



received 6/4/08

ATTORNEY GENERAL OF TEXAS

GREG ABBOTT

CHILD SUPPORT DIVISION

May 22, 2008

Administration for Children and Families  
Office of Administration  
Office of Information Services  
370 L'Enfant Promenade, SW.  
Washington, D.C. 20447

Dear Clearance Officer:

The following comments by the Texas Title IV-D program are in response to the notice of proposed information collection activity related to Grants to States for Access and Visitation: State Access Program Survey, published in the Federal Register, Volume 73, Number 58, March 25, 2008.

The proposed changes to Part I State Agency Program Survey, Part II Local Service Provider Survey, State AV Survey Spreadsheet, and Local AV Survey Spreadsheet replaces the term "Visitation Enforcement" with "Visitation Compliance Monitoring" as an allowable service. We do not agree with this alteration because 42 U.S.C. 669b specifically authorizes visitation enforcement activities. We support the inclusion of "Visitation Compliance Monitoring" as subordinate to "Visitation Enforcement", but completely removing the latter places limits on the activities funded by the grant and is in conflict with the authorizing statute.

The proposed addition of Part I State Agency Program Survey, section F, "Summary Description of State's Estimated Program Costs versus Actual Expenses" would significantly increase our reporting time. Breaking down service categories and administrative costs and comparing those with the costs anticipated in the application would substantially increase the time required to break out costs by each category. We recommend 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.

We appreciate the opportunity to comment on the notice of proposed information collection activity and hope that our comments are useful. Please contact me if you have any questions or require additional information.

Sincerely,

Alicia G. Key  
IV-D Director