



# Judicial Council of California

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November 7, 2025

Mary C. Jones  
ACF/OPRE Certifying Officer  
Department of Health and Human Services  
Administration for Children and Families

RE: Request for public comments on a 3-year extension of the State Court Improvement Program (SCIP) Strategic Plan Template and Annual Self-Assessment (Office of Management and Budget (OMB) #0970-0307, expiration February 28, 2026)

Dear Ms. Jones:

The California Court Improvement Program (CIP) is submitting the following comments in response to: Proposed Information Collection Activity; State Court Improvement Program.

First, California CIP comments on the proposed information collection activity:

- (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; (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.

With regards to (a), California CIP agrees that the proposed collection of information is necessary for proper performance of the functions of the agency. Regarding (b), California CIP believes the agency's estimate of the burden of the proposed collection of

information is accurate for non-application years, but for application years when a new strategic plan is required, consideration should be given for the additional time it takes to evaluate its plan and make significant changes. With regards to (d), California CIP prefers an option that keeps the ability to submit information in a report style format.

Next, the California's CIP comments on this section highlight:

(e) Regarding IV-E legal representation funding, in addition to asking an open-ended question about this topic in the Self-Assessment, would additional data elements around type of attorneys funded (e.g., agency, kin) or type of cases (e.g., only in foster care, in other civil matters) be useful? These data are not needed for SCIP application approval by CB but could be compiled and shared back with grantees to support peer learning and connections. From your cost/benefit vantage, would this be worth including?

California CIP is willing to contribute available information that would be value added to the program but would caution against collecting extraneous information that would not meet the intended purpose and should consider limitations due to incompleteness or statistical validity. For example, California appoints counsel for parents and children only after a petition has been filed; in addition, there are 58 counties with different models of court appointed counsel representation including panel attorneys, solo practitioners, nonprofit, and for-profit law firms. It may be impracticable to detail this information for all 58 counties. This information may only be available for about 20 counties where the CIP program is involved with contracting.

And finally, California's CIP comments on the following section:

(f) Under section II of the Self-Assessment, for the optional project areas, each has a box on any training associated with the projects that includes more granular information such as the number of attendees, mode of delivery, and evaluation. This level of detail was formerly useful for CB in reviewing for grant compliance when there were three separate SCIP grants, one of which was for training. With the statutory merger of the SCIP grants, this level of detail is no longer needed for CB for grant compliance. These data can still be organized to share back with grantees to support peer learning and connections. From your cost/benefit vantage, would this be worth keeping or should we remove that level of detail?

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California CIP will defer to our federal partners on how information regarding CIP trainings should be reported. However, if it is not needed, then any streamlining of reporting is appreciated.

Sincerely,



Sarah Davis  
Director  
Center for Families, Children & the Courts  
Judicial Council

SD/ms

cc: Audrey Fancy, Principal Managing Attorney, Center for Families, Children & the Courts, Judicial Council; Court Improvement Director  
Marymichael Smrdeli, Attorney, Center for Families, Children & the Courts, Judicial Council