

THE SUPPORTING STATEMENT

Supporting Statement for the Tribal TANF Report Form (ACF-196T)

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Pub. L. 104-193 (PRWORA), made sweeping changes to national welfare policy and placed new emphasis on the goal of work and personal responsibility. PRWORA gave federally recognized American Indian tribes the option to administer their own TANF (Temporary Assistance to Needy Families) programs either individually or as part of a consortium, an option they did not have in the past. This program is authorized in section 412 of the Social Security Act.

Section 412(h) of the Act requires Tribes receiving TANF grants to make reports on programs and activities as required by the Secretary of Health and Human Services. Implementing regulations at 45 CFR 286.245 and 286.255 require quarterly reports.

The ARRA (Pub. L. 111-5) requires additional data to be collected.

2. Purpose and Use of the Information Collection

Tribal agencies with approved Tribal TANF plans for implementation of the TANF program report the data on a quarterly basis. Failure to collect this data would seriously compromise ACF's ability to monitor expenditures.

3. Use of Improved Information Technology and Burden Reduction

ACF has developed a forms database – the Online Data Collection System (OLDC) -- that allows authorized users to electronically enter data for the ACF-196T over the internet. OLDC contain edits that automatically calculate totals and check for arithmetic errors. In addition, an electronic copy of the ACF-196T form is available via the internet and, upon request, via a diskette or e-mail attachment.

4. Efforts to Identify Duplication and Use of Similar Information

Information collected in this report is/will not be available through any other Federal source. No similar available information has been identified.

5. Impact on Small Businesses or Other Small Entities

These forms apply only to Tribal governments. Small businesses are not involved.

6. Consequences of Collecting the Information Less Frequently

Current regulations at 45 CFR 286.245 require this information collection be collected on a quarterly basis. Financial management of the program would not be compromised if the expenditure data in the form were collected on an annual basis. Recommendation will be made to change the regulatory requirement from quarterly to annual.

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

No special circumstances are noted for this request for information collection.

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

The Federal Register Notice soliciting comments on the information collection has not been published. When the Federal Register Notice is published, an email to all ACF Regional Offices will forward a copy of the Notice with instructions to the Regional Office to share the Notice with all Tribal TANF grantees. Additionally, the email will detail the changes to the report form ACF-196T. ACF Regional Offices have ongoing discussions with States, and Territories about the ACF-196T financial reporting requirements.

9. Explanation of Any Payment or Gift to Respondents

No payments or gifts are provided to Respondents.

10. Assurance of Confidentiality Provided to Respondents

There are no data collected that require confidentiality.

11. Justification for Sensitive Questions

Data collected are not of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	HOURS PER RESPONSE	RESPONSE BURDEN
ACF-196T CCDF Financial Reporting Form for Tribes	56	4	1.5	336

Estimated Total Annual Burden Hours: 336

The annual cost per grantee is estimated at \$108 (6 total hours x \$18 per hour). This results in an estimated annual cost for all respondents of \$6,048.

Burden hour estimates were made using past experience with the formerly approved form.

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

No additional costs should be associated with this collection that are not contained in questions 12 and 14.

14. Annualized Cost to the Federal Government

The annual cost to the Federal government is estimated at \$31,300. This is based on submission of 224 completed forms, requiring approximately 1200 professional staff hours at an average of \$25 per hour (\$30,000); 100 clerical staff hours at an average of \$12 per hour (\$1200); and reproduction and mailing fees of approximately \$100.

15. Explanation for Program Changes or Adjustments

There are no changes in the reporting burden from the previous approved ACF-196T form. The estimated burden hours recognizes that participation in the Online Data Collection (OLDC) System used to electronically submit the ACF-196T form requires a registration process and training in order to use the system.

16. Plans for Tabulation and Publication and Project Time Schedule

There is no plan to publish information collected as a result of this form.

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

We will display the expiration date on the form.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

We are not aware of any exceptions to the Certification for Paperwork Reduction Act Submission.

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

Not Applicable. Statistical methods are not included in this collection of information.