

Community Services Block Grant (CSBG) Annual Report

**OMB Information Collection Request
0970 - 0492**

Supporting Statement Part A - Justification

April 2021

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

SUPPORTING STATEMENT A – JUSTIFICATION

In November 2020, the Office of Community Services (OCS), Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS), requested expedited review from the Office of Management and Budget (OMB) and simultaneously invited public comments on the proposed collection of data for new Community Services Block Grant (CSBG) CARES Supplemental and CSBG Disaster Supplemental funding Annual Reports. OCS proposed to collect this information through modified versions of the currently approved CSBG Annual Report. OMB approved the emergency request for 6-months. At this time, OCS is submitting a request to extend data collection, with minor revisions to materials based on public comments.

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 CSBG Act specified that this may be a performance measurement system for which 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 CSBG, including an accounting of funds spent on administrative costs by the state and 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.

OCS and the CSBG Network – CSBG eligible entities, state CSBG lead agencies, state Community Action Associations, national partners, and others – collaborated in a multi-year effort to create a performance management effort in order to meet these requirements and

strengthen overall program management. This multi-year effort resulted in the CSBG Performance Management Framework, which 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 CSBG Network (federal, state, and local) and to enable program administrators at all levels to make better program decisions based on data. Ultimately, the 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 July 2, 2018, OCS received the second OMB-approval for the CSBG State Plan (OMB No. 0970-0382), which is collected electronically through the ACF Online Data Collection (OLDC) system, which is the same system states use to submit their 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.

On February 28, 2020, OCS received the second approval from OMB for the CSBG Annual Report. The CSBG Annual Report includes the following four modules:

- **State Administration Module (Module 1)** *completed by State CSBG Administrators:* focuses on state administration of CSBG funding, including distribution of funds to eligible entities, use of state administrative funds and discretionary funds for training and technical assistance, 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.
- **Eligible Entity Data Module (Module 2)** *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.
- **Community Level Module (Module 3)** *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.
- **Individual and Family Level Module (Module 4)** *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.

More information about the implementation of the CSBG Annual Report is available in [CSBG Information Memorandum \(IM\) 152: CSBG Annual Report.](#)

In February 2020, OCS made the following minor revisions to the four modules CSBG Annual

Report.

- Module 1 was revised to better correlate with the OMB-Approved CSBG State Plan, to clarify questions (for example, to show that OCS is requesting an update to language previously submitted in the CSBG State Plan) or to reflect a change in technology, as these reports are submitted through inForm, more commonly known as the On-Line Data Collection system (OLDC).
- Updates were also made based on public comments during the 60 day comment period.
- Modules 4 revisions include technical changes, such as minor changes to wording, updates to headings, and the addition of numbering. Updates were also made based on public comments during the 60 day comment period.
- Modules 2 and 3 revisions include technical changes to headers and instructions, but no changes were made to questions asked.

CSBG CARES and CSBG Disaster Supplementals

OCS received disaster appropriation and CARES Act supplemental money through the CSBG program in federal fiscal year (FFY) 2019 and FFY 2020, respectively. CSBG grantees are required to submit a report accounting of the expenditure of supplemental funds received by the state through these funding sources. OCS did not have reporting mechanisms in place for CSBG grantees to report on their use of these supplemental funds and therefore created supplemental reports. These supplemental reports were approved through an emergency request and approval in November 2020. The CSBG CARES and Disaster Supplemental reports allow all states and agencies to appropriately use funding, update their systems as needed, and collect the required data related to the CARES and Disaster Supplemental funding.

The CSBG Supplemental Annual Reports are stand-alone reports and include modified versions of Modules 1, 2, and 4 from the current CSBG Annual. Respondents continue to complete Module 3 through the current CSBG Annual Report but are now given the option to indicate whether CSBG CARES or CSBG Disaster Supplemental funds were used to support a community-level initiative.

- To develop the supplemental reports, OCS updated the current CSBG Annual Report version of Module 1 to better correlate with the CSBG Disaster Supplemental and CSBG CARES Application Plan, by revising and removing questions that were not pertinent to the supplemental and to help reduce the burden to the states.
- To develop the supplemental reports, OCS updated the current CSBG Annual Report version of Modules 2 and 4 to include technical changes to specifically request information for the CARES and Disaster Supplemental funding, such as minor wording changes — including updating headers and revising numbering.
 - After receiving initial approval, in response to the 60-day federal register notice, and in communication with the CSBG Network, OCS added a narrative to Module 2 for both the CARES and Disaster Supplemental Annual Reports, and added a few specific data points to Module 4 of the CARES Supplemental Annual Report only.

