



Jack Dalrymple, Governor
Maggie D. Anderson, Executive Director

March 4, 2016

Administration for Children and Families
Office of Planning, Research and Evaluation
370 L'Enfant Promenade SW
Washington, DC 20447
Attn: ACF Reports Clearance Officer
Submitted via Email: infocollection@acf.hhs.gov

SUBJECT: Proposed Information Collection Activity; Comment Request
Title: State Access and Visitation Grant Application OMB No. 0970-NEW

To Whom It May Concern:

Thank you for the opportunity to provide comments regarding proposed changes to the State Access and Visitation Grant Application; the notice of which was provided in the Federal Register on January 7, 2016, (81 FR 783) and via a January 27, 2016, email from Jessica Lohmann. Ms. Lohmann's email included the following:

- January 7, 2016, Federal Register Notice and
- Proposed application.

Following are North Dakota Child Support's comments regarding the proposed changes to the State Access and Visitation Grant Application.

We appreciate that the format being proposed is an application that would be maintained and updated as needed over time; that it would not need to be resubmitted in its entirety each time an application is due. We support efforts to reduce the resources needed to administer this grant.

However, while not stated, it seems likely that an expanded application will ultimately mean that states will be required to submit expanded annual surveys. The result will be a double resource hit for states.

We are concerned that this extensively expanded application will result in increased time spent administering a grant that is relatively small and, due to its recurring nature, is already anticipated by the access and visitation centers before it is received.

OCSE is strongly encouraging states to prioritize noncustodial parents with child support cases in the Title IV-D program. However, there is no mechanism to match Access and Visitation grant service recipients with the child support caseload because personal identifying information is not reported under the grant.

Our state's decision not to require the reporting of personal identifying information was discussed and made in the past. Our experience was that requesting personal identifying information was counterproductive to our purpose. While in principle we are not opposed to client self-reporting in this area, we do not support any change that would ultimately require the reporting of personal identifying information. In addition, our experience has been that access and visitation centers are reluctant to broach the subject of child support with their clients. Their feeling has been that these are already volatile situations and that asking about child support only adds fuel to an emotional fire.

AT-99-07 Final Rule: Grants to States for Access and Visitation Programs Response to Comments section included phrases such as:

- The philosophy of this Act is to allow States maximum flexibility...We would not want to limit the flexibility States have under this act to address unmet needs.
- The philosophy behind this program is to give the States maximum flexibility.
- ...preserving State flexibility and minimizing burden.
- ...we wanted to avoid complexity and ambiguity.

The proposed expanded application appears to reflect a move from the above philosophy, both in terms of resource focus and complexity. We would encourage that the original philosophy (e.g., allowing state flexibility, minimizing burden, avoiding complexity) continue to guide the Access and Visitation grant program.

As additional data elements and reporting requirements have been added and now as additional application requirements are being proposed, the amount of time required to administer this grant continues to grow and is becoming increasingly disproportionate to the size of the grant.

Thank you for your consideration of our comments.

Sincerely,



Barbara Reiersen, Operations Manager
North Dakota Child Support Division

cc: Michael Hayes, Senior Programs Manager, OCSE via email
Tracy Graham, Program Specialist, OCSE via email
Diane Degenhart, Program Manager OCSE via email

From: [InfoCollection \(ACF\)](#)
To: [Lohmann, Jessica \(ACF\)](#)
Subject: FW: State Access and Visitation Grant Application
Date: Thursday, March 03, 2016 9:47:54 AM

fyi

From: Schintz, Kathleen [mailto:kschintz@pa.gov]
Sent: Monday, February 29, 2016 8:01 AM
To: InfoCollection (ACF)
Subject: State Access and Visitation Grant Application

Please see Pennsylvania Bureau of Child Support Enforcement's comments to the proposed changes to the State Access and Visitation Grant Application below:

Section 1- Cover Letter: the first bulleted paragraph states "10 percent." However, the math formula used does not match ten percent. Ten percent of \$100,000 = \$10,000. The formula used in the proposed application is actually over 11 percent.

Section 5- Administrative Structure: is a new section. This section asks for a description of staff qualifications for the program coordinator, which is beyond practical utility.

Terms and Conditions: Reporting Financial Status: section b. example should be FY 2017 and not 2011.

Overall, the proposed new application process is more detailed and more burdensome. Pennsylvania predicts 40 hours plus, for collection of the proposed detailed data. Some sections ask for copies of MOUs and copies of evaluation reports and findings for the last three years. Most of our Grant Agreements are 200+ pages. Although the proposed application provides more clarity, it does not minimize the burden of collecting the data, but rather, increases the burden to state, county, and sub-grantee staff. In addition, this proposed application would be better served using an electronic fillable format.

Please let me know if you have any questions.

Thanks,
Kathy

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From: [InfoCollection \(ACF\)](#)
To: [Lohmann, Jessica \(ACF\)](#)
Subject: FW: State Access and Visitation Grant Application Comments
Date: Wednesday, March 09, 2016 11:08:46 AM

fyi

From: Jenicek, Kirsten (DSHS/DCS) [mailto:jenickl@dshs.wa.gov]
Sent: Friday, March 04, 2016 12:11 PM
To: InfoCollection (ACF)
Subject: State Access and Visitation Grant Application Comments

The instructions for this application process look very thorough and comprehensive. The process looks straightforward and appears to align well with the purpose and intent of the grant.

I have a just a couple of comments on this. One is a suggestion to clarify whether it would be acceptable to have the AV Program Coordinators have the ability to sign the cover letter. As written, it states that the cover letter must be signed by a senior level official in the state administering the AV program. I'm not clear what exactly would meet the definition of senior level official, but I'm thinking that would likely be the IV-D Director level. I am both the Grants Manager and the AOR for the agency, and prepare and sign these letters myself for other grants that I submit to OCSE. I also administer the AV Grant Program. Having to route the letter up a level for signature would add a step to the process. A suggestion would be to add something to the effect of "Cover letter from senior level official in the state agency administering the grant funds, or their designee". Or "Cover letter from senior level official or AV Program Coordinator in the state agency administering the grant funds".

The other thing is regarding the state point of contact, on page 4. It is noted that the annual notice of grant award letter will be mailed to that person, and that an e-copy of the letter will be sent to the state AV Program Coordinator. In most instances that will be the same person. I would prefer to have both directed to me with a copy to our IV-D Director. Last year I missed receiving the award letter because it was sent to the Director's Office and the staff person processing it did not make the connection to forward it on to me. I didn't receive it until several weeks after the fact.

We appreciate the opportunity to provide comments on this and look forward to submitting our application for FYs 2017-2019.

Kirsten Jenicek

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