Electronic Document Exchange System

OMB Information Request 0970-0435

Supporting Statement Part A – Justification

April 2025

Type of Request: Revision

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) developed the Electronic Document Exchange (EDE) to give authorized state child support agencies (CSAs) a way to electronically exchange child support case documents to improve the efficiency of child support case processing.

The EDE is an application, accessible through the OCSE Child Support Portal (Portal)¹, that collects, maintains, and disseminates certain child and spousal support case information to help state CSAs administer their child support programs.

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 CSAs to have expedited procedures to obtain and promptly share information with other state CSAs; 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 of a currently approved collection. See A.15 for an explanation of changes.

2. Purpose and Use of the Information Collection

Authorized users in state CSAs access the EDE application to electronically exchange child and spousal support case information with other state CSAs. Using the EDE, state CSAs submit case document requests to other state CSAs, and the EDE routes the requests to other states 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 CSAs 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.

State CSAs 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.

¹ OMB No.: 0970-0370

3. Use of Improved Information Technology and Burden Reduction

Because the EDE application is housed in the existing Portal infrastructure, the application's technology improves child and spousal support outcomes by reducing state CSA case processing time and associated costs. The EDE application's electronically routing technology eliminates delays associated with exchanging hard copies, which reduces operational costs associated with postage, faxing, copying, and handling. The EDE also reduces document security concerns related to exchanging hard copies or through 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 CSAs 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. States will revert to previous manual processes that slow down case processing, information sharing, support collection, and efficient resolution of cases. It will also negatively impact the state child support agency's ability to reduce costs and to secure case information and documents.

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 CSAs 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 89 FR 97621 on December 9, 2024. The notice announced that OCSE intends to seek OMB approval of a collection of information and provided 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

OCSE ensures security controls are in place to safeguard case information in documents collected and maintained in the EDE application and that that information is processed and stored in a secure environment to ensure protection from unauthorized access. CSAs 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.

12. Estimates of Annualized Burden Hours and Costs

Each state CSA currently using the EDE application exchanged approximately 7,383 documents annually. OCSE estimates all participating state CSAs will annually exchange a combined total of approximately 361,767 documents.

To estimate burden hours per response, OCSE staff completed the required EDE application data entry screens that state CSAs populate. On average, it took approximately .017 hours (60 seconds) to complete the screens. The total burden hour estimate is calculated and rounded to 6,150 hours (361,767 documents x .017 hours).

Information	Number of	Number of	Average	Annual	Average	Annual
Collection	Respondent	Responses	Burden	Burden	Hourly	Cost
Instrument	S	per	Hour per	Hours	Wage	
		Respondent	Response			
EDE Online Data Entry Screens	49	7,383	.017 (60 seconds)	6,150	\$51.86	\$318,939

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 2023, which is \$25.93 per hour. To account for fringe benefits and overhead, OCSE multiplied the rate by two, which is \$51.86. The estimated annualized cost to respondents for the burden is \$51.86 x 6,150 hours, totaling \$318,939. https://www.bls.gov/oes/2023/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 EDE application is a small part of the overall operational activities and cost of the OCSE Portal system. The estimated annualized cost to the federal government for the entire Portal system is \$5,955,002, which includes federal salaries and benefits, contractor costs, data center, and hardware/software costs. An additional \$663,116 is spent annually operating and maintaining the specific EDE application.

15. Explanation for Program Changes or Adjustments

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. OCSE made minor enhancements to the EDE Portal screens. These changes do not impact the burden.

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.