

# Supporting Statement A

## Social Services Block Grant (SSBG) Post-Expenditure Report

OMB Control No. 0970-0234

**Terms of Clearance:** None

### A. Justification

#### 1. Circumstances Making the Collection of Information Necessary

The Social Services Block Grant (SSBG) program provides funds to States, the District of Columbia, Guam, Puerto Rico, American Samoa, the Virgin Islands, and the Commonwealth of the Northern Mariana Islands (hereinafter referred to as States) to support social services for adults and children in support of five statutory goals (42 U.S.C §1397). Funds are allocated to the States on the basis of population as block grants for the administration of their social services programs.

Within specific legal limitations (42 U.S.C. 1397d), States have substantial discretion in the use of funds and may determine what services will be provided, who will be eligible, and how funds will be distributed among the various services. State or local SSBG agencies (i.e., county, city, and regional offices) may provide the services or purchase them from qualified agencies, organizations, or individuals. States report as recipients of SSBG-funded services any individuals who receive a service funded, in whole or in part, by SSBG.

Before a State receives SSBG funds, it must submit an annual intended use plan that describes how the State plans to administer its SSBG funds for the coming year. No specific format is required for the intended use plan; however, the intended use of funds—including the types of activities to be supported and the categories and characteristics of individuals to be served— must be included (42 U.S.C. §1397c).

States are also required to report expenditures of SSBG funds using a standard post-expenditure reporting form, which includes an annual total of adults and children served and expenditures in each of 29 service categories. Post-expenditure reporting requirements for SSBG are codified in the Code of Federal Regulations at 45 C.F.R §96.74.

The annual post-expenditure report is to be submitted within 6 months of the end of the period covered by the report, and must address:

- (1) The number of individuals (broken out by children, adults age 59 and younger, adults age 60 and older, and adults of unknown age) who receive services paid for in whole, or in part, with Federal funds under the SSBG;
- (2) The amount of SSBG funds spent in providing each service;
- (3) The amount of funds transferred into SSBG from the Temporary Assistance for Needy Families (TANF) block grant;
- (4) The total amount of Federal, State and local funds spent in providing each service, including SSBG funds; and
- (5) The method(s) by which each service was provided, showing separately the services provided by public and private agencies.

OMB form 0970–0234 was approved by OMB on July 3, 2008 and expires on July 31, 2011. To facilitate the collection of high quality SSBG data, renewal of the current post-expenditure reporting form is being sought. Renewal of the approval for States to voluntarily use the post-expenditure reporting form to estimate expenditures and recipients, by service category, as part of the required annual intended use plan, is also being sought.

## **2. Purpose and Use of Information Collection**

Information collected on the post-expenditure reports is analyzed and described in an annual report on SSBG expenditures and recipients produced by the Office of Community Services (OCS). Single-year annual reports have been completed each year for the years 1998 – 2009. The information contained in this report is used to establish how SSBG funding is used for the provision of services in each State. This information also assists OCS in developing performance measures for the SSBG program. The information collected is the only source of information on the use of SSBG funds by the States. It is also the only source of information on the number of recipients of services funded, in whole or in part, by SSBG.

## **3. Use of Improved Information Technology and Burden Reduction**

Currently, 81 percent of the States submit their post-expenditure reports electronically. The post-expenditure reporting form has been, and will continue to be, available for download from the SSBG Web site in Microsoft Excel format. The modified post-expenditure reporting form (SSBG Reporting Form: Intended Use

Estimates, see appendix C)<sup>1</sup> is also available on the SSBG Web site in Microsoft Excel format for the States that want to use the form as part of their intended use plan.

**4. Efforts to Identify Duplication and Use of Similar Information**

The SSBG post-expenditure reporting form is the only instrument for collecting data on expenditures for, and recipients of, the 29 SSBG-supported service categories. The modified post-expenditure reporting form is the only reporting mechanism for providing information on the intended use of SSBG funds.

**5. Impact on Small Businesses or Other Small Entities**

No small businesses will be involved in this study. This data collection does not impact small business or other small entities.

**6. Consequences of Collecting the Information Less Frequently**

States are required to submit an annual intended use plan as a prerequisite to receiving SSBG funds. States are also required to submit an annual post-expenditure report on the use of SSBG funds (42 USC 1397e). This information is critical for understanding the impact of SSBG funding.

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

- **Requiring respondents to report information to the agency more often than quarterly.**

No circumstances would require this. The SSBG intended use plans and post-expenditure reports are submitted annually.

- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt.**

No circumstances would require this. The post-expenditure reporting form is the same form that States currently use. The use of the post-expenditure reporting form as part of States intended use plan is voluntary. States could implement the use of the post-expenditure reporting form to estimate expenditures and recipients as part of their intended use plan at any time. Some states are already using this format to provide estimates of expenditures and recipients.

- **Requiring respondents to submit more than an original and two copies of**

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<sup>1</sup> The only difference between the post-expenditure reporting form and the pre-expenditure reporting form to be used with the intended use plan is the insertion of the word “estimated” and “proposed” in the labels for Part A and Part B in the pre-expenditure reporting form.

**any document.**

Respondents are required to submit only one copy of the post-expenditure report and one copy of the intended use plan. If a report is not received, or if an electronic report submission cannot be accessed, a State may be requested to send an additional copy.

- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.**

No circumstances would require this. The SSBG post-expenditure report covers expenditures during a one-year period only. Expenditures of funds from one previous year may be included, but no records of activities prior to that are required for completion of the report. The SSBG intended use plan provides information on the intended use of SSBG funds for a one-year period only.

- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.**

No circumstances would require this.

- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB; That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.**

No circumstances would require this.

- **Requiring respondents to submit proprietary, trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

No circumstances would require this.

**All guidelines are met and the request fully complies with the regulation.**

## **8. Comments in Response to the Federal Register Notice/Outside Consultation**

A 60-day Federal Register Notice was published in the *Federal Register* on October 22, 2010, vol. 75, No. 204; pp. 65352-53. There were no public comments.

After the notice of proposed information collection was published in the Federal Register on October 22, 2010, Four States provided feedback—the District of Columbia, Illinois, Michigan, and Utah. Feedback indicated that the proposed change would significantly increase reporting burden. The representative from one State explained that they currently calculate “Expenditures of All Other Federal, State, and Local Funds” by subtracting SSBG expenditures from total expenditures. It was also emphasized that distinguishing between Federal and State/local funds would be much more difficult.

The names, title, telephone numbers and e-mail addresses of those consulted are as follows:

Name	Title	Agency	Contact Number	E-mail address
Deborah Christopherson	Budget Analyst	Family Independence Agency	(517) 335-3730	<a href="mailto:christophersond@michigan.gov">christophersond@michigan.gov</a>
Sheila Jones	Chief, Adult Protective Services	Family Service Administration	(202) 299-2155	<a href="mailto:sheilay.jones@dc.gov">sheilay.jones@dc.gov</a>
Lynn Sanderson	Financial Manager	Department of Human Services	(801) 538-9871	<a href="mailto:lsanders@utah.gov">lsanders@utah.gov</a>
Steve Totten	Program Specialist	Office of the Secretary	(217) 782-0693	<a href="mailto:Steve.Totten@illinois.gov">Steve.Totten@illinois.gov</a>

In the 60-day FR notice one change to the post-expenditure reporting form was proposed. The proposed change was a modification of the column titled, Expenditures of All Other Federal, State, and Local Funds of Part A of the form. After receipt of feedback on the proposed change, it was decided not to make any changes to the column titled, Expenditure of All Other Federal, State, and Local Funds and keep the post-expenditure reporting form the same as the form previously approved by OMB.

**9. Explanation of any Payment/Gift to Respondents**

No payment or gift will be provided to respondents.

**10. Assurance of Confidentiality Provided to Respondents**

No assurance of confidentiality will be provided to respondents. All reported expenditure data are from State public financial records and all recipient data are aggregate counts, not individual case-level data. No personal identifiers will be collected. IRB review is not required for data reporting.

**11. Justification for Sensitive Questions**

None of the questions on the SSBG post-expenditure reporting form are of a sensitive nature. Expenditure data are from financial records. Recipient data are reported at the aggregate level and no names or other information on individual recipients are provided. The data provided in the intended use plan is the same type of data provided in the post-expenditure reporting form; they are estimates rather than actual data.

**12. Estimates of Annualized Hour and Cost Burden**

**12A. Estimated Annualized Burden Hours**

Type of Respondent	Form Name	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response (in hours)	Total Burden Hours
State employee	Post-expenditure reporting form	56	1	110	6,160
State employee	Modified post-expenditure reporting form	56	1	2	112
Total					<b>6,272</b>

**12B. Estimated Annualized Cost to Respondents**

Using an estimate of \$37.00 for the salary of the State employee completing this report, the estimated cost to each State to complete the report is \$4,144.

The annual burden is based upon the average hourly salary of State finance managers and social and community service managers.

Type of Respondent	Burden Hours	Hourly Wage Rate	Respondent Costs
State employee	110	\$37.00	\$4,070.00
State employee	2	\$37.00	\$74.00
Total			<b>\$4,144.00</b>

**13. Estimates of other Total Annual Cost Burden to Respondents or Recordkeepers/Capital Costs**

Because the SSBG data collection effort depends upon State administrative databases, most States do not have any additional costs. Operating costs of the information systems are part of State agency operations, rather than maintained solely for the purpose of submitting the SSBG post-expenditure reporting form

**14. Annualized Cost to Federal Government**

The annual cost to the Federal Government is shown in the following table:

AGENCY	Year 1	Year 2	Year 3	Average
Office of Community Services	\$55,090	\$56,890	\$58,690	\$56,890
Contractor Staff	\$165,311	\$171,499	\$177,999	\$171,603
Total	\$220,401	\$228,389	\$236,689	\$228,493

The dollar amounts displayed for Office of Community Services represents a portion of one federal staff person’s salary at a GS-13 level to perform the duties of a project officer.

The dollar amount displayed for the Contractor Staff represents a team from Walter R. Mc Donald & Associates, Inc. who provides data collection and support annually for the Office of Community Services.

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

There is an adjustment in burden. The amount of time has been doubled due to feedback from States.

**16. Plans for Tabulation and Publication and Project Time Schedule**

Results from this information collection are the basis for the annual report on SSBG expenditures and recipients.

The schedule of the 2010 annual report is as follows:

- States that report on a State fiscal year, which ends on June 30, 2010, will submit the post-expenditure report for 2010 by December 30, 2010.
- States that report on the Federal fiscal year, which ends on September 30, 2010, will submit their post-expenditure reports for 2010 by March 30, 2011.
- A draft report will be submitted to OCS for review in October 2011
- The second draft will be submitted for clearance within ACF in December 2011
- The final report will be submitted for review by OPA in February 2012
- The annual report will be submitted for publication in April 2012

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

The expiration date for OMB approval will be displayed.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions**

No exceptions to the certification statement are necessary.