

THE SUPPORTING STATEMENT

A. Justification. Requests for approval shall:

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must be entered in worksheet I. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. OMB reserves the right to require the submission of additional information with respect to any request for approval.

1. Circumstances making the Collection of Information Necessary

Two collections are necessary for the State Court Improvement Program (CIP) to be properly administered, an application and a year-end program assessment report. Both collections have previously received OMB clearance.

Authorizing legislation makes clear that applications are required in order for State courts to receive CIP funding. A copy of the statute is attached with this submission for review. See attached document marked CIP statute.

2. Purpose and Use of the Information Collection

The application is used for State courts to describe and provide a plan for how funds will be used. Applications are reviewed by the Children's Bureau Regional and Central Offices to ensure that strategic plans meet statutory programmatic requirements and are viable.

At the close of each fiscal year for which a grant is received, State courts are also required to submit a year-end program assessment report. The purpose of this report is to provide evidence that the State has used the funds for the approved purposes and to measure progress toward meeting the objectives and outcomes identified in the application.

3. Use of Improved Information Technology and burden Reduction

Only electronic submissions of the collections are accepted.

4. Efforts to Identify Duplication and use of Similar Information

There is no similar information available.

5. Impact on Small business or Other Small Entities

This collection should not impact small businesses and has been designed to minimize the burden on respondents.

6. Consequences of Collecting the Information less Frequently

Applications are statutorily required. Absent applications awards are not authorized and the program cannot continue to operate. The year-end program assessment report is the primary form of accounting and accountability to ensure funds are being used in compliance with the statute. Program assessment reports are necessary to demonstrate how grant funds have been used.

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

There are no special circumstances associated with this collection.

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

Federal Registry Notice number one (60 day notice) was published on 6/3/11 (Volume 76, Number 107); Page 32213-32214. One public comment was received. The comment voiced

objection to the use of any taxpayer money to fund the program and expressed the belief that the CIP is duplicative of Department of Justice programming. The comment was not instructive as it lacked basis in fact.

A number of efforts were made to consult with individuals outside the agency to develop and solicit input on program requirements. Representatives of all 52 grant recipients participated in focus groups as part of the 2011 Annual CIP Meeting on 5/10/11. The purpose of the focus groups was to solicit direct input from grantees on how to improve the program. Grantee feedback led to many of the changes proposed in the attached PI.

A second, smaller meeting was held on 6/27/11 as a follow-up to the focus groups to discuss additional programmatic changes, including the establishment of data reporting requirements. Draft sections of the attached PI were reviewed. The following individuals attended and provided feedback:

- Rob Shelley, Arizona CIP Director (602)452-3582;
- Debra Alsker-Burke, Idaho CIP Director (208)947-7457;
- Gail Barber, Iowa CIP Director (563) 884-4768;
- Angela Peinado, New Mexico CIP Director (505)827-4729;
- Frank Woods, New York CIP Director (518)238-4351;
- Sandy Moore, Pennsylvania CIP Director (717)795-2000;
- Victoria Weisz, Nebraska CIP Director (402)472-9814;
- Michelle Jensen- Goodwin, Wisconsin CIP Director (608) 266-1557;
- Leila Baum Hopper, Virginia CIP Director (804)786-9546

The below federal contractors were involved in ongoing review of the attached program instruction, both contractors have extensive experience in court evaluation and high degrees of familiarity with the **CIP**:

- Cynthia Samples, Senior Associate, Planning and Learning Technologies (contractor)(703)908-8872
- Melissa Neal, Senior Analyst, Planning and Learning Technologies (contractor) (703)908.8873

The following national experts participated in numerous

conference calls and meetings to discuss and plan program changes. These experts were consulted routinely throughout the process.

- Jennifer Renne, Director of the National Child Welfare Resource Center on Legal and Judicial Issues at the American Bar Association Center on Children and the Law (202)662-1731
- Nancy Miller, Director of Permanency Planning...of the National Council of Juvenile and Family Court Judges (775)784-6012
- Victor E. Flango, Ph.D., Executive Director, Program Resource Development National Center for State Courts (757)259-1823

9. Explanation of Any Payment or gift to Respondents

No payment or gifts of any kind will be provided to respondents.

10. Assurance of Confidentiality Provided to Respondents

No such assurances are required by statute or policy for this program.

11. Justification for Sensitive questions

No questions of a sensitive nature will be asked as a part of the collection.

12. Estimates of Annualized Burden Hours and Costs

The below burden estimates were calculated as a result of consultation with nine current grant recipients. The recipients were selected to reflect regional differences and include a range of funding amounts received. Grantees were asked to estimate the total number of burden hours to complete an application and program assessment report including the following items:

Application components:

1. A budget narrative;
2. A letter from the highest State court requesting; funding for FY 2012, specifying which CIP grants the State wishes to apply for including required assurances;
3. A letter of support from the State agency administering the title IV-B and IV-E programs including required assurances;
4. A description clearly articulating why each individual grant for which the State court is applying is necessary and how the funds specific to each grant will be used to promote the identified objectives;
5. A description of how the State court will implement CQI approaches to use data in identifying needs and desired outcomes and measuring progress toward those outcomes;
6. A description of the collaboration (who and how) that has taken place in preparing the grant application;
7. A list of the members of the statewide multidisciplinary taskforce;
8. A description of how the identified stakeholders will meaningfully collaborate on the activities for which the grant funds will be used;
9. A proposed strategic plan that reflects use of all three grants for at least two years and incorporates identified approaches to ensure continuous quality improvement and includes plans to meet the data reporting requirements(State courts have discretion to plan for up to five years); and
10. Certifications: Anti-Lobbying Certification and Disclosure Form (pursuant to 45 CFR Part 93, an Anti-Lobbying Certification and Disclosure Form must be signed and submitted with the State's CIP application.

