

State Court Improvement Program

**OMB Information Collection Request
0970 - 0307**

Supporting Statement Part A - Justification

November 2025

Type of Request: Revision

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

1. Circumstances Making the Collection of Information Necessary

The State Court Improvement Program (CIP) provides federal funding to state courts to assess their child welfare and judicial practices and develop and implement improvement plans. Two collections are necessary to properly administer the State CIP: an annual year-end self-assessment report with an updated strategic plan, both approved under this OMB number. This current request includes revisions for the following purposes:

- To bring the program into compliance with section 438 of the Social Security Act (SSA). The Supporting America's Children and Families Act, P.L. 118-258, was signed into law on Jan 4th. This law included provisions reauthorizing the CIP and amending the program. The key substantive change was adding language around improving court continuity in the face of public health or other emergencies. Fields on this topic have been expanded.
- A complete application is required from State courts every five years which includes the self-assessment and new strategic plan. Annually, the self-assessment should thoroughly be updated to reflect progress and challenges over the prior year. The strategic plan is to be written as a five-year plan which looks forward and is updated as needed annually. Because it is a high-level summary, and the two documents work in tandem, the primary burden annually is completing the more detailed self-assessment and updates to strategic plans are often minor notes that flow out of that review. These documents are required to monitor progress of the program according to statute.
- Both the self-assessment and strategic plan template were developed and modified over time with in-depth grantee involvement during reviews and technical assistance. The goal has been to design a process and tools that meet reporting requirements but also serve as helpful documents to grantees in conducting their work.

Authorizing legislation makes it clear that an application is required in order for State courts to receive CIP funding. A copy of the statute is attached with this submission for review. See attached document marked SSA Section 438.

2. Purpose and Use of the Information Collection

This data collection serves a number of related purposes:

- The collection provides information for annual approval of funding and oversight of compliance with the statute.
- The collection provides information for review by the CB and our technical assistance provider, the Center for Legal and Judicial Innovation and Advancement, to provide programmatic feedback and assistance to CIPs outside of any compliance issues that may be found.

- The collection is summarized across grantees and shared back with grantees which facilitates peer connections, national technical assistance, and a community of learning.

3. Use of Improved Information Technology and Burden Reduction

Only electronic submissions of the collections are accepted.

4. Efforts to Identify Duplication and Use of Similar Information

The information in these data collections reflect information that are generally only within the purview of CIP staff. Much of this information does not exist anywhere else. A number of questions about technical assistance were removed with the roll out of a new technical assistance provider that will be collecting similar data in the course of their work to prevent duplication and to lower burden.

5. Impact on Small Businesses or Other Small Entities

This collection should not impact small businesses and has been designed to minimize the burden on respondents.

6. Consequences of Collecting the Information Less Frequently

Applications are statutorily required. Absent applications, awards are not authorized and the program cannot continue to operate. The year-end self-assessment report is the primary form of accountability to ensure funds are being used in compliance with the statute. Self-assessment reports are necessary to demonstrate how grant funds have been used. Strategic plans provide a high-level overview of future activities that allow CB to provide support at key junctures.

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

There are no special circumstances associated with this collection.

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 9th, 2025 (90 FR 43450) and provided a sixty-day period for public comment.

During the notice and comment period, 3 comments were received, all from state offices familiar with the instruments. Regarding comments to the general PRA questions, there seemed to be a consensus and understanding of the dual purposes of the instruments. Two did suggest further streamlining would be welcome.

Regarding the two targeted topics described:

We highlighted a discussion on possibly adding additional questions about Title IV-E legal representation funding. This additional detail is not needed by CB for grant oversight, but is something CIPs have organically asked for further details on. One comment suggested this would not be burdensome, but it wouldn't be data they would likely use. Two noted they would welcome the additional data. One noted that general open-ended questions for additional context would not be burdensome, but if the questions were too granular it would be challenging because the responses would likely vary across counties. We made a small change to expand a prompt that had been in a parenthetical to a simple chart. See A15.

We highlighted that we could remove questions about training that were attached to optional project types that CB no longer needs for oversight because of a change in the statute, two comments suggested removing based on the cost/benefit. The third comment noted it had not been burdensome but they did not use the data from other states. Given the consensus, we removed those questions.

A number of efforts were made to consult with individuals outside the agency to develop and solicit input on these program requirements. Grantee feedback is sought informally during calls in the course of providing technical assistance and training for grantee new staff.

