

THE SUPPORTING STATEMENT FOR INFORMATION COLLECTION APPROVAL OF THE COMMUNITY SERVICES BLOCK GRANT (CSBG) PROGRAM MODEL PLAN APPLICATIONS

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Community Services Block Grant Program Act (42 U.S.C. 9901), as amended requires that as part of the application required for the receipt of Federal funds to administer a CSBG program, each grantee must provide specific information in its state plan. Grantees may use any format they wish to submit the information. However, to assist states and tribes, the Office of Community Services (OCS) provides guidance and distributes model plan application formats each year.

2. Purpose and Use of the Information Collection

The data is reviewed by the Division of State Assistance, Office of Community Services to determine whether grantees have submitted a complete application for Federal funds. An application consists of certification of legislatively required assurances by the Chief Executive or a designate of the Chief Executive and a narrative plan describing how the grantee will carry out the required assurances will be carried out. The plans should include a statement of goals and objectives, information on the specific types of activities to be supported, areas and categories of individuals to be served, and the criteria and method used for the distribution of funds.

3. Use of Improved Information Technology and Burden Reduction

The burden is reduced by allowing applicants to submit required information using the CSBG model plan format. This format helps ensure that all information needed for a complete application is provided by the applicant. The Office of Community Services makes the CSBG Program Model Plan Application available for downloading from the Administration for Children and Families (ACF) web site. We are working with the ACF Office of Information Systems to develop an electronic process for applicants to submit applications. Once this option is available, the electronic version will be the same as the paper and web site versions.

4. Efforts to Identify Duplication and Use of Similar Information

No other Federal agency has the statutory requirement to collect this information. Consequently, there is no similar source of information which can be modified for the purpose of collecting required model plan information for the CSBG program from one year to the next.

5. Impact on Small Businesses or Other Small Entities

No small businesses or other small entities will be involved. Only states, territories, tribes and tribal organizations are affected.

6. Consequences of Collecting the Information Less Frequently

The information collection is an activity which is required by law for the receipt of Federal CSBG funds. The model plan encompasses the content of information statutorily required for a complete plan. Collecting this information also enables ACF to more effectively monitor and keep track of grantee changes. In addition, it provides grantees an optional management tool that may alleviate the burden of preparing additional materials. Without this information collection, ACF would not be able to issue CSBG grants. There are no legal obstacles to reduce the burden.

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

There is no circumstance that requires the information to be provided or the model plan format to be used in a manner inconsistent with the guidelines of 5 CFR 1320.5.

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

A notice in the Federal Register was posted on October 26, 2009 (Volume 74, Number 205, Page 55051). In this notice, ACF solicited public comment on the proposed collection. Public comment was to be received within 60 days of the publication date of the notice. ACF received no public comments.

ACF consulted with the National Association for State Community Services Programs whose members are state managers of the CSBG program. In addition, ACF program staff discussed the CSBG model plan application with State and Tribal officials.

9. Explanation of Any Payment or Gift to Respondents

Not applicable—no payment or gift will be provided to respondents.

10. Assurance of Confidentiality Provided to Respondents

The information collection does not require an assurance of confidentiality.

11. Justification for Sensitive Questions

This information collection does not involve asking questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

There will be approximately 86 respondents (56 states and territories and 30 tribes and tribal organizations). We estimate it will take each respondent 10 hours to complete the model plan. This includes time for reviewing previous application plans, gathering data needed and reviewing the completed application.

12A. Estimated Annualized Burden Hours

Type of Respondent	Form Name	No. of Respondents	No. Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
States and Territories	CSBG Program Model Plan Application	56	1	10	560
Tribes and Tribal Governments	CSBG Program Model Plan Application	30	1	10	300
Total					860

12B. Estimated Annualized Burden Costs

Type of Respondent	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
States and Territories	56	\$26.92	\$1507.52
Tribes and Tribal Governments	30	\$26.92	\$807.60
Total			\$23,151

The respondents are CSBG program managers. The CSBG managers plan, organize, and/or coordinate CSBG activities for their employer. Their duties generally fall under the Social and Community Service Managers Occupation Employment category established by the Bureau of Labor Statistics. For 2008, the most current information available, the Bureau of Labor Statistics indicates that \$26.92 is the median hourly wage for Social and Community Service Managers. Using this median hourly wage, the estimated annualized burden costs is \$23,151.12 (860 [Total burden hours] x 26.92 [median hourly wage]).

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

There are no additional annual direct costs to respondents as a result of this information collection.

14. Annualized Cost to the Federal Government

Based on our experience in administering the CSBG program, we estimate that it takes an average total of 4 hours for Federal staff to review each model plan application and make any necessary follow-up contacts with grantees to obtain additional information.

A GS 12 or 13 employee generally reviews each report and a GS 14 or 15 employee generally makes final decisions when there are questions about the adequacy of information. At an average salary rate of \$48.00 per hour, assuming 4 hours each for 86 applications, the Federal salary costs each year will be approximately \$16,512 (4 hours x \$48.00 x 86 applications).

The OCS estimates an additional annual \$200.00 to cover the cost of making the model plan application Information Memorandum available electronically and by hard copy when necessary.

15. Explanation for Program Changes or Adjustments

This request is for OMB approval of an existing data collection in use without an OMB number.

16. Plans for Tabulation and Publication and Project Time Schedule

The results of the information collection and Model Plan applications will not be published.

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

Not applicable

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions necessary for this information collection.

B. Statistical Methods (used for collection of information employing statistical methods)

Not applicable.

1. Respondent Universe and Sampling Methods
2. Procedures for the Collection of Information
3. Methods to Maximize Response Rates and Deal with Nonresponse
4. Test of Procedures or Methods to be Undertaken
5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data