

**Supporting Statement For
OMB Clearance**

Child Support Document Exchange System (CSDES)

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A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

State IV-D child support agencies sought the assistance of the federal Office of Child Support Enforcement (OCSE) in developing a method to securely and efficiently exchange child and spousal support documents electronically. In response, OCSE developed and is implementing a new application, the Child Support Document Exchange System (CSDDES), within the Federal Parent Locator Service (FPLS) Child Support Services Portal (CSSP).

As provided by 42 U.S.C. § 666(c)(1)(A)(B)(C) and (D) and 42 U.S.C. § 653(a)(1), the CSDDES will collect and maintain certain child and spousal support case-related records provided by a state IV-D child support agency to facilitate the dissemination of IV-D child and spousal support information to authorized users acting on behalf of a state IV-D child support agency. CSDDES will also provide technical assistance to the states to help them establish effective systems for collecting child and spousal support and aid states in fulfilling the federal requirement to transmit requests for child support case information and provide requested information electronically to the greatest extent possible. 42 U.S.C. § 652(a)(7) and 45 CFR § 303.7(a)(5).

2. Purpose and Use of the Information Collection

2.1 How the information is to be used

The purpose of the information collection via the CSDDES is to provide state IV-D child support agencies with a more effective means to exchange documents that pertain to child and spousal support cases, including those to establish parentage, modify or enforce a child support order, and establish or modify medical support notices when parties to the case reside or are employed in different states.

State IV-D agencies will submit requests for case-related documents to the CSDDES, which are then routed to the applicable state for response. The responding state then uploads the appropriate documents to the CSDDES for the requesting state to download for case processing.

The CSDDES will also contain transaction logs to track requests and receipt of documents pertaining to child and spousal support cases.

2.2 By whom the information is to be used

Authorized users acting on behalf of a state IV-D child support agency will use the information collected and disseminated. Information may also be use by appropriate federal, state, local, tribal or foreign agencies responsible for identifying, investigating, prosecuting enforcing or implementing a statue, rule regulation or order if the information

is relevant to a violation or potential violation of civil or criminal law or regulation within the jurisdiction of a state IV-D child support agency receiving the information.

OCSE will not use the information contained in the documents that are exchanged but will use the tracking logs, which will be maintained and stored at a separate location from the CSDES.

2.3 For what purpose the information is to be used

Information collected via the CSDES will be exchanged between state IV-D child support agencies to reduce delays, costs, and barriers associated with intra and multistate case processing; increase paternity and order establishment; increase state child and spousal support debt collections; improve document security; standardize data sharing; and increase state participation; and, improve overall child and spousal support outcomes.

If necessary, OCSE may make use of document exchange tracking log information for audits.

3. Use of Improved Information Technology and Burden Reduction

The CSDES technology will improve the time and cost burden on state IV-D child support agencies to resolve child support cases because it will eliminate delays associated with exchanging hard copies. OCSE servers will electronically route documents on behalf of requesting and responding state IV-D agencies, which will reduce operational costs associated with postage, faxing, copying and handling, while improving document security that is not guaranteed using the hard copy exchange method.

State IV-D child support agencies that already access the SSP will not incur programming requirements or need to purchase equipment; therefore, state agencies will not incur any cost to access the CSDES.

If states opt to exchange documents using the batch process, programming will be necessary and a designated file server to which OCSE will collect and deliver files will be required. Programming for the request and response files must follow the OCSE specifications provided in the CSDES record layouts.

As part of the FPLS portal infrastructure, which is an established secure environment for handling documents, CSDES will encourage participation in child and spousal support document exchanges because it will be accessible to users already authorized to access the State Services Portal (SSP).

4. Efforts to Identify Duplication and Use of Similar Information

The CSDES is a unique system. There is no other system available to all state IV-D child support agencies with the capability to serve as a central source for securely and efficiently exchanging documents to facilitate and improve multi-state case processing.

5. Impact on Small Businesses or Other Small Entities

There is no impact on small business or other small entities.

6. Consequences of Collecting the Information Less Frequently

Collecting the information less frequently will negatively impact individuals, and the children of those individuals, who are receiving benefits and services by a state IV-D child support agency; it will hinder a state's ability to reduce costs, diminish security of case-related documents and information, and will impede a state's ability to efficiently resolve or address child and spousal support cases.

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

Quarterly collections are not sufficient to maintain expeditious sharing of child and spousal support case-related information among state IV-D child support agencies. On-going document and information exchanges are necessary to ensure state IV-D child support agencies have the most current information available and the greatest opportunity to resolve or address child and spousal support cases.

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

A notice of this proposed information collection was published in the *Federal Register* at 77 FR 50699 on August 22, 2012, which allowed for a 60-day comment period for the public to submit in writing any comments about this information collection. No comments were received.

9. Explanation of Any Payment or Gift to Respondents

Respondents did not receive payment or gifts.

