DELAWARE HEALTH AND SOCIAL SERVICES
Division of Child Support Services

Office of the Director

84A Christiana Road, New Castle, DE 19720 Phone 302-395-6520

September 14, 2026

Office of Child Support Enforcement (OCSE)
Attention: Director of Policy and Training
330 C Street SW.,
Washington, DC 20201

RE: Open Comment Period – Required Data Elements for Paternity Establishment Affidavits - On July 24, 2026, OCSE published a 60-day notice in Federal Register Volume 91, Number 141, page 46787. OCSE is seeking a three-year extension of the Voluntary Acknowledgement of Paternity and Required Data Elements for Paternity Establishment Affidavits. No changes are proposed to the data elements, but burden has been adjusted to reflect improved automation for processes.

To Whom It May Concern:

Delaware supports the Office of Child Support Enforcement's (OCSE) proposed three-year extension of the Voluntary Acknowledgment of Paternity (VAP) and Required Data Elements for Paternity Establishment Affidavits. Delaware agrees that the collection remains necessary and has practical utility in supporting the timely, consistent, and legally recognized establishment of parentage. Maintaining standardized federal data elements promotes consistency among states and facilitates the recognition and acceptance of voluntary acknowledgments completed in other jurisdictions.

Delaware also supports OCSE's updated burden estimates and the recognition of efficiencies resulting from increased automation and electronic service delivery. Electronic processes have reduced administrative workload and improved the efficiency of the parentage establishment process for parents, hospitals, birth record agencies, and state child support programs. Delaware encourages OCSE to continue supporting modernization and automated and electronic VAP processes, where permitted by state law, while minimizing administrative burden and maintaining the notices and safeguards necessary to ensure parents understand the legal consequences, rights, alternatives, and responsibilities associated with acknowledging parentage.

Additionally, *Delaware recommends that OCSE consider updating the terminology used in this information collection from "paternity" to "parentage."* States across the country are reviewing and updating parentage laws and terminology, including through adoption or consideration of the Uniform Parentage Act (UPA) and related approaches that recognize parentage in a more inclusive and gender-neutral manner. Updating federal terminology would better align with these developments and reflect the broader legal framework governing the establishment of legal parentage.

Overall, Delaware supports the proposed extension and believes the continued collection of this information is important to effective child support program administration and the timely establishment of legal parentage.

Sincerely,
Theodore G. Mermigos, Jr.
Theodore G. Mermigos, Jr.
IV-D Director, Delaware