

THE SUPPORTING STATEMENT

Specific Instructions

Please do not remove or alter the headings below

A. Justification

1. Circumstances Making the Collection of Information Necessary

The requirement for submission of a state plan and plan amendments for the Child Support Enforcement program is found in legislation at sections 452, 454 and 466 of the Social Security Act (the Act). These sections are implemented by regulations at 45 CFR 301, 302, 303, 305, 307 and 308. States and territories are provided with instructions for completing the state plan and plan amendments in OCSE-AT-00-10.

The Office of Child Support Enforcement (OCSE) has approved a IV-D state plan for each state and territory. Attachment includes the current state plan table of contents and a transmittal form, which states and territories send in with each state plan amendment. Federal regulations require states and territories to amend their state plans only when necessary to reflect new or revised federal statutes or regulations or material change in any state law, organization, policy, or IV-D agency operations. The Office of Management and Budget (OMB) approved the IV-D State plan Form OCSE-100. All states have had IV-D plans in place for years. Plans that are submitted now are normally specific preprint pages that are required by changes in state laws or processes, or required by federal law, regulations, or policies.

We request approval of an extension of a currently approved collection.

According to 45 CFR 301.13, "After approval of the original plan by the Office, all relevant changes, required by new statutes, rules, regulations, interpretations, and court decisions, are required to be submitted currently so that the Office may determine whether the plan continues to meet Federal requirements and policies." States and Territories submit, on average, four state plan preprint pages and four transmittals annually to notify OCSE of relevant changes required by new state statutes, rules, interpretations and court decisions.

2. Purpose and Use of the Information Collection

The information collected on the state plan pages is necessary to enable OCSE to determine whether each state and territory has a IV-D state plan that meets the requirements in Title IV-D of the Act and implementing regulations. The State plan preprint page gives each state a convenient method for developing a statement to be submitted to OCSE for approval describing the nature and scope of its program and giving assurances that the program is administered in

conformity with the requirements in Title IV-D of the Act and the implementing regulations at 45 CFR Chapter III. The state plan is analogous to a state having a contract with OCSE in that it outlines the activities the state will perform as required by law in consideration for receiving federal funds to meet the costs of these activities. In this sense, the state plan is the basis for making federal funding available to the states in the costs of operating the Child Support Enforcement program.

3. Use of Improved Information Technology and Burden Reduction

Overall, the collection of information does not involve the use of automated, electronic, mechanical or other technical collection techniques or other forms of information technology at this time; however, states are able to submit a list of links to state laws instead of submitting a hard copy of the actual document. In addition, the documents are available upon request, and on the OCSE program's website. OCSE is still in the process of drafting an efficiency regulation that will allow the acceptance of electronic signatures. We are hopeful that we will be able to move towards a fully electronic state plan submission process.

4. Efforts to Identify Duplication and Use of Similar Information

The collection of information requirements contained in this form does not duplicate any other reporting or recordkeeping requirements.

5. Impact on Small Businesses or Other Small Entities

The collection of information requirements does not involve small businesses or entities.

6. Consequences of Collecting the Information Less Frequently

States and territories will, for the most part, submit state plan preprint pages to OCSE on a one-time only basis to reflect new federal requirements. In addition, states and territories will periodically amend their state plans to reflect any material change in state laws, organization, policy, or IV-D agency operation.

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

The collection of information does not involve any special circumstances.

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

The comments received in response to the Federal Register Notice centered around making the submission, amendment, and approval of state plan preprint pages and attachments electronic; including making the preprint pages accessible online. The 60 day notice was published 1/14/2014, Vol. 79, page 2445.

The following comments were received:

- **Comment:** We continue to encourage OCSE to explore ways to modernize the State Plan submission and approval process by allowing electronic submission and approval.

Maintaining and updating the State Plan remains a manual and paper intensive process for both OCSE and state child support enforcement agencies. For each State Plan update or amendment, states must submit a paper copy of the relevant preprinted State Plan page, accompanied by the transmittal and notice of approval form (OCSE-21-U4) with an original authorized signature. OCSE regional staff then type or stamp an approval date on the form and plan page, sign it, and return a copy to the state IV-D agency. The state maintains a hard copy of the State Plan and manually updates it by inserting new plan pages and removing outdated ones. We believe OCSE regional staff do the same. In Massachusetts, we now maintain a PDF copy of our State Plan, but this file also needs to be updated by replacing pages every time the plan is amended or updated.

OCSE could update the State Plan process by establishing an online process for states to submit State Plan changes and for OCSE to approve them. The preprinted plan pages lend themselves to such a process since they are the same for every state, with some variation when a page provides for state options. State Plans, or at least the preprinted pages, could then also be available to the public online. An alternate, interim step would be for OCSE to accept plan pages as a PDF attachment to an email.

Response: OCSE is in the process of drafting an efficiency regulation that will allow the acceptance of electronic signatures. We are hopeful that we will be able to move towards a fully electronic state plan submission process.

