

THE SUPPORTING STATEMENT

A. Justification

1. Circumstances Making the Collection of Information Necessary

The State and Local Child Access Program Survey (Survey) is due to expire October 31, 2018. 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). The survey captures all required data points as specified in federal statute and regulation.

We are requesting OMB approval of the revised Survey (see Attachment B & C) for use beginning October 1, 2018 (FY 2019). This would allow grantees to continue collecting FY 2019 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 2019. The changes we propose are minimal and not expected to impact burden hours, and yet this additional information can be an aid to states and OCSE in terms of future planning for the Access and Visitation grants program.

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. The use of this survey does not require the use of statistical methods.

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 is required 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 vol. 83, page 4658 on February 1, 2018 (Attachment D) and received no responses. The second Federal Register notice is expected to be published concurrent with the HHS and OMB clearance process.

9. Explanation of Any Payment or Gift to Respondent

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

No. of Respondents	No. of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours
54 States/Jurisdictions	1	16	864
296 estimated local service grantees	1	16	4736
Total: 350	1	16	5600

The total burden hours for the proposed revised Survey have slightly decreased from 6,160 in 2015 to 5,600 for the following reason:

- The average number of local service grantees decreased over the past three years (from 331 to 296).

Opportunity Cost: Estimates

- Average hourly cost for state/local respondents: \$30. $\$30 \times 5,600$ hours equals \$168,000.

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 @ 15 percent time x annual salary (\$100,000) = \$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 Revision 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 includes information they have gathered from their sub-grantees.

Revision to the State Details Page: None

Revision to the State Spreadsheet:

- A. Change from OPTIONAL to REQUIRED the collection of information for columns AF – AJ (number of Child Support cases).

Given that this information is readily available, OCSE does not expect any increase in burden hours as a result of this change. This additional information is expected to be an aid to states and OCSE in terms of future planning for the Access and Visitation grants program.

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 typically published each year and/or posted on OCSE's website and sent to 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.

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

The use of this survey does not require the use of statistical methods.

-
- 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: February 1, 2018 1 FRN #1 Announcement