

## THE SUPPORTING STATEMENT

The Office of Management and Budget (OMB) requires that for approval under the Paperwork Reduction Act a Supporting Statement must be prepared in the format specified below. Information in the Supporting Statement should be provided in a manner that is responsive to the OMB instructions, and each item must be identified using the numbering system given by OMB. If the Supporting Statement exceeds 10 single-spaced pages in length, there should be a summary not exceeding one page in length which precedes it.

Every effort should be made to keep the Supporting Statement to a length of 10-12 pages. When possible, detailed information should be placed in an attachment, which is then referenced in an appropriate place in the Supporting Statement so that interested reviewers can peruse it. Each attachment should be referenced in the text, so that a reviewer knows why it has been included and which portions may be of particular interest. Brevity and clarity with respect to both the text of the Supporting Statement and any attachments are highly desirable; only the information requested by the OMB outline and needed to understand the project should be included.

### General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must be entered in worksheet I. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. OMB reserves the right to require the submission of additional information with respect to any request for approval.

### Specific Instructions

- A. **Justification.** Requests for approval shall:
1. **Circumstances Making the collection of Information Necessary**

This supporting statement is for the Child and Family Services Plan (CFSP), Annual Progress and Services Report (APSR), the CFS-101, Parts I, II and III, and caseworker visit data. This information collection requirement incorporates many reporting requirements established by various statutes, as discussed below. Federal regulations implementing the CFSP, APSR, and CFS-101 are codified at 45 CFR 1357.15.

States, Territories, and Tribes are required to submit the CFSP, APSR, and CFS-101's in order to receive funding under title IV-B, subparts 1 and/or 2 (section 422 of title IV-B, subpart 1 [42 U.S.C. 622] and section 432 of title IV-B, subpart 2 [42 U.S.C. 629b] of the Social Security Act (the Act,) respectively.)

A new title IV-B reporting requirement for States, established by The Child and Family Services Act of 2006 (P.L.109-288, codified at section 424(e) of the Act,) requires States to collect and report caseworker visit data for children under the care and responsibility of the State. The legislation requires States to report (1) the percentage of children in foster care under the responsibility of the State who were visited on a monthly basis by the caseworker handling the case of the child; and (2) the percentage of the visits that occurred in the residence of the child. States are also required to establish annual targets for each fiscal year and to outline the steps to be taken to ensure, by October 1, 2011, that 90 percent of children are visited on a monthly basis and that they majority of visits occur in the child's home.

States that receive funding through the Child Abuse Prevention and Treatment Act (CAPTA) Chafee Foster Care Independence Program (CFCIP), and/or the Chafee Education and Training Vouchers (ETV) have additional reporting requirements that are incorporated into the CFSP, APSR, and CFS-101's to ease the collection burden on States. Tribes are not eligible to receive funding under the CAPTA, CFCIP, and ETV programs and, therefore, do not have to meet these reporting requirements.

States that receive funding through the CAPTA State grant program for child abuse and neglect prevention and treatment services are required to submit a CAPTA State Program Plan every five years (section 106(b)(1) of the CAPTA, as amended [42 U.S.C. 5101 et seq.]. The statute

mandates that the CAPTA plan be coordinated "to the maximum extent practicable" with the title IV-B State Plan (section 106(b)(2) of the CAPTA, as amended).

In addition, Section 477 of title IV-E of the Social Security Act [42 U.S.C. 677], authorizing the CFCIP and ETV, requires the submission of a State program plan every five years describing how the State intends to "design and deliver programs to achieve the purposes of the section" (Section 477(b) of the Act).

In order to help States plan comprehensively for the full array of child welfare services and minimize the collection burden on the States, States are required to report on the progress in achieving stated goals and service delivery under title IV-B, CAPTA, CFCIP, and ETV in the CFSP and APSR (45 CFR 1355.15(a)). The CFSP and the CAPTA plans were consolidated in FY 2000 and the Chafee Foster Care Independence Program (CFCIP) was incorporated in the CFSP beginning in FY 2001. ETV was added in FY 2004. The caseworker visit data requirement was added this year. The Children's Bureau believes this approach reduces the burden on the State by allowing the State to submit one plan and to submit all plans on the same schedule. This approach encourages comprehensive planning and service delivery to children being served by the State's child welfare system. Attached are all applicable Federal statute and regulations.