10. Assurance of Confidentiality Provided to Respondents

Specific administrative, technical, and physical controls are in place to ensure that the records collected and maintained in the CSDES are processed and stored in a secure environment and are protected from unauthorized access. Logical access controls are also in place for authorized users, which limits access to information and prevents browsing.

Additionally, requests and responses are stored for 30 days and then deleted; records provided to the CSDS by a state IV-D child support agency are maintained for a maximum of 60 days from receipt of a response, after which it is deleted. Tracking logs are retained for one year and then deleted.

11. Justification for Sensitive Questions

Documents and information exchanged may contain sensitive information about individuals involved in state IV-D child and spousal support cases; therefore, to ensure protection of private information, records maintained in the CSDS are retrieved by Social Security numbers. When a Social Security number is unavailable, pertinent records may be retrieved using name, date of birth, the child support case identifier, or a combination of thereof. The use of alternatively sensitive information is to properly identify the case-related documents that will be exchanged with state IV-D child support agencies, thus ensuring that documents and information match an individual or an individual's case.

12. Estimates of Annualized Burden Hours and Costs

12.1 Respondents' Hour Burden

OCSE estimates that 54 child support enforcement (CSE) agencies will participate in the CSDS within the next three years. States will be able to exchange documents electronically via SSP, a batch process, or a combination of both.

The Washington CSE agency provided information about their current volume of documents exchanged. They reported 58,918 interstate cases in 2011 and exchanged 6,742 documents. The nationwide interstate caseload in 2011 was 2,015,918. Assuming there will be a similar exchange rate by all CSE agencies, approximately 230,682 documents will be exchanged, with an average of 4,272 exchanges occurring annually for each CSE agency.

The average burden hour per response was estimated by OCSE completing the required data entry screens and determining that the average time to complete it is approximately .016667 hours (60 seconds).

Based on feedback from state agencies, OCSE estimates two state CSE agencies will elect to use an automated transmission method via batch processing. The average burden hours estimate was calculated with information provided by state CSEs' for the one-time computer programming that is required for the method that allows for automated transmission of files.

Table 12.1

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours Per Response	Total Burden Hours
On-line Data Entry Screens	52	4,272	.0166667 (60 seconds)	3,702.41
Batch Processing	2	1	40	80.00

Total Burden Hours: 3,782.41

12.2 Respondents' Cost for Hour Burden

The annualized costs to respondents for the hour burdens are based on an average wage rate of \$19.56 per hour for employers reporting data to the states. ¹Cost per response will be \$0.326 (\$19.56/60 seconds), which translates into an average annualized cost per respondent of \$72,419.14 (\$19.56 x 3,702.41). Since there are an estimated 52 CSE agencies using CSDES, the average annualized cost per respondent is \$1,392.68 (\$72,419.14 / 52).

There are no ongoing annual costs for batch processing. CSE agencies opting to exchange documents using batch transmission method will incur one-time start-up costs, detailed in item 13.

Table 12.2

Reporting Requirement	Average Annualized Cost Per Respondent	Total Annualized Cost
On-line Data Entry Screens	\$1,392.68	\$72,419.14
Batch Processing	0	0

Total \$72,419.14

¹ Based on Bureau of Labor Statistics July 2011 National Compensation Survey Hourly wages.

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 CSDES if they elect to use the on-line option.

States that choose to implement batch processing require a one-time start-up cost to program for the request and response files. A sample of states² estimated it would require 40 hours or less of programming time. Thus, the total estimated start-up cost for two states and tribes to effect the proposed changes is \$6,400³, or \$3,200 per agency. There are no ongoing operation and/or maintenance costs.

14. Annualized Cost to the Federal Government

The CSDES application costs OCSE \$437,708 to develop and implement. The CSDES application is a small part of overall operational activities and cost of the FPLS Child Support Services Portal. The estimated annualized cost to the federal government for the entire CSSP is \$1,035,918, which includes federal salaries and benefits of \$169,300 and contractor and hardware/software costs of \$866,619.

15. Explanation for Program Changes or Adjustments

This is a new project; however, the name was changed from “Electronic Data Exchange” to “Child Support Document Exchange System” (CSDES) after the initial design and the web-based applications were developed. All references to “Electronic Data Exchange (EDE)” are being changed to “Child Support Document Exchange System”. Updating all references is a time consuming process; therefore, reference to the initial project name may still be on the web pages and other early documentation. The screen shots provided as part of the information collection request refer to the Electronic Data Exchange rather than CSDES, but will be updated as soon as possible.

This program change does not impact the respondents; it is noted to provide explanation for the dual references to the program. The information collection and the application will function as CSDES.

16. Plans for Tabulation and Publication and Project Time Schedule

There are no plans for tabulation and publication.

² States sampled were Maryland, Virginia, Massachusetts, Missouri, and Washington.

³ Estimated for 2 states at 40 hours time required to make programming changes at \$80 per hour labor cost. One state estimated the cost of programming labor at \$80 per hour; several states agreed with this estimate.

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification statement.

SUPPORTING STATEMENT

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

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