

Iowa Department of Human Services

Terry E. Branstad
Governor

Kim Reynolds
Lt. Governor

Charles M. Palmer
Director

September 6, 2011

Office of Management and Budget
Paperwork Reduction Project

Attn: Desk Officer for the Administration for Children and Families

RE: Comments in response to OCSE-157 Child Support Enforcement Annual Data Report – Request for written comments in the notice of proposed information collection, OMB Number: 0970-0177, Federal Register Vol. 76, No. 153, Tuesday, August 9, 2011, page 48865.

Dear Desk Officer for the Administration for Children and Families:

This letter is in response to your request for comments in the notice of proposed information collection for the OCSE-157 Child Support Enforcement Annual Data Report.

Please find enclosed comments from the Iowa Department of Human Services, Bureau of Collections.

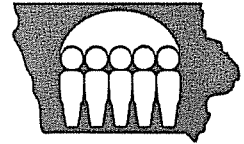
Thank you for the opportunity to comment.

Sincerely,

Carol Eaton, Chief
Bureau of Collections

Enclosure

Comments on the revision of the
OCSE-157 Child Support
Enforcement Annual Data Report



Iowa's IV-D child support program strongly suggests postponing the changes to the OCSE-157 Child Support Enforcement Program Annual Data Report due to the following reasons:

1. States were given the *option* in AT-10-10, issued by OCSE on November 7, 2010, "...to define medical support to include private health insurance as well as other health care coverage such as Medicaid, CHIP, and other state coverage plans, and cash medical support..." However, the proposed revisions to the medical lines on the OCSE-157 Child Support Enforcement Annual Data Report do not provide an option. Instead, they completely change the definition of "medical support" to include health care coverage such as Medicaid, CHIP, and other state coverage plans. States who chose to adopt the option to include Medicaid, CHIP, and other state coverage plans will find the proposed revisions to the OCSE-157 Child Support Enforcement Annual Data Report consistent with the option they chose. However, for states such as Iowa who chose another option provided in AT-10-10 to "continue current and planned medical support policies and practices," this reporting change is inconsistent with current policy.

Since options mentioned above were provided in AT-10-10, this reporting change on the OCSE-157 Child Support Enforcement Annual Data Report should also be optional. This would allow states to report consistent with their chosen option in AT-10-10. This data is not currently being audited and should not be used in performance comparisons amongst states as like comparisons cannot be made until consistent policy direction is issued.

2. OCSE has indicated further medical support guidance will be issued to the states in the fall of 2011.
3. OCSE plans to issue new proposed medical support regulations in 2012.

Asking states to change their report mechanisms and programming now is premature as future medical support regulations will likely lead to additional changes. Again, we respectfully request postponing the changes to the OCSE-157 Child Support Enforcement Annual Data Report.