Tribal Budget and Narrative Justification Template

OMB Information Collection Request

0970 - NEW

Supporting Statement Part A - Justification

May 2020

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**

 To receive child support funding under 42 U.S.C. 655(f) and 45 CFR Part 309, tribes and tribal organizations must submit the financial forms described in 45 CFR 309.130(b) and other forms as the Secretary may designate, due no later than August 1 annually. The optional Tribal Budget and Narrative Justification Template will help to improve efficiency and establish uniformity and consistency in the annual budget preparation, submission and review processes. Tribes may use the Excel or Word version of the template to prepare and submit the required financial information.

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

The Office of Child Support Enforcement (OCSE) is proposing to collect data using a new financial reporting form, Tribal Budget and Justification Narrative Template. The template is an optional form tribes may use to prepare and submit their budget and justification narrative in accordance with the tribal child support regulations. The form is available in two formats, Excel and Word, for the convenience of the tribes and may be used by OCSE to review the annual budget applications.

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

This optional template helps to improve efficiency; establishes uniformity and consistency in the budget preparation, submission, and review processes; and reduces errors and OCSE requests to the tribes for additional information. Tribes may use the Excel or Word version of the template to submit the required financial information. The Excel version has preset formulas.

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

The collection of information requirements contained in this form does not duplicate any other reporting or recordkeeping requirements. It is the intent of this tool to improve efficiency for the tribe in preparing and submitting the required annual budget application.

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

The collection of information requirements does not impact small businesses or entities.

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

To receive child support funding under 45 CFR Part 309, tribes and tribal organizations must submit the financial forms described in 45 CFR 309.130(d) and other forms as the Secretary may designate, due no later than August 1 each year.

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

The collection of information does not involved any special circumstances.

1. **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 February 7, 2020, Volume 85, Number 26, page 7308, and provided a 60-day period for public comment. We did not receive any comments.

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

No payment or gift is provided to respondents.

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

The information collected does not require assurances of confidentiality.

1. **Justification for Sensitive Questions**

The required information collection does not involved asking questions of a sensitive nature.

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

We estimate that preparing and submitting a tribal budget application using the optional Excel template will impose an annual burden of 16 hours per respondent, while preparing and submitting a tribal budget using the optional Word template will impose an annual burden of 20 hours per respondent. The combined total annual burden of this collection is 1,000 hours. This is a new collection activity.

*Respondents’ Hour Burden*

The estimate of burden to respondents is based on these assumptions:

* The respondents include 60 tribes or tribal organizations submitting the optional Excel or Word templates.
* The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Community Service Managers [11-9151] and wage data from May 2019, which is $32.28 per hour (median). To account for fringe benefits and overhead the rate was multiplied by two, which is $64.56. The estimate of the annualized cost to respondents for hour burden is $64.56 times 1,000 hours, or $64,560.

https://www.bls.gov/oes/current/oes119151.htm

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| --- | --- | --- | --- | --- | --- | --- |
| 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 |
| Tribal Budget and Narrative Justification – Excel | 50 | 1 | 16 | 800 | $64.56 | $51,648 |
| Tribal Budget and Narrative Justification – Word | 10 | 1 | 20 | 200 | $64.56 | $12,912 |
| **Estimated Annual Burden Total:** | **1000** | **Estimated Annual Cost Total:** | **$64,560** |

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

There are no other costs to respondents and record keepers.

1. **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 $42 per hour for federal employees (grades 12-14) who review submitted tribal budgets from respondents. Estimates regarding the hours spent processing each tribal submission (5 hours average per tribal budget at one hour per person) was determined by employees’ experiences in reviewing tribal budgets. Five federal employees review each tribal submission. Five federal employees multiplied by 1 hour, multiplied by $42 per hour, multiplied by 60 responses, equals an annual cost to the federal government of $12,600.

The Average Wage Rate of $42 per hour for federal level employees who review submitted tribal budgets comes from the Bureau of Labor Statistics: <https://www.bls.gov/oes/current/oes_nat.htm>

Regional Program Manager Management Analyst (13-1111) $40.99/hour

Regional Program Specialist Misc Social Scientist (19-3090) $39.37/hour

Tribal Program Specialist Misc Social Scientist (19-3090) $39.37/hour

IT Specialist Computer & Information Analyst (15-1120) $44.40/hour

Grants Officer Financial Examiner (13-2061) $44.39/hour

Average Wage Rate (40.99+39.37+39.37+44.40+44.39)/5 = $41.70 or

$42.00/hour

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

This is a new information collection.

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

Data collection occurs from July 1 – September 30 on an annual basis. The data collected will not be published. It will only be used to approve annual budget submissions.

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

Not applicable.

1. **Exceptions to Certification for Paperwork Reduction Act Submissions**

No exceptions are necessary for this information collection.