

Tribal Child Support Enforcement Annual Data Report - OCSE-75

**OMB Information Collection Request
0970 - 0320**

Supporting Statement Part A - Justification

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Submitted By:
Office of Child Support Enforcement
Administration for Children and Families
U.S. Department of Health and Human Services

SUPPORTING STATEMENT A – JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The federal Office of Child Support Enforcement (OCSE) within the Administration for Children and Families (ACF) oversees the administration of 60 Comprehensive Tribes or Tribal organizations that currently operate child support enforcement programs and one Start-Up Tribe or Tribal organization. The Start-Up Tribe or Tribal organization does not submit the OCSE-75 form. The Federal government sets program standards and policy, evaluates Tribal program performance, and offers technical assistance and training to the tribes.

In its oversight role, the Federal government receives data from the Tribes through the OCSE-75 Tribal Child Support Enforcement (CSE) Annual Data Report. They then compile and evaluate these data for presentation in the Preliminary and Annual Data Reports. The authority to collect and report information requested on this form is Title IV-D of the Social Security as required by CFR 45 Section 309.170(b).

Currently there are fourteen reporting lines that were developed on the OCSE-75 Tribal CSE Data Report form. These lines were developed to allow Tribes and Tribal organizations to report program status and accomplishments.

2. Purpose and Use of the Information Collection

The data collected on the OCSE-75 form are used to evaluate Tribal IV-D programs and to prepare the preliminary and annual reports. In addition, Tribes administering Child Support Enforcement Programs under Title IV-D of the Social Security Act are to report program status and accomplishments for each Tribe on the OCSE-75 form.

3. Use of Improved Information Technology and Burden Reduction

Tribes have one way to submit the OCSE-75 form: (1) electronically through the Online Data Collection System (OLDC). The use of OLDC reduces the burden hours it takes for a Tribe to submit their report.

4. Efforts to Identify Duplication and Use of Similar Information

The OCSE-75 form is the only method used by Tribes and Tribal organizations to report statistical child support information to the Federal government. Data are not reported elsewhere and there is no other similar form in use by OCSE/ACF.

5. Impact on Small Businesses or Other Small Entities

This reporting requirement is imposed on Tribes and Tribal organizations. There are no small businesses involved in the information collection.

6. Consequences of Collecting the Information Less Frequently

The data collected on the OCSE-75 form are used annually by OCSE to evaluate Tribal programs, to identify areas where program improvement may be required, and to set in motion tailored strategies for achieving such improvement. Failure to collect this data annually would preclude OCSE/ACF from monitoring and evaluating the success of the program.

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

There are no special circumstances.

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

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on August 12, 2019, Volume 84, Page 39852, and provided a sixty-day period for public comment. During the notice and comment period, we did not receive comments.

9. Explanation of Any Payment or Gift to Respondents

No payments or other remuneration to respondents are made for the collection of this information.

10. Assurance of Confidentiality Provided to Respondents

No assurances of confidentiality are necessary for the types of data reported on the OCSE-75 form. Data are reported in the aggregate and no personal information is requested.

11. Justification for Sensitive Questions

Data are reported only on an aggregate basis. There are no data or personal information of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

Information Collection Title	Total Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
OCSE-75	60	1	60	3,600	\$50.00	\$180,000

The cost to respondents was calculated using position descriptions found in tribal plans. According to information reported in the tribal plans, the average wage rate for a Tribal IV-D Director who prepares and submits the OCSE-75 form is \$25/hour. To account for fringe benefits and overhead the rate is multiplied by two, which is \$50. The estimate of annualized cost per respondents is \$50 times 60 hours or \$3,000. The total estimated annual cost for all respondents is \$180,000.

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

There is no additional cost to respondents.

14. Annualized Cost to the Federal Government

The annualized costs to the Federal Government for the hour burdens are based on an average wage rate of \$47 per hour for Federal employees (grades 12-15) who distribute, tabulate, and analyze the data submitted in the OCSE-75 forms. Estimates regarding the hours spent processing each Tribal OCSE-75 form submission (4 hours average for each Tribal OCSE-75 form submission) was determined by employees' experiences in distributing, tabulating, and analyzing the data submitted on the form. Five Federal employees review each of the form submissions by completing various tasks. Five Federal employees multiplied by 4 hours, multiplied by \$47 per hour, multiplied by 60 responses, equals a total cost to the Federal Government of \$56,400. The Average Wage Rate of \$47 per hour for Federal level employees who distribute, tabulate, and analyze the data submitted on the OCSE-75 form comes from the Bureau of Labor Statistics:

https://www.bls.gov/oes/current/oes_nat.htm

Regional Program Manager	Management Analyst (13-1111)	\$45.38/hour
Regional Program Specialist	Misc. Social Scientist (19-3090)	\$41.02/hour

Tribal Coordinator	Managers, Other (11-9199)	\$55.57/hour
Management Analyst	Management Analyst (13-1111)	\$45.38/hour
Grants Officer	Financial Analyst (13-2051)	\$48.55/hour

Average Wage Rate $(45.38+41.02+55.57+45.38+48.55)/5 = \47.18 or \$47/hour

15. Explanation for Program Changes or Adjustments

Since the previous approval, the number of respondents has decreased from 63 respondents to 60 respondents due to changes in the numbers of tribal child support programs. Additionally, there was an error in the previous submission (approved March 2017): the burden hours per response was erroneously reported in the Supporting Statement as 63 hours when it should have been 60 hours per response. The previously approved form correctly showed 60 hours per response. This submission updates the Supporting Statement to correctly reflect an estimated response time of 60 hours, but the form has not changed.

16. Plans for Tabulation and Publication and Project Time Schedule

Information on this form will be published in aggregate on a Tribe-by-Tribe basis. The data are published at the end of each fiscal year in a preliminary report and an annual report to Congress and is included in other agency publications that highlight child support data.

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

The expiration date will be displayed on the OCSE-75 form.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification statement.