

Supporting Statement for Information Collection Requirements Contained in the Proposed Regulations on Computerized Support Enforcement Systems

A. Justification

1. Circumstances making the collection of information necessary

The Child Support Enforcement Program was established under title IV-D of the Social Security Act (the Act) by the Social Services Amendments of 1974, for the purpose of enforcing the support obligations owed by absent parents, establishing paternity and obtaining child support. Because States were not providing adequate IV-D services, Congress enacted the Family Support Act of 1988 to strengthen the program by requiring, among other things, mandatory use of support guidelines, immediate income withholding, increased efforts to establish paternity and mandatory automated systems. In addition, the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) further strengthened the program by requiring, among other things, the establishment of State Case and New Hire Registries and an Expanded Federal Parent Locator Service, mandatory implementation of the Uniform Interstate Family Support Act and expedited administrative procedures, and enhanced automated systems.

The information collection requirements covered by this supporting statement are required as a result of the following sections of the Social Security Act (the Act) as amended by PRWORA.

1.1 General Systems Requirements

Section 454(24) amends the title IV-D State plan to require the State to have in effect an automated data processing and information retrieval system which by October 1, 1997 meets all IV-D requirements enacted on or before the date of enactment of the Family Support Act, and by October 1, 2000 meets all IV-D requirements enacted on or before the date of enactment of PRWORA.

Section 454(16) provides for the establishment and operation by the State agency, in accordance with an initial and annually updated advance automated data processing planning document

approved under section 452(d) of this title, of a statewide automated data processing and information retrieval system. The system must meet the requirements of section 454A and be designed to effectively and efficiently assist management in the administration of the State plan, so as to control, account for, and monitor all the factors in the support enforcement collection and paternity determination process under such plan.

Regulations at 45 CFR 307.5 permit a waiver of statewideness for an Alternative Systems Configuration with additional information that must be submitted with the State's Annual Advance Planning Document. Regulations at 45 CFR 307.15 (b)(10) require States and Territories with high risk system projects to have Independent Validation and Verification reviews.

1.2 Case Registry Requirements

Section 454A(e)(1) requires that States create a State Case Registry (SCR) within their statewide automated child support systems, to include information on IV-D cases and non-IV-D orders established or modified in the State on or after October 1, 1998. Section 454A(e)(5) requires States to regularly update their cases in the SCR.

State IV-D agencies are already required to collect and automate information for their IV-D cases, so there is no incremental burden associated with the collection of IV-D case information. The collection and automation of the required non-IV-D order information, however, is a new burden on the States. For this collection of information, State IV-D agencies will need to make agreements with the courts in their State for submission of non-IV-D order information. See the assumptions listed in item 12 (below) for further information on the burden associated with the collection of non-IV-D information.

Section 454(A)(f)(1) requires States to furnish to the FCR the minimum amount of information on child support cases (including updates to those cases) recorded in the SCR that is necessary to operate the FCR. Minimum information required to register a case on the FCR include: participant first name, participant last name, participant social security number or date of birth and sex, State case number, State FIPS code, case category and case participant type. The minimum information must be present on at least one participant to register the case in the FCR.

States submitted to the FCR an initial transmission of information on IV-D cases established or modified on or before October 1, 1998. States are *not* required to include non-IV-D orders in the initial upload. In all subsequent transmissions to the FCR, however, States are required to submit participant information on non-IV-D orders, in addition to IV-D case information, established or changed on or after October 1, 1998. Copies of the appropriate sections of the statute and the regulations mandating the collection of information are attached to this supporting statement.

2. Purpose and use of the information collection

2.1 General Systems Requirements

The information collection requirements for the development and maintenance of child support enforcement automated systems are addressed in 45 CFR Part 95 and the information collection authority of OMB#0992-0005. However, 45 CFR Part 307 Computerized Support Enforcement Systems includes additional submission requirements on the State child support agencies related to statewide CSE systems. The additional requirements related to enhanced funded system projects are no longer applicable, since OCSE no longer has authority for enhanced funding for systems. The applicable additional requirements for child support systems are related to 1) the waivers under 45 CFR 307.5, 2) system certification requirements under 45 CFR Sections 307.10 and 307.11 and 3) requirements for an independent verification and validation (IV&V) system review under 307.15(b)(10).

