

## 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.

An application will be required every five years. A self-assessment and updated strategic plan will be required to monitor progress on an annual basis. Both the self-assessment and strategic plan template have been developed with in-depth grantee input and feedback. The goal has been to design a process and tools that will be useful to the grantees and meet reporting requirements.

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 self-assessment and updated strategic plan. The self-assessment is designed to be an opportunity for grantees to reflect on accomplishments and challenges. It also serves as a monitoring tool that allows CB to identify areas in which technical assistance may be helpful to the grantee. The self-assessment reports also allow CB to identify and track national trends.

**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 self-assessment report is the primary form of accounting and accountability to ensure funds are being used in compliance with the statute. Self-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 8/4/2015, vol.80, page 48868. 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 in 2015. 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 series of smaller focus groups to specifically discuss the self-assessment and strategic plan templates were held in February, March and April 2016. Draft sections of the attached PI were reviewed. :

- Tina Amberboy, Texas CIP Director (512)-463-9352
- 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;
- Christine Kiesel, New York CIP Director (315)266-4254;
- Sandy Moore, Pennsylvania CIP Director (717)795-2000;

The below grantee technical assistance providers were involved in ongoing review of the attached documents. Both providers have extensive experience in court evaluation and high degrees of familiarity with the **CIP**:

- Dr. Alicia Summers, National Council of Juvenile and Family Court Judges (775)784-7570

- Dr. Victoria Weisz, Retired NE CIP Director, contractor  
[Vweisz1@unl.edu](mailto:Vweisz1@unl.edu)

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  
(202)662-1731
- Scott Trowbridge, Assistant Director of the National Child Welfare Capacity Building Center for Courts  
(202)662-1747
- Alicia Davis, JD., National Center for State Courts  
(303)308-4331
- Christopher Church, JD, University of South Carolina Law Center [church@law.sc.edu](mailto:church@law.sc.edu)

**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 of how the State court will implement CQI approaches to use data in identifying needs and desired outcomes and measuring progress toward those outcomes;
5. A list of the members of the statewide multidisciplinary taskforce;
6. A proposed five year strategic plan; and
7. 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:**

ANNUAL BURDEN ESTIMATES

Collection	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
Complete Application	52	1	40	2080
Complete Program	52	1	36	1872

Assessment Report				
Updated strategic plan	52	1	12	624

Estimated Total Annual Burden Hours: 4,576

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 4,576 hours = \$343,200. 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 52 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**

The following program changes are being made to streamline and add value to the application and reporting processes for grantees:

- (1) One combined application due every five years.
- (2) One self-assessment due annually.
- (3) Updates to strategic plan (as informed by self-assessment) due annually.

The previous approval for OMB Control No: 0970-0307 was for 9,256 burden hours.

With the streamlined self-assessment and strategic plan templates, the total number of burden hours estimated for States applying for all three CIP grants is now 88 hours. This is a reduction from 178 hours under the previous approval. Cumulatively, with 52 applicants for each grant (52 x 88) this amounts to 4476 burden hours, a reduction of nearly fifty percent from the previous approval.

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 for all aspects of program operation. CB will also facilitate periodic review calls with each State to discuss progress toward meeting the stated objectives.

**4. Tests of Procedures or Methods to be Undertaken**

State courts will be given the option of completing the annual self-assessment online through survey monkey.

**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.

- Dr. Alicia Summers, National Council of Juvenile and Family Court Judges (775)784-7570
- Dr. Victoria Weisz, Retired NE CIP Director, contractor [Vweisz1@unl.edu](mailto:Vweisz1@unl.edu)

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