no as there are multiple categories of transactions that a state may or may not use.	Thank you for your recommendations on the questions in this section. OCSE will ask the IRG policy Workgroup to review the suggestions.	The IRG policy Workgroup will review the suggestions.
SECTION: Income Withholding			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
Indiana	CSB suggests the inclusion of the following additional question to this section:	Thank you for your recommendation. OCSE will ask the IRG policy Workgroup to review the	The IRG policy Workgroup will review the suggestion

	Do you send IWOs to employers for independent contractors? If so, do you have a special process for deciding the amount to withhold?	suggested additional question.	
Oregon	<p>Question 3: What is the maximum fee for the administrative cost that an employer may charge for processing income withholding orders? (45 CFR 303.100(e)(iii))</p> <ul style="list-style-type: none"> •Recommend adding missing close parenthesis at the end of the citation. <p>Question 14: When your state is enforcing an order and receives payment through income withholding that is not enough to cover the full amount ordered, how does your state apply the payment to the types of support (for example, current, arrears, medical, spousal support, other? Please describe and provide the statutory citations, if appropriate.</p> <ul style="list-style-type: none"> •Recommend adding missing close parenthesis after the word "other" and before the question mark. 	Thank you for your recommendation.	Add closed parenthesis for Q 3 and add Q 14.
ERICSA	Suggest expanding this section to address Employer requirements as well. See recommended new questions below pertaining to employers.	Thank you for your recommendation. OCSE will ask the IRG policy Workgroup to review the suggested expansion of this section.	The IRG Policy Workgroup will review the suggestion.
SECTION: INTERNATIONAL - RECIPROCITY			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
North Dakota	Consider removing "foreign" before "Hague Convention country" in question 2 to be consistent with references to Hague Convention countries in other questions	Thank you for your recommendation. We agree that the word "foreign" should be removed for consistency.	The word "Foreign" was removed in question 2 before "Hague Convention countries".
Oregon	<p>Question 3: Does your state agency accept direct applications for services from individuals residing outside the United States (See UIFSA § 307 - Alternative A), or does your state's law allow discretion in accepting these applications (See UIFSA § 307 - Alternative B)?</p> <ul style="list-style-type: none"> •Recommend moving the question mark to immediately follow the second use of "applications." 	Thank you for your recommendation. OCSE will ask the IRG policy Workgroup to review the suggestion.	The IRG Policy Workgroup will review the suggestion.
		Thank you for your recommendation. OCSE believes the placement of the question mark is appropriate.	No changes will be made.

ERICSA	Suggest combining this section dealing with international case information into one large section that introduces the international section and then has each of the following subsections within an international section.	Thank you for your recommendation. OCSE will ask the IRG policy Workgroup to review the suggestion.	The IRG Policy Workgroup will review the suggestion
SECTION: INTERNATIONAL INFORMATION FOR HAGUE CONVENTION COUNTRIES			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
Florida	Questions that apply generally should be moved from this section and not repeated.	<p>This response applies to all comments and suggestions made under this section.</p> <p>Multiple suggestions for re-organization. The questions in the Hague section have "hover over" explanations that clarify why they are in this section. Generally, questions in this section cover information that is important to our foreign partners and is not covered in other sections of the IRG or not in the same manner as here. It is important to have this section on the IRG because as international child support evolves, it is helpful to have this section for our international partners. The previous version of the IRG had these questions interspersed throughout the sections. Based on feedback from the IRG Policy Workgroup, the questions were reorganized.</p>	No changes will be made.
North Dakota	We suggest moving questions 3 and 4 to Support Order Establishment and question 6 to Duration of Support		
Indiana	<p>1. Indiana suggests that the 3 International sections be combined into one for ease in finding the information.</p> <p>2. Questions 2, 4, 5, 6* under International - Information for Hague Convention Countries: CSB suggests that these questions be moved to or duplicated in the IRG Support Order Establishment Section as they apply to all intergovernmental cases, not just international convention cases.</p> <p>3. Question 6 under International - Information for Hague Convention Countries: CSB suggests that this question be duplicated in the IRG Duration of Support Section</p>		
Missouri	We suggest consolidating the International sections of Reciprocity, Information for Hague Countries, and Payments into one section titled International Case Processing. If it is necessary to keep the required Hague Convention profile questions as a separate section, an alternative could be to keep that section as is and combine the other two international sections.		
ERICSA	<p>These questions are better placed under Support order Establishment as it applies broader than just to convention countries</p> <ul style="list-style-type: none"> •Question 2: Does your state send and receive pleadings and documents electronically in 		

	<p>international cases? If yes, specify the types of pleadings and documents your state can send and receive electronically.</p> <ul style="list-style-type: none"> •Question 4: When establishing a child support order, what can be included as add-ons to the child support guideline amount? Please provide the relevant statutory or case law citation. (See also question 1 under Support Details.) •Question 5: Does your state encourage amicable solutions between parents to promote voluntary payment of support, such as the use of mediation, conciliation, or similar consent processes? If yes, describe. •Question 6: What circumstances will cause your state to end child support before the normal duration? 		
SECTION: LICENSE ENFORCEMENT			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
Iowa	<p>Question four and seven both ask states to list the types of licenses sanctioned. The professional and recreational license types that Iowa CSRU can sanction are so numerous that it is not practical to list them. For example, Iowa CSRU can sanction over 1,000 types of recreational licenses with the Iowa Department of Natural Resources. Iowa CSRU suggests either removing the sentences that ask states to specify the license types or revising them to ask for a summary or examples of the license types.</p>	<p>States can list however many types they deem necessary. The IRG is a generalized tool/resource for states and tribes. The questions are meant to be generally applicable and sometimes open-ended but may not fit unique situations in each state.</p>	<p>No changes will be made to the IRG, but the User Guides will provide clarification for users and hover-overs within the IRG will provide additional information.</p>
North Dakota	<p>In our experience, when we send an outgoing referral for enforcement of a support order to a responding state, some states will require that we terminate any active license suspension processes we have in place. Some will allow the processes to remain active. In addition, some states will not allow the initiating state to proceed with the suspension of a license the obligor may acquire in the initiating state while an intergovernmental referral for enforcement to the responding state is open.</p>	<p>Thank you for your recommendation. OCSE will ask the IRG policy Workgroup to review the suggested additional questions.</p>	<p>The IRG policy Workgroup will review the suggestions.</p>

