

**The Supporting Statement for the Information Collection Approval  
of the Community Services Block Grant (CSBG) Annual Report  
October 24, 2016**

**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 (HHS) 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.

Under Section 678E(a)(1)(A) of the CSBG Act, States that receive CSBG are required to participate in a performance measurement system and must ensure that all eligible entities in the State participate in a performance measurement system. The Act specified that this may be a performance measurement system for which the OCS facilitated development or an alternative system that the Secretary is satisfied meets the requirements of Section 678E(b), which outlines accountability and reporting requirements, including the establishment of a performance measurement system through which States and eligible entities measure their performance in achieving the goals of their community action plans.

Section 678E(a)(2) of the CSBG Act, as amended, requires that each State shall annually prepare and submit to the Secretary a report on the measured performance of the State and the eligible entities in the State. Each State is required to include in the report an accounting of the expenditure of funds received by the State through the CSBG, including an accounting of funds spent on administrative costs by the State and the eligible entities, and funds spent by eligible entities on the direct delivery of local services. In addition, each State is required to include information on the number of and characteristics of clients served in the State based on data collected from the eligible entities. Each State is also required to include in the report a summary describing the training and technical assistance offered by the State to correct deficiencies noted during the year covered by the report.

To help meet these requirements and to strengthen overall program management, OCS and the CSBG Network – composed of CSBG eligible entities, State CSBG Lead Agencies, State Community Action associations, national partners, and others – have collaborated in a multi-year effort to update the system of performance management, accountability, and reporting for CSBG. This updated and improved performance management framework includes 1) organizational standards for local CSBG eligible entities, 2) accountability measures for States and OCS, and 3) Results Oriented Management and Accountability (ROMA) Next Generation which includes an updated and refined set of CSBG outcome measures. These elements are designed to increase accountability across all three levels of the network (Federal, State and local) and to enable program administrators at all levels to make better program decisions based on data. Ultimately, it is expected that this framework will help OCS and the CSBG

Network to generate stronger results for people with low-incomes and communities served by the national network of States and eligible entities.

In light of the performance management and accountability effort, OCS has already revised and automated the previously approved CSBG State Plan to make it easier to submit and to be more effective as a planning, performance management, and accountability tool. In August of 2015, OCS received approval from the OMB for the CSBG State Plan (OMB No. 0970-0382). In addition, OCS successfully implemented a new electronic State CSBG Plan submission process using the ACF Online Data Collection (OLDC) system, which is the same system States use to submit their annual online application form (the SF-424 Mandatory) for CSBG and other Federal programs. This process retained all of the reporting elements of the previous State Plan, as required by the CSBG Act, but simplified, clarified, and streamlined the instructions and the procedures for submission.

In the CSBG State Plan approved by OMB August 2015, OCS incorporated new questions to collect critical performance management information on local entity organizational standards and State accountability measures. Recent instructions for State CSBG Plan submission are included in [CSBG IM #147 Application for FY 2017 Funds for States and Territories](#). To support this effort, OCS published two important Information Memoranda (IMs): 1) [IM #138, State Establishment of Organizational Standards for CSBG Eligible Entities](#) and 2) [IM #144, State and Federal Accountability Measures and Data Collection Modernization](#). In addition to describing the role of the CSBG State Plan in a new performance management framework, these IMs also outlined plans to link information provided in the State Plans with information that would be required in an updated CSBG Annual Report using OLDC.

As the next step in the full implementation of the new performance management framework and reporting system, OCS is now requesting OMB approval for data collection for the CSBG Annual Report. This new Annual Report will replace the CSBG Information Survey (CSBG-IS), which is an ACCESS database system developed as a technical assistance tool for States and administered by an OCS grantee to help States provide necessary information for an Annual Report. OCS plans to phase-out the use of the CSBG-IS and replace with the OLDC system and will include the following four modules:

- **Module 1: State Administration** (completed by State CSBG Administrators) includes information on State administration of CSBG funding, including information on distribution of funds to eligible entities, use of State administrative funds and discretionary funds for training and technical assistance, as well as information on eligible entity organizational standards progress, and the State's progress meeting accountability measures related to State monitoring, training and technical assistance and other critical areas.

