Social Services Block Grant (SSBG) Post-Expenditure Report, Pre-Expenditure, and Intended Use Plan

OMB Information Collection Request
0970-0234

Supporting Statement Part A - Justification

February 2024

Type of Request: Revision

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

The Administration for Children and Families (ACF) is requesting a revision to the Social Services Block Grant (SSBG) Post-Expenditure Report, Pre-Expenditure Report, and Intended Use Plan (OMB #0970-0234). ACF is proposing to modify four column titles on the pre-and post-expenditure reports. The proposed changes will clarify for grant recipients what data they should include, which will increase their accuracy in reporting and minimize the need for resubmission to address incorrect data.

1. Circumstances Making the Collection of Information Necessary

The Social Services Block Grant (SSBG) program is authorized under Title XX of the Social Security Act, as amended, and is codified at 42 U.S.C. §1397 through §1397e. The implementing regulations for this and other block grant programs authorized by the Omnibus Budget Reconciliation Act of 1981 are published at 45 C.F.R. Part 96. Those regulations include both specific requirements and general administrative requirements instead of 45 CFR Part 92 (the HHS implementation of the A-102 Common Rule) for the covered block grant programs. Requirements specific to SSBG are found in 45 C.F.R. §96.70 through §96.74.

The SSBG program provides funds to States, the District of Columbia, Guam, Puerto Rico, American Samoa, the Virgin Islands, and the Commonwealth of the Northern Mariana Islands (hereinafter referred to as States) to support social services for adults and children in support of five statutory goals (42 U.S.C. §1397). Funds are allocated to the States based on population as block grants for the administration of their social services programs.

Within specific legal limitations (42 U.S.C. §1397d), States have substantial discretion in the use of funds and may determine what services will be provided, who will be eligible, and how funds will be distributed among the various services. State or local SSBG agencies (i.e., county, city, and regional offices) may provide the services or purchase them from qualified agencies or organizations. States report recipients of SSBG-funded services as any individuals who receive a service funded, in whole or in part, by SSBG.

Before a State receives SSBG funds, it must provide information specifying the intended use of the block grant. Annually, states must provide the ACF Office of Community Services (OCS) with information on the types of activities to be supported, the characteristics of individuals to be served, and the estimated amount of SSBG funding that will be allocated to each service category (42 U.S.C. §1397c). Historically, there was no specific format required for states to submit this information and ACF recommended that grant recipients use the post-expenditure reporting form to identify the intended use of funding estimates. A state's plan for the intended use of funds is used to provide funding OCS with pre-expenditure estimates, which are most commonly provided through the post-expenditure reporting form and are referred to as the pre-expenditure report. The estimated burden for the submission of pre-expenditure report data has historically been included within the burden estimates for the SSBG Post-Expenditure Report (0970-0234).

Information reported includes an annual total of adults and children served and expenditures in each of the 29 service categories. Post-expenditure reporting requirements for SSBG are codified at 45 C.F.R. § 96.74. States must submit their annual Post-Expenditure Report within 6 months of the end of the period covered by the report, and must address:

- The number of individuals (broken out by children, adults aged 59 and younger, adults aged 60 and older, and adults of unknown age) who receive services paid for in whole, or in part, with Federal funds under the SSBG.
- The amount of SSBG funds spent in providing each service.
- The amount of funds transferred into SSBG from the Temporary Assistance for Needy Families (TANF) block grant.
- The amount of carryover funds expended in the current fiscal year and intended to be carried over into the next fiscal year.
- The total amount of Federal, State, and local funds spent in providing each service, including SSBG funds.
- The method(s) by which each service was provided, showing separately the services provided by public and private agencies, or both.
- Eligibility for services with each SSBG Service Category determined by the state.
- State definitions of child, adult, and family as they relate to services provided by SSBG funds.
- Assurances related to the appropriate use of TANF transfer funds, based on statute.

