

TANF Expenditure Report – ACF 196R

**OMB Information Collection Request
0970 - 0446**

Supporting Statement Part A - Justification

November 2020

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

SUPPORTING STATEMENT A – JUSTIFICATION

Summary

This request is for a revision to a previously approved information collection, TANF Expenditure Report – ACF 196R (OMB #0970-0446).

1. Circumstances Making the Collection of Information Necessary

Form ACF-196R is used by states administering the Temporary Assistance for Needy Families (TANF) program to report on quarterly expenditure data and to request quarterly grant funds from the federal awarding agency. Failure to collect the data would seriously compromise the Office of Family Assistance (OFA) and the Administration for Children and Families' (ACF) ability to monitor TANF expenditures and compliance with statutory requirements. These data are also needed to estimate outlays and to prepare reports and budget submissions for Congress.

2. Purpose and Use of the Information Collection

ACF and OFA use this data to compute quarterly grant awards and to assess compliance with statutory and regulatory requirements relating to use of funds, administrative costs, and state maintenance-of-effort requirements. Without the data captured by the ACF-196R, the agency's ability to monitor TANF grants would be compromised.

The ACF-196R form includes a Part 1 and a Part 2. Part 1 collects financial data from states. Part 2 requires states to provide additional information regarding several general categories of spending (Assistance Authorized Solely Under Prior Law, Non-Assistance Authorized Solely Under Prior Law, and Other) and the methodology used to estimate any expenditure reported.

3. Use of Improved Information Technology and Burden Reduction

Federal regulations at 45 CFR 265.6 require that reports for this program be submitted online through the ACF On-Line Data Collection (OLDC) system. Likewise, in accordance with ACF policy published in the Federal Register June 28, 2013 (78 FR 38989 et. seq.), financial reports for all ACF grant programs are submitted electronically, either through OLDC or through the HHS Payment Management System (PMS). Paper copies of these reports are no longer being accepted either by mail, by fax, or as an email attachment. (See ACF Office of Grants Management Action Transmittal, OGM-AT-13-01, September 25, 2013.)

4. Efforts to Identify Duplication and Use of Similar Information

Information collected in this report is not available through any other federal source.

5. Impact on Small Businesses or Other Small Entities

This form is completed by state governments only. Small businesses and other entities are not involved.

6. Consequences of Collecting the Information Less Frequently

ACF and OFA use this data to compute quarterly grant awards, as required by law. Failure to collect expenditure and estimate data on a quarterly basis would preclude the Department of Health and Human Services from accurately calculating and issuing these awards in a timely manner.

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

Collection of state financial data is consistent with guidelines at 5 CFR 1320.5. The information requested is necessary to satisfy statutory requirements.

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 September 22, 2020, Volume 85, Number 184, page 59529, and provided a sixty-day period for public comment. During the notice and comment period, we did not receive 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

Instrument	Total	Total	Average	Total	Annual	Average	Total Annual Cost
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	Number of Respondents	Number of Responses Per Respondent	Burden Hours Per Response	Burden Hours	Burden Hours	Hourly Wage	
ACF – 196R	51	12	14	8,568	2,856	\$90.54	\$258,582.24
Estimated Annual Burden Total:					2,856	Estimated Annual Cost Total:	\$258,582.24

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Business and Financial Operations Occupations 13-2099 and wage data from May 2019¹, which is \$45.27 per hour. To account for fringe benefits and overhead, the rate was multiplied by two, which is \$90.54.

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

We estimate federal staff will require 2 hours to review and analyze each of the 204 reports submitted during a fiscal year (51 respondents x 4 reports per year), for a total of 408 hours per year. Using an estimate of \$41.80 per hour, the hourly federal GS-12, “Rest of US” employee rate, the annualized cost is \$17,054 (408 hours x \$41.80 per hour = \$17,054).

15. Explanation for Program Changes or Adjustments

ACF modified the form instructions to remove detailed instructions for the ACF-196 report (OMB #0970-0247) and instead only include instructions for the singular ACF-196R report. ACF has also clarified some instructions that have generated confusion for states and has reorganized the format and chronology of section headers and associated guidance to better reflect the flow of the TANF reporting process.

The estimated number of respondents and time to complete the form has not changed.

16. Plans for Tabulation and Publication and Project Time Schedule

¹ <https://www.bls.gov/oes/current/oes132098.htm>

Section 411(b) of the Social Security Act requires the Secretary to submit a report to Congress each year that includes expenditures under each state's TANF program. Information collected from the quarterly ACF-196R financial report is an important source of the information used to compile certain sections of the report to Congress. Financial data are also published on our website at <http://www.acf.hhs.gov/programs/ofa/programs/tanf/data-reports>.

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

Not applicable. OMB expiration date will be shown as required.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.