- **Module 2: Agency Expenditures, Capacity, and Resources** (completed by eligible entities; reviewed, evaluated, and analyzed by State CSBG Lead Agencies) includes information on funds spent by eligible entities on the direct delivery of local services and strategies and capacity development as well as information on funding devoted to administrative costs by the eligible entities.
- **Module 3: Community Level** (completed by eligible entities; reviewed, evaluated, and analyzed by State CSBG Lead Agencies) includes information on the implementation and results achieved for community-level strategies.
- **Module 4: Individual and Family Level** (completed by eligible entities; reviewed, evaluated; analyzed by State CSBG Lead Agencies) includes information on services provided to individuals and families, demographic characteristics of people served by eligible entities, and the results of these services.

The new CSBG Annual Report will be implemented in two phases.

In Phase 1, States will complete the Administrative Module for the FY 2016 and FY 2017 Annual Reports while continuing to provide information on individual, family, and community indicators through the existing CSBG-IS process. The expected submission date for the FY 2016 Annual Report will be March 31, 2017. The expected submission date for the FY 2017 Annual Report will be March 31, 2018. This administrative module builds directly upon the information provided in the FY 2016 State CSBG Plan and the information required for completion of this section will be available in State records and information systems. States will use the ACF OLDC system to submit the information and information will be auto-populated from the corresponding CSBG State Plan to reduce State burden.

In Phase 2, States will submit a complete CSBG Annual Report (Modules 1-4) for the FY 2018 Annual Report, with an expected submission date of March 31, 2019. States will use the ACF OLDC system to submit the information and where appropriate information will be auto-populated from the corresponding CSBG State Plan to reduce State burden. Completion of these sections will require adaptation of information collection at the eligible entity level, and therefore, OCS plans to provide additional time for these activities.

## 2. Purpose and Use of the Information Collection

As outlined above, the CSBG Annual Report has been designed to support a multi-level performance management framework. The information in the new CSBG Annual Report will be used at the local, State, and national levels to improve performance and track

results from year to year and to assure accountability for critical activities and outcomes at each level of the CSBG network. ACF will be encouraging the use of principals outlined in the Government Performance and Results (GPRA) and Modernization Act to use the data collected in the CSBG Annual Report for improvement to achieve breakthrough results for people with low-incomes and the communities in which they live.

At the local eligible entity level, the information in the Annual Report will support agency efforts to set and measure progress on targets for individual, family, and community outcomes resulting from locally-determined services and strategies to address locally-identified community needs.

At the State level, the Annual Report will support oversight and technical assistance and promote accountability for critical state functions such as State Plan development, monitoring, grant administration, training and technical assistance, and state-level communications and linkages.

At the Federal level, receipt and review of CSBG Annual Reports will permit necessary oversight and accountability for CSBG grant funds and provide necessary information for the Secretary's Accountability and Performance Requirements as outlined in Section 678E(b) of the CSBG Act.

Combined with information from the CSBG State Plan and other information from Federal monitoring and oversight, the Annual Reports from States will provide necessary information to report to Congress as required under Section 678E(b)(2) regarding:

- the planned use of funds by each State, and the eligible entities in the State, as contained in each State Plan;
- how funds were actually spent by the State and eligible entities in the State, including a breakdown of funds spent on administrative costs and on the direct delivery of local services by eligible entities;
- information on the number of entities eligible for CSBG funds, the number of low-income persons served, and necessary demographic data on the low-income populations served by eligible entities as is determined by the Secretary to be feasible;
- a comparison of the planned uses of funds for each State and the actual uses of the funds;
- a summary of each State's performance results, and the results for the eligible entities,
- other information necessary for grant administration, accountability, and transparency purposes consistent with the CSBG performance management framework, and

- the use of CSBG fund to provide training and technical assistance to eligible entities.

OCS plans to use information from the Annual Report to analyze State progress on implementing elements of the performance management framework, including eligible entity organizational standards, and State accountability measures.

