**State Self-Assessment Review and Report**

OMB Information Collection Request

0970 - 0223

Supporting Statement Part A - Justification

**April 2025**

Type of Request: Extension

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 Office of Child Support Enforcement (OCSE) oversees the administration of participating child support programs in the 54 states and territories (states). OCSE sets program standards and policy, evaluates state child support agency (CSA) performance and offers technical assistance and training to the state CSAs.

The authority requiring state CSAs to submit an annual State Self-Assessment Review and Report (SARR) 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). In its oversight role, OCSE provides recommendations to state CSAs for additional or corrective action, offers technical assistance, and identifies best practices among state CSAs.

This request is for an extension. Contact information has been updated to ensure it is current.

1. **Purpose and Use of the Information Collection**

The SARR provides state CSAs an opportunity to assess federal program requirements and to evaluate whether they are providing the required and best child support services possible. The SARRs are used by OCSE to:

* Pinpoint areas to prioritize attention for improvement in state child support programs
* Approve child support 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
1. **Use of Improved Information Technology and Burden Reduction**

OCSE developed the OCSE SARR 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 SARR is unique. It is the only method available for states to assess CSA 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 SARR information less frequently, or not at all, would violate federal laws and prevent OCSE from executing its oversight function of state child support 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 89 FR71905 on September 4, 2024. The notice announced that OCSE intends to seek OMB approval of the collection of information and provided a 60-day period for public comment. Listed below are the four comments received and the OCSE responses:

|  |  |  |
| --- | --- | --- |
|  | Comment Received | OCSE Response |
| 1 | A commenter indicated that the data is useful and is necessary to give a snapshot of the quality of work and compliance of the regulations. The commenter also noted that it would be useful if the report was in a fillable form or there were standard questions to answer. | OCSE appreciates the feedback and will take the suggestion into consideration as we explore future system enhancements.  |
| 2 | A commenter asked OCSE to strongly consider completely removing the State Self-Assessment Report as a requirement for each state’s annual submission. As an alternative, the commenter asked that the sample number of cases be reviewed and reduced and that we streamline the report.  | Thank you for your comments. We are unable to eliminate the requirement as it is mandated by law. Additionally, OCSE does not prescribe a specific number of cases for review, allowing states flexibility in determining appropriate sample sizes for their state self-assessments. |
| 3 | Another commenter suggested streamlining the report and removing some of the required data tables.  | OCSE appreciates the feedback and will take the suggestion into consideration as we explore future system enhancements. |
| 4 | A commenter indicated that the Self-Assessment Review and Report provides a valuable overview of how the program performs in federally mandated program areas. The commenter also indicated that their program 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 noncompliance notices to counties, researching rebuttals to noncompliance findings, and drafting the final report to OCSE.  | OCSE acknowledges and appreciates the feedback but at this time, since no other comments were received on this topic, no updates have been made. OCSE appreciates the feedback. |

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

 Not applicable.

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

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

**11. Justification for Sensitive Questions**

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

**12. Estimates of Annualized Burden Hours and Costs**

 ***Estimated Burden Hours***

In the currently approved information collection, the agency increased the hours based on workgroup comments and an agency review. During this process, outliers in the estimates were excluded, and the final burden estimate was derived from the remaining data to ensure accuracy and reliability.

***Estimated Cost to Respondents***

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 2024, which is $28.16 per hour. To account for fringe benefits and overhead, the rate was multiplied by two, which is $56.32. <https://www.bls.gov/oes/current/oes_stru.htm>

**Annual Burden and Cost Estimates**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| 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 Review and Report and Instructions | 54 | 1 | 8 | 432 | $56.32 | $24,330 |

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

 There are no additional costs for states to respond and submit the SARR.

**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 $27.49 per hour. To account for fringe benefits and overhead, the rate was multiplied by two, which is $54.98. Total estimated cost, therefore, is $57,179 (1,040 X $54.98).

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

The SARR form reflects a change in the contact information found in the Paperwork Reduction Act notice/display language.

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

Not applicable.

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

 Not applicable.

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

 Not applicable.