Supporting Statement

A. **JUSTIFICATION**

1. <u>Circumstances Making the Collection of Information Necessity</u>

The purpose of this request for review is to obtain clearance for the Child Support Supplement to be conducted by the Bureau of the Census, authorized by Title 13, United States Code, Section 182, in conjunction with the April 2010 Current Population Survey (CPS) Attachment A2. This supplement, which was last collected in 2008, will continue the data series started in 1979 in response to a recommendation of the Conference on Issues in Federal Statistical Needs Relating to Women. This supplement is sponsored by the Office of Child Support Enforcement (OCSE) of the U.S. Department of Health and Human Services and is authorized by Title IV-D of the Social Security Act.

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

The Child Support Supplement is designed to obtain information on the characteristics of individuals eligible to receive child support and the types of financial arrangements made to assist in the support of such individuals and any children for whom they retain custody. To enhance the usefulness of these data, these items will be asked in the six rotation groups common to the March CPS sample to permit matching to the demographic and economic data collected in the Annual Social and Economic Supplement. (This is the same procedure used in the April 1979, 1982, 1984, 1986, 1988, 1990, 1992, 1994, 1998, 2000, 2002, 2004, 2006 and 2008 surveys.) The combination of data from these two supplements will yield a detailed socioeconomic picture of these individuals and their families. The importance of these data continues to increase as the number of households maintained by one parent with no spouse present grows. In many cases, child support payments are the major, if not the sole, source of income for these households; failure to receive these payments may be a contributing factor to poverty in this country, particularly in households maintained by women.

The proposed questionnaire is divided into sections that address specific child support issues. The following paragraphs outline the structure of the proposed 2010 questionnaire and discuss the sections of the Social Security Act to which the OCSE must respond. **Refer to Child Support Questionnaire/Items booklet and Interviewer Instructions.**

The universe questions, contained in the first section, determine which children have a parent living elsewhere, and create a roster of these child support-eligible children. It also determines which adults, regardless of gender, are eligible respondents.

Section 1, The Child Support Roster, assembles a roster of all agreements for all child supporteligible children beginning with the agreement covering the youngest child. The questions on the roster make distinctions between legal and other types of agreements within the household and determine which, if any, children are covered by the same agreement. Section 2, History of Most Recent Support Agreement, asks questions of parents who may have informal agreements, as well as those who have court-approved changes to legal agreements.

Section 3A, Support Agreement and Behavior, responds to Section 15 of the Child Support Enforcement Amendments of 1984 to Title IV-D of the Social Security Act, which mandates that each state must set up a commission on child support, whose function is to determine the success in securing child support. The health insurance questions included in this section address Section 16 of the Child Support Enforcement Amendments of 1984 to Title IV-D of the Social Security Act, which requires that the state child support administering enforcement program petition for the inclusion of medical support as part of any child support when reasonable for the absent parent to do so.

Section 3B, Reasons For No Agreement, addresses the reasons the custodial parent may not have a legal agreement or award.

Section 4, Help Getting Support, addresses the requirement that the OCSE measure the extent that child support enforcement activities are employed. In addition, OCSE must measure the type of aid given and the additional amount of child support received in conjunction with such efforts.

Section 5, Agreement About Custody and Visitation, and Section 6, Parent-Child Contact, responds to Section 15 of the Child Support Enforcement Amendments of 1984, where the state commission must also determine parental involvement by focusing on the issues such as the enforcement of interstate obligations and visitation by the absent parent. **Refer to Title IV-D of the Social Security Act.**

Section 7, Family History, collects information about the marital history of the custodial parent. We will ask a few questions about the respondent's most recent marriage only of child support respondents.

Collection of these data will provide a nationwide assessment of the effect of implementation of the above mandates. These data will assist legislators and policymakers in determining how effective their policymaking efforts have been over time in applying the various child support legislation to the overall child support enforcement picture. These items will help policymakers determine to what extent individuals on welfare would be removed from the welfare rolls as a result of more stringent child support enforcement efforts.

With current budget deficits in mind, these questions assist policymakers who are employing more legislative efforts to revert child support responsibilities back to the absent parent, rather than having the custodial parent rely solely upon public assistance for all their child support, health insurance needs, etc.

These data also help measure the effect that the compliance with child support arrangements, or the enforcement or lack of enforcement of child support arrangements, has had on the economic well-being of women and children. These data will assist the OCSE to meet one of

its mandated requirements, which is to measure the effectiveness of child support enforcement efforts.

