

March 17, 2021

Mr. Jim Fleming President National Council of Child Support Directors <u>jfleming@nd.gov</u>

Re: Request for electronic National Medical Support Notice (e-NMSN) state-level support

Dear President Fleming:

The American Payroll Association (APA)¹ respectfully and urgently requests that the National Council of Child Support Directors (NCCSD) encourage its members to support their respective states in implementing the electronic National Medical Support Notice (e-NMSN). The APA's recommendation relates to the federal Office of Child Support's (OCSE) model currently scheduled to be available in mid to late June 2021 to allow states and employers to transmit their current paper NMSNs electronically.

Benefits of Electronic Communication for Employers and States

Today, many employers operate through electronic communication systems. With 75% of child support collected through income withholding (OCSE data), the role of payroll professionals and their employers is critical to the health, welfare, and financial stability of children living in the United States and abroad. The COVID-19 health and safety stay-at-home orders have made the need for electronic communication between state child support agencies and employers even more critical and immediate. The "new normal" will not reverse the trend toward virtual communication; if anything, the "new normal" will make virtual communication even more vital.

The APA understands that development efforts and priorities may impact states' abilities to implement e-NMSN, but we encourage states to consider the reduction in administration and mailing cost to help offset the development costs. The standard NMSN is generally 10 full pages. With copies included, a state easily spends \$0.70 to \$1.00 to mail a single NMSN. Sending those same 10 pages electronically would provide considerable savings.

¹ The APA is a nonprofit professional association serving the interests of about 20,000 payroll professionals in the United States. APA's primary mission is to educate payroll professionals about the best practices associated with paying America's workers while complying with all applicable federal, state, and local laws. APA's Government Relations Task Force (GRTF) works with legislative and executive branches of government to help employers understand their legal obligations, with significant emphasis on minimizing the administrative burden on government, employers, and individual workers.

Currently, employers are receiving NMSNs via paper. The option to receive them electronically not only expedites the transmission of the notice but also allows for an additional level of security. For states and employers to not have to send personally identifiable information via mail is an added benefit to the e-NMSN process. Being able to receive and respond to the NMSN electronically is an efficiency not only for states and employers but also the families waiting for the medical support to be implemented.

Consider the success of the electronic Income Withholding for Support Order (e-IWO), and the numerous benefits shared by employers and states. The information is processed faster and accuracy is increased. In addition, the ability to process child support orders through a central repository with a standard data format ensures that states are receiving employer responses in a timely and efficient manner.

The APA appreciates your attention to the e-NMSN and asks for your support as NCCSD President. If APA can be of assistance to any NCCSD member in pushing their state to allow for use of the e-NMSN, please contact us through Alice Jacobsohn at <u>ajacobsohn@americanpayroll.org</u> or 202-669-4001.

Sincerely,

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Corrinne Flores Chair, GRTF Subcommittee on Child Support

Jim Owen

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