

**Supporting Statement For
OMB Clearance**

Child Support Document Exchange System (CSDES)

March 2016

Prepared by
U.S. Department of Health and Human Services
Administration for Children and Families
Office of Child Support Enforcement
Mary E. Switzer Building
330 C Street, SW 5th Floor
Washington, DC 20201

TABLE OF CONTENTS

Section	Page
A. JUSTIFICATION.....	3
1. Circumstances Making the Collection of Information Necessary	3
2. Purpose and Use of the Information Collection.....	3
3. Use of Improved Information Technology and Burden Reduction.....	4
4. Efforts to Identify Duplication and Use of Similar Information.....	4
5. Impact on Small Businesses or Other Small Entities.....	4
6. Consequences of Collecting the Information Less Frequently.....	4
7. Special Circumstances Relating to Guidelines of 5 CFR 1320.5.....	4
8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency	5
9. Explanation of Any Payment or Gift to Respondents.....	5
10. Assurance of Confidentiality Provided to Respondents.....	5
11. Justification for Sensitive Questions.....	5
12. Estimates of Annualized Burden Hours and Costs.....	5
13. Estimate of Other Total Annual Cost Burden to Respondents and Record Keepers.....	7
14. Annualized Cost to the Federal Government.....	7
15. Explanation for Program Changes or Adjustments.....	7
16. Plans for Tabulation and Publication and Project Time Schedule	7
17. Reason(s) Display of OMB Expiration Date is Inappropriate.....	8
18. Exceptions to Certification for Paperwork Reduction Act Submissions.....	8
B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS.....	9

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The federal Office of Child Support Enforcement (OCSE) offers the Child Support Document Exchange System (CSDDES) application within the OCSE Child Support Portal. The CSDDES is a centralized and secure application that collects, maintains, and disseminates certain child and spousal support case information provided by a state child support agency. Authorized users in state child support agencies (hereinafter, “state child support agencies”) access the CSDDES application to electronically exchange child and spousal support case information with other state child support agencies.

Using the CSDDES application benefits state child support agencies by reducing delays, costs, and barriers associated with interstate case processing, increasing state collections, improving document security, standardizing data sharing, increasing state participation, and improving case processing.

The activities associated with the CSDDES application are supported by 1) 42 U.S.C. 652(a) (7), which requires OCSE to provide technical assistance to the states to help them establish effective systems for collecting child and spousal support; 2) 42 U.S.C. 666(c)(1), which requires state child support agencies to have expedited procedures to obtain and promptly share information with other state child support agencies; and, 3) 45 CFR 303.7(a)(5), which requires states to transmit requests for child support case information and provide requested information electronically to the greatest extent possible.

2. Purpose and Use of the Information Collection

The CSDDES application allows state child support agencies to effectively exchange documents pertaining to child and spousal support cases. State child support agencies submit requests for case information to the CSDDES, which are then routed to another state for response. The responding state then uploads the appropriate documents to the CSDDES for the requesting state to download for case processing.

State child support agencies that use the CSDDES application will reduce delays, costs, and barriers associated with intrastate and multistate case processing; increase paternity and order establishment; increase state child and spousal support debt collections; improve document security; standardize data sharing; increase state participation; and improve overall child and spousal support outcomes.

State child support agencies will use the information collected, maintained, and disseminated via the CSDDES application. The information may also be used by appropriate federal, state, local, tribal, or foreign agencies responsible for identifying, investigating, prosecuting, enforcing, or implementing a statute, rule, regulation, or an 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 child support agency receiving the case information and documents.

OCSE maintains and tracks use of the CSDES application, but does not see or use the content of the case information and documents that are exchanged.

3. Use of Improved Information Technology and Burden Reduction

The CSDES application reduces time and cost burden on state child support agencies to resolve child support cases because it eliminates delays associated with exchanging hard copies. The CSDES application electronically routes case information and documents on behalf of requesting and responding state child support agencies, which reduces operational costs associated with postage, faxing, copying, and handling, while improving document security that is not guaranteed when exchanging hard copies.

The Child Support Portal, where the CSDES application is housed, is an established secure environment for handling documents that encourages participation in child and spousal support document exchanges. State child support agencies already access the child support services portal within the Federal Parent Locator Service; therefore, there are no additional programming requirements or costs required to purchase equipment to access the CSDES.

