

**From:** [OCSE DPT \(ACF\)](#)  
**To:** [Ward, Debbie \(ACF\)](#)  
**Subject:** FW: Comments in response to OMB control number 0970-0085  
**Date:** Monday, August 12, 2019 1:05:32 PM

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**From:** Chappelow, Sarah <Sarah.Chappelow@dhhs.nh.gov>  
**Sent:** Monday, August 12, 2019 12:57 PM  
**To:** OCSE DPT (ACF) <OCSE.DPT@acf.hhs.gov>  
**Subject:** Comments in response to OMB control number 0970-0085

Thank you for the opportunity to provide comment on the proposed changes related to the Intergovernmental forms, OMB control number 0970-0085. New Hampshire's Department of Health and Human Services, Bureau of Child Support Services (BCSS) presents the following comments regarding three of the forms.

**"Declaration in Support of Establishing Parentage":** NH is in support of the proposed change to include a signature line for the IV-D agency representative. This signature line is needed in circumstances when the petitioner is non-cooperative and BCSS can gather, or has already received, information to file as part of the application. The signature line is also needed for a IV-E case with NH's child welfare agency, and in cases with motherless draws.

**"Letter of Transmittal Requesting Registration":** NH appreciates the personal information safeguards that the Office of Child Support Enforcement (OCSE) introduced with its consolidation of personal information into the "Child Support Agency Confidential Information Form" and "Personal Information Form for UIFSA § 311" with the 2016 form revisions. NH is concerned, however, that the "Letter of Transmittal Requesting Registration" continues to require the NCP's sensitive information, namely the SSN field. NH recommends that either

- the SSN field be removed, since IV-D agencies will already have provided that information on the "Child Support Agency Confidential Information Form", which is required to accompany the form, or
- the instructions be revised to indicate that completion of the NCP SSN field is optional when the form is submitted by the IV-D agency along with the "Child Support Agency Confidential Information Form".

**"Personal Information Form for UIFSA § 311":** NH recommends that the "Personal Information Form for UIFSA § 311" form instructions clarify whether the applicant or IV-D agency should complete the form. NH also suggests that the form include a signature line for the party or IV-D agency representative completing it, since the form's fields are pulled from the "General Testimony", and the "General Testimony" includes a signature line.

Thank you again for this opportunity to provide comment.

Sincerely,

**Sarah Chappelow**

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NH Bureau of Child Support Services  
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