

**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.

## **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 aid 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 45 days after the end of the fiscal year 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 45 days after the end of each quarter, 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**

We initially requested emergency clearance to collect this data and received approval of our data collection form, and we also posted a Federal Register notice on June 8 stating our intent to collect this information and invited comments. As a result of this notice we received comments that yielded improvements to our data collection instrument, and we are therefore submitting a revised data collection form for emergency clearance. The revised data collection form includes the following changes:

1. Adds the "program start date" field to capture when the program began
2. Rewords the instructions for line 1 to clarify the information we are requesting

3. Adds line 2 to capture the number of cumulative placements
4. Requests information for FY 2011 in addition to FY 2010, in anticipation of an extension of the TANF Emergency Fund

**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 Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
Subsidized Employment Report OFA-200	74 jurisdictions	4	24	7,104

Estimated Total Annual Burden Hours:

We estimate the annualized cost of the hour burden to be \$639,360. This figure is based on an estimated average hourly cost of \$90 (including fringe benefits, overhead, and general and administrative costs) for the jurisdiction staff performing the work multiplied by the estimated 7,104 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 one report for FY 2010 covering quarter 3 and quarter 4. If the TANF Emergency Fund is extended and jurisdictions report in FY 2011, the jurisdiction would submit four additional responses.

**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 \$100 per hour (including fringe benefits, overhead, etc), the total estimated average annual Federal cost is \$59,200.

#### **15. Explanation for Program Changes or Adjustments**

There is a program change based on two collections to four due to a change in frequency. This is based on the assumption the Emergency Fund will be reauthorized.

As a result of public comments, we have changed our approved data collection to record the start date of each jurisdiction's subsidized employment program and include information on cumulative job placements in addition to monthly statistics.

#### **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