This request is to extend approval of all materials approved under this OMB number and to make minor updates to the standard pre-and post-expenditure reports. Specifically, we have modified four column titles on the standard pre-and post-expenditure reports, which are required of states to report planned and actual expenditures of SSBG funds, respectively. The proposed changes will clarify what data to include, which will increase accuracy in reporting and assessment for grant recipients and federal staff. We would like to implement these changes prior to the current OMB expiration date of May 31, 2024.

2. Purpose and Use of the Information Collection

Information collected on the Post-Expenditure Report is analyzed and described in an annual report produced by OCS. The report is available for grant recipients, federal partners, and stakeholders and provides information regarding State SSBG expenditures and service recipients. The report can be accessed on the SSBG website. Annual reports have been completed each year for the years 1998 – 2021. The 2022 annual report is currently being finalized. The information contained in this report is used to establish how SSBG funding is used for the provision of services in each State. The information collected is the only source of information on the use of SSBG funds by the States. It is also the only source of information on the number of recipients of services funded, in whole or in part, by SSBG.

In addition, the Government Performance and Results Act of 1993 (GPRA) requires all Federal agencies to develop long-term Strategic Plans defining general goals and objectives for their programs; to develop Annual Performance Plans specifying measurable performance goals for all of the program activities in their budgets; and to publish an Annual Performance Report showing actual results compared to each annual performance goal. Toward this end, two performance measures were developed to improve efficiency and accountability within States’ SSBG programs. The first of these measures aims to minimize administrative costs and maximize the amount of funds used for the provision of direct services. The second performance measure analyzes the degree to which States spend SSBG funds in a manner consistent with their intended use as required by the Federal law [42 U.S.C. §1397e (a)]. These performance measures require both pre-expenditure and post-expenditure data.

The Intended Use Plan allows the ACF OCS to identify recipients, methods, and categories for state expenditure of SSBG funds.

3. Use of Improved Information Technology and Burden Reduction

States enter the Pre-Expenditure Report, Intended Use Plan (narrative), and Post-Expenditure Report data on the SSBG Portal. The SSBG Portal is a secure web-based data collection platform that is monitored by Walter R. McDonald and Associates, a contractor. The SSBG Portal allows for efficient data submission without increasing the overall burden on States. It provides a user-friendly means for States to submit and access their Intended Use Plan, Pre-Expenditure data, and Post-Expenditure Report.

4. Efforts to Identify Duplication and Use of Similar Information

The Post-Expenditure Report is the only instrument for collecting data on actual expenditures for, and recipients of, the 29 SSBG-supported service categories. SSBG grant recipients use the Pre Expenditure form to estimate SSBG expenditures at the beginning of the budget period. Grant recipients and SSBG staff use the comparison between the pre and post-expenditure data to analyze and support effective planning and budget reconciliation.

5. Impact on Small Businesses or Other Small Entities

This data collection does not impact small businesses or other small entities.

6. Consequences of Collecting the Information Less Frequently

States are required to submit an annual Post-Expenditure Report on the use of SSBG funds [42 U.S.C. 1397e]. States may also use the Post-Expenditure Report form to provide pre-expenditure data for the required annual Intended Use Plan. This information is critical for understanding the impact of SSBG funding and for assessing States on the two SSBG program performance measures.

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

There are no special circumstances for the Pre-Expenditure information, Intended Use Plan, and Post-Expenditure Report.

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

As required by 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 21, 2023 (88 FR 81088) and provided sixty days for public comment. During the comment period, no comments were received.

9. Explanation of Any Payment or Gift to Respondents

No payment or gift will be provided to respondents.

10. Assurance of Confidentiality Provided to Respondents

No assurance of confidentiality will be provided to respondents. All reported expenditure data are from State public financial records and all recipient data are aggregate counts, not individual case-level data. No personal identifiers will be collected. IRB review is not required for data reporting.

11. Justification for Sensitive Questions

This information collection does not include questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

There are currently 57 respondents, which includes States, the District of Columbia, Commonwealth of Puerto Rico, Massachusetts Commission for the Blind (M-CFB)[1], and the territories American Samoa, Guam, the U.S. Virgin Islands, and the Commonwealth of Northern Mariana Islands. Responses are submitted annually, and burden estimates are based on experience with prior year's submissions.

