Intergovernmental Reference Guide (IRG)

OMB Information Collection Request

0970 – 0209

Supporting Statement Part A - Justification

**December 2024**

Type of Request: Revision

Submitted By:

Office of Child Support Services

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 Services (OCSS) maintains the Intergovernmental Reference Guide (IRG), a centralized and automated repository of state and tribal profiles with high-level descriptions of each state and tribal child support (CS) program and its procedures. These profiles provide state, tribal, and foreign country CS agencies (CSAs) with an effective and efficient method to update and access information needed to process intergovernmental child support cases. Respondents may complete the state and tribal profile questions but are not required to do so. If a respondent does choose to respond to any questions, they will typically do so only one time. Occasionally, a respondent may amend their initial answers.

The IRG information collection activities are authorized by:

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

This request is for an approval of a three-year extension and revisions to a currently

approved information collection.

 The reference to the Office of Child Support Enforcement (OCSE) in the tribal profile was

Updated to reflect the name change to Office of Child Support Services (OCSS). This change does not impact the burden for the tribal profile.

1. **Purpose and Use of the Information Collection**

The information in the IRG profiles is a centralized, automated repository of information provided by OCSS on its website to support intergovernmental case efforts to helps states and tribal CSAs process intergovernmental child support cases more effectively and efficiently.

1. **Use of Improved Information Technology and Burden Reduction**

The IRG information is accessible through the Child Support Portal, a centralized location, which allows state and tribal CSAs to access and update information as changes occur. The IRG improves the accuracy of CSA information, facilitates expedited case processing, and reduces costs.

1. **Efforts to Identify Duplication and Use of Similar Information**

The IRG is unique; there are no other similar sources of information.

1. **Impact on Small Businesses or Other Small Entities**

There is no impact on small businesses or other small entities.

1. **Consequences of Collecting the Information Less Frequently**

IRG information is vital to ensure that the most comprehensive and current information is available to process intergovernmental child support cases efficiently and effectively. CSAs enter new data one time and, thereafter, update information as changes occur. Not collecting IRG information will increase CSAs' time and costs to obtain the needed information and will negatively impact or delay intergovernmental 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), OCSS published a notice in the Federal Register at 89 FR 56883 on July 11, 2024. The notice announced OCSS’ 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. As a result, OCSS reviewed and responded to 23 comments received during the 60-day comment period. After a review of the comments, OCSS deleted questions, revised and clarified questions, and added a new question to the proposed IRG state profile. These revisions did not result in a burden change. See Attachment A for comments and OCSS responses.

Additionally, as part of the most recent revision in 2022, OCSS received numerous public comments on state profiles during comment periods. No comments were received for tribal profiles in 2022. During that year, OCSS postponed reviewing these state profile comments until this renewal process. OCSS has now considered the 2022 state profile comments through workgroup discussions, policy evaluations, and program reviews. Based on the 2022 comments, OCSS proposes revisions to the state profile questions for clarity and has added new questions to help states, tribes, foreign countries, and other stakeholders manage health care coverage, wage withholdings, and other financial processes. These changes resulted in a minor burden change from .03 to .05

**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 confidential case data or personally identifying information; however, it does contain contact information for state and tribal employees. Access to any state and tribal employees’ contact information in the IRG is restricted to authorized users only.

**11. Justification for Sensitive Questions**

The IRG does not contain sensitive case data.

**12. Estimates of Annualized Burden Hours and Costs**

***Estimated Burden Hours***

During the public comment period, respondents did not provide specific feedback indicating that the burden hours estimate required adjustment. However, OCSS determined a minor increase in the burden hours to accommodate respondent input to new or revised questions. The current estimate is deemed appropriate and accurately reflects the time needed to collect information.

 ***Estimated Cost to Respondents***

OCSS calculated the hourly burden cost to respondents using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants 21-1021 and wage data from May 2023 which is $28.46 per hour. To account for fringe benefits and overhead, OCSS multiplied the hourly rate by two, or $56.92. 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>).

*ANNUAL BURDEN ESTIMATES*

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Information Collection Instrument | Annual Number of Respondents | 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 | 0.5 | 486 | $56.92 | $27,633 |
| Intergovernmental Reference Guide: Tribal Profile Guidance | 62 | 18 | 0.3 | 335 | $56.92 | $19,068 |
| **Estimated Annual Burden and Cost Total** | **821** | **-** | **$46,731** |

**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 $919,789. This includes federal salaries and benefits of $121,687 and contractor and hardware/software costs of $798,102. 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**

Revisions to the proposed state profile clarify existing questions, add program processing questions, and change OCSE to OCSS. Program processing questions address health care coverage, wage-withholdings, and other financial processes.

After a review of comments received during the 60-day comment period, OCSS deleted and revised language to clarify existing questions and added a new question to the IRG state profile.

The tribal profile contains a name change from OCSE to OCSS.

**16. Plans for Tabulation and Publication and Project Time Schedule**

 There are no plans for tabulation and publication.

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

Not applicable.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions.