

**1. How were the per state burdens estimated? The table in question 12 indicates a burden of 8 hours for the optional submission, 120 hours for the impact assessment, and 160 hours for the corrective action plan. Please provide some breakdown to justify these estimates.**

The per state annual burdens were estimated for each information collection activity as though they applied to all jurisdictions for ease of discussion and public review. The estimates were obtained through TANF consultation meetings with representatives of State and local government; non-profit, advocacy, and community organizations; foundations; and others. There were also consultations that focused on burden estimates with State groups and technical, statistical, and policy experts. Consultations also took place with representatives from the federal statistical community, including the U.S. Bureau of the Census; the Office of Management and Budget; the U.S. Department of Agriculture for the Food Stamp program; and numerous representatives from advocacy, public interest, and research organizations that focus on child economic well-being. Using the feedback from all of the consultations, a burden estimate was decided based on a State (or Territory) obtaining an alternative estimate of child poverty derived from an independent source of eight hours per respondent. The burden estimate for an assessment in relation to the TANF program was figured at 120 hours. This burden estimate is likely to include review and analysis of data, discussion time of any new procedures that will have to be put into place or procedure amendment, and time for external consultation. Also, States (or Territories) would be required to submit a corrective action plan if they have an increase in the child poverty rate of five percent or more. Per consultations and analysis, there was an estimate of 160 annual burden hours for the corrective action plan. This is likely to include researching issues and problem areas as well as time for external consultation and discussions of possible actions and procedures to implement in order to decrease the child poverty rate.

As stated in the submission, these are clearly an overestimate. We do not expect that all States (or Territories) will opt to provide an alternate estimate of child poverty derived from an independent source. We expected at the time of the publication of the final rule that no more than a few States (or Territories) would experience an increase of five percent or more in their child poverty rates and would need to submit an assessment in relation to the TANF program; and only a few States (or Territories) would be required to submit a corrective action plan. In fact, our experience since the implementation of the child poverty rate provision has shown that no State (or Territory) has had an increase in the child poverty rate of five percent or more, and consequently the actual annual burden was zero hours. However, we have not reduced the burden estimate because the potential for a five-percent or more increase in the child poverty rate is still within the realm of possibility. It is this potential increase that would trigger events resulting in a burden to respondents.

**2. What experience has there been with states using alternatives to the Census Bureau estimates of child poverty rates? What other alternatives are states using or have states used in the past, if any? What are the reasons those states have selected the specific alternatives they have chosen?**

At this time, no State (or Territory) has used an alternative to the Census Bureau estimates of child poverty rates.