	<p>We suggest adding the following questions: (NEW) When your state is the responding state for enforcement, will you allow the initiating state to maintain an active license suspension process while the interstate referral is open? (NEW) When your state is the responding state for enforcement, will you allow the initiating state to initiate a license suspension process while the interstate referral is open? It would be helpful to have this information when considering whether to make an intergovernmental referral for enforcement. It would also clarify what steps may need to be taken when preparing a referral to the responding state and what actions we may take while the referral is open.</p>		
Indiana	CSB suggests that an additional question asking for a list of all possible licenses be added as the first question of this section.	The list/types are a part of questions 4 and 7.	No changes will be made.
ERICSA	The expansion of information for additional license types is beneficial to states. Creating separate sections for various enforcement remedies is beneficial to states.	Thank you for your recommendation. OCSE will ask the IRG policy Workgroup to review the suggested additional questions.	The IRG policy Workgroup will review the suggestion.
SECTION: LUMP SUM PAYMENTS			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
Oregon	<p>Question 1: What are the criteria for initiating/filing a lien in your state? •Recommend adding a comma between "lump sum" and "if."</p>	Thank you for your recommendation.	Added a comma between "lump sum" and "if."
SECTION: MODIFICATION AND REVIEW/ADJUSTMENT			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
North Dakota	It would be helpful to include information in the IRG regarding nonmodifiable aspects of orders to ensure states comply with the Uniform Interstate Family Support Act section 611. Thus, we suggest adding the following question to this category, (NEW) "When your state is the issuing state, are there	This is a UIFSA interpretation issue.	The IRG policy Workgroup will review the suggestion and consider changes to address interpretation issues.

	<p>any aspects of a child support order that may not be modified under your state's law (See UIFSA § 611)? If yes, please describe."</p>		
<p>Center for Policy Research</p>	<p>Question 1: How frequently does your state conduct order reviews in IV-D cases (for example, every year or every three years)? (See 45 CFR 303.8.)</p> <ul style="list-style-type: none"> •Proposed Action: Revise according to edits. PA and non-PA should be separated since PA reviews are required at least every three years, and non-PA reviews are required at least three years upon request. <p>Proposed Revision: How frequently does your state conduct order reviews in IVD public assistance (PA) cases (for example, every year or every three years) (See 45 CFR 303.8)</p> <p>Question 2: What is your state's modification procedure? Briefly describe.</p> <ul style="list-style-type: none"> •Proposed Action: Delete the current question and (add the new questions below) Rather than ask about the procedures for order modification, it would be useful to ask specific questions about the criteria used for order modification. See new questions below. •Proposed new Question2: How frequently does your state allow order reviews in IV-D non-PA cases when there is not a change in circumstance? •Proposed new Question 2.1: Does your procedure require a request from a party to review an order in an IV-D Non-PA case? If so, must the request be signed by the party? •Proposed new Question 2.2: Can the IV-D agency initiate a review in an IV-D non-PA case without a request from the party (e.g., based on data from automated sources that the parent is receiving unemployment or SSI)? •Proposed new Question 2.3: At what point in the process must a party submit documentation of a change of circumstance (i.e., at the point of requesting a review or when the actual review is being conducted)? 	<p>The IRG is a generalized tool/resource for states, tribes, and international caseworkers. not researchers. The main focus of the IRG is providing policies and procedures for interstate case management.</p>	<p>No changes will be made to the question, but we will include the recommendations in the IRG Policy Workgroup discussion.</p>

	<p>Question 3: What are the criteria for modification under your state's guidelines (for example, a change that is more than \$50 or 20% upward or downward from the current amount ordered)?</p> <ul style="list-style-type: none"> Proposed Action: Revise according to edits. Adding quantitative will help clarify this criterion from others. This criterion isn't always in a state's guidelines. Add 3.1 New Question: Is there a different quantitative criterion set in the agency rule for IV-D orders. If so, what is it? <p>What are the quantitative criteria for modification under your state's guidelines (for example, a change that is more than \$50 or 20% upward or downward from the current amount ordered)? Are the criteria set in your state guidelines? Also, A state can establish different quantitative criteria for PA and non-PA cases.</p> <p>Question 4.4: The cost of living, as measured by the Federal Bureau of Vital Statistics U.S. Bureau of Labor Statistics, has changed. (Correction to 4.4. BLS measures changes in prices, not Vital statistics.)</p>		
Oregon	<p>Question 6: After learning that a parent who owes support will be incarcerated for more than 180 calendar days, does your state elect to initiate a review of an order without the need for a specific request, i.e., automatically? (See 45 CFR 303.8(b)(2).)</p> <ul style="list-style-type: none"> Recommend different phrasing or word than "i.e. (that is), automatically" because "automatically" is ambiguous and could be understood to be a systematic (non-manual) action, which the intent of the question here is whether the program initiates it, without a request. 	OCSE believes that the intent of the word "automatically" is clear within the question but acknowledges that some states may need guidance when completing this question.	No changes will be made to the question, but the User Guides will provide clarification for users and hover-overs within the IRG will provide additional information.
ERICSA	<p>These questions pertain to the review and adjustment process. Suggest removing Modification as Modification is a broader topic area which includes adding or removing children. Suggest creating a new modification section and including questions as indicated in further comments.</p>	The two topics are so closely intertwined, OCSE feels that separating them would create confusion.	No changes will be made.

