

THE SUPPORTING STATEMENT

A. Justification

1. Circumstances Making the Collection of Information Necessary

Federal law grants the Secretary of the Department of Health and Human Services (HHS) Office of Child Support Enforcement (OCSE) discretion to disclose information maintained in the National Directory of New Hires (NDNH) to state agencies operating IV-A Temporary Assistance for Needy Families (TANF) programs as follows:

“(3) INFORMATION COMPARISONS AND DISCLOSURES OF INFORMATION IN ALL REGISTRIES FOR TITLE IV PROGRAM PURPOSES.-To the extent and with the frequency that the Secretary determines to be effective in assisting States to carry out their responsibilities under programs operated under this part and programs funded under part A, the Secretary shall:

- (A) compare the information in each component of the Federal Parent Locator Service maintained under this section against the information in each other such component (other than the comparison required by paragraph (2)), and report instances in which such a comparison reveals a match with respect to an individual to State agencies operating such programs; and
- (B) disclose information in such components to such State agencies.”
42 U.S.C. 653(j)(3).

The Office of Management and Budget (OMB) requires OCSE to periodically report measures of the performance of the NDNH through the Program Assessment Rating Tool (PART), Quarterly Management Scorecard, the Exhibit 300 and other mechanisms. The Exhibit 300 requires OCSE to provide performance measures demonstrating how the system supports OCSE's strategic mission, goals and objectives. [See The Government Performance and Results Act of 1993 (P.L. 103-62); OMB Circular No. A-11, Section 300, especially subsection 300.3, citing the statutory bases for the results-oriented requirements contained in Exhibit 300; and the National Child Support Enforcement Strategic Plan FY2005-2009, Goal 5, Objective C.].

To assist OCSE in measuring and monitoring performance and reporting to OMB, the state TANF agencies have agreed to provide OCSE with a written description of the performance outputs and outcomes attributable to the State TANF Agency's use of NDNH match results. This quarterly description will include aggregate data with no personal identifiers.

2. Purpose and Use of the Information Collection

The Office of Management and Budget requires OCSE to periodically report measures of the performance of the NDNH through the Program Assessment Rating Tool (PART), Quarterly Management Scorecard, the Exhibit 300, and other resources. OCSE is required to provide performance measures demonstrating how the system supports OCSE's strategic mission, goals

and objectives, as well as the President's Management Agenda and cross-agency collaboration. The reports provided by State TANF Agencies will be used to provide information for the reporting mechanisms cited above. The information will be used by OCSE and the Office of Family Assistance (OFA) which has oversight of the State TANF programs. The purpose of requesting match results is to provide information for national reports regarding the effectiveness of the TANF/NDNH match. While OCSE can generate information on the number of matches provided, only the State TANF Agency can calculate actual cost savings based on those matches.

3. Use of Improved Information Technology and Burden Reduction

The information is to be sent electronically, e.g., by e-mail, on a quarterly basis.

4. Efforts to Identify Duplication and Use of Similar Information

No similar information currently exists in any other consolidated national database.

5. Impact on Small Businesses or Other Small Entities

No small entities are involved in this information collection.

6. Consequences of Collecting the Information Less Frequently

The Federal Office of Management and Budget requires OCSE to periodically report measures of the performance of the Federal Parent Locator Service, including the NDNH, through various Federal management devices, such as the Program Assessment Rating Tool, Quarterly Management Scorecard, and the Exhibit 300. OCSE is required to provide performance measures demonstrating how the system supports OCSE's strategic mission, goals and objectives.

To assist OCSE in its compliance with Federal reporting requirements, the State Agency must report performance outputs and outcomes attributable to the State Agency's use of NDNH match results quarterly.

Not conducting quarterly TANF/NDNH matches would result in the loss of cost-savings data and performance measures that are required to be reported on a quarterly basis.

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

N/A

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

The notice of information collection was published in the Federal Register for public comment on September 21, 2011 in Volume 76, pages 58518-58519. We received no comments.

9. Explanation of Any Payment or Gift to Respondents

N/A

10. Assurance of Confidentiality Provided to Respondents

N/A

11. Justification for Sensitive Questions

N/A

12. Estimates of Annualized Burden Hours and Costs

- The burden hours given are based upon conversations with the District of Columbia TANF program (DC). DC matched with the NDNH on a pilot basis and reported substantially similar information to that requested by this survey instrument.
- Other TANF programs may vary from DC’s burden hours.
- Time to collect the data for each individual TANF recipient is not counted in the burden hours for this collection, as the data elements requested would be collected as a part of the customary and usual business practice of tracking the cost/benefit ratio of matching against the NDNH.
- According to DC, the time required to run the programs to accumulate the data elements across a quarter and prepare in a report format is approximately 10 minutes (.17 hours) per respondent per report.

ANNUAL BURDEN ESTIMATES

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
TANF/NDNH Match Results Report	12	4	.17	8.16

Estimated Total Annual Burden Hours: 8.16

The annualized costs to respondents for the hour burdens are based on an average compensation (including fringe benefits, etc.) of \$40 per hour for state level employees transmitting data (Bureau of Labor Statistics, September 2011.)

Reporting Requirement	Average Annualized Cost Per Respondent	Total Annualized Cost
State TANF Agencies	\$27	\$326.40
Total		\$326.40

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

There are no capital or start-up costs, and no ongoing costs, as the information is collected on an existing desk-top application.

14. Annualized Cost to the Federal Government

On an annual basis, we estimate that this data collection and analysis will cost the federal government \$23,880. This includes the federal match cost for NDNH of approximately \$21,000 and an hourly federal staff cost of \$72 compensation (including fringe benefits, etc.) for an estimated 40 hours that will be required annually to complete necessary tasks. The 40 hours include time for collecting and analyzing the data, answering questions from those submitting reports, and publishing reports on the results.

15. Explanation for Program Changes or Adjustments

Because the number of respondents has been reduced, there is a decrease in the annual burden. Previously, the number of respondents was 40 States who gave four annual responses per year, which totaled 160 annual responses leading to an estimated annual total burden hour of 27 hours. In FY2012, there are currently only 12 states participating in the NDNH database. With each State giving four annual responses, this results in 48 total annual responses leading to an estimated total burden hour of 8.16 hours.

There are no program changes because there are no changes to the purpose or frequency of the information collection, only an adjustment to the annual burden.

16. Plans for Tabulation and Publication and Project Time Schedule

After receiving the information at the end of each quarter and after conducting a simple analysis, we will tabulate the data and create reports displaying the information for each state. After data for the complete fiscal year have been submitted, we will produce a summary of annual results and findings. We will also compare the employment information from this report to employment information collected elsewhere to analyze the relationship between the two sources. In addition to the above, we will utilize this information to report on the effectiveness of the NDNH match and to estimate annual state savings from conducting the match.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

N/A

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification statement.

B. Statistical Methods (used for collection of information employing statistical methods)

The information collection requirements outlined in this report do not employ the use of statistical methods.