

SUPPORTING STATEMENT

Request for Clearance of Information Collection and Approval of Proposed Revisions to the Grants to States for Access and Visitation: State and Local Child Access Program Survey – OMB #0970-0204

1. Circumstances Making the Collection of Information Necessary

The *State and Local Child Access Program Survey* (Survey) is due to expire April 30, 2012. The Survey is used by the federal Office of Child Support Enforcement (OCSE) as the primary means for adhering to a statutory mandate that requires state and local service agencies -- in receipt of access and visitation (AV) grant funds -- to report program data to OCSE on an annual basis.

We are requesting OMB approval of the revised Survey (see Attachment A) for use beginning October 1, 2012 (FY 2013). This would allow grantees to continue collecting FY 2012 program data using the current form and, in addition, enable OCSE to provide training to states and local grantees on the changes made to the proposed revised survey *prior to* implementation at the beginning of FY 2013. The changes we propose are minor and intended to strengthen the accuracy and credibility of the data submitted to OCSE.

OCSE published a 60-day notice in the Federal Register on August 15, 2011 (see Attachment B) and received written responses from six (6) state agencies and two (2) local service providers (see Attachment C). The second Federal Register notice is expected to be published in April, 2012 -- concurrent with the HHS and OMB clearance process.

Background

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) created the “*Grants to States for Access and Visitation*” program. Funding for the program began in FY 1997 with a capped, annual entitlement of \$10 million. The statutory goal of the program is to provide funds to states that will enable them to provide services for the purpose of increasing noncustodial parent (NCP) access to and visitation with their children. State governors decide which state entity will be responsible for implementing the grant program in addition to determining who will be served, what services will be provided, and whether the services will be statewide or in local jurisdictions. The statute specifies certain activities which may be funded including: voluntary and mandatory mediation, counseling, education, the development of parenting plans, supervised visitation, and the development of guidelines for visitation and alternative custody arrangements. Even though the federal OCSE manages this program, the funding for the AV grant is separate from funding for federal and state administration of the Child Support program.

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 AV grant award 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.

The Survey is divided into two parts: Part I: State Agency Survey; and Part II: Local Service Provider Survey. Each year, states prepare Part I of the Survey – based on data received from

AV-funded local grantees (Part II) – and are instructed to submit this form to OCSE for review and analysis.

2. Purpose and Use of Information Collection

OCSE reviews and analyzes the Survey data submitted by states each year and, after a review and revision of numbers (if errors are found), compiles the information into a report entitled “*Child Access and Visitation Grants: State and Jurisdictional Profiles.*” This report includes information on the AV Grant Program, a national trend analysis, and state-specific data including local provider locations and contacts. The Survey is an invaluable management tool for OCSE in identifying low-performing states and, as a consequence, providing them with needed technical assistance.

3. Use of Improved Information Technology and Burden Reduction

The Survey has been developed in MS Word and Excel formats. States are required to complete the survey form and submit to OCSE electronically. During the time period that this survey is authorized, OCSE plans to adopt a more user-friendly, web-based management information system for states to use in compiling and transmitting the annual AV program survey data.

4. Efforts to Identify Duplication and Use of Similar Information

The Survey is the only source available to or used by OCSE for obtaining the statutorily-required data for the AV grant program.

5. Impact on Small Businesses or Other Small Entities

Not applicable

6. Consequences of Collecting the Information Less Frequently

OCSE needs to collect the data annually in order to fulfill and adhere to the statutory and regulatory mandates governing the AV grant program.

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 Agency

Notice of OCSE's intent to propose minor revisions to the Survey was published in the Federal Register on August 15, 2011. OCSE received comments from six (6) states and two (2) local community based organizations (see Attachment C). Prior to this notice, OCSE consulted with and solicited recommendations from state AV program coordinators regarding options for improving the Survey.