- **Comment:** The State of Oregon Title IV-D Program (Oregon Child Support Program) offers very minor comments:
We support electronic, easy-to-amend state plans.
We would support auto-population (e.g., when we type “Oregon” at the top of page 1, all subsequent pages would be populated).

We would like to see a revised view that displays the state's prior submission alongside the current year. If nothing has changed, it's easier than looking elsewhere to confirm the information. If there is a federal-level change, that should be indicated as well.

Response: OCSE is in the process of drafting an efficiency regulation that will allow the acceptance of electronic signatures. We are hopeful that we will be able to move towards a fully electronic state plan submission process.

- **Comment:** The California Department of Child Support Services (DCSS) notes that ACF has estimated the annual burden for preparing and submitting state plan updates to be 162 hours. This estimation is in line with a mid-range of changes when necessary to reflect new or revised federal and/or state statutes or regulations. However, the estimated total annual burden hours of 162 would not be accurate when including updates to Section 3.1, Cooperative Agreements. Quarterly and annual submissions of these Agreements are time consuming. If quarterly and annual submissions were to continue for Section 3.1, Cooperative Agreements, the total annual burden hours would need to be increased 80 to 100 hours.

Recommendation

In an effort to minimize the burden of the collection of information on State IV-D Agencies, DCSS suggests the State Plan be updated once per federal fiscal year. California makes significant changes to its entire list of cooperative agreements at the county level and at the state level once per year. Changes that occur during the federal fiscal quarters are minimal and are in the form of counties changing the beginning and end dates of a specific cooperative agreement or deleting or adding a vendor. Minimal changes, as referenced, do not affect the performance or function of the child support agency and can be provided to our regional office with an annual submittal of updates to Section 3.1, Cooperative Agreements.

Many cooperative agreements expire at the end of the state fiscal year (June 30th). Therefore, changes made within the state fiscal year could be reported in an annual submission. Annual submissions can be either the end of the state fiscal year (June 30th) or the end of the federal fiscal year (September 30th).

Additionally, electronic submission of collected information would ease the annual burden hours in addition to storage of reference materials and postage.

Response: The estimate is the amount of time needed to complete and submit the preprint page or transmittal. We have taken into consideration the fact that some states may have to resubmit preprint pages based on state- specific changes, which may not impact other states. As a result, this estimate of burden hours is the average amount of pages we feel states may submit.

9. Explanation of Any Payment or Gift to Respondents

No payment or gift is provided to respondents, other than remuneration of contractors or

grantees.

10. Assurance of Confidentiality Provided to Respondents

We do not assure confidentiality of the information collected.

11. Justification for Sensitive Questions

The required information collection does not involve asking questions of a sensitive nature.

12. (a) Estimates of Annualized Burden Hours and Costs

The estimate of burden to respondents is based on the following assumptions:

- The 54 respondents include all State and Territories participating in the Child Support Enforcement program: the 50 States, the District of Columbia, Guam, Puerto Rico and the U.S. Virgin Islands.
- Over the past three years, states were required to submit a total of eleven state plan preprint pages, an average of approximately three per year. In addition, states may submit other preprint pages as a result of changes in state regulations, policies, and/or procedures. Recent regulation required states to submit a state plan for Reporting the State Directory of New Hires. As a result, it is estimated that states will submit 4 state plan preprint pages annually. All states have had complete state plans in place for many years; however, changes in state or federal laws, regulations, and/or policies may require states to resubmit certain preprint pages.
- A state plan transmittal (OCSE-21-U4) will be submitted with each state plan preprint page.

Instrument	Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours
State Plan (OCSE-100)	54	4	.5 hours	108 hours
State Plan Transmittal (OCSE-21-U4)	54	4	.25 hours	54 hours
Total			.75	162 hours

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12. (b) Respondents' Cost for Hour Burden

The estimate of costs to respondents is \$18 per hour times 162 hours = \$2,916.

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

There are no additional direct costs to respondents.

14 Annualized Cost to the Federal Government

The annualized costs to the Federal Government for the hour burdens are based on an average wage rate of \$23 per hour for Federal level employees who review submitted State plan pages from respondents. Estimates regarding the hours spent processing each State plan submission (0.5 hours for State Plan and 0.25 hours for State Plan Transmittal) were determined by past employees' experiences in reviewing State plan pages in OCSE.

Instrument	OCSE's Administrative Costs	Respondent Reimbursement Cost (66% of Total Annualized Cost)	Administrative Cost Plus Respondent Reimbursement Cost
State Plan (OCSE-100)	\$2,484	\$1,283	\$3,767
State Plan Transmittal (OCSE-21-U4)	\$1,242	\$642	\$1,884
Total	\$3,726	\$1,925	\$5,651

15 Explanation for Program Changes or Adjustments

There were fewer page changes submitted than in prior years.

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

There are no exceptions to the certification statement.

B. Statistical Methods (used for collection of information employing statistical methods)

The information collection requirements outlined in this report do not employ the use of statistical methods.