

SUPPORTING STATEMENT

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

Title II of the Child Abuse Prevention and Treatment Act (CAPTA), as amended by Pub. L. 108-36, reauthorized on June 25, 2003 (42 U.S.C. 5116), requires the applicant agency to submit information required by sections 201; 202; 203; 205, and 206 pursuant to receiving a grant award under this authority. Section 207 (1) – (8) and CFR Part 92 Subpart C specify requirements for the annual program and financial reports. The financial report is submitted on Standard Form 269 which has been approved by OMB No. 0348-0039.

This Program Instruction provides guidance to States and Territories on the required content of the Community-Based Grants for the Prevention of Child Abuse and Neglect (administratively known as Community Based Child Abuse Prevention Program, CBCAP) application as well as the content requirements for the annual program and financial reports.

2. Purpose and Use of Information

All of the information submitted will be used by ACYF to: (1) ensure compliance with the statute, (2) complete the calculation of the State's grant award entitlement, and (3) provide training and technical assistance to the grantee.

3. Use of Improved Information Technology and Burden Reduction

Applicants may submit the collection of information in formats most suitable to their agency. In the last few years, we have strongly encouraged electronic submission of the application and program report. It is, however, not likely that electronic submission methods would reduce the data collection burden, since most of the required information would be submitted in narrative form.

4. Effort to Identify Duplication Identification

No other data source collects similar information.

5. Impact on Small Business or Other Small Entities

Only the lead agency designated by the Chief Executive Office in each State or Territory, is eligible to submit an application for this grant award. Any Territory, at its own discretion, may request that the CBCAP funds be awarded as part of the Territory's consolidated grant. In that case, the Territory would not be required to submit an application under this program instruction.

The information required is the absolute minimum necessary for meeting the statutory requirements and providing the information on which the actual grant awards are calculated.

6. Consequences of Collecting the Information Less Frequently

Both the application, itself, and the annual program and financial reports are one-time per annum requirements. Without the prescribed application, as required by the statute, a State may not receive funding under this authority.

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

There are no special circumstances required in the collection of this information in a manner other than required by OMB.

8. Comments I Response to the Federal Register Notice and Effort to Consult Outside the Agency

A Federal Register Notice was published which solicited comments under the Paperwork Reduction Act directly to OMB on November 6, 2007. To date, no comments have been received.

Reporting and Recordkeeping Requirements: Final Rule, 5 CFR Part 1320, at section 1320.13 (c) requires the administering agency [DHHS] to “submit information indicating that it has taken all practicable steps to consult with interested agencies and members of the public in order to minimize the burden of the collection of information.” In compliance with that section, when the CBCAP program first began, the National Center on Child Abuse Neglect (now known as the Office on Child Abuse and Neglect) circulated an Information Memorandum which described the requirements for the Community-based Family Resource and Support (CBFRS, former name for CBCAP) grant award and provided a copy of the legislation to all State agencies, interested entities, and members of the public. On January 7, 1997 a public meeting was held for current grantees, which was open to, and attended by, representatives of other public and private entities who might wish to apply for the CBFRS grant. An interactive discussion was conducted about the CBFRS requirements, including information collection requirements. There was no opposition to any of the information collection requirements. Participants generally felt that the worksheet format presented in Attachment 5 of the Program Instruction would standardize the process for collecting leveraged funds information and ensure a fair and uniform way for States to present that information and the Department to assess it. Since that early meeting, regular ongoing contact through the CBCAP listserve, annual grantee meetings (the most recent being in April 2007), and informational inquiries have yielded strong support for the Program Instruction.

9. Explanation of Any Payment or Gift To Respondents

No payments other than a one-time grant award per application will be made to States or Territories.

10. Assurance of Confidentiality Provided to Respondents

Data in the applications are not confidential.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature in the application requirements.

12. Estimates of Annualized Burden Hours and Costs

The information collection burden hours listed below are only estimates. The CBCAP application is submitted on a one-time only (per annual grant award) basis. The hours per response are based on an average amount of time needed by the States, and those Territories so choosing to submit an independent application, for consultation, coordination, collection of baseline information, and for developing and submitting the required application. The application will be the basis for States and Territories to receive funding under Title II of CAPTA.

The Annual Program and Financial reports will be submitted annually on or before December 31st. These reports provide compliance information, indicate progress with meeting program goals and objectives, and pinpoint technical assistance needs.

The estimated information collection burden hours required to complete the Application, the Annual Program Report, and the Annual Financial Report (SF 269, OMB No. 0348-0039) are based on the assumption that all States and Territories will submit applications under this authority. Cost and respondent time are based on previous CBCAP grant applications and reports.

Annual Burden Estimates

FORM NAME	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	HOURS PER RESPONSE	RESPONSE BURDEN
APPLICATION	52	1	40	2080
ANNUAL PROGRAM REPORT	52	1	24	1248
TOTAL	52	1	64	3328

12.1 Estimates of Annualized Burdens Hours and Cost

We estimate that it will take approximately one week (40 hours) for each applicant to complete the Application, and approximately 24 hours to complete the annual Program and Financial Reports. We estimate the average hourly wage for staff developing the reports @ \$20/hour.

Respondent's Annual Cost Burden

Instrument	Annual Cost Burden for all 52 respondents	Cost per Response
Application	\$41,600	\$800.00
Annual Report	\$24,960	\$480.00
Total	\$66,560	\$1280

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

There are no additional annual direct costs to respondents as a result of this information

collection.

14. Annualized Cost to Federal Government

There are no additional Federal costs as a result of this information collection

15. Explanation for Program Changes or Adjustments

The last Program Instruction submission (January 2005) burden numbers were based on an estimate of the number of States and Territories that would respond. That estimate has not changed. The expected number of States and Territories applying for funding through this process remains 52.

16. Plans for Tabulation and Publication and Project Time Schedule

The Department does not plan to publish the information collected.

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

The Department will display the expiration date on the Program Instruction and the SF-269. The States and Territories will submit the Application and annual Program Report in the format of their choice.

18. Exceptions to "Certification for Paperwork Reduction Act Submission"

There are no exceptions to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

The information required to be submitted in the annual Application and in the Annual Program and Financial Reports does not require the use of statistical methods.