Tribal Budget and Narrative Justification Template

OMB Information Collection Request 0970 - 0548

Supporting Statement Part A - Justification

April 2023; Updated June 2023

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

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 helps to improve efficiency and establish uniformity and consistency in the annual budget preparation, submission, and review processes. Tribes use the Excel or Word version of the template to prepare and submit the required financial information.

In April 2023, the Office of Child Support Services (OCSS) submitted a request to continue to collect data using a previously approved financial reporting form, Tribal Budget and Justification Narrative Template. This request to extend approval with no changes to the template was approved in May 2023. At the time of submission, OCSS was named the Office of Child Support Enforcement (OCSE). On June 5, 2023, the Administration for Children and Families published a notice in the *Federal Register* (see 88 FR 36587) to announce the change in name from the Office of Child Support Enforcement to the Office of Child Support Services. This nonsubstantive change request updates this document to reflect this change.

2. Purpose and Use of the Information Collection

The Tribal Budget and Narrative Justification Template is an optional form tribes may use to prepare and submit their budget and justification narrative according to the tribal child support regulations. The form is available in two formats, Excel and Word, for the tribes' convenience and is used by OCSS to review the annual budget applications. The information requested in these templates is the basis for the tribe's annual grant award.

3. Use of Improved Information Technology and Burden Reduction

These optional templates help to improve efficiency; establish uniformity and consistency in the budget preparation, submission, and review processes; and reduce errors and OCSS 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.

4. 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. The intent of this tool is to improve efficiency for the tribe in preparing and submitting the required annual budget application.

5. Impact on Small Businesses or Other Small Entities

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

6. 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.

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

The collection of information does not involve any 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 January 23, 2023, Volume 88, Number 14, page 3995, and provided a 60-day period for public comment. We did not receive comments.

9. Explanation of Any Payment or Gift to Respondents

No payment or gift is provided to respondents.

10. Assurance of Confidentiality Provided to Respondents

The information collected does not require assurances of confidentiality.

11. Justification for Sensitive Questions

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

12. Estimates of Annualized Burden Hours and Costs

Estimated Annualized Burden Hours for Respondents

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 respondents include 60 tribes or tribal organizations submitting the optional Excel or Word templates.

Based on submissions over the past three years, we estimate that 52 entities will submit an Excel file and 8 will submit a Word file. The combined total annual burden of this collection is 992 hours.

Estimated Annualized Costs to Respondents

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 2021, which is \$36.92 per hour (mean). To account for fringe benefits and overhead, the rate was multiplied by two, which is \$73.84. The estimate of the annualized cost to respondents for hour burden is \$73.84 multiplied by 992 hours, or \$73,249.

May 2021 National Occupational Employment and Wage Estimates (bls.gov)

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	52	1	16	832	\$73.84	\$61,435
Tribal Budget and Narrative Justification – Word	8	1	20	160	\$73.84	\$11,814
Estimated Annual Burden Total:			992	Estimated Annual Cost Total:	\$73,249	

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

There are no other costs to respondents and record keepers.

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 \$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: <u>May 2021 National Occupational Employment and Wage Estimates (bls.gov)</u>

Regional Program Manager	Management Analyst (13-1111)	\$44.71/hour
Regional Program Specialist	Misc Social Scientist (19-3090)	\$39.61/hour
Tribal Program Specialist	Misc Social Scientist (19-3090)	\$39.61/hour
IT Specialist	Computer Systems Analyst (15-1211)	\$47.73/hour

Average Wage Rate (44.71+39.61+39.61+47.73+39.14)/5 = \$42.16 or \$42.00/hour

15. Explanation for Program Changes or Adjustments

There are no changes to this information collection since the last OMB approval. The number of respondents to each mode of submission has been updated based on experiences to date and expectations over the next three years. This adjustment has reduced the overall burden estimate.

16. 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.

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.