

OMB Supporting Statement
Proposed Information Collection:
TANF Emergency Fund Subsidized Jobs

A. Justification

1. Circumstances Making the Collection of Information Necessary

On February 17, 2009, the President signed the American Recovery and Reinvestment Act of 2009 (Recovery Act), which establishes the Emergency Contingency Fund for State TANF Programs (Emergency Fund) as section 403(c) of the Social Security Act (the Act). This legislation provides up to \$5 billion to help States, Territories, and Tribes in fiscal year (FY) 2009 and FY 2010 that have an increase in assistance caseloads or in certain types of expenditures. The Recovery Act also made other changes to TANF – extending supplemental grants through FY 2010, expanding flexibility in the use of TANF funds carried over from one fiscal year to the next, and adding a hold-harmless provision to the caseload reduction credit for States and Territories serving more TANF families.

The Emergency Fund is intended to build upon and renew the principles of work and responsibility that underlie successful welfare reform initiatives. The Emergency Fund provides resources to States, Territories, and Tribes (referred to collectively here as “jurisdictions”) to support work and families during this difficult economic period.

Many jurisdictions are implementing subsidized employment programs as a result of the availability of this new funding, and there is substantial interest in understanding how this funding has been used. There is also significant public interest in the number of individuals that are being placed in subsidized employment as a result of the Recovery Act. As a result, we are proposing a voluntary data collection for jurisdictions regarding information on the number of individuals in subsidized employment funded in whole or in part by the TANF Emergency Fund or that were included in the calculation of a TANF Emergency Fund award. The definition of subsidized employment used for this collection is the same as the definition for the TANF program in general, given in 45 CFR 261.2(c) and (d). This information will help the agency as well as the public better understand how jurisdictions are using the money they are awarded through the Emergency Fund.

Section 411 of the Social Security Act requires that States and Territories collect information on families receiving assistance and report this information quarterly to the Office of Family Assistance. Section 411(a)(1)(A)(xi) further specifies that States and Territories should report information on participation in employment activities, including private and public employment for families receiving assistance.

Section 403(c) established by the Recovery Act contains the language creating the TANF Emergency Fund, and paragraph 4 under subsection (c) provides authority to the Secretary to collect expenditure data relating to the TANF Emergency Funds. While the information we propose to collect goes beyond expenditure data, a voluntary collection of information on the number of subsidized jobs will help the agency interpret this spending information and inform the public how these funds were used by jurisdictions.

Language from the Social Security Act referenced above is repeated below:

Sec. 411. [42 U.S.C. 611] (a) Quarterly Reports by States.—

(1) General reporting requirement.—

(A) Contents of report.—Each eligible State shall collect on a monthly basis, and report to the Secretary on a quarterly basis, the following disaggregated case record information on the families receiving assistance under the State program funded under this part (except for information relating to activities carried out under section 403(a)(5)):

(xi) If the adults participated in, and the number of hours per week of participation in, the following activities:

(I) Education.

(II) Subsidized private sector employment.

(III) Unsubsidized employment.

(IV) Public sector employment, work experience, or community service.

(V) Job search.

(VI) Job skills training or on-the-job training.

(VII) Vocational education.

Sec. 403. [42 U.S.C. 603] (c) Emergency Fund.—

(4) Authority to make necessary adjustments to data and collect needed data.—In determining the size of the caseload of a State and the expenditures of a State for basic assistance, non-recurrent short-term benefits, and subsidized employment, during any period for which the State requests funds under this subsection, and during the emergency fund base year of the State, the Secretary may make appropriate adjustments to the data, on a State-by-State basis, to ensure that the data are comparable with respect to the groups of families served and the types of aid provided. The Secretary may develop a mechanism for collecting expenditure data, including procedures which allow States to make reasonable estimates, and may set deadlines for making revisions to the data.

This request is being submitted under section 1320.13, Emergency Processing. The following is the justification submitted to OMB prior to approval for use of emergency procedures:

The Administration for Children and Families (ACF) requests emergency clearance to collect information on the number of individuals in subsidized employment as a result of the TANF Emergency Fund. The TANF Emergency Fund was authorized under the American Recovery and Reinvestment Act of 2009 (Recovery Act), and this legislation provided up to \$5 billion to help States, Territories, and Tribes in fiscal year (FY) 2009 and FY 2010 that have an increase in assistance caseloads or in certain types of expenditures.

Many jurisdictions are implementing subsidized employment programs as a result of the availability of this new funding, and there is substantial interest from the White House, OMB, the Congress, and the media in understanding how this funding has been used. There is also significant public interest in the number of individuals that are being placed in subsidized employment as a result of the Recovery Act. This information will help the agency as well as the

public better understand how jurisdictions are using the money they are awarded through the Emergency Fund.

