August 8. 2025

The Honorable Jeffrey Clark
Acting Administrator, Office of Information and Regulatory Affairs
Office of Management and Budget
Eisenhower Executive Office Building
Washington, D.C. 20250

Re: National Directory of New Hires (NDNH) Information Collection Request Renewal | OMB Control Number: 0970-0166

Acting Administrator Clark –

The Data Foundation respectfully submits this comment supporting the renewal of the National Directory of New Hires (NDNH) information collection request submitted to OMB by the Department of Health and Human Service's (HHS) Administration for children and Families (ACF), with strong emphasis on maintaining robust privacy protections and recognizing the system's essential value for child support enforcement and authorized administrative purposes.

Core Support for NDNH System Value

NDNH serves an important statutory purpose that directly benefits vulnerable children and families. As we have consistently advocated, the NDNH database is an essential cross-state and national tool for enforcing child support obligations and ensuring children receive the financial support owed to them. The system's primary function—enabling state child support agencies to locate parents across state lines and take appropriate interstate actions to establish, modify, or enforce child support orders—represents a fundamental child welfare infrastructure that must be preserved and protected.

Beyond its core child support enforcement mission, NDNH serves valuable authorized purposes under 42 U.S.C. 653(i), including helping administer certain programs, prevent overpayments, detect fraud, assess benefits, and recover funds. The system also supports multiple evaluations for anti-poverty programs across federal and state agencies to understand what works, when, and where—including how to make government more effective and efficient.

Strong Privacy Protections Remain Essential

Maintaining public trust in privacy protections is key to system integrity and child welfare outcomes. There is significant risk that even the perception of improper access to these systems could undermine public trust and affect data quality. If public trust in the privacy protections surrounding this system erodes, or if businesses perceive their confidential business

information is jeopardized in the reporting system, these perceptions could negatively impact both program integrity and the welfare of vulnerable children.

As OMB reviews this ICR, we continue to advocate for adherence to the "Five Safes" framework conceptually incorporated into the Foundations for Evidence-Based Policymaking Act of 2018, which evaluates data access across five key dimensions:

- **Safe Projects:** Is the data use appropriate and ethical?
- **Safe People:** Are users authorized and properly trained?
- **Safe Data:** Are appropriate disclosure controls in place?
- **Safe Settings:** Is the access environment secure?
- **Safe Outputs:** Are results properly protected?

Any access to NDNH data must occur within proper statutory and procedural bounds with appropriate oversight, clear documentation of specific business needs justifying access, and regular review of continued need for access.

Electronic Reporting Reduces Burden and Improves System Efficiency

Submission of new hires information is increasingly a negligible burden due to improved systems for electronic reporting. As a growing nonprofit organization that provides new hires information through an intermediary platform, we can attest that technological improvements have significantly streamlined the reporting process for employers. The supporting statement's burden estimates clearly demonstrate this technological evolution: electronic reporting requires only 0.00028 hours per response compared to 0.025 hours for manual reporting—a reduction of over 98% in per-response burden.

The Office of Child Support Enforcement's (OCSE) encouragement for employers to transition from manual to electronic reporting using existing technology and state systems represents sound policy that improves information security while reducing both hourly and cost burdens. The fact that approximately 83% of the nation's employees are employed by just 10% of employers—and that these larger employers typically report electronically in batch files—means that the vast majority of new hire records are processed through the most efficient and increasingly efficient reporting mechanisms.

We recognize that NDNH information serves a valuable purpose for the statutory goals of the child support enforcement program, and the dramatic reduction in reporting burden through electronic systems makes compliance more feasible for organizations of all sizes, including nonprofits and smaller employers who previously faced more significant administrative challenges. The multistate employer registration option further reduces burden by allowing employers with operations in multiple states to report to a single designated state rather than maintaining separate reporting relationships with each state.

Support for Technical Improvements and Data Quality

We commend OCSE's technical improvements that enhance both system functionality and data quality. The revision to NDNH record specifications removing unconventional date formats in favor of standard formats represents the kind of thoughtful system modernization that improves data quality and interoperability. Similarly, the updates to the Multistate Employer Registration Form—including revised language, updated links, and removal of the postal mail option in favor of electronic submission—reflect appropriate modernization that reduces processing time and improves data security.

These technical improvements demonstrate OCSE's commitment to maintaining a robust, secure, and efficient system that serves its critical mission while minimizing burden on reporting entities. The data quality improvements will enhance the system's effectiveness for all authorized users, from state child support agencies to federal programs that rely on NDNH data for program integrity purposes. We also recognize that there is much more that can be done in the future to improve data quality.

Conclusion

The Data Foundation strongly supports renewal of the NDNH information collection request. This system represents important infrastructure for children that has successfully evolved to reduce reporting burden while maintaining its mission. **The value of this data for statutory purposes of managing the child support enforcement program and supporting other authorized administrative and research activities cannot be overstated.**

The Data Foundation and our community strongly urges OMB to approve this renewal while continuing to emphasize the importance of strong privacy protections, adherence to statutory requirements, and transparent oversight of this vital system that serves America's children and families.

Respectfully,

Nick Hart, Ph.D.
President & CEO

About the Data Foundation

The Data Foundation is a non-profit organization based in Washington, D.C. that champions the use of open data and evidence-informed public policy to make society better for everyone. As a nonpartisan think tank, we conduct research, collaborative thought leadership, and advocacy programs that advance practical policies for the creation and use of accessible, trustworthy data. Our activities proactively address emerging data-related needs in the country with the goal of devising realistic solutions, accelerating policy coordination, and advancing innovation. The Data Foundation is recognized by Candid Guidestar with the Platinum Seal of Transparency and received 4-Stars from Charity Navigator. To learn more, visit www.datafoundation.org. (LEI: 254900I43CTC59RFW495)