The OCSE will use these data to measure the extent that its services have been successful in preventing additional application for Temporary Assistance to Needy Families (TANF) payments. Data such as these are also of major interest to policymakers in their efforts to reduce the amount of TANF and other types of welfare payments (such as food stamps and reduced-price school lunches) currently being made. The effectiveness of child support enforcement has a direct bearing on the required level of such payments.

Failure to collect up-to-date data accurately on child support could result in the misapplication of child support enforcement efforts into areas that have little or no return for the resources used. Such actions would not only waste the resources used on such efforts but also would preclude the allocation of resources to more successful enforcement efforts. Such misallocation also would keep TANF and other welfare applicants at their current level instead of making recipients self-sufficient, a primary goal of the child support enforcement effort.

3. <u>Use of Improved Information Technology and Burden Reduction</u>

We deem the use of personal visits and telephone interviews using computer assisted telephone interviewing (CATI) and computer assisted personal interviewing (CAPI), the most appropriate collection methodology given existing available information technology.

4. Efforts to Identify Duplication and Use of Similar Information

The OCSE has consulted with other Government agencies, such as the Census Bureau, and has determined that the April CPS supplement is the only source of current national data that meets the mandated information as described in 2. above. The March Annual Social and Economic Supplement does collect information on receipt of child support, alimony, and TANF; however, it falls well short of obtaining the depth and scope of the information collected by this supplement. In order to avoid duplication of data collection and reduce respondent burden, we only collect this supplement in households that were interviewed in both March and April. The information collected in April is then matched to that obtained in March. The combined computer file maximizes the amount of data available to analysts while minimizing costs and respondent burden.

The Survey of Income and Program Participation (SIPP) collects basically the same data as this supplement; however, data on receipt of child support are collected once a year in a topical module. In addition, the SIPP topical module on child support also includes questions for persons who make support payments that are not asked in the CPS supplement. The SIPP data are currently used to provide base-line estimates for measuring change between demographic events that occur during the survey. The cross-sectional estimates from SIPP on child support are not sufficiently reliable for some analytical applications because of the relative small SIPP sample size. Moreover, there is no other survey that replicates the degree of statistical reliability and depth of child support content associated with the CPS April/March supplement data file.

There is no other current data source available that provides as comprehensive a set of statistics for analysis as described in 2. above.

5. Impact on Small Businesses or Other Small Entities

We designed the supplemental questions to obtain the required information with minimal respondent burden. We developed the proposed items and interviewer procedures over the years as a result of consultation among the Census Bureau, OCSE, and other Government agencies. We ask the supplement questions of individual households, not small businesses or other small entities.

6. Consequences of Collecting the Information Less Frequent

Major emphasis is being given to the child support enforcement effort. The increasing number of single-parent families requires that up-to-date information on such families and their economic situation be available. Less frequent collection of these data would delay analysis and could result in improper allocation of enforcement resources and increased TANF payments.

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

There are no special circumstances.

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

We published a notice of our intent to conduct the Child Support Supplement to CPS in the _ June 9, 2009 (Vol. 74, No. 109, page 27321) edition of the Federal Register.

Comments were received from two respondents regarding the CPS-CSS. Both respondents made comments and suggestions about making changes to the survey questions and format.

One of the responders asked about obtaining state-level data from the survey which is not possible because it is a national survey and only a limited number of individuals are surveyed from each state; such that analyzing state-level data would not yield reliable results due to small sample sizes.

Finally, a responder asked about the time estimate for completion of the survey. The responder was not familiar with the survey procedures and did not understand how the estimated time for completing the survey could range from 1.8 minutes to 3 hours. OCSE has drafted a response to the responder to explain that the time estimates for completion of the survey are based on both the least amount of time it would take to complete the survey if only one question was asked and the greatest amount of time it would take if all questions were asked. So, for example, if a respondent answered "no" to the first question that asks if there is a child in the household under the age of 21 with a parent living outside the house; there would be no need to answer any additional questions because the survey would not be applicable to the household and the census taker would end the interview.

The following persons have been in continuous consultation concerning the development of this supplement:

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In addition to the above, a statement soliciting comments for improving CPS data is predominantly placed in all Census Bureau publications that cite CPS data. We include a similar statement in the technical documentation that accompanies the microdata files. Additionally, we published a notice of our intent to conduct the Child Support Supplement to CPS in the <u>June 9, 2009</u> (Vol. <u>74</u>, No. <u>109</u>, page <u>27321</u>) edition of the Federal Register. Finally, the advance letter (Attachment E) provides respondents with an address at the Census Bureau and at the OMB to which they can submit general comments on the survey, specifically those regarding respondent burden.

9. Explanation of Any Payment or Gift to Respondents

We do not make any payments or provide any gifts to individuals participating in the CPS.

