

National Medical Support Notice - Part A (NMSN)

**OMB Information Collection Request
0970 – 0222**

Supporting Statement Part A - Justification

Type of Request: Revision

September 2025

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 Office of Child Support Enforcement (OCSE) developed the National Medical Support Notice (NMSN) - Part A in accordance with the Child Support Performance and Incentives Act of 1998 and the Employee Retirement Income Security Act of 1974. The laws required OCSE to promulgate NMSN regulations, which were issued jointly by the Departments of Health and Human Services and Labor.

The information collection activities associated with the NMSN are authorized by (1) 42 U.S.C. § 666, which requires all child support orders to include a provision for medical support, and where appropriate, enforced through the National Medical Support Notice; and (2) 29 U.S.C. § 1169, which provides for medical coverage pursuant to a qualified medical support order.

The NMSN Part A is a standard, required form that child support agencies (CSAs) use to ensure employers enroll dependent children in available employer-sponsored medical coverage, if required by a child support order. The Department of Labor develops and maintains the required Part B form (OMB #: 1210-0113) that employers use to inform a plan administrator that a participant is obligated by an order to provide health care coverage for dependent children.

This request is for a revision to the currently approved information collection. Please see A.15 for an explanation about the changes.

2. Purpose and Use of the Information Collection

OCSE developed and maintains Part A of the NMSN but does not receive or use the information collected on the NMSN - Part A because it does not administer child support cases.

CSAs must send the NMSN - Part A to employers for all child support cases receiving IV-D services in which a court or a tribunal has ordered a parent to provide medical support or health care coverage. Employers are required to complete and return the NMSN Part A to the issuing CSA and indicate whether insurance is available.

3. Use of Improved Information Technology and Burden Reduction

OCSE developed the NMSN Part A for states to send and receive health care information using existing systems. Once a court or other tribunal issues a child support health care order, the CSA enters the terms of the order and other data elements into their automated system, which generates the NMSN Part A for employers to process. Most CSAs send copies of the NMSN form to employers by mail while some states may upload the notice to the states' employer service portals.

OCSE also offers a fillable portable document format (PDF) version of the NMSN, which is available on the OCSE website. The PDF version provides CSAs and employers with an

efficient method for completing the NMSN. CSAs may print a limited number of these forms in hard copy for use in emergencies when automated systems are not available or in situations in which computer-generated forms are not available.

Employers and states may choose to use the OCSE e-NMSN process, which includes record specifications. The e-NMSN is an OCSE centralized Internet batch portal application that lets CSAs easily and securely send health care orders to employers. The OCSE portal receives e-NMSNs from CSAs and sends them to employers. The employers electronically acknowledge whether the NMSN is accepted or rejected. Employers can also use e-NMSN to report terminations of health care coverage. This technology decreases time spent processing child support medical coverage; reduces administrative expenditures for child support agencies; reduces processing costs for employers and health care providers; improves communication between child support agencies, employers, and health care providers and exchanges information in a consistent and uniform format.

4. Efforts to Identify Duplication and Use of Similar Information

Because the NMSN Part A is the required form to implement health care coverage for dependents, there is no duplication or use of similar information.

5. Impact on Small Businesses or Other Small Entities

After initial programming costs, the impact on small businesses and other small entities is minimal.

6. Consequences of Collecting the Information Less Frequently

Not collecting the information according to orders will violate federal law and will negatively affect availability of health insurance coverage for children and, when needed, delay enforcement of medical support.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

Once a state CSA sends the NMSN Part A to the employer, the employer is required to respond to the CSA within 20 business days. The employer must send the request to implement health care coverage to the plan administrator within 20 days. Failure to meet these deadlines violates federal law.

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 90 FR 26818 on June 24, 2025. The notice announced that OCSE intends to seek OMB approval of an extension of, with revisions to, the currently approved collection of information and to provide a 60-day comment period for the public to submit comments about this information collection. Four comments

were received; three (Michigan, a custodial parent, and a payroll organization) expressed how helpful the NMSN Part A form is for parents and employers to expedite health care coverage. The fourth comment, from Utah, requested additional elements for employers to complete to assist that state in enrolling children in health care. OCSE has not received similar feedback to date and since this is specific to one state at this time no updates were made. OCSE will keep this feedback in mind for the future.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

State and local CSAs populate the NMSN forms from their client data files and follow their state laws and procedures requiring assurances of confidentiality. Each state must have safeguards in effect to protect privacy rights (42 U.S.C. § 654(26)).

For employers and states that use the OCSE e-NMSN process, existing OCSE security measures safeguard the files and information.

11. Justification for Sensitive Questions

The NMSN Part A and e-NMSN require specific information, including names, birth dates, addresses, and SSNs of parents and children to ensure that the employer provides medical coverage for the correct individuals. When populating the forms, state and local CSAs must adhere to their laws and procedures regarding the collection and protection of sensitive information. Each state must have safeguards in effect to protect privacy rights (42 U.S.C. § 654(26)).