4. Efforts to Identify Duplication and Use of Similar Information

The CSDES is a unique application. There is no other application available to all state child support agencies with the capability to serve as a central source for securely and efficiently exchanging child and spousal support case information and documents.

5. Impact on Small Businesses or Other Small Entities

Not applicable.

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 child and spousal support services provided by state child support agencies. Additionally, it will hinder a state child support agency's ability to reduce costs, diminish security of case information and documents, 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 child support agencies. Ongoing case information and document exchanges are necessary to ensure state 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 80 FR 51955 on October 1, 2015, 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

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

Security controls are in place to ensure that the case information and documents collected and maintained in the CSDES application are processed and stored in a secure environment, and are protected from unauthorized access. Logical access controls are also in place for state child support agencies, which limits access to information and prevents browsing.

Requests and responses are stored for 30 days and then deleted; responses indicating that the documents are pending an upload, and all unsolicited documents, are maintained for a maximum of 60 days, after which they are deleted.

11. Justification for Sensitive Questions

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

Seventeen child support agencies currently use the CSDES application. OCSE estimates that the remaining 37 child support agencies will participate in the CSDES within the next three years.

The state child support agencies that are currently using the CSDES application exchanged a total of 8,637 documents, with each agency exchanging an average of approximately 508 documents. Based on these findings, and assuming there will be a similar exchange rate by all 54 state child support agencies, OCSE predicts that approximately 27,435 documents will be exchanged annually.

To estimate burden hours per response, OCSE staff completed the required CSDES application data entry screens that state child support agencies populate. On average, it took approximately .016667 hours (60 seconds) to complete the screens. The total burden hour estimate is calculated and rounded to be 457 hours (27,435 documents x .016667 hours).

Table 12.1

Information Collection Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
Online Data Entry Screens	54	508	.0166667 (60 seconds)	457

Total time burden for respondents is 457 hours.

12.2 Respondents' Cost for Hour Burden

The annualized costs to state child support agencies for the burden hour are based on an average wage rate of \$21.85 per hour for state child support agency staff.¹ Cost per response will be \$0.364 (\$21.85/60 seconds), which translates into a total annualized cost of \$9,985.45 (\$21.85 x 457). Since there are an estimated 54 child support agencies that will use the CSDES, the average annualized cost per respondent is approximately \$184.92 (\$9,985.45/54).

Table 12.2

Information Collection Instrument	Average Annualized Cost per Respondent²	Total Annualized Cost³
Online Data Entry Screens	\$185	\$9,985

¹ Based on Bureau of Labor Statistics May 2014 National Industry-Specific Occupational Employment and Wage Estimates

² Rounded from \$184.92

³ Rounded from \$9,985.45

Total cost for the respondents' burden hour is \$9,985.

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

There are no other costs to respondents and record keepers.

14. Annualized Cost to the Federal Government

The CSDES application cost OCSE \$437,708 to develop and implement in 2013. In FY2015, OCSE spent \$90,299 to enhance the CSDES application. The CSDES application is a small part of overall operational activities and cost of the OCSE Child Support Portal. The estimated annualized cost to the federal government for the entire Child Support Portal is \$3,347,757, which includes federal salaries and benefits, contractor costs, data center, and hardware/software costs.

15. Explanation for Program Changes or Adjustments

State child support agencies refer to the CSDES application as the "Electronic Data Exchange" or "EDE," which was the original name of the application. OCSE changed the application name to CSDES prior to the previous approval. The collection tools (screen shots) provided as part of this information collection approval request refer to the "Electronic Data Exchange" or "EDE," but the information collection and the application officially functions as "CSDES." The naming convention has no impact on the burden hour or cost to state child support agencies.

At the request of state child support agencies, OCSE made minor application enhancements to improve request and response content options; expand case information and documentation content and format; and search options. These enhancements provide states more flexibility in supporting their current business workflows and organizational structures. While the enhancements constitute a program change, they do not require state child support agencies to make any system changes; therefore, the enhancements do not impact the burden hour or costs.

Additionally, OCSE removed "Batch Processing" as a document exchange option, which constitutes a program change. State child support agencies opting to use the Batch Processing would first need to allocate time and resources to program; therefore, removing the Batch Processing option reduced the burden hours.

Current usage and the number of documents exchanged are less than previously estimated. As a result, the overall burden hour and cost for state child support agencies are also less than the previous approval.

16. Plans for Tabulation and Publication and Project Time Schedule

There are no plans for tabulation and publication.

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.