Program Assessment components:

1. An accounting of the required elements of the Strategic Plan as detailed in section IV of these instructions, including results of implemented activities;
2. For FY 2012, an analysis of collected and/or available data on timeliness and quality indicators of hearings and legal representation;
3. An explanation of how the data have or will be used to identify, inform, and implement necessary interventions

- and reforms to improve the timeliness and quality of hearings and legal representation;
4. A description of improvements in data collection both in quantity and quality;
 5. Suggestions of how alternative or enhanced data collection (e.g. data mining) may be possible and the creation of action plans towards that end; and
 6. Beginning with FY 2013, data to measure timeliness of hearings and indicators of the quality of hearings and legal representation, including: time to first permanency hearing; time to subsequent permanency hearings; time to filing of termination of parental rights petition; time to termination of parental rights; time to permanent placement.

ANNUAL BURDEN ESTIMATES

Collection	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
Complete Application	52	1	92	4,784
Complete Program Assessment Report	52	1	86	4,472

Estimated Total Annual Burden Hours: 9,256

The annualized cost of the response burden is the product of the average hourly wage (unburdened) for CIP staff times the total burden estimate: \$75/hour x 9,256 hours = \$694,200. This average hourly wage was derived from wage information collected from a sample of funded grantees.

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

There are no dollar burden costs.

14. Annualized Cost to the Federal Government

The estimate of the Federal burden is based on the staff time necessary to receive and review application and reports. Eight hours per application and report x 53 applications = 424 hours. Four hundred and twenty-four hours x \$60.00 /hour \$25,440(estimated salary, operational expenses)

15. Explanation of Program Changes or Adjustments

In order to meet the requirements of The Child and Family Services Improvement and Innovation Act (Public Law 112-34), signed into law on September 30, 2011, the following program changes are being made to streamline and simplify the application and reporting processes for grantees:

- (1) One combined application is now required for all three CIP grants. Previously each of the three grants required a separate application.
- (2) One combined program assessment report is now required for CIP grants.

Previously there were two program instructions governing the CIP a PI for the "basic grant" and a PI for the "new grants", each carrying its own burden hour estimate. The estimated burden hours for the basic grant were 76 hours and the estimate for the new grants was 152 hours. Under the previous set of approved collections the total number of burden hours for States applying for all three grants was 228 hours per State. Cumulatively, with 52 applicants for all three grants (52 x 228) this amounted to 11,856 burden hours.

The current approval for OMB Control No: 0970-0307 was for 7904.0 burden hours. However, that approval was for the "new grants" alone, representing two of the three applications required under previous program instructions.

With the statutorily required change to a single, combined application, the total number of burden hours estimated for

States applying for all three CIP grants is now 178 hours. Cumulatively, with 52 applicants for each grant (52 x 178) this amounts to 9256 burden hours. While this is an increase for the current approval, it is an aggregate decrease for the three applications combined.

This estimate is a net reduction of 50 burden hours per State or 2600 hours overall (11,856 total combined burden hours under the previous approvals less 9256 total burden hours under the new PI).

No adjustments are necessary for the program.

16. Plans for Tabulation and publication and Project Time Schedule

There are no plans for publication.

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

The current control number and expiration date have expired.

18. Exceptions to Certification for Paperwork reduction Act Submissions

There are no exceptions being sought with this submission.

B. Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When item 16 is checked "Yes," the following documentation should be included in the supporting statement to the extent that it applies to the methods proposed:

1. Respondent Universe and Sampling Methods

The respondent universe for this project is all CIP grantees (N=52). Because all CIP grantees will be respondents in this new project, no sampling methods will be employed. The expected response rate for this new project is 100 percent.

2. Procedures for the collection of information including:

This project will not employ any statistical methodology for stratification and sample selection, nor will it use estimation procedures.

3. Methods to Maximize Response Rates and Deal with Nonresponse

CB will offer training and technical assistance to State courts in developing plans for the required data elements. CB will also facilitate periodic review calls with each State to discuss progress toward meeting the stated objectives of the data collection and reporting plans. The FY 2012 application will include a requirement to submit a plan for how data will be collected in applicant States. Year-end annual program assessment reports will also be required to provide an update on plan related progress in FY 2012. Beginning in FY 2013 State courts will be required to submit the required data elements as part of required year-end reporting.

4. Tests of Procedures or Methods to be Undertaken

Nine State courts will be selected to test the Annual Strategic Plan/Program Assessment and data reporting templates. Test participants will be selected on a voluntary basis.

5. Individuals Consulted on Statistical Aspects and Individuals Collection and/or analyzing Data

The individuals listed below were consulted on the statistical aspects of the design.

- Victor E. Flango, Executive Director, Program Resource Development, National Center for State Courts(grantee as part of the National Child Welfare Resource Center on Legal and Judicial Issues and principal investigator/co-author of the measures to be implemented) Dr. Flango can be reached at (757)259-1823.
- Cynthia Samples, Senior Associate, Planning and

Learning Technologies (contractor) Ms. Samples can be reached at (703) 908-8872.

- Melissa Neal, Senior Analyst, Planning and Learning Technologies (contractor) 703.908.8873

David Kelly, the Federal Project Officer for the Court Improvement Program will be collecting and analyzing the information for the agency (202) 205-8709.