In addition to using the information contained in the Annual Report for required monitoring and reporting purposes, OCS plans to use information from the Annual Reports to promote improved coordination of technical assistance at regional and national levels. For example, information will be used to identify priority areas for training, technical assistance, monitoring, and evaluation that can be supported through reserved Federal funds as required under Section 674(b)(2) of the CSBG Act and outlined in sections 678A through 678F of the Act.

### **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 create new efficiencies and capabilities for program planning, oversight, and accountability. In the past, States met annual reporting requirements using the CSBG-IS, which is a database system provided as a technical assistance tool and operated by an OCS grantee. While the new OLDC system will include many similar data elements to the CSBG-IS, the new approach will allow OCS to link information from the CSBG State Plans directly to the administrative module of the Annual Report. States will have the option to select pre-formatted responses with check-boxes, for example, and to pre-populate data from the CSBG State Plan for the reporting year covered by the Annual Report.

In addition, by using the OLDC system, which is the central, web-based reporting tool that OCS uses for other programs and eventually intends to use for CSBG forms, both Federal and State staff have the ability to access data easily and track the submission, review, and acceptance of Annual Reports. Overall, OLDC will increase the transparency and accountability of the submission and review process. Use of OLDC will also allow OCS and its grantees to create new tools for analysis and sharing of information between States and with the general public. While States and eligible entities will spend additional time in the first year of using the new report, learning the new system and entering 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 Annual Report information.

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

The information in Module 1 of the Annual Report will require information submission from State grantees. Some of the required information in Module 1 will be reported by States through regular information collection methods, from eligible entities that receive CSBG funds, through customary management and oversight processes. The information for the Modules 2, 3, and 4 of the Annual Report will require information submission from eligible entities that receive CSBG funds.

Anticipated burden for both grantees and sub-grantees is addressed in section 12 of this justification form. This includes 52 grantees (50 states plus the District of Columbia and Puerto Rico), and 1,035 Sub-grantees. Eighty-eight percent of the sub-grantees are private entities, seven percent are public entities and the remainders are limited purpose or tribal entities. These eligible entities will be required to collect and report the necessary information. Many of the entities already have performance management systems in place and collect some of the proposed data elements. The CSBG Annual Report will require updates and modifications to current customary data collection and reporting systems for the majority of the grantees and sub-grantees. No small businesses or other small entities are involved in this information collection.

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

The information collection is required by law in order for States and eligible entities to account for and meet annual performance measurement requirements for Federal CSBG funds (please see item 1 above). OCS would not be able to account for CSBG funding or meet annual requirements to report to Congress on the use of funds without this collection.

#### **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 CSBG Annual Report 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 2012, OCS awarded a cooperative agreement to the National Association for State Community Services Programs (NASCS) to assist OCS in developing the CSBG Annual Report. This work involved significant interaction with the CSBG Network, including 30 listening sessions held across the country, and numerous presentations and webinars to engage states and local entities on the development. Expert workgroups with representatives from the state, local, national, and Federal levels were convened to provide direction.

From March 3, 2016 – April 13, 2016, NASCS invited the CSBG Network to provide feedback on content for the Annual Report forms. In response, over half of the CSBG network provided thoughtful responses, comments, and letters. In addition, OCS worked with NASCS and a small work group of States to obtain input on Module 1 of the Annual Report. OCS and NASCS analyzed all the responses and suggestions and used the feedback to prepare the forms reviewed during the first Federal Register Notice review in June 2016.

In a notice in the *Federal Register* posted on June 16, 2016 (Volume 81, Number 16, Pages 39267-39268), ACF solicited public comment on the proposed collection.

In response to the 60-day notice, OCS received 134 sets of comments from organizations across the CSBG Network, including national organizations, State CSBG Lead Agencies, State Community Action associations, and local eligible entities. In addition, OCS received dozens of informal questions and comments during webinars and training events.

OCS organized all the comments and carefully considered each one. During this review process, OCS consulted with national CSBG technical assistance partners and practitioners to discuss the major areas of concern and allow the partners' to suggest solutions. As a result, the CSBG Annual Report submitted in this PRA package has been significantly revised from the first Annual Report posted for comment.