Information Collection Title	Total # of Respondents	Annual # of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Pre-Expenditure Report Form	57	1	2	114	$64.56	$7,359.84
Intended Use Plan	57	1	40	2,280	$64.56	$147,196.80
Post-Expenditure Reporting Form	57	1	110	6,270	$64.56	$404,791.20
Estimated Annual Burden Total:				**8,664**	**Estimated Annual Cost Total:**	**$559,347.84**

The estimated annual cost is based upon the average hourly salary for social and community service managers, job code 11-9151 based on May 2022 Occupational Employment Statistics from the Bureau of Labor and Statistics[2]. The base wage is equal to the mean salary of $38.13 per hour. The base wage was multiplied by two to calculate wage plus fringe benefits and overhead.

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

[1] M-CFB receives a uniquely funded federal sub-allocation separate from the state of Massachusetts's federal award and is the only SSBG awardee that is not a state or territory.
[2] https://www.bls.gov/oes/current/oes119151.htm

States will not incur any additional costs.

14. Annualized Cost to the Federal Government

The annual cost to the Federal Government is shown in the following table:

AGENCY	Year 1	Year 2	Year 3	Average Annual Cost
Office of Community Services	$41,853	$43,182	$44,511	$43,182
Contractor Staff	$156,123	$168,255	$179,930	$168,103
Total	$197,976	$211,437	$224,441	$211,285

The dollar amounts displayed for the Office of Community Services represent a portion of two Federal staff salaries at a GS-12 level to perform the duties of a social services program specialist.

The dollar amount displayed for the Contractor Staff represents a team from Walter R. McDonald & Associates, Inc. which provides data collection and support annually for the Office of Community Services.

15. Explanation for Program Changes or Adjustments

This request includes modifications to four column titles on the pre-and post-expenditure reports. The proposed changes will clarify for grant recipients what data they should include, which will increase their accuracy in reporting and minimize the need for resubmission to address incorrect data. The changes to the pre and post-expenditure reports does not increase the burden under OMB #0970-0234, but we have adjusted the number of respondents from 56 to 57 to reflect expected respondents over the next three years.

16. Plans for Tabulation and Publication and Project Time Schedule

States' Pre-Expenditure, Intended Use Plan, and Post-Expenditure Reports provide data for the annual report on SSBG expenditures and recipients. The report is shared with grant recipients, federal partners, and stakeholders through the SSBG website. The schedule for the annual report is as follows:

Pre-Expenditure Report/Intended Use Plan:

- An annual Pre-Expenditure Report that describes how the State plans to administer its SSBG funds for the upcoming year must be submitted before receipt of an SSBG allotment. This report must be submitted 30 days before the start of the fiscal year (June 1 if the state operates on a State Fiscal Year, or September 1 if the state operates on a Federal Fiscal Year.

Examples:

- The report or plan covers State Fiscal Year 2024, which runs from July 1, 2024, to June 30, 2025.
- The report or plan covers Federal Fiscal Year 2024, which runs from October 1, 2024, to September 30, 2025.

Post-Expenditure Reporting

- States will submit the Post-Expenditure Report no later than 6 months after the end of their fiscal year. Grant recipients that report on a State Fiscal Year, which will end on June 30, will submit the Post-Expenditure Report by December 30. States that report on the Federal Fiscal Year, which will end on September 30, will submit their Post-Expenditure Reports by March 30 of the following calendar year.
- The OCS contractor develops a draft and submits it to OCS for review in June, 3 months after States reporting on the Federal Fiscal Year submit their Post-Expenditure Reports.
- The second draft will be submitted for clearance within ACF in July.
- The final report will be submitted for review by ACF's Office of Administration in August.
- The annual report will be submitted for publication in September.

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

The expiration date for OMB approval will be displayed.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions to the certification statement are necessary.