

**Child and Family Services Plan , Annual  
Progress and Services Report , and Annual  
Budget Expenses Request and Estimated  
Expenditures (CFS-101s)**

**OMB Information Collection Request  
0970 - 0426**

**Supporting Statement Part A -  
Justification**

**July 2020**

Submitted By:  
Children's Bureau  
Administration for Children and Families  
U.S. Department of Health and Human Services

## SUPPORTING STATEMENT A – JUSTIFICATION

### Summary

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

This supporting statement is for the Child and Family Services Plan (CFSP), Annual Progress and Services Report (APSR), the CFS-101, Parts I, II and III, and caseworker visit data. This information collection requirement incorporates many reporting requirements established by various statutes, as discussed below. Federal regulations implementing the CFSP, APSR, and CFS-101 are codified at 45 CFR 1357.15.

States, Territories, and Tribes are required to submit the CFSP, APSR, and CFS-101's in order to receive funding under title IV-B, subparts 1 and/or 2 (section 422 of title IV-B, subpart 1 [42 U.S.C. 622] and section 432 of title IV-B, subpart 2 [42 U.S.C. 629b] of the Social Security Act (the Act) respectively.)

A title IV-B reporting requirement for states, established by The Child and Family Services Act of 2006 (P.L.109-288, codified at section 424(e) of the Act) requires States to collect and report caseworker visit data for children under the care and responsibility of the state. The legislation requires states to report (1) the percentage of children in foster care under the responsibility of the state who were visited on a monthly basis by a caseworker; and (2) the percentage of the visits that occurred in the residence of the child.

States and tribes, as applicable, that receive funding through the Child Abuse Prevention and Treatment Act (CAPTA), Chafee Foster Care Program for Successful Transition to Adulthood (the Chafee Program), and/or the Chafee Education and Training Vouchers (ETV) have additional reporting requirements that are incorporated into the CFSP, APSR, and CFS-101's to ease the collection burden on grantees. Tribes are not eligible to receive funding under CAPTA and, therefore, do not have to meet its reporting requirements.

CAPTA requires states to submit a CAPTA State Grant Program Plan that remains in effect for the duration of the state's participation in the grant program. The CAPTA plan is to be coordinated "to the maximum extent practicable" with the title IV-B state plan (section 106(b)(2)(A) of the CAPTA, as amended). States are also required to prepare and submit an annual report describing how the funds provided under CAPTA were used to address the purpose and achieve the objectives of the grant program (section 108(e)).

In addition, section 477 of title IV-E of the Social Security Act [42 U.S.C. 677], authorizing the Chafee and ETV programs, requires the submission of a state/tribal program plan every five years describing how the state/tribe intends to "design and deliver programs to achieve the purposes of the section" (section 477(b) of the Act).

In order to help states/tribes plan comprehensively for the full array of child welfare services and minimize the collection burden, applicants (states and tribes, as applicable) are required to report on the progress in achieving stated goals and service delivery under title IV-B, CAPTA, Chafee, and ETV in the CFSP and APSR (45 CFR 1357.15(a)). The CFSP and the CAPTA plans were consolidated in FY 2000 and the Chafee Foster Care Independence Program (Chafee) was incorporated in the CFSP beginning in FY 2001. ETV was added in FY 2004.

The caseworker visit data requirement was added in 2007. The Children's Bureau (CB) believes this integrated approach reduces the burden on the state by allowing the state to submit one plan and to submit all plans on the same schedule. This approach encourages comprehensive planning and service delivery to children being served by the state's child welfare system.

The current request for a revision includes the following changes to the information collection.

- Beginning with the submission due on June 30, 2021, the CFSP/APSR submission will also include information on the use of the Family First Transition Grants and Funding Certainty Grants authorized by the Family First Transition Act included in Public Law (Pub. L.) 116–94.
- The CFS-101 forms have been revised to streamline data entry and to remove requests for prior year estimates that are not required by law in Part III of the CFS-101.

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

The CFSP and APSR are designed to guide the improvement of states' and tribes' child welfare services, as well as to provide a single reporting mechanism for the many federal program areas. States and tribes submit a CFSP once every five years and the APSR in each of the interim years. The CFS-101's are submitted every year, as required. The CFSP contains the goals and objectives that states and tribes intend to achieve during the five years and a strategic plan with tasks for each year. The CFSP also provides an update on the current year and acts as a final report for the previous five year period. The APSR provides updates on the progress the state or tribe is making in meeting its goals and objectives and details any necessary changes to the plan for the next fiscal year.

States and tribes must submit a CFSP/APSR with all applicable requirements met in order to receive funding under title IV-B, subparts 1 and/or 2. In addition, states' CFSP/APSR must include CAPTA, Chafee, and ETV reporting requirements in order to receive funding under those program areas. Eligible tribes must also submit information on the Chafee and ETV programs if they would like to receive funding. Also, states must meet the caseworker visit reporting requirements in order to receive the full 75 percent federal match available under title IV-B, subpart 1. However, funding for one program area is not impacted by the approval or disapproval of the plan for the other programs.

The CFSP and APSR are also used by agencies, organizations, and others with whom the state and the tribes coordinate services to achieve goals and objectives in the plan. CB Regional Offices use the information as a basis for providing support and technical assistance to states and tribes. The caseworker visit data is a required component of an Annual Child Welfare Outcomes report to Congress (section 479A(5) of the Act).

