

## THE SUPPORTING STATEMENT

### Specific Instructions

#### A. Justification

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

The requirement for submission of a state plan and plan amendments for the Child Support Enforcement program is found in legislation at sections 452, 454 and 466 of the Social Security Act (the Act). These sections are implemented by regulations at 45 CFR 301, 302, 303, 305, 307 and 308. States and territories are provided with instructions for completing the automated state plan and plan amendments in OCSE-AT-15-02.

The Office of Child Support Enforcement (OCSE) has approved a IV-D state plan for each state and territory. Attachments include the current state plan table of contents and a transmittal form, which states and territories send in with each state plan amendment. Federal regulations require states and territories to amend their state plans only when necessary to reflect new or revised federal statutes or regulations or material change in any state law, organization, policy, or IV-D agency operations.

According to 45 CFR 301.13, “After approval of the original plan by the Office, all relevant changes, required by new statutes, rules, regulations, interpretations, and court decisions, are required to be submitted currently so that the Office may determine whether the plan continues to meet federal requirements and policies.” States and Territories submit, on average, five preprint state plan pages and five transmittals annually to notify OCSE of relevant changes required by new state statutes, rules, interpretations and court decisions.

The Office of Management and Budget (OMB) approved the IV-D state plan Form OCSE-100. All states have had IV-D plans in place for years. Plans that are submitted now are normally specific preprint plan pages that are required by changes in state laws or processes, or required by federal law, regulations, or policies. We request approval of an extension of a currently approved collection.

##### 2. Purpose and Use of the Information Collection

The information collected on the state plan pages is necessary to enable OCSE to determine whether each state and territory has a IV-D state plan that meets the requirements in Title IV-D of the Act and implementing regulations. The state plan preprint page gives each state a convenient method for developing a statement to be submitted to OCSE for approval describing the nature and scope of its program and giving assurances that the program is administered in accordance with the requirements in Title IV-D of the Act and the implementing regulations at 45 CFR Chapter III. The state plan is analogous to a state having a contract with OCSE in that it outlines the

activities the state will perform as required by law in consideration for receiving federal funds to meet the costs of these activities. In this sense, the state plan is the basis for making federal funding available to the states in the costs of operating the Child Support Enforcement program.

3. Use of Improved Information Technology and Burden Reduction

In 2015 OCSE developed an online system to process state plan amendments. Revised procedures for the submission, review, and approval of state plan pages and attachments, as well as the user manual are available online in OCSE AT-15-02.

4. Efforts to Identify Duplication and Use of Similar Information

The collection of information requirements contained in this form does not duplicate any other reporting or recordkeeping requirements.

5. Impact on Small Businesses or Other Small Entities

The collection of information requirements does not involve small businesses or entities.

6. Consequences of Collecting the Information Less Frequently

States and territories will, for the most part, submit preprint state plan pages to OCSE on a one-time only basis to reflect new federal requirements. In addition, states and territories will periodically amend their state plans to reflect any material change in state laws, organization, policy, or IV-D agency operation.

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

The collection of information does not involve any special circumstances.

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

The first notice was published in the Federal Register on November 22, 2016 in Volume 81, Number 225 on page 83845. The comments received were in agreement with the information collection.

9. Explanation of Any Payment or Gift to Respondents

No payment or gift is provided to respondents, other than remuneration of contractors or grantees.

10. Assurance of Confidentiality Provided to Respondents

We do not assure confidentiality of the information collected.

## 11. Justification for Sensitive Questions

The required information collection does not involve asking questions of a sensitive nature.

## 12. Estimates of Annualized Burden Hours and Costs

The estimate of burden to respondents is based on the following assumptions:

- The 54 respondents include all states and territories participating in the Child Support Enforcement program: the 50 states, the District of Columbia, Guam, Puerto Rico and the U.S. Virgin Islands.
- In 2015, states submitted a total of eighteen preprint plan pages, an average of approximately three per year, as a result of changes in state laws, regulations, policies, and/or procedures. Recent federal regulations required states to submit a plan amendment to indicate that UIFSA 2008 has been passed by the effective date noted in P.L. 113-183 and that e-IWO has been implemented no later than December 31, 2015. As a result, it is estimated that states will submit five preprint state plan pages annually. All states have had complete state plans in place for many years.
- A state plan transmittal (OCSE-21-U4) will be submitted with each state plan preprint page.

<b>Instrument</b>	<b>Number of Respondents</b>	<b>Number of Responses Per Respondent</b>	<b>Average Burden Hours Per Response</b>	<b>Total Burden Hours</b>
State Plan (OCSE-100)	54	5	.5 hours	135 hours
State Plan Transmittal (OCSE-21-U4)	54	5	.25 hours	67.5 hours
Total			.75	202.5 hours

### Respondents' Cost for Hour Burden

The estimate of costs to respondents is \$29 per hour times 202.5 hours = \$5,873.

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

There are no additional direct costs to respondents.

## 14. Annualized Cost to the Federal Government

The annualized costs to the federal government for the hour burdens are based on an average wage rate of \$45 per hour for federal level employees who review submitted state plan pages from respondents. Estimates regarding the hours spent processing each state plan submission (0.5 hours for state plan and 0.25 hours for state plan transmittal) were determined by past employees' experiences in reviewing state plan pages in OCSE.

<b>Instrument</b>	<b>OCSE's Administrative Costs</b>	<b>Respondent Reimbursement Cost (66% of Total Annualized Cost)</b>	<b>Administrative Cost Plus Respondent Reimbursement Cost</b>
State Plan (OCSE-100)	\$6,075	\$2,584	\$8,659
State Plan Transmittal (OCSE-21-U4)	\$3,038	\$1,292	\$4,330
<b>Total</b>	<b>\$9,113</b>	<b>\$3,876</b>	<b>\$12,989</b>

15. Explanation for Program Changes or Adjustments

This is an adjustment based on the number of preprint state plan pages submitted over the past three years. There was also an increase in the average hourly wage of state employees who submit and federal employees who review state plans

16. Plans for Tabulation and Publication and Project Time Schedule

Not applicable

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

Not applicable

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable

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

The information collection requirements outlined in this report do not employ the use of statistical methods.