

CIP Application - Feedback

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;

- We question whether the proposed collection of information is necessary for the proper performance of the agency.
- It seems the information has more practical utility for Court Improvement Programs (CIPs) to help guide their work and as a source of data to support community learning and peer connections. While it can inform technical assistance and support reporting to Congress, we wonder how often the agency engages in technical assistance and reporting to Congress and whether it is necessary to their functioning.
- We are not sure what practical utility the proposed collection of information has (in its full proposed form) for the agency and wonder whether a more simplified version could meet what is necessary for the agency to perform its functions.

(b) the accuracy of the agency's estimate of the burden of the proposed collection of information;

- The annual burden estimates seem low. The annual self-assessment response estimate is closer to accurate than the strategic planning one (in years when a new strategic plan is required), but historically our CIP has put more hours into each of those pieces of the application than what the estimates show by at least 10 hours for the Self-Assessment and 20 hours for the Strategic Plan.

(c) the quality, utility, and clarity of the information to be collected;

- Training information seems to appear in multiple spots. For example, in Section I of the Self-Assessment, it asks about training as part of the solution for each of the three required projects (Hearing Quality, Quality Legal Representation, and Joint Project with the Agency). If training is part of the solution, CIPs are prompted to provide a name and title of the training. To align with the proposed changes to Section II of the Self-Assessment, that level of detail could be removed. It seems like that level of detail was formerly useful for the Children's Bureau in reviewing for grant compliance when there were three separate CIP grants, one of which was for

training. With the statutory merger of the CIP grants, we question whether this level of detail is needed for the Children's Bureau for grant compliance.

- Section III of the Self-Assessment (regarding CIP collaboration with the agency on the CFSP/APSR and CFSR/PIP seems like it carries the most in terms of quality, utility, and clarity.

(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.

- A document assembly program (like [Odyssey's Guide & File](#)) could minimize the burden of the collection of information on respondents.
- We wonder if an electronic tool like that could be used as part of this process, especially since many states are using them as part of their court process.

(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? And;

- From our cost/benefit vantage, yes, this information would be worth including for purposes of sharing it back with grantees to support peer learning and connections. It's still a relatively new and growing area. CIPs doing it are proud of the work they are doing and eager to share and learn more.
- It may also be helpful to collect data about whether training and administrative expenses are being reimbursed – and whether that is coming through the CIP or another entity.

(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?

- From our cost/benefit vantage, this information would not be worth keeping. The Children's Bureau could remove that level of detail.