

## **SUPPORTING STATEMENT**

### **JUSTIFICATION FOR INFORMATION COLLECTION**

Supporting Statement for the Tribal TANF report form (ACF-196T).

#### **A. JUSTIFICATION**

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

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Pub. L. 104-193 (PRWORA), made sweeping changes to national welfare policy and placed new emphasis on the goal of work and personal responsibility. PRWORA gave federally recognized American Indian tribes the option to administer their own TANF (Temporary Assistance to Needy Families) programs either individually or as part of a consortium, an option they did not have in the past. This program is authorized in section 412 of the Social Security Act.

Section 412(h) of the Act requires Tribes receiving TANF grants to make reports on programs and activities as required by the Secretary of Health and Human Services. Implementing regulations at 45 CFR 286.245 and 286.255 require quarterly reports. The Tribal TANF financial reporting form (ACF-196T) provides a mechanism for Indian Tribes to submit those reports under the TANF program. .

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

The information collected provides specific data regarding claims and provides a mechanism to request grant awards. Failure to collect this data would seriously compromise ACF's ability to monitor expenditures. This information is also used to estimate outlays and may be used to prepare ACF requirement for budget submissions to Congress.

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

ACF has developed a 'forms' database -- the Online Data Collection system (OLDC) -- that allows authorized users to electronically enter data for the ACF-196T over the internet. OLDC contains edits that automatically sum total amounts and check for arithmetic errors. In addition, an electronic copy of the ACF-196T form is available via the internet and, upon request, via a diskette or e-mail attachment.

##### **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

Current regulations at 45 CFR 286.245 require this information collection be collected on a quarterly basis. Financial management of the program would not be compromised if the expenditure data in the form were collected on an annual basis. Recommendation will be made to change the regulatory requirement from quarterly to annual.

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 May 15, 2007 at 72 FR 27319. The Administration for Children and Families distributed the Federal Register notice to ACF Regional Offices for comments and requested that they share it with their Tribal TANF grantees. Although we did not receive any comments to the FR, comments received to ACF's previous attempt to implement a Tribal expenditure report form (ACF-196TT) in FY 2004 suggested the development of a report form that "mirrors" the Department of Interior's financial report (Financial Report 12g) found in OMB Control No. 1076-0135. This new form (ACF-196T) mirrors the data elements requested on the DOI form.

The second notice was published on November 6, 2007 at 72 FR 62651. ACF regional offices were informed of the second notice. ACF Regional Offices have ongoing discussions with Tribes about the ACF-196T and financial reporting requirements. ACF did not receive comments to the second notice.

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 1.5 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-196T Tribal TANF Financial Reporting Form	56	4	1.5	336

Estimated Total Annual Burden Hours: 336

Burden hour estimates were made using past experience with other approved form.

The annual cost per grantee is estimated at \$108 (6 total hours x \$18 per hour). This would result in an estimated annual cost for all respondents of \$6,048.

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

There are no other annual cost burden to respondents and record keepers.

14. Annualized Cost to the Federal Government

The annual cost to the Federal government is estimated at \$31,300. This is based on submission of 224 completed forms, requiring approximately 1200 professional staff hours at an average of \$25 per hour (\$30,000); 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 336 burden hours are new hours and 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.**