

SUPPORTING STATEMENT

Form ACF-696 T

Specific Instructions

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Administration for Children and Families (ACF) is authorized to collect and report the information requested under this form by the Child Care and Development Block Grant Act of 1990, as revised. Implementing regulations at 45 CFR 98.64 and 98.67 indicates that the Secretary shall require financial reports as necessary.

2. Purpose and Use of the Information Collection

Tribal agencies with approved Tribal plans for implementation of the CCDF program report the data on an annual basis. Failure to collect this data would seriously compromise ACF's ability to monitor expenditures.

3. Use of Improved Information Technology and Burden Reduction

ACF has developed a forms database that allows electronic data entry for the ACF-696T over the internet. In addition, an electronic copy of the ACF-696T form is available via the internet and, upon request, via e-mail attachment.

4. Efforts to Identify Duplication and Use of Similar Information

Information collected in this report is/will not be available through any other Federal source. No similar available information has been identified.

5. Impact on Small Businesses or Other Small Entities

These forms apply only to Tribal governments. Small businesses are not involved.

6. Consequences of Collecting the Information Less Frequently

Financial management of the program would be seriously compromised if the expenditure data in the form (ACF-696T) were collected on a less than annual basis. Federal policy presumes the strictest controls on funding documentation in support of claims for reimbursement.

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

No special circumstances are noted for this request for information collection.

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

The Federal Register Notice soliciting comments on the information collection was published on April 20, 2016 (Volume 81, p. 23302). No comments were received to the Federal Notice.

9. Explanation of Any Payment or Gift to Respondents

No provision for payment or gift to respondents applies to this collection.

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

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	HOURS PER RESPONSE	RESPONSE BURDEN
ACF-696T CCDF Financial Reporting Form for Tribes	272	1	7	1904

Total respondents of 272 (which may vary from year-to-year depending on a grantees applying for funding and complying with program plan submissions) with a total of one annual response at 7 hours per response equals a total of 1,904 annual hours requested. Assuming the value of respondents' time is \$25 an hour, the estimated cost is \$47,600 (1,904 total hours X \$25.00). Burden hour estimates were made using past experience with the formerly approved form.

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

No additional costs should be associated with this collection that are not already contained in questions 12 and 14.

14. Annualized Cost to the Federal Government

The estimated costs to the Federal Government includes the initial electronic publication and database mapping for retention of information and submission which costs are estimated at approximately \$6,500 per year for three years. We also estimate an

additional \$6,500 one-time to set up the importing of the payment data to the On-Line Data Collection System. All grantees are required to submit electronically unless they receive a waiver for paper submission. We assume that reviewing information submitted will take half of the time it takes the grantee to report the information, or roughly 3.5 hours per form. The estimated total annual cost to the Federal government includes information technology costs of \$26,000 and Federal personnel costs of \$23,800 for a total of \$49,800.

The reconciliation of payment data from (Standard Form 425) to expenditure data (ACF-696) is likely to have significant savings to the Federal Government. By requiring the grantee to consistently report the same financial data the Federal Government employees will likely need less time and effort reviewing data and coordinating adjustments between systems. This alone will save at least 2 hours of time per report submitted (272 respondents * 1 response *2 hours of effort * 25) \$13,600. Additionally, grant closeouts will be more efficient and timely to allow compliance with the Grants Oversight and New Efficiency Act (GONE Act, P.L. 114-117). Using the same assumptions, we estimate another \$6,800 in savings for close-out reconciliation efforts which were previously not part of the normal operations for financial form submission and review by Federal staff. We estimate a total savings \$20,400 because of these proposed changes to grantee financial reporting.

The total net costs to implement and support the form will be \$49,800 minus \$20,400 for total of \$29,400.

15. Explanation for Program Changes or Adjustments

Changes to reporting are due to improved uses of reporting technology and the Grants Oversight and New Efficiency Act (GONE Act, P.L. 114-117).

Grantee payment data from the Payment Management System (using the Standard Form 425) are being imported into the On-Line Data Collection System ACF-696T Form. This will ensure that grantee payments are reconciled with grantee expenditures allowing for proper management of the financial accounts, timely closeout of grants, reduced burden of grantees in reconciling financial data between two systems, and improve transparency of financial information.

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16. Plans for Tabulation and Publication and Project Time Schedule

There is no plan to publish information collected as a result of this form.

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

We will display the expiration date on the form.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

We are not aware of any exceptions to the certification statement identified on Item 18.