

**Supporting Statement for OMB Clearance**

**Office of Child Support Enforcement  
Division of Federal Systems  
Child Support Portal Registration**

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## **A. JUSTIFICATION**

### **1. Circumstances Making the Collection of Information Necessary**

The federal Office of Child Support Enforcement (OCSE), Division of Federal Systems, maintains the Child Support Portal, hereinafter “Portal,” through which authorized users may view, update, or upload information for child support purposes. To securely access the Portal as an authorized user, OCSE creates profiles within the Portal for employers, insurers, and multistate financial institutions (MSFIs) using information provided in the Employer Service (ES) Profile Form and the Debt Inquiry (DI) Insurer Profile Form (see OMB No: 0970-0196 for the MSFI Profile Form). State child support agencies manage and authenticate authorization for individual users via the state proxy server; therefore, a profile form is not required.

The federal Child Support Portal Registration information collection activities are authorized by 1) 42 U.S.C. § 653(m)(2), which requires the Secretary to establish and implement safeguards to restrict access to confidential information in the Federal Parent Locator Service to authorized persons, and to restrict use of such information to authorized purposes; 2) E-Government Act of 2002 and Office of Management and Budget (OMB) Circular 03-22, *Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002*, which requires agencies to ensure program integrity by verifying access to data; and 3) 44 U.S.C. §3554, which requires OCSE to implement security protections to prevent unauthorized access to information maintained by OCSE.

### **2. Purpose and Use of the Information Collection**

In addition to creating profiles and authenticating authorized users, information collected via the Portal registration process is used by OCSE administrative staff to create authorized user accounts, track login activity, and for general account and technical support.

After a profile is created and an authorized user registers, OCSE authenticates a registrant. To do so, information obtained during the registration process is compared to information in the National Directory of New Hires (NDNH) to verify the authorized user’s name, Social Security number, and employment information. OCSE administrative staff will also call the employer to verify employment of registering individuals.

After verifying an authorized user’s information, OCSE administrative staff creates a Portal access account and notifies the authorized user via email to activate the account. Instructions and security procedures for account activation are provided in the email notification. If a registration authentication fails, the email notification will contain a notification of denial.

After activating the account, the authorized user can log into the Portal using the Federal Parent Locator Service (FPLS) Security Framework to access specific Portal programs for which the authorized user is approved. The login process accepts user credentials

(User ID 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 Portal is permitted. If the credentials are not valid, an “access denied” alert is displayed and access is not permitted. The Portal uses security software that monitors unsuccessful login attempts and will lock authorized user accounts. The Portal also monitors lack of use for 90 days and requests deactivation.

**3. Use of Improved Information Technology and Burden Reduction**

The technology used to complete ES and DI profile forms in conjunction with the Portal registration process minimizes respondents’ hourly burden because users populate the forms electronically, which eliminates the need to populate time-consuming paper forms, or to contact the help desk to provide the profile information. OCSE is able to quickly create user registration profiles and authenticate the user from key information provided on the profile form. Additionally, the automated registration process immediately captures information from the registration screens for use in verifying the authorized user, thereby eliminating burden costs to mail paper forms.

**4. Efforts to Identify Duplication and Use of Similar Information**

The ES and DI profile forms requests some information that OCSE request for other program requirements, such as name, employer, address, etc.; however, the purpose for which OCSE requires the information is unique to creating Portal profiles and authenticating Portal users. There is no possibility for duplication or use of similar information for the Portal registration because the Portal and the authorized user registration process is unique to OCSE.

**5. Impact on Small Businesses or Other Small Entities**

Not applicable.

**6. Consequences of Collecting the Information Less Frequently**

Submitting the ES or DI profile form and the Portal registration is a one-time process; therefore, not collecting information will prevent OCSE from fulfilling a statutory requirement to restrict access to confidential information and its use by verifying the identity of authorized users. Not collecting the information will also increase the risk of unauthorized access to and use of sensitive child support case information and personally identifiable information.

