

# **Electronic Document Exchange System**

**OMB Information Request  
0970-0435**

**Supporting Statement Part A – Justification**  
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Submitted by  
Office of Child Support Enforcement  
Administration for Children and Families  
U.S. Department of Health and Human Services

## **SUPPORTING STATEMENT A - JUSTIFICATION**

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

The federal Office of Child Support Enforcement (OCSE) offers the Electronic Document Exchange (EDE), formerly titled “Child Support Document Exchange System” (CSDES), application within the OCSE Child Support Portal (Portal). The EDE 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 EDE application to exchange child and spousal support case information electronically with other state child support agencies.

Using the EDE 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 EDE 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.

This request is for a revision to the approved information collection (see section A15 for a description of changes).

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

The EDE 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 EDE, which are routed to another state for response. The responding state then uploads the appropriate documents to the EDE for the requesting state to download for case processing.

State child support agencies that use the EDE 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 EDE 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 EDE application usage, but does not see or use the content of exchanged case information and documents.

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

The EDE application is in the secure Portal, which is part of the Federal Parent Locator Service. Because state child support agencies already access the Portal for other purposes, accessing the EDE application via the Portal encourages participation in child and spousal support document exchanges and improved child and spousal support outcomes. The EDE 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 EDE application electronically routes case information and documents on behalf of requesting and responding state child support agencies, which reduces operational costs that are associated with postage, faxing, copying, and handling. The EDE also greatly reduces document security concerns that are associated with exchanging hard copies.

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

The EDE is a unique application. For secure and efficient exchanges, there is no other application available to all state child support agencies that has the capability to serve as a central source for 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**

OCSE published a Notice in the *Federal Register* at 84 FR 1739 on February 5, 2019, which announced the proposed information collection activities and intentions for OMB approval. The notice also provided 60 days for the public to submit in writing any comments about this information collection. OCSE did not receive comments.

**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 EDE 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; OCSE maintains responses indicating that the documents are pending an upload, and all unsolicited documents, for a maximum of 60 days before deleting them.

**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 EDE 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 identify properly the case-related documents that state child support agencies exchange, thus ensuring that documents and information match an individual or an individual's case.

**12. Estimates of Annualized Burden Hours and Costs**

Thirty child support agencies currently use the EDE application. OCSE estimates that an additional eight child support agencies will participate in the EDE within the next three years.

The state child support agencies that are currently using the EDE application exchanged 39,686 documents, with each agency exchanging an average of approximately 1,323 documents. Based on these findings, and assuming there will be a similar exchange rate by all 38 state child support agencies, OCSE predicts that child support agencies will annually exchange approximately 50,274 documents.

To estimate burden hours per response, OCSE staff completed the required EDE application data entry screens that state child support agencies populate. On average, it took approximately .017 hours (60 seconds) to complete the screens. The total burden hour estimate is calculated and rounded to be 855 hours (50,274 documents x .017 hours).

To calculate the annualized costs to state child support agencies, OCSE used \$21.34 as the median hourly wage rate for agency staff.<sup>1</sup> Cost per response is \$0.356 (\$21.34/60 seconds), which translates into a total annualized cost of \$18,245.70 (\$21.34 x 855). With an estimated 38 child support agencies using EDE, the average annualized cost per respondent is approximately \$480.15 (\$18,245.70/38).

Information Collection Instrument	Total Number of Respondents	Total Number of Responses per Respondent	Average Burden Hour per Response	Annual Burden Hours	Average Hourly Wage	Annual Cost per Respondent
EDE Online Data Entry Screens	38	1,328	.017 (60 seconds)	855	\$21.34	\$480.15
<b>Estimated Annual Burden Total</b>				855	<b>Estimated Annual Cost Total</b>	\$18,245.70

### 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 EDE application cost OCSE \$437,708 to develop and implement in 2013. In

<sup>1</sup> Based on Bureau of Labor Statistics May 2017 National Industry-Specific Occupational Employment and Wage Estimates

FY2015, OCSE spent \$90,299 to enhance the EDE application. The EDE application is a small part of overall operational activities and cost of the OCSE Portal. The estimated annualized cost to the federal government for the entire Portal is \$6,004,313, which includes federal salaries and benefits, contractor costs, data center, and hardware/software costs.

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

This request is for a revision to the approved information collection. State child support agencies refer to the EDE application as the “Electronic Data Exchange” or “EDE,” which was the original name of the application. OCSE changed the application name to CSDDES, but reverted the program name to align with the EDE Online screen titles within the application rather than making costly changes to the application. 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 with 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.

Based on actual participation, the number of EDE users is less than the previous approval estimates; however, the number of documents exchanged increased, resulting in a slight adjustments to both the burden hour and cost estimates. Adjustments to the cost estimates also include OMB’s requirement to double the hourly rate to account for fringe benefits and overhead. This requirement constitutes a program change and is why the burden significantly increased since 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.