



EASTERN REGIONAL INTERSTATE CHILD SUPPORT ASSOCIATION

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**Comments by the Eastern Regional Interstate Child Support Association
On the Notice of Proposed Rule Making
Paternity Establishment Percentage Performance Relief
Federal Register, Vol. 86, No. 199, pp. 57770 -73
RIN 0970-AC86**

November 19, 2021

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.

The federal Office of Child Support Enforcement (OCSE) proposes a regulatory change specifically geared to the COVID-19 world-wide pandemic and one of its effects on the child support enforcement program. The Notice of Proposed Rulemaking (NPRM) is intended to prevent any negative action being taken against states for a failure to meet the Paternity Establishment Percentage (PEP) performance measure due to circumstances beyond the control of the programs.

II. Support for the Proposed Rule

ERICSA supports this proposed rule and encourages extending the relief to at least FFY 2022. We encourage OCSE to ensure the relief supports states that report their PEP data on a calendar year basis. This proposed rule recognizes that the reduction of a states' TANF block grant during a time of pandemic because the public health crisis blocked the actions which would normally be taken to meet the PEP measurement

would be inappropriate and counterproductive. Until the public health situation stabilizes, there is little the state programs can do to bring their PEP measurement into compliance with the statutory mandate. ERICSA would like to take this opportunity to encourage OCSE to consider other updates to the rule to provide future flexibility to the Secretary to be responsive to future similar events.

III. Conclusion

The Board of Directors of ERICSA and its Officers appreciate the opportunity to respond to, and comment upon, the Notice of Proposed Rule Making.

Sincerely,



Tommy Howard
ERICSA President