As a result, we are seeking emergency clearance to begin a voluntary data collection to gather information on the number of individuals in subsidized employment funded in whole or in part by the TANF Emergency Fund or that were included in the calculation of a TANF Emergency Fund award. We are requesting emergency clearance as the authorization for this program expires at the end of FY 2010, creating an extremely brief window of opportunity for data collection.

Given this Administration's commitment to transparency and accountability, it would create public harm if the results of this program were not captured and quantified. The first data collection is due August 14, 2010/ Failing to collect information on subsidized employment funded through use of the TANF Emergency Fund would prevent the Administration, the Congress, and the public from obtaining meaningful information about the program.

Therefore, this collection of information is needed prior to the time allowed by the use of normal clearance procedures and is essential to the mission of the agency. ACF requests a determination by June 30, 2010 under Sec. 1320.13 of the Paperwork Reduction Act regulation.

2. Purpose and Use of the Information Collection

A voluntary information collection relating to the number of individuals in subsidized employment will serve several purposes. This information will demonstrate the impact of the program, help ACF to evaluate the effectiveness of this initiative, and provide information to aide in the transparency and accountability of jurisdictions receiving Recovery Act funds. This information will also allow the Administration to publicly communicate the impact and achievements of the program, and make future policy decisions on the basis of such knowledge.

3. Use of Improved Information Technology and Burden Reduction

We have designed a voluntary information collection instrument in Microsoft Excel that will facilitate ease of reporting as well as internal data review and monitoring, while reducing the burden on grantees. Jurisdictions are urged to input the necessary data into the instrument and to submit electronically to save on burden time, paper and mailing expenses. We will also accept hard copy submissions of the form.

4. Efforts to Identify Duplication and Use of Similar Information

We currently collect information on individuals receiving cash assistance that participate in subsidized employment. However, many jurisdictions are providing subsidized employment to other low-income individuals not receiving cash assistance that would not be reported to us in our standard data report. Collecting data through the use of this new voluntary data collection form will augment the data we already receive, but it will not duplicate any other data collection.

5. Impact on Small Businesses or Other Small Entities

This collection of information does not impact small businesses or other small entities, as the information will be collected and submitted by TANF agencies. It will affect only jurisdictions that apply for and receive TANF Emergency Funds. The proposed data collection form contains only one element to be reported each month, which minimizes the amount of effort required by jurisdictions in reporting this information.

6. Consequences of Collecting the Information Less Frequently

The Emergency Fund is a time-limited initiative as funded under the Recovery Act of 2009. Therefore, collection of monthly data to be reported quarterly is essential to allow ACF to gather necessary information from the jurisdictions before the program’s authorization expires at the end of FY 2010. Jurisdictions currently collect other TANF information by month and submit it quarterly, so collecting monthly data on subsidized employment would align with other existing reporting requirements.

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

This collection of information does not involve any special circumstances.

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

This request is under emergency review and therefore Federal Register comments have not been received at this time. We have consulted with several jurisdictions regarding this information collection and annual burden estimates.

9. Explanation of Any Payment or Gift to Respondents

No payment or gift will be made to respondents during data collection.

10. Assurance of Confidentiality Provided to Respondents

This data collection does not constitute a Privacy Act System of Records and no assurance of confidentiality will be provided to respondents.

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

Annual Burden Estimates

Instrument	Number of	Number of	Average Burden	Total Burden
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	Respondents	Responses per Respondent	Hours per Response	Hours
Subsidized Employment Report OFA-200	74 jurisdictions	2 (Q3 & Q4 of FY 2010)	24	3,552

Estimated Total Annual Burden Hours: 3,552 hours

We estimate the annualized cost of the hour burden to be \$177,600. This figure is based on an estimated average hourly cost of \$50 (including fringe benefits, overhead, and general and administrative costs) for the jurisdiction staff performing the work multiplied by the estimated 3,552 burden hours, calculated based on 74 jurisdictions applying for and receiving TANF Emergency Funds (all States and Territories, plus an estimated 20 Tribes). Jurisdictions would submit two report for FY 2010, one for quarter 3 and one for quarter 4.

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 collection, we estimate there to be zero average annualized capital/start-up and operational and maintenance costs (CSO&M). We expect jurisdictions to already have this data as it is similar to data collected for the quarterly TANF data report. 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

We estimate that it will require four hours per response for the analysis of submitted data, discussing findings with regional office staff with responsibility for the jurisdiction, central and regional staff discussing data with the jurisdiction, and summarizing conclusions from data analysis. We estimate that the total annual federal burden will be 592 hours.

Based on an estimated average hourly federal salary of \$50 per hour (including fringe benefits, overhead, etc), the total estimated average annual Federal cost is \$29,600.

15. Explanation for Program Changes or Adjustments

Not applicable. This is a new collection.

16. Plans for Tabulation and Publication and Project Time Schedule

We plan to publish the available information on the Recovery Act section of our website.

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