

**Supporting Statement for  
Title III Supplemental Form to  
Financial Status Report (SF-425) OMB 0985-0004**

**A. Justification**

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The Administration for Community Living (ACL) requires grantees funded under the Older Americans Act, P.L. 116-131, to report semi-annually on the financial status report of the performance of their projects. The specifications for reporting are consistent with 45CFR75.342(b)(1). The financial report is submitted on standard form 425.

The *Title III Supplemental Form to the Financial Status Report (SF-425)* is used by ACL/AoA for all grantees to obtain a more detailed understanding of how projects funded under Title III of the Older Americans Act (OAA) of 1965, as amended, are being administered, and to ensure compliance with legislative requirements, pertinent Federal regulations and other applicable instructions and guidelines issued by the ACL. The level of data detail necessary is not available through the Federal Financial Status Report (SF-425) form. The Title III Supplemental Form provides necessary details on non-federal required match and expenditures for services, administration, and Long Term Care Ombudsman expenditures.

The accompanying instructions for completing the Title III Supplemental Form to the Financial Status Report were updated to delete information on maximum expenditure requirements for Older Relative Caregivers and updated the maximum allowable expenditure amounts for State Plan Administration that was updated in the most recent reauthorization of the Older Americans Act P.L. 116-131.

Since the last clearance, the form remains unchanged. All information collected on the current form was collected in the previous form.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current 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. Describe whether, and to what extent, the collection of information involves the use**

**of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission or responses, and the basis for the decision of adopting this means of collection. Also, describe any consideration given to using technology to reduce burden.**

The information may be submitted in electronic format.

**4. Describe efforts to identify duplication.**

No other data source collects similar information.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

This Information does not impact small businesses or other small entities. It is collected from the 56 Title III State Agencies on Aging. The submission is typically limited to two pages.

**6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

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. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **Requiring respondents to report information to the agency more often than quarterly;**

None

- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

None

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

None

- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

None

- **In connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;**

None

- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

None

- **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 that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

None

- **Requiring respondents to submit proprietary trade secrets, 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.**

None

- 8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.**

ACL published a 60-day Federal Register Notice in the Federal Register soliciting public comments on this request. The 60-day FRN published on August 19, 2020 Volume 85, Number 161, pages 51033-51034.

The 60-Day notice requested comments on the information collection burden related to the proposed Supplemental Form to the Financial Status Report (SF-425) for all ACL/AoA Title III Grantees. No comments were received related to the 60-Day notice.

The current forms were developed after extensive outreach to stakeholders. The ACL conducted four webinars in October of 2020 with interested parties to ensure that stakeholders understood the form. Grantees input from these trainings are used when updating and reviewing the form.

- 9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees with meaningful justification.**

None

- 10. Describe any assurance of confidentiality provided to respondents and the basis for**

**the assurance in statute, regulation, or agency policy.**  
 No assurances of confidentiality are provided.

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

This data collection does not include any questions of a sensitive nature.

- 12. Provide estimates of the hour burden of the collection of information. The state should:**

The Title III Supplemental to the SF-425 includes an estimated hour burden per respondent of two hours in 2020. This estimate remains the same as the burden estimated the last time the data collection was approved. In addition, the number of respondents, 56, has not changed since the previously approved document.

**If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours).**

N/A. This approval only covers one form.

**Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

There are 56 respondents who provide two responses a year per respondent. The average burden per response is 2 hours. Multiplying 56 respondents' times 2 hours equals 112 hours for each submission or 224 hours per year. The cost for each year, in which the form is submitted twice, is estimated by multiplying 224 hours times the median wage for Accountants and Auditors of \$34.40/hour. This results in a total cost of \$7,705.60 (224 times \$34.40 equals \$7,705.60). The wage rate came from the May 2019 National Occupational Employment and Wage Estimates report from the Bureau of Labor Statistics. Doubling this amount to take into account benefits and overhead costs brings the total to \$15,411.20.

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

<b>Type of Respondent</b>	<b>Total Burden Hours</b>	<b>Hourly Wage Rate</b>	<b>Total Costs for Salaries</b>	<b>Benefits and Overhead</b>	<b>Total Respondent Costs</b>
States & Territories	224	\$34.40	\$7,705.60	100%	\$15,411.20
Total			\$7,705.60		\$15,411.20

- 13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

**Total Annualized Capital/Startup Cost:**

**Total Annual Costs (O&M):**

**Total Annualized Costs Requested:**

No additional costs are incurred by respondents other than those specified in #12.

- 14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and other expenses that would not have been incurred without this collection of information.**

The cost to update the ACL/AoA Supplemental Form, instructions, and request for OMB review equals approximately 40 hours, and disseminating reporting instructions and the supplemental form to the State Agencies on Aging network equals 8 hours. The ACL review of the supplemental form from each state (1/2 hour for each of the 56 State Agencies) equals 56 hours (28 hours times 2 collections per year). In addition, analysis and data input of information submitted equals 40 hours. Combined, the hours used in the calculation are a total of 144 hours by Federal employees.

The average review and approval of a Title III Supplemental form takes approximately 140 hours for the GS-13-1 and 4 hours for the GS-07-1 for a total of 144 Government hours. An ACL GS-13-1 staff reviewing the completed reports is paid at an average rate

of \$49.19 per hour and the GS-07-1 staff reviewing the completed reports is paid at an average rate of \$23.32. The cost of the review and approval process is estimated at 140 hours x \$49.19 per hour equals \$6,886.60 and 4 hours x \$23.32 equals \$93.28 for a grand total of \$6,979.88. Doubling this amount to take into account benefits and overhead costs brings the total to \$13,959.76.

<b>Type of Respondent</b>	<b>Total Burden Hours</b>	<b>Hourly Wage Rate</b>	<b>Total Cost of Salaries</b>	<b>Benefits and Overhead</b>	<b>Total Federal Costs</b>
GS-13-1	140	\$49.19	\$6,886.60	100%	\$13,773.20
GS-7-1	4	\$23.32	\$93.28	100%	\$186.56
Total			\$6,444.92		\$13,959.76

**15. Explain the reasons for any program changes or adjustments.**

There are no program changes or adjustments to the currently approved annual burden or total number of respondents.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Upon Office of Management and Budget approval, ACL plans to formally transmit the approved Title III Supplemental form with instructions to the State Agencies on Aging network.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The OMB approval number and expiration date will be displayed.

**18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.**

There are no exceptions to the certification statement.