Waiver As of June 21, 2007, only one State is subject to additional documentation requirements for its waiver for an Alternative Systems configuration. 42 USC 652 (d)(3). We do not anticipate any additional State seeking a waiver.

System Certification requirements- Initially 54 States, territories and jurisdictions were subject to the documentation requirements related to systems certification. Currently, only two States are still subject to the certification requirements under 45 CFR 307.5. One State has submitted the majority of documentation for a system certification review but is expected to supplement and revise that documentation in the next year. The remaining State began development on August 1, 2007 but will not request system certification until 2011. However, several States are either replacing their systems or making major modifications to their legacy CSE system and they have requested a "certification" review of their new CSE system. We anticipate 4 voluntary system certification reviews in the next 3 years.

IV&V - 45 CFR 307.15(b)(10) requires States and Territories that meet certain triggers are subject to an Independent Validation and Verification review. Five States are currently under IV&V reviews. Two out of the five States because they missed the statutory deadline for system certification and the three others because they are developing new systems to replace their legacy system. We anticipate another 4 states are likely to be subject

to the IV&V requirements over the next three years.

2.2 Case Registry Requirements

The FCR is a pointer system that informs States as to which other State(s) has information on cases or participants of interest to them. The expanded Federal Parent Locator Service (FPLS) is able to automatically provide States with information on address, employment, and unemployment compensation claims data on parents owing child support. The expanded FPLS also alerts States to other States that have registered the same individual. States will be seeking to locate these parents and their employers to either establish or enforce a child support order.

Information regarding individuals is available from the FPLS to certain authorized persons upon request to establish parentage and establish, set the amount of, modify, or enforce child support obligations. Authorized person is defined as:

- * any attorney or agent of the State who has the duty or authority to recover child or spousal support or to seek to enforce orders providing child custody or visitation rights;
- * the court which has the authority to issue an order or to serve as the initiating court in an action to seek an order against a noncustodial parent for the support and maintenance of a child;
- * the resident parent, legal guardian, attorney, or agent of a child.

3. Use of improved information technology and burden reduction

The State may use any available information technology to reduce the burden of the information collection requirements addressed in this document, including reducing the burden of developing and/or updating the APD in accordance with 45 CFR 307.15. In addition, case registry data is transmitted from the States to the FCR electronically.

4. Efforts to identify duplication and use of similar information

The information collection requirements addressed in this

document do not duplicate any other reporting or recordkeeping requirements.

5. Impact on small businesses or other small entities

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

6. Consequences of collecting the information less frequently

6.1 General Systems Requirements

The consequences of not submitting the documentation for a system certification review is a lengthier amount of time spent in the State and county in order for the Federal reviewers to understand the system functionality.

The consequences of not submitting the documentation for a waiver of statewideness, or Alternative Systems Configuration, is that the waiver could not be reviewed or approved. It would also prevent the State from seeking certification of its system under the waiver and the State would face a penalty of 30% of its annual grant or \$204 million annually in the case of California.

The consequences of not submitting the documentation for an IV&V review is potential disapproval of the State or Territories Advance Planning Document which would result in the suspension of funding for its statewide CSE system.

6.2 Case Registry Requirements

The creation and operation of the SCR and the FCR are statutory requirements. In addition, the information collected is vital to efficient and effective child support enforcement across State lines. The transmission of specified data from the SCR to the FCR creates a stable base of operations for all enforcement activities. Sharing up-to-date information is the key to child support enforcement, and without a global database these efforts are extremely time consuming.

7. Special circumstances relating to the guidelines of 5 CFR

1320.5

The collection of the general systems information does not involve special circumstances.

The case registry information collections require respondents to report information more often than quarterly. States are required to send transmissions to the FCR at least weekly. Some States send daily transmissions with their new case and case update data, and others send weekly transmissions (this is dependant on their batch window availability).

