# Supporting Statement for
# Title III Supplemental Form to
# Financial Status Report

## A. Justification

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

The Administration for Community Living (ACL) requires grantees funded under the Older Americans Act, P.L. 106-501, to report semi-annually on the financial status report of the performance of their projects. The specifications for reporting are consistent with 45CFR 92.40 (b)(1). The financial report is submitted on standard form OMB 425. The clearance requests a reinstatement with change of a previously approved collection.

Since the last clearance, the form has been updated to create efficiencies in grantee reporting and review by the ACL. All information collected on the current form was previously collected, the information is arranged differently to assist grantees in completing the form correctly.

### 2. Purpose and Use of Information Collection

The information submitted by State Agencies will be used by ACL/AoA to respond to statutory requirements relative to expenditures of Title III program funds, to effectively monitor use of funds, and to respond to Congress, OMB, GAO and others.

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

The information may be submitted in electronic format.

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

No other data source collects similar information.

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

This Information does not involve small businesses. It is collected from the 56 Title III State Agencies on Aging and the Supplemental Form, the submission is typically limited to two pages.

### 6. Consequences of Collecting the Information Less Frequent Collection

The Financial Status Report is a semi-annual report. If the reports were to be made less frequently, opportunities to monitor and provide needed guidance would not be available to grantees.

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

There are no special circumstances requiring explanation

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

- A 60-day Federal Register Notice was published in the *Federal Register* on April 11, 2014, vol. 79, No. 70; pp. 20212-3 (see attachment). There was one public comment.

- One comment was received on behalf of the National Association of State Long-Term Care Ombudsman Programs asking for an explanation of the revisions to the supplemental form to the financial status report. The Agency responded to the question explaining why changes were needed and provided a copy of the old form for comparison.

- The agency consulted with the State of Indiana in 2013 to review the proposed form, a grantee that would be required to complete the form. The State provided input on instructions and format which were taken into consideration in the revision of instructions and format of the form.

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

No payment was provided.

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

Data in the Financial Status Reports are not confidential. The information provided is financial and program data concerning the use of Federal funds.

**11. Justification for Sensitive Questions**

There are no questions of a sensitive nature required.

**12. Estimates of Annualized Burden Hours (Total Hours & Wages)**

12A. Estimated Annualized Burden Hours

| Type of Respondent | Form Name | No. of Respondents | No. Responses per Respondent | Average Burden per Response (in hours) | Total Burden Hours |
|---|---|---|---|---|---|
| **States and Territories** | Title III Supplemental | 56 | 2 | 2 | 224 |
| **Total** | | | | | **224** |

12B. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

| Type of Respondent | Total Burden Hours | Hourly Wage Rate | Total Respondent Costs |
|---|---|---|---|
| States & Territories: Accountant | 224 | $30.55 | $6,843.20 |
| Total | | | $6,843.20 |

Median Hourly Wage taken from the Department of Labor for the Accountants and Auditors.

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

There are no additional costs to the respondents other than their time.

**14. Annualized Cost to Federal Government**

Hours Used in Calculation:

a) Preparing ACL/AoA Supplemental Form, and instructions,
and request of OMB review:……………………………………………40 hours

b) Disseminating reporting instructions and Supplemental
Form to the network…………………………………………………….. 8 hours

c) Regional Office Review of Supplemental Form from each
State (1/2 hour for each of the 56 State Agencies)
is 28 x 2 per year……………………………………………………..56 hours

d) Analysis and computerization of
information submitted …………………………………………………40 hours

Total Government Hours…………144 hours

Government Salary for Corresponding 144 hours:

e) DC Salary Table 2010 GS-13-1 has a
yearly rate of $89,924 and an hourly rate of
$43.09 per hour. Estimated 140 hours……………………………………….$6,033

f) DC Salary Table 2010 GS-7-1 has a
yearly rate of $42,631 and an hourly rate of
$20.43 per hour. Estimated 4 hours…………………………………………...$82

Total Costs to Government…………$6,115

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

Since the last clearance, the form has been updated to create efficiencies in grantee reporting and review by the ACL. All information collected on the current form was previously collected, the information is arranged differently to assist grantees in completing the form correctly.

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

ACL/AoA normally issues a press release on newly funded projects. In addition, a

Compendium of Active Grants is posted on http://www.aoa.gov/AoaRoot/grants/Compendium/index.aspx each year.

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

The ACL/AoA will display the expiration date on the Supplemental Form to the Financial Status Report.

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

There are no exceptions to the certification.

**B. Collection of Information Employing Statistical Methods If statistical methods will not be used to select respondents and item 17 on Form 83-I is checked "No" use this section to describe data collection procedures.**

These collections do not employ statistical methods.