

**45 CFR 303.7 -- Provision of Services in  
Intergovernmental IV-D; Federally Approved  
Forms (OMB #0970-0085)**

**OMB Information Collection Request  
0970 - 0085**

**Supporting Statement Part A -  
Justification**

**September 2022**

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 intergovernmental forms are critically important for the effective and efficient processing of child support cases under UIFSA 2008. Since enactment of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, section 466(f) of the Social Security Act (Act) has required U.S. states, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands, as a condition of receiving federal funds, to enact certain amendments to the Uniform Interstate Family Support Act (UIFSA). Section 311(b) of UIFSA requires that a petition and accompanying documents conform substantially with the standard intergovernmental forms mandated by federal law, and 45 CFR 303.7(a)(4) requires state child support agencies to use federally approved forms in intergovernmental cases, unless a country has provided alternative forms in an Office of Child Support Enforcement (OCSE) country-specific caseworker's guide. All policy references are documented in *Attachment 1*.

## **2. Purpose and Use of the Information Collection**

The federally approved intergovernmental forms are used to facilitate interstate child support case processing when more than one state child support agency is involved. More than one state agency may become involved in a child support case when the parents live in different states, where the parties no longer reside in the state that issued the support order, or when assets are sought in states other than the state enforcing the support order. Intergovernmental cases are the most complex and difficult cases. About 15-25 percent of child support cases are believed to involve more than one state. These forms are used among state agencies for case processing; neither the forms or information on the forms is sent to or collected by federal OCSE.

The intergovernmental forms are readily recognizable and provide the information states agree is needed to process a case. These forms are used by all entities involved in intergovernmental child support cases, including but not limited to state child support agencies, courts/tribunals, attorneys, and parties.

## **3. Use of Improved Information Technology and Burden Reduction**

Beginning in FY 1997, 45 CFR 307.10(b)(14)(vi) required state child support agencies to integrate all processing of interstate cases with the computerized support enforcement system in the state. Beginning in FY 2000, 45 CFR 307.11(f)(4) required state child support agencies' state systems to exchange information with agencies of other states and interstate information networks. The majority of the federally approved intergovernmental forms have been automated by CSENet (a federal system), allowing forms information to be transmitted electronically between states. Documents can also be transmitted electronically through OCSE's Electronic Document Exchange (EDE). State child support systems are programmed to generate their own completed forms, as well as receive forms from other states.

#### **4. Efforts to Identify Duplication and Use of Similar Information**

There is no similar information available through any known source or mechanism. The forms enable states to share specific case information known only to their state with child support programs in other states. This information sharing is critical so that states can take the appropriate action in a child support case. The federal government was originally charged with developing federally approved intergovernmental forms because of the critical nature of intergovernmental case processing and the need for efficiency.

#### **5. Impact on Small Businesses or Other Small Entities**

This collection of information will have no impact on small businesses or other small entities because both the point of origin and the destination of the forms are state child support agencies and judicial courts.

#### **6. Consequences of Collecting the Information Less Frequently**

If the federally approved intergovernmental forms were not used, the federal child support program would be seriously impaired in meeting its mission of ensuring that children have paternity established and receive the support to which they are entitled. Because approximately 15-25 percent of child support cases involve interstate casework, the parentage and support establishment for a significant number of children would be delayed or even placed in jeopardy, as delay can result in loss of contact with the parties. Without the forms, state child support agencies would lose the efficiencies associated with use of the forms and spend more resources to do less work.

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

State agencies using these forms must adhere to regulatory timeframes for intergovernmental case processing as required under 45 CFR 303.7. Some of the case processing timeframes include sending information on the forms in fewer than 30 days, in order to provide effective child support services to families. As noted earlier, neither these forms nor the information on the forms is submitted directly to OCSE.

#### **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), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on March 28, 2022, Volume 87, Number 59, page 17297, and provided a 60-day period for public

comment. During the comment period, five comments were received, which are attached along with responses from OCSE.

## **9. Explanation of Any Payment or Gift to Respondents**

No payments or gifts are involved in this information collection.

## **10. Assurance of Confidentiality Provided to Respondents**

Information the states collect using the federally approved intergovernmental forms is subject to the confidentiality requirements at §454(26) of the Social Security Act and the states' own confidentiality requirements protecting personal information in their possession.

Two forms allow for the removal of the personal information from each of the other standard intergovernmental forms. The first form is the Child Support Agency Confidential Information Form, which is used only between agencies. The second form is the Personal Information Form for UIFSA §311, which safeguards the privacy of individuals by recording required UIFSA personal information on a separate document rather than on all of the other forms needed to process a case. This form can be filed with the tribunal but should not be filed in a public access file.

## **11. Justification for Sensitive Questions**

Because of the purposes of the intergovernmental forms, it is necessary to include personal information regarding the parents of the child. Most of this information has been removed from all but two of the forms - the Personal Information Form for UIFSA §311 and the Child Support Agency Confidential Information Form - so that it can be easily protected. The justification for these questions is that the information is necessary for filing child support actions in the responding state. This saves the petitioner from traveling to another state to file the actions personally.