1. Estimates of Annualized Burden Hours and Costs

OCSE has revised the NMSN and estimates that it will take state CSAs about a year to implement the revised form. Table 1 below shows burden hour estimates for respondents to continue to use the currently approved NMSN during an initial implementation period for the updated version. Table 2 shows the burden estimates for respondents once the new version of the NMSN is fully implemented in 2026.

Estimated Burden Hours

The burden hour estimates for the NMSN Part A and e-NMSN are based on an OCSE pilot project that involved one state and one employer. We also used an estimated number of annual prospective states using e-NMSN, the number of notices issued annually by those CSAs, and the amount of time required to populate those notices. The estimated burden for employers opting to use e-NMSN was calculated similarly.

Overall, the estimated time per response remains the same, but the estimated number of respondents and number of responses has been updated to reflect assumptions for the next three years.

Estimated Cost to Respondents

For completion of the NMSN Part A, OCSE calculated state respondents' costs using the Bureau of Labor Statistics (BLS) wage data from May 2024 for the job code for Child, Family, and School Social Worker [21-1021] which is \$30.25 per hour. To account for fringe benefits and overhead, OCSE multiplied the hourly rate by two, which is \$60.50. OCSE calculated employer respondents' costs using the BLS job code for Payroll and Timekeeping Clerks [43-3051] which is \$27.34 per hour. To account for fringe benefits and overhead, OCSE multiplied the hourly rate by two, which is \$54.68.

There should be no average annualized cost for employers opting to use e-NMSN. It takes 30 seconds for the system to complete a response and does not require labor from payroll clerks. The same applies to state and local CSAs and their employees.

Table 1: Current Form in Use During Implementation through 2026

Information Collection Title	Total Number of Annual Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours*	Average Hourly Wage	Total Annual Cost
National Medical Support Notice – Part A – Notice to Withhold for Health Care Coverage - <i>States</i>	54	90,194	.17	827,981	\$60.50	\$50,092,851
National Medical Support Notice – Part A – Notice to Withhold for Health Care Coverage - <i>Employers</i>	1,310,727	3.72	.17	828,904	\$54.68	\$45,324,471
State Medical Support Contacts and Program Requirement Matrix - <i>States</i>	54	1	1	54	\$60.50	\$3,267
National Medical Support Notice – Part A – Notice to Withhold for Health Care Coverage e-NMSN record specification layout Electronic system to system – <i>States</i>	5	5,000	.01	250	\$0.00	\$0*
National Medical Support Notice – Part A – Notice to Withhold for Health Care Coverage e-NMSN record specification layout Electronic system to system – <i>Employers</i>	25	3.72	.01	1	\$0.0	\$0*
Estimated Annual Burden Hours and Costs				1,657,190		\$95,420,589

Table 2: Revised Form – Estimated Burden after 2026 Implementation

Information Collection Title	Total Number of Annual Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours*	Average Hourly Wage	Total Annual Cost
National Medical Support Notice – Part A – Notice to Withhold for Health Care Coverage <i>States</i>	54	86,818	.17	796,989	\$60.50	\$48,217,835
National Medical Support Notice – Part A – Notice to Withhold for Health Care Coverage <i>-Employers</i>	1,263,267	3.71	.17	796,742	\$54.68	\$43,565,853
National Medical Support Notice – Part A – Notice to Withhold for Health Care Coverage e-NMSN record specification layout Electronic system to system <i>- States</i>	7	5,000	.01	350	\$0.00	\$0*
National Medical Support Notice – Part A – Notice to Withhold for Health Care Coverage e-NMSN record specification layout Electronic system to system <i>- Employers</i>	25	3.72	.01	1	\$0.00	\$0*
Estimated Annual Burden Hours and Costs				1,594,082		\$91,738,688

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

Costs to state CSAs to program and implement the e-NMSN are estimated to be \$55,320 derived from the one pilot state in 2024. Costs to employer respondents to program and implement the e-NMSN should roughly equal the costs to states (\$55,320). *After system-to-system programming costs, there are no costs to employers or states to use the system-to-system e-NMSN process.

3. Annualized Cost to the Federal Government

The estimated annual cost to the federal government for e-NMSN is \$332,060. This includes the system enhancements and technical assistance contracting costs, telecommunications, security, data quality, and software and hardware costs incurred by OCSE in association with the e-NMSN.

15. Explanation for Program Changes or Adjustments

OCSE removed the State Medical Support Contacts and Program Requirement Matrix, which constitutes a program change. This change resulted in only a minimal overall reduction in burden costs because of an increase in employee wages. The overall burden hour was reduced due to a decrease in state responses and a decrease in the number of employer respondents. The time per response remains the same.

16. Plans for Tabulation and Publication and Project Time Schedule

There are no plans to publish results of this information.

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.