

Community Services Block Grant (CSBG) Program Model Plan Applications

**OMB Information Collection Request
0970 - 0382**

Supporting Statement Part A - Justification

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

SUPPORTING STATEMENT A – JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The collection of the Community Service Block Grant (CSBG) State Plan and the CSBG Eligible Entity Master List 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—...”

The collection of the American Customer Satisfaction Index (ACSI) Survey is optional, but provides the Office of Community Services (OCS) with valuable information to better understand CSBG grantee administration of CSBG.

2. Purpose and Use of the Information Collection

CSBG grantees (states and territories) develop and submit the data in the CSBG State Plan to the OCS Division of Community Assistance (DCA). DCA reviews the CSBG State Plans to determine whether grantees have submitted a complete application to qualify for federal funds in compliance with the CSBG Act. OCS administers the ACSI biennially to CSBG subgrantees (eligible entities) to seek feedback and better understand performance in several areas related to the CSBG grantees administration of CSBG. The results of this survey provide data to the state that can be used in developing future CSBG State Plans and in guiding improvement efforts. The next time OCS will administer this survey is 2023 and participation in the survey is voluntary.

This current request is to extend approval of the current CSBG State Plan with no changes for use during the FY2020 reporting period (due September 2021) and for approval of revisions to implement for use after September 2021. This is necessary to ensure the reporting system is updated with the final revised version in advance of a reporting date.

Revisions to the CSBG State Plan are proposed to further clarify the current questions; and to add three additional questions to seek additional information based on congressional inquiries in the recent years – including how CSBG grantees distribute