2. Purpose and Use of the Information Collection

As outlined in Section A1, OCS designed the CSBG Annual Report to support a multi-level Performance Management Framework. The data provided in the CSBG Annual Report is 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 encourages 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 CSBG Annual Report supports 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 CSBG Annual Report supports oversight and technical assistance, and promotes 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 provide necessary information to report to Congress as required under Section 678E(b)(2) regarding:

- how funds were 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 receiving 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 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
- use of CSBG funds to provide training and technical assistance to eligible entities.

OCS is currently using Module 1 for the fifth time, and Modules 2 – 4 for the third time. OCS uses this information to oversee CSBG and state progress on the performance management framework elements, including state accountability measures and the continuous improvement of eligible entity organizational standards. Additionally, OCS uses

this information to develop the CSBG Report to Congress, provide training and technical assistance, and to manage a new performance management website. The performance management website is expected to launch in 2021/2022. The website will support the analysis of trends and data at the national-, state- and local-levels and the identification of 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.

CSBG CARES and CSBG Disaster Supplemental

The purposes and uses of information from the CARES and the Disaster Supplemental reports are consistent with the purposes and uses described above. The supplemental reports are modified versions of modules collected through the regular CSBG Annual Report. The supplemental reports collect substantially less information than the comparable modules in the regular annual report and only request information on services and outcomes supported by the supplemental funds.

3. Use of Improved Information Technology and Burden Reduction

OCS collects the CSBG Annual Report through OLDC. OCS created new efficiencies and capabilities for program planning, oversight, and accountability through using technology to collect an automated, web-based form for this information collection. OLDC allows OCS to link information from the CSBG State Plan directly to the State Administrative Module (Module 1) of the CSBG Annual Report.

Additionally, OLDC allows both federal and state staff to access data easily and track the submission, review, and acceptance of CSBG Annual Reports. Overall, OLDC increases the transparency and accountability of the submission and review process. States have used OLDC since 2015, and are accustomed to the system, reducing the amount of burden on states to submit.

To maintain consistency in processes and procedures, OCS utilizes the same OLDC system for grantees to submit their supplemental annual reports. To the extent possible, the format and instructions will be consistent with current forms and online systems.

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

No small businesses or other small entities are involved in this information collection.

6. Consequences of Collecting the Information Less Frequently

This 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 A1). Without this information collection, OCS is unable to account for CSBG funding or meet annual requirements to report to Congress on the use of funds.

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 or supplemental reports 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 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 alerted the public to a request for emergency approval for six months of data collection and provided a sixty-day comment period related to the full request that will be submitted to continue data collection beyond six months. This notice was published on November 19, 2020, Volume 85, pages 73724-73725, and provided a sixty-day period for public comment.

During the 60-day comment period, OCS received 15 comments. The comments were generally the same, and requested that OCS did not request three separate Annual Reports for the following reasons:

- (1) "It does not properly represent the intended and actual ways that CSBG funding is used by CAAs;"

While OCS does understand the concern, from the federal perspective, stewardship, oversight, and reporting, OCS believes that it is important to maintain separate reports. OCS is receiving inquiries specifically about the CARES Supplemental funding and Disaster Supplemental funding. Per the terms and conditions in the Notice of Awards, all grantees were required to track these funds separately for future reporting. This also prepares us for possible future supplemental funding and the potential requirement to report and track the funds and services separately, including the intricacies of the

Paperwork Reduction Act and adapting systems.

- (2) “The reporting approach will unduly burden agencies during a global pandemic without adding useful data demonstrating the specific impact of the Disaster and CARES supplementals;”

OCS considered the burden of separate reporting forms versus one reporting form and the longer affect. Combining all reports into one form that meets the requirement to track the funding and services separately, would require everyone to adapt multiple systems (SmartForms, statewide databases, XMLs, and OLDC), and then readapt their systems again once the funding ends. As the supplemental funding is temporary, OCS believes that maintaining the standard forms is important and results in less administrative burden.

