

Doug Burgum, Governor  
Christopher Jones, Executive Director

July 29, 2019

Office of Child Support Enforcement  
Administration for Children and Families  
Department of Health and Human Services  
ATTN: Ann M. McGill, ocse.dpt@acf.hhs.gov

RE: Open Comment Period – Standard Intergovernmental Forms

Dear Ms. McGill:

Below are comments by the Child Support Division of the North Dakota Department of Human Services on the Comment Request as published in the Federal Register on June 18, 2019 (84 FR 28304) and issued through OCSE-DCL-19-04, OMB control number 0970-0085.

**Child Support Agency Confidential Information Form and Child Support Agency Confidential Information Form Instructions**

We do not oppose the proposed changes to the instructions, as outlined in the Attachment to DCL-19-04, Summary of Proposed Changes to the OCSE Intergovernmental Forms (Summary of Proposed Changes). We did, however, note two technical errors in the instructions: 1) page 3, Section II: the text in the italicized text box does not identify a field in Section II of the form, appears to repeat a portion of text in an italicized text box in Section I of the instructions, and abruptly ends mid-sentence; and 2) page 3, Section III: there is a period missing after the sentence which states, "If "Other," describe how the parent-child relationship was established".

**Child Support Enforcement Transmittal #1 – Initial Request Acknowledgement and Child Support Enforcement Transmittal #1 – Acknowledgment Instructions**

We do not oppose the proposed changes to the form or instructions, as outlined in the Summary of Proposed Changes. To be consistent with the proposed changes which remove language requiring the form to be returned to the initiating jurisdiction to clarify that electronic acknowledgment is permissible, we ask that consideration be given to additionally removing the language on page 1 in the footer of the form which states "Return This to the Initiating Jurisdiction" and the language on page 2 of the instructions

following "ACKNOWLEDGMENT:" which states "Return this form to the initiating jurisdiction".

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

We oppose that portion of item 3 set forth in the Summary of Proposed Changes for this form, which removes the requirement that the "Payment Locator Code" be provided by the requesting agency. We ask that the form retain the requirement under Section I, item 11(b), that the requesting agency provide the Payment Locator Code, in addition to the SDU Name, SDU Address, and Remittance ID. Retaining this requirement serves a dual purpose: first, it provides an extra level of clarity for the assisting agency when determining where to send payments; and second, it eases system operation and promotes efficiency by providing the assisting agency the information necessary to search for the payment location by code (which is how the automated system is driven in North Dakota), as opposed to limiting the readily available information to SDU name and address.

### **Instructions for Declaration in Support of Establishing Parentage**

We noted that the footer on page 1 of the instructions was missing, which typically identifies the title of the document and the page number.

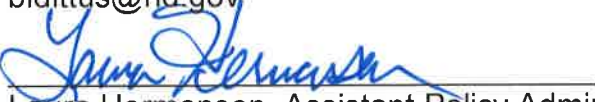
### **Instructions for the Notice of Determination of Controlling Order**

We noted that the page numbers of the instructions were incorrect on all three pages.

Thank you for considering North Dakota's comments to the proposed standard intergovernmental forms. Please feel free to contact us if you have questions or would like further explanation or information about these comments.



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