

Office of Community Services (OCS) Community Economic Development (CED) Standard Reporting Format

**OMB Information Collection Request
0970 - 0386**

Supporting Statement Part A - Justification

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Office of Community Services
Administration for Children and Families
U.S. Department of Health and Human Services

SUPPORTING STATEMENT A – JUSTIFICATION

Summary

The Office of Community Services (OCS) uses a standardized semi-annual reporting format, implemented in 2011 and renewed in 2014 (approved by the Office of Management and Budget (OMB) - OMB No.: 0970-0386). Grantees of the Community Economic Development (CED) program are required to use this reporting format, called the Performance Progress Report (PPR), to submit performance data twice a year. OCS uses this data to develop comprehensive performance snapshots on each CED grant, as well as to track program performance over time and to conduct cohort analyses. These reports are also used to inform annual reports to Congress on each project's performance. OCS' intent is to obtain approval to continue the use of the PPR for collecting performance data twice a year from CED grantees.

The PPR forms collect both quantitative and qualitative data. The quantitative data elements deal with program outputs and outcomes, while the qualitative questions provide space for grantees to discuss their successes and challenges, as well as changes to their grant that might not be captured in the quantitative section.

By requiring grantees to report on a consistent set of data elements on a twice-annual basis, OCS improves its understanding of grantee success, strengthens its understanding and knowledge of each grantee's progress, and ultimately enhances the efficacy and effectiveness of CED grant dollars. Overall, the standardized reporting format increases the quality and clarity of the data collected by OCS, while providing a singular, clear data collection tool for grantees.

1. Circumstances Making the Collection of Information Necessary

One of the ongoing priorities at the Office of Community Services (OCS) is to improve performance and accountability. Monitoring the Community Economic Development (CED) program closely in order to better measure success and to understand and replicate the programs and projects that excel has been and continues to be a priority for OCS. OCS works in partnership with states, communities, and other agencies to provide a range of human and economic development services and activities, which ameliorate the causes and characteristics of poverty and otherwise assist persons in need. OCS continues to have great success in the realm of poverty reduction and community development. However, measuring that success in a systematic way has not always been easy.

The Performance Progress Report (PPR) is a critical part of the evaluation strategy for the CED program and allows OCS to continue to collect program data that supports a performance-based environment that emphasizes accountability and achieving results.

The legislative requirement for the CED program is in Title IV of the Community Opportunities, Accountability, and Training and Educational Services Act (COATS Human Services Reauthorization Act) of Oct. 27, 1998, Pub. L. 105-285, section 680(b) as amended:

“The Secretary shall require all activities receiving assistance under this section to be evaluated for their effectiveness. Funding for such evaluations shall be provided as a stated percentage of the assistance or through a separate grant awarded by the Secretary specifically for the purpose of evaluation of a particular activity or group of activities.”

Adoption of the PPR in 2011 ensured that all grantees provide the relevant data needed in order to comply with their grant requirements through their semi-annual PPR. The current PPR (OMB Control Number 0970-0386) used by CED grantees was approved in 2011, was renewed in 2014 (with minor updates), and was renewed again in 2017 (with minor updates). The standardized reporting format ensures accurate program data collection, and the PPR clarifies the data elements and time periods involved in each data collection effort. OCS uses this data to develop comprehensive performance snapshots on the programs, as well as to track program performance over time and to conduct cohort analyses.

2. Purpose and Use of the Information Collection

The primary purpose of the PPR forms is to collect data in a uniform and systematic manner for a CED discretionary grant program. The reporting format gathers uniform program performance data from each grantee and ultimately informs reporting on program-level outputs and outcomes. OCS utilizes an online reporting system that automatically aggregates grantee data and provides the response rates necessary to execute comprehensive snapshot, cohort, and longitudinal analyses of program outcomes. This allows for improved monitoring and evaluation of the CED program.