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

The CFSP and APSR are designed to guide the improvement of States' and Tribes' child welfare services, as well as to provide a single reporting mechanism for the many Federal program areas. States and Tribes submit a CFSP once every five years and the APSR in each of the interim years. The CFS-101's are submitted every year, as required. The CFSP contains the goals and objectives that States and Tribes intend to achieve during the five years and a strategic plan with tasks for each year. The CFSP also provides an update on the current year and acts as a final report for the previous five year period. The APSR provides updates on the progress the State or Tribe is making in meeting its goals and objectives and details any necessary changes to the plan for the next fiscal year. States are also required to outline in the APSR targets for improvement

relating to caseworker visits and the steps to be taken to ensure, by October 1, 2011, that 90 percent of children are visited on a monthly basis and that they majority of visits occur in the child's home

States and Tribes must submit a CFSP/APSR with all applicable requirements met in order to receive funding under title IV-B, subparts 1 and/or 2. In addition, States' CFSP/APSR must include CAPTA, CFCIP, and ETV reporting requirements in order to receive funding under those program areas. Also, States must meet the caseworker visit reporting requirements in order to receive the full 75 percent Federal match available under title IV-B, subpart 1. However, funding for one program area is not impacted by the approval or disapproval of the plan for the other programs.

The CFSP and APSR are also used by agencies, organizations, and others with whom the State and the Tribes coordinate services to achieve goals and objectives in the plan. The Children's Bureau Regional Offices use the information as a basis for providing support and technical assistance to States and Tribes. The caseworker visit data is a required component of an Annual Child Welfare Outcomes report to Congress (section 479A(5) of the Act).

The ACF grants management office uses the CFS-101's to track and allocate funding to States and Tribes. The CFS-101, Part I is the annual budget request for all program areas. States and Tribes may also use this form to request additional funds or to return unneeded portions of its allocation, which is then re-allocated to other grantees. The CFS-101, Part II is a summary of the estimated expenditures from each program area for each service or activity, as well as the projected number, population, and geographical areas to be served with the upcoming year's budget request. The CFS-101, Part III is an annual summary of the States' estimated and actual expenditures for the most recently completed fiscal year. The form also includes estimated number, population, and geographical areas served for the completed fiscal year. ACF is required to compile the CFS-101 reports and to submit the compilation to the Congress each year (section 432(c) of the Act).

The Children's Bureau also responds to requests for information from the Government Accountability Office (GAO), Congress, and others entities on the types of services States and

Tribes are providing, the amount of funds they are expending in various areas, and on the type of initiatives they are implemented using title IV-B, CAPTA, CFCIP, and ETV funds.

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

The Children's Bureau allows the States and Tribes to submit the CFSP/APSR in the electronic format of their choice (e.g. Word or PDF file); however, it must be electronic. The CFS-101 portion of the submission requires a signed paper copy with signature and must be submitted in hardcopy. In collecting the caseworker visit data, States with an automated case management system were encouraged to pull data directly from the database when feasible. Overall, there is no automated collection technique possible as the majority of the information collected in the CFSP/APSR is narrative text.

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

The CFSP consolidates the reporting requirements of title IV-B, subparts 1 and 2, CAPTA, CFCIP, and ETV into one document and one reporting cycle, reducing the duplication of data collection efforts. There are similarities between Child and Family Service Review (CFSR) processes including assessment information collected, caseworker visit data, and requirements for coordination with stakeholders. In order to avoid redundant reporting, States are encouraged to use the information required by the CFSR in the CFSP, where appropriate. This is not a concern for Tribes as they are not required to participate in the CFSR.

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

The collection of information is restricted to States and Tribes as only States and Tribes are eligible to apply for Federal funds under these program areas. This information collection requirement has been held to the absolute minimum required to meet the statutory and regulatory requirements to receive

funding under title IV-B, CAPTA, CFCIP, and ETV. In addition, for information collection from Tribes, ACF has waived certain requirements and reduced the scope of other title IV-B reporting requirements in order to minimize the burden. (See 45 CFR 1357.15, 1357.40, and 1357.50 for more information.)

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

The submission of the CFSP, APSR, and CFS-101's are required prior to awarding Federal funding as mandated by statute and regulation. If the collection is not conducted or conducted less frequently, the consequence to Federal program or policy activities is that funds would not be able to be awarded to States and Tribes. Without funds, States and Tribes would not be able to provide needed services to the populations, as required by law. This collection burden can only be eliminated as a result of a legislative change.

