

**Supporting Statement For  
OMB Clearance**

**of**

**ADP & Services Condition for Federal Financial Participation (FFP)**

June 2013

Prepared by:

U.S. Department of Health and Human Services  
Administration for Children and Families  
Office of Child Support Enforcement  
370 L'Enfant Promenade S.W.  
Washington, DC 20447

## TABLE OF CONTENTS

Section	Page
A.	JUSTIFICATION.....3
1.	Circumstances Making the Collection of Information Necessary .....4
2.	Purpose and Use of the Information Collection.....4
3.	Use of Improved Information Technology and Burden Reduction.....5
4.	Efforts to Identify Duplication and Use of Similar Information.....5
5.	Impact on Small Businesses of Other Small Entities.....5
6.	Special Circumstances Relating to Guidelines of 5 CFR 1320.5.....6
8.	Comments in Response to the Federal Register Notice and Efforts to Consult the Outside Agency .....6
9.	Explanation of Any Payment or Gift to Respondents.....6
10.	Assurance of Confidentiality Provided to Respondents.....7
11.	Justification for Sensitive Questions.....7
12.	Estimates of Annualized Burden Hours and Costs.....7
13.	Estimate of other Total Annual Cost Burden to Respondents and Record Keepers.....8
14.	Annualized Cost to the Federal Government.....9
15.	Explanation for Program Changes or Adjustments.....9
16.	Plans for Tabulation and Publication and Project Time Schedule .....9
17.	Reason(s) Display of OMB Expiration Date is Inappropriate.....9
18.	Exception to Certification for Paperwork Reduction Act Submissions.....9
B.	STATISTICAL METHODS .....10

**A. JUSTIFICATION**

**1. Circumstances Making the Collection of Information Necessary**

This information collection is necessary to fulfill requirements of 45 CFR Part 95, Subpart F, State Systems Advance Planning Document (ADP) Process, which governs the process by which states may obtain approval from the U.S. Department of Health and Human Services (HHS) for federal financial participation (FFP) in the costs of acquiring ADP equipment and services.

**2. Purpose and Use of the Information Collection**

The purpose of this information collection is to assist HHS in determining if a state is eligible for FFP to acquire ADP system equipment and services. To do so, states must submit a proposal to HHS demonstrating sound project planning and management, and provide evidence that it is necessary for efficient and effective administration of HHS public assistance programs

**3. Use of Improved Information Technology and Burden Reduction**

HHS allows ADP documents to be transmitted by e-mail, and large files may be submitted by CD-ROM or DVD media.

**4. Efforts to Identify Duplication and Use of Similar Information**

There is no duplication or use of similar information because the ADP information collection is unique to HHS grant-in-aid programs.

**5. Impact on Small Businesses or Other Small Entities**

There is no impact on small businesses or other small entities.

**6. Consequences of Collecting the Information Less Frequently**

It is not necessary to collect the information quarterly. HHS requires annual updates for ADP. This not only reduces burdens to the state, but it also to permits states to allocate funds in their budgets for the state share of information technology (IT) expenditures. For those states with multi-year IT authority, the federal program offices have discretionary authority to approve federal funding for a longer period of time.

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

Not applicable.

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

A notice of this proposed information collection was published in the *Federal Register* at 78 FR 14556 ; March 6, 2013, which allowed for a 60-day comment period for the public to submit in writing any comments about this information collection. No comments were received.

**9. Explanation of Any Payment or Gift to Respondents**

Not applicable.

**10. Assurance of Confidentiality Provided to Respondents**

Confidential information is not collected.

**11. Justification for Sensitive Questions**

Sensitive questions are not asked.

**12. Estimates of Annualized Burden Hours and Costs**

Table 12.1

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
RFP and Contract	54	1.5	4	324
Emergency Funding Request	5	.1	2	1
Biennial Reports	26	1	1.50	39
Advance Planning Document	34	1.2	120	4,896
Operational Advance Planning Document	20	1	30	600
Total	139	4.8	157.5	5,862

**Total Annual Burden Hours:**

5,862

12.2. Respondents Cost for Hour Burden

The annualized cost to State respondents for the burden hours is based on the average wage rate of \$36.95 per hour. Cost per response is estimated to be \$0.234(\$36.95/157.50 hours), which translates in to an average annualized cost per respondent of 216,600.90 (\$36.95 x 5,862). The average annualized cost per respondent is \$1,592.65 (\$216,600.90/139)

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

There are no additional direct costs to respondents.

**14. Annualized Cost to the Federal Government**

The estimated annual cost to the federal government is \$2,503,988. The cost is based on the approximate annual salaries of twenty-one GS-14 full time equivalent federal employees (14.0 which are CMS) required to oversee the ADP program, calculated as follows: \$119,238 (average GS-14, step 5 salary) x 21 federal employees.

**15. Explanation for Program Changes or Adjustments**

The ADP FFP underwent program changes provided in Final Rule 45 CFR Part 95 Subpart F, published at 75 FR 66319 on October 28 2010. The program requirements were changed so that not all states are required to submit an Annual Planning Document; however the rule provides state the option to submit an Operational Advance Planning Document Update where there in operational and maintenance phrase; which increase the burden hours.

**16. Plans for Tabulation and Publication and Project Time Schedule**

Not applicable.

**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 to the certification statement.

SUPPORTING STATEMENT:

**PART B – COLLECTION OF INFORMATION EMPLOYING  
STATISTICAL METHODS**

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