The major areas of concern raised by the commenters during the first comment period and OCS revisions and responses to each area are described below:

- A. **Module 1: Question B.2 (Eligible Entity Overall Satisfaction Targets, and Question B.3 (Feedback and Involvement):** Some State commenters expressed concerns about requirements that States establish customer satisfaction targets for the American Customer Satisfaction Index (ACSI) survey. Commenters indicated that States had not been fully informed of reporting requirements and responsibilities, that additional guidance was needed in the establishment of targets, and that some States

would not be able to respond due to a need for a statistically significant response rate. In addition, commenters expressed concerns about the ability of OCS to administer the ACSI survey on a regular basis and provide timely feedback to the States. In response, OCS modified instructions in the Annual Report to indicate that States that did not receive an ACSI score (due to the fact that there is only a single eligible entity in the State) will not be required to provide a response to question B.2 and should provide a narrative response describing other sources of customer feedback in question B.3. During the public comment period, OCS issued new guidance ([CSBG IM #150 Use of the American Customer Satisfaction Index \(ACSI\) to Improve Network Effectiveness](#)) regarding the establishment of realistic ACSI targets based on previous scores. OCS previously required the establishment of ACSI targets in the CSBG State Plan and has successfully conducted and communicated an ACSI survey of eligible entities on a timely basis. With the exception of the 3 States (AK, DE, and DC) that have only a single eligible entity, OCS was able to provide results at an 80% confidence interval to all other States. IM-150 communicates expected dates for the next round of the ACSI survey and OCS will work through an interagency agreement to utilize the CFI Group to conduct the ACSI. OCS will seek an updated OMB approval of the ACSI per prior discussions with OMB, Office of Information and Regulatory Affairs.

- B. Module I, Question B.7. (Summary Analysis):** Several commenters expressed concern that a question requiring State analysis of data from eligible entities had not been sufficiently vetted with States, would require going beyond reporting the data and instead require States to conduct sophisticated data analysis requiring additional time; would exceed the capacity of many State CSBG Lead Agencies to provide meaningful information, could be subjective, and could result in States asking the eligible entities for information beyond what is in the Annual Report, therefore adding to the reporting burden. In response, OCS has removed this question from the Annual Report. While OCS will continue to support enhanced capacity for data analysis, we have concluded that consistent with the CSBG Act, questions related to analysis of data will be more appropriately framed in the context of State support for local analysis of results through the Results Oriented Management and Accountability (ROMA) system. In Section I, which requires a description of the State's ROMA system, OCS has modified questions I. 4 to request information on the process for State consultation with eligible entities regarding quality of data, notable trends, and progress on targets. OCS has also clarified instructions in Section I to focus on a previously communicated State Accountability Measure which requires States to provide timely written feedback to eligible entities regarding progress in meeting ROMA goals.
- C. Module I, D.2. (Organizational Standards)** Several commenters were concerned that the requirement for States to set targets and report on the number of eligible entities that met all State-established organizational standards was an “all or nothing”



approach and would not allow States to demonstrate progress among eligible entities in meeting standards. Some commenters recommended ranges of compliance (e.g. 0-50%, 51-75%, etc.) and another commenter recommended reporting on the number of entities that meet each specific standard. In response to these comments, OCS reviewed and revised the tables for this question. While the requirement to establish targets for the number of eligible entities that meet all organizational standards was previously communicated in IM-144 and was included as a question in the online State CSBG Plan, OCS recognizes the importance of progress indicators and has modified the table for question D.2 to allow States to report on the number and percentage of eligible entities meeting organizational standards in three lower tiers (90-99%, 80 to 89%, and 70-79%). While States will not be required to establish targets in each of these lower tiers, it is expected that this approach will allow States to demonstrate progress in increasing the percentage of eligible entities that meet most standards. In addition, OCS has added a table for States to report on the number and percentage of eligible entities that meet organizational standards in specific categories (board governance, financial operations and oversight, etc.) which will help identify areas in which standards are generally being met and areas requiring technical assistance and support to help eligible entities meet all required standards.

