

## THE SUPPORTING STATEMENT

The Office of Management and Budget (OMB) requires that for approval under the Paperwork Reduction Act a Supporting Statement must be prepared in the format specified below. Information in the Supporting Statement should be provided in a manner that is responsive to the OMB instructions, and each item must be identified using the numbering system given by OMB. If the Supporting Statement exceeds 10 single-spaced pages in length, there should be a summary not exceeding one page in length which precedes it.

Every effort should be made to keep the Supporting Statement to a length of 10-12 pages. When possible, detailed information should be placed in an attachment, which is then referenced in an appropriate place in the Supporting Statement so that interested reviewers can peruse it. Each attachment should be referenced in the text, so that a reviewer knows why it has been included and which portions may be of particular interest. Brevity and clarity with respect to both the text of the Supporting Statement and any attachments are highly desirable; only the information requested by the OMB outline and needed to understand the project should be included.

This annotated electronic version of the OMB outline for a Supporting Statement has been prepared by the ACF, Office of Planning, Research and Evaluation (OPRE), to assist in the preparation of a request for clearance of an information collection. This template can be downloaded from the PRA E-Office information collection web site.

### **General Instructions**

**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.

## THE SUPPORTING STATEMENT

### Specific Instructions

#### A. Justification

##### 1. Circumstances Making the Collection of Information Necessary

The State and Local Child Access Program Survey (Survey) is due to expire July 2015. The Survey is used by the federal Office of Child Support Enforcement (OCSE) as the primary means for adhering to the statutory (Sec. 469B. [42 U.S.C. 669b]) and regulatory (45 CFR Part 303) requirements for recipients of “*Grants to States for Access and Visitation*” to report program data to OCSE on an annual basis (see Attachment A).

We are requesting OMB approval of the revised Survey (see Attachment B & C) for use beginning October 1, 2015 (FY 2016). This would allow grantees to continue collecting FY 2015 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 2016. 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 April 17, 2015 (see Attachment D) and received no written responses from state agencies or local service providers. The second Federal Register notice is expected to be published 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 (AV grant 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

AV 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 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: (1) a State Details page that summarizes various aspects of the program; and (2) a State Spreadsheet that compiles data received from AV-funded local grantees.

## 2. Purpose and Use of the 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 an annual AV grant program update report. 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. The Survey also assists in knowledge sharing between states and informs the public of how program funds are utilized.

## 3. Use of Improved Information Technology and Burden Reduction

The Survey is accessed and submitted via the web-based AV portal on the Federal Parent Locator Service (FPLS). The State Details pages consist of open text fields and multiple choice options for grantees to provide information on the use of their funds. These pages automatically pre-populate the most recent submitted content; meaning text submitted in the previous year will pre-populate on the State Details pages the following year, leading to a burden reduction for many states that submit the same program information every year. For states that wish to make changes can easily do so by editing pre-populated language or selecting “Clear” at the bottom of the page. The text boxes have a 4000 character limit with a minimum of one character, further reducing the burden on grantees.

The State Spreadsheet has been developed in Microsoft Excel and is accessible via the AV portal. States are expected to download the Spreadsheet and upload it to the AV portal where automatic data checks are run to ensure the form has no reporting discrepancies. If discrepancies

are found, an email notification is sent to the state informing them of what errors were found. These checks reduce burden on grantees by allowing them to address errors quickly.

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. It is also important that the data be collected annually so that OCSE is able to monitor the grant properly and provide quality technical assistance to states.

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

Not applicable.

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

OCSE published a 60-day notice in the Federal Register on April 17, 2015 (Attachment D) and received no responses. OCSE held an AV grant program meeting in Dallas, Texas in February 2015 which all state and territories were invited to and over 30 attended. A portion of the meeting focused on the AV survey and reporting system. Many of the grantees suggested that an “Other” option under the “Race/Ethnicity” category and there be space for an additional narrative section. Both of these suggestions are being sought in this information collection request. Additional suggestions including updating the technology of the system to accept survey submissions that have extra spaces in the spreadsheet. OCSE is working with its AV Portal contractor to fix these technical errors.

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

<b>No. of Respondents</b>	<b>No. of Responses Per Respondent</b>	<b>Average Burden Hours Per Response</b>	<b>Total Burden Hours</b>
54 States/Jurisdictions	1	16	864
331 estimated local service grantees	1	16	5296
<b>Total: 385</b>	1	16	<b>6160</b>

The total burden hours for the proposed revised Survey have slightly increased from 5,664 in 2012 to 6,160 for the following reasons:

- The average number of local service grantees has slightly increased over the past three years (from 300 to 331).

**Opportunity Cost: Estimates**

- Average hourly cost for state/local respondents: \$30

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 @ 20 percent time x annual salary (\$75,000) = \$15,000. The maintenance and oversight of the AV portal is currently contracted out at an estimated cost of \$50,000 per year.

15. Explanation for Program Changes or Adjustments

**Proposed Revisions to the Survey**

The Survey is divided into two parts: (1) a State Details page that summarizes various aspects of the program; and (2) a State Spreadsheet that compiles data received from AV-funded local grantees. Each year states are expected to fill out the State Details page and the State Spreadsheet which including information they have gathered from their sub-grantees when applicable.

#### Revisions to the State Details Page:

1. The “State Agency Contact Information” data element is collected via OCSE’s AV technical assistance coordinator when there is a change in programmatic contact by the state. Therefore we plan to remove this section from the State Details report.
2. The “Services Funded” data element will no longer include an “Other” option as all services provided should fall into the other categories listed per statute and regulations.
3. An additional option data field titled “Supplemental Narrative” was added to the AV portal to allow states to include information they would like to include in the report that cannot be collected elsewhere or to be used as a space to provide additional information on a previous topic if the character limit of 4000 was surpassed.
4. The previous “Summary Table” that was required by states has now been eliminated since the AV portal is able to auto-populate this information by calculating totals of the local service providers.

#### Revisions to the State Spreadsheet:

1. The data element for “Local Provider Contact Information” will no longer include telephone numbers or email addresses.
2. Include “Other” option under the “Race/Ethnicity” category.

OCSE does not estimate an increase in burden hours as a result of these changes. The slight increase in burden hours from 5,664 in 2012 to 6,160 is due to an increase in the number of local service grantees.

#### 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 an annual AV grant program update report. 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. 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. The Survey also assists in knowledge sharing between states and informs the public of how program funds are utilized.

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

Not applicable.

#### 18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable.

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- Attachment A: “*Grants to States for Access and Visitation Programs*” statute and regulations: Sec. 469B. [42 U.S.C. 669b] and 45 CFR Part 303  
Attachment B: Proposed Revised Survey  
Attachment C: AV Survey Portal Instruction Manual  
Attachment D: April 17, 2015 1<sup>st</sup> FRN Announcement