Child Support Portal Registration

OMB Information Collection Request
0970 - 0370

Supporting Statement

Part A - Justification

Type of Request: Revision

Submitted By:
Office of Child Support Services
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 Services (OCSS), Division of Federal Systems, in the U.S. Department of Health and Human Services (HHS) maintains the Child Support Portal (Portal) as part of the Federal Parent Locator Service (FPLS). The Portal is a secure, web-based gateway to various child support applications for authorized users to view, update, upload, send, and receive vital information to support effective and efficient enforcement of child support cases.

To provide authorized users with secure access to the Portal, OCSS creates profiles in the Portal for employers, insurers, and financial institutions from information provided in "Employer Services" (ES) Profile and "Insurance Match Debt Inquiry" (IM) Agreement and Profile forms. OCSS sets up Portal preferences using information from the program-specific electronic National Medical Support Notice (e-NMSN), the electronic Incoming Withholding Order (e-IWO), and Federally Assisted State Transmitted Levy (FAST Levy) Financial Institution Profile forms. State child support agencies do not register for the Portal through OCSS because they manage and authenticate authorization for individual users via the state proxy server; however, states must provide OCSS with a profile form containing information for OCSS to establish account preferences.

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 FPLS 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 OCSS to implement security protections to prevent unauthorized access to information maintained by OCSS.

This request is for a revision of a currently approved collection. See A.15 for an explanation of changes.

2. Purpose and Use of the Information Collection

OCSS creates secure profiles for employers, insurers, and financial institutions based on information provided in the ES Profile and IM Agreement and Profile forms. After a profile is created and an authorized user registers, an automated process authenticates the user's identity. If automated authentication fails, OCSS administrative staff authenticates the 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.

After verifying an authorized user's information, the Portal automation process or OCSS administrative staff set the account to "verified" status for Portal access and notify 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.

Upon activation of the account, the authorized user can log on to the Portal using the FPLS Security Framework to access specific Portal programs for which the authorized user is approved. The log on process accepts user credentials (user ID, password, and access code) 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, the log-on page displays an "access denied" alert and prevents access.

In addition to creating authorized user profiles and accounts from the ES and IM Agreement and Profile forms information, OCSS developed the e-NMSN, e-IWO, and FAST Levy Profile forms to set up authorized users' process and capture preferences based on information collected from these program-specific profile forms. OCSS also created a State Profile form and uses information collected from states to establish certain process and capture preferences.

OCSS uses the Portal registration information to track login activity, provide general account and technical support, and to conduct an annual certification process against information in the NDNH. This certification verifies users who are active on the Portal but whose last certification date is greater than a year. A list of users with unverifiable information is sent to the Portal Help Desk for manual intervention.

3. Use of Improved Information Technology and Burden Reduction

The technology used to complete the ES and IM Agreement and Profile forms, and the e-NMSN, e-IWO, and FAST Levy Profile forms minimizes respondents' hourly burden because users may populate the forms electronically. This reduces the need to populate time-consuming paper forms or contact the Help Desk to provide the profile information. OCSS can 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 to verify the authorized user, which eliminates the costs for users to mail paper forms.

4. Efforts to Identify Duplication and Use of Similar Information

The ES and IM Agreement and Profile, and the e-NMSN, e-IWO, and FAST Levy Profile forms request some of the same information that OCSS requests for other program requirements, such as name, employer, address, etc.; however, OCSS requires the information to create Portal profiles, authenticate Portal users, and establish user preferences. There is no possibility for duplication or use of similar information for the Portal registration and profile process because the Portal is unique to OCSS and allows only one account per authorized user.

5. Impact on Small Businesses or Other Small Entities

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

6. Consequences of Collecting the Information Less Frequently

Submitting the agreement and profile, preferences profile forms, and registering for Portal access is a one-time process. Not collecting the information will prevent OCSS from verifying the identity and preferences of authorized users and fulfilling a statutory requirement to restrict access to confidential information. Consequently, this will 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

There are no special circumstances.

