

Comment A1: Why would ACF consider making this voluntary as opposed to mandatory?

In order to receive its SSBG allotment, each State is required to develop and submit an annual preexpenditure report that describes how the State plans to administer its SSBG funds for the coming year. No specific format is required for the preexpenditure report; however, the intended use of SSBG funds – including the types of activities to be supported and the categories or characteristics of individuals to be served – must be included. At this time the Office of Community Services is seeking approval from OMB for States to voluntarily use the postexpenditure report format to estimate expenditures and recipients, by service category, as part of the required annual intended use plan.

Comment A2: What do States currently use to submit pre-expenditure reports? Is there a standard format used or is each State afforded the autonomy to choose their method of submitting the required information? If the preexpenditure report is voluntary, how many States does ACF project would use it?

Each State is required to develop and submit an annual preexpenditure report that describes how the State plans to administer its SSBG funds for the coming year. No specific format is required for the preexpenditure report; however, the intended use of SSBG funds – including the types of activities to be supported and the categories or characteristics of individuals to be served – must be included. While there is no designated format for the intended use report, States typically provide a summary of the proposed activities and individuals to be served in narrative or chart format by service area.

Comment A3: How is the use of this report expected to affect the current burden placed on States to document and submit their projected expenditures for the upcoming fiscal? Does ACF anticipate that the reporting burden would actually decrease if this report was adopted? Would States we required to submit any additional material as part of their preexpenditure report or would this document suffice?

The affect on the current burden place on States to document and submit projected expenditures for the upcoming fiscal year will be insignificant. A State can use its most recent annual postexpenditure report as a reference to project expenditures for the upcoming fiscal year. States will continue to submit the usual documentation for the preexpenditure report along with the form with projected expenditures. Many States are already doing this.

Comment A4: Question on passback omitted.

Comment A5: What are States currently using for the preexpenditure report?

No specific format is required for the preexpenditure report. A State must include the intended use of funds with types of activities (or services) to be supported and the categories or characteristics of individuals to be served (such as children, adults 59 and younger, adults 60 and older, and the disabled). While there is no designated format for the intended use report, States typically provide a summary of the proposed activities and individuals to be served in narrative or chart format by service area.

Comment A6: Recommend changing “annual” to “postexpenditure” to maintain consistency throughout document.

Concur.

Comment A7: When are States expected to submit their preexpenditure reports for the upcoming fiscal year?

States are required to submit their preexpenditure reports for an upcoming fiscal year at least 30 days in advance of the given fiscal year.

Comment A8: Why would a State not be able to provide adequate information in each of these three areas?

There are rare instances when a State is not able to provide adequate information for a specific service category regarding age in order to distinguish child or adult recipients. Some States rely on data and numbers from multiple information systems and programs.

Comment A9: 110 HOURS seems incredibly high for this type of report. Please provide greater insight into exactly what this estimate includes.

The estimate of 110 hours as the average burden for a State to complete the postexpenditure report includes collecting and validating data from multiple programs within State agencies. Most often it is not one employee entering data from one information system within the State.

Comment A10: Why is the burden response for the pre-expenditure report so low as compared to the postexpenditure report?

A State can use its most recent annual postexpenditure report as a reference to project expenditures for the upcoming fiscal year.

Comment A11: Please revise this timeline to reflect the current time period.

The schedule of the 2007 annual report is as follows:

- States that report on a State fiscal year, which ended on June 30, 2007, must submit the postexpenditure report for 2007 by December 30, 2007.
- States that report on the Federal fiscal year, which ended on September 30, 2007, must submit their postexpenditure reports for 2007 by March 30, 2008.
- All data is collected and analyzed.

- A draft report will be submitted to OCS for review on October 24, 2008
- The second draft will be submitted for clearance within ACF on December 12, 2008.
- The final report will be submitted for review by OPA by February 13, 2009
- The annual report will be submitted for publication by April 18, 2009

Additional Question:

What happens when a State's proposed plan deviates significantly from its actual plan as reported on the postexpenditure report? Simply stated, what generally occurs when the postexpenditure reports differ greatly from the preexpenditure projections? Is this ever an issue, and if so, how is it currently addressed by ACF?

States are required to submit an amendment or revision throughout the year to the intended use plan to reflect the uses of the SSBG funds made available in a given fiscal year. The report should be revised as may be necessary to reflect substantial changes in the activities during the year. Postexpenditure reports do not differ greatly from the preexpenditure projections. This has not been an issue.