

**Form ACF-196:
Temporary Assistance for Needy Families (TANF) Quarterly
Financial Report**

**OMB Information Collection Request
0970 - 0247**

**Supporting Statement Part A -
Justification**

January 2020

Submitted By:

Office for Family Assistance
Administration for Children and Families
U.S. Department of Health and Human Services

SUPPORTING STATEMENT A – JUSTIFICATION

Summary

1. Circumstances Making the Collection of Information Necessary

The ACF 196 is the form used by states to revise expenditure data for fiscal years (FYs) prior to FY 2015.

Failure to collect the data would seriously compromise ACF's ability to monitor TANF expenditures, estimate outlays or to share accurate expenditure data with the public. Authority to require financial reports is contained in section 402 of the Social Security Act, as amended by Public Law 104-193, the Personal Responsibility and Work Opportunity Reconciliation Act of 1996. (42 USC 602).

Legislative citations requiring this collection include: 401(c)(1), 409 (a)(7) and 409 (a)(1). The following regulatory citations are relevant as well: 45 CFR Parts 265.3 through 265.9. States are required to report quarterly.

2. Purpose and Use of the Information Collection

ACF uses the financial data provided by states to assess compliance with statutory and regulatory requirements relating to administrative costs and state matching requirements. Without the data captured by the ACF 196, the agency's ability to monitor and report on TANF grants would be compromised.

3. Use of Improved Information Technology and Burden Reduction

To the extent that a state can complete its financial estimates and reports faster and more efficiently electronically, the burden is reduced. Under regulation (45 CFR 265.6) states are required to submit reports electronically.

4. Efforts to Identify Duplication and Use of Similar Information

ACF has identified no alternative sources of similar or duplicate information.

5. Impact on Small Businesses or Other Small Entities

These requirements have no impact on small businesses or entities.

6. Consequences of Collecting the Information Less Frequently

Reporting on the ACF-196 is limited to states with grant awards prior to FY 2015 that have not been closed and only if there is a correction or adjustment to spending from those fiscal years prior to FY 2015. For these states, without prompt changes to the ACF 196 in the event of a correction or adjustment to prior spending, ACF would be unable to exercise fiscal oversight in a responsible manner.

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

Not applicable.

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

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on November 25, 2019, Volume #84, Number #227, page #64906, and provided a sixty-day period for public comment. We have not received any comments.

9. Explanation of Any Payment or Gift to Respondents

No payments and/or gifts will be provided to respondents.

10. Assurance of Confidentiality Provided to Respondents

The information collected is not confidential.

11. Justification for Sensitive Questions

None of the information requested from state agencies is of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
ACF-196	5	1	5	25	25	34.44	861
Estimated Annual Burden Total:						Estimated Annual Cost Total:	861

Only five states have unobligated funds from prior to FY 2015, and these states may need to make corrections or adjustments to these earlier grant awards. We would expect that the adjustments would be relatively minor, accounting for no more than 5 hours of work per state.

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2018 is \$17.22 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$34.44. The estimate of annualized cost to respondents for hour burden is \$34.44 times 25 hours or \$861.

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

There are no additional direct monetary costs.

14. Annualized Cost to the Federal Government

The annual Federal costs associated with Regional and Central Office staff reviewing and processing the state TANF financial reports is estimated to be \$861. This is based on the estimate that only 5 states might need to make revisions to expenditure data from prior to FY 2015, for a total of 5 hours for the year, at an average cost of \$34.44 per hour (including overhead, fringe benefits, etc.).

15. Explanation for Program Changes or Adjustments

Five states have unobligated funds from prior to FY 2015: Arkansas (2013, 2014), Hawaii (2014), New York (2013, 2014), Tennessee (2013, 2014), and Wyoming (2014). When they spend these funds, they would report them on the ACF-196R, but as long as the grant awards remain open, there is a possibility that one of these states may make a correction to one of these earlier periods.

16. Plans for Tabulation and Publication and Project Time Schedule

Section 411(b) of the Personal Responsibility and Work Opportunity Act of 1996 requires the Secretary to submit a report to Congress each year that includes expenditures under each state's TANF program. ACF uses the information that is in the TANF financial reports as an important source of the information used to compile certain sections of this report. The 12th report to Congress includes financial data published on our web site at:

<https://www.acf.hhs.gov/ofa/resource/twelfth-report-to-congress>

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

We will display the new OMB approval expiration date on the ACF-196.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.