

THE SUPPORTING STATEMENT

The Office of Management and Budget (OMB) requires that for approval under the Paperwork Reduction Act a Supporting Statement must be prepared in the format specified below. Information in the Supporting Statement should be provided in a manner that is responsive to the OMB instructions, and each item must be identified using the numbering system given by OMB. If the Supporting Statement exceeds 10 single-spaced pages in length, there should be a summary not exceeding one page in length which precedes it.

Every effort should be made to keep the Supporting Statement to a length of 10-12 pages. When possible, detailed information should be placed in an attachment, which is then referenced in an appropriate place in the Supporting Statement so that interested reviewers can peruse it. Each attachment should be referenced in the text, so that a reviewer knows why it has been included and which portions may be of particular interest. Brevity and clarity with respect to both the text of the Supporting Statement and any attachments are highly desirable; only the information requested by the OMB outline and needed to understand the project should be included.

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must be entered in worksheet I. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

- A. Justification. Requests for approval shall:
 1. Circumstances Making the collection of Information Necessary

The State plan is a mandatory statement submitted to the Secretary of the Department of Health and Human Services by the state. It consists of an outline specifying how the state's TANF program will be administered and operated and certain required certifications by the state's Chief Executive Officer. It is used to provide the public with information about the program.

Authority to require states to submit a State TANF plan is contained in section 402 of the Social Security Act, as amended by Pub. L. 104-193, the Personal Responsibility and Work Opportunity Reconciliation Act of 1996. States are required to submit new plans periodically (i.e., within a 27-month period).

42 USC 602

2. Purpose and Use of the Information Collection

As provided in the statute, the Secretary makes a determination whether or not each state's plan is complete. Once a plan is determined complete, the state is eligible to receive a family assistance grant. The plan is also made available to the public.

3. Use of Improved Information Technology and Burden Reduction

To the extent that a state can complete its State plan faster and more efficiently using a computer word processing program, the burden is reduced. We encourage States to submit their plan information electronically in a format compatible with Microsoft Office software

4. Efforts to Identify Duplication and Use of Similar Information

No formal efforts to identify duplication have been made. However, through extensive contacts with organizations such as: the American Public Human Services Association (APHSA), the National Governors Association (NGA), the Welfare

Information Network (WIN), the Congressional Research Service, the Center for Law and Social Policy, etc., and individuals in both the private and public sectors, we have learned that no similar or duplicate information is available. There are organizations that collect selected pieces of the State plan information at a selected point in time. However, those collections do not include all of the contents of the State plan and any subsequent plan amendments.

5. Impact on Small Businesses or Other Small Entities

These requirements have no impact on small businesses or entities.

6. Consequences of Collecting the Information Less Frequently

Family assistance grants are payable to "eligible states." In order to remain "eligible" (i.e., continue to receive funding under TANF), a state needs to submit its State TANF plan during the applicable 27-month period. A state's family assistance grant is not released until its State plan is determined complete.

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

Not applicable.

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

The notice was published in the Federal Register on March 25, 2008 and may be found on page 15759. We received no comments. The Secretary currently has no authority to regulate in the area of State plan requirements. Consequently, we do not plan any changes related to this information collection. The only requirements for completion of the State plan are those specifically listed in the statute. However, we do have the opportunity to

discuss this State TANF plan information collection with each state each time a state submits its plan. States have a great deal of flexibility in determining the structure, format, level of detail, and length of their individual State plans. They have responded very positively to the limited list of requirements and the flexibility associated with this information collection.

9. Explanation of Any Payment or Gift to Respondents

No payments and/or gifts will be provided to respondents.

10. Assurance of Confidentiality Provided to Respondents

The information collected is not confidential.

11. Justification for Sensitive Questions

None of the information requested from state agencies is of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
State TANF plan	18	1	30	540

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS

Title Amendments	18	1	3	54
Estimated Total Annual Burden Hours: 594				

For the 54 states and jurisdictions, the state TANF plan requirements will create a triennial burden with an average of 18 states and jurisdictions responding annually. We estimate the annual burden to average 30 hours per response. We also estimate that the triennial burden of State plan amendments will average 3 hours per respondent for a total of 594 annual hours. While there is a tremendous variation from state to state, this estimate is based upon numerous conversations that we have had with state staff related to their experience with prior similar State plans and amendments.

The total annual staff cost of processing each triennial plan for all 54 states and jurisdictions are estimated to be \$29,700. This is based on the estimate that preparation will take 594 state staff-hours at an average cost of \$50 per hours (including overhead, fringe benefits, etc).

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

There are no direct monetary costs.

14. Annualized Cost to the Federal Government

The Federal annual cost associated with Regional and Central Office staff reviewing and processing the State TANF plans is estimated to be \$23,400. This is based on the estimate of

processing an average of 18 plans per year that will require 13 federal staff-hours per plan at an average cost of \$100 per hour (including overhead, fringe benefits, etc). The limited amount of photocopying of State plans and the limited use of the telephone for conference calls is already built into our general administrative expenses. This workload does not represent additional costs in those areas.

15. Explanation of Program Changes or Adjustments

Although the State TANF plan and amendments were previously approved as a biannual collection with an average of 54 responses per year, it is more accurate that the State TANF plan and amendments are completed triennially with an average of 36 states and jurisdictions responding annually. The annual burden is still estimated to average 30 hours per respondent for the State TANF plan, and an average of 3 hours per respondent for amendments, so the total burden in annual hours will decrease from 891 to 594 hours.

16. Plans for Tabulation and Publication and Project Time Schedule

Section 411(b) of the Personal Responsibility and Work Opportunity Act of 1996 requires the Secretary to submit a report to Congress each year that includes characteristics of each state's TANF program. ACF uses the information that is in the State plan as an important source of the information used to compile certain sections of this report. Published reports are posted to our web site at

<http://www.acf.hhs.gov/programs/ofa>
The TANF Annual Report to Congress is due April 1.

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

Display of the OMB expiration date is not inappropriate

18. Exceptions to Certification for Paperwork Reduction Act Submission

There are no exceptions to the certification statement in Item 19 of Form OMB 83-I.