- (3) “Data resulting from this approach will open to easy and harmful misinterpretation that will adversely affect CAAs; and”

OCS believes this prepares the Network for possible future supplemental funding and the potential requirement to report and track the funds and services separately, including the intricacies of the Paperwork Reduction Act and adapting systems. Rather than adversely affecting the Network, OCS believes this shows the Network’s ability to adapt and response to an urgent need.

- (4) The reporting approach does not provide sufficient data points to capture new, emerging services and outcomes across the CAA network.”

The CSBG CARES Supplemental and Disaster Supplemental Annual Reports were created to compliment the CSBG Annual Report. In creating the OCS Supplemental Annual Reports, OCS’ goal was to not veer too far from the original report. In the next two years, OCS will work with CSBG Network to review the CSBG Annual Report to consider additional data points to capture new emerging services in preparation for a new OMB Clearance.

However, in the interim, OCS understands the importance of adding a few additional data points specific to preventing, preparing for, and responding to COVID-19. In communication with the CSBG Network and as a result of the comments, OCS made the following revisions:

- (a) Within Section A of Module 2 of the CSBG Annual Report of the CSBG CARES Supplemental Annual Report, OCS added a narrative question to allow eligible entities to highlight additional usage of funds that were specific to CARES Supplemental funding at the local level.
- (b) For FY2020, OCS will only request Section B of Module 4 of the CSBG Annual Report for both the CSBG CARES Supplemental and CSBG Disaster Supplemental Annual Reports. However, OCS may request additional information

related to Sections A and C for future fiscal years.

(c) Lastly, within Section B of Module 4 of the CSBG Annual Report for CSBG CARES Supplemental only, OCS added the additional data points to allow the states to provide additional CARES specific information:

- a. SRV 3o
- b. SRV 5a (revised to specify vaccinations)
- c. SRV 7p
- d. SRV 7q

9. Explanation of Any Payment or Gift to Respondents

This information collection does not involve any payment or gift to respondents.

10. Assurance of Confidentiality Provided to Respondents

This 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

CSBG Annual Report

Burden estimates for the CSBG Annual Report were updated during the previous review and approval process, based on public input. Respondents 52 grantees and 1,009 sub-grantees which are comprised of state governments, including the District of Columbia and the Commonwealth of Puerto Rico, and U.S. territories; and CSBG eligible entities (Community Action Agencies).

CSBG CARES and CSBG Disaster Supplemental Funding Reports

OCS estimated average time to complete the supplemental reports based on the time to complete the Annual Report. Since the supplemental reports have fewer questions than the regular CSBG Annual Report, the estimated time per response is much lower. The respondents to the supplemental report are the same as to the annual report.

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
CSBG Annual Report	52 Grantees	3	198	30,888	10,296	\$70.10	\$721,749.60
CSBG Annual Report	1,009 Sub-grantees	3	697	2,109,819	703,273	\$47.12	\$33,138,223.76
CSBG CARES Annual Report	52 Grantees	3	107	16,692	5,564	\$70.10	\$390,036.40
CSBG CARES Annual Report	1,009 Sub-grantees	3	493	1,492,311	497,437	\$47.12	\$23,349,231.44
CSBG Disaster Annual Report	15 Grantees	3	95	4,275	1,425	\$70.10	\$99,892.50
CSBG Disaster Annual Report	50 Sub-grantees	3	476	71,400	23,800	\$47.12	\$1,121,456.00
Estimated Annual Burden Total					1,241,795	Estimated Annual Cost Total:	\$58,720,697.20

Explanation for Calculation of Cost Estimate for Regular CSBG Annual Report

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. The grantee respondents are CSBG program managers; their duties generally fall under the [social and community service managers](#) occupation employment category established by the Bureau of Labor Statistics (BLS). For 2019, the most current information available, BLS indicates that \$35.05 is the mean hourly wage. To account for fringe benefits and overhead, OCS multiplied this by two for a total of \$70.10. Using this mean hourly wage, the estimated annualized burden costs for each respondent is \$13,879.80 (198 [Average grantee burden hours] x \$70.10 [mean hourly wage]).