**D. Module 2. Table 1. (Local Agency CSBG Expenditures Data Entry Form)** While comments on Module 2 were generally limited, some commenters did express concern that tables provided for eligible entities to describe CSBG expenditures did not include a separate category for administrative expenses, but that eligible entities were instead required to report the percentage of funds expended for administration in a separate question. While OCS considered these concerns, the table and question on administrative expenses was maintained in the same format. OCS notes that the current format is consistent with the previous reporting format used by States in the CSBG-IS system and is consistent with prior OCS guidance regarding the treatment of CSBG administrative expenses consistent with an indirect or administrative rate applied to all agency expenditures.

**E. Module 2. Lack of National Agency Capacity Goal.** A number of commenters expressed concerns that the Annual Report (and other OCS guidance) do not include a national goal for agency capacity. Previously-communicated ROMA guidance had included six national goals, including a goal focused on the increased capacity of eligible entities to deliver results. While OCS considered these comments and supports the importance of organizational capacity to deliver results, the information collection instruments were not changed. In the judgment of OCS, the goals for CSBG are most appropriately focused on outcomes for individuals, families, and communities, while the capacity of eligible entities to deliver results is not included as a goal, OCS has emphasized the importance of agency capacity through the establishment, measurement, and reporting on organizational standards and other

accountability measures established in the CSBG performance management framework.

- F. **Module 3. Community Level Strategies and “Collective Impact”:** Commenters indicated that “collective impact” initiatives included as a potential community-level strategy in the module are one of many strategies that may be used to promote interagency collaboration for community-level change. Commenters recommended revision of this module to focus on a more plain language description of the activities referred to as “collective impact” strategies. In response to these comments, OCS removed reference to “collective impact” initiatives and instead will allow agencies to indicate that “CAA is the core organizer of multi-partner initiative or CAA is one of multiple active investors and partners” to reflect a broad array of collaborative efforts undertaken by eligible entities in the CSBG network.
- G. **Module 3. Community Level Indicators:** Multiple commenters provided input on the community-level indicators included in Module 3. Specifically, commenters expressed that indicators focusing on changes to population level indicators (e.g. high school graduation, teen pregnancy, child abuse, etc.) are often impacted by many causes beyond the influence of an initiative. Some commenters also expressed concerns that “social indicators” (such as obesity rates in a community) may not be appropriate measures for CSBG eligible entities. Commenters were concerned about language in the instructions requiring agencies to provide a “justification” if a baseline was not provided was inappropriate. Although all the proposed indicators are optional, there were significant concerns noted across the comments with many of the indicators. To address these concerns, OCS restructured the community level indicators to provide eligible entities with the option to select between “counts of change” and “rates of change” in communities. New instructions have been added to Module 3 to clarify that all measures are optional, eligible entities have full flexibility to select the most appropriate indicators that best match the goals of their community-level initiative or construct their own measure and insert it in an “other” category. Where there were not a sufficient number of “counts or rates of change” OCS added additional optional indicators. Communities that select indicators focused on “counts of change” will set a specific target (e.g. number of employment opportunities expected to be created in the identified community) and then report on the actual results. Communities that select indicators focused on “rates of change” will identify a community level rate (e.g. youth unemployment) for an identified community, report a baseline level, and report on changes over a multi-year time period. OCS has also added instructions that encourage an abundance of caution when using the “counts of change” measures and establishing baselines and targets. To aid in the process, several elements of the measure will be auto calculated to ensure accuracy. OCS removed the reference to “justification” for selection of items without a baseline.