8. Comments in response to the Federal Register Notice and efforts to consult outside the agency

The Federal Register notices were published 7/24/2007 and 11/16/2007. An inquiry from Texas related to optional data for Children in the State Case Registry was received and responded to by OCSE. Comments from State staff communicated during teleconferences regarding the burden associated with submitting Independent Validation and Verification reports and Annual Alternative System Configuration updates for States operating under a waiver were received and considered. OCSE modified the General System requirements by acknowledging that these regulatory requirements, implemented in August 21, 1998 did impose higher paperwork burdens upon States operating under waivers or subject to IV&V reviews than was originally estimated in 1998 and thus revised the paperwork burden estimates accordingly.

9. Explanation of any payment or gift to respondents

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

10. Assurance of confidentiality provided to respondents

For the general systems requirements, we do not ensure confidentiality of the information collected
For the case registry requirements, the following assurances of confidentiality exist:

Section 453(l) states: "Information in the Federal Parent Locator Service, and information resulting from comparisons using such information, shall not be used or disclosed except as expressly provided in this section, subject to Section 6103 of the of the Internal Revenue Code of 1986."

Section 453(b) discusses the disclosure of information to authorized persons upon request and states: "... the Secretary shall ... provide through the Federal Parent Locator Service such information to such person, if such information -- (1) is contained in any files or records maintained by the Secretary...; or (2) ... can be obtained by the Secretary ... from another department, agency, or instrumentality of the United States or of any State. No information shall be disclosed to any person if the disclosure ... would contravene the national policy or security interests of the United States or the confidentiality of census data.... No information shall be disclosed to any person if the State has notified the Secretary that the State has reasonable evidence of domestic violence or child abuse and the disclosure of such information could be harmful.... Information received or transmitted ... shall be subject to the safeguard provisions contained in section 454(26)."

Section 454(26) requires each State to "... have in effect safeguards, applicable to all confidential information ... designed to protect the privacy rights of the parties, including - (A) safeguards against unauthorized use or disclosure of information relating to proceedings or actions to establish paternity, or to establish or enforce support; (B) prohibitions against the release of information on the whereabouts of 1 party to another party against whom a protective order ... has been entered; and (C) prohibitions against the release of information on the whereabouts of 1 party to another party if the State has reason to believe that the release of the information may result in physical or emotional harm"

In addition, SCR data will be transmitted over secure and dedicated lines to the FCR.

11. Justification for sensitive questions

The general systems information collections do not involve asking questions of a sensitive nature.

The case registry information collections include the participant's social security number as one of the required data elements. The collection of this information is a statutory requirement.

12. Estimates of Annualized Burden Hours and Costs

ANNUAL BURDEN ESTIMATES

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
307.15 (b) (1) (IV&V)ongoing	2	12	16	384
307.15(b)(1) IV&V semiannual	5	2	16	160
307.5 (b) waiver option	1	1	80	80
307.5(a) (System Certificatio n	1	1	240	240

307.11(e)(1) (ii) Collection of non-IV-D data for SCR States	54	25,200	.046	62,597
Collection of Child Data for IV- D Cases for the SCR: States	54	12,000	.083	53,784
307.11(e)(1) (ii) Collection of non-IV-D data for SCR-courts	3,045	447	.029	39,472
307.11(e)(3) (v) Collection of Child Data for IV- D cases for SCR:Courts	3,045	213	.083	53,833
307.11(f)(1) Case Data Transmitted from SCR to FCR: New cases and case updates	54	52	2.82	7,919
TOTAL				218,469

12.1 General Systems Requirements: Respondents' Hour Burden

The preparation and submission of waiver requests, system certification documentation, and responses to Independent Validation and Verification related to the development and implementation of CSEs (45 CFR 307.5 and 307.15) will impose an estimated total annual burden on the States as follows: 1) For waiver, hours annually 2) for system certification, hours annually and 3) for responses to independent validation and verification, hours annually. The method used to estimate the total annual burden is described in Table 1 below.

