

THE SUPPORTING STATEMENT

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Federal Office of Child Support Enforcement (OCSE) oversees administration of the Child Support Enforcement program in the 54 States and jurisdictions that participate in it. The Federal government sets program standards and policy, evaluates States' performance in conducting their program, and offers technical assistance and training to the States. It also conducts audits of State program activities.

In its oversight role, the Federal government is responsible for receiving Self-Assessment reports submitted by states and, as appropriate, providing to the States comments, recommendations for additional or corrective action, and technical assistance that a State may need. In addition, the submitted reports are reviewed and analyzed by OCSE to identify "best practices" to be shared with other States. The authority to collect and report information requested on this form is found in section 454(15) (A) of the Social Security Act.

Attachment B contains the recommended Self-Assessment reporting format and instructions for completing it.

2. Purpose and Use of the Information Collection

The Self-Assessment reports are intended to give States the opportunity to assess whether they are meeting Federal requirements for providing child support services and providing the best services possible. In addition, these reports are used by OCSE to monitor State compliance in areas critical to successful State child support programs.

Child support enforcement can play a pivotal role in reducing welfare dependency, with savings to the Federal Government. One aspect of motivating States to take the necessary action is to pinpoint program areas where improvement is critical and warrants priority attention.

The information submitted in this report will be used to:

- a) approve IV-D State plan amendments certifying that the State has a self-assessment review process;
- b) identify best practices to be shared with other States;
- c) evaluate areas where technical assistance may be required by a State; and
- d) provide Federal auditors with an indication of where their efforts should be concentrated during compliance audits.

3. Use of Improved Information Technology and Burden Reduction

The improved information technology which would reduce the burden is not yet available in all States. There are no technical or legal obstacles which prevent burden reduction.

4. Efforts to Identify Duplication and Use of Similar Information

This report will be the only method used by States to report their assessment of the performance of their own child support enforcement programs. No data are reported elsewhere and there is no other report in use by OCSE/ACF which collects similar State information.

5. Impact on Small Businesses or Other Small Entities

This reporting requirement is imposed on State government agencies. No small businesses complete this form.

6. Consequences of Collecting the Information Less Frequently

The data collected in the Self-Assessment reports are used annually by OCSE to evaluate State programs and to identify areas where program improvement may be required and to set in motion tailored strategies for achieving such improvement. Failure to collect this data would preclude the Department from monitoring and evaluating the success of the program.

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

This collection is conducted in a manner consistent with guidelines in 5 CFR 1320.6. There are no special circumstances.

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

The recommended format for the Self-Assessment report was developed under a contract with the Office of Child Support Enforcement. As a part of this effort, Federal and State partners convened a Self-Assessment workgroup to provide guidance in developing this uniform reporting format. This reporting format is not required though it is highly recommended to improve the accuracy and consistency in reporting throughout the States

OCSE received two comments from state IV-D agencies. The commenters addressed whether the proposed collection of information is necessary for the proper performance of the functions of the agency. The commenters were also concerned about the accuracy of the agency’s estimate of the burden of the proposed collection and they suggested a way to minimize the burden of the collection on respondents.

Response to comments: The annual self-assessment's purpose is to give a State the opportunity to assess whether it is meeting Federal requirements for providing child support services and providing the best services possible. It is to be used as a management tool, to help a State evaluate its program and assess its performance. OCSE will reexamine the burden hours estimate in an internal working group. Plans for the workgroup are underway with an anticipated start date of spring 2016 which will consist of interested state people and OCSE regional and central office staff. The goals of this workgroup is to discuss comments received from states (see attachment) and ways to improve and use the self-assessment data, best practices, sample size, etc.

9. Explanation of Any Payment or Gift to Respondents

No payments or other remuneration to respondents are made for the collection of this information.

10. Assurance of Confidentiality Provided to Respondents

The data reported contain no private information for individuals.

11. Justification for Sensitive Questions

Data are reported only on an aggregate basis. There is no personal information or data of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

Based on experience from other data collection efforts, the burden on all State agencies is estimated at 216 hours per year, calculated as follows:

Form name	No. of respondents	No. responses Response per respondent	Hrs. per response	burden
Self-Assessment	54	1	4	216

The burden cost is estimated to be \$40.00 per hour for a total of \$160.00 per respondent (\$40.00 x 4). Total burden cost for all respondents is \$8,640.00 (216 x 40), as indicated below:

<u>Form name</u>	<u>No. of Hourly respondents</u>	<u>No. responses per respondent</u>	<u>Hrs. per response</u>	<u>Response burden</u>	<u>Response rate</u>
Self-Assessment	54	1	4	216	\$40.00

The estimated annualized cost to the respondents is \$8,640.

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

The States are already collecting more information than this report requires. There should be no additional costs as a result of the form.

14. Annualized Cost to the Federal Government

Cost to the Federal Government is estimated at \$5,000 for tabulation and analyzing the data.

15. Explanation for Program Changes or Adjustments

There are no program changes or adjustments to this instrument.

16. Plans for Tabulation and Publication and Project Time Schedule

Data collected in this report will be for internal use only, not for publication.

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

The expiration date will be displayed.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification statement.

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

1. Respondent Universe and Sampling Methods

Section 454(15)(A) of the Act (42 U.S.C. 654(15)(A)) contains a requirement for each State to annually assess the performance of the State's child support enforcement

program under title IV-D of the Act in accordance with standards specified by the Secretary, and to provide a report of the findings to the Secretary.

Section 308.1(b) specifies that a State must either review all of its cases or conduct sampling which meets the criteria specified. Due to the differences in administrative structures in States, we did not prescribe a single sampling formula for universal use by all States. Instead, under paragraph (b), a State has discretion in designing its own sampling methodologies that could be tailored to meet individual State needs. However, under paragraphs (b)(2) and (3), each State must maintain a minimum confidence level of 90 percent for each criterion, select statistically valid samples, and assure that there are no portions of the IV-D case universe omitted from the sample selection process.

Using the incremental approach, a State selects cases from several periods during the review period and adds the results to provide a picture of performance for the entire period. The State would draw a separate sample for each incremental review period. The incremental approach enables the State to spread its review effort over time and make more efficient use of available resources because the sample size could be smaller, while allowing the State to identify problem areas and take corrective action prior to the end of the review period. For those States who review their case samples incrementally, the cases selected must be reviewed and evaluated for the actions required at the beginning of the incremental review period.

2. Procedures for the Collection of Information

Using the incremental approach, a State selects cases from several periods during the review period and adds the results to provide a picture of performance for the entire period. The State would draw a separate sample for each incremental review period. The incremental approach enables the State to spread its review effort over time and make more efficient use of available resources because the sample size could be smaller, while allowing the State to identify problem areas and take corrective action prior to the end of the review period. For those States who review their case samples incrementally, the cases selected must be reviewed and evaluated for the actions required at the beginning of the incremental review period.

3. Methods to Maximize Response Rates and Deal with Nonresponse

We expect States to use the self-assessment as a management tool and to be entirely accurate and objective when reporting their performance. To do otherwise would only harm the State and its future performance. In addition OCSE will provide any State the technical assistance it needs to meet these requirements.

4. Test of Procedures or Methods to be Undertaken

OCSE issued a Techniques for Effective Management of Program Operations (TEMPO) monograph on statistical sampling for self-assessment.

5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data

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

Dennis Putze

Division of Performance and Statistical Analysis

Office of Child Support Enforcement

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