- H. **Module 4. Characteristics for New Individuals and Families Served.** Multiple commenters indicated that a requirement that eligible entities report on the number of new individuals and families served on an annual basis would present a data collection burden, present a challenge to current data systems, and create challenges in definitions for new individuals (e.g. that received services in one year and received a different service in a subsequent year). To address this concern, OCS has removed this requirement and eliminated the accompanying instrument from the OMB clearance package. Consistent with past practice, agencies will report on the demographics and total number of people served in a year and agencies will not be asked to provide a separate report on new individuals and families served.
- I. **Module 4. Stability Indicators.** In the report released for the first comment period, OCS provided options for “stability” indicators that could be used to track overall progress in improving the overall economic security and well-being of individuals and families served by eligible entities. Options included scales of financial well-being or a compilation of the number of individuals and families showing improvement on multiple indicators. Although many commenters supported the overall idea of a stability indicator, commenters disagreed regarding the appropriateness of the proposed indicators of stability and did not see the indicators as representative of stability. To address these concerns, OCS has removed the stability indicators domain. Instead, OCS has moved the proposed financial well-being measure to the income and asset building domain as one of many optional indicators. In addition, a new section was created/titled “outcomes across multiple domains” and the previous “multiple outcomes achieved” indicator was placed in this section.
- J. **Module 4. Unduplicated Counts.** Several commenters expressed concern regarding the expectation for unduplicated counts of individuals served by eligible entities. Commenters expressed concerns that some agencies have separate data and reporting systems for selected programs and do not have the capacity to provide an unduplicated count for these systems. Because the expectation for an unduplicated count has been a longstanding expectation of in the CSBG Annual Report , OCS did not change reporting forms. However, OCS does recognize that some agencies and data systems do not have the capacity for an unduplicated count for all services provided by the agency. Current forms do allow eligible entities to provide an estimate of the number of people served in programs that cannot be included in the unduplicated count.

## 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**

Based on comments in response to the 60-day Federal Register notice, OCS increased the hourly burden estimate. In the first Federal Register notice published in volume 81 FR 39267, number 2016-14229, pages 39267-39268 on June 16, 2016, OCS estimated a total of 164 burden hours for each state grantee and a total 8,551 hours per CSBG Annual Report across the 52 States. OCS also estimated a total for 242 burden hours for each sub-grantee for a total 250,585 hours per CSBG Annual Report across the 1,035 sub-grantees. In addition to the feedback received during the 60-day comment period, OCS consulted a small group of grantees and used historical information on state and agency capacity to inform the hourly burden estimate.

Commenters submitted a wide range of estimates for hourly and cost burden, which was informed by their unique set of circumstances (e.g. size, budget, technical capacity, etc.). The estimates provided insight into the potential burden of the proposed CSBG Annual Report and specifically highlighted areas of the highest burden. OCS made substantial revisions (see item 8E above) to the proposed reporting instruments that are expected to reduce the overall burden. While the revisions—and particularly the elimination of the report on the characteristics of new individuals and families served and the elimination of summary analysis questions—are expected to reduce the actual burden for completion of the Annual Report, OCS increased the overall estimate based on input received in the public comment period regarding the realities of data and time burdens connected to this report. It is important to note that the majority of the data included in this report is similar to the data currently included in the CSBG IS tool routinely used by States and eligible entities; as such a large percentage of the time and burden represented in this estimate is comparable to the current burden of completing the CSBG IS.

In order to capture the variance in burden estimates for the grantees and sub-grantees, OCS revised the burden estimate to reflect a range of burden hours. OCS estimates it will take each grantee between 144-252 hours to complete the CSBG Annual Report and each sub-grantee between 508-885 hours to complete the CSBG Annual Report. This includes time for data entry and review, data collection, developing new performance management elements, and training and technical assistance.

In order to calculate the national average and range of burden hours, OCS estimated the hourly burden for grantees and sub-grantees based on the following: 1) data entry and review; 2) data collection; and 3) training and technical assistance for every module and

section of the CSBG Annual Report over a three year period. OCS also considered whether data was new or “usual and customary” as part of the CSBG IS reporting. This data collection estimate was projected across three years to capture the expected decrease in burden, and included in the calculation for the total range of projected burden hours. The burden is presented as a range to capture the expected variation in hourly burden and hourly cost based on capacity for grantees and sub-grantees. The range of hours can be assessed based on the following:

- Presence of centralized information systems at the state and/or local level;
- Whether the data systems are de-centralized information systems and/or have a lack of direct electronic data interchange;
- Number of diverse funding streams at the agency level, which relate to the number of reporting requirements and data systems;
- Length of time current data systems have been in place at both state and agency levels;
- The number of FTEs/staff, which informs capacity and time burdens at the state and local level;
- Tenure of staff;
- History with the CSBG IS Survey, ROMA, and Organizational Standards implementation; and
- Number of agencies and the variety of agencies present in a state (i.e., number of agencies that vary in size, budget, service area, etc.)