SECTION: OTHER STATE-LEVEL ENFORCEMENT			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
Indiana	<p>1. CSB suggests this section be renamed. It suggests these are questions regarding 'other state' enforcement and not the intended other enforcements available in your state that are not mentioned elsewhere in the IRG.</p> <p>2. CSB suggests the addition of the following question regarding Civil Contempt: Does your state have a child support civil contempt statute? If so, give the citation.</p>	Thank you for your recommendations.	Renamed this section from "Other State Enforcement" to "Other State-level Enforcement".
		<p>We agree that renaming the section title would be helpful.</p> <p>States can include civil contempt in Q3 of this section, but OCSE will ask the IRG policy Workgroup to review comment 2.</p>	The IRG policy Workgroup will review the second suggestion
Ohio CSEA Directors' Association	Please consider clarifying question 2.1. In Ohio, we have a data match interface to intercept casino/racino winnings. It may be helpful to ask if the state has a data match and with which entities? (lottery, casino/racing, sports gaming/betting sites)	The specifics surrounding how the process occurs in each state are too detailed for the IRG and is not necessary for the purposes of this information collection	No changes will be made.
ERICSA	Other state Enforcement as a title is confusing. Suggest retitling section as "Additional enforcement Remedies."	Thank you for your recommendation.	Renamed this section from "Other State Enforcement" to "Other State-level Enforcement".
ERICSA	These questions pertain to the review and adjustment process. Suggest removing Modification as Modification is a broader topic area which includes adding or removing children. Suggest creating a new modification section and including questions as indicated in further comments.	The two topics are so closely intertwined that OCSE feels separating them would create confusion.	No changes will be made.
SECTION: PATERNITY PARENTAGE			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
Florida	Current IRG: If the father's name is on the birth certificate and paternity has not been established by any other means, does this mean conclusive determination of paternity?	The question includes the legally accurate language "conclusive determination of paternity."	No changes will be made.

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	<p>•Suggested revision: Does the father's name on the birth certificate constitutes the establishment of paternity? Please provide your state's citation. If no, please describe.</p>		
North Dakota	<p>We suggest adding a question which inquiries about the state's ability or willingness to establish a default order of paternity/parentage. For example, "Will your state establish a default order of paternity/parentage?" We also come across situations where there are multiple alleged fathers in a case, but only one father resides in the responding state. Some responding states will proceed with the establishment if only one father resides in their jurisdiction, while others will require that the father(s) in the other jurisdictions be excluded as a potential father(s) first (especially when the responding state does not have jurisdiction over the out-of-state father(s)). It would be helpful to have information in the IRG on this issue. We suggest adding the following question: "If you are the responding state and there are multiple alleged fathers, but not all alleged fathers reside in your state, will you proceed with the establishment of paternity/parentage? Please explain your establishment process under these circumstances." Following question 9, we suggest adding a question to address the procedure for obtaining the needed paternity/parentage related documents if the IV D agency does not provide them. For example, "If your IV D agency does not provide a paternity acknowledgment, birth certificate, or marriage license/certificate, what are the procedures and associated costs for obtaining these documents?"</p>	<p>OCSE will ask the IRG policy Workgroup to review the first two parts to this comment: 1) new question on paternity default order, 2) new question on multiple fathers in the interstate scenario.</p> <p>The third item - a new question about obtaining paternity docs in other states - should be covered by question 9. However, since multiple comments were received on this issue, the IRG Workgroup will also be asked to consider this suggestion.</p>	<p>The IRG policy Workgroup will review the suggestions.</p>
Indiana	<p>1. Since more states are adopting parentage acknowledgments between same-sex parents and multiple parents, CSB would suggest that the term 'paternity/parentage' be used consistently in this section instead of just using the term 'paternity.'</p> <p>2. CSB suggests the addition of the following question</p>	<p>Use of terminology in these questions is all intentional. Parentage was added where appropriate. Paternity establishment is a statutory term that can't be changed at this time.</p> <p>Refer new questions under 2 and 3 to the</p>	<p>IRG policy Workgroup Consideration for discussion</p>

	<p>regarding same sex/multiple parents: Does your state recognize same-sex parents or multiple parents on parentage acknowledgments and or birth certificates? If so, what are your procedures for adding a same-sex parent or multiple partners to a birth certificate? 3. CSB suggests the addition of the following question regarding genetic testing: How is genetic testing coordinated within your state when parties are in another state?</p>	<p>Workgroup for consideration.</p>	
<p>Ohio CSEA Directors' Association</p>	<p>Please consider asking if the state has a gender-neutral acknowledgment of parentage form. Please consider asking how many parents can be listed on a birth certificate</p>	<p>Thank you for your recommendation. OCSE will ask the IRG policy Workgroup to review the suggestions.</p>	<p>The IRG policy Workgroup will review the suggestions.</p>
<p>ERICSA</p>	<p>Question 3: What is the state law citation that makes paternity acknowledgment conclusive? Please describe (if appropriate). As some states are adopting parentage acknowledgments between same-sex parents and multiple parents, the question should be inclusive of parentage determined by acknowledgment. Suggest using "paternity/parentage." This question causes confusion currently. Suggest revising as follows: Question 5: Does the father's name on the birth certificate constitute a conclusive presumption of paternity? Please provide your state citation. If no, please describe. Suggested revision: •By what method can a father's name can be added to the birth certificate in your state? Please provide your state's citation for each method and when it became effective. •Which of the methods by which a father's name can be placed on the birth certificate results in a conclusive presumption of paternity? Please provide a state citation.</p>	<p>Thank you for your recommendation. OCSE will ask the IRG policy Workgroup to review the suggestions.</p>	<p>The IRG policy Workgroup will review the suggestions.</p>