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 OMB regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), OCSS published a notice in the Federal Register at 89 FR 58165 on July 17, 2024. The notice announced that OCSS intends to seek OMB approval of collection of information and to provided a 60-day comment period for the public to submit written comments about this information collection activity. OCSS did not receive comments.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

OCSS is required to protect respondent information in accordance with the Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA); the Privacy Act, as amended in 1988; the Federal Information Security Modernization Act of 2014 (FISMA); and 42 U.S.C. § 653(m)(2), which requires the Secretary of HHS to establish and implement safeguards to restrict access to and use of confidential information to authorized persons. OCSS maintains the proper security controls to secure the information (87 FR 3550; January 24, 2022) and maintains a current Privacy Impact Assessment for the Portal (PIA: P-6339911-476655).

11. Justification for Sensitive Questions

The OCSS 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 regarding the establishment of parentage and the establishment, modification, and enforcement of support obligations.

The last four digits of an authorized user's Social Security number (last four digits) is collected during the registration process to verify the individual user's employment information through the NDNH. The user's name, date of birth, and employer information is also collected to ensure proper verification of individuals before creating an access account.

12. Estimates of Annualized Burden Hours and Costs

Estimated Burden Hours

Four OCSS employees populated the forms themselves and provided the estimated time per respons. The average of those outcomes are the hourly buren estimates.

Estimated Cost to Respondents

OCSS calculated the hourly burden cost to respondents using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2023, which is $21.27 per hour.

The increase in the total annualized costs from the previous approval is due to an increase in the hourly wage rate estimate derived from the most current BLS figures (https://www.bls.gov/oes/2023/may/oes211093.htm) and the inclusion of fringe benefits and overhead. To account for fringe benefits and overhead, OCSS multiplied the hourly rate by two, totaling $42.54.

Information Collection Title	Annual Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Annual Cost
Portal Registration Screens	16,268	1	0.15	2,440.20	$42.54	$103,106.11
Employer Services Profile	20,040	1	0.08	1,603.20	$42.54	$68,200.13
e-NMSN: Employer Profile	20	1	0.22	4.40	$42.54	$187.18
e-NMSN: State Profile	4	1	0.22	0.88	$42.54	$37.44
e-IWO Employer/Payroll Provider Profile	117	1	0.08	9.36	$42.54	$398.17
FAST Levy Financial Institution Profile	2	1	0.08	0.16	$42.54	$6.81
Insurance Match Debt Inquiry Agreement and Profile	6	1	0.08	0.48	$42.54	$20.42
Estimated Annual Burden Total:				**4,058.68**[1]	**Estimated Annual**	**$171,956.26**

[1] Note that the total in ROCIS is 4,057 due to rounding.

		Cost Total:	

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

OCSS maintains the registration screens and oversees the authentication process as part of the Portal system, which is a small part of the overall operational activities and cost. Costs for the annual operations, maintenance, and ongoing enhancements of the Portal framework and infrastructure include federal salaries and benefits of $881,001 and contractor and hardware/software costs of $6,192,633. The total estimated annualized cost for the Portal system to the federal government is $7,073,634.

15. Explanation for Program Changes or Adjustments

The number of Portal registrations and total number of profile submissions increased from the previous approval. These adjustments resulted in an increase in the burden. OCSS consolidated the "e-IWO S2S" and "e-IWO NPO" from the previous approval to fall under the "e-IWO Employer/Payroll Provider Profile" because all "e-IWO" respondents used the same form to provide OCSS information and the burden to do so is the same. OCSS previously identified the respondents by their file processing preference, rather than the instrument used. Page 6 of the previous and current e-IWO Employer/Payroll Provider Profile form provides respondents the two options for file processing preferences.

The information OCSS collects for the Portal registration and profiles remains the same, but the instruments underwent minor clarification revisions and edits to update "Office of Child Support Enforcement (OCSE)" to "Office of Child Support Services (OCSS)" and to remove "agreement" from the Employer Services Profile form. OCSS also removed the e-NMSN Plan Administrator form because there are no respondents. These program changes do not impact the burden.

Changes to the federal government's annual cost from the previous information collection approval pertain to general increases to operate, maintain, and enhance the Portal framework. Ongoing Portal enhancements improve the services available to authorized users; however, 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

Not applicable.