**Estimated Annualized Burden Hours**

<b>Instrument</b>	<b>Number of respondents</b>	<b>Number of responses per respondent</b>	<b>AVERAGE RANGE of annualized burden hours per response*</b>	<b>AVERAGE annualized burden hours per response</b>	<b>AVERAGE annualized national burden Hours</b>
<b>CSBG Annual Report</b>	<b>52 Grantees</b>	<b>1</b>	<b>144-252</b>	<b>203</b>	<b>10,556</b>
	<b>1,035 Sub-Grantees</b>	<b>1</b>	<b>508-885</b>	<b>756</b>	<b>782,460</b>

## Estimated Average Range of Annualized Burden Hours by Module

CSBG Annual Report	Grantee average range of annualized hours by Module	Sub-grantee average range of annualized hours by Module
Module 1	38-70 hours	10-20 hours
Module 2	24-39 hours	115-187 hours
Module 3	30-57 hours	115-240 hours
Module 4	52-86 hours	268-438 hours
<b>*AVERAGE RANGE</b>	<b>144-252 hours</b>	<b>508-885 hours</b>

### 12A. Hourly Cost Burden Estimate Calculation

The hourly cost burden estimate was calculated based on the hourly burden estimate (in the section above) and captures the cost of staff time. The hourly wage value for the grantee and sub-grantee hourly cost burdens was calculated using wages provided by the Bureau of Labor Statistics<sup>1</sup>. The grantee 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 2015, the most current information available, the Bureau of Labor Statistics indicates that \$25.55 is the median hourly wage for Social and Community Service Managers. Using this median hourly wage, the estimated annualized burden costs for each respondent is between \$3,679.20 - \$6,438.60 (144-252 [Range of respondent burden hours] x 25.55 [median hourly wage]).

At the sub-grantee level, weekly wages from 2015 for the following Bureau of Labor Statistics labor categories were used: community and social service occupations (\$889); counselors (\$904); social workers (\$877); social and human service assistants (\$676); and miscellaneous community and social service specialists, including health educators and community health workers (\$831). When averaged, the wage for these types of occupational pay rates is \$835.40 a week, or \$20.88 an hour. Using this median hourly wage, the estimated annualized burden costs for each respondent is between \$10,607.04- \$18,478.80 (508-885 [Range of sub-grantee burden hours] x 20.88 [median hourly wage]).

Using the national standard for a full-time work week, 40 hours a week for 52 weeks for a total of 2,080 hours a year, it is possible to estimate the weekly burden of the estimated hours for an employee working a full-time position. For a state employee (grantee), the range of estimated hours is between 144-252 hours, which is equal to about 4-6 weeks of a working year spent collecting data, being trained on data collection and entry, and data

<sup>1</sup> <http://www.bls.gov/cps/cpsaat39.htm>

entry and review. For sub-grantee employees, the range of 508-885 hours is equal to 12 to 22 weeks of a working year spent collecting data, being trained on data collection and entry, performance management, and data entry and review.

### Estimated Annualized Burden Costs

Instrument	Number of respondents	Bureau of Labor Statistics Hourly wage	RANGE of yearly cost per response	AVERAGE yearly cost per response	AVERAGE National Cost
CSBG Annual Report	52 Grantees	\$25.55	\$3,679.20 - \$6,438.60	\$5,186.65	\$269,706
	1,035 Sub-Grantees	\$20.88	\$10,607.04- \$18,478.80	\$15,785.28	\$16,337,765

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

The data collection procedures for the CSBG Annual Report will require a range of improvements and enhancements to data systems currently used by grantees and sub-grantees. It is important to note that a majority of the data included in this report is similar to the data reported in the CSBG IS, and as such a large percentage of the cost represented in this estimate covers the current burden of completing the CSBG IS.