Table 1

General Systems Burden Hours

Info. Coll.	Number of Respondents	Responses Per Respondent	Average Number of Responses	Hours Per Response	Annual Burden Hours
307. 5 (waiver)	1	1	1	80	80
307.15 (Certification)	1	1	1	240	240
307.5(b)(10) IV&V Ongoing	2	12	1	16	384
307.5(b)(10)IV&V semi-annual	5	2	1	16	160

12.2 General Systems Requirements: Respondents' Cost for Hour Burden

We estimate that the preparation and submission of an request for a waiver and Alternative systems configuration will have a total annual cost of \$1,600, Method used to estimate total annual costs:

80 hours x \$20.00 per hour = \$1,600 annually

We estimate that the preparation and submission of documentation related to a certification of a CSE system will have a total

annual cost of \$4,800 Method used to estimate total annual costs:

240 hours x \$20.00 per hour = \$4,800 annually.

The estimated total annual cost for the review and response to Independent validation and verification review reports, depends on if the IV&V is ongoing or semi-annual. For the two states who have a requirement of ongoing IV&V, the review and response to IV&V reports would be monthly. For those States who have semi-annual IV&V requirements, the responses would be twice a year.

384 hours x \$20.00 per hour - 7,680

160 hours x \$20.00 per hour - 3,200

The estimates are set forth in Table 2 below.

Table 2

66% Federal Costs and 34% State Costs

Year	Total Cost	66% Federal Costs	34% State Costs
IV&V ongoing	7,680	5,069	2,611
IV&V semi-annual	3,200	2,112	1,088
Certification	4,800	3,168	1,632
Waiver	1,600	1,056	544
Total			\$5,875

The estimated total annual Federal costs for providing technical assistance to States in preparing waiver requests- \$4,000 system certification documentation - \$20,000 and IV&V reports \$8,400. and reviewing these documents is The method used to estimate total annual costs is set forth in Table 3 below.

Table 3

Federal Costs for General Systems Requirements

Year	Waiver	Hours Per waiver	Total Hours	Hourly Rate	Costs
Annual	1	80	80	50	\$4,000
Year	Certification	Hours Per certification 400	Total Hours 400	Hourly Rate 50	Costs 20,000
	IV&V ongoing 2	Hours per IV&V 24	48	50	2,400
	IV&V semiannually 5	Hours per IV&V 24	120	50	6,000

Annual					32,400
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12.3 Case Registry Requirements: Respondents' Hour Burden

a) The collection of non-IV-D order data for the SCR will impose an estimated total annual burden on the States of 62,597 hours annually. Method used to estimate total annual burden is described in Table 4 below.

b) The collection of child data for IV-D cases for the SCR will impose an estimated total annual burden on States of 53,784 hours annually. Method used to estimate total annual burden is described in Table 4 below.

c) The collection of non-IV-D order data for the SCR will impose an estimated total annual burden on the courts of 39,472 hours annually. Method used to estimate total annual burden is described in Table 4 below.

d) The collection of child data for non-IV-D cases for the SCR will impose an estimated total annual burden on the courts of 53,833 annually. Method used to estimate total annual burden is described in Table 4 below.

e) The regular transmission of new cases and case updates from the SCR to the FCR will impose an estimated total annual burden of 7,919 hours annually. Method used to estimate total annual burden is described in Table 4 below.

The estimates of burden and costs to respondents are based on the following facts and assumptions:

* All 50 States, as well as the District of Columbia, Guam, the Virgin Islands, and Puerto Rico are required to report to the FCR.

The initial load has been completed when the Federal Case Registry was operational on October 1, 1998. The ongoing burden is limited to States which are required to periodically transmit new case data and case update data.

* Based on recent transmissions, it is estimated that there will be 2,592,000 new cases per year nationwide, or 48,000 new cases per year per State.

* Approximately half of all child support cases are IV-D cases and half are non-IV-D orders.

* Based on recent transmissions, it is estimated that 5% of all cases in the SCR will be updated per month. Based on the above estimates, there will be approximately 4,000 new cases per month

per State. In addition to the new cases, there will be an estimated 33,951 active cases per month per State, based on the initial upload estimate. Thus, there will be a total of 37,951 cases per month per State. Based on the 5% case update estimate, therefore, there will be approximately 1,898 case updates per month. This means that, on average, each State will send approximately 475 case updates per weekly transmission.

* States have been sending an entire record replacement, rather than a field replacement, for their case updates.

