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**Comprehensive Community Services Block Grant (CSBG)  
Training and Technical Assistance (T/TA)  
Needs Assessment**

**Formative Data Collections for Program Support**

**0970 – 0531**

**Supporting Statement**

**Part A - Justification**

**May 2022**

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

4<sup>th</sup> Floor, Mary E. Switzer Building  
330 C Street, SW  
Washington, D.C. 20201

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## **A1. Necessity for the Data Collection**

The Office of Community Services (OCS) within Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval for an online survey to capture critical training and technical assistance (T/TA) needs for the Community Services Block Grant (CSBG) Network.

CSBG is a federal block grant administered through OCS. CSBG is a federally funded grant program created by the *Omnibus Reconciliation Act of 1981*. In 1998 the Community Services Block Grant was reauthorized through the *Community Services Block Grant Act, Community Opportunities, Accountability, and Training and Educational Services Act of 1998, also known as the Coats Human Services Reauthorization Act of 1998*, which encompasses the most recent federal reauthorization of CSBG. Periodically, a continuing resolution has to be passed in order to sustain the program.

The CSBG Act (49 U.S.C. § 9901 et. seq.) was created, “To provide assistance to States and local communities, working through a network of community action agencies and other neighborhood-based organizations, for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient...” Additional information regarding the CSBG Act can be found online on the [Community Services Block Grant \(CSBG\) website](#).

OCS distributes the CSBG funds to states and local communities via a network of 1,018 entities known as CSBG-eligible entities. Funds provide services and strategies to low-income individuals and families to address the causes and conditions of poverty and improve the communities in which they live. Services and strategies support education, employment, housing, health, nutrition, income management, and incorporate case management, self-sufficiency, and re-entry programs.

The CSBG Network consists of several types of organizations that administer and/or support services designed to eliminate the causes and conditions of poverty in the United States. These organizations include: 1) State CSBG Agencies that act as the lead agency for purposes of administering CSBG, 2) State Community Action Agency (CAA) Associations that provide T/TA to increase the capacity of local CSBG-eligible entities to carry out the mandate of the CSBG Act and measure results, 3) CSBG-eligible entities that create, coordinate and deliver programs and services to low-income communities, and 4) national CSBG partners that provide T/TA in a variety of areas, including financial management, administrative governance, CSBG Organizational Standards, legal issues, and performance management.

In an effort guide the development and meaningful delivery of T/TA for the CSBG Network, OCS is creating a CSBG T/TA Learning Agenda. The T/TA Learning Agenda will detail the T/TA needs and priorities expressed by the Network and will lead to the development and implementation of cooperative agreements to meet determined T/TA needs and priorities. This

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proposed survey will provide necessary information for the creation and implementation of the T/TA Learning Agenda.

***Legal or Administrative Requirements that Necessitate the Collection***

There are no legal or administrative requirements that necessitate the collection. OCS is undertaking the collection at the discretion of the agency.

**A2. Purpose of Survey and Data Collection Procedures**

***Overview of Purpose and Use***

The purpose of this proposed information collection is to inform OCS’ decision-making around T/TA for the CSBG Network. OCS believes that future T/TA efforts can be made more effective through a Learning Agenda informed by the needs of the Network. While many states and communities have made effective use of CSBG T/TA to improve and disseminate useful service approaches, OCS has identified a need for an enhanced T/TA Learning Agenda to better support needs within the Network. Through an enhanced T/TA Learning Agenda, OCS aims to ensure that T/TA is effective, proactive, continuous, and innovative in support of alleviating the causes and conditions of poverty. The information collection will support OCS’ strategic approach towards achieving excellence in the CSBG T/TA program.

OCS is committed to building a CSBG T/TA Learning Agenda that:

- Ensures the T/TA provided by the federal government and CSBG T/TA providers adequately and effectively targets the needs of the CSBG Network in an ever-changing environment.
- Builds in and maintains a variety of ways to collect and use information from across the CSBG Network about the most pressing needs and priorities.
- Develops knowledge and identifies best practices for results-driven strategies.
- Provides an opportunity to evaluate and demonstrate the impact of T/TA activities individually and as a whole.
- Increases the Network’s ability to demonstrate the impact of the CSBG program for individuals, families, and communities.

This proposed information collection meets the following goals of ACF’s generic clearance for formative data collections for program support (0970-0531):

- Delivery of targeted assistance related to program implementation, the development and refinement of program and grantee processes, and the development and refinement of recordkeeping and communication systems.
- Planning for provision of programmatic T/TA.

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OCS will use the information collected to develop a T/TA Learning Agenda for the CSBG Network. The information is intended for internal use and planning but will inform T/TA resources that will be disseminated to the CSBG Network.

