

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

Updated May 24, 2017

Changes Highlighted

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.

American Customer Satisfaction Index Survey: As part of the CSBG Performance Management Framework, OCS plans to utilize the American Customer Satisfaction Index (ACSI) to obtain input from CSBG eligible entities regarding State CSBG Lead Agency performance as well as areas for technical assistance from OCS. This information request is being modified to include the ACSI survey instrument, which has been previously administered for CSBG using a blanket clearance for ACSI, OMB Control No 1090-0007. In August 2016, OCS published an [Information Memorandum \(IM\) 150, Use of the American Customer Satisfaction Index \(ACSI\) to Improve Network Effectiveness](#).

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 Community 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.

The data in the ACSI survey for eligible entities will be available to the states for use in developing the FY 2018 State Plans. The data will also help OCS and the states to better understand performance in certain areas including how well the states are delivering services to local entities and where best to focus training and technical assistance efforts for the State CSBG Lead Agencies. ACSI results will also be used by States to identify areas of improvement to be reported in the CSBG State Plan.

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.

The ACSI survey for eligible entities will be collected through a web-based reporting tool that will enable CFI Group, the independent third-party research group that is administering the survey, to aggregate survey data to OCS, CSBG Lead agencies, CSBG State Associations and the eligible entities.

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.

As a component of the CSBG State Plan, the information collected through the ACSI survey for eligible entities is unique to OCS and no other Federal agency has the statutory requirement to collect this information. Furthermore, the survey has previously cleared

information through OMB and the information has not changed since the survey was last conducted in 2015.

5. Impact on Small Businesses or Other Small Entities

No small businesses or other small entities are involved in this collection of the State plans. Only States and territories are affected.

CSBG eligible entities – which include small nonprofit organizations—will respond directly to the ACSI survey. Participation in this survey is encouraged but voluntary. The ACSI survey results will provide input to states on potential areas for improvement of services to these entities.

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.

The information collection conducted through the ACSI survey for eligible entities on a biennial basis is integral to CSBG performance management. Delay in the information collection would hinder ongoing and timely implementation of state accountability measures related to customer satisfaction from eligible entities.

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.

There is no circumstance that requires the information to be provided or the ACSI survey for eligible entity 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

For the ACSI survey for eligible entities, OMB waived the 60-day notice and no comments were submitted to ACF.

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.

The information collected in the ACSI survey for eligible entities will remain anonymous.

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.¹ Using this median hourly wage, the estimated annualized burden costs is \$53,277.84 (1848 [Total burden hours] x 28.83 [median hourly wage]).

¹ 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).

For the ACSI survey, we estimate a total for 517.5 burden hours, which reflects an average of .5 hours per survey across the 1035 eligible entities. The survey is a web-based form that does not require any training.

The respondents for the ACSI survey are CSBG executive directors for each eligible entity or Community Action Agency (CAA). They manage and/or coordinate the organizations activities. Their duties generally fall under the Social and Community Service Managers Occupation Employment category established by the Bureau of Labor Statistics. For 2016, the most current information available, the Bureau of Labor Statistics indicates that \$31.10 is the median hourly wage for Social and Community Service Managers.² Using this median hourly wage, the estimated annualized burden costs is \$16,094.25 (517.5 [Total burden hours] x 31.10 [median hourly wage]).

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	33	1848
CSBG Eligible Entities	ACSI CSBG Eligible Entity Survey	1035	1	.5	517.5

Estimated Total Annual Burden Hours: 2365.5

12B. Estimated Annualized Burden Costs

Type of Respondent	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
States and Territories	1848	\$28.83	\$53,277.84
CSBG Eligible Entities	517.5	\$31.10 ²	\$16,094.25

Estimated Total respondent costs: \$69,372.09

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

² Bureau of Labor Statistics, U.S. Department of Labor, Occupational Outlook Handbook, 2015-16 Edition, Social and Community Service Managers, on the Internet at <http://www.bls.gov/ooh/management/social-and-community-service-managers.htm> (visited May 23, 2017). Estimated hourly wage rate has increased by \$2.27/hour since prior OMB clearance package submission for CSBG State Plan for OMB clearance.

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).

OCS commissioned CFI Group, an independent third-party research group, to conduct the survey and disseminate individualized results to States at a cost of \$65,000. In addition, OCS will expend approximately \$13,750 (50 hours @ \$275) for consultation services and assistance in the design, implementation and interpretation of survey results.

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.

The addition of the ACSI survey for eligible entities to the current 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.

OCS will not publish the individual state information collected from the ACSI survey for eligible entities under this information collection. OCS will distribute the findings to the states with the expectation that states will communicate with local entities regarding results and appropriate actions related to the findings. OCS will use the state average score in presentations and materials.

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