SUPPORTING STATEMENT

November 2010

Financial Reporting Forms Child Support Enforcement Program

Form OCSE-34A: Quarterly Report of Collections

Form OCSE-396A: Quarterly Report of Expenditures and Estimates

A. Justification

1. Legal or Administrative Requirements to Collect Information.

The authorities to collect and report the information requested on these forms are found in the following sections of the Social Security Act (Act): 452(a)(6), 452(a)(10)(A), and 454(10).

State agencies administering State Plans approved under Title IV-D of the Act are required by statute in section 454(10) to maintain complete records and a system to report: (a) the amounts expended to administer and operate the program, (b) and amounts collected as child support payments from non-custodial parents, and (c) the child support payments distributed either to the custodial parents or to the appropriate Federal or State agency in accordance with section 457.

2. Purpose for Which Information Will Be Used

The information collected through the use of these forms is used to:

- Monitor program operations and prepare technical assistance and guidance as needed and in accordance with section 452(a)(7) of the Act;
- b. Compute the guarterly grant awards pursuant to section 455(b) of the Act:
- c. Determine that proper disposition of collections is being made according to the process set forth in section 457 of the Act;
- d. Enable OCSE to obtain data prior to the start of the fiscal year to estimate the incentive payments to be retained by each State. Also, to permit OCSE to calculate the actual amount of incentive payment due each State following the end of the fiscal year;
- f. Produce an annual financial and statistical report, when combined with information collected on Form OCSE-157, the "Annual Data Report." This report is available to the general public and includes a complete record of financial, statistical and programmatic information for the fiscal year.

3. Use of Technological Collection Techniques

Collection of this data is accomplished substantially through electronic means. All States have the opportunity to submit this information electronically, through the Internet-based "On-Line Data Collection" (OLDC) system maintained by ACF. A few States have elected to continue with paper submissions and in those cases the data is entered into OLDC by Federal staff in the Regional office.

Information from OLDC is transferred to the in-house "Grants Administration Tracking and Evaluation System" (GATES) for final approval by Federal staff, production of management reports and issuance of grant awards.

4. Efforts to Identify Duplication

Information collected in these reports is not available through any other Federal source.

5. Impact on Small Businesses

This form applies only to State governments. Small businesses are not involved.

6. Impact of Less Frequent Collection

This data is used quarterly by OCSE to compute grant awards. Failure to collect expenditure, estimate and collection data on a quarterly basis would preclude the Department from accurately calculating these quarterly awards.

7. Explanation of Special Circumstances of Information Collection

Collection of State financial data is consistent with guidelines. The information requested is necessary to satisfy statutory requirements.

8. Outside Consultation Regarding Data Collection

A standing Federal-State work group, with members representing each Federal region, was asked to review these reporting forms and provide suggestions and recommendations for changes and improvements. In addition, through a partnership with the National Council of Child Support Directors (NCCSD), comments were solicited specifically from the program directors of every State's child support enforcement agency. Interested members of the general public were also offered opportunities to comment on these forms with the publication of a <u>Federal Register</u> notice (75 FR 10805, March 9, 2010).

In response to these consultations and solicitations, this agency received insufficient comments or recommendations to support any substantial changes to these forms at this time. However, we continue to discuss improvements to these reporting forms with State grantees and, especially, with Tribal grantees and anticipate some minor revisions will be proposed in the near future. These revisions will be limited to any changes that may be necessitated by changes in Federal law and regulations, including the enactment and subsequent expiration of program requirements under the "American Recovery and Reinvestment Act of 2009" (ARRA) and changes to reporting instructions that will enable Tribal grantees to use the same quarterly collection report submitted by State grantees.

9. Payment or Gifts to Respondents

No member of the Federal-State Task Force or any respondent to our requests for comments received any remuneration for their participation.

10. Assurance of Confidentiality

There are no data collected that require confidentiality.

11. Questions of a Sensitive Nature

Data collected are not of a sensitive nature.

12. Burden Hour/Cost Estimate

34A		Form OCSE-396A	Form OCSE-
No. of Respondents Responses Per Respondent Burden Hours Per Response	54 4 6	54 4 14	
Total Burden Hours	1,296	3,024	
Aggregate Total Burden Hours		4,320	

The monetary value of these hours is 4,320 times \$30 or \$129,600.

13. Estimated Annual Cost Burden to Respondents

There is no cost burden to respondents.

14. Estimate of Federal Government Cost

Estimate average cost to the Federal government is \$50,000 per year. This includes the initial cost of developing and distributing forms, tabulating and analyzing collected data, and publishing aggregate information in an annual report.

15. Program Changes or Adjustments

No changes or adjustments are being proposed for these reporting forms at this time.

16. Analytical Techniques Needed For Publication of Information

Information on these forms is published in aggregate and State-by-State formats and in combination with other data collected by this Agency. The data are published following each fiscal year as received from the States in an annual report available to the general public. No complex analytical techniques are required.

17. Approval to Not Display Expiration Date

Such approval is not being sought; the expiration date will be shown as needed.

18. Exception to Certification Statement

None.

B. <u>Collection of Information Employing Statistical Methods</u>

Statistical methods are not used in collecting this financial information. The information supplied by the States must be auditable and in conformance with generally accepted accounting principles and cannot be reported using sampling, estimating or other statistical methodologies.