

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

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. In its oversight role, the federal government receives data from the tribes through the OCSE-75 Tribal Child Support Enforcement (CSE) Annual Data Report. The start-up tribe or tribal organization does not submit the OCSE-75 form. The authority to collect and report information requested on this form is Title IV-D of the Social Security as required by 45 CFR Section 309.170(b). The federal government sets program standards and policy, evaluates tribal program performance, and offers technical assistance and training to the tribes.

Currently, there are thirteen reporting lines on the OCSE-75 Tribal CSE Data Report form. They allow tribes and tribal organizations to report program status and accomplishments. OCSE compiles and evaluates the data from the OCSE-75 form for presentation in the Annual Report to Congress.

This request is to extend approval with revisions. Edits to the form include:

- the addition of reporting the total number of tribal cases open during the fiscal year
- eliminating the reporting of children ever needing paternity established and instead reporting the number of children in open cases
- adjusting the reporting of children with paternity concluded to be at any time rather than during the fiscal year
- eliminating the tribal jobless rate reporting
- adding a revision deadline in the instructions
- clarifying a few items in the instructions

2. Purpose and Use of the Information Collection

The data are used to evaluate tribal child support programs and to prepare the Annual Report to Congress. The information on this form is published in aggregate and on a tribe-by-tribe basis. The data is used in other agency publications such as tribal fact sheets and presentations about the tribal child support program. The data collected aids in providing technical assistance to the programs around paternity establishment, caseload, and collections.

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: 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 tribes and tribal organizations use to report annual statistical child support information to the federal government. Data are not reported elsewhere, and there is no other 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 with IV-D programs. There are no small businesses involved in the information collection.

6. Consequences of Collecting the Information Less Frequently

Annually, OCSE uses the data collected on the OCSE-75 form to evaluate tribal programs, identify areas where program improvement may be required, and 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. Without the appropriate data, OCSE would not be able to provide tailored technical assistance and support tribal child support programs.

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 December 6, 2021 (Volume 86, Number 231, page 69062) and provided a 60-day period for public comment. During the notice and comment period, one comment was received in

support of this information collection.

As the OCSE-75 form was due for renewal, OCSE engaged a workgroup to address clarifications needed to the form to improve reporting. The workgroup began meeting in March 2021. There were seven tribal members on the workgroup while OCSE had nine representatives. This workgroup met approximately 10 times to discuss changes to the form. The tribal directors brought suggested changes back to their tribal directors association for discussion. All members reached consensus on the final edits.

9. Explanation of Any Payment or Gift to Respondents

There are no payments or other remuneration to respondents 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; 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	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
OCSE-75 for FY 2022	60	1	40	2,400	2,400	\$52.00	\$124,800
OCSE-75 for FY 2023 and forward	61	2	40	4,880	2,440	\$52.00	\$253,760

The burden estimate is based a single annual report filing for 60 tribal child support programs in FY 2022. OCSE expects to approve a new tribal child support program for FY 2023 which increases the respondents to 61 for the single annual report filing in FY 2023 and again in 2024.

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 2020, which is \$26.00 per hour. The rate was multiplied by two to account for fringe benefits and overhead, which is \$52.00. The total estimated annual cost for all respondents is \$126,187. [Social and Community Service Managers \(bls.gov\)](https://www.bls.gov)

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

There are no direct monetary costs 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 \$46 per hour for four federal employees (grades 12-14). This wage rate comes from the Bureau of Labor Statistics (https://www.bls.gov/oes/current/oes_nat.htm). These federal employees distribute, tabulate, and analyze the data on the OCSE-75 forms (an average of 4 hours spent on each form). Cost breakdown are as follows: 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. Four federal employees multiplied by 1 hours, multiplied by \$46 per hour, multiplied by 60 (FY 2022), responses and 61 (FY 2023), and 61 (FY 2024) added together and divided by three equals an average total cost to the federal government of \$33,488. The average wage rate of \$46 per hour for federal level employees who review submitted annual data reports comes

Regional Program Manager	Management Analyst (13-1111)	\$46.91/hour
Program Specialist	Misc. Social Scientist (19-3090)	\$43.63/hour
Management Analyst	Management Analyst (13-1111)	\$46.91/hour
Grants Officer	Financial Analyst, All Other (13-2098)	<u>\$46.46/hour</u>

Average Wage Rate **\$45.98 or \$46/hour**

FY 2022 = \$46 x 60 = \$2760 x 4 hours = \$11,040
 FY 2023 = \$46 x 61 = \$2806 x 4 hours = \$11,224
 FY 2024 = \$46 x 61 = \$2806 x 4 hours = \$11,224

Average cost to federal government: **\$33,488**

15. Explanation for Program Changes or Adjustments

This request is to extend approval with revisions. Revisions were based on feedback received through a workgroup, as describe in section A8. Edits to the form include:

- the addition of reporting the total number of tribal cases open during the fiscal year

- eliminating the reporting of children ever needing paternity established and instead reporting the number of children in open cases
- adjusting the reporting of children with paternity concluded to be at any time rather than during the fiscal year
- eliminating the tribal jobless rate reporting
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Revisions will go into effect for FY23 reporting. This request extends use of the FY22 form for use this reporting year.

16. Plans for Tabulation and Publication and Project Time Schedule

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

OCSE plans to continue to use the current OCSE-75 form for FY 2022 and use the new form starting FY 2023. This will allow the tribal child support programs time to adjust their computer programs to accommodate the new data.

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

The OCSE-75 form will display the expiration date.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification statement.