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

There are no special circumstances required in the collection of this information in a manner other than required by OMB.

## **8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency**

ACF published a notice in the Federal Register according to the requirements in 5 CFR 1320.8(d) on January 9, 2008. A copy of that notice is attached. No comments were received by the Children's Bureau. ACF published the second notice in the Federal Register on March 17, 2008. We received one comment pertaining to the prohibition of undocumented aliens' eligibility for public assistance funds. This comment is outside of the parameters of this information collection requirement.

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

No payment or gifts will be provided to any respondents.

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

Data and information in the applications are not confidential. States and Tribes are to make public both the CFSP and APSR (45 CFR 1357.15(v)). The CFS-101's and the caseworker visit data are required to be included in reports to Congress (section 432(c) and section 479A(5) of the Act, respectively.)

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

There are no questions of a sensitive nature in the application requirements.

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

#### **ANNUAL BURDEN ESTIMATES**

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours (per year)
CFSP 275	1	110.25	30,320/ 5 years =	6,064
APSR 275	1	74.58		20,510
CFS-101, Parts I, II, and III	275	1	4.38	1,205
Caseworker Visits	52	1	99.33	5,165
Estimated Total Annual Burden Hours:				32,944

The information collection burden hours listed above are estimates. The CFSP is submitted once every five years therefore, the total CFSP hour burden is divided by five. The APSR, the CFS-101, and the caseworker visit data are submitted annually. The estimated information collection burden is based on the estimated time that States and Tribes need to complete the reporting requirements multiplied by the number of States and Tribes eligible to receive funding under the different program areas.

The burden estimates are based on consultation with State and Tribal respondents of various sizes. The Children's Bureau Regional Offices, which work closely with States and Tribes in

completing their reports, were also consulted in developing the cost burden. In order to accurately estimate the caseworker visit data, the Children's Bureau included State respondents with varying levels of case management information system automation.

The estimated total annual cost of the CFSP is \$181,920 (6,064 hours at \$30/hour.) The estimated total annual cost of the APSR is \$615,300 (20,510 hours at \$30/hour.) The estimated total annual cost of the CFS-101 is \$36,150 (1,205 hours at \$30/hour.) The estimated total annual cost of the caseworker visit data is \$154,950 (5,165 hours at \$30/hour.)

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

There is no annual cost burden associated with these information collection instruments.

### **14. Annualized Cost to the Federal Government**

**There are no additional costs to the Federal government.**

### **15. Explanation of Program Changes or Adjustments**

This annual burden estimate reflects a decrease from what was previously reported. Although, the additional burden associated with caseworker visit data is categorized as a program change resulting from new legislation, as discussed above, the overall hour burden has decreased from the previous submission.

The overall hour burden decrease can be categorized as an adjustment. The total burden hours decreased due to an improved estimate of State and Tribe burden hours. In previous submissions, the CFSP hour burden was calculated using the same estimated burden hours per response for both States and Tribes. In this year's calculation, we distinguish between the Tribes at 80 hours and the States at 240 hours. The decreasing burden also reflects the increased proficiency of respondents in meeting these reporting requirements. This hour burden estimate more accurately reflects the actual burden on respondents.

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

Most information collected is not published by the Federal government. Basic tabulations will be conducted on the caseworker visit data for the Annual Child Welfare Outcomes Report to Congress. There is no end date for the collection of data.

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

The Department will display the expiration date on the Program Instruction to the States and Tribes describing the information collection requirements. The expiration date will also appear on the CFS-101 forms.

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

There are no exceptions to the certification statement.

**B. Collections of Information Employing Statistical Methods**

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When item 16 is checked "Yes," the following documentation should be included in the supporting statement to the extent that it applies to the methods proposed:

1. Describe (including numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households or persons) in the universe covered by the collection and in the corresponding sample are to be

provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

2. Describe the procedures for the collection of information including:
  - . Statistical methodology for stratification and sample selection,
  - . Estimation procedure,
  - . Degree of accuracy needed for the purpose described in the justification,
  - . Unusual problems requiring specialized sampling procedures, and
  - . Any use of periodic (less frequent than annual) data collection cycles to reduce burden.
3. Describe methods to maximize response rates and to deal with issues of nonresponse. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.
4. Describe any tests of procedures or methods to be undertaken.

Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for

collection of identical information from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.