The below grantee technical assistance providers were involved in ongoing review of the information collection. These providers have extensive experience in court evaluation and high degrees of familiarity with the CIP:

- Dr. Alicia Summers, federal technical assistance provider
- Dr. Kristen Woodruff, federal technical assistance provider
- Dr. Andy Yost, federal technical assistance provider
- Zubair Siddiqi, Esq., federal technical assistance provider

9. Explanation of Any Payment or Gift to Respondents

No payment or gifts of any kind will be provided to respondents.

10. Assurance of Confidentiality Provided to Respondents

No such assurances are required by statute or policy for this program.

11. Justification for Sensitive Questions

No questions of a sensitive nature will be asked as a part of the collection.

12. Estimates of Annualized Burden Hours and Costs

Estimated Burden Hours

The estimated number of respondents is based reflects responses from the highest state court of every state, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands to respond. All 53 jurisdictions currently participate in the program. One response from each jurisdiction is anticipated.

The Self-Assessment is completed annually and takes about 40 hours total per year. The Strategic plan is submitted every 5 years, but jurisdictions spend minimal time updating relevant sections of the Strategic Plan in years when it is not due. This burden is reflected in the estimated time annually for the Self-Assessment.

Estimated Cost to Respondents

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Legal Support Workers, All Other 23-2099 and wage data from May 2024, which is \$41.45 per hour. To account for fringe benefits and overhead, the rate was multiplied by two which is \$82.90. Therefore, the total cost to respondents is estimated to be \$221,442.48213,108.3

<https://www.bls.gov/oes/2023/may/oes232099.htm>

Information Collection Title	Total Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Annual Self-Assessment	53	1	40	2,120	\$82.90	\$ \$175,748
Strategic Plan	53	.20*	52	551.2	\$82.90	\$45,694.48
Estimated Annual Burden and Cost Totals:				2,671.20	\$82.90	\$221,442.48

* The full Strategic Plan is completed every 5 years. In years when the Strategic Plan is not completed, respondents may spend minimal time updating relevant sections of the Strategic Plan. This is accounted for in the estimate for the Annual Self-Assessment.

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

There is no other annual cost burden to respondents.

14. Annualized Cost to the Federal Government

Review of the annual self-assessment typically takes the equivalent of one work day (8 hours). The reviews are conducted by CB Child Welfare Specialists within our regional offices. The average grade of specialists is 11. Average step 5. Average hourly wage accounting for locality is approximately \$34.30 per hour. Total number of hours $8 \times 53 = 424$. $424 \times \$30 = \$14,543.20$

Reviews in years where a new Strategic Plan is also due (once every 5 years) typically takes the equivalent of two work days (16 hours). $16 \times 53 = 848$ hours. $848 \times 34.30 = \$29,086.40$.

15. Explanation for Program Changes or Adjustments

Regarding updates to the self-assessment and strategic plan, a minor change was made early in 2025 to the self-assessment in response to Executive Orders, amounting to one optional topical box and a few drop-down categories being removed. These were already approved by OMB.

Additionally, as released with the Request for Public Comments, the following minor changes were proposed to the self-assessment. These do not impact estimated time to respond.

- Brief questions were added on IV-E funding, the self-assessment point of contact or publishing information, and additional collaborative partners.
- Dropdown categories have been added to reduce burden and improve data where 'other' was too often selected.
- Some questions about technical assistance states participated in were removed because alternative data sources were found that reduced burden.

Based on the consensus of the three comments received and a lack of a pattern of specific requests for this type of information, we have removed the training fields on all the optional projects.

There was some consensus that additional information on Title IV-E Legal Representation would be welcome. However, one comment emphasized that getting too granular would make the data collection burdensome because of county by county variations. Any aggregation would also likely be frustrated by the array of nuances in county level information. As such, simple open-ended questions were added.

No changes were made or are proposed to the strategic plan.

16. Plans for Tabulation and Publication and Project Time Schedule

Only the data from Self-Assessments are shared back with CIPs and publicly. The Strategic Plan information is used for technical assistance by CB and other technical assistance providers, but not published since the information is prospective. Data are published on a public Dashboard and in a report distributed directly to CIPs. There are no complex analytical aspects involved. Largely this involves percentages of states with projects by type. This is done under a technical assistance grant.

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.