

**Supporting Justification for OMB Clearance of  
Strengthening Communities Fund Program Evaluation**

**REQUEST FOR CLEARANCE**

Part A: Justification for the Collection of Baseline Data

August 2010

The Administration for Children & Families (ACF) of the U.S. Department of Health and Human Services (HHS) is conducting the Strengthening Communities Fund (SCF) Program Evaluation, a new initiative funded under the American Recovery and Reinvestment Act (ARRA) of 2009 to enable nonprofit organizations to contribute to the economic recovery and help federal, state, and local governments ensure that the information and services described in the Recovery Act reach disadvantaged and hard-to-serve populations. On April 21, 2010, ACF was granted Emergency Clearance for this data collection through October 31<sup>st</sup>. We now seek OMB regular clearance approval for these program-specific grantee data collection tools.

### **A1. Circumstances Making the Collection of Information Necessary**

Given this Administration's commitment to transparency and accountability, it is essential that ACF be able to continue to collect grantee data to inform the public of the impact of this Recovery Act program. It would create public harm if this program were not captured and quantified through output and outcome measures as are required for the purposes of Administrative Code 2 CFR 215 and the public website Recovery.gov. Failing to collect SCF performance and progress data would prevent the Administration, the Congress, and the public from obtaining any meaningful information about the SCF program. Additionally, without the requested data collection, it will not be possible to complete proper analysis and assessment of the SCF program to determine its benefits to the public and guide future policy decisions.

### **Legal or Administrative Requirements that Necessitate the Collection**

The Strengthening Communities Fund initiative was authorized under the American Recovery and Reinvestment Act of 2009 (ARRA), ACF, Children Families Services Programs, (4) as follows: "(4) \$50,000,000 for carrying out activities under section 1110 of the Social Security Act." The purpose of the SCF initiative is to enable nonprofit organizations, through capacity building, to contribute to the economic recovery, and to help state, local and Tribal governments ensure that the information and services described in the Recovery Act effectively reach disadvantaged and hard to serve populations. To accomplish the objective of the appropriations, ACF seeks OMB approval of a program specific data collection tool to collect grantee information regarding the impact of the program.

### **A2. Purpose and Use of the Information Collection**

If this request is approved, the Program Performance Reports (PPR) for the two sets of SCF program grantees, Nonprofit and Government grantees,

would continue to be collected through the life of the program, with the program ending by September 30, 2011. Additionally, SCF grantees are eligible for no-cost extensions under the HHS Grants Policy statement. Therefore SCF grantees may conceivably operate through September 30, 2012 with final reports required by December 31, 2012.

The Nonprofit grantee data to be collected includes an organization profile for each grantee and subrecipient, as well as project information including descriptions of social service programs benefiting from services provided through SCF. The PPR collects primary recipient data for baseline, target and actual-to-date progress for defined output measures including hours of technical assistance provided, hours of training provided, amount of financial assistance provided, and the number of organizations assisted. In addition, the instrument captures important subrecipient project milestones including individual plans and outcome measures.

The SCF Government grantee data to be collected includes social service priority areas, project objectives and goals, project description, and associated indicators for capacity building efforts. The SCF Government Capacity Building program differs from its nonprofit counterpart in that it prohibits award of funds to subrecipients, and it allows the governmental grantee the discretion to use SCF funds to build its own capacity to collaborate with nonprofit social service providers in its jurisdiction. The proposed tool collects base line, target and actual progress-to-date for capacity-building services provided, including the number of organizations targeted with outreach and information, as well as the number of organizations receiving training and technical assistance, the respective hours of each service provided, grant management activity and technology deployed. The proposed tool also provides for the reporting of organizations benefiting from the government grantee through description of persons served, service expansion, success rates, and interagency collaborations.

The data will serve several purposes. Information related to the impact of the program will help ACF to evaluate the effectiveness of this initiative and provide the necessary tools to allow for accountability of the Recovery Act funds. This information will also allow the Administration to publicly communicate the impact and achievements of the program, and make future policy decisions on the basis of such knowledge. Data will also be used to verify progress toward goals identified in approved grantee proposals and work plans. The proposed instruments provide information needed for monitoring and assessing grantee performance, and allow for prompt action when needed to ensure satisfactory achievement of the goals and objectives set out in SCF program announcements.

### **A3. Use of Improved Information Technology and Burden Reduction**

The data collection plan reflects sensitivity to issues of efficiency, accuracy, and respondent burden. ACF implemented electronic collection for the 3<sup>rd</sup> Quarter FY 2010 data collection. Full implementation of electronic collection (with the added enhancement of an import function) is expected to be complete for the 4<sup>th</sup> Quarter FY 2010 data collection. The electronic submission platform will facilitate ease of reporting, internal data review and monitoring, and reduce the burden on grantees.

#### **A4. Efforts to Identify Duplication and Use of Similar Information**

There is no similar information since the SCF program is a new initiative funded under the Recovery Act of 2009.

#### **A5. Impact on Small Businesses or Other Small Entities**

Of the 84 total grantees under the SCF program, 35 are considered nonprofit grantees and 49 are government organizations, which may be state, local, or tribal. The data collection plan is designed to minimize burden on those grantees that may be considered smaller organizations through the use of an electronic platform for data responses. ACF staff convened a grantee conference in late January of 2010 to orient grantees to the data reporting expectations and engage the grantees in a dialogue about these reporting expectations prior to finalizing the included data collection tool, to accommodate grantee feedback. In addition to ongoing programmatic technical assistance provided through newsletters, webinars, and a resources webpage, the program office and resource center jointly provide training and assistance related to reporting requirements as needed for each reporting cycle.