* States are required to send transmissions to the FCR at least weekly. Some States send daily transmissions with their new case and case update data. Others send weekly transmissions, depending on their batch window availability (i.e., period of time where the mainframe is available for processing batch jobs). For the purposes of estimating the respondents' burden, it is assumed that States will continue to primarily send weekly transmissions, as this is the reporting frequency requirement as stated in the regulation. Regardless of the number of transmissions, however, the burden will remain the same. If a State chooses to send daily transmissions rather than weekly, their processing and transmission time will be decreased proportionally. The burden is dependent on the number of cases and case updates, which are fixed numbers (as stated above).

* The data will be sent from the SCR to the FCR electronically in batch files. The per-response hour burden is significantly reduced by submitting batch files where multiple case data can be sent together.

* The Family Support Act of 1988 mandated the implementation of statewide automated child support enforcement systems. Therefore, the collection of IV-D case information and the operation of a statewide automated child support enforcement system are not considered new burdens on States. The SCR will be a component of the existing automated child support system. The incremental burden on States is associated with the collection of non-IV-D order data, which involves coordination with the courts.

* In order to collect non-IV-D information for inclusion in the SCR, State IV-D agencies will have to work out an agreement with the courts within their States that handle family, juvenile, and/or domestic relations cases. An estimated 3,045 courts fall into this category. This number is based on the number of counties in the United States. Some States have multiple courts within a county and some States will have multiple counties within a circuit or district. In some states, all of the burden will be on the State court. In others, it will be on the county courts. This estimate is most likely a high estimate, but due to

the vast variation among State court structures, it is the best estimate to use for this purpose.

* The burden on courts and IV-D agencies for the collection of non-IV-D information varies greatly among States. In some States, the courts may have their own computer system which could automatically transfer the non-IV-D information to the SCR. Other States may have to rely on paper file transactions, because their courts do not have the capability to electronically transfer the information. In this case, the court clerk would have to mail or fax a non-IV-D order to the State IV-D agency, and someone at the IV-D agency would have to type the information into the SCR.

* Given the above-described range of possible scenarios within the States, about half (50%) of all courts appear to be capable of electronically transmitting the necessary non-IV-D order information to the IV-D agency at the State level. The remaining 50% send the information manually, via fax or mail. In the majority of States, the burden for data entry into the SCR (for those non-IV-D orders which have been mailed or faxed by the courts) falls on the State IV-D agency. The burden on the courts is to locate the order and to electronically transmit the information that is already in their system, or to mail or fax a copy of the order to the IV-D agency.

* There is no added burden on local IV-D agencies. The burden of collecting and automating the non-IV-D order information to comply with Federal requirements will fall onto the State IV-D agency.

* States are required to include data on children, specifically the child's name and social security number, in their transmissions to the FCR beginning no later than October 1, 1999. The "child data" burden tiers in the chart below include the burden estimates of the collection and transmission of data on children.

* For some IV-D cases, the data elements of a child's name and social security number are not currently collected at the State level. While most State child support systems do currently have the capacity to store these data elements (to meet the requirements and recommendations of certification for statewide automated child support systems), the data itself is not always included in the system. It is estimated that States currently collect and automate data on children for 50% of all of their IV-D cases. For the remaining 50%, it is assumed that there will be a 5 minute burden per case for the States to collect the data, particularly the child's social security number, to include in the SCR. In some situations, the social security number will be

located somewhere in the case files, and the burden is simply associated with finding it and inputting it into the SCR. In other cases, States may have to solicit the information from the other participants (i.e., the parent) in the case.

* The same assumptions are true for the collection of child data for non-IV-D child support orders. It is assumed that these data elements are not always collected and/or included in a non-IV-D child support order by the courts. Thus, for approximately 50% of their orders, each court will have an additional burden of researching their files to find the required data on the children involved in the order and/or soliciting the information from the other participants in the case.

* On average, there are two participants for every child support case, excluding children. The average number of children per child support case is two. Thus, the burden of transmission for those cases including data on children will be double that of the transmission for those cases that do not include data on children.

