

# **Generic Clearance for Financial Reports used for ACF Mandatory Grant Programs**

**OMB Information Collection Request  
0970 - 0510**

## **Supporting Statement Part A - Justification**

**February 2021**

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

## SUPPORTING STATEMENT A – JUSTIFICATION

### Summary

This request is for an extension with no changes to a previously approved overarching generic clearance. The Supporting Statement has been updated to provide additional detail about the potential generic information collections submitted under this umbrella, but the proposed types of information collections and purpose and use of the collected information has not changed.

#### 1. Circumstances Making the Collection of Information Necessary

This information collection request (ICR) is to continue use of the umbrella generic: Generic Clearance for Financial Reports used for ACF Mandatory Grant Programs (0970-0510). Generic Information Collections (GenICs) under this umbrella consist of forms for recipients of mandatory grant funding to submit financial information to the Administration for Children and Families (ACF).

The authorities to collect and report the information requested on these forms are found in various statutes and Public Laws. For example, Titles IV-A, IV-D and IV-E of the Social Security Act, the “Child Care and Development Block Grant Act,” as amended, and the “Immigration and Nationality Act of 1952,” as amended. Mandatory grant funding recipients must have program administration plans approved by ACF and are required by several statutes and Federal regulations applicable to HHS programs, including 45 CFR Part 75, to maintain complete records and a system to report this information to ACF on a regular basis.

ACF programs require detailed financial information from their grantees that allows ACF to monitor various specialized cost categories within each program, to closely manage program activities, and to have sufficient financial information to enable periodic thorough and detailed audits.

The information included on the standard Federal Financial Report Form (SF-425; OMB #4040-0014) provides only minimal, bare-bones, non-program specific financial information insufficient for these purposes. This generic clearance allows ACF programs to efficiently develop and receive approval for financial reports that are tailored to specific funding recipients and the associated needs of the program.

#### 2. Purpose and Use of the Information Collection

Financial information that is specific to funding recipient activities and the requirements in a funding opportunity announcement is critical to allow ACF program offices the ability to track funding in appropriate ways, allowing programs to monitor use of ACF funds and ultimately protect federal interests.

The information collected through GenICs under this umbrella clearance is used to:

- a. Monitor program operations and prepare technical assistance and guidance as needed
- b. Assess the effect of program changes and make informed decision
- c. Assist in the computation of the grant awards issued to each program’s grantees

- d. Assist in the computation of the Child Support Enforcement program's annual incentive payments
- e. Determine that child support collections are being properly distributed (Child Support Enforcement Program only)
- f. Ensure funding recipients are meeting funding requirements established by Congress
- g. Produce annual financial and statistical reports as may be required by Congress and respond to periodic detailed inquiries from Congress

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

In accordance with ACF policy published in the Federal Register June 28, 2013 (78 FR 38989 et. seq.) all grantees are required to electronically file financial reports online. ACF maintains OLDC, the "On Line Data Collection" system as the electronic online data entry portal for recipients of ACF grant funds.

All grantees for these programs submit their financial data online. The financial data entered by each grantee for these programs is transferred to GrantSolutions, or other programs, where it is available for thorough review and approval by Federal financial staff.

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

Information collected in these financial reports is not available through any other federal source.

### **5. Impact on Small Businesses or Other Small Entities**

These forms are completed only by the state, territories, and tribal governmental agencies administering these programs. Small businesses and other entities are not involved.

### **6. Consequences of Collecting the Information Less Frequently**

The financial data collected through the individual GenICs is most commonly collected on a quarterly basis. The information is used extensively by each program to actively monitor program activities and to address needs in a timely manner, so is needed on a quarterly basis. Additionally, failure to collect this data on a quarterly basis would preclude the Department 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. 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 July 9, 2020, Volume 85, Number 132, page 41241, and provided a sixty-day period for public comment. We did not receive comments on the proposed collection of information.

In addition to the solicitation for comment in the Federal Register Notice, each of these financial reporting forms for each of these separate ACF mandatory grant programs is constantly being reviewed by ACF financial staff in headquarters and the ten Regional Offices. Whenever it becomes necessary to revise or change any of these forms, advice and suggestions are solicited directly with program grantees and any affiliated advocacy groups to assure the changes are rational and reasonable and meet the requirements of Federal law and the ability of grantees to provide the requested information.

