

## **SUPPORTING STATEMENT**

### **JUSTIFICATION FOR INFORMATION COLLECTION**

Supporting Statement for the Child Care and Development Fund financial report form for Tribes (ACF-696T).

#### **A. JUSTIFICATION**

##### **1. Circumstances Making the Collection of Information Necessary**

The Child Care and Development Fund (CCDF) annual financial reporting form (ACF-696T) provides a mechanism for Indian Tribes to report expenditures under the CCDF program. The CCDF program provides funds to Tribes, as well as States and Territories, to assist low-income families in obtaining child care so that they can work or attend training/education, and to improve the quality of care. The program is authorized by the Child Care and Development Block Grant (CCDBG) Act, as amended (42 USC 9858).

Section 6580(c)(2)(C) of the Act requires Tribes to make reports on programs and activities as required by the Secretary of Health and Human Services. Implementing regulations at 45 CFR 98.65(g) indicates that the Secretary shall require financial reports as necessary. The financial reporting form is also used to collect information necessary to reallocate any unobligated Discretionary Funds to other Tribes in accordance with 45 CFR 98.64(d) and 6580(e) of the CCDBG Act.

##### **2. Purpose and Use of the Information Collection**

Information collected on an annual basis via the ACF-696T allows ACF to monitor expenditures and to estimate outlays and may be used to prepare ACF budget submissions to Congress. More specifically, the form provides information about the amount of CCDF funds obligated and liquidated by each Tribe, as well as information about the use of the funds (e.g. administration, direct services, construction and renovation). Failure to collect this data would seriously compromise ACF's ability to monitor expenditures. In addition, the form is used to collect information necessary to reallocate unobligated funds to Tribes.

This latest version of the ACF-696T form is substantially the same as the currently-approved version. We replaced the term “earmarks” with “targeted funds” to better represent the nature of those funds. In the instructions, we added a few points of clarification; for example, we provided more explanation of the requirement to spend targeted funds on child care resource and referral and school-age care.

##### **3. Use of Improved Information Technology and Burden Reduction**

The ACF-696T form is included in ACF's forms database—the Online Data Collection System (OLDC)—that allows Tribes to submit the form electronically over the

Internet. OLDC contains edits that automatically sum total amounts and check for common errors.

4. Efforts to Identify Duplication and Use of Similar Information

Information collected in this report is/will not be available through any other Federal source. No similar information is available.

5. Impact on Small Businesses or Other Small Entities

This information collection will not have a significant economic impact on a substantial number of small entities. The information being required has been held to the absolute minimum required for the intended use.

6. Consequences of Collecting the Information Less Frequently

This information collection will be on an annual basis. Financial management of the program would be seriously compromised if the expenditure data in the form were collected on a less than annual basis. Federal policy presumes the strictest controls on funding requirements and this necessitates annual review of documentation in support of Tribal claims for expenditures.

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

No special circumstances are noted for this request for information collection.

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

ACF's notice soliciting comments on the information collection was published in the Federal Register on September 4, 2007 at 72 FR 50683. The Child Care Bureau distributed the Federal Register notice to ACF Regional Offices. A number of Regional Offices shared the notice with Tribal Lead Agencies. In response to the Federal Register notice, ACF received one comment from the public. The comment was from a Tribal CCDF grantee who requested training on the Online Data Collection System (OLDC) used for electronic submittal of the ACF-696T form. The Administration for Children and Families will continue to provide resources and assistance with use of the OLDC. We did not receive any comments that addressed the content or substance of the information collection, or the cost and hour burden. Although response to the Federal Register notice was limited, the Child Care Bureau has gathered input and feedback from Indian Tribes and ACF Regional Offices over the nearly nine years that the ACF-696T has been used. Meetings with Tribal grantees, ACF Regional Office trainings, and other forums have been used to solicit feedback. The form works well and provides an established mechanism for reporting tribal CCDF expenditures. The second Federal Register notice was published December 5, 2007 at 72 FR 68586.

9. Explanation of Any Payment or Gift to Respondents

No payments or gifts are provided to respondents.

10. Assurance of Confidentiality Provided to Respondents

There is nothing of a confidential nature in the information collection. No assurance of confidentiality will be provided to respondents.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

The public reporting burden for this collection of information is estimated to average 8 hours per response. This estimate includes the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information.

The estimate of the reporting burden for this information collection is:

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	HOURS PER RESPONSE	RESPONSE BURDEN
ACF-696T CCDF Financial Reporting Form for Tribes	232	1	8	1856

Estimated Total Annual Burden Hours: 1856

The burden was estimated based on experience with prior activities and nine years of experience with the ACF-696T.

The annual cost per grantee is estimated at \$144 (8 total hours x \$18 per hour). This would result in an estimated annual cost for all respondents of \$33,408.

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

There are no direct, marginal monetary costs to respondents other than their time to complete the application.

14. Annualized Cost to the Federal Government

The annual cost to the Federal government is estimated at \$33,800. This is based on submission of 232 completed forms, requiring approximately 1300 professional

staff hours at an average of \$25 per hour (\$32,500); 100 clerical staff hours at an average of \$12 per hour (\$1200); and reproduction and mailing fees of approximately \$100.

15. Explanation of Program Changes or Adjustments

The estimated burden hours (1856) represent a 116 hour increase from the burden estimate of the previous information collection. This adjustment recognizes that participation in the Online Data Collection (OLDC) System used to electronically submit the ACF-696T form requires a registration process and training in order to use the system.

16. Plans for Tabulation and Publication and Project Time Schedule

There is no plan to publish information collected as a result of this form.

17. Display of OMB-Approval Expiration Date

The information collection will display the expiration date for the OMB-Approval.

18. Exceptions to Certification for Paperwork Reduction Act Submission

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

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