

**The Supporting Statement for the Information Collection Approval  
of the Community Services Block Grant (CSBG) Model Plan Application for States  
May 13, 2015**

**A. Justification**

**1. Circumstances Making the Collection of Information Necessary**

The Community Services Block Grant (CSBG) Act (42 U.S.C. 9901, *et seq.*) was established under the Community Opportunities, Accountability, and Training and Educational Services Act of 1998, Public Law 105-285. The Office of Community Services (OCS), Administration for Children and Families (ACF), U.S. Department of Health and Human Services administers CSBG at the Federal level. CSBG provides funds to States and other entities to support services and activities that alleviate the causes and conditions of poverty in communities.

Section 676(b) of the CSBG Act, as amended, requires States to submit an application and plan in order “to be eligible to receive a grant or allotment” under the CSBG Act. The statute provides that “a State shall prepare and submit to the Secretary an application and State plan covering a period of not less than 1 fiscal year and not more than 2 fiscal years.” Further the statute states that “the plan...shall contain such information as the Secretary shall require, including” a list of 13 specific items or assurances (see attachment A for the full text of Section 676(b) of the CSBG Act).

Over the last several years, OCS and the CSBG Network – composed of CSBG eligible entities, State CSBG Lead Agencies, State Community Action associations, national partners, and others – have collaborated to create a new performance management and accountability framework for CSBG. This framework includes 1) organizational standards for local CSBG entities, 2) accountability measures for States and OCS, and 3) CSBG outcome measures (National Performance Indicators). These elements are designed to increase accountability across all three levels of the network (Federal, State and local) and enable us to make better program decisions based on data. Ultimately, this framework will help OCS and the CSBG Network to generate stronger results for the low-income people and communities we serve.

In light of the performance management and accountability effort, OCS has revised and automated the previously approved CSBG State Plan to make it easier to submit and more effective as a planning, performance management, and accountability tool.

The proposed revisions to the CSBG State Plan include:

1. *Streamlining*: OCS has retained all the elements of the previous State plan, as required by the CSBG Act, but has simplified, clarified, and streamlined the content.
2. *Automation*: OCS has created an online version of the CSBG State Plan. States will submit their plan through the ACF Online Data Collection (OLDC) system; the same system States use to submit their annual online application form (the SF-424 Mandatory). A streamlined and automated plan will be much easier to use.

3. *Performance Management Integration*: OCS has revised the State plan to collect critical performance management information on local entity organizational standards and State accountability measures. In January, OCS published two important Information Memoranda (IMs): 1) [IM 138, State Establishment of Organizational Standards for CSBG Eligible Entities](#) and 2) [draft IM, State and Federal Accountability Measures and Data Collection Modernization](#). These IMs describe the central role of the CSBG State Plan in implementing these performance management efforts.

We are requesting authorization for the revised CSBG State Plan to serve as the required State plan for all States and territories to use to apply for CSBG funding.

**Tribal CSBG**: Indian tribes and tribal organizations are also eligible to apply directly for CSBG funding. In the past, OCS has sought information collection approval for State and tribal plans in the same PRA request. We plan to seek renewal of the information collection for tribes and tribal organizations separately. Until then, tribes and tribal organizations will continue to submit tribal plans under the current OMB-approved model tribal plan.

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

The data in the CSBG State Plan is developed and submitted by States and territories and reviewed by the Division of State Assistance in OCS to determine whether grantees have submitted a complete application to qualify for Federal funds and are in compliance with the CSBG Act. The revised and automated State plan will streamline both the State development and the Federal review of the information. In addition, with the revised plan, State and Federal staff will interact with and use the data to improve performance and track results from year to year.

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

By using technology to create an automated, web-based form for this information collection, OCS will dramatically reduce burden for State and Federal staff, while creating new efficiencies and capabilities for program planning, oversight, and accountability. In the past, States followed a model State plan outline to create a free form, narrative State plan. With the new State plan, States will have the option to select pre-formatted responses with check-boxes, for example, and to pre-populate data from other sections of the plan or even a previous year's plan.

In addition, States will submit the revised CSBG State plan through the ACF On-Line Data Collection (OLDC) system, which is the central, web-based reporting tool that OCS uses for other programs and eventually intends to use for all CSBG forms, including a CSBG Annual Report. OLDC will enable Federal and State staff to access data easily and

track the submission, review, and acceptance of the plans. Overall, OLDC will increase the transparency and accountability of the submission and review process.

While States may spend additional time in the first year of using the new plan learning the new system and inputting data, this burden will drop substantially in subsequent years due to automation.

#### **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 that can be modified for the purpose of collecting required CSBG State Plan information.

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

No small businesses or other small entities are involved in this information collection. Only States and territories are affected.

#### **6. Consequences of Collecting the Information Less Frequently**

The information collection is required by law in order for States to receive Federal CSBG funds (please see item 1 above). OCS would not be able to provide CSBG funding to State grantees without this collection. States have the option to submit their State plan annually or biannually.

#### **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 State 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**

In a notice in the *Federal Register* posted on January 26, 2015 (Volume 80, Number 16, Page 3967), ACF solicited public comment on the proposed collection. Public comments were due by March 27.