Based on the public comments, OCSE reconsidered its recommended changes and decided to make the proposed data elements **optional** instead of a Survey requirement. In addition, OCSE has decided to leave, as is, the current data element “Marital Status between Biological Parents.” However, OCSE has proposed adding two (2) questions that would enable OCSE to further ensure that data collected by state and local grantees on performance outcomes (e.g., increase in NCP parenting time with children) are based on reasonable measures and that the safety of program participants is considered a priority in the development and implementation of AV services. The 2nd FRN has been updated to reflect OCSE's change in position.

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	16	864
300 estimated local service grantees	1	16	4800
Total: 354	1	16	5664

The total burden hours for the proposed revised Survey have slightly increased from 4,710 in 2009 to 5,664 for the following reasons:

- The average number of local service grantees has slightly increased over the past three years (from 260 to 300).
- An increase of 30 minutes per respondent to compensate for the addition of two narrative questions in the Survey. These narrative questions have been included in both the state and local surveys
- Increase of 30 minutes per local service grantee IF a state elects to collect data under the optional data elements. However, OCSE anticipates that only 25% of states will decide to exercise this option (25% x estimated total local grantees [350] = 87 grantees; estimated 30 minutes per grantee). The time expended on the part of the state to compile the optional data in Part I: State Agency Survey is negligible since they will be drawing the data directly from the Part II: Local Service Provider Survey.

Opportunity Cost: Estimates

- Average hourly cost for state/local respondents: \$30 (i.e., \$30 x 16 hrs. per respondent x 354 state/local grantee respondents = \$16,992). Costs are covered by AV grant funds.
- Additional data elements: two (2) narrative questions for both state and local = \$15 per respondent
- Additional optional data elements: 25% of local grantees only = \$15 per respondent; no cost for states.

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 review, analysis, and compilation of Survey data will be conducted by one OCSE staff member @ 35 percent time x annual salary (\$95,000) = \$33,250. Additional costs may be incurred by

OCSE in the development of a web-based information system whereby state AV program coordinators will be able to submit Survey data on-line.

**15. Explanation of Program Changes or Adjustments
Proposed Revisions to the Survey**

The Survey is divided into two parts: Part I: State Agency Survey; and Part II: Local Service Provider Survey. Each year, states prepare Part I of the Survey – based on data received from AV-funded local grantees (Part II) – and are instructed to submit this form to OCSE for review and analysis.

In the August 15, 2011 federal register notice, OCSE proposed adding the following data elements:

1. Add a new “Frequency of Services” data element that would allow service providers to indicate the number of service visits by parents over time. The current survey only picks up a one-time “head count” of persons served without making the distinction that the same person could be the recipient of the same service over time.
2. Under “Marital Status between Biological Parents”, delete the data element “Married to Each Other” since most married parents using these services would be counted in the “separated” category.
3. Add a new data element to identify whether parents served have a child support case. The benefit of including this data element is that it would provide OCSE – the federal agency that administers the Access and Visitation Grant Program – with information on the extent to which parents in the child support caseload are being connected to access and visitation services.
4. Add an outcome measure appropriate to parenting education and counseling services that might include “increased parent knowledge of effective co-parenting strategies.” Currently, the only outcome the survey measures is an increase in noncustodial parenting time with their children. Supervised visitation, mediation/parenting plans, and neutral drop-off and pick-up services are easier to assess impact and more directly relate to the statutory goal of the grant program (i.e., increasing noncustodial parent access to and visitation with their children). However, parent education and counseling services are difficult ascertain whether or not client participation in these services resulted in actual increased noncustodial parenting time. Therefore OCSE proposes to add a new outcome to more accurately capture the impact of these services.

Based on the public comments received following the first federal register announcement (see Attachment C), OCSE reconsidered the aforementioned proposals and instead of making the new data elements a requirement, OCSE decided to make it *optional* for a state to require local grantees to compile and report such data. OCSE also did not change the current data element “Marital Status between Biological Parents.”

