

Form ACF-196T

Tribal TANF Financial Report

OMB Information Collection Request

0970 - 0345

**Supporting Statement Part A -
Justification**

February 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

This request is for an extension with no changes to the information collection form. There were updates made to the instructions for clarification purposes.

1. Circumstances Making the Collection of Information Necessary

The Administration for Children and Families (ACF) is authorized to collect and report the information requested under this form by the Block Grants to States Temporary Assistance for Needy Families. Implementing regulations at 45 CFR Part 286.255 (C) for tribes indicates the requirements for financial reports as necessary.

2. Purpose and Use of the Information Collection

Tribal agencies with approved Tribal plans for implementation of the TANF program report the expenditure data on an annual basis. ACF uses this information to monitor expenditures and failure to collect this data would seriously compromise ACF's ability to do so.

3. Use of Improved Information Technology and Burden Reduction

ACF has developed a forms database that allows electronic data entry for the ACF-196T over the internet. In addition, an electronic copy of the ACF-196T form is available via the internet within the Online Data Collection system.

4. Efforts to Identify Duplication and Use of Similar Information

Information collected in this report is/will not be available through any other Federal source. No similar available information has been identified.

5. Impact on Small Businesses or Other Small Entities

These forms apply only to Tribal governments. Small businesses are not involved.

6. Consequences of Collecting the Information Less Frequently

Financial management of the program would be seriously compromised if the expenditure data were collected on a less than quarterly basis. Federal policy presumes the strictest controls on funding documentation in support of claims for reimbursement.

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

No special circumstances are noted for this request for information collection.

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 December 30, 2019, Volume #84, Number #249, page #71952-71953, and provided a sixty-day period for public comment. We have not received any comments to date.

9. Explanation of Any Payment or Gift to Respondents

No provision for payment or gift to respondents applies to this collection.

10. Assurance of Confidentiality Provided to Respondents

There are no data collected that require confidentiality.

11. Justification for Sensitive Questions

Data collected are not of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

Information Collection Title	Total Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
ACF-196T	75	4	1.5	450	\$34.44	\$15,498
Estimated Annual Burden Total:				450	Estimated Annual Cost Total:	\$15,498

There are 75 respondents, each providing 4 responses per year, requiring an estimated 1.5 hours per response, which equals a total of 450 burden hours requested.

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 450 hours or \$15,498.

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

No additional costs should be associated with this collection that is not contained in questions 12 and 14.

14. Annualized Cost to the Federal Government

The estimated costs to the Federal Government includes the initial electronic publication and database mapping for retention of information and submission which costs are estimated at approximately \$19,500 (or \$6,500 per year x three years).

All 75 Tribal TANF grantees are required to submit Form ACF-196T through ACF's On Line Data Collection system (OLDC).

We estimate it requires approximately 30 minutes of Federal staff time to access, review, analyze and approve each online submission from each respondent. At the hourly rate of \$36.76 per hour, this will cost \$5,514 (75 respondents x 4 responses x 0.5 hours per response x \$36.76). (The hourly rate of pay is based on the current year Federal General Schedule, "Rest of U.S." hourly rate of pay for a GS-12, Step 1 employee.)

When combined with publication and database mapping costs, above, the estimated total annual cost to the Federal government is \$12,014.

15. Explanation for Program Changes or Adjustments

There are no changes to the form. The number of respondents has changed since the last approval from 72 to 75 due to current number of ACF Tribal TANF grantees.

16. Plans for Tabulation and Publication and Project Time Schedule

There is no plan to publish information collected as a result of this form.

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

We will display the expiration date on the form.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

We are not aware of any exceptions.