### ***Data Use***

The findings of the CSBG T/TA Needs Assessment will identify T/TA needs and priorities across the CSBG Network. The purpose of the assessment is intended to help ensure:

- a shared understanding of CSBG T/TA needs;
- targeting of resources based on state and local needs and outcomes;
- improved service delivery to the CSBG Network;
- risk mitigation to assure appropriate expenditure of T/TA funds;
- the development of a comprehensive and collaborative CSBG T/TA Learning Agenda; and
- the development and implementation of cooperative agreements to meet T/TA needs and priorities

The OCS staff members are the key audiences for the use of the data collected. Regular communication of the Comprehensive CSBG T/TA Needs Assessment Survey findings with these key audiences will ensure that the T/TA delivered to grantees is high-quality, relevant, effective, and meaningful to CSBG grantees throughout the grant cycle. Information will be used to inform internal planning processes, T/TA resources, and the development of notices of funding opportunity announcements for cooperative agreements between OCS and T/TA providers.

### ***Study Design and Universe of Data Collection Efforts***

#### ***Study design***

OCS will distribute the survey to the CSBG Network by email and respondents will be provided a link to the online survey (SurveyMonkey). Respondents will be asked to provide a response within three weeks. The survey questions are designed to identify key areas of support that will assist the CSBG Network, as a whole, with effectively providing services to the most vulnerable individuals and communities in our country.

#### ***Participants/Respondents***

The CSBG Act requires states to use CSBG funding in part to provide T/TA activities to eligible entities (local private/public non-profit organizations). Respondents to the Comprehensive CSBG T/TA Needs Assessment Survey are within the CSBG Network including, Tribes and Tribal Organizations, state lead agencies, territories, state associations, and eligible entities. To ensure a diversity of input, multiple staff members from organizations can submit responses. Within the Network, there are 1,018 entities, with multiple respondents from each organization, we estimate that the survey will have approximately 3,054 survey participants/respondents. We anticipate no more than 3 respondents from each entity.

#### ***Data Collection Tool***

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This Generic Information Collection (GenIC) includes one survey/questionnaire to collect the CSBG T/TA data (see *Instrument 1: Comprehensive CSBG T/TA Needs Assessment Survey*).

The CSBG T/TA Needs Assessment Data Collection Tool assesses the CSBG Network's T/TA needs in each of the areas below.

1. CSBG – The Basics
2. Data Collection and Analysis
3. Service Models, Strategies, and Partnerships
4. Financial Oversight/Administration
5. Mandatory CSBG Reporting Requirements
6. Monitoring
7. Organizational Capacity
8. Organizational Performance
9. Governance and Tripartite Boards
10. Disaster/Crisis Response and Relief
11. Legal Consultation
12. Workforce Management

#### Analysis and Reporting

OCS will work with subject matter expert contractors to analyze the results of the Comprehensive CSBG T/TA Needs Assessment Survey to determine high priority needs to strengthen national T/TA efforts, develop a CSBG T/TA Learning Agenda that is focused on the collective T/TA needs, and develop relevant notices of funding opportunities for future cooperative agreements between OCS and T/TA providers.

#### **A3. Improved Information Technology to Reduce Burden**

OCS will administer the Comprehensive CSBG T/TA Needs Assessment Survey through SurveyMonkey. Survey Monkey is an online survey development software that easily allows its users to create, administer, and access surveys.

#### **A4. Efforts to Identify Duplication**

The Comprehensive CSBG T/TA Needs Assessment Survey is specific to the CSBG program. There are no other efforts that specifically target and assess grantee T/TA needs.

Annually, in the CSBG State Plan (OMB #0970-0382), states are required to describe the state's plan for delivering CSBG-funded T/TA to eligible entities and in the CSBG Annual Report (OMB #0970-0492), states are required to describe how the State delivered CSBG-funded T/TA to eligible entities. However, these reports are focused on delivering T/TA specifically to eligible entities within their state, whereas the Comprehensive CSBG T/TA Needs Assessment Survey is focused on identifying high priority targeted T/TA needs across the entire Network. In addition, in 2021, an OCS national partner (grantee) distributed a survey; however, national partner's survey did not fulfill the exact need that the Comprehensive CSBG T/TA Needs Assessment Data Survey information collection fulfills. The national partner's survey (1) was only distributed to the CSBG State Associations, and (2) was only focused on T/TA needs related to engaging in innovative practices and high impact work. Comprehensive CSBG T/TA Needs

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Assessment Survey will expand upon the national T/TA partner's analysis of innovative practices while incorporating the responses to the previously mentioned training areas via this data collection tool to give OCS deeper insight into focused critical T/TA needs for the entire CSBG Network.

#### **A5. Involvement of Small Organizations**

This GenIC does not impact small businesses.

#### **A6. Consequences of Less Frequent Data Collection**

This GenIC is not intended to be an annual data collection. The results the Comprehensive CSBG T/TA Needs Assessment Survey will lead to the development of a CSBG T/TA Learning Agenda that will guide the development of CSBG T/TA cooperative agreements. The CSBG T/TA cooperative agreements will each have a three-year project period.

#### **A7. Special Circumstances**

There are no special circumstances for the proposed data collection efforts.

