

**State Self-Assessment Review and Report**

**OMB Information Collection Request**

**0970 - 0223**

**Supporting Statement Part A -  
Justification**

**February 2022**

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

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

The federal Office of Child Support Enforcement (OCSE) oversees administration of participating Child Support Enforcement (CSE) programs in the 54 states and territories (states). OCSE sets program standards and policy, evaluates CSE agencies performances, and offers technical assistance and training to the CSE agencies.

States are required to submit annual State Self-Assessment Reviews and Reports (SAR). In its oversight role, OCSE provides recommendations to states for additional or corrective action; offers technical assistance; and identifies states' best practices. The authority for states to submit the SAR report and for OCSE to collect and use the information for oversight purposes is found in section 454(15) (A) of the Social Security Act (42 U.S.C. § 654(15)(A)).

This request is for a renewal with minor changes to the burden hour.

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

The SAR provides states with an opportunity to assess federal program requirements and to evaluate whether they are providing the required and best child support services possible. OCSE uses the states' reports to monitor compliance in areas critical to success.

OCSE uses information from the SAR to:

- Pinpoint critical state program areas where improvement warrants priority attention
- Approve IV-D state plan amendments certifying that the state has a self-assessment review process
- Identify best practices to share with other states
- Evaluate areas where a state may require technical assistance
- Provide federal auditors with an indication of where to concentrate efforts during compliance audits

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

OCSE developed the automated OCSE Self-Assessment Reporting System for states to automate reporting, which increases efficiency and results in a minimal burden.

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

The SAR is unique. It is the only method available for states to assess CSE agency program performance and compliance.

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

Not applicable to small businesses or entities.

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

Collecting SAR information less frequently, or not at all, would violate federal laws and prevent OCSE's oversight function of state CSE programs.

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

There are no special circumstances.

## **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), OCSE published a notice in the Federal Register at 86 *Federal Register* 62545 on November 10, 2021. The notice announced OCSE's intention to seek OMB approval of the collection of information and provided a 60-day period for public comment.

As a result of a prior workgroup's suggestions, the proposed burden hour has been increased in this renewal from 4 hours to 8 hours as indicated in the *Federal Register* publication of the 60-day notice. We recognize that the actual time spent by each state varies quite a bit, based on a number of factors, including the size of the state, systems used, etc. We have done our best to provide an estimate that represents an *average* time spent to respond to the self-assessment.

During the 60-day notice and comment period, OCSE received one comment from the California Department of Child Support Services (DCSS). California commented about its completion process for the SAR and the hours required for the state to respond. We considered that comment carefully. OCSE will continue to provide technical assistance and guidance to states and support them in whatever way we can. Only one state commented – a very large state with a complicated system. We do not feel that we have enough information to further increase the proposed burden hour. Attachment A includes California DCSS's full comment and a response from OCSE.

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

Not applicable.

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

The SAR does not request the states to report confidential information.

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

The SAR does not request the states to report sensitive information.

## 12. Estimates of Annualized Burden Hours and Costs

Burden estimates are based on 54 state agencies reporting annually. Although the burden per response varies by state, based on prior experience, we estimate the proposed average time to respond to the SAR is 8 hours per year.

| Information Collection Title                                   | Number of Annual Respondents | Total Number of Annual Responses Per Respondent | Annual Burden Hour Per Response | Annual Burden Hours | Average Hourly Wage | Annual Cost |
|--|------------------------------|---|---------------------------------|---------------------|---------------------|-------------|
| State Self-Assessment Report (SAR) SAR Report and Instructions | 54                           | 1   | 8                               | 432                 | \$46.56             | \$20,114    |

OCSE calculated the cost to respondents using the Bureau of Labor Statistics job code 21-1021 (Child, Family, and School Social Workers) and wage data from May 2020, which is \$23.28 per hour. To account for fringe benefits and overhead, the rate was multiplied by two, which is \$46.56. The estimate of the annualized cost to respondents for hour burden is \$46.56 times 432 hours or \$20,114.

[https://www.bls.gov/oes/current/oes\\_stru.htm](https://www.bls.gov/oes/current/oes_stru.htm)

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

There are no additional costs for states to provide the SAR.

## 14. Annualized Cost to the Federal Government

Approximate annualized cost to the government includes 1,040 federal staff hours for analysis at the hourly rate of approximately \$25.58 per hour. To account for fringe benefits and overhead, the rate was multiplied by two, which is \$51.16. Total estimated cost, therefore, is \$53,206 (1,040 X \$51.16).

## 15. Explanation for Program Changes or Adjustments

After reviewing prior workshop comments from a small sample of states, the program team determined that the burden hour should be increased from the current 4 hours to the proposed 8 hours to give states additional time to complete the SAR report.

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

Data tabulated by states for the SAR is for OCSE internal use only.

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

The expiration date will be displayed.

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

There are no exceptions to the certification statement.