

**Supporting Statement For
OMB Clearance**

FPLS Child Support Services Portal Registration

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SUPPORTING STATEMENT:

PART A – JUSTIFICATION

Part A of the Supporting Statement for this information collection, Federal Parent Locator Service (FPLS) Child Support Services Portal (FCSSP), addresses the 18 points identified in 5 CFR 1320.

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The information collection addressed in this Supporting Statement is necessary to enable the Office of Child Support Enforcement (OCSE) to verify the identity of an authorized individual registering to use the Federal Parent Locator Service's Child Support Services Portal (FCSSP). The registration and verification process ensures that only authenticated users have access to online web applications maintained in the Federal Parent Locator Service (FPLS), as provided in the statutory requirement to establish and implement safeguards to restrict access to confidential information maintained in the FPLS to authorized persons for authorized purposes, pursuant to Paragraph 453(m)(2) of the Social Security Act. 42 U.S.C. § 653(m)(2).

The registration process is fully compliant with the requirements of the E-Government Act of 2002 and follows the guidance of OMB 03-22, *Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002*. OCSE will create accounts for the authorized user, which will simplify access to the FPLS and provide greater opportunity to view FPLS data, thus allowing an increase in the collection of child support by state agencies operating child support programs.

2. Purpose and Use of the Information Collection

2.1 How the information is to be used

After completing the registration process OCSE will authenticate the information provided by a user and then create an account for that user to access the FPLS. The authorized user can then log into the FCSSP using the FPLS Security Framework to access FPLS programs, for which the user is authorized.

2.2 By whom the information is to be used

The information collected will be used by federal OCSE administrative staff.

2.3 For what purpose the information is to be used

Information collected via the registration process will be used to perform user verification, tracking and general support. The registration process collects user and company information to create new accounts, and makes that information available to the OCSE administrative staff for authentication. Data entered in the registration screens will be sent to existing federal databases by OCSE administrative staff to verify name and Social Security number combinations. The OCSE administrative staff will then call the employer to verify employment of those individuals registering for an account.

After registration information is verified, an FPLS access account is created, which then requires activation by the authorized user. The activation process involves retrieving information linked to account authorizations; generating a security token and sending an email notification to the new user with instructions to log in and activate his/her account or, if rejected, the email will contain a notification of denial.

The login process accepts user credentials (username and password) and the answer to a challenge question, and then validates credentials against a data store, which is a table of authorized users. If the credentials are valid, access to the FCSSP is allowed. If the credentials are not valid, an “access denied” alert is displayed and access is not permitted. The FCSSP uses security software that monitors unsuccessful log-in attempts and will lock an account; it can also monitor lack of use for 90 days and request deactivation.

3. Use of Improved Information Technology and Burden Reduction

The information collected at the time of FCSSP registration is captured via a secure Internet site and the operation of the FPLS Security Framework (FSF), which provides the authorization and authentication services for the FCSSP. Users access the FCSSP website via the Internet and will need to present a login ID, password, and the answer to a challenge question to be authenticated. The authentication system includes geo-location capability to identify where the user request originates. These schemes represent federal multi-factor authentication requirements.

4. Efforts to Identify Duplication and Use of Similar Information

There is no other source in which users can register for the FCSSP.

5. Impact on Small Businesses or Other Small Entities

No discernible impact is associated with the collection of this information.

6. Consequences of Collecting the Information Less Frequently

OCSE only collects information during the one-time registration process; therefore, information not provided at registration will prevent OCSE from authorizing users. This will prohibit the user from accessing the online applications needed to support the child support mission.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

Not applicable.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

A notice was published in the Federal Register at 77 FR 31019 on May 24, 2012, which allowed for a 60-day comment period for the public to submit in writing any comments about this information collection. Georgia Division of Child Support Services submitted a comment in support of the FCSSP on June 4, 2012.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

FPLS Security Framework provides secure access through the registration process. The following are in place to ensure the security of the user's information:

