

## **The California Department of Child Support Services' Comment to OCSE 86 FR 62545 Proposed Information Collection Activity; State Self-Assessment Review and Report**

### **Comment:**

The California Department of Child Support Services (DCSS) supports the requested 3-year extension of the State Self-Assessment Review and Report, as it is the most reliable and comprehensive way to ensure fulfillment of federal time frame requirements as stated in 45 CFR 308.1.

The Self-Assessment Review and Report provides a valuable overview of how the DCSS performs in federally mandated program areas. Of the functions measured in the review, 46% have been automated in the Child Support Enforcement (CSE) system to ensure they are completed within the required time frames. As a result, the review serves as validation that the system is functioning as designed and provides the opportunity to identify defects in CSE's programming that may hinder the DCSS's ability to meet statutory requirements.

The Self-Assessment Review and Report is a reliable measure of performance in the partially automated and manual functions and may lead to deeper reviews throughout the year as warranted. The complexity of the broader program, though, requires the DCSS to spend the remainder of the year performing in-depth studies of various program areas to ensure proper performance both statewide and at the local level. The DCSS spends approximately 500 hours in the preparation of the self-assessment review and report from end-to-end, including: research, staff training, case review, preparing non-compliance notices to counties, researching rebuttals to non-compliance findings, and drafting the final report to the Office of Child Support Enforcement.

Given the thoroughness of California's process, the DCSS is confident that the information collected is accurate and clear. The bulk of the hours is spent on reviewing cases: initial review, peer review, and team review of potential non-compliance cases, which ensures accuracy in non-compliance findings via multiple levels of review. The technological limitations of our CSE system prevent further automation of the review process at this time. CA DCSS will continue to explore ways to streamline, improve, and automate their process as much as possible with the tools available to them. Doing so will ensure that staff hours are spent reviewing the program areas that provide the most value to the local child support agencies, thereby improving the delivery of child support to the families DCSS serves.

### **OCSE Response:**

We appreciate the confirmation that CA DCSS continues to support the required self-assessment. OCSE also applauds the dedication and resources CA spends in conducting their self-assessment each year.

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.

California commented about its completion process for the SAR and the hours required for the state to respond. We considered that comment carefully. There are other activities outlined in this comment that are related, but not a direct result of this information collection (updating systems, correcting case-

work issues, etc.). OCSE will continue to provide technical assistance and guidance to states and support them in whatever way we can. Only one state - and a very large state with a complicated system - commented. We do not feel that we have enough information to further increase the proposed burden hour. Thank you again for your comments and all the work you put into the self-assessment.