In public assistance cases, the mother is informed that her cooperation with the state child support agency's efforts to establish parentage and secure child support is an eligibility requirement for the receipt of public assistance. In non-assistance cases, the parent is advised that the state child support program cannot establish parentage without this information. In non-assistance cases, the petitioner decides whether he or she wishes to proceed.

It is necessary to obtain Social Security numbers as part of this information collection. This is required by the Social Security Act: §453, Federal Parent Locator Service; §453A, State Directory of New Hires; §454, State Plan for Child and Spousal Support; §454A, Automated Data Processing; and by cross-reference to these sections in §454B, Collection and Disbursement

of Support Payments. In addition, §466(a)(13) of the Act requires each state to have a law in effect requiring the recording of Social Security numbers in the records pertaining to certain family matters, including recording the number of any individual who is subject to a divorce decree, support order, or paternity determination or acknowledgment. Section 466(c)(2) of the Act requires each state to have a law and procedures in effect for child support purposes under which each party in a child support case is required, subject to privacy safeguards, to file with the child support agency and update, as appropriate, information on location and identity of the party, including the Social Security number. The Child Support Agency Confidential Information Form is not filed with the court and protects the identity of the party.

## 12. Estimates of Annualized Burden Hours and Costs

The burden hours for each form are estimated based on data from the [OCSE FY 2020 Preliminary Annual Report](#). Based on this date, we used the total number of intergovernmental cases for the 54 states and US territories (respondents), which is 866,600 total cases (see Table P-34: Interstate Cases Sent to Another State for Five Consecutive Fiscal Years). To estimate the number of responses per respondent, OCSE divided the 866,600 cases by 54 which is 16,048. OCSE then multiplied 16,048 by the percent of cases that require each form. The estimated average time per response is estimated based on experience to date.

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Transmittal #1 – Initial Request	54	16,048	0.17	147,321	\$38.90	\$5,730,787
Transmittal #1 – Initial Request Acknowledgement	54	16,048	.05	43,330	\$38.90	\$1,685,537
Transmittal #2 – Subsequent Action	54	12,036	.08	51,996	\$38.90	\$2,022,644
Transmittal #3 - Request for Assistance/Discovery	54	2,407	.08	10,398	\$38.90	\$404,482
Uniform Support Petition	54	6,419	.05	17,331	\$38.90	\$674,176
General Testimony	54	6,419	.33	114,387	\$38.90	\$4,449,654
Declaration in Support of Establishing Parentage	54	2,407	.15	19,497	\$38.90	\$758,433
Child Support Locate Request	54	160	.05	432	\$38.90	\$16,805
Notice of Determination of Controlling Order	54	2	.25	27	\$38.90	\$1,050

Letter of Transmittal Requesting Registration	54	9,629	.08	41,597	\$38.90	\$1,618,123
Personal Information Form for UIFSA § 311	54	6,419	.05	17,331	\$38.90	\$674,176
Child Support Agency Confidential Information Form	54	19,258	.05	51,997	\$38.90	\$2,022,683
Request for Change of Support Payment Location Pursuant to UIFSA 319(b)	54	80	.05	216	\$38.90	\$8,402
<b>Estimated Annual Burden Total:</b>				<b>515,860</b>	<b>Estimated Annual Cost Total:</b>	<b>\$20,066,954</b>

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2021, which is \$19.45 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$38.90. The estimate of annualized cost to respondents for hour burden is \$38.90 times 515,860 hours or \$20,066,954.

[https://www.bls.gov/oes/current/oes\\_stru.htm](https://www.bls.gov/oes/current/oes_stru.htm)

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

States will need to make minor changes within their systems to update the expiration date on the forms. In the estimate of costs in the table below, there is a one-time total cost to states of \$224,618 averaging \$4,160 per state. Under the Title IV-D program, states pay 33.33% of the costs for running their child support program, and the Federal Government covers 66.67% of the costs.

Instrument	Change	Number of Forms	Number of Respondents	Hours	Total Hours	Cost per Hour	Total Cost	Total State Cost	Total Federal Cost
Inter-governmental forms	One-time statewide systems modifications	13	54	8	5,616	\$120	\$673,920	\$224,618	\$449,302

### 14. Annualized Cost to the Federal Government

There is a one-time cost to the Federal Government for the one-time statewide systems modifications of \$449,302, as indicated under item 13.

**15. Explanation for Program Changes or Adjustments**

The estimate of annual burden hours has declined from 722,663 hours in the last approval to 515,860 hours in this request. Changes in burden are due to the decline in the overall child support caseload over the last several years and also changes in estimate in response times based on reading time estimates per HHS guidance. States use these forms to process cases between jurisdictions; these intergovernmental cases are a percentage of each state's overall caseload. Therefore, as the total number of cases declines, so does the number of intergovernmental cases. For information on the child support caseload, see [OCSE Preliminary Annual Report FY 2020, Table 34.](#)

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

There is no planned analysis or publication of the data collected by state agencies.

**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 to the certification statement.