**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 published in the Federal Register at 84 FR 23683 on May 22, 2018, which allowed for a 60-day comment period for the public to submit in writing 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**

FPLS Security Framework provides secure access through the registration process. To ensure the confidentiality and security of the user's information, OCSE requires the following:

- Passwords on the OCSE Network are hashed using SHA-256.
- Social Security number, date of birth, and responses to challenge questions are stored encrypted using the NIST-standard Advanced Encryption Standard (AES).
- The Portal application uses TLS encryption. The Portal has its login server in the firewall's demilitarized zone (DMZ). Communications with the login server from outside must use TLS encryption.
- A User ID and password and a one-time access code along with the answer to a challenge question are required to access the Portal protected applications and data. Session authenticity is ensured by integral HTTPS and TLS 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**

OCSE's operation of the FPLS is a federal requirement for the primary purpose of helping child support agencies locate, establish, enforce, and collect child support. Sensitive information, if any, is justified because states are required to obtain sensitive information pertaining to the establishment of parentage and the establishment, modification, and enforcement of support obligations.

The Social Security number of an authorized user is collected during the registration process in order to verify the individual user's employment information through the NDNH. Additional information collected includes the name, date of birth, and employer information, which is necessary to ensure proper verification of individuals before creating an access account.

## 12. Estimates of Annualized Burden Hours and Costs

<b>Information Collection Instrument</b>	<b>Number of Respondents</b>	<b>Number of Responses per Respondent</b>	<b>Average Burden Hours per Response</b>	<b>Total Burden Hours</b>
Employer Services Profile	2,144	1	0.08	171.52
Debt Inquiry Insurer Profile	22	1	0.08	1.76
Portal Registration Screens	2,338	1	0.15	350.70

**Estimated Total Annual Burden Hours<sup>1</sup>: 524**

OCSE staff populated the ES and DI profile forms and completed the Portal registration screens to determine how long it takes to provide all of the required registration information. As a result, OCSE staff reported that it took an average of approximately five minutes (0.08 hours) to complete the ES Profile form and approximately five minutes (0.08 hours) to complete the DI Profile form. OCSE staff determined it took approximately nine minutes (0.15 hours) to enter the registration information into the registration screens.

The collective annual burden for the one-time Portal registration process is approximately 545 hours.

The estimated total annualized cost to the users for the collection of registration information is \$12,566.16, or an average cost of \$2.79 for each response. Costs were calculated using an average hourly wage rate of \$18.58 for employers, financial institutions, insurers, and tribal and state child support agencies<sup>2</sup>.

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

Respondents and record keepers do not incur any other costs to register for the Portal.

## 14. Annualized Cost to the Federal Government

OCSE maintains the registration screens and oversees the authentication process as part of

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<sup>1</sup>Burden hours rounded from 523.98

<sup>2</sup>Based on Bureau of Labor Statistics May 2016 National Compensation Survey

the Portal system, which is a small part of the overall operational activities and cost. Costs for the entire Portal system include federal salaries and benefits of \$653,330 and contractor and hardware/software costs of \$5,350,983. Total Estimated Annualized Cost for the Portal system to the federal government is \$6,004,313.

**15. Explanation for Program Changes or Adjustments**

Adding the ES and DI profile forms constitutes a program change. This, coupled with the boost in Portal registrants, increased the burden hour from the previous approval. OCSE adjusted the burden hour calculations accordingly and noted the revised estimates in #12.

Increases in the annual cost to the federal government from the previous information collection approval are for costs to develop and maintain new Portal applications that were added to expand the capabilities and services of the Portal. While the enhanced applications improve the services available to authorized users, they do not impact the respondent's overall burden to complete the registration process that must first be completed to obtain access to the applications maintained in the Portal system.

**16. Plans for Tabulation and Publication and Project Time Schedule**

Not applicable.

**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.

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.