

## THE SUPPORTING STATEMENT

### **A. Justification.**

#### **1. Circumstances Making the collection of Information Necessary**

The Deficit Reduction Act of 2005 (DRA) reauthorized the Temporary Assistance for Needy Families (TANF) program and imposed a new data requirement that States prepare and submit data verification procedures and replaced other data requirements with new versions including: the TANF Data Report, the SSP-MOE Data Report, the Caseload Reduction Documentation Process, and the Reasonable Cause/Corrective Compliance Documentation Process: These requirements are also discussed in Part 265 of the TANF Final Rule. The Claims Resolution Act of 2010 extended the TANF program through September 2011. We are proposing to continue these information collections without change.

Authority: 42 U.S.C. 601,607, 609, 611, 613, and 1302

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

These data will be used to assess and evaluate the Temporary Assistance for Needy Families Program (TANF) to include documentation of the following for each State: (1) meeting statutorily required participation rates; (2) qualifying for work participation caseload reduction credit; (3) being subject to certain statutorily mandated penalties; (4) being considered for a "reasonable cause" exception and a reduction in the amount of the penalty for failure to meet the work participation requirements; and (5) helping to validate data.

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

States must file the quarterly TANF Data Report and the quarterly SSP-MOE Data Report electronically based on format specifications that we will provide. The decision to use

electronic filing was based on a need to reduce the paperwork burden and to increase the efficiency and timeliness of these primarily disaggregated data collections.

The other strictly aggregate data collections are much smaller and not conducive to electronic filing. However, electronic files may be submitted by email.

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

There are no TANF-specific data available that are similar to what we are proposing to collect.

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

These collections of information do not impact small businesses or other small entities. They will affect only States and territories and have been held to the absolute minimum required for the intended uses.

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

The statute mandates the quarterly collection of most of the data in the TANF Data Report and the SSP-MOE Data Report. The caseload reduction and corrective compliance documentation processes are annual occurrences because the statute provides for annual evaluation of caseload reduction and the annual imposition of penalties.

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

Only the TANF Data Report and the SSP-MOE Data Report involve a Privacy Act System of Records. An Amended System of Records Notice was published on pages 33644-33648 of the Federal Register, Vol. 69, No.115 dated Wednesday, June 16, 2004.

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

This final rule incorporated our response to comments regarding the reporting burden that we received in response to the interim final rule and Paperwork Notice we published on June 29, 2006.

We received no comments for **Federal Register** / Vol. 76, No. 32 / Wednesday, February 16, 2011 / Notices

The burden estimate is unchanged from our original estimate. The Claims Resolution Act of 2010 extended the TANF program through September 2011.

We are submitting the ICR in the same manner that we did for the Final TANF rule. As we have in the past, once the new reporting forms are approved, we will issue a program instruction that includes instructions for completing and submitting the data.

**9. Explanation of Any Payment or Gift to Respondents**

These data collections do not involve any payment or gift to respondents other than remuneration of grantees.

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

No assurances of confidentiality will be made

**11. Justification for Sensitive Questions**

These data collections do not contain any questions of a sensitive nature.

**12. Estimates of Annualized Burden Hours and Costs**

There are no new requirements and modifications because we just extended the TANF program through September 2011 under the claims Resolution Act of 2010.

The estimated burden hours for these information collections are:

<b>Instrument or Requirement</b>	<b>No. of Respondents</b>	<b>Yearly Submittals</b>	<b>Average Burden Hours per Response</b>	<b>Final Rule Total Annual Burden Hours</b>	<b>Interim Rule Total Annual Burden Hours</b>
<b>Preparation and Submission of Data Verification Procedures - §§ 261.60 - 261.63</b>	<b>54</b>	<b>1</b>	<b>640</b>	<b>34,560</b>	<b>34,560</b>
<b>Caseload Reduction Documentation Process, ACF-202 - §§ 261.41 &amp; 261.44</b>	<b>54</b>	<b>1</b>	<b>120</b>	<b>6,480</b>	<b>6,480</b>
<b>Reasonable Cause/Corrective Compliance Documentation Process - §§ 262.4, 262.6, &amp; 262.7; § 261.51</b>	<b>54</b>	<b>2</b>	<b>240</b>	<b>25,920</b>	<b>25,920</b>
<b>TANF Data Report - Part 265</b>	<b>54</b>	<b>4</b>	<b>2,201</b>	<b>475,416</b>	<b>473,688</b>
<b>SSP-MOE Data Report - Part 265</b>	<b>29</b>	<b>4</b>	<b>714</b>	<b>82,824</b>	<b>82,824</b>

Estimated total burden hours: 625,200

The hourly cost of the burden is estimated by multiplying 625,200 hours times \$50 (average cost per hour) for a total of \$31,260,000

### **13. Estimates of Other Total Annual Cost Burden to Respondents**

## **and Record Keepers**

There are no direct monetary costs to respondents other than the hourly burden cost noted in Item 12.

## **14. Annualized Cost to the Federal Government**

This item does not reflect any of the costs shown in items 12 and 13 of this Supporting Statement.

We estimate total annual Federal burden to be 40,000 hours. This includes the costs of information collection, development, tests, printing forms, mailing list compilation and maintenance, mailing or enumeration, editing, coding, tabulation, analysis, publication of results, technical assistance, and monitoring. 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 \$4,000,000.

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

There are no program changes or adjustments.

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

We began analyzing these data upon submission to ACF and will do so again at the end of each fiscal year after the States have transmitted the data to us. One of the primary purposes of these information collections is to provide us with the data to calculate participation rates as required by section 407(a) of the Social Security Act (SSA) as amended by PRWORA and DRA. These data will also provide us with the necessary information to carry out our other financial management and oversight responsibilities; and to document the work participation caseload reduction credit, and reduction in the penalty for failing to meet the work participation requirements. Other analyses will include, but not necessarily be limited to, analyses of the impacts

of various TANF provisions and descriptions of the characteristics of the populations served. We will publish these data in the TANF Annual Report to Congress.

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

Not applicable.

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

Not applicable.

**B. Collections of Information Employing Statistical Methods**

See attached sampling manual, which is applicable to the TANF Data Report and the SSP-MOE Data Report. The other instruments and requirements do not employ statistical methods.