#### **A8. Federal Register Notice and Consultation**

##### ***Federal Register Notice and Comments***

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 the overarching generic clearance for formative information collection. This notice was published on November 3, 2020, (85 FR 69627), and provided a sixty-day period for public comment. During the notice and comment period, no substantive comments were received. A subsequent notice was published on December 28, 2020 (85 FR 84343) and provided a thirty-day period for public comment. During the notice and comment period, no substantive comments were received.

On January 28, 2022, ACF a notice (87 FR 4603) providing a sixty-day period related to an extension request to this umbrella clearance. No comments were received. ACF will submit a request to extend approval and publish an additional notice allowing a thirty-day period for public comment prior to July 31, 2022.

##### ***Consultation with Outside Experts***

No consultations have taken place with experts outside of the project team.

#### **A9. Tokens of Appreciation for Respondents**

No tokens of appreciation for respondents are proposed for this information collection.

#### **A10. Privacy of Respondents**

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Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private to the extent permitted by law.

OCS will request respondents name and work email addresses as a means to follow-up with respondents regarding their individual responses.

The data collected via Survey Monkey ensures that all respondents' information is securely stored in the accredited data centers that adhere to security and technical best practices. The link to the Privacy and Security Policies for Survey Monkey is below:

<https://www.surveymonkey.com/mp/data-security-and-compliance/>

### **A11. Sensitive Questions**

The questions included in the Comprehensive CSBG T/TA Needs Assessment Survey are not sensitive in nature.

### **A12. Estimation of Information Collection Burden**

#### ***Burden Estimates***

As a final stage of developing the Comprehensive CSBG T/TA Needs Assessment Survey, a small group of OCS staff members took the Word format of the survey to assess the amount of time required to complete the survey, ease, and understandability of the survey. It took between 20 minutes to 30 minutes to complete; therefore, our burden estimate is an average of 25 minutes.

Since this is OCS' first comprehensive CSBG T/TA survey and we know that for our T/TA to be effective, it must be relevant, timely, anticipatory of needs, and driven by the CSBG Network, we plan to reach out to the entire Network for input on critical T/TA needs. Within the Network, there are 1,018 entities. With an estimated 50% response rate and two anticipated respondents from each entity, we estimate that the survey will have approximately 1,018 survey participants/respondents.

#### ***Cost Estimates***

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for 11-9151 and wage data from May 2021, which is \$36.92 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$73.84.

<https://www.bls.gov/oes/current/oes119151.htm>

Instrument	Total Number of Respondents	Total Number of Responses Per	Average Burden Hours Per	Total Burden Hours	Average Hourly Wage	Total Annual Cost
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		Respondent	Response			
Comprehensive CSBG T/TA Needs Assessment Data Collection Tool	1,018	1	.42	428	\$73.84	\$31,571.03

**A13. Cost Burden to Respondents or Record Keepers**

There are no additional costs to respondents.

**A14. Estimate of Cost to the Federal Government**

The total cost for the data collection activities under this current request will be \$10,275.12.

Activity	Estimated Cost
Data analysis of CSBG T/TA Survey responses – project team contractor support: 80 hours X \$54.24 X 2 Data Scientists <a href="https://www.bls.gov/oes/current/oes152051.htm">https://www.bls.gov/oes/current/oes152051.htm</a>	\$8,678.40
Development of CSBG T/TA Learning Agenda: 20 hours X \$66.53 (GS14 hourly wage rate)	\$1,330.60
Development and Dissemination of Dear Colleague Letter to provide CSBG T/TA Learning Agenda of T/TA: 4 hours X \$66.53 (GS14 hourly wage rate)	\$266.12
Estimated	\$10,275.12
Total:	

**A15. Change in Burden**

This is for an individual information collection under the umbrella formative generic clearance for program support (0970-0531).

**A16. Plan and Time Schedule for Information Collection, Tabulation and Publication**

Information collected under this GenIC is meant to inform OCS T/TA activities. The information will be incorporated into internal OCS documents for planning purposes will inform T/TA resources that will be disseminated to the CSBG Network.

T/TA Needs Assessment	Timeframe
Finalize and distribute the CSBG Comprehensive T/TA Needs Assessment Data Collection Tool along with a Dear Colleague Letter to the CSBG Network	Summer 2022; Data collection to take place over about three weeks
Analyze the results and submit the Needs Assessment data, disseminate a Dear Colleague Letter to share information resulting from these data collections	Summer 2022
Distribute the CSBG T/TA Learning Agenda to the CSBG	Summer 2022



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T/TA Needs Assessment	Timeframe
Network	
Develop and publish T/TA Notice of Funding Opportunities	Summer/Fall 2022
Implement T/TA cooperative agreements/contracts to provide support to the CSBG Network	Fall 2022

**A17. Reasons Not to Display OMB Expiration Date**

All instruments will display the expiration date for OMB approval.

**A18. Exceptions to Certification for Paperwork Reduction Act Submissions**

No exceptions are necessary for this information collection.