The PPR is categorized by the following programmatic goals:

- To create new businesses to employ low-income individuals
- To expand existing businesses to employ low-income individuals
- To create position to employ all individuals (low-income and non-low-income)
- To create positions to employ low-income individuals
- To create full-time positions with benefits for low-income individuals
- To prepare low-income individuals for employment
- To employ low-income individuals in positions created
- To create full-time positions for low-income individuals with opportunity for advancement
- To help low-income individuals retain new jobs
- To leverage additional funds to increase project success

Each programmatic goal contains a set of associated questions to track program outputs and, where appropriate, outcome measures. In most cases, outcomes are measured by the retention of an output for either six or 12 months. Data obtained through the PPR is currently used and will continue to be used for multiple purposes to support CED program monitoring and evaluation.

Annual Report to Congress. By measuring program outcomes, OCS is able to analyze grantee

performance and demonstrate the program's success in the Annual Report to Congress. The report provides Congress with a snapshot of the performance of CED grant projects that were awarded, in progress, and completed in a given year. OCS uses data obtained through the PPR to present grantee performance on key indicators, such as number of businesses created or expanded, number of jobs created, or amount of funds leveraged, in a given year.

Technical Assistance. OCS uses the data obtained through the PPR to identify grantees in need of technical assistance based on individual grantee outcomes. This allows OCS to better allocate and manage limited technical assistance resources and funds.

Project Monitoring Dashboards. OCS develops monitoring tools and dashboards that incorporate data from the PPR. Such tools provide high-level program snapshots, help OCS staff and leadership monitor project progress, and allow for early identification of warning signs and grantee challenges so they can be reviewed and addressed quickly.

3. Use of Improved Information Technology and Burden Reduction

Grantees currently submit data for the PPR format through an online reporting system—The Online Data Collection System (OLDC). The online reporting system reduces the burden on grantees by establishing clear reporting and data collection expectations and ensuring that all grantees provide the relevant data needed in order to comply with their grant requirements. The OLDC system can be accessed by grantees from anywhere with an internet connection, and it supports a streamlined data submission and revision process. Grantees are familiar with these reporting requirements and the system, which they have been using to submit their semi-annual PPRs since 2011.

4. Efforts to Identify Duplication and Use of Similar Information

The PPR forms replaced both the previously-used semi-annual reports and the annually administered OMB-approved surveys. No similar data are available from other studies, because this evaluation is specific to the CED discretionary grant program and its grantees. Although some of the grantee performance data requested is similar to the data that was previously gathered from both the evaluation questionnaires and the grantee annual reports, the current reporting format condenses the data collected into one instrument. Further, the instrument clarifies the data elements requested from grantees and sets more specific guidelines for data collection. Ultimately, it provides a significantly more detailed and accurate picture of how the grantees are implementing and performing programs.

5. Impact on Small Businesses or Other Small Entities

The bulk of CED grantees are small entities. The PPR forms have been designed to ensure that the information being requested is held to the absolute minimum required to obtain accurate

performance data. In addition, the reporting format establishes clear expectations for data collection and reporting — potentially reducing the burden for grantees that were collecting data that was not being used by OCS, or who were surprised by data elements requested and had to piece together information from varied sources. Additionally, grantees are now familiar with these reporting requirements and the system, which they have been using to submit their semi-annual PPRs since 2011.

6. Consequences of Collecting the Information Less Frequently

Respondents are required to submit the PPR forms twice a year. Consistent and timely reporting is required in order to track grantees' progress over the course of their grants, which last either three or five years. It is also required for tracking the progress of annual cohorts of grantees.

Regular semi-annual reporting is the current reporting requirement for the grantees and allows OCS staff to identify grantees in need of assistance, and to respond to those needs in time to keep the projects on track to meet their timelines and goals. Reducing the reporting requirement to an annual basis would diminish the opportunity for OCS staff to manage their CED grant portfolios and help under-performing grantees. OCS would only become aware of program challenges at the end of the fiscal year, which in many cases represents one-third of a grantee's grant period. Additionally, the data collected in the semi-annual reports is included in annual reports to Congress.

