

THE SUPPORTING STATEMENT

The Office of Management and Budget (OMB) requires that for approval under the Paperwork Reduction Act a Supporting Statement must be prepared in the format specified below. Information in the Supporting Statement should be provided in a manner that is responsive to the OMB instructions, and each item must be identified using the numbering system given by OMB. If the Supporting Statement exceeds 10 single-spaced pages in length, there should be a summary not exceeding one page in length which precedes it.

Every effort should be made to keep the Supporting Statement to a length of 10-12 pages. When possible, detailed information should be placed in an attachment, which is then referenced in an appropriate place in the Supporting Statement so that interested reviewers can peruse it. Each attachment should be referenced in the text, so that a reviewer knows why it has been included and which portions may be of particular interest. Brevity and clarity with respect to both the text of the Supporting Statement and any attachments are highly desirable; only the information requested by the OMB outline and needed to understand the project should be included.

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must be entered in worksheet I. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

- A. Justification. Requests for approval shall:**
 - 1. Circumstances Making the collection of Information Necessary**

The Deficit Reduction Act of 2005 (P.L.109-171) (DRA) amended section 438 of the Social Security Act to authorize two new Court Improvement Program (CIP) grants (42 USC 629h). The new grants include: (1) a grant for data collection and analysis, to help ensure that foster children's needs for safety, permanency and well-being are met in a timely and complete manner (the data collection and analysis grant), and (2) a grant for training judges, attorneys and other legal personnel in child welfare cases and conducting cross-training with child welfare agency staff and contractors (the training grant). The new grants are authorized for \$10 million each for Federal fiscal years 2006 through 2010.

Section 438 of the Social Security Act grants the Secretary authority to require certain information and assurances from the highest State court as part of an application for CIP funds. 45 CFR Part 92 Subpart C specifies requirements for the annual program and financial reports. The financial report is submitted on Standard Form 269, which has been approved by OMB No. 0348-0039.

This Program Instruction provides instructions for State courts applying for new CIP funds for Fiscal Years (FYs) 2006-2010. Instructions are provided for the annual application and the annual program and financial reports required for these two new grants. A copy of the statute is attached. There are no regulations for the Court Improvement Program.

2. Purpose and Use of the Information Collection

All of the information submitted is used by the Administration for Children and Families (ACF): (1) to ensure compliance with the statute, and (2) as the basis for determining training and technical assistance needs of the grantees.

Applications submitted in FYs 2006 and 2007 were used by ACF as the basis for making Fiscal Years 2006 and 2007 grant awards. ACF analyzes the State annual reports to ensure compliance with the statute and determine training and

technical assistance needs.

3. Use of Improved Information Technology and Burden Reduction

State courts must submit applications and reports to the appropriate ACF Regional Office via e-mail or compact disk. Applications and reports must be submitted electronically; hard copies only will not be accepted by ACF Regional Office staff.

4. Efforts to Identify Duplication and Use of Similar Information

No other data source collects similar information.

5. Impact on Small Businesses or Other Small Entities

Only the highest court in each State is eligible to submit an application for this grant award. The information required is the absolute minimum necessary for meeting the statutory requirements and providing the information on which the grant award decisions are based.

6. Consequences of Collecting the Information Less Frequently

The application and the annual program and financial reports are each one-time per year requirements. Without the prescribed application, as required by the statute, and the program and financial reports, ACF will be unable to adequately monitor a court's activities to determine that funds are being spent for the purposes for which they were awarded. Annual collection permits the Department to minimally meet its stewardship obligations without overburdening the grantees.

7. Special Circumstances Relating to the Guidelines of 5 CFR

1320.5

There are no special circumstances required in the collection of this information.

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

A Federal Register Notice was published which solicited comments to ACF under the Paperwork Reduction Act on November 6, 2007, Volume 72, No. 214, page 62653. An identical Federal Register Notice was published on January 28, 2008, Volume 73, No. 18, page 4872. No comments were received on either Notice.

The Children's Bureau maintains ongoing consultation with the State courts receiving the CIP grants primarily through its regional offices, training and technical assistance provided by the National Child Welfare Resource Center on Legal and Judicial Issues, an active CIP listserve, and an annual national meeting.

In December 2007 the Children's Bureau convened a record number of 316 representatives of State CIP for a full day of plenary presentations, workshops and round tables focused primarily on implementation of strategic plans and improving collaboration between courts and child welfare agencies. This annual meeting was held in conjunction with the Children's Bureau Conference for Agencies and Courts, the first day of which was dedicated to court and agency collaboration and attended by a large number of the CIP representatives.

9. Explanation of Any Payment or Gift to Respondents

No payments, other than a one-time grant award per application, will be made to States.

10. Assurance of Confidentiality Provided to Respondents

Information in the applications and reports is not confidential.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature in the application or report requirements.

12. Estimates of Annualized Burden Hours and Costs

The information collection burden hours for each grant listed below are only estimates. The CIP applications and reports will be submitted on an annual grant award basis. The hours per response are based on an average amount of time needed by the States for consultation, coordination, collection of baseline information, and for developing and submitting the required applications. The application is the basis for States to receive funding under Section 438 of the Social Security Act.

The annual financial reports and the program reports will be submitted 90 days after the end of the program period. These reports will provide compliance information, indicate progress with meeting program goals and objectives, and pinpoint technical assistance needs.

The estimated information collection burden hours required to complete the application and the annual program report are based on the assumption that all States will receive awards for both grants under this authority. Cost and respondent time are based on experience with prior similar activities and information obtained from potential respondents.

Annual Burden Estimates

INSTRUMENT PER	NUMBER OF HOURS PER	NUMBER OF RESPONDENTS BURDEN	NUMBER OF RESPONDENT	AVERAGE RESPONSE	TOTAL ANNUAL HOURS
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APPLICATION	52	2	40	4160
ANNUAL PROGRAM REPORT	52	2	36	3744

Estimated Total Annual Burden Hours: 7,904

We estimate that it will take approximately 40 hours for each applicant to complete each one of these applications and approximately 36 hours to complete the annual program report for each grant. We estimate the average hourly wage for staff developing the applications and reports @ \$30/hour. We estimate the total annual cost of both CIP grants to be \$237,120.

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

There is no cost burden associated with the ICR.

14. Annualized Cost to the Federal Government

There are no additional Federal costs as a result of this information collection

15. Explanation of Program Changes or Adjustments

The approach toward computing costs was revised to more accurately reflect incremental dollar outlays.

16. Plans for Tabulation and Publication and Project Time Schedule

The Department does not plan to publish the information collected.

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

The Department displayed the expiration date on the Program Instruction.

18. Exceptions to Certification for Paperwork Reduction Act Submission

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When item 16 is checked "Yes," the following documentation should be included in the supporting statement to the extent that it applies to the methods proposed:

1. Describe (including numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

2. Describe the procedures for the collection of information including:
 - . Statistical methodology for stratification and sample selection,

- Estimation procedure,
- Degree of accuracy needed for the purpose described in the justification,
- Unusual problems requiring specialized sampling procedures, and
- Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

3. Describe methods to maximize response rates and to deal with issues of nonresponse. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

4. Describe any tests of procedures or methods to be undertaken.

Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for collection of identical information from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