In sum, OCSE is proposing to make **optional** (rather than require) the collection of data under the following categories (as reflected in the attached revised survey – see Attachment B):

- A. Clients with Child Support Cases;

- B. Frequency of Service Hours; and/or
- C. Optional Outcome #2: Number of Parents with Increased Knowledge of Effective Co-Parenting Strategies (for parent education/counseling services only).

These optional data elements have been added to the spread sheets for both the state and local survey forms.

OCSE estimates that 25% of the states might elect to collect information under all of the optional data elements and would entail the time spent by local grantees asking clients for the information and incorporating the data into the survey form (25% x estimated total local grantees [350] = 87 grantees; estimated 30 minutes per grantee). The time expended on the part of the state to compile the optional data in Part I: State Agency Survey is negligible since they will be drawing the data directly from the Part II: Local Service Provider Survey.

However, OCSE has proposed including two (2) questions that would enable the program to further ensure that data collected on performance outcomes (e.g., increase in NCP parenting time with children) are based on reasonable measures and that the safety of program participants is in the forefront of both state and local grantees. The questions are as follows and would require a brief, narrative description rather than the collection of hard data:

D. Measures Used in Determining Successful Program/Client Outcomes

- a. Required Outcome: Number of NCPs Who Gained Increased Parenting Time with Children

Briefly describe the working definition used by the state and/or local grantees in determining a successful client outcome (i.e., number of noncustodial parents who gained increased parenting time with children). Only provide a definition for those service categories funded by or through the state AV grant program.

- Mediation
- Development of parenting plans
- Counseling
- Parent education
- Neutral drop-off/pick-up
- Supervised visitation
- Visitation enforcement
- Others services not included in the above

- b. (Optional Outcome #2) Number of Parents that Gained Increased Knowledge of Effective Co-Parenting Strategies (for parent education and counseling services only)

Should the state decide to utilize this optional program outcome – in lieu of the required Outcome #1 and for *parent education and counseling services only* -- briefly describe the working definition for determining whether parents gained increased knowledge of effective co-parenting strategies for one or both of the following services:

- Parent education

- Counseling

E. Family Violence Safeguards

Briefly describe what steps the state took to ensure the safety of parents and children served through AV-funded services. In addition, did the state require grantees funded through the AV program to adhere to specific Family violence protocols and did the state itself adhere to Family violence protocols if it offers direct services? Describe the protocols. Were these requirements incorporated into state grants and/or contracts with local service providers?

OCSE estimates an additional 30 minutes per state and local grantee respondent to provide brief, narrative answers to the aforementioned questions. These narrative questions have been included in both the state and local surveys.

Last, OCSE had included a new cover page to the survey with blue background and a picture of a couple with a child in an effort to make the survey appear more professional and to emphasize the focus of the AV grant program. There is no additional time burden associated with this change.

The total burden hours for the proposed revised Survey have slightly increased from 4,710 in 2009 to 5,664 for the following reasons:

- The average number of local service grantees has slightly increased over the past three years (from 260 to 300).
- An increase of 30 minutes per respondent to compensate for the addition of two narrative questions in the Survey.
- Increase of 30 minutes per local service grantee IF a state elects to collect data under the optional data elements. However, OCSE anticipates that only 25% of states will decide to exercise this option.

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

OCSE reviews and analyzes the Survey data submitted by states each year and, after a reconciliation of numbers (if errors are found), compiles the information into a report entitled “*Child Access and Visitation Grants: State and Jurisdictional Profiles.*” This report is usually published each year and/or posted on OCSE’s website and sent to State AV Program Coordinators as well as State Child Support Agencies. The report also includes information on the AV Grant Program, a national trend analysis, and state-specific data including local provider locations and contacts. The Survey is an invaluable management tool for OCSE in identifying low-performing states and, as a consequence, providing them with the needed technical assistance.

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**

The Survey is essentially a straight forward reporting of program data and does not employ statistical methods of analyses.

Attachment A: Proposed Revised Survey
Attachment B: August 15, 2011 1st FRN Announcement
Attachment C: Public Comments in Response to 1st FRN Announcement