In response to the 60-day notice, OCS received 21 sets of comments from organizations across the CSBG Network, including national organizations, State CSBG agencies, State Community Action associations, and local agencies. In addition, OCS received dozens of informal questions and comments during four webinars. During this time, OCS also got feedback on the proposed CSBG State and Federal Accountability Measures that are integrated in the State plan.

OCS organized all the comments and carefully considered each one. During this review process, OCS convened four national CSBG partners to discuss the major areas of concern and allow the partners' further input into the issues. As a result, the revised version of the State plan submitted in this PRA package reflects the collaborative thinking of the CSBG Network as well as the needs of the Federal government in administering CSBG. (Please see Attachment B to see each comment and OCS's response. In addition, see Attachments C and D for the revised CSBG State plan and CSBG State Accountability Measures.)

The major concerns raised by the commenters and the OCS response to each are described below:

- A. State Plan item 3.2: Statewide vision and goals:** Several commenters were concerned that the requirement for States to describe a statewide vision and goals in State Plan item 3.2 and accountability measure 1Sa(i) infringes on the authority of the eligible entities to develop their local visions and goals. Other commenters were concerned that the question required States to "roll up" all the visions and goals from each of the eligible entities' local plans into the State plan, which would be onerous and impractical. In response, OCS has revised item 3.2 by using the terms "goals and strategies" rather than "vision and goals," clarifying that the statewide goals and strategies refer to State administration of CSBG and not to anti-poverty goals and strategies determined locally. We also provide examples goals and strategies in the accountability measures document.
- B. State Plan item 10.5: State reporting on CSBG eligible entity serious deficiencies:** Many commenters expressed concern about the requirement under item 10.5 to report eligible entities with serious deficiencies by name and indicated that the State plan was not the right mechanism for collecting this type of information. In addition, commenters asked for clarification of items 10.5 and 10.6, especially a definition for the term "serious deficiency." In response, OCS has removed the term "serious deficiency" from the State plan and from the associated Accountability Measure 4Sa(iii), and revised item 10.5 to ask for the number of entities on Quality Improvement Plans, rather than the list of entities by name. OCS expects to seek OMB clearance to collect eligible entity-specific corrective action status in the CSBG Annual Report or another type of report rather than in the State plan, an approach suggested by commenters.
- C. State Plan section 14: CSBG assurances:** In the proposed State plan, OCS had designed section 14 to be a plain language version of the assurances listed in Section 676(b) of the CSBG Act. However, several commenters indicated that the wording of many of the questions in section 14 was confusing. In particular, items 14.1 a-c, 14.4, and 14.6, required states to "roll up" information from local eligible entity plans, which is beyond the scope of section 676(b) of the CSBG Act, and is technically burdensome. Commenters also suggested that content of several of the assurances

could be included in section 9, Linkages and Communication. In response, OCS has revised section 14 substantially, particularly by quoting the statutory language for each of the assurances, rather than using plain language versions. In addition, we have created new questions in section 9 that correspond to several items from the assurance section.

- D. **State Plan item 7.5: Timeframe for State distribution of funds:** Several commenters were concerned that the questions in section 7, and corresponding accountability measure 2Sa, on distribution of funds to the eligible entities, did not account for the variety of State distribution practices, and could unintentionally penalize States that have effective procedures. Commenters were confused about what part of the State distribution process was included in the 30 day distribution timeframe in the measure, and some suggested that the time frame should include the full State process rather than just part. In response, we have revised the questions and accountability measure to indicate the time frame encompasses the entire State process (starting from after distributing the Federal award). While we are retaining the 30 day target in the measure to encourage timeliness and accountability, we have also added a question to allow any State that cannot make that timeframe to explain its procedures to ensure funds are made available to eligible entities consistently and without interruption.
- E. **Paperwork Reduction Act estimated burden:** Several commenters indicated that the proposed estimated, average, annual burden of 10 hours per State significantly underestimated the amount of time it would take for a State to prepare and submit a CSBG State plan, particularly considering the training required in the first year to learn the new automated system. In response, we are revising the burden estimate to include a more robust accounting of the burden of the planning that goes into the State plan, as well as the added change management effort and training required to learn the new system in the first year. Please see item 12 below for information on the revised burden calculation.
- F. **Annual assessment of CSBG eligible entities on organizational standards:** Several commenters were concerned with the administrative burden and cost associated with the requirement to "monitor" or assess eligible entities against the new CSBG organizational standards every year, as reflected in section 6 of the State plan and associated accountability measure 6S. In response, while OCS is well aware of these concerns and is addressing them in a variety of ways, the requirement for States to assess organizational standards annually is outside the scope of the State plan under consideration in this PRA clearance package and is not included in the burden calculation. [Note: OCS's position is that assessing the eligible entities against organizational standards each year is a critical performance management tool. In addition, OCS has the authority to impose this requirement (see IM 138). OCS efforts to support States in implementing the organizational standards include funding a multi-year, extensive training and technical assistance effort and allowing maximum flexibility in how States choose to assess standards, as described in IM 138.]