In order to calculate the estimated capital cost burden, OCS projected the cost burden estimate in four key areas – start up; operation; upgrades/modifications; and systems training and technical assistance – for both states and agencies, by year and by current capacity, with the assumption that the costs would start off high and then decrease over time. The capital cost burden is presented as a range to capture the expected variation in capacity among grantees and sub-grantees. Just as there is a wide range in capacity among grantees and sub-grantees, there is also variation in the investments required for individual grantees and sub-grantees to implement the CSBG Annual Report. Smaller grantees and sub-grantees may be able to make small and less costly adjustments to their current process for completing the CSBG IS and alternately, larger grantees and sub-grantees managing multiple data systems may need to make more substantial investments in order to modify their current practices. This was considered in calculating the average burden cost.

The estimated range of cost burden per grantee is \$48,365 - \$170,775, with an average cost per grantee of \$98,784. The estimate range of cost burden per sub-grantee is \$5,306-\$38,080, with an average cost per grantee of \$18,758. The tables below provide greater

detail on the expected reduction of costs over a three year period.

### Estimated Other Annual Costs to Respondents and Record Keepers

Instrument	Number of respondents	Number of Respondents per respondent	AVERAGE RANGE annualized national burden cost per response*	AVERAGE annualized burden cost per response	AVERAGE National burden cost
CSBG Annual Report	52 Grantees	1	\$48,365 - \$170,775	\$98,784	\$5,136,768
	1,035 Sub-Grantees	1	\$5,306- \$38,080	\$18,758	\$19,414,530

### Estimated Range of Annual Costs to Respondents and Record Keepers by Year

	ESTIMATED RANGE of burden costs Per Grantees	ESTIMATED RANGE of burden costs Per Sub-Grantees
Year 1	\$65,230-\$279,232	\$8,395-\$89,943
Year 2	\$42,510-\$149,393	\$4,732-\$18,756
Year 3	\$37,356-\$83,699	\$2,792-\$5,542
<b>*AVERAGE RANGE</b>	<b>\$48,365 - \$170,775</b>	<b>\$5,306- \$38,080</b>

## 14. Annualized Cost to the Federal Government

Federal Government Staff tasks associated with the collection of these data include:

1. **OLDC Form Development** – Developing specifications for the OLDC data collection forms. This is a one-time cost.
2. **Grantee Communications and Training**– Notifying grantees of the reporting requirements, providing training through conference calls, webinars, and in-person, and conducting follow-up with grantees.



3. **Report Review and Analysis** – Reviewing submitted reports and working with grantees to assure complete, accurate and accountable information consistent with OCS guidance.

OCS will utilize a contractual interagency agreement for the development of web-based forms, architectural system design and development, and technical support. A cooperative agreement has been used towards form development and will be utilized for ongoing training and technical assistance as well as analysis of Annual Report data.

The table below furnishes information on the estimated Federal Staff hours and costs associated with each task:

**Annual Federal Staff Hours and Costs**

<b>Task</b>	<b>Number of Hours</b>	<b>Rate</b>	<b>Total Cost</b>
OLDC Form Development	360	\$66/hour	\$23,760
Grantee Communications and Training	320	\$66/hour	\$21,120
Report Review and Analysis	550	\$66/hour	\$36,300
<b>Subtotal:</b>			<b>\$81,180</b>

The table below furnishes information on the estimated Federal Contractor costs associated with each task:

**Annual Federal Contract and Cooperative Agreement Costs**

<b>Task</b>	<b>Total Cost</b>
CSBG Data Portal Development IAG	\$259,990
CSBG Data Cooperative Agreement	\$900,000
<b>Subtotal:</b>	<b>\$1,159,990</b>

Total federal government costs are **\$1,241,170**.

Note: Considering the FY16 CSBG Allocation of \$715,000,000, the estimated combined local, State, and Federal cost of \$42,399,939 is 6% of the total FY16 CSBG appropriation.

**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 the requirements of the CSBG Act as described under item 1 of this supporting statement.

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

As described under item 1, OCS will use the information from the Annual Report for a required annual report to Congress and is exploring options for making Annual Report information publically available online. OCS plans to make some information publically available through a website and a project time table will be made publically available when established through an OCS work group. Information from Module I will be shared with OCS technical assistance providers for planning and prioritization of training and technical assistance.

**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