

July 20, 2026

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RE: Docket number ACF–2026–0529, RIN number 0970–AD39

The National Child Support Engagement Association (NCSEA) appreciates the opportunity to provide comments on Notice of Proposed Rulemaking (NPRM) ACF–2026–0529/RIN 0970-AD39, *Reducing Bureaucracy and Burden for Child Support Enforcement Programs.*
NCSEA is an association of individuals and organizations with a passion for child support. Our members include public, non-profit, and private sector professionals who work to promote and strengthen child support policies and services, and to educate, connect, and inspire those who work in child support.

NCSEA supports succinct regulations that do not duplicate the requirements of federal law. We agree with many of the 29 proposed rescissions of sections of the Code of Federal Regulations.

NCSEA prefers the prior notice and public comment components of the regulatory process over sub-regulatory guidance that can be issued without advance notice or opportunity for the regulated community to ask questions or pose concerns.
While the proposed rescissions are suggested as technical corrections, the potential impact to the families we serve could be quite substantive and deserves a more in-depth analysis. NCSEA suggests that some of these regulations provide helpful clarity and beneficial guidance, the rescission of which would neither reduce bureaucracy nor lighten a burden on child support agencies. In addition, the rescission of an existing regulation should be approached with caution. NCSEA strongly believes the sections listed below are in fact not

duplicative of federal law and should be retained. Even if OCSE disagrees with NCSEA regarding those five sections, prudence strongly favors retention of existing regulatory guidance to avoid all risk of unintended consequences.

Of the sections proposed for rescission, NCSEA suggests further review and retention of five sections.

45 CFR § 302.32. This section provides for timeframes for distribution of child support in certain situations. 42 USC § 654b(c)(1) establishes a two-day timeframe but is expressly limited to payments received "from the employer or other source of periodic income." (Emphasis added). 45 CFR § 302.32 adds timeframes for several other situations and for collections from non-periodic sources of income. These timeframes are not otherwise provided in federal law. If the section is rescinded, the clarity afforded by the regulation will be lost. NCSEA does not support the rescission of this section.

45 CFR § 302.33. This section currently provides specific authority for child support agencies to offer medical support-only services to Medicaid recipients and paternity-only services in intrastate cases. The establishment of parentage has life-long benefits for a child even if the parents are not interested in establishing or enforcing a child support obligation. The rescission would raise the question of whether those customer-friendly service options can continue. NCSEA does not support the rescission of this section.

45 CFR § 302.38. NCSEA firmly believes child support collections should benefit the child and the child's family rather than private collection agencies (PCAs). The 2016 changes to this section were part of a multi-pronged approach to make it more difficult for PCAs to divert child support payments and recoup exorbitant fees for collections that were often the sole result of efforts of government child support agencies rather than the PCA. The addition of the word "directly" in the regulation in 2016 was important in this effort.

The proposed rescission of 45 CFR § 302.38 would create doubt whether OCSE intends a change in its position that payments should not be diverted to PCAs. This would be a substantive negative change to families. If a parent wants to retain the services of a PCA for a fee, collection of the fee is a matter exclusively between the parent and the PCA and child support agencies should not be compelled to divert payments to or recoup fees on behalf of the PCA. NCSEA does not support the rescission of this section.

45 CFR § 303.32. NCSEA agrees that subsections (a), (b), and (d) of the regulation related to the National Medical Support Notice are unnecessary in light of 42 USC § 666(a)(19). However, the helpful clarity of (c)(5), (c)(7), and (c)(8) related to the processes for contesting a withholding based on mistake of fact, notifying an employer when a current order for medical support is no longer in effect and the selection of a plan option when there is more than one option available are not found in the text of federal law. NCSEA does not support the rescission of this section.

45 CFR § 304.20. The non-exclusive listing of examples of reimbursable program activities in this section provides reliability and certainty for child support agencies that cannot be replaced with sub-regulatory guidance that can be changed with no prior notice or opportunity to comment.

NCSEA does not support the rescission of this section.

Thank you for the opportunity to comment on the proposed changes.

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