

# **Electronic Document Exchange**

**OMB Information Request  
0970-0435**

## **Supporting Statement Part A – Justification**

April 2022

Submitted by  
Office of Child Support Enforcement  
Administration for Children and Families  
U.S. Department of Health and Human Services

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

The federal Office of Child Support Enforcement (OCSE) maintains the Electronic Document Exchange (EDE) application which allows state child support agencies to exchange encrypted case-related documents. The EDE is a secure application that is accessible through the Child Support Portal (CSP) and is restricted to authorized users who registered for, and OCSE approved access to, the CSP.<sup>1</sup>

The activities associated with the EDE application are authorized 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 EDE application allows state child support agencies to effectively exchange documents pertaining to child and spousal support cases. State child support agencies submit case document requests to other states through the EDE, which are routed to the other state for response. The responding state uploads the appropriate documents to the EDE for the requesting state to download or explains when documents are unavailable.

State child support agencies that use the EDE application will reduce delays, costs, and barriers associated with 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 use the information collected, maintained, and disseminated through the EDE application for various child support purposes. OCSE maintains and tracks EDE application usage; however, OCSE does not see or use the content of exchanged documents.

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

The EDE application is housed in the existing CSP infrastructure and technology. The application improves child and spousal support outcomes by reducing time and cost burdens 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

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<sup>1</sup> *Child Support Portal Registration*, OMB Control Number: 0970-0370.

agencies, which reduces operational costs associated with postage, faxing, copying, and handling. The EDE also reduces document security concerns related to exchanging hard copies or unsecured electronic methods.

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

The EDE is a unique application. For secure and efficient exchanges, no other application exists as a central source for all state agencies to exchange 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**

Not exchanging case documents with other states through the EDE, or doing so less frequently, will adversely affect children and families receiving child and spousal support services from state child support agencies because it will cause states to revert to previous manual processes that will slow down case processing, information sharing, and support collection. It will also impact the agency's ability to reduce costs and diminish security of case information and documents, thereby impeding 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 insufficient for child support agencies to share child and spousal support case-related information quickly and efficiently. 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**

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), OCSE published a notice in the Federal Register at 86 FR 70843 on December 13, 2021. The notice announced OCSE's intention to seek OMB approval of a collection of information and to provide a 60-day comment period for the public to submit written comments about this information collection activity. OCSE did not receive comments.

**9. Explanation of Any Payment or Gift to Respondents**

Not applicable.

**10. Assurance of Confidentiality Provided to Respondents**

The Administration for Children and Families maintains an approved Privacy Impact Assessment for the CSP (“CSP PIA”), which documents the security controls in place to safeguard case information in documents collected and maintained in the EDE application, and how EDE information is safely processed and stored in a secure environment to ensure protection from unauthorized access. To further protect the shared information, child support agencies assign user roles that ensure control over who has access to the EDE application.

OCSE also safeguards confidentiality regarding requests and responses for documents because they are only stored for 60 days before deletion. OCSE maintains responses to documents with an upload in “pending” status and all unsolicited documents for a maximum of 90 days before deletion.

**11. Justification for Sensitive Questions**

OCSE does not ask sensitive questions for the EDE; however, a case number is required, and the documents and information exchanged may contain sensitive information about individuals involved in state child and spousal support cases. The CSP PIA documents how PII is secured using administrative, technical, and physical controls.

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

The state child support agencies currently using the EDE application exchanged approximately 4,662 documents annually. OCSE estimates all participating state agencies will annually exchange a combined total of approximately 228,438 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 3,883 hours (4,662 documents x .017 hours).

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
EDE Online Data Entry Screens	49	4,662	.017 (60 seconds)	3,883	\$46.56	\$180,792
<b>Estimated Annual Burden Total</b>				3,883	<b>Estimated Annual Cost Total</b>	\$180,792

OCSE calculated the cost to respondents using the Bureau of Labor Statistics (BLS) job code for Child, Family, and School Social Worker [21-1021] and wage data from May 2020, which is \$23.28 per hour. To account for fringe benefits and overhead, OCSE multiplied the rate by two, which is \$46.56. The estimated annualized cost to respondents for the burden is \$46.56 x 3,883 hours or \$180,792.

[https://www.bls.gov/oes/2020/may/oes\\_nat.htm#21-0000](https://www.bls.gov/oes/2020/may/oes_nat.htm#21-0000)

**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 estimated annualized cost to the federal government to operate and maintain the EDE application is approximately \$328,771. The entire CSP application that houses the EDE costs the federal government approximately \$6,392,360. The costs include federal salaries and benefits, contractor costs, data center, and hardware/software costs.

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

At the request of state child support agencies, OCSE made minor application enhancements to add options for request and response content; to expand case information; and to improve documentation content, 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.

OCSE removed the “Query FCR” screen from the EDE instruments because it is not a function of the EDE. OCSE provides a link to the FCR within the EDE application as a courtesy to users to easily access the FCR. This change does not affect the burden.

Based on actual participation, the number of EDE users and the number of documents exchanged increased since the previous approval. This constitutes a program change that required 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.

**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**

Not applicable.