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

OCSE Request:

The Department specifically requests comments on (a) whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the accuracy of the agency's estimate of the burden of the proposed collection of information; (c) the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology. Consideration will be given to comments and suggestions submitted within 60 days of this publication.

Response:

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 indepth 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.

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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.