10. Assurance of Confidentiality Provided to Repondents

The Census Bureau will collect the supplement data in compliance with the Privacy Act of 1974 and OMB Circular A-130. Each sample household receives an advance letter approximately 1 week before the start of the initial CPS interview. The letter includes the information required by the Privacy Act of 1974, explains the voluntary nature of the survey, and states the estimated time required for participating in the survey. Field representatives must ask if the respondent received the letter and, if not, provide a copy and allow the respondent sufficient time to read the contents. Also, field representatives now provide households with the pamphlet, How the Census Bureau Keeps Your Information Strictly Confidential. All information given by respondents to Census Bureau employees is held in strict confidence under Title 13, United States Code, Section 9 Each Census Bureau employee has taken an oath to that effect and is subject to a jail penalty and/or substantial fine if he/she discloses any information given to him/her. Refer to the Current Population Survey Advance letter, also refer to the Confidentiality Assurance.

11. Justification for Sensitive Questions

The April Child Support Supplement does not include questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Cost

It is estimated that an average of 1.45 minutes will be required to ask these questions across all 41,300 sample households. Approximately 4,600 sample households containing parents with children whose other parent is not a household member will be eligible for this supplement, resulting in a total of 998 hours of respondent burden. This estimate was based on the time required to answer similar questions in the previous April surveys. The actual interview time is dependent upon the number of eligible parents in the household and their marital and child support status.

12A. Estimated Annualized Burden Hours

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
Survey	41,300	1	1.45	998

Estimated Total Annual Burden Hours: 998

12B. Estimated Annualized Burden Cost

Type OF RESPONDENTS	Total Burden Hours	Hourly Wage Rate	TOTAL Respondent Costs
Non- custodial Parent	1.45	\$10.00	.24

13. <u>Estimate of Other Total Annual Cost Burden to Respondents and Record Keepers</u>

Other than providing their time to answer the questions, the CPS does not impose any cost burden on respondents.

14. Annualized Cost to the Federal Government

The cost to the government of the program to which this collection instrument relates is expected to be \$77 million in fiscal year 2010. The costs are to be borne by the Bureau of the Census, the Bureau of Labor Statistics, and other Government agencies, if involved. The cost of including the April supplement questions is estimated to be \$625,000 in fiscal year 2010 and is borne by the OCSE.

15. Explanation for Program Changes or Adjustments

There are no program changes or adjustments.

16. Plans for Tabulation and Publication and Project Time Schedule

We will conduct the CPS, of which this supplement is a part, during the period of April 18 through 24, 2010. A report based on these data will be published. The expected publication date for this report has not been established yet.

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

We do not wish to display the assigned expiration date of the information collection because the instrument is automated and the respondent, therefore, would never see the date.

18. Exceptions to the Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.

B. Statistical Methods (used for collection of information employing statistical methods)

1. Respondent Universe and Sampling Methods

The April supplement is conducted in conjunction with the CPS for which the universe is 100 million households. From this universe, a sample of approximately 41,300 households is selected each month. In April, from the six rotation groups common to the March CPS sample, there are approximately 4,600 interviewed respondents that represent the sample universe for this supplement. The universe questions (Items 102-108) can be asked of any knowledgeable household respondent, while the detailed child support questions (Items 150-712) must be asked of each parent. The response rate for the April 2008 Child Support and Alimony supplement was 95.7 percent.

2. **Procedures for the Collecting Information**

The questions on child support and alimony comprise a supplemental survey associated with the April 2000 CPS. The statistical properties of these supplemental items will fall within those associated with the CPS itself. **Refer to the Overview of CPS Sample Design and Methodology.**

3. Methods to Maximize Response Rates and Deal with Nonresponse

Response rates and data accuracy for the CPS are maintained at high levels through computer edits, interviewer instruction and training, and close monitoring of these data. **Refer to** paragraph 5 **of the Overview of CPS Sample Design and Methodology.**

Some amount of allocation for item nonresponse is done within the April supplement for eligible persons.

4. Testing of Procedures or Methods to be Undertaken

The CPS is undergoing the latest phases in a series of methodological and questionnaire tests; these are described in paragraph 6 of the **Overview of CPS Sample Design and Methodology.**

5. <u>Individuals Consulted on Statistical Aspects and Individuals Collection and/or Analyzing Data</u>

The following individuals may be contacted on the statistical data collection and analysis operations:

Statistical Design Operations

Patrick Flanagan Demographic Statistical Methods Division Bureau of the Census (301) 763-4290

Statistical Analysis Operations

Charles Nelson Housing and Household Economic Statistics Division Bureau of the Census (301) 763-3183

Statistical Collection/Survey Design Operations

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