- Passwords on the OCSE Network are stored as 128-bit hash map.
- SSN, DOB and Responses to challenge questions are stored encrypted using the NIST-standard Advanced Encryption Standard (AES).
- The FCSSP application uses SSL encryption. FCSSP has its login server in the firewall's Demilitarized Zone (DMZ). Communications with the login server from outside must use SSL encryption.
- A User ID and password, along with answering a challenge question, are required to access the FCSSP protected applications and data. Session authenticity is ensured by integral HTTPS and SSL encrypted session management functionality. Multiple logins for the same user ID are not permitted.
- The OCSE Network employs custom-developed monitoring tools, such as Cisco IDS integrated in the routers and firewall, and techniques such as port scanning to monitor events and detect attacks on the information system. System log files provide another tool to detect unauthorized activity.
- System alerts are monitored daily for applicable advisories for the OCSE Network. Updates and security patch notifications are received and reviewed by network personnel to determine if they are applicable to the OCSE Network and to recommend appropriate actions, if any, to be taken in response to the alert or advisory.

11. Justification for Sensitive Questions

The SSN is collected during the initial registration process in order to verify the user's employment information through the NDNH. Additional information collected includes the name, date of birth and employer information of the registrant, which is also necessary to ensure proper verification of users before creating an access account.

12. Estimates of Annualized Burden Hours and Costs

Table 12.1

| Instrument | Number of Respondents | Number of Responses per Respondent | Average Burden Hours Per Response | Total Burden Hours |
|----------------------|------------------------------|---|--|---------------------------|
| Registration Screens | 588 | 1 | 0.1 | 58.8 |

Estimated Total Annual Burden Hours¹: 59

The annual burden for collecting registration information from employers, financial institutions, insurers, local access and visitation providers and State agencies is 59 hours, based on 165 employer users, 66 financial institution users, 17 insurers, 300 local access and visitation providers and one staff member for each of up to 40 State agencies, registering one time only. Annual burden hours were estimated through OCSE conducting a “test registration” and it was determined that the average time to enter the registration information is approximately 0.1 hours (6 minutes) per registration.

The total annualized cost to the users for the collection of registration information is \$1,035, or an average cost of \$1.76 for each response. The cost was calculated using average hourly wage rate of \$17.62 for employers, financial institutions, insurers, state agencies and local access and visitation providers².

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

Respondents and Record Keepers do not incur operation and/or maintenance costs associated with the FCSSP. The registration screens were developed and will be maintained by OCSE.

14. Annualized Cost to the Federal Government

The online registration process is part of the FCSSP system, and it is a small part of the overall operational activities and cost of the FCSSP. The estimated annualized cost to the federal government for the entire FCSSP is \$1,035,918, which includes federal salaries and benefits of \$169,300 and contractor and hardware/software costs of \$866,619.

Increases in the annual cost to the federal government from the previous PRA submission are for costs to develop and maintain new online applications that were added to expand the

¹ Burden hours rounded from 58.8 to 59

² Based on Bureau of Labor Statistics July 2011 National Compensation Survey

capabilities and services of the FCSSP.

15. Explanation for Program Changes or Adjustments

There are no program changes.

The adjustment in the respondent burden hour from the previously approved PRA represents an increase in program applications and additional authorized users being added to the FCSSP in support of the OCSE mission.

The total annualized cost was adjusted to reflect an increase from the previously approved PRA because the number of FPLS applications has increased, there are more authorized users and the hourly wage estimates were increased to reflect current wage rate estimates from the Bureau of Labor Statistics.

16. Plans for Tabulation and Publication and Project Time Schedule

There are no plans for analysis or publication of this information.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

OCSE will display the expiration date of the OMB approval on the information collection instruments.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions.

SUPPORTING STATEMENT:

PART B - STATISTICAL METHODS (used for collection of information employing statistical methods)

The information collection requirements outlined in this report do not employ the use of statistical methods.