

**SUPPORTING STATEMENT**  
Request for Clearance of Information Collection and  
Approval of Proposed Revisions to the  
**“Grants to States for Access and Visitation:  
State Child Access Program Survey” -- OMB #0970-0204**

**JUSTIFICATION**

**1. Circumstances Making Collection Necessary**

The *State Child Access Program Survey (Survey)*, used by the Office of Child Support Enforcement (OCSE) to collect fiscal year program data from State and local grantees, expires June 30, 2009.

We are requesting OMB approval of the revised Survey for use beginning October 1, 2009 (FY 2010). This would allow grantees to collect FY 2009 program data using the current form and, in addition, enable OCSE to provide training to States/local grantees on changes made to the proposed revised survey before they use it in FY 2010. OCSE will be submitting, under separate cover, a request to extend the current survey from June 30, 2009 to September 30, 2009.

OCSE published a 60-day notice in the Federal Register on March 25, 2008, and received one written response. The second federal register notice was republished 10/27/2008.

**Background**

The Survey enables OCSE to comply with Federal law Section 469B(e)(3) of the Social Security Act (Pub.L.104-193), which requires that each State receiving an Access and Visitation (AV) Grant shall monitor, evaluate and report on such programs in accordance with regulations. Data reporting requirements were published in the Federal Register (64 FR 15132) on March 30, 1999. States are required to report this information annually in such form as the Secretary may require.

**Proposed Revisions to the Survey**

OCSE has used the current form for nearly six years. We believe we can improve the data collected with negligible impact on the States and local grantees. The proposed revised Survey maintains the current format, streamlines the data collection (particularly for the local service providers), and instructs the States to compile the data in program categories that will be of use to both OCSE and States in assessing AV program effectiveness.

**Highlights of Proposed Changes**

**Improving the State Agency Section of the Survey:** The narrative sections added to Part I: are:

- D. Description of State Child Access Program (pg. 7);
- E. Accomplishment of Program Goals (pg. 7);
- F. Summary Description of State’s Estimated Program Costs Compared to Actual Expenses (pg. 8); and

H. Summary Table: State AV Program Data (pg. 9-10).

**Data Elements:** (changes and/or additions in both the State and Local Service Provider data worksheets):

- **Referral Source** would add Domestic Violence and Child Protection agencies that we learned through experience may serve or refer clients to AV services. We replaced statutory title “IV-D” with the program name, Child Support, for clarity.
- **Client Information** would distinguish mothers and fathers in terms of their parental status (custodial or noncustodial). This will enable OCSE to assess the extent to which noncustodial fathers and noncustodial mothers are recipients of AV services.
- **Client Participation in Services** would incorporate “monitored” visitation under “supervised visitation” as a logical category to include monitored, therapeutic, and supervised visitation.
- **Visitation Enforcement** is new, and allowed by statute as a service overlooked by the States as separate from supervised visitation and neutral drop-off and pick-up.
- **Development of Guidelines for Visitation and Alternative Custody Arrangements** is a valid State-only activity and needs to be dropped from the Local Service Provider spreadsheet.
- **Increased Parenting Time**, our chief outcome measure, would now importantly distinguish between noncustodial mothers and noncustodial fathers

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

OCSE analyzes State Survey data and compiles it in an annual report, *Child Access and Visitation Grants: State Profiles*, which serves OCSE as a valuable program management tool. The report also includes a national trend analysis and overview for each of the individual State AV Program.

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

OCSE developed the Survey in electronic format. State and local grantees have the option of submitting the survey to OCSE electronically or in hard copy.

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

The Survey is the only source for obtaining data on the AV.

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

Not applicable.

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

We would violate Federal law and regulations if the data were not collected annually. OCSE needs the data each year to satisfy its oversight responsibility.

**7. Special Circumstances Relating to the Guidelines of 5CFR1320.5**

Not applicable.

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

Notice of OCSE’s intent to revise the Survey was published in the Federal Register on March 25, 2008 and received comments from the State of Texas, Office of the Attorney General, the agency that administers the AV Program. Prior to this notice, OCSE consulted with and solicited recommendations from State AV Program Coordinators regarding options for improving the Survey.

**Comment #1: Summary Description of State’s Estimated Program Costs versus Actual Expenses—Part I: State Agency Program Survey**

Texas believes that adding this reporting requirement would significantly increase staff time to complete the Survey. Instead, Texas recommends a brief explanation of any changes in program costs as a whole (not by service category) and administrative costs as a whole versus estimated program costs.

**OCSE Response:**

According to 2 CFR Part 215 and OMB Circular A-102, OCSE is required to obtain detailed grantee end-of-year performance reports to enable comparison of actual accomplishments to proposed objectives.

To meet the administrative requirements for annual reporting, States must break down budget categories by services and/or expense. This is necessary to determine if States are budgeting unallowable or unreasonable amounts in certain categories and/or are exceeding their own indirect cost rates for administration expenses. It is also necessary to determine if States met their objectives using the budget categories initially submitted.

**Comment #2: Service Category included on both State Agency and Local Service Provider worksheets**

Texas objects to the wording of a new data element “**Visitation Compliance Monitoring.**” It is their position that the wording should be “Visitation Enforcement” which reflects the wording contained in the enabling legislation.

**OCSE Response:**

The revised Survey says “Visitation Enforcement.” We suspect the State referenced an earlier Survey draft used in our discussions with the States prior to the Federal Register notice on March 25, 2008.

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

Not applicable.

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

Not applicable.

**11. Justification for Sensitive Questions**

Not applicable.

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

No. of Respondents	No. of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
54 States/jurisdictions	1	15	810
260 Local service grantees	1	15	3,900
Total: 310	1	15	4,710

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

No foreseen additional costs.

**14. Annualized Cost to the Federal Government**

The analysis and compilation of survey data will be conducted by one OCSE staff member @ 35 percent time X annual salary (\$70,000) = \$24,500. There are no additional direct costs.

**15. Explanation of Program Changes or Adjustments**

The burden hours for the proposed revised survey (4,710) are slightly reduced from the burden hours for the current survey (4,860). The additional reporting requirements proposed for Part I: State Program Survey are offset by the reduction and/or streamlining of reporting requirements contained in Part II: Local Service Provider Survey.

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

See item 2 above. The annual report is announced to State AV Coordinators and Child Support Directors via a Dear Colleague Letter and is available on OCSE’s Web site.

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

Not applicable.

**18. Exceptions to Certification for Paperwork Reduction Act Submission**

Not applicable.

**A. Collections of Information Employing Statistical Methods**

Not applicable.