At the sub-grantee level, OCS reviewed the mean hourly wage [for community and social service occupations](#) (\$24.27); [counselors](#) (\$23.46); [social workers](#) (\$29.69); [social and human service assistants](#) (\$17.81); and [miscellaneous community and social service](#)

[specialists](#) (\$22.55). When averaged, the hourly wage for these occupational pay rates is \$23.56. In order to account for fringe benefits and overhead, OCS multiplied the hourly wage by two for a total of \$47.12. Using this mean hourly wage, the estimated annualized burden costs for each respondent is \$32,842.64 (697 [Average sub-grantee burden hours] x \$47.12 [mean hourly wage]).

Explanation for Calculation of Cost Estimate for CSBG CARES and CSBG Disaster Supplemental

For 2019, the most current information available, the CSBG program managers, whose duties generally fall under the [social and community service managers](#) occupation employment category established by the Bureau of Labor Statistics (BLS), had a mean¹ hourly wage of \$35.05. To account for fringe benefits and overhead, OCS multiplied this by two for a total of \$70.10.

For the CSBG CARES Supplemental, using this mean hourly wage, the estimated annualized burden costs for each respondent is \$7,500.70 (107 [Average grantee burden hours] x \$70.10 [mean hourly wage]).

For the CSBG Disaster Supplemental, using this mean hourly wage, the estimated annualized burden costs for each respondent is \$6,659.50 (95 [Average grantee burden hours] x \$70.10 [mean hourly wage]).

At the sub-grantee level, OCS reviewed the mean hourly wage for [community and social service occupations](#) (\$24.27); [counselors](#) (\$23.46); [social workers](#) (\$29.69); [social and human service assistants](#) (\$17.81); and [miscellaneous community and social service specialists](#) (\$22.55). When averaged, the hourly wage for these occupational pay rates is \$23.56. In order to account for fringe benefits and overhead, OCS multiplied the hourly wage by two for a total of \$47.12.

For the CSBG CARES Supplemental, using this mean hourly wage, the estimated annualized burden costs for each respondent is \$23,230.16 (493 [Average sub-grantee burden hours] x \$47.12 [mean hourly wage]).

For the CSBG Disaster Supplemental, using this mean hourly wage, the estimated annualized burden costs for each respondent is \$22,492.12 (476 [Average sub-grantee burden hours] x \$47.12 [mean hourly wage]).

¹ In 2019, the Bureau of Labor Statistics (BLS) updated its reporting format to include both mean and median figures for hourly wage. For the CARES and Disaster Supplemental funding, OCS is using the mean figure, which is consistent with previously reported median figures on hourly wage.

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

In order to calculate the estimated capital cost burden, OCS projected the cost burden estimate in four key areas for both grantees and sub-grantees, by year and by current capacity: (1) start up; (2) operation; (3) upgrades/modifications; and (4) systems training and technical assistance. OCS took into consideration that the costs would start high and then decrease over time, and presented this in a range.

Though this will be the fourth year reporting, based on feedback from grantees, OCS understands that most grantees are still in an implementation phase. The estimated range of cost burden per grantee is \$37,055 - \$130,221, with an average cost per grantee of \$83,638. The estimate range of cost burden per sub-grantee is \$4,125 - \$16,349, with an average cost per grantee of \$10,237. The tables below provide details on the expected reduction of costs over a three-year period.

OCS used the same cost assumptions for the CSBG CARES and CSBG Disaster Supplemental Reports.

Estimated Other Annual Costs to Respondents and Record Keepers

Instrument	Number of Respondents	AVERAGE RANGE annualized burden cost per response*	AVERAGE annualized burden cost per response	AVERAGE burden cost
CSBG Annual Report	52 grantees	\$37,055 - \$130,221	\$83,638	\$4,349,167.33
	1,009 sub-grantees	\$4,125 - \$16,349	\$10,237	\$10,328,964.83

Instrument	Number of Respondents	AVERAGE RANGE annualized burden cost per response*	AVERAGE annualized burden cost per response	AVERAGE burden cost
CSBG CARES Annual Report	52 grantees	\$37,055 - \$130,221	\$83,638	\$4,349,167.33
	1,009 sub-grantees	\$4,125 - \$16,349	\$10,237	\$10,328,964.83

Instrument	Number of Respondents	AVERAGE RANGE annualized burden cost per response*	AVERAGE annualized burden cost per response	AVERAGE burden cost
CSBG Disaster Annual Report	15 grantees	\$37,055 - \$130,221	\$83,638	\$1,254,570.00
	50 sub-grantees	\$4,125 - \$16,349	\$10,237	\$511,850.00