- G. **Quality Improvement Plans and Technical Assistance Plans:** Related to item F above about assessment of organizational standards, many commenters asked for clarification of the terms Quality Improvement Plans (QIPs) and Technical Assistance Plans (TAPs) as they relate to the corrective action activities and as they are used in sections 6, 8, and 10 of the revised State plan, and in accountability measure 6Sb. In response, OCS revised several items in section 8 and the accountability measure to reduce confusion.
- H. **FYs 2015-2016 State plan:** We received numerous questions regarding what data OCS would require the 13 States that are currently in the middle of a two-year State plan performance period to submit for FY 2016. In response, OCS is working with these States to develop a simple, one-time strategy. All CSBG State grantees, including these 13 States, must submit some basic information about organizational standards and State accountability measures in FY 2016 in order to implement the CSBG performance management framework across all CSBG grantees at the same time. However, OCS is working with the OCS systems developers and the 13 States to provide a solution that is as simple as possible for FY 2016.

**Broad CSBG Network Support:** Commenters across the CSBG Network submitted comments through the PRA system and on webinars in support of OCS's effort to automate, streamline, and integrate performance management elements in the CSBG State Plan and complimented OCS efforts to reach out to the CSBG Network for feedback.

## 9. Explanation of Any Payment or Gift to Respondents

The information collection does not involve any payment or gift 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 include sensitive questions.

## 12. Estimates of Annualized Burden Hours and Costs

We have increased the burden estimate based on comments in response to the 60-day *Federal Register* notice. In the first *Federal Register* notice published on January 26, we had estimated a total for 560 burden hours, which reflected an average of 10 hours per State plan across the 56 States and Territories. Based on comments in response to this burden estimate (see item 8E above), we have substantially revised this estimate upwards for a total of 33 burden hours.

We estimate it will take each respondent 40 hours to complete the model plan in the first year. This includes time training on the new State plan and online system, developing new performance management elements, entering data into the automated State plan for the first time, and reviewing the completed plan. In subsequent years, we estimate it will take each respondent approximately 29 hours to complete the State plan, due to greater familiarity with the new system and the efficiencies of having State plan data from the prior submission already in the OLDC system. The total revised burden estimate, therefore, is the average of these three years, which is 33 hours for each of the 56 respondent, a total of 1848 burden hours.

The respondents are CSBG program managers in each State. 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 2012, the most current information available, the Bureau of Labor Statistics indicates that \$28.83 is the median hourly wage for Social and Community Service Managers.<sup>1</sup> Using this median hourly wage, the estimated annualized burden costs is \$53,277.84 (1848 [Total burden hours] x 28.83 [median hourly wage]).

**12A. Estimated Annualized Burden Hours**

<b>Type of Respondent</b>	<b>Form Name</b>	<b>No. of Respondents</b>	<b>No. Responses per Respondent</b>	<b>Average Burden per Response (in hours)</b>	<b>Total Burden Hours</b>
States and Territories	CSBG Program Model Plan Application	56	1	33	1848

**12B. Estimated Annualized Burden Costs**

<b>Type of Respondent</b>	<b>Total Burden Hours</b>	<b>Hourly Wage Rate</b>	<b>Total Respondent Costs</b>
States and Territories	1848	\$28.83	\$53,277.84

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

<sup>1</sup> Bureau of Labor Statistics, U.S. Department of Labor, *Occupational Outlook Handbook, 2014-15 Edition*, Social and Community Service Managers, on the Internet at <http://www.bls.gov/ooh/management/social-and-community-service-managers.htm> (visited March 11, 2015).

This information collection does not involve additional annual direct costs to respondents (beyond the burden described under item 12).

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

In the past, when States submitted a non-automated CSBG State plan (i.e., hard copy), it took Federal staff an estimated average of 4 hours to review a plan, including the time spent following-up with grantees to obtain missing information and discussing questions with supervisors. The new automated, streamlined State plan will cut this initial review time to one hour per plan, due in large part to automated features that will prevent States from submitting incomplete plans.

In addition, with the inclusion of performance management information in the revised CSBG State Plan, Federal staff will now be able to review the performance and accountability elements in each State plan and provide targeted, performance-boosting feedback to States. We expect Federal staff to spend an average of 5 hours per State plan reviewing performance and accountability elements in the plan and providing feedback to States. This three-year average takes into account additional time for Federal staff to train and learn the new system in the first year.

Typically a Federal General Schedule 12 or 13 employee at OCS in Washington, DC reviews each State plan and will refer questions to supervisors at the GS 14 or 15 level, as needed. At an approximate average salary rate of \$48.00 per hour, Federal salary costs each year will be approximately \$13,440 (1 hour x \$48.00 x 5 hours x 56 applications).

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

The program changes driving the revision of the CSBG OMB-approved information collection include the need for greater efficiency and accountability among government agencies and State grantees, and are described under item 1 of this supporting statement.

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

OCS will not publish the individual State plans collected under this information collection. OCS is exploring options for making State plan information publically available online, and may propose this in a future PRA information collection request.

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

OCS will clearly display the OMB approval number, expiration date, and other required information on this information collection.

#### **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