

DATE: August 25, 2023

TO: Office of Child Support Services- OMB control number 0970-0171

FROM: The Arizona Division of Child Support Services (DCSS)

SUBJECT: Open Comment Period — Voluntary Paternity Acknowledgment and Required Data Elements for Paternity Establishment Affidavits

Upon review of the Proposed Information Collection Activity; Voluntary Acknowledgment of Paternity and Required Data Elements for Paternity Establishment Affidavits with no proposed changes, the Arizona Division of Child Support Services (DCSS) would like to submit the following comments:

Comments- General

- 1. Request that Daytime Phone number and Hospital of Birth for the child be moved to mandatory fields, not optional.
- 2. Would like to see the daytime phone number and Hospital of Birth (child) as a required field.

Comments on whether the proposed collection of information is necessary for the proper performance of the functions of the OCSS, including whether the information shall have practical utility

- 1. Yes.
- 2. The proposed collections of information assists the state of AZs HPP team with making sure that Birth's are properly recorded and that birth certificates are as complete as possible. This in turn assists DCSS by having the best information available if one of the parents files for child support.



Comments on the accuracy of the OCSS estimate of the burden of the proposed collection of information.

1. In the state of AZ we have shown that by having a dedicated team work with the Bureau of Vital Records to have the Acknowledgement of Paternity completed and by obtaining accurate information at birth has lead to ease of the Child Support Application Process. Where one hand is spending time collecting the information the other hand is spending less time when a child support case needs to be opened because there is no need to wait on paternity testing. We are able to open cases quicker with less back and forth.

Comments on the quality, utility, and clarity of the information to be collected.

- 1. In AZ we work with the Bureau of Vital Records to train hospital birth recorders and midwives on what needs to be collected at the time of birth and how to fill out the Acknowledgement of Paternity. We have a dedicated team phone number and email address that is provided to the hospitals and birthing facilities so that if there are questions they can be answered quickly.
- 2. The info needs to be clear and complete to process the affidavit.

Comments on ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

- 1. The suggestion is fine, but the information they want to automate needs to be necessary and complete to finalize the form.
- 2. I don't see this as a burden. We have a solid process in AZ that creates ease for Child Support case managers when they open new cases. This allows them to open more cases in less time.