The Administration for Children and Families (ACF) grants management office uses the CFS-101's to track and allocate funding to states and tribes. The CFS-101, Part I is the annual budget request for all program areas. States and tribes may also use this form to request additional funds or to return unneeded portions of its allocation, which is then re-allocated to other grantees. The CFS-101, Part II is a summary of the estimated expenditures from each program area for each service or activity, as well as the projected number, population, and geographical areas to be served with the upcoming year's budget request. The CFS-101, Part III is an annual summary of the actual expenditures for the most recently completed fiscal year, as well as information on the geographic areas and number of individuals and families served. Part III includes actual expenditures by program area, numbers of families and individuals served by program area, and the geographic areas served for the last complete fiscal year.

CB also responds to requests for information from the Government Accountability Office, Congress, and other entities on the types of services states and tribes are providing, the amount of funds they are expending in various areas, and on the type of initiatives they are implemented using title IV-B, CAPTA, Chafee, and ETV funds.

### **3. Use of Improved Information Technology and Burden Reduction**

CB allows the states and tribes to submit the CFSP/APSR in Word or PDF format. The CFS-101 portion of the submission requires an electronic PDF copy with signature and an unsigned Excel worksheet (states only). In collecting the caseworker visit data, states with an automated case management system were encouraged to pull data directly from the database when feasible. Overall, there is no automated collection technique possible as the majority of the information collected in the CFSP/APSR is narrative text.

### **4. Efforts to Identify Duplication and Use of Similar Information**

The CFSP/APSR consolidates the reporting requirements of title IV-B, subparts 1 and 2, CAPTA, Chafee, and ETV into one document and one reporting cycle, reducing the duplication of data collection efforts. There are similarities between Child and Family Service Review (CFSR) processes including assessment information collected, caseworker visit data, and requirements for coordination with stakeholders. In order to avoid redundant reporting, states are encouraged to use the information required by the CFSR in the CFSP, where appropriate.

## **5. Impact on Small Businesses or Other Small Entities**

The collection of information is restricted to states and tribes as only states and tribes are eligible to apply for federal funds under these program areas. This information collection requirement has been held to the absolute minimum required to meet the statutory and regulatory requirements to receive funding under title IV-B, CAPTA, Chafee, and ETV.

In addition, for information collection from tribes, ACF has waived certain requirements and reduced the scope of other title IV-B reporting requirements in order to minimize the burden. (See 45 CFR 1357.15, 1357.40, and 1357.50 for more information.)

## **6. Consequences of Collecting the Information Less Frequently**

The submission of the CFSP, APSR, and CFS-101's are required prior to awarding federal funding as mandated by statute and regulation. If the collection is not conducted or conducted less frequently, the consequence to federal program or policy activities is that funds would not be able to be awarded to states and tribes. Without funds, states and tribes would not be able to provide needed services to the populations, as required by law. This collection burden can only be eliminated as a result of a legislative change.

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

There are no special circumstances required in the collection of this information in a manner other than required by OMB.

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

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on May 5, 2020, Volume 85, Number 87, page 26692, and provided a sixty-day period for public comment. We did not receive comments.

## **9. Explanation of Any Payment or Gift to Respondents**

No payment or gifts will be provided to any respondents.

## **10. Assurance of Confidentiality Provided to Respondents**

Data and information in the applications are not confidential. States and tribes are to make public both the CFSP and APSR (45 CFR 1357.15(v)). The CFS-101's and the caseworker visit data are required to be included in reports to Congress (section 432(c) and section 479A(5) of the Act, respectively.)

## **11. Justification for Sensitive Questions**

There are no questions of a sensitive nature in the application requirements.

## 12. Estimates of Annualized Burden Hours and Costs

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
APSR	233	3	82	57,318	19,106	\$36	\$687,816
CFSP	47	1	123	5,781	1,927	\$36	\$69,372
CFS-101, Part I, II, and III	233	3	5	3,495	1,165	\$36	\$41,940
Caseworker Visits	53	3	99.33	15,794	5,265	\$36	\$189,540
<b>Estimated Annual Burden Total:</b>					<b>27,463</b>	<b>Estimated Annual Cost Total:</b>	<b>\$988,668</b>

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2019, which is \$17.81 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$35.62 and rounded to \$36 for the purpose of the average hourly wage.

<https://www.bls.gov/oes/current/oes211093.htm>

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

There is no annual cost burden associated with these information collection instruments.

## 14. Annualized Cost to the Federal Government

	Staff Time (Hours)	Total Cost
Update and Development of the CFSP, APSR, and CFS-101	80	\$4,720
Review of documents submitted by States and Tribes		
APSR	2,320	\$295,118
CFSP	765	
CFS-101	1,864	
Caseworker Visits	53	
<b>TOTAL</b>	<b>5,082</b>	<b>\$299,838</b>

The estimate of the cost to the Federal government was based on \$59.00/hour (estimated salary, expenses, operating costs, etc.). We estimated 80 total staff hours for updates and development of the CFSP, APSR, CFS-101 and Caseworker Visit documents. For the review and approval of the documents submitted by the state and tribes, we estimated 5,002

hours of CB staff time (both at the Regional and Central Office).

**15. Explanation for Program Changes or Adjustments**

The estimated number of respondents was decreased to reflect the slight decrease in number of tribes applying for funding through the CFSP/APSR process. The “average hourly wage” was increased from \$30 per hour to \$36 to reflect the information published by the Bureau of Labor Statistics.

**16. Plans for Tabulation and Publication and Project Time Schedule**

Most information collected is not published by the federal government. Basic tabulations will be conducted on the caseworker visit data for the Annual Child Welfare Outcomes Report to Congress. There is no end date for the collection of data. In addition, ACF is required to submit an annual report to Congress on Child Welfare Expenditures using data submitted by states on the CFS-101 forms.

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

The Department will display the expiration date on the Program Instruction to the states and tribes describing the information collection requirements. The expiration date will also appear on the CFS-101 forms.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions to the certification statement.