	<p>Proposed new questions</p> <ul style="list-style-type: none"> •Do you require a paternity/parentage acknowledgment, orders, or other documents validating the paternity/parentage of a child for whom support is being requested? <p>Relocate question (9, 9.1) to section on Copies of Orders and Payment Records and rename section "Obtaining Copies of Documents."</p> <ul style="list-style-type: none"> •Question 9: Does your state's bureau of vital statistics charge any fees to other states or private individuals for requesting searches, paternity/parentage documents, and data? •Question9.1: Describe any circumstances under which these fees may be waived? 		
SECTION: STATUTE OF LIMITATIONS			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
Indiana	<p>CSB suggests splitting proposed question 3 into two separate questions, one for dormancy revival/renewal and a separate question regarding the statute of limitations.</p>	<p>"Can the statute of limitation for enforcement be extended or waived?" was added for the plain language but seems to have caused confusion.</p>	<p>Deleted "Can the statute of limitation for enforcement be extended or waived?"</p>
ERICSA	<p>Question 3: Contain two distinct questions and concepts (dormancy revival and extension of the statute of limitation) and should be separate questions.</p> <p>For both questions, if yes, describe the circumstances. Question 3: Is dormancy revival/renewal possible? Can the statute of limitation for enforcement be extended or waived? If yes, under what circumstances and for how long?</p>	<p>Revision combined – see above suggestion</p>	<p>See above revision.</p>
SECTION: SUPPORT DETAILS			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
Ohio Warren County	<p>The issue in question 6 is common but can span several variations, and it is difficult for caseworkers to navigate these topics between jurisdictions. Consider simplifying the question for clarity, pull the</p>	<p>This question is a revision of the current Question F17.2. The question was still considered valuable, but it needed to be clarified because states weren't interpreting it the same. The current</p>	<p>No changes will be made to the question, but the User Guides will provide clarification for users and hover-overs within the IRG will</p>

	phrase in parentheses to a subsection and replace the word "(in order," and add a few subsections:	format for this question is an open text box response. States can detail their process.	provide additional information.
Florida	Delete this section, move the questions to other sections where the context permits, and add a new section as needed with a more descriptive title for any remaining items.	Support Details was a section on the current IRG. In the most recent revision, this section was included as part of the revisions to allow for information to be included about a state's child support orders that didn't neatly fit into the sections for "establishment" or "modification." OCSE feels that this section is the most appropriate place for these questions.	No changes will be made.
North Dakota	In addition to suggesting that interest questions merit their own section entitled "Interest," we believe questions 2, 3, and 4 would be more helpful if some of the nuances were removed. For example, it seems there is a distinction being made between whether the state's law addresses interest on arrears and whether the IV-D agency's system calculates interest on arrears, which is a worthwhile distinction to make. To make the distinction more conspicuous, we suggest adding lead-in language to question 3, as follows: "If your state has any statute(s) addressing interest on arrears, does your state's IV-D agency calculate the interest? If yes, indicate the amount of interest charged and any related conditions." Also, it seems the questions distinguish between interest in "arrears" and interest in "retroactive support" because there are separate questions pertaining to each. However, it is not readily apparent what is meant by "retroactive support." Is it known variously as "existing arrears," "prior period support," or "lump sum arrears"? More clarity regarding what is intended by "retroactive support," perhaps in the form of examples, would be helpful to distinguish between the two terms.	Thank you for your recommendation. OCSE will ask the IRG policy Workgroup to review the suggestions.	The IRG policy Workgroup Consideration will review the suggestions.
Missouri	As a member of the IRG workgroup, it was my understanding that the abatement questions were to be included in the IRG but just moved from the previous Modification and Review Adjustment section	Thank you for this comment. You are correct; through the revision process we moved the questions on abatement from section K to section F, Support Details. However, it looks like the	Added "Does your state abate support? If yes, explain the circumstances and provide your statutory citation." as question 9 in

