

# **SUPPORTING STATEMENT**

2013

## **Form CB-496 Title IV-E Programs Quarterly Financial Report (Foster Care, Adoption Assistance and Guardianship Assistance Programs)**

### **A. Justification**

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

The authorities to collect and report the information requested on these forms are found in the following sections of the Social Security Act (Act): 471(a)(6), 471(a)(7), 471(a)(13) and 474(a) and (b).

State and Tribal agencies administering Plans approved under title IV-E of the Act are required to maintain complete records and a system to report: the amounts expended to administer and operate the program, and the disbursement of maintenance assistance payments.

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

The information collected through the use of these forms is used to:

- Monitor program operations and prepare technical assistance and guidance as needed;
- Compute the quarterly grant awards pursuant to section 474(b)(2) of the Act;

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

ACF maintains and operates an "On-Line Data Collection" (OLDC) system which is available to every State and Tribe through an Internet connection. Both ACF and OMB are currently drafting new requirements that all grantees use online data reporting. ACF currently requests every State and Tribe to enter its financial reports in this manner. This information is compatible with the "Grants Administration Tracking and Evaluation System" (GATES) and with GrantSolutions used within ACF to compute quarterly grant awards to each State and Tribe.

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

Information collected in these reports is not available through any other Federal source.

#### **5. Impact on Small Businesses and Other Small Entities**

This form applies only to State and Tribal governments. Small businesses are not involved.

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

This data is used quarterly to compute grant awards. Failure to collect expenditure, estimate and collection data on a quarterly basis would preclude the Department from accurately calculating these quarterly awards.

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

Collection of State financial data is consistent with guidelines. The information requested is necessary to satisfy statutory requirements.

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

Comments were solicited through the publication of a Federal Register notice, published November 25, 2012 (77 FR 70165 et. seq.), copy attached. Copies of this notice and of the proposed forms were distributed to each ACF Regional Office and, through them and through an Internet listserv, to all State IV-E agencies and interested Tribes.

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

No respondent to our requests for comments received any remuneration for their participation.

**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**

Number of Respondents	62
Responses per Respondent	4
Average Burden Hours per Response	20
<b>Total Burden Hours</b>	<b>4,960</b>

This burden hour estimate represents an increase of approximately 17.6 percent (744 hours) since 2010. This increase is primarily the result of the additional reporting required for the 30 additional demonstration projects to be approved during the FY 2012-2014 period and the anticipated inclusion of several additional Tribal grantees.

Assuming the average value of respondents' time at \$30.00 per hour, the estimated annual cost to the States is \$148,080 (4,936 hours @ \$30).

**13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers**

We estimate that this request will impose no additional financial cost burden on the respondents.

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

We estimate that this request will impose no additional financial cost on the Federal government.

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

We are proposing a burden increase of 744 hours based on program changes.

Legislation enacted in 2008 added the Guardianship Assistance Program to title IV-E and enabled Tribes to submit individual title IV-E plans for approval. Through the end of FY 2012, 33 States have had their title IV-E plan amendments approved to include the Guardianship Assistance Program and one Tribe has had its title IV-E plan approved to allow it to operate a separate title IV-E program. We anticipate a few State plan amendment approvals and several additional Tribal plan approvals in the next 3-year period.

Legislation enacted in 2011 enables ACF to approve up to thirty demonstration projects during the period of FY 2012 through FY 2014. Once approved, these projects will require substantial additional detailed reporting and the proposed revisions to the report will accommodate the additional reporting requirements.

**Note:** There are currently 53 respondents – 52 States and 1 Tribe. The burden hour estimate anticipates an additional 9 Tribal respondents, for a total of 62 respondents, in the next 3-year period.

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

In past years, information on these forms was published in aggregate and State-by-State formats and in combination with other data collected by this agency. The data has been published following each fiscal year as received from the States in an annual report available to the general public. No complex analytical techniques are required. We anticipate similar data collection and publication in the future to include data from the additional title IV-E program and the Tribal grantees.

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

The expiration date will be shown as needed.

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

None.

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

Statistical methods are not used in collecting this financial information. The information supplied by the States and Tribes must be auditable and in conformance with generally

accepted accounting principles and cannot be reported using sampling, estimating or other statistical methodologies

## ATTACHMENT A

### Comments On Proposed Changes to Form CB 496

Few substantive changes are being proposed on Part 1 of this form, completed by every grantee. As a result, few comments were received for either Part 1 or Part 2, a supporting document to Part 1.

- One comment requested that OLDC be reprogrammed to compute quarter-to-quarter variances to facilitate State explanations.

We are working with our contract programmers to determine the feasibility and ease of incorporating this change into the on-line programming.

- One comment suggested the addition of an additional data reporting non-SACWIS development costs.

There are already four data entry lines for SACWIS costs included on this document, which is sufficient for our current data needs. We will maintain this comment for subsequent information collection reviews.

- Several comments indicated that the comment provided on audit adjustments was insufficiently detailed to properly identify these entries.

We concur and have expanded both the physical space available for comments and the definition of the nature and detail of these comments.

Part 3 of this form is used only by those States or Tribes with approved Demonstration Projects under title IV-E. Under Public Law 112-34, the "Child and Family Services Improvement and Innovation Act" (September 30, 2011), Section 1130 of the Social Security Act was amended to allow ACF to approve up to ten child welfare waiver demonstration projects in each of FYs 2012 – 2014.

Although no specific comments were received, this legislation requires a substantial revision to the information collection in Part 3 of this form, developed following numerous discussions and meetings with Federal and grantee users of this data.

