

SUPPORTING STATEMENT

May 2017

Financial Reporting Forms Child Support Enforcement Program

Form OCSE-34: “Quarterly Collection Report”
Form OCSE-396: “Quarterly Financial Report”

A. Justification

1. Circumstances Making the Collection of Information Necessary.

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 and Use of the Information Collected.

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

- a. 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 quarterly 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 Improved Information Technology and Burden Reduction.

In accordance with ACF policy published in the Federal Register June 28, 2013 (78 FR 38989 et. seq.) all grantees are required to electronically file financial reports online. ACF maintains OLDC, the “On Line Data Collection” system as the electronic online data entry portal for grantees for many grant programs.

All grantees for this program submit their financial data online. The financial data entered by each grantee for Forms OCSE-396 and OCSE-34 is transferred to GATES, the in-house “Grants Administration Tracking and Evaluation System,” where it is thoroughly reviewed and approved by

Federal financial staff before used in the production of management reports and issuance of quarterly grant awards.

At the time of this Supporting Statement, GATES is in the process of being updated with a new “Mandatory Grants Module,” scheduled to be implemented for FY 2018.

4. Efforts to Identify Duplication and Use of Similar Information

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

5. Impact on Small Businesses or Other Small Entities

These forms are completed only by State and Tribal governments. Small businesses and other entities are not involved.

6. Consequences of Collecting the Information Less Frequently

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

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

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

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

This request for re-approval of this data collection was circulated to all Federal Regional Offices and, through them, to all State and Tribal grantees.

In response to the Federal Register Notice (82 FR 10775, February 15, 2017), we received only two requests for information from State agencies and no comments or recommendations to support any additional changes to either the reporting forms or instructions, other than those generated by amended Federal regulations and detailed in Item 15, below.

9. Explanation of Any Payment or Gifts to Respondents

No respondent to our requests for comments received any remuneration for their participation.

10. Assurance of Confidentiality Provided to Respondents

The request for comments comes with no expectation of privacy or confidentiality. Any received comments, suggestions or criticisms would be distributed to all grantees and other interested parties for review and further discussion, if warranted.

11. Justification for Sensitive Questions

Data collected are not of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

	Form OCSE-396	Form OCSE-34
No. of Respondents	54	114
Responses Per Respondent	4	4
Burden Hours Per Response	6	14
Total Burden Hours	1,296	6,384
Aggregate Total Burden Hours		7,680

The burden hours for State respondents completing Form OCSE-396 are valued at \$28.85 per hour, the average hourly rate in 2017 for a GS-11, Step 1 Federal employee in the “Rest of the US.” The burden hours for State and Tribal respondents completing Form OCSE-34 are valued at \$26.26 per hour, the average hourly rate in 2017 for a GS-10, Step 1 Federal employee in the “Rest of the US.”

The aggregate total burden hours is valued at **\$205,033** (1,296 hours @ \$28.85 plus 6,384 hours @ \$26.26.)

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

There is no cost burden to respondents.

14. Annualized Cost to the Federal Government

Estimate average cost to the Federal government is \$50,000 per year. This includes the initial cost of incorporating periodic form changes into online programming, using collected data in the computation of quarterly Notices of Award, tabulating and analyzing collected data, and publishing aggregate information in an annual report.

15. Explanation for Program Changes or Adjustments

Form OCSE-396 and Form OCSE-34: Amended Federal regulations at 45 CFR 304.25(b) (81 FR 93568, December 20, 2016) changed the submission due date of these forms from “30 days” to “45 days” following the end of each fiscal quarter.

Form OCSE-396: Delete Line 6. “Automated Data Processing (ADP) Expenditures That Do Not Require an Advanced Planning Document.”

With the amendment of Federal regulations found at 45 CFR Part 95 (75 FR 66319 et. seq., October 28, 2010) all expenditures for a Statewide Child Support Enforcement System now require an approved Advanced Planning Document (APD) and will be reported only on Lines 4 and 5. This eliminated the need for Line 6 on Form OCSE-396, “APD Costs Without APD Required.”

Line 6 will be relabeled as “(Reserved)” to avoid any confusion and the need to renumber Lines 7 through 16.

Instruction Changes: The accompanying instructions will be updated to reflect the changes detailed above

16. Plans for Tabulation and Publication and Project Time Schedule

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

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

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

18. Exception to Certification for Paperwork Reduction Act Statement

None.

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

Not applicable. The financial 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.