<p>(K7, K7.1, and K7.2) to the Support Details section where the questions were a better fit. The abatement questions are not in the proposed IRG, and Missouri staff frequently utilize the IRG to check abatement policies and procedures of other states on a regular basis. We strongly suggest adding the following abatement questions back into the proposed IRG in the Support Details section as intended from the Workgroup but consolidated as:</p> <ul style="list-style-type: none"> •Does your state abate support? For example, when the child is not living with the CP for more than 30 days, and there has not been a change in custody or when the NCP is in prison, etc. •If yes, explain the circumstance and provide your statutory citation. <p>Questions 6 and 6.1 appear to intend to replace the previous F17, F17.1, and F17.2 questions regarding redirection of payments from the court-ordered payee to another payee in TANF, Medicaid, and non-assistance situations. Missouri regularly utilizes these questions to determine whether the issuing state's order follows the child and/or change of payee is permitted to a non-parent caretaker relative or foster care case and if so, what action is necessary for that to occur, e.g., by operation of law, if a court order is necessary, etc. It is unclear whether the wording of these questions in the proposed IRG continues to suffice to meet those needs. The proposed IRG wording leads more in the direction of what documents or type of referral is needed from one state to another. Consideration needs to be given to expanding the question to include situations where a state is enforcing an out-of-state order (one-state case) or a two-state case where the states are enforcing an order issued by a third state.</p> <p>Missouri suggests it would be more helpful for the IRG</p>	<p>question “Does your state abate support?” was left off accidentally.</p> <p>Regarding questions 6 and 6.1, yes, these questions were intended to streamline, clarify, and consolidate the previous questions. These were reviewed by and were agreed upon by the IRG Policy Workgroup.</p> <p>Finally, for question 7, OCSE and the workgroup agree that this addition would be helpful.</p>	<p>the revised IRG.</p> <p>Added "Social Security" to question 7.</p>
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	<p>questions to continue to identify the state's policy and procedures regarding change of payee and could go further to identify what type of referral would be necessary. In Missouri, case assistance status is relevant in regards to order follows/change of payee, so we support verbiage regarding the different assistance types.</p> <p>Missouri suggests the addition of the words "Social Security" within question 7 under Support Details. While Auxiliary Benefits is the terminology used by the Social Security Administration, many states refer to these as Social Security dependent benefits or some variation of that. Adding "Social Security" will assist if a person is using a search feature on the IRG for this particular information as the most common search keyword a person would use is "Social Security." Missouri suggests the following revision to question 7:</p> <ul style="list-style-type: none"> • Does your state IV-D agency give the noncustodial parent credit toward child support for Auxiliary Benefits received directly by the custodial parent on behalf of a child as a result of the noncustodial parent's Social Security Retirement, Survivors, or Disability Insurance (RSDJ) benefit? 		
<p>Ohio CSEA Directors' Association</p>	<ul style="list-style-type: none"> • For question 6, please consider asking if there are limitations in the state that keep a change of payee from happening (e.g., the court requires legal custody and the caretaker only has physical custody). • Please consider adding a question to ask how the state handles a physical custody change between the parents <ul style="list-style-type: none"> • Bring the questions regarding guidelines calculations to this section instead of the Support Establishment section for clarity. (questions 2, 2.1, 3 and 7 from section 1-30) 	<p>Question 6 is a revision of the current QF17.2. The question was still considered valuable, but it needed to be clarified because not all states interpreted it the same. In general, the approach to revising the IRG was to streamline and consolidate questions to allow states to provide appropriate information in one text box rather than in multiple, similar responses. The suggested edit doesn't add further clarity, but OCSE will ask the IRG Policy Workgroup to consider alternative edits to clarify.</p>	<p>The IRG policy Workgroup Consideration will review the suggestions. Additionally, the User Guides will provide clarification for users and hover-overs within the IRG will provide additional information.</p> <p>No changes to question 6.</p> <p>Added "Does your state abate support? If yes, explain the circumstances." as question 9 in the revised IRG</p>
		<p>Support Details was a section on the current IRG.</p>	<p>The IRG policy Workgroup</p>

		<p>In the revision, this section is for questions regarding information about a state's child support orders that didn't neatly fit into the sections for "establishment" or "modification." The IRG Policy Workgroup felt these questions fit better in this section, but OCSE will ask the group to review this suggestion.</p>	<p>Consideration will review the suggestions.</p>
<p>Center for Policy Research</p>	<p>Revise according to edits. Research shows that the practice of assessing interest immediately upon delinquency is the primary factor driving arrears growth. Question 1: What guideline type or method does your state use to calculate child support (for example, Shared Income Model, Percentage of Income Model, Melson Formula)? •Proposed revision: What guidelines type or method does your state use to calculate support (for example, Income Shares Model, Percentage of Obligor Income Model, Melson Formula). (Revise according to edits. The edits reflect the more common language and more precise usage) Question 3: Does your state's IV-D agency calculate interest on arrears? If yes, indicate the amount of interest charged and any related conditions. •Proposed revision: Does your state's IV-D agency calculate interest on arrears? If yes, indicate the amount of interest charged, the frequency with which it is charged (e.g., whether interest is assessed every month upon delinquency or only upon judgment by a court), and any related conditions.</p>	<p>OCSE agrees that "Shared Income Model" is more accurate and common terminology than "Income Shares Model." Thank you for the recommendation on Question 3. OCSE will ask the IRG policy Workgroup to review the proposed revision.</p>	<p>Changed "Shared Income Model" to "Income Shares Model" in Question 1. The IRG policy Workgroup will review the suggestions for Question 3.</p>
<p>ERICSA</p>	<p>The title "Support Details" is not informative. We recommend the section be titled "Additional Program Details."</p>	<p>The questions in this section are about issues related to the support order -- interest and changes to a payee. So "Support Details" seems more accurate than "Additional Program Details." We did, however, receive a number of comments about the organization of the questions in this section, so OCSE will ask the IRG policy</p>	<p>The IRG policy Workgroup will review the suggestions.</p>

		Workgroup to review the organization.	
SECTION: SUPPORT ORDER ESTABLISHMENT			
AFFILIATION AND COMMENTS	OCSE Response and Discussion	Decision	
Ohio-Warren County	<p>Questions 2, 2.1, and 3 seem more appropriate to include in the Support details section because they address guidelines calculations used anytime support is calculated and not limited to the "establishment" process.</p> <p>Question 6 is too complicated, and each case will likely depend on the specific verbiage contained in the orders. Another quirk that could give rise to the question of establishing or modifying is the distinction between no order and a \$0 order—also, an order reserving support and could happen with both parent parties and with non-parent caregivers. I would strike it and add it to a border training as a scenario discussion.</p> <p>Consider moving Question 7 to the Support Order Details because this involves pre-existing orders.</p>	<p>Support Details was a section on the current IRG. In the revision, this section is for questions regarding information about a state's child support orders that didn't neatly fit into the sections for "establishment" or "modification." The IRG Policy Workgroup felt these questions fit better in this section, but OCSE will ask the group to review this suggestion.</p>	<p>IRG policy Workgroup Consideration will review these suggestions.</p>
Florida	<p>Delete the "example scenario" described in Question 6. The scenario goes into too much detail and strays from the questions.</p>	<p>Thank you for this feedback, OCSE agrees.</p>	<p>Example deleted from the question, which now just reads: "When your state has issued an order that reserves support, and now child support should be ordered, does your state require establishment or modification?"</p>
North Dakota	<p>We suggest adding question 6.1, which addresses how the issuing state interprets a zero-dollar order issued in their state. We understand some states treat zero dollars 5 orders as an obligation that would need to be amended. Some states treat zero-dollar orders similarly to how reserved orders are treated, meaning an establishment would be appropriate. We suggest adding question 6.1 as follows: (NEW) "What about</p>	<p>Thank you for your recommendation. OCSE will ask the IRG policy Workgroup to review the proposed new question.</p>	<p>The IRG policy Workgroup will review the suggested new question.</p>

