

November 4, 2024

RE: Open Comment Period, State Self-Assessment Report (per ACF-OCSS-DCL-24-11)

Dear Office of Child Support Services,

This letter is in response to your request for comments on the State Self-Assessment Report.

We support the changes to this State Self-Assessment Report template. The minimal changes made by OCSS limit the impact on state child support agencies. The approaches used in preparation of the data vary among states. While some states manually audit cases, other states have automated means of gathering the data needed for this report. The impact of more significant changes to the report could require states with automated approaches to invest in costly system changes to meet any new data collection or change in criteria. States without automated approaches would still be impacted by more complex changes. Those states would need to identify new auditing methodologies and train staff to follow those new procedures.

One opportunity to streamline the report is found in Tables A1 (in "I. Executive Summary") and A2 (in "III. Self-Assessment Results"). Since the same data displays in both tables, it is redundant to include both tables in the report. We recommend removing Table A1 and replacing it with a brief statement of which criteria were met and not met during the federal fiscal year.

Thank you for the opportunity to comment.

Sincerely,

Kylie Claycomb, Director lowa Child Support Services