

# **Child Support Enforcement Program Advance Planning Document Process**

**OMB Information Collection Request  
0970 - 0417**

## **Supporting Statement Part A – Justification**

**December 2020**

Submitted By:  
Office of Child Support Enforcement  
Administration for Children and Families  
U.S. Department of Health and Human Services

## SUPPORTING STATEMENT A – JUSTIFICATION

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

This information collection is necessary to fulfill requirements of 45 CFR Part 95, Subpart F, State Systems Advance Planning Document (APD) Process, which governs the process by which states may submit a vehicle to the Office of Child Support Enforcement (OCSE) Division of State and Tribal Systems (DSTS) in order to request a review of project Automated Data Processing (ADP) goals and objectives to obtain approval from the OCSE for Federal Financial Participation (FFP) in the costs of acquiring equipment and services.

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

This information collection is authorized by 42 U.S.C. 1302 of the Social Security Act. Section 1102 of the Social Security Act authorizes the Secretary to publish regulations as may be necessary for the efficient administration of the functions with which the Secretary is responsible under the Act. The purpose of this information collection is to assist OCSE in determining if a state is eligible for FFP to acquire ADP system equipment and services. OCSE uses the information received for internal decision making. Data collection forms include the following:

- **Request for Proposal (RFP) and Contract:** Acquisitions for the procurement of ADP equipment and services (e.g., Design Development and Implementation, Quality Assurance, Independent Verification & Validation, Training, and Operations and Maintenance), includes forwarding each solicitation to OCSE for review and approval, prior to releasing each to the vendor community, receiving proposals, conducting source selection, preparing the draft contract, forwarding each contract to OCSE for review, and subsequently awarding each contract.
- **Emergency Funding Request:** Situation where a state can submit an APD that demonstrates to OCSE an immediate need to acquire ADP equipment or services in order to continue the operation covered by Subpart F, when a public exigency or emergency exists where the urgency for the requirement did not permit delay.
- **Biennial Report:** This activity includes the establishment of a security plan including policies and procedures to address the following areas of ADP security: (a) physical security; (b) equipment security; (c) software and data security; (d) telecommunications security; (e) personnel security; (f) contingency planning; (g) emergency preparedness; and (h) designation of an Agency ADP Security Manager. Additionally, a state must also establish and maintain a program for conducting periodic risk analyses.
- **Advance Planning Document (APD):** States submit an APD to DSTS demonstrating sound project planning and management, and providing a recorded plan of action to request funding approval for a project which will require the use of ADP services and equipment. Also used to uniquely report

significant changes to the project approach, procurement, methodology, schedule, or costs. Also used to provide detailed information on project and/or budget activities if required as an approval condition of a prior APD.

- **Operational Advance Planning Document Update:** States submit this update annually when no development projects are being done to provide a summary of Operations and Maintenance activities, annual funding.
- **IV&V ongoing / IV&V semiannually / IV&V quarterly:** This is the set of verification and validation over-site activities performed outside the state organization that is developing the software. IV&V services must be provided and managed by an organization that is *technically* and *managerially independent* of the subject software development project.
- **System Certification:** Provides the ability to meet specific requirements for automated child support enforcement systems and defines nine general areas of functional criteria these systems must support. These nine areas are case initiation, locate, case establishment, case management, enforcement, financial management, reporting, security/privacy and customer service.

For additional information about each information collection, see the APD Guide.

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

HHS allows APD documents to be transmitted by e-mail, and large files may be submitted by CD-ROM or DVD media.

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

There is no duplication or use of similar information because the ADP information collection is unique to HHS grant-in-aid programs.

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

There is no impact on small businesses or other small entities.

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

HHS requires annual updates for the APD. An annual APD submission is required to match the state's normally annual state legislative budgetary cycle for appropriations. A less frequent submission would adversely affect DSTS's ability to provide accurate matching federal financial participation (FFP) based on funds in state budgets for the state share of information technology (IT) expenditures. For those states with multi-year IT legislative authority, OCSE has discretionary authority to approve federal funding for a longer period of time.