Table 4
Case Registry Burden Hours

Information. Collection.	Number of Respondents	Responses Per Respondent	Average Number of Responses	Hours Per Response	Annual Burden Hours
a) 307.11(e)(1)(ii) [Collection of Non-IV-D Order Data for the SCR: States]	54	25,200 [1]	1,360,800	.046 [2]	62,597
b) Collection of Child Data for IV-D Cases for the SCR: States	54	12,000 cases [3]	648,000	.083 hours (5 minutes) [3]	53,784 hours
c) 307.11(e)(1)(ii) Collection of Non-IV-D Order Data for the SCR: Courts]	3,045	447 [4]	1,361,115	.029 [5]	39,472
d) 307.11(e)(3)(v) [Collection of Child Data for Non-IV-D Cases for the SCR: Courts]	3,045	213 [6]	648,585	.083 [6]	53,833
e) 307.11(f)(1) [Case Data Transmitted from SCR to FCR: Includes New Cases and Case Updates]	54	52 [7]	2,808	2.82	7,919
				TOTAL	218,469

[1] Includes 24,000 new non-IV-D cases per year and 1,200 case updates per year (based on the 5% case update estimate). (For further explanation, see the assumptions listed above regarding new case and case update estimates.)

[2] Given the range of possible scenarios within the States (see assumptions above), about 50% of all courts are capable of electronically transmitting the necessary non-IV-D order information to the IV-D agency at the State level. The remaining 50% will send the information manually, via fax or mail. The burden for data entry into the SCR, for those non-IV-D orders which have been mailed or faxed by the courts, will fall on the State IV-D agency. The total burden is based on an average of 30 seconds for those cases that are submitted to the IV-D agency by the courts electronically, and 5 minutes for those cases in which the IV-D agency must input the data into the system. The resulting average burden is 2.75 minutes.

[3] It is estimated that States currently collect and automate data on children for 50% of all of their IV-D cases. For the remaining 50%, it is assumed that there will be a 5 minute burden per case for the States to collect the data, particularly the child's Social Security number, to include in the SCR. In some situations, the Social Security number will be located somewhere in the case files, and the burden is simply associated with finding it and inputting it into the SCR. In other cases, States may have to solicit the information from the other participants (i.e., the parent) in the case. Each State has approximately 24,000 new IV-D cases per year, so 50% of those cases is equal to 12,000.

[4] Includes 1,296,000 new non-IV-D orders per year and 64,800 updates per year for those non-IV-D orders. The resulting number is 447 per court. (For further explanation, see the assumptions listed above regarding new case and case update estimates.)

[5] This burden is based on an average of 30 seconds for those cases that are submitted to the IV-D agency by the courts electronically, and 3 minutes for those cases that are submitted to the IV-D agency by the courts manually, via fax or mail. The resulting average burden is 1.75 minutes.

[6] The same assumptions are true for the collection of child data for non-IV-D child support orders. It is assumed that these data elements are not always collected and/or included in a non-IV-D child support order by the courts. Thus, for approximately 50% of their orders, each court will have an

additional burden (of 5 minutes) for researching their files to find the required data on the children involved in the order and/or soliciting the information from the other participants in the case. Each court has approximately 426 new non-IV-D orders per year, so 50% of those orders is equal to 213.

[7] States are required to send transmissions to the FCR at least weekly. Based on recent transmissions, it is expected that some States will send daily transmissions with their new case and case update data. Others will send weekly transmissions, depending on their batch window availability (i.e., period of time where the mainframe is available for processing batch jobs). For the purposes of estimating the respondents' burden, it is assumed that States will send weekly transmissions. Regardless of the number of transmissions, however, the burden will remain the same. If a State chooses to send daily transmissions rather than weekly, their processing and transmission time will be decreased proportionally. The burden is dependent on the number of cases and case updates, which are fixed numbers.

12.4 Case Registry Requirements: Respondents' Cost for Hour Burden

The annualized costs to respondents for the hour burdens are based on an average wage rate of \$18 per hour for State level IV-D employees who will be responsible for transmitting data, \$15 per hour for IV-D agency employees who will be responsible for conducting research to locate and/or correct the required data elements and for manually entering data into the SCR, and \$15 per hour for court clerks who will be responsible for conducting research to locate and/or correct the required data elements and for sending data to the IV-D agency.