**9. Explanation of Any Payment or Gift to Respondents**

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

**10. Assurance of Confidentiality Provided to Respondents**

Not applicable for these financial reports.

**11. Justification for Sensitive Questions**

Data collected are not of a sensitive nature.

**12. Estimates of Annualized Burden Hours and Costs**

The total burden request under this extension includes the previously approved and ongoing burden and the estimated burden over the next 3 years. The total requested burden under this OMB # is 151,941 hours. The tables below provide details for these estimates.

***Previously Approved and Ongoing***

<b>Information Collection Title</b>	<b>Total Number of Respondents</b>	<b>Annual Number of Responses Per Respondent</b>	<b>Average Burden Hours Per Response</b>	<b>Annual Burden Hours</b>	<b>Total Burden Hours</b>
<b>Form CB-496: Title IV-E Programs Quarterly Financial Report</b>	67	4	25	6,700	20,100

<b>Child Care and Development Fund (CCDF) ACF-696 Financial Report for States and Territories</b>	56	4	5	1120	3,360
<b>Child Care and Development Fund (CCDF) ACF-696T Financial Report for Tribal Grantees</b>	221	1	7	1547	4,641
<b>Form OCSE-396: Child Support Enforcement Program Quarterly Financial Report</b>	54	4	6	1,296	3,888
<b>Form OCSE-34: Child Support Enforcement Program Quarterly Collection Report</b>	114	4	14	6,384	19,152
Totals:				17,047	51,141

**Estimated Burden and Costs for Future Requests**

The following burden estimates are for future GenICs under this umbrella generic. Updated burden estimates are based on the use over the past three years and anticipated need in the upcoming three years.

Information Collection Title	Total Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Total Burden Hours	Average Hourly Wage	Total Annual Cost
Mandatory Grant Financial Reports	700	4	12	33,600	100,800	48.54	\$1,630,944

The costs per respondent are expected to vary based on program and the specific GenIC request. Each program-specific GenIC will provide information about cost estimates for that specific information collection. We have estimated a general overarching estimate here, based on Bureau of Labor Statistics data from 2019 for 21-0000 Community and Social Service Occupations (job code 21-0000; <https://www.bls.gov/oes/current/oes210000.htm>). The mean national hourly wage for this occupation is \$24.27. Multiplying this by two (to account for fringe benefits and overhead) results in an average hourly cost of \$48.54. The estimate of annualized cost to respondents for hour burden is thus \$48.54 times burden hours or \$4,892,832 over three years, or \$1,630,944 annually.

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

Federal grantees are required to maintain extensive and accurate accounting records as a condition of receiving any federal grant. Any costs associated with collecting and maintaining this information is, generally, considered an administrative cost allocated to each program, as appropriate, and is eligible for federal funding. As such, there is no additional cost burden to respondents to provide the information being requested on these financial reporting forms.

### **14. Annualized Cost to the Federal Government**

We estimate costs to the federal government for all GenICs submitted under this generic to be about \$400,000 per year. This includes the initial cost of incorporating periodic form changes into online programming, using collected data in the computation of quarterly Notices of Award, tabulating and analyzing collected data, and publishing aggregate information in an annual report. The costs will vary by program office and by activity, though, and each program-specific GenIC will provide information about costs to the federal government.

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

This request is for an extension with no changes to a previously approved overarching generic clearance. We have updated burden estimates based on the needs over the past three years and also to accurately show total versus annual burden amounts.

### **16. Plans for Tabulation and Publication and Project Time Schedule**

Information on these forms is published in aggregate and state-by-state or tribe-by-tribe formats and in combination with other programmatic data collected by ACF. The data are published following each fiscal year, once received from every grantee, in an annual report available to the general public. Any additional plans for sharing information will be specified in each program-specific GenIC. No complex analytical techniques are required.

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

Such approval is not being sought; the expiration date will be shown as needed.

### **18. Exceptions to Certification for Paperwork Reduction Act Submissions**

None.