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

CSBG Annual Report		
Year	ESTIMATED RANGE of burden costs per grantee	ESTIMATED RANGE of burden costs per sub-grantee
Year 1	\$42,510 - \$149,393	\$4,732 - \$18,756
Year 2	\$36,134 - \$126,984	\$4,022 - \$15,943
Year 3	\$32,520 - \$114,286	\$3,620 - \$14,348
*AVERAGE RANGE	\$37,055 - \$130,221	\$4,125 - \$16,349

CSBG CARES Supplemental		
Year	ESTIMATED RANGE of burden costs per grantee	ESTIMATED RANGE of burden costs per sub-grantee
Year 1	\$42,510 - \$149,393	\$4,732 - \$18,756
Year 2	\$36,134 - \$126,984	\$4,022 - \$15,943
Year 3	\$32,520 - \$114,286	\$3,620 - \$14,348
*AVERAGE RANGE	\$37,055 - \$130,221	\$4,125 - \$16,349

CSBG Disaster Supplemental		
Year	ESTIMATED RANGE of burden costs per grantee	ESTIMATED RANGE of burden costs per sub-grantee
Year 1	\$42,510 - \$149,393	\$4,732 - \$18,756
Year 2	\$36,134 - \$126,984	\$4,022 - \$15,943
Year 3	\$32,520 - \$114,286	\$3,620 - \$14,348
*AVERAGE RANGE	\$37,055 - \$130,221	\$4,125 - \$16,349

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 at the time of any revision.
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 was used for form development and will be utilized for ongoing updates, 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 related to each report. For the CSBG CARES Supplemental, OCS will be using the same cost assumptions. For the CSBG Disaster Supplemental, estimated federal staff hours and cost associated with Grantee Communication and Training and Report Review and Analysis will be lower because of a smaller number of grantees.

CSBG Annual Report

TASK	Number of Hours	Rate	Total Cost
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
Subtotal:			\$81,180

CSBG CARES Supplemental

TASK	Number of Hours	Rate	Total Cost
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
Subtotal:			\$81,180

CSBG Disaster Supplemental

TASK	Number of Hours	Rate	Total Cost
OLDC Form Development	360	\$66/hour	\$23,760
Grantee Communications and Training	92	\$66/hour	\$6,072
Report Review and Analysis	159	\$66/hour	\$10,494
Subtotal:			\$40,326

The table below furnishes information on the estimated federal contractor costs related to each report. Same cost assumptions are used for all reports.

CSBG Annual Report

TASK	Total Cost
CSBG Data Portal Development IAG	\$259,990
CSBG Data Cooperative Agreement	\$900,000
Subtotal:	\$1,159,990

CSBG CARES Supplemental

TASK	Total Cost
CSBG Data Portal Development IAG	\$259,990
CSBG Data Cooperative Agreement	\$650,000
Subtotal:	\$909,990

CSBG Disaster Supplemental

TASK	Total Cost
CSBG Data Portal Development IAG	\$100,000
CSBG Data Cooperative Agreement	\$0
Subtotal:	\$100,000

Total federal government costs for the regular CSBG grants are \$1,241,170 over the three-year period, or \$413,723 annually. Additional cost for CARES is CSBG grants are \$991,170 over the three-year period, or \$330,390 annually. Additional costs for disaster supplemental CSBG grants are \$140,326 over the three-year period, or \$46,775 annually. Total costs federal costs for the information collection (including regular CSBG, CARES, and Disaster Supplemental reports) is \$2,372,666.

15. Explanation for Program Changes or Adjustments

This request is to extend approval for data collection approved under OMB # 0970-0492. OCS has made minor revisions to reports based on public comment and consultations with stakeholders (see A8 for additional information). The revisions to the reports do not result in any changes to burden estimates.

16. Plans for Tabulation and Publication and Project Time Schedule

As described under item A1, OCS will use the information from the Annual Report and supplemental reports for a required annual report to Congress and is exploring options for making Annual Report information publically available online through a performance management website. OCS received the ACF Authority to Operate (ATO) in December 2020. OCS is currently in process of preparing the website and OCS will launch the website in 2021/2022. During this time, OCS continues to update the CSBG Network on the status of the performance management website. Information from Module 1 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.