

# 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 is authorized under Title XX of the Social Security Act, as amended, and is codified at 42 U.S.C. §1397 through §1397e. The implementing regulations for this and other block grant programs authorized by Omnibus Budget Reconciliation Act of 1981 are published at 45 C.F.R. Part 96. Those regulations include both specific requirements and general administrative requirements in lieu of 45 CFR Part 92 (the HHS implementation of the A-102 Common Rule) for the covered block grant programs. Requirements specific to SSBG are found in 45 C.F.R. §96.70 through §96.74.

The 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 or organizations. 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 a Pre-Expenditure Report specifying the intended use of the block grant. No specific format is required for the Intended Use Plan. However, the report must include information on the types of activities to be supported, and the characteristics of individuals to be served (42 U.S.C. §1397c). The Pre-Expenditure Report is submitted annually to the Department of Health and Human Services (DHHS), Administration for Children and Families (ACF), Office of Community Services (OCS).

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 amount of carryover funds expended in the current fiscal year, and intended to be carried over into the next fiscal year.
5. The total amount of Federal, State and local funds spent in providing each service, including SSBG funds.
6. The method(s) by which each service was provided, showing separately the services provided by public and private agencies, or both.
7. Eligibility for services with each SSBG Service Category determined by the state.
8. State definitions of child, adult, and family as they relate to services provided by SSBG funds.
9. Assurances related to the appropriate use of TANF transfer funds, based on statute.

OMB form 0970–0234 was approved by OMB in 2014, and expires on November 30, 2017. To facilitate the collection of high quality SSBG data, renewal of the current Post-Expenditure Reporting form with modifications is being sought. The current approved form is available for States to complete electronically on the SSBG Portal. The SSBG Portal is a secure web-based data portal.

## **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 – 2014. The 2015 annual report is currently being finalized. The information contained in this report is used to establish how SSBG funding is used for the provision of services in each State. 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.

In addition, the Government Performance and Results Act of 1993 (GPRA) requires all Federal agencies to develop long-term Strategic Plans defining general goals and objectives for their programs; to develop Annual Performance Plans specifying measurable performance goals for all of the program activities in their budgets; and to publish an Annual Performance Report showing actual results compared to each annual performance goal. Toward this end, two performance measures were developed to improve efficiency and accountability within States' SSBG programs. The first of these measures aims to minimize administrative costs and maximize the amount of funds used for the provision of direct services. The second performance measure analyzes States' Intended Use Plans and reported expenditures to determine the degree to which States spend SSBG funds in a manner consistent with their intended use as required by the Federal law [42 U.S.C. §1397e (a)]. These performance measures require both pre-expenditure and post-expenditure data.

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

States will be able to submit pre-expenditure and post-expenditure data on the SSBG Portal. The SSBG Portal is a secure web-based data portal. The SSBG Portal allows for more efficient data submission without increasing the overall burden on States. It provides a user-friendly means for States to submit and access their pre-expenditure, post-expenditure, and recipient data.

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

The SSBG Portal is the only instrument for collecting data on estimated and actual expenditures for, and recipients of, the 29 SSBG-supported service categories.

## **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 U.S.C. 1397e]. This information is critical for understanding the impact of SSBG funding and for assessing States on the two SSBG program performance measures.

## **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 for those following the State Fiscal Year is due December 30 annually and is due March 30 annually for those following the Federal Fiscal Year. The Post-Expenditure Reporting Form proposed does not significantly deviate from the form that States currently use. The use of the Post-Expenditure Reporting form as part of States' Intended Use Plans 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.

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

Respondents are required to submit pre-expenditure data and post-expenditure to the Portal. The narrative of the pre-expenditure report can be uploaded to the SSBG portal as well.

- **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 two-year funding period only. 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.

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

Three comments were made during the first 60 day federal register notice (Vol. 82, FR 2206, published 5/11/2017) comment period. These three comments were to request a copy of the draft SSBG Post-Expenditure Report intended for review and response by OMB. The tool was submitted to requestors, and since that time, no further comments have been received by the office.

#### **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 is 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					6,272

See Attachment A. SSBG Reporting Form Post-expenditure  
 See Attachment B. Instruction for SSBG Reporting Form

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

Using an estimate of \$47.93 for the salary of the State employee completing this report, the estimated cost to each State to complete the report is \$5,368.16.

The annual burden is based upon the average hourly salary of finance managers, financial analysts, and social and community service managers based on May 2015 Occupational Employment Statistics from the Bureau of Labor and Statistics.

Type of Respondent	Burden Hours	Hourly Wage Rate	Respondent Costs
State employee	110	\$47.93	\$5,272.30
State employee	2	\$47.93	\$95.86
Total			\$5,368.16

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

Grantees have no out-of-pocket costs.

**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	\$ 41,853	\$ 43,182	\$ 44,511	\$ 43,182
Contractor Staff	\$ 156,123	\$ 168,255	\$ 179,930	\$ 168,103
Total	\$ 197,976	\$ 211,437	\$ 224,441	\$ 211,285

The dollar amounts displayed for the Office of Community Services represents a portion of two Federal staff salaries at a GS-12 level to perform the duties of a social services program specialist.

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

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

The proposed minor modifications to the SSBG Post-Expenditure Report (OMB No: 0970-0234 Expiring 11/30/2017), seek to consolidate information that would be stored or transmitted elsewhere into a singular reporting form, allowing the OCS to better analyze the use of SSBG funds and provide guidance to improve States' compliance with statutory requirements and improve efficiency in grant administration. States voluntarily may use the modified Post-Expenditure Reporting form to estimate expenditures and recipients, by service category, as part of the required annual Intended Use Plan.

**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 2017 annual report is as follows:

- States that report on a State Fiscal Year, which will end on June 30, 2017, will submit the Post-Expenditure Report for 2017 by December 30, 2017.
- States that report on the Federal Fiscal Year, which will end on September 30, 2017, will submit their Post-Expenditure Reports for 2017 by March 30, 2018.
- A draft report will be submitted to OCS for review in January 2019.

- The second draft will be submitted for clearance within ACF in February 2019.
- The final report will be submitted for review by OA in March 2019.
- The annual report will be submitted for publication in May 2019.

**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.