

Supporting Statement for the State Plan for Child Support Collection and Establishment of Paternity under Title IV-D of the Social Security Act

A. Justification

1. Information Collection

The requirement for submission of a State plan and plan amendments for the Child Support Enforcement program is found in legislation at sections 452, 454 and 466 of the Social Security Act. These sections are implemented by regulations at 45 CFR 301, 302, 303, 305, 307 and 308 (see especially 45 CFR 301.10-301.13 in Attachment I). States and Territories are provided with instructions for completing the State plan and plan amendments in OCSE-AT-00-10 (Attachment II).

OCSE has approved a IV-D State plan for each State and Territory. Attachment III includes the current State plan table of contents and a transmittal form, which States and Territories send in with each State plan amendment. Federal regulations require States and Territories to amend their State plans only when necessary to reflect new or revised Federal statutes or regulations or material change in any state law, organization, policy or IV-D agency operations. OMB approved the IV-D State plan Form OCSE-100. As a result of the Child Support Enforcement Amendments of 1984 (P.L. 98-378), the Omnibus Budget Reconciliation Act of 1987 (P.L. 100-203), the Family Support Act of 1988 (P.L. 100-485), the Omnibus Budget Reconciliation Act of 1993 (P.L. 103-66), the Social Security Act Amendments of 1994, the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (P.L. 104-193, PRWORA), the Technical Amendments to PRWORA (P.L. 105-33), Child Support Performance and Incentive act of 1998 (CSPIA) (P.L. 105-200), and related regulations, OCSE also received OMB approval for new and revised state plan pages.

We request approval of an extension of a currently approved collection.

According to 45 CFR 301.13, "After approval of the original plan by the Office, all relevant changes, required by new statutes, rules, regulations, interpretations, and court decisions, are required to be submitted currently so that the Office may determine whether the plan continues to meet Federal requirements and policies." States and Territories submit, on average, six State plan preprint pages and six transmittals annually to notify OCSE of relevant changes required by new state statutes, rules, interpretations and court decisions. Due to passage of the Deficit Reduction Act of 2005 (P.L. 109 -171, DRA), States and Territories will be required to resubmit two state plan preprint pages and two transmittals annually to notify OCSE of relevant requirements. In summary, States and Territories must submit eight transmittal pages and eight state plan preprint pages.

2. Use of Information

The information collected on the State plan pages is necessary to enable OCSE to determine whether each State and Territory has a IV-D State plan that meets the requirements in title IV-D of the Social Security Act and implementing regulations. The State plan preprint gives

each state a convenient method for developing a statement to be submitted to OCSE for approval describing the nature and scope of its program and giving assurances that the program will be administered in conformity with the requirements in Title IV-D of the Act and the implementing regulations at 45 CFR Chapter III. The State plan is analogous to a State having a contract with OCSE in that it outlines the activities the State will perform as required by law in consideration for receiving Federal funds to meet the costs of these activities. In this sense, the State plan is the basis for making Federal funding available to the States in the costs of operating the Child Support Enforcement program.

3. Burden Reduction

The collection of information does not involve the use of automated, electronic, mechanical or other technical collection techniques or other forms of information technology.

4. Duplication Identification

The collection of information requirements contained in this form does not duplicate any other reporting or recordkeeping requirements.

5. Small Business Burden

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

6. Frequency of Information Collection

States and Territories will, for the most part, submit State plan preprint pages to OCSE on a one-time only basis to reflect new Federal requirements. In addition, States and Territories will periodically amend their State plans to reflect any material change in state laws, organization, policy, or IV-D agency operation.

7. Special Circumstances

The collection of information does not involve any special circumstances.

8. Federal Register Notice

The first notice in the Federal Register, required by 5 CFR 1320.8(d), soliciting comments on the information collection, was issued in the Federal Register on June 5, 2007 (Volume 72, Page 31071).

9. Payment or Gift to Respondents

No payment or gift is provided to respondents, other than remuneration of contractors or grantees.

10. Confidentiality

We do not assure confidentiality of the information collected.

11. Sensitive Nature

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

12. Respondents' Hour Burden

The estimate of burden to respondents is based on the following assumptions:

- The 54 respondents include all State and Territories participating in the Child Support Enforcement program: the 50 States, the District of Columbia, Guam, Puerto Rico and the U.S. Virgin Islands.
- OCSE obtained information from Regional offices regarding information about the number of state plan preprint pages that are submitted each year from each State and Territory (six).
- Due to passage of the Deficit Reduction Act of 2005 (P.L. 109 -171, DRA), States and Territories will be required to resubmit two State plan preprint pages and two transmittals annually to notify OCSE of relevant requirements.
- In summary, States and Territories must submit eight state plan preprint pages annually.
- A state plan transmittal (OCSE-21-U4) will be submitted with each state plan preprint page.
- Regional offices were polled to gain information about the amount of time required to complete and transmit the required information.

Instrument	Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours
State Plan (OCSE-100)	54	8	.5 hours	216 hours
State Plan Transmittal (OCSE-21-U4)	54	8	.25 hours	108 hours
Total			.75	324 hours

12.1 Respondents' Cost for Hour Burden

The estimate of costs to respondents is based on the following assumptions:

- Regional offices were polled to gain information about the average salary of an employee who would be working on this State plan (\$18 per hour).

- The cost to respondents cumulatively is 34% of the total cost. This is due to the Federal financial participation aspect of the Child Support Enforcement system, whereas the Federal government reimburses states for 66% of total child support administrative costs.

Instrument	Annual Cost Burden	Cost per Response	Respondents Cumulative Share of Cost (34%)	Average Annualized Share of Cost Per Respondent
State Plan (OCSE-100)	\$3,888	\$9.00	\$1,321.92	\$24.48
State Plan Transmittal (OCSE-21-U4)	\$1,944	\$4.50	\$ 660.96	\$12.24
Total	\$5,832		\$1,982.88	\$36.72

13. Annual Costs to Respondents

There are no additional direct 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 \$23 per hour for Federal level employees who review submitted State plan pages from respondents. Estimates regarding the hours spent processing each State plan submission (0.5 hours for State Plan and 0.25 hours for State Plan Transmittal) were determined by past employees' experiences in reviewing State plan pages in OCSE.

Instrument	OCSE's Administrative Costs	Respondent Reimbursement Cost (66% of Total Annualized Cost)	Administrative Cost Plus Respondent Reimbursement Cost
State Plan (OCSE-100)	\$4,968.00	\$2,566.08	\$7,534.08
State Plan Transmittal (OCSE-21-U4)	\$2,484.00	\$1,283.04	\$3,767.04
Total	\$7,452.00	\$3,849.12	\$11,301.12

15. Change in Burden

The change in burden hours is due to a new statute (Deficit Reduction Act of 2005). For this reason, we revised previous estimates regarding the number of state plan preprint pages submitted annually.

16. Publication

Not applicable

17. Display of Expiration Date – See Attachments

18. Exception to the “Certification for Paperwork Reduction Act Submission”

There are no exceptions to the certification statement.

SUPPORTING STATEMENT:

PART B- COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

The information collection requirements outlined in this report do not employ the use of statistical methods.