Grantees are only required to submit semi-annual reports while their grants are active. An active grantee is defined as a grantee with currently open program dates, meaning the grantee's projects are operational.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

This data collection fully complies 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 accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on October 18, 2019, Volume 84, Number 202, page 55969, and provided a sixty-day period for public comment. During the notice and comment period we did not receive comments.

9. Explanation of Any Payment or Gift to Respondents

The respondents are grantees and will not require an additional payment or gift.

10. Assurance of Confidentiality Provided to Respondents

The grantee data collected from the CED PPR forms will not be treated in a confidential manner. The topics focus on the outputs and outcomes of programs funded with Federal dollars. There are no questions of an inherently sensitive nature in the questionnaire. OCS will not use the term “confidential” in its correspondence with respondents and will use other appropriate language (such as “kept private to the extent permitted by law”) as necessary.

11. Justification for Sensitive Questions

There are no questions of an inherently sensitive nature included in the PPR forms.

12. Estimates of Annualized Burden Hours and Costs

The estimated burden is not expected to increase from the current version. The PPR is estimated to result in a total of 387 annual burden hours. Using wage data from May 2018, average hourly wage is \$34.46. The job code used for estimating total annual cost is occupation code: 11-9151, Social and Community Service Managers. <https://www.bls.gov/oes/current/oes119151.htm>. To account for fringe benefits and overhead the rate was multiplied by two which is \$68.92. The estimate of annualized cost to respondents, accounting for fringe benefits and overhead is \$26,672 (387 hours x \$68.92).

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage (accounting for fringe benefits & overhead)	Total Annual Cost
OCS CED Standard Reporting Format	129	2	1.5	387	\$68.92	\$26,672

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

Respondents are not subject to capital and start-up costs. Any additional cost should be marginal.

14. Annualized Cost to the Federal Government

The table below summarizes the total annualized cost to the Federal Government. The “Federal Review” estimate uses wage data from January 2019, Government Accounting Office General Schedule (GS) Wage Table Data for the Locality Payment Area of Washington-Baltimore-Arlington-DC-MD-VA-WV-PA (Two - GS 12 step 8 and GS 13 step 8). Based on this, the average hourly wage estimated for these employees is \$54.88. To account for fringe benefits and overhead the rate was multiplied by two, which is \$109.76. Similarly, the “Data Cleaning/Analysis” estimate is based on an average 2019 hourly rate (inclusive of fringe benefits and overhead) for senior and junior contractor staff members currently undertaking these tasks. Therefore, the total Federal cost would be \$58,481.36 annually.

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Hours	Annual Burden Hours	Average Hourly Wage for Program Specialists (accounting for fringe benefits & overhead)	Total Annual Cost
Federal Review of OCS CED Standard Reporting Format (Federal Staff)	129	2	2	516	\$109.76	\$56,636.16
Data Cleaning/Analysis for Annual Report to Congress (Contractor)	NA	NA	20	20	\$92.26	\$1,845.20
Total	129	2	2	536	\$204.14	\$58,481.36

15. Explanation for Program Changes or Adjustments

There are no changes to the information collection tool since the last OMB approval. The number of grantees has decreased since funding for this program was reduced over time and fewer grants have been awarded annually, resulting in fewer grantees.

16. Plans for Tabulation and Publication and Project Time Schedule

PPR forms are submitted by grantees through the OLDC. Grantees are required to submit the PPR at the end of April and October, during each year of their grant. For the semi-annual reporting period of September 30th-March 31st each year, the system is open from April 1st-30th

for grantees to submit PPRs. For the semi-annual reporting period of April 1st-September 29th each year, the system is open from October 1st-31st for grantees to submit PPRs. Each PPR submission will be reviewed and used for data analysis for overall program reports as well as individual grantee monitoring reports throughout the year.

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

The OMB Control Number and expiration date will displayed on the upper right corner of each page of the PPR forms.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

OCS is not seeking exception to certification for the Paperwork Reduction Act Submission for this data collection.