	when your state has issued a zero-dollar child support order, and now a different amount should be ordered, does your state require establishment or modification?"		
Missouri	<p>Question 6 seems lengthy and muddled with the scenario example. The scenario does not really fit with the question and does not seem necessary. We recommend removing the scenario and just leave the question which is self-explanatory.</p> <p>Missouri offers a general comment regarding terminology used throughout the IRG. Today, the use of the terms custodial parent and noncustodial parent often times does not accurately reflect the role of the individual in the case structure and can cast a negative inference. Missouri recommends using the terminology of obliger and obligee whenever possible rather than a custodial or noncustodial parent in the IRG. Missouri incorporates the terminology of "person eligible to receive support (PRS)" and "person responsible for paying support (PPS)" rather than a custodial and noncustodial parent in internal policies and procedures whenever possible.</p>	<p>Thank you for this feedback on Question 6, OCSE agrees.</p> <p>During the IRG Policy Workgroup revision process, it was decided to continue to use the term custodial parent and noncustodial parent. The terms "noncustodial parent" and "custodial parent" have been used throughout the IRG.</p>	<p>Example deleted from the question, which now just reads: "When your state has issued an order that reserves support, and now child support should be ordered, does your state require establishment or modification?"</p> <p>The terms custodial parent and noncustodial parent will continue to be used.</p>
Ohio CSEA Directors' Association	<p>As noted above, please consider moving questions 2, 2.1, 3, and 7 to the support Details" section for clarity.</p> <p>Question 6 may depend on how a court or the agency determines the order—is it a \$0 order, or is there no order at all? This could mean the difference between a modification and an establishment action.</p>	<p>Thank you for your recommendation. OCSE will ask the IRG policy Workgroup to review the suggestions.</p>	<p>IRG policy Workgroup Consideration will review these suggestions.</p>

SECTION: UNIFORM INTERSTATE FAMILY SUPPORT ACT (UIFSA)

AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
Ohio-Warren County	Regarding questions 3 & 4: Even when sending traditional paper documents, workers use the number of copies or two-sided copies to delay services when they could easily make another copy to remedy	Thank you for the comments on questions 3 and 4. These are state procedural issues that do not need to be noted in the IRG.	No changes will be made to questions 3 and 4, but the User Guides will

	<p>the situation. This should only apply if additional or one-sided certified copies are required.</p> <p>The Current questions J25, 26, 27 are useful and could be included here.</p> <ul style="list-style-type: none"> •What is the procedure for obtaining a certified copy of a court order? •What is the procedure for obtaining a certified payment record? •Is there a cost for requesting a certified copy of a court order or payment record. 	<p>Current questions J25, 26, 27 are included in a standalone section of the revised version: "Copies of Orders and Payment Records." This gives them a high profile.</p>	<p>provide clarification for users and hover-overs within the IRG will provide additional information.</p> <p>No questions were moved.</p>
Indiana	<p>CSB suggests the addition of the following question regarding birth certificate documentation:</p> <p>Does your state require copies of birth certificates for any child for whom paternity/parentage and/or support is requested? If so, and the child was born in your state, do you supply the birth certificate?</p>	<p>Thank you for your recommendation. OCSE will ask the IRG Policy Workgroup to review suggested new content. If accepted, this will be placed in the paternity/parentage section.</p>	<p>The IRG policy Workgroup will review the suggested new questions.</p>
GENERAL COMMENTS			
AFFILIATION AND COMMENTS		OCSE Response and Discussion	Decision
North Dakota	<p>General Comments We appreciate that the new categories for the State Profile Questions are organized alphabetically. Still, we question whether the benefit of the new organization offsets the work that will go into getting us in a similar place we are now. The most significant changes involve combining several questions into one or moving questions into a new category. The actual content being solicited in the questions remains largely unchanged (except for some of the new questions being added). It would be helpful if OCSE would identify or clarify which questions are new, which questions have been consolidated, and which questions have been moved. In addition, we hope there will be a mechanism in the Child Support Portal which allows states to copy and paste text from the "old" responses to the "new" responses when the questions are</p>	<p>Thank you for your recommendation. The new questions will be implemented through the OCSE Federal Parent Locator Service (FPLS) Release process. This process will provide states with a list of the approved questions when the new questions are added to the IRG application. States will have a time frame of at least six months to add their responses to the questions. In addition, states can download the current questions and answers to a file that will allow the administrator to cut and paste their recent responses if applicable.</p>	<p>No action required. OCSE will provide additional guidance through the release process.</p>

	updated. This would save states a considerable amount of time when they are tasked with providing responses to the questions.	.	
Indiana	<p>1.CSB would recommend that language utilized in the instrument be standardized. We would recommend that Custodial Party and Non-Custodial Parent be changed to one of the following throughout the IRG to either Obligor/Obligee or Payor/Payee.</p> <p>2.For ease of research and convenience, questions should be able to reside in more than one section as they apply. Functionality should allow for the alteration of question in one place to change the same questions where-ever they appear in the IRG.</p>	The terms "noncustodial parent" and "custodial parent" have been used throughout. The one use of "payee" is used under Support Order Establishment intentionally in the phrase "change of payee." There was one use of the term "obligor" in question 12 under Financial Institution Attachment. We will change that to "noncustodial parent."	Changed obligor to "noncustodial parent" in question 12 under Financial Institution Attachment
Missouri	Overall, we strongly support the new streamlined format of the IRG and the consolidation of questions. The retitling and rearrangement of sections alphabetically within the IRG makes the guide more user-friendly. Splitting the enforcement section into more specialized sections makes the IRG easier to access to find specific information. Missouri notes that it will be a timely endeavor for states to populate responses to this entire new IRG.	Thank you for your support.	No changes will be made.
Vicki Turetsky	These comments are based on a review of the public facing IRG. As a member of the general public, I have spent several months this year using public IRG information to prepare research and policy reports. My specific comments and suggestions related to the existing public IRG questions are listed below by section.	The number of new questions and level of detail suggested by the commenter is more suited for a research and policy audience. The purpose of the IRG, is to assist intergovernmental caseworkers: The IRG "is an essential tool that provides the state, tribal, and international child support enforcement agencies with an effective and efficient method for accessing information to process intergovernmental child support cases."	No changes will be made.

