

THE SUPPORTING STATEMENT

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The Social Services Block Grant (SSBG) program provides funds to States, the District of Columbia, Guam, Puerto Rico, American Samoa, the Virgin Islands, and the Commonwealth of the Northern Mariana Islands (hereinafter referred to as States) to support social services for adults and children in support of five statutory goals (42 U.S.C §1397). Funds are allocated to the States, on the basis of population, as block grants for the administration of their social services programs.

Within specific legal limitations (42 U.S.C. 1397d), States have substantial discretion in the use of funds and may determine what services will be provided, who will be eligible, and how funds will be distributed among the various services. State or local SSBG agencies (i.e., county, city, and regional offices) may provide the services or purchase them from qualified agencies, organizations, or individuals. States report as recipients of SSBG-funded services any individuals who receive a service funded, in whole or in part, by SSBG.

Before a State receives SSBG funds, it must submit an annual preexpenditure report that describes how the State plans to administer its SSBG funds for the coming year. The general information collection is being revised to include voluntary use of the post expenditure reporting form as part of States' preexpenditure report to estimate expenditures and recipients. No specific format is required for the preexpenditure report; however, the intended use of funds – including the types of activities to be supported and the categories and characteristics of individuals to be served – must be included (42 U.S.C.§1397c).

States are also required to report expenditures of SSBG funds using a standard postexpenditure reporting form, which includes an annual total of adults and children served and expenditures in each of 29 service categories. Postexpenditure reporting requirements for SSBG are codified in the Code of Federal Regulations at 45 C.F.R §96.74.

The annual postexpenditure report is to be submitted within 6 months of the end of the period covered by the report, and must address:

- (1) The number of individuals (broken out by children, adults age 59 and younger, adults age 60 and older, and adults of unknown age) who receive services paid for in whole, or in part, with Federal funds under the SSBG;
- (2) The amount of SSBG funds spent in providing each service;
- (3) The amount of funds transferred into SSBG from the Temporary Assistance for Needy Families (TANF) block grant;

- (4) The total amount of Federal, State and local funds spent in providing each service, including SSBG funds; and
- (5) The method(s) by which each service is provided, showing separately the services provided by public and private agencies.

OMB form 0970–0234 was approved by OMB on May 10, 2005 and expires on May 31, 2008. In order to continue to facilitate the collection of high quality SSBG data, renewal of the current postexpenditure reporting form is being sought.

In addition, approval is being sought to request that States **voluntarily** use the postexpenditure report format to estimate expenditures and recipients, by service category, as part of the required annual preexpenditure report. Use of the postexpenditure form to estimate expenditures and recipients as part of the States' preexpenditure report will provide for a more accurate analysis of the extent to which SSBG funds are spent by the States "in a manner consistent" with each of the States' plan for their use, as required by 42 U.S.C. §1397e(a). The reporting form will be completed as it is for postexpenditure reporting with estimated expenditures and recipients data rather than actual expenditures and recipient data.

2. Purpose and Use of the Information Collection

Information collected on the preexpenditure and postexpenditure reports is analyzed and described in an annual report on SSBG expenditures and recipients produced by the Office of Community Services (OCS). Single-year annual reports have been completed each year for the years 1998 – 2005. The 2006 annual report is currently being finalized. The information contained in this report is used to establish how SSBG funding is used for the provision of services in each State. This information also assists OCS in developing performance measures for the SSBG program.

3. Use of Improved Information Technology and Burden Reduction

Currently, 63 percent of the States submit their postexpenditure reports electronically. The postexpenditure reporting form has been, and will continue to be, available for download from the SSBG web site in Microsoft Excel format. The modified¹ postexpenditure reporting form will also be available on the SSBG web site in Microsoft Excel format for the States that want to use the form as part of their preexpenditure report.

4. Efforts to Identify Duplication and Use of Similar Information

The SSBG postexpenditure reporting form is the only instrument that collects data regarding expenditures for, and recipients of, the 29 SSBG-supported service categories. The preexpenditure report is the only reporting mechanism for providing information on the intended use of SSBG funds.

¹ The only difference between the postexpenditure reporting form and the modified postexpenditure reporting form for use as part of the preexpenditure report is the insertion of the word "estimated" in the labels for Part A and Part B.

5. Impact on Small Business or Other Small Entities

This information collection does not impact small business or other small entities.

6. Consequences of Collecting the Information Less Frequently

States are required to submit a preexpenditure report as a prerequisite to receiving SSBG funds and submit postexpenditure reports on the expenditure of SSBG funds (42 USC 1397e). This information is critical for understanding the impact of SSBG funding.

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

- **Requiring respondents to report information to the agency more often than quarterly;**

No circumstances would require this. The SSBG preexpenditure and postexpenditure reports are submitted annually.

- **Requiring respondents to prepare a written response to an information collection request or requirement in fewer than 30 days after receipt of it;**

No circumstances would require this. The postexpenditure reporting form is the same form that States are currently using. The use of the postexpenditure reporting form as part of States preexpenditure report is voluntary. States could implement the use of the postexpenditure reporting form to estimate expenditures and recipients as part of their preexpenditure report, at any time. Some states are currently already using this format to provide estimates of expenditures and recipients.

- **Requiring respondents to submit more than an original and two copies of any document;**

Respondents are required to submit only one copy of the postexpenditure report and one copy of the preexpenditure report. If a report is not received, or if an electronic report submission cannot be accessed, a State may be requested to send an additional copy.

- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**

No circumstances would require this. The SSBG postexpenditure report covers expenditures during a one-year period only. Expenditures of funds from one previous year may be included, but no records of activities prior to that are required for completion of the report. The SSBG preexpenditure report provides information on the intended use of SSBG funds for a one-year period only.

- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**

No circumstances would require this.

- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

No circumstances would require this.

- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use;**

No circumstances would require this.

- **Requiring respondents to submit proprietary, trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect its confidentiality to the extent permitted by law;**

No circumstances would require this.

- **That may not provide results that can be generalized to the universe of study (it is important to recognize such a limitation and justify it here);**

It is possible that a State would submit data on the postexpenditure reporting form that could not be included with the other States for analysis purposes. This is likely to be the case for selected data elements only, rather than for the entire postexpenditure reporting form. For example, States are asked to report adult recipients in three age categories—age 59 years and younger, age 60 years and older, and adults of unknown age. States unable to provide this breakdown will not be included in analyses of services to the elderly, but will be included in other analyses, including full recipient counts and distinctions between child and adult recipients.

- **Requiring a waiver from OMB of the requirement that an agency not collect more than an original and two copies of any document. In order to obtain such a waiver, the agency must provide a compelling statement of the need for additional copies, a description of the use to be made of additional copies, and a statement of the negative impact on the public if the agency is unable to obtain the additional copies.**

No circumstances would require this. More than one original and two copies of the report would never be required.

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

A notice of proposed information collection was published in the *Federal Register* on November 13, 2007. No comments were submitted during the 60-day comment period that expired on January 14, 2008.

Prior to the notice of proposed information collection being published in the Federal Register, SSBG representatives from five States—Delaware, District of Columbia, Illinois, Ohio, Pennsylvania—were contacted in order to gain an understanding of the feasibility of using the postexpenditure report format to estimate expenditures and recipients as part of their preexpenditure report. All were supportive of using the postexpenditure report format to estimate expenditures and recipients. They also indicated that they did not anticipate any difficulties in implementing the use of this format.

9. Explanation of Any Payment of Gift to Respondents

No payment or gift will be provided to respondents.

10. Assurance of Confidentiality Provided to Respondents

No assurance of confidentiality will be provided to respondents. All reported expenditure data are from State public financial records and all recipient data are aggregate counts, not individual case-level data.

11. Justification for Sensitive Questions

None of the questions on the SSBG postexpenditure reporting form are of a sensitive nature. Expenditure data are from financial records. Recipient data are reported at the aggregate level and no names or other information on individual recipients is provided. The preexpenditure data that would be provided using the postexpenditure reporting form is the same type of data provided in the postexpenditure reporting form; they are estimates rather than actual data.

12. Estimates of Annualized Burden Hours and Costs

Following is an estimate of the total annual burden hours:

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
Postexpenditure Report	56	1	110	6,160
Use of Postexpenditure Report Form for Preexpenditure Report	56	1	1	56
Estimated Total Annual Burden Hours				6,216

Using an estimate of \$29.00 (\$22.00 per hour plus \$7.00 in benefits) for the salary of the State employee completing this report, the estimated cost to each State to complete the report is \$3,248.

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

Because the SSBG data collection effort depends upon State administrative databases, most States do not have any additional costs. Operating costs of the information systems are part of State agency operations, rather than maintained solely for the purpose of submitting the SSBG postexpenditure reporting form

14. Annualized Cost to the Federal Government

The annual cost to the Federal Government is shown in the following table:

AGENCY	Year 1	Year 2	Year 3	Average
Office of Community Services	\$49,690	\$51,490	\$53,290	\$51,490
Contractor Staff	\$144,855	\$151,097	\$158,811	\$151,587
Total	\$194,545	\$202,587	\$212,101	\$203,077

15. Explanation of Program Changes or Adjustments

There is one program change or adjustment. The general information collection is being revised to include voluntary use of the postexpenditure reporting form as part of States' preexpenditure report to estimate expenditures and recipients. Approval is being sought to request that States voluntarily use the postexpenditure report format to estimate expenditures and recipients, by service category, as part of the required annual preexpenditure report. Use of the postexpenditure form to estimate expenditures and recipients, as part of the States' preexpenditure report will provide for a more accurate analysis of the extent to which SSBG funds are spent by the States "in a manner consistent" with each of the States' plan for their use, as required by 42 U.S.C. §1397e(a). The reporting form will be completed as it is for postexpenditure reporting with estimated expenditures and recipients data rather than actual expenditures and recipient data.

16. Plans for Tabulation and Publication and Project Time Schedule

Results from this information collection are the basis for the annual report on SSBG expenditures and recipients.

The schedule of the 2006 annual report is as follows:

- States that report on a State fiscal year, which ends on June 30, 2006, must submit the postexpenditure report for 2006 by December 30, 2006.
- States that report on the Federal fiscal year, which ends on September 30, 2006, must submit their postexpenditure reports for 2006 by March 30, 2007.
- All data has been collected and analyzed.
- A draft report was submitted to OCS for review on October 22, 2007
- The second draft was submitted for clearance within ACF on December 11, 2007
- The final report will be submitted for review by OPA by February 11, 2007
- The annual report will be submitted for publication by April 14, 2008

17. Reason(s) Display of OMB Expiration Date is Inappropriate

The expiration date for OMB approval will be displayed.

18. Exceptions to Certification for Paperwork Reduction Act Submission

No exceptions to the certification statement are necessary.