## THE SUPPORTING STATEMENT

## ACF-696T CCDF Financial Reporting Form for Tribes

## A. Justification

1. Circumstances Making the Collection of Information Necessary

The Administration for Children and Families (ACF) is authorized to collect and report the information requested under this form by the Child Care and Development Block Grant Act of 1990, as revised. Implementing regulations at 45 CFR 98.64 and 98.67 indicates that the Secretary shall require financial reports as necessary.

The ARRA data elements were first approved through an emergency request preceding this request. These data elements continue in this request.

2. Purpose and Use of the Information Collection

Tribal agencies with approved Tribal plans for implementation of the CCDF program report the data on an annual 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 that allows electronic data entry for the ACF-696T over the internet. In addition, an electronic copy of the ACF-696T 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

Financial management of the program would be seriously compromised if the expenditure data in the form (ACF-696T) were collected on a less than annual basis. Federal policy presumes the strictest controls on funding documentation in support of claims for reimbursement.

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 was published on July 13, 2009. When the Federal Register Notice was published, an email to all ACF Regional Offices forwarded a copy of the Notice with instructions to the Regional Office to share the Notice with all CCDF grantees. Additionally, the email detailed the changes to the report form ACF-696T. ACF Regional Offices have ongoing discussions with Tribes about the ACF-696T financial reporting requirements. No comments were received to the Federal Notice.

9. Explanation of Any Payment or Gift to Respondents

No provision for payment or gift to respondents applies to this collection.

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-696T CCDF Financial Reporting Form for Tribes	232	1	8	1856

Estimated Total Annual Burden Hours: 1856

Total respondents of 232 with a total of one annual response at 8 hours per response equals a total of 1,856 annual hours requested. Assuming the value of respondents' time is \$25 an hour, the estimated cost is \$46,400 (1,856 total hours X \$25.00). 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 \$33,800. This is based on submission of 232 completed forms, requiring approximately 1300 professional staff hours at an average of \$25 per hour (\$32,500); 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 program changes are adjustments.

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 statement identified on Item 19.

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

Statistical methods are not included in this collection of information.