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Oregon	<ul style="list-style-type: none">•The Oregon Child Support Program generally supports and appreciates the updates and changes.•The terms “noncustodial parent” and “custodial parent” are no longer considered best-practice terms, and many programs no longer use them (and some never did). Recommend use of a term not tied to custody and reflects better current practice. Examples: parent who pays support, parent who owes support, parent who receives support, obligated parent, paying parent, receiving parent.	The terms CP/NCP have been vetted through the workgroup and are used consistently throughout the IRG.	No changes will be made.
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Proposed New Questions for IRG Policy Workgroup Consideration

NEW Section: ARREARS MANAGEMENT

Does your state child support agency have a debt compromise program?
If yes, does it operate statewide or in select jurisdictions? If in select jurisdictions, please list them.
If yes, please describe.

Section: CSENet

Does your state use CSENet transactions to communicate with other states? If no, what is your state's preferred method of communication for interstate cases?
When your state is the responding state, does it send a CSENet transaction to acknowledge receipt of an initial intergovernmental referral?

Section: COPIES OF ORDERS AND PAYMENTS

How to obtain copies of birth certificates and paternity acknowledgments?
Description of special requirements for telephonic or video participation in two-state actions.
Indicate whether the state can forward payments without initiating a two-state action
What about when your state has issued a zero-dollar child support order and now a different amount should be ordered, does your state require establishment or modification?"
Whether the state can forward payments without initiating a two-state action

Section: DURATION OF SUPPORT

Does your state law allow the duration of support to be modified?

NEW Section: EMPLOYMENT-ORIENTED PROGRAMS FOR NONCUSTODIAL PARENTS

Does your state operate a child support-related employment program for noncustodial parents?
If yes, does the employment program operate statewide or in select jurisdictions? If in select jurisdictions, please list where it operates
Does your state partner with employment-related service providers and refer noncustodial parents to these programs?
If yes, is this partnership at the statewide and/or in select jurisdictions? If in select jurisdictions, please list where these partnerships exist.

Section: GENERAL PROGRAM AT-A GLANCE

What is the name of your automated system used to track actions on IV-D cases?
What is the name of your SDU? Please note if it is a separate from the IV-D automated system.
What is the name of your State Case Registry?
How would you characterize your state's administrative framework? Is it: (1) state-administered; (2) state-supervised and county-administered; or (3) other? *** If a state responds (3), then a space should be provided to explain how it is administered.
Does your state have a simplified method for divorcing parents to apply for IV-D services, such as answering yes that they want IV-D services on a form that is part of process of getting a divorce?
Are retained collections allocated to the IV-D agency, TANF agency, general funds, or something other?
Besides TANF, are there other programs that require cooperation with the child support agency in your state (e.g., SNAP, and childcare assistance)?

Section: INCOME WITHHOLDING

Is there a state law or court rule that requires all child support cases (IV-D and non-IV-D) to pay through income withholding or the SDU? Please explain.
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NEW Section: INTERGOVERNMENTAL REFERRALS

What other IV-D services or actions besides reviewing and assigning incoming intergovernmental referrals does your state Central Registry provide?
Besides the OCSE Matrix of intergovernmental Forms, does your central registry require any other documentation for referrals (e.g., evidence of paternity/parentage presumptions, foster care orders, proof of court proceedings concerning family violence, temporary restraining orders, etc.)
Will you accept an order with information redacted (e.g., the social security numbers) if information is redacted due to confidentiality concerns?
Can a noncustodial parent who no longer has a past-due account have the report removed from the credit bureau?
For establishment and modification referrals, how recent does the last known wage information need to be to be relevant to your case?
If there is an existing child support order for a child who now is in the custody of the State, what action should be requested in the referral for your state to order the support paid to the State?
If there is an existing child support order for a child who now is in the custody of the State, and there are other children on that order who are still residing with the custodial parent, what kind of action would you take to have support paid to the State for the child in state custody?
If there is an existing child support order for a child who now is in the custody of a non-parent custodial relative, what action should be requested in the referral for your state to order the support paid to the non-parent custodial relative?

Do you require the non-parent custodial relative to have legal custody or will physical custody be enough?
Will you pursue a case to establish paternity when there is an alleged father and a presumed father (or two presumed fathers)? If so, do you want an intergovernmental packet on each father with a note on each Transmittal #1 cross-referencing the packets? Or can they be sent in the same packet?
Will you accept referrals to establish paternity/parentage and/or support if the alleged parent/obligor receives only SSI?
Will you accept a referral to enforce against unemployment benefits for an NCP that does not live in your state?
What types of verification of the party's address are acceptable? How recent must the verification be?
Is there a centralized office to contact for reconciling arrearage balances? If so, what is that contact information. If not, who should one contact? (call center, case worker, etc.)
Are there scenarios where your state will not accept a request for enforcement of arrears only?

