

OCS-0124 – The Supporting Statement

A. Justification.

1. Necessity of Information Collection

The collection of the Community Service Block Grant (CSBG) State Plan is required by Section 676(b) of the CSBG Act, 42 U.S.C. § 9908.

“SEC. 676. APPLICATION AND PLAN. 42 USC 9908....

...“(b) STATE APPLICATION AND PLAN.—Beginning with fiscal year

2000, to be eligible to receive a grant or allotment under section 675A or 675B, 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. The plan shall be submitted not later than 30 days prior to the beginning of the first fiscal year covered by the plan, and shall contain such information as the Secretary shall require, including—...

2. Purpose and Use of the Information Collection

States and territories develop and submit the data in the Community Services Block Grant (CSBG) State Plan to the Division of Community Assistance (DCA) in the Office of Community Services (OCS). DCA reviews the CSBG State Plans to determine whether grantees have submitted a complete application to qualify for federal funds and comply with the CSBG Act. The revised and automated state plan streamlines both the state development and the federal review of the information. In addition, with the revised and automated 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

OCS began collecting the automated state plan in September 2015. By collecting an automated, web-based form for this information collection, OCS dramatically reduced burden for state and federal staff, while creating new efficiencies and capabilities for program planning, oversight, and accountability. The automated plan gives states the option to select pre-formatted responses with limited-character text boxes, check boxes, and radio buttons, for example. Additionally, the systems allows data to pre-populate from other sections of the plan and a previous year's plan.

States have submitted the automated plan through inForm, previously known as the On-Line Data Collection (OLDC) system, for three years. InForm is the system used by Administration for Children and Families (ACF) for collection of state plans and other forms, such as the SF-424m. With each submission, the burden has drop substantially due to automation, and other inForm features, such as pre-population. As this version maintains the original content of 2016 CSBG State Plan, OCS does not anticipate any additional burden.

OCS uses the data submitted for training and technical assistance and for coordination with the states. Additionally, the data provides information for the annual congressional report, as well as the CSBG Annual Report submitted by states yearly through inForm.

Additionally, OCS is working on a performance management site, which will include data from the CSBG State Plan.

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 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 CSBG Act requires this information collection in order for states to receive federal CSBG funds. 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 automated plan is built to support this requirement.

7. Special Circumstances Relating to Collection of Data

This data request does not require respondents to report more often than quarterly; rather agencies only to have reply annually or biannually. Respondents are provided notice well before 30 days; in previous years, OCS has made the system available at least 60 days in advance. Respondents are only required to submit this one report through inForm. There are no requirements for respondents to retain records for more than three years. The CSBG State Plan does not request non-approved OMB statistical survey or data classification. There is no pledge of confidentiality. Nor does the CSBG State Plan require respondents to submit proprietary trade secret or confidential information.

8. 5 CFR 1320.8 (d) Requirement

The 60 day notice published 11/17/2018, vol. 82 on page 5438.

OCS received comments from 10 individuals, resulting in 87 comments. Of the 87 comments, 45 were unique in that no other comments were made in regards to that particular question. The comments were in whole approving of the revisions to the plan. Of the 45 unique comments, 42 percent requested additional training and guidance, while 58 percent requested additional revisions for further clarity to the plan. OCS further revised the questions in order to provide additional clarity, unless the suggested revision changed the scope of the question. The content of the plan remains the same. Additionally, OCS is planning a webinar series that will assist with additional guidance and training.

In developing the plan, OCS has worked with the National Association of State Community Services Programs (NASCSP), an OCS grantee and representative and advocate for the state grantees (the respondents). The primary contact at NASCSP was Jackie Orr, (202) 370-3666. Additionally, during the last three years of submission, state grantees (the respondents) were encouraged to provide feedback. In large, the CSBG Network is supportive of the automated CSBG State Plan as it streamlines the process.

There were no comments in regards to the cost or hour burden. This project ddoes not relate to another federal program.

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

OCS estimates it will take each respondent 35 hours in the first year to complete the CSBG State Plan, and 29 hours in subsequent years. Given that this is the fourth year states are submitting through inForm, there is greater familiarity with the system and states will have data from the prior submission already in inForm. The first year, OCS anticipates providing optional refresher training, which accounts for the additional hours in year one. The total burden estimate, therefore, is the average of these three years, which is 31 hours for each of the 56 respondents, a total of 1736 burden hours.

For the CSBG Eligible Entity Master List, it is estimated that it will take three hours for the first year, and an hour in subsequent years. States would only be expected to update the CSBG Master List should the list change for any reason, and would only have to update the entity(ies) that have changed since the last submission. The burden estimate is the average of three years, which is 1.67 hours for each of the 56 respondents, a total of 93.5 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 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.¹ Using this median hourly wage, the estimated annualized burden costs for the CSBG State Plan is \$53,989.60 (1736 [total burden hours] x \$31.10 [median hourly wage]), and the estimated annualized burden costs for the CSBG Eligible Entity Master List is \$2,908.47 (93.52 [total burden hours] x \$31.10 [median hourly wage]).

The ACSI Survey of Eligible Entities will be completed by CSBG program managers at the local level (the sub-grantees). They will be responding on the customer service that they receive from the state CSBG grantee. As with the CSBG program managers, their duties generally fall under the Social and Community Service Managers Occupation Employment category established by the Bureau of Labor Statistics. It is estimated that it will take 20 minutes to complete the survey each year. The burden estimate is the average of three years, which is .15 hours for each 1,019 respondents, a total of 152.85 hours. The estimated annualized burden cost for the ACSI Survey of Eligible Entities is \$4,753.64 (152.85 [total burden hours] x \$31.10 [median hourly wage]).

¹ Bureau of Labor Statistics, U.S. Department of Labor, *Occupational Outlook Handbook, 2016-17 Edition*, Social and Community Service Managers, on the Internet at <https://www.bls.gov/ooh/management/social-and-community-service-managers.htm> (visited October 05, 2017).

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 State Plan Application	56	1	31	1736
States and Territories	CSBG Eligible Entity Master List	56	1	1.67	93.5
Sub-grantees	ACSI Survey of Eligible Entities	1019	1	.15	152.85

Estimated Total Annual Burden Hours: 1,982.35

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

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 four (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 CSBG 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. OCS expects Federal staff to spend an average of five (5) hours per state plan reviewing performance and accountability elements in the plan and providing feedback to states.

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 adjustments driving the revision of the CSBG OMB-approved information collection include the need for further clarity to some of the questions. While the majority of the material in the CSBG State Plan remain the same, some questions were revised to provide further clarity to the intent of the question. The revisions were made after thorough review of the state submissions for FY2016 – FY2018 and comments from the CSBG Network, primarily CSBG state grantees. Additional revisions were made based on improvements to the OLDC system. All revisions will result in a more streamlined plan.

Lastly, a CSBG Eligible Entity Master List was added as an additional form. The form is the same as 5.1. within the CSBG State Plan, with a few additional columns. By having it as its own form, it will allow for better tracking of changes to the eligible entities (sub-grantees). Additionally, it will allow for easier pre-population into the CSBG State Plan and the CSBG Annual Report (another OMB-approved form). As this form will pre-populate into 5.1 of the CSBG State Plan, respondents will only have to provide this information once, and then only update it in future when there are changes.

16. Plans for Tabulation and Publication and Project Time Schedule

OCS will not publish the individual state plans collected under this information collection.

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. Collections of Information Employing Statistical Methods

At this time, OCS does not publish this data publically.