

THE SUPPORTING STATEMENT

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) amended the Social Security Act and imposed certain data collection requirements including section 411(b)(3) (data collection and reporting), which requires the annual reporting of the characteristics of programs funded by PRWORA. These requirements are also discussed in Part 265 of the TANF final rule that was published on April 12, 1999. The requirement remains unchanged under the Deficit Reduction Act of 2006 and the TANF Reauthorization Interim Final Rule.

Authority: 42 U.S.C. 611.f

2. Purpose and Use of the Information Collection

These data will be used to assess and evaluate the Temporary Assistance for Needy Families Program (TANF) to include documentation of the characteristics of each State TANF and SSP-MOE program including design, operation, and populations served.

3. Use of Improved Information Technology and Burden Reduction

It is mandatory that States now submit this report as an electronic file via e-mail so there is a decrease in burden time since States no longer have to produce “clearance packages” in hard copy form. The electronic submission also saves on paper and mailing expenses.

4. Efforts to Identify Duplication and Use of Similar Information

There are no TANF-specific data available that are similar to what we collect with this information collection.

5. Impact on Small Businesses or Other Small Entities

This collection of information does not impact small businesses or other small entities. It will affect only states and territories and has been held to the absolute minimum required for the intended uses.

6. Consequences of Collecting the Information Less Frequently

The statute mandates the annual collection of the Annual Report on State MOE Programs.

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

This collection of information does not involve any special circumstances and will not result in a system of records. The data relate to program characteristics only.

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

On October 10, 2008, the Administration for Children and Families published in the Federal Register a notice of Proposed Information Collection Activity requesting comments on this information collection activity. We received no comments in response to the notice.

9. Explanation of Any Payment or Gift to Respondents

This data collection does not involve any payment or gift to respondents other than remuneration of grantees.

10. Assurance of Confidentiality Provided to Respondents

This data collection does not constitute a Privacy Act System of Records.

11. Justification for Sensitive Questions

This data collection does not contain any questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

| Instrument or Requirement | No. of Respondents | Yearly Submittals | Average Burden Hours per Response | Total Burden Hours |
|--|--------------------|-------------------|-----------------------------------|--------------------|
| Annual Report on State MOE Programs – ACF-204 §265.9(b)-(c)6 | 54 | 1 | 118 | 6,372 |
| OLDC system Updates- §265.6 | 54 | 2 | .125 | 13.5 |

Estimated Total Annual Burden Hours: 6,385.5

We have estimated the burden hours for each information collection activity as though they applied to all jurisdictions for ease of discussion and public review.

We estimate the annualized cost of the hour burden to be \$574,695. This is an overestimate since the electronic reporting has decreased paper and mailing expenses. It is based on an estimated average hourly cost of \$90 (including fringe benefits, overhead, and general and administrative costs) for the State staff performing the work multiplied by the estimated 6,385.5 burden hours.

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

The following is an estimate of the annual cost burden to respondents or recordkeepers resulting from the collection of information. (The estimate does not include the cost of any hour burden shown in items 12 and 14 of this supporting statement).

For this information collections, we estimate there to be zero average annualized capital/start-up and operational and maintenance costs (CSO&M). There is no change from the previous estimate. The only costs would be those associated with the hour burden shown in items 12 and 14 of this supporting statement.

14. Annualized Cost to the Federal Government

This item does not reflect any of the costs shown in items 12 and 13 of this supporting statement, nor does it correspond to any item on the Paperwork Reduction Act Submission form (83-1).

We estimate total annual federal burden to be 243 hours. This includes the costs of information collection, development, printing forms, e-mail list compilation and maintenance, e-mailing, editing, calculations, analysis, evaluation, publication of results, technical assistance, and monitoring. Based on an estimated average hourly federal salary of \$100 per hour (including fringe benefits, overhead, etc), the total estimated average annual Federal cost is \$24,300.

15. Explanation for Program Changes or Adjustments

There is reduction in burden on respondents of 9.75 hours per respondent for a total reduction from 6,912 hours to 6,385.5 hours. The estimated 9.75 hours per respondent is due to no longer having to prepare submissions in hard copy format in order for routing via the desk-to-desk method. The report will now be routed electronically to all appropriate parties, therefore saving time in the clearance process. This is a program change due to the addition of the OLDC system updates and instructions which allows for electronic submission and an overall reduction in burden.

16. Plans for Tabulation and Publication and Project Time Schedule

We analyze and compile these data at the end of each fiscal year after the states have transmitted the data to us. These data will also provide us with the necessary information to carry out our other financial management and oversight responsibilities. Other analyses will include, but not necessarily be limited to, analyses of the impacts of various TANF provisions and descriptions of the characteristics of the populations served. We publish these findings in the TANF Annual Report to Congress.

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

Not applicable

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable

B. Statistical Methods (used for collection of information employing statistical methods)

Not applicable