Section: LICENSE Enforcement

When your state is the responding state for enforcement, will you allow the initiating state to maintain an active license suspension process while the interstate referral is open?
When your state is the responding state for enforcement, will you allow the initiating state to initiate a license suspension process while the interstate referral is open?

NEW Section: LICENSE SUPENSION

Are caseworkers required to conduct a review to assess ability to pay before notification of a suspension and/or before actual suspension?
If a parent is notified of revocation/suspension, is there an opportunity to negotiate a payment schedule without paying the entire sum and without going to court? Please explain.
What are your state's criteria for professional license revocation/suspension for nonpayment of support? Specify the professional license types.
What are your state's criteria for recreational license revocation/suspension for nonpayment of support? Specify the recreational license types.

Section: MODIFICATION AND REVIEW/ADJUSTMENT

How frequently does your state allow order reviews in IV-D non-PA cases when there is not a change in circumstance?
Does your procedure require a request from a party to review an order in an IV-D Non-PA case? If so, must the request be signed by the party?
Can the IV-D agency initiate a review in an IV-D non-PA case without a request from the party (e.g., based on data from automated sources that the parent is receiving unemployment or SSI)?
At what point in the process must a party submit documentation of a change of circumstance (i.e., at the point of requesting a review or when the actual review is being conducted)?
Is there a different quantitative criterion set in agency rule for IV-D orders? If so, what is it?

Do your modification criteria require a sustained or continued change in circumstance? If so, how is it defined?
Does your child support agency have an automated match with your state's Department of Corrections to identify incarcerated noncustodial parents? Do you use it to facilitate order modification?
How does your state child support agency track "every support order established or modified in the state" pursuant to 45 §303.108 (2)(ii)?
When your state is the issuing state, are there any aspects of a child support order that may not be modified under your state's law (See UIFSA § 611)? If yes, please describe.

Section: PATERNITY/PARENTAGE

Does your state recognize same sex parents or multiple parents on parentage acknowledgments and or birth certificates? If so, what are your procedures for adding a same sex parent or multiple partners to a birth certificate?
How is genetic testing coordinated within your state when parties are in another state?
Will your state establish a default order of paternity/parentage?
If you are the responding state and there are multiple alleged fathers but not all alleged fathers reside in your state, will you proceed with establishment of paternity/parentage?
Please explain your establishment process under these circumstances."
If your IV D agency does not provide a paternity acknowledgment, birth certificate, or marriage license/certificate, what are the procedures and associated costs for obtaining these documents?

NEW Section: SOCIAL SECURITY

If a parent receives both Title II and SSI benefits, do you use the Title II benefits as income on your guidelines when establishing or modifying a child support order?
If a child's family benefit paid directly to the CP is greater than the child support order, how do you credit the excess amount of current support? (i.e., is it treated as a gift, paid to arrears accrued at any time, treated as payment for a future period)
If a child's family benefit paid directly to the CP is less than the child support, do you send an IWO to SSA to supplement the benefit to reach the current order?
If a child's family SSD benefit paid directly to the CP is less than the child support, does the above situation qualify as a change of circumstance for a review and adjustment?
Does your state require a motion to modify to credit family benefits paid directly to the cp on behalf of the child against the current child support order?
How does your agency monitor the amount of family benefit received on the case?
How do you credit a Title II lump sum benefit paid to the SDU for a case? (i.e., the monthly amount is credited to current child support that month, the entire amount is credited towards all arrears, etc.)

If lump sums are paid to both the NCP and the family, how do you credit the money received by the family and by the SDU to a case?
If the case is an intergovernmental case, what is your process for communication or reconciliation of the SSA payments with the other state?
Does your state close cases when the NCP receives SSI only or when NCP receives SSI and Title II benefits?

Section: SUPPORT DETAILS

Does your guideline calculate support using the adjusted gross income of the parent(s) or the adjusted net (after-tax) income of the parents or something other? Please explain.
Describe how your state considers the subsistence needs of the parent with a duty to pay support? If it's a self-support reserve, please specify the amount. Also, please note whether the subsistence needs of the parent receiving support is considered and how.
Describe how your state considers the subsistence needs of the parent with a duty to pay support? If it's a self-support reserve, please specify the amount. Also, please note whether the subsistence needs of the parent receiving support is considered and how.
What is the highest income considered in your child support formula/schedule/table?
Does your guideline formula factor in the amount of time the child spends with each parent? If so, what evidence do you use of that time (e.g., court-order custody schedule, parenting plan, or verbal testimony).
Does your guideline provide a minimum order? If so, how much? Under what circumstances is the minimum order applied? If there is an income threshold for applying, how much?
Can your guideline formula/schedule result in a zero order? If yes, under what circumstances?
Does your state establish zero orders in other circumstances that are not discussed in your state's guidelines? If yes, under what circumstances are these zero orders established?
Does your guideline address circumstance where there are more than two parents who have a financial responsibility for the children? If so, how?
Are your guidelines set in state statute, court rule, administrative rule, or a combination? If a combination, please describe.
Who is responsible for the periodic review of your guidelines (e.g., a commission set in statute, the child support agency)? If reviewed by a commission or committee, who appoints members?

Section: SUPPORT ORDER ESTABLISHMENT

How does your state child support agency define a default order? Can a default order can be established without a hearing if a parent does not respond to the summons/complaint?
What about when your state has issued a zero-dollar child support order and now a different amount should be ordered, does your state require establishment or modification?"

Section: SUPPORT ORDER ESTABLISHMENT

Does your state require copies of birth certificates for any child for whom paternity or a child support order is requested? If yes, and the child was born in your state, do you supply the birth certificate?

Do you require a paternity acknowledgment, and adjudication of paternity or other records that paternity has been established for a child for whom a support order is requested? If yes, describe.

Does your state require copies of birth certificates for any child for whom paternity/parentage and/or support is requested? If so and the child was born in your state, do you supply the birth certificate?