The consequence of not submitting the System Certification documentation for a system certification review will result in more time being spent on-site during the review process and the need for additional state staff to be available on-site to respond to questions.

The consequence of not submitting a waiver request through the Advance Planning Document for a waiver of the requirement for a single state statewide system is that the waiver cannot be reviewed or approved. States with a waiver for not implementing a state-wide child support enforcement system are required to summarize their waiver status in each Annual APD submission, in order to keep the waiver valid. There are currently no states with a waiver for an Alternative System Configuration.

The consequences of not conducting Independent Verification and Validation (IV&V) oversight services is a potential disapproval of the state's APD, resulting in the suspension of funding for its statewide child support enforcement system.

**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**

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 September 4, 2020, Volume 85, Number 173, pages 55298-55299, and provided a sixty-day period for public comment. No comments were received.

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

Not applicable.

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

Confidential information is not collected.

**11. Justification for Sensitive Questions**

Sensitive questions are not asked.

## 12. Estimates of Annualized Burden Hours and Costs

Instrument	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
Request for Proposal (RFP) and Contract	50	4.5	4	900	300	\$37.26	\$11,178.00
Emergency Funding Request	21	1	2	42	14	\$37.26	\$521.64
Biennial Reports	54	1.5	1.5	121.5	40.5	\$37.26	\$1,509.03
Advance Planning Document	44	3.6	120	19,008	6,336	\$37.26	\$236,079.36
Operational Advance Planning Document	10	3	30	900	300	\$37.26	\$11,178.00
Independent Verification and Validation (ongoing)	3	12	10	360	120	\$37.26	\$4,471.20
Independent Verification and Validation (semiannually)	4	6	16	384	128	\$37.26	\$4,769.28
Independent Verification and Validation (quarterly)	10	12	30	3,600	1,200	\$37.26	\$44,712.00
System Certification	3	3	240	2,160	720	\$37.26	\$26,827.20
<b>Estimated Total Annual Burden Hours:</b>					<b>9,158.50</b>	<b>Total Annual Cost Estimate</b>	<b>\$341,245.71</b>
						:	

States modernizing Child Support Enforcement (CSE) systems are required to conduct feasibility studies, provide full APD project life-cycle updates, submit all procurement vehicles (i.e. RFP's, contracts, contract amendments, etc.) for federal prior approval to execution, increase the frequency of IV&V project oversight to either quarterly or full-time, and prepare for lengthy on-site system certification reviews to demonstrate all core functional child support system requirements. Burden estimates are based on the current number of state child support agencies and the experienced time to complete information collection materials since the previous approval. See A15 for information about changes since the previous approval. To calculate the annual burden hours, the total number of respondents were multiplied by the total number of responses per respondent over the 3 year extension period. This was then divided by 3 to provide an annual number.

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 \$18.63 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$37.26. The estimate of annualized cost to respondents for hour burden is \$37.26 times 9,158.50 hours or \$341,245.71. <https://www.bls.gov/oes/current/oes211093.htm>

**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 estimated annual cost to the federal government is \$962,437. The cost is based on the approximate annual salaries of twenty-one GS-14 full time equivalent DSTS federal analyst required to oversee the ADP program, calculated as follows: \$137,491 (average GS-14, step 5 salary) x 7 federal employees.

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

The total estimated annual burden hours increased from 6,414 to 9,158.50 since OMB last approved this collection. This change reflects an increase in the number of requests for approval of RFP and Contracts, Advance Planning Document updates, and requests for Emergency Funding. First, there has been an increase in the number of states implementing modernization solutions in efforts to replace legacy child support enforcement systems over a 3-year period. States replacing/modernizing CSE systems are required to conduct feasibility studies, expand APDs to provide more project detail, and prepare for lengthy on-site system certification reviews. Secondly, excess demand for emergency funding requests due to the impacts of the COVID-19 pandemic increased the volume of overall Emergency Funding Requests.

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

The APD is submitted annually and the Security review is submitted biennially. State child support agencies complete other materials as-needed; there is no specific schedule for data collection over the three year approval period.

There are no plans for publication of information received through this information collection.

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

Not applicable.

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

There are no exceptions to the certification statement.