#### **A6. Consequences of Collecting Information Less Frequently**

The SCF program is a time-limited initiative as funded under the Recovery Act of 2009. Therefore timely approval of the data collection tool is essential to allow ACF to gather necessary information from grantees for accountability and communication purposes, before the program's authorization expires at the end of FY 2010.

#### **A7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

There are no special circumstances for the proposed data collection.

#### **A8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency**

The 60 Day notice was published in the Federal Register on March 29, 2010, vol 75, page 15438.

At the end of January 2010, ACF hosted a conference for all SCF grantees to orient them to the data reporting and collection expectations. In addition to providing grantees with technical assistance, this conference also allowed for a dialogue to discuss the data reporting expectations prior to the finalizing of the proposed data collection tool. ACF is continuing to provide ongoing programmatic technical assistance through newsletters, webinars, and a resources webpage. The program office and resource center also jointly provide training and assistance related to reporting requirements as needed for each reporting cycle.

**A9. Explanation of Any Payment or Gift to Respondents**

No payment or gift will be made to respondents during data collection.

**A10. Assurance of Confidentiality Provided to Respondents**

The privacy of respondents will be protected to the fullest extent of the law.

**A11. Justification for Sensitive Questions**

There are no sensitive questions planned for this data collection.

**A12. Estimates of Annualized Burden Hours and Costs**

The Program Performance Report (PPR) information collection does not impose a financial burden on SCF grantee respondents. Respondents will not incur any burden other than the time spent answering the questions contained in the questionnaires.

Exhibit A12.1 summarizes the reporting burden on study participants. Questionnaire response times were estimated based on similar PPR reports administered by other similar ACF programs. The annual burden for questionnaire response is estimated from the quarterly report requirement and the time required to complete the questionnaires. The total annual burden is expected to be 336 hours.

To compute the total estimated annual cost, total burden hours were multiplied by the average hourly wage for each adult participant, based on median weekly wages from the current Bureau of Labor Statistics, Current Population Survey estimates (first quarter of 2009 provided for full-time employees over the age of 25). For most grantees, the respondent will be a member of a nonprofit organization or government entity. For these respondents, we used the median salary for individuals with a bachelor's degree (\$25.60 per hour) as the most common minimum education level of a diverse group (to include program directors, community agency leaders, and local evaluators and research assistants).

Exhibit A12.1. Reporting Burden on Study Participants

Instrument	Annual Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Annual Burden Hours	Average Hourly Wage of Respondents	Total Annual Burden Cost
Nonprofit Capacity Building Program Performance Progress Report (PPR)	35	4	1	140	\$25.60	\$3,584.00
Government Capacity Building Program PPR	49	4	1	196	\$25.60	\$5,017.60
Total				336		\$8,601.60

### **A13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers**

These information collection activities do not place any additional cost on respondents.

### **A14. Annualized Cost to the Federal Government**

Costs for the proposed data collection including instrument development, collection, and analysis and report preparation are estimated at \$110,543 annually.

### **A15. Explanation for Program Changes or Adjustments**

This is the continuation of an existing collection, as initial approval was initially done under Emergency Clearance procedures. The purpose of this request is to obtain regular clearance for approved data collection through the life of the program, as authorization for the current OMB clearance expires October 31, 2010. Therefore no program adjustments are anticipated based on this data collection.

Three minor technical corrections were made to the data collection instruments. First, all references to “semi annual reports” were replaced with “quarterly reports,” as per ARRA reporting requirements. Second, on page two, under the section “Other Attachments,” the cross reference for additional information was corrected to be “Budget Progress Attachment” (rather than previously stated “Training and Technical Assistance Attachment”). Third, under Section B instructions, the first sentence was corrected to specify “through the end of the reporting period” (rather than previously stated “through the project.”

Finally, the cover transmission pages have been updated to reflect the web-based version of the data collection tool, replacing the previous paper and pen cover pages.

#### **A16. Plans for Tabulation and Publication and Project Time Schedule**

The SCF program evaluation will be conducted over the life of the SCF initiative, whose authorization expires at the end of FY 2010. The first full data collection took place for the second quarter of FY 2010 under Emergency Clearance approval. We now seek regular clearance approval to continue data collection through the life of the SCF program. ACF expects that SCF grantees will complete project activities by September 30, 2011, with final reporting by December 30, 2011. Under the HHS Grants Policy statement, SCF grantees may request a no-cost extension. Conceivably such an extension may allow SCF grantees to operate through September 30, 2012 with final reporting due by December 31, 2012.

ACF expects to publish the results of this data collection as required under the reporting guidance related to the Recovery Act, including, but not limited to, the publicly accessible website Recovery.gov. Updated information on the SCF program and related performance measures was updated in Spring 2010 and posted on Recovery.gov as part of the larger body of HHS Recovery Act Implementation Plans in June of 2010 (located at: <http://www.recovery.gov/Transparency/agency/Recovery%20Plans/HHS%20Recovery%20Act%20Plan%20-%20June%202010.pdf>). This information will also be used for internal monitoring and reporting requirements.

#### **A17. Reason(S) Display of OMB Expiration Date is Inappropriate**

All instruments display the OMB number and the expiration date as set by Emergency Clearance approval (October 31, 2010).

#### **A18. Exceptions to Certification for Paperwork Reduction Act Submissions**

No exceptions are necessary for this information collection.