



EASTERN REGIONAL INTERSTATE CHILD SUPPORT ASSOCIATION

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Comments by the Eastern Regional Interstate Child Support Association On the Proposed Changes to the Federal Standard Intergovernmental Forms OMB control number 0970-0085

I. Introduction

The Eastern Regional Interstate Child Support Association (ERICSA) is a not-for-profit organization of child support professionals from government agencies, the private sector, the bench, and the bar. Its mission is to build a stronger intergovernmental child support community by developing and advocating effective policy, facilitating communication, and delivering innovative professional training to enhance the well-being of families.

Founded in 1963, ERICSA historically has drawn its membership from tribes and states that border on, or are east of, the Mississippi River. ERICSA holds an annual training conference and provides policy positions on key issues affecting child support.

The Federal Office of Child Support (OCSE) proposes changes to the Federal Standard Intergovernmental Forms posted to the Federal Register, on page 57439, Volume 84, Number 207. ERICSA provides comments herein to the forms.

II. ERICSA'S Comments on the Federal Standard Intergovernmental Forms

On all "Instructions":

ERICSA Comment:

1. The statement "If you are not the intended recipient, you are hereby notified that any use, disclosure, distribution, or copying of this form or its contents is strictly prohibited." has been added to some of the forms. The wording should be stronger. For example, would Privacy Act of 1974 considerations apply here?
2. When referencing 'EDE' for the first time on a form, more detail be included so that it refers to the Electronic Document Exchange application available on OCSE's Child Support Portal.
3. When referencing CSENet the first time on a form, it should be defined as the Child Support Enforcement Network.

Child Support Agency Confidential Information Form

ERICSA Comment:

1. We recommend that the form have a very prominent “CONFIDENTIAL” watermark across the page with a specific check box to indicate “Family Violence”. Or alternatively, specific directions in the instructions to direct states with open dockets to keep this form/information sealed from public view.

Child Support Enforcement Transmittal #1 – Initial Request

ERICSA Comment:

1. Under Section II, a box for court-ordered arrears payment amount be added. Along with frequency. Some states are currently writing it in next to ‘Support amount/frequency’.

Child Support Enforcement Transmittal #1 – Initial Request Acknowledgment

ERICSA Comment:

1. There be a check box to indicate that the initiating state has a participant that wishes to participate in any tribunal action via telecommunication. For the Instructions: If this box is checked then the responding state should contact the initiating state to coordinate participation.

Child Support Enforcement Transmittal #2 – Subsequent Actions

ERICSA Comment:

1. Would propose a new #19:
 19. [] Registration and/or administrative enforcement of a previously registered order in an open intergovernmental case. Please advise what pleading or documents are needed.

This would require a subsequent addition to the instructions:

Check **item 19** “Registration and/or administrative enforcement of a previously registered order in an open intergovernmental case” if you are requesting that a jurisdiction enforce a modified version of a previously registered order. In response, the jurisdiction should return the requested information about any needed pleading or documents.



Child Support Enforcement Transmittal #3 – Request for Assistance/Discovery

ERICSA Comment:

No comment

Child Support Locate Request

ERICSA Comment:

No Comment

Declaration in Support of Establishing Parentage

ERICSA Comment:

No comment

General Testimony

ERICSA Comment:

1. Page 1, Under IV-D case, add another check box, 'unknown'. The experience of many state workers is that clients do not know/remember if they were on cash assistance in another state.
2. Under Section I, Item A – Currently states 'Obligee parent information'.... could 'Parent/Caretaker' be an option with a checkbox stating which?
3. Again, under Section V for health care coverage. Perhaps a box for 'N/A' for non-parent obligee.

General Testimony Instructions

ERICSA Comment:

No Comment

Letter of Transmittal Requesting Registration

ERICSA Comment:

1. Under Section I, a line inserted for court-ordered arrears payment amount. Some states are writing it in 'Other'.



Notice of Determination of Controlling Order

ERICSA Comment:

No Comment

Personal Information Form for UIFSA § 311

ERICSA Comment:

1. Under Section 2, Parent/Caretaker with a checkbox stating which. This could remove the entire Caretaker box beneath.

Request for Change of Support Payment Location Pursuant to UIFSA § 319

ERICSA Comment:

No Comment

Uniform Support Petition

ERICSA Comment:

No Comment