We estimate that the States' collection of non-IV-D order data for the SCR will have a total annual cost \$938,955 Method used to estimate total annual costs:

62,597 hours x \$15.00 per hour = \$938,955 annually

We estimate that the States' collection of child data for IV-D cases for the SCR will have a total annual cost \$806,760. Method used to estimate total annual costs:

53,784 hours x \$15.00 per hour = \$806,760 annually

We estimate that the courts' collection of non-IV-D order data

for the SCR will have a total annual cost \$592,080 annually.
Method used to estimate total annual costs:

39,472 hours x \$15.00 per hour = \$592,080 annually

We estimate that the courts' collection of child data for non-IV-D orders for the SCR will have a total annual cost \$807,495.
Method used to estimate total annual costs:

53,833 hours x \$15.00 per hour = \$807,495 annually

We estimate that the regular transmission of new cases and case updates from the SCR to the FCR will have a total annual cost of \$71,262. Method used to estimate total annual costs:

7,919 hours x \$18.00 per hour = \$142,542 annually

13. Estimates of other total annual cost burden to respondents and record keepers

The annual cost to the respondents (both States and Courts) is \$3,163,305.

14. Annualized Cost to the Federal Government

Please see item 12 above for an outline of the costs to the Federal government for the general systems requirements. There are no additional direct costs to the Federal government associated with these requirements.

The total cost to the Federal Government for the case registry requirements is estimated to be \$30 million. This includes FCR system development and technical assistance contracting costs, as well as the software and hardware costs incurred by OCSE in association with the FCR.

15. Explanation of program changes or adjustments

The annual cost to the respondents (both States and Courts) is \$3,163,305. This is a \$813,975 increase over the \$2,349,330 previous annual cost.

The new reporting format for the paperwork reduction act submissions helped ACF/OCSE identify a mistake in #14 of the old 83-I form submitted in 2004. In 2004, OCSE mistakenly reported \$233 (in thousands of dollars) when it should have been 2,349 (in thousands of dollars) OCSE inadvertently dropped both the \$10,800 annualized costs associated with general systems requirements of APD and APD update as well as dropped the decimal point when translating the numbers in the supporting statement to the 83-I form.

The increase in the State Case Registry requirements is due to

the submission a new worksheet and category for Non-IV-D child data submitted by the Courts. Although the submission of child data in non-IV-D cases is optional and rare, (because no matching services are provided on non-IV-D cases), the transmission data specifications for both non-IV-D cases and IV-D cases are the same, and OCSE interpretation of the paperwork reduction instructions as requiring inclusion of this category even though reporting of this data element is optional.

The increase in the General systems requirements is due to the inclusion of four new categories of documentation that is child support specific and is not already covered by OMB submission 0992-005. These are: Independent Validation and Verification (IV&V) semi-annual submissions, IV&V ongoing submissions, Waiver requirements associated with an Alternative Systems Configuration and Systems Certification requirements. The two general systems requirements from the previous 2004 submission, Implementation APD and APD updates have been deleted, since all 54 child support jurisdictions have submitted approved IAPD's and the annual updates have been incorporated into the waiver (CA) and certification (SC) paperwork requirements. Therefore, the annualized costs associated with general systems requirements are \$17,280, an increase of \$6,480 over the \$10,800 previous cost submission for general systems requirements.

16. Plans for tabulation and publication and project time schedule

Information contained in the IV-D state plan regarding State plan provisions is published each year in the report to Congress on the Child Support Enforcement program. There is no other planned analysis of publication of the data collected.

17. Reason(s) display of expiration date for OMB approval of the information collection is inappropriate

N/A - these are not forms. However, we plan to post the OMB approval number and expiration date on the OCSE website next to the data transmission specifications for SCR which will address the first 4 categories and the OCSE website section that has technical assistance for IV&V and System Certification.

18. Exceptions to certification for Paperwork Reduction Act submission

None of the eight categories are forms. However, we plan to post the OMB approval number and expiration date on the OCSE website next to the data transmission specifications for SCR which will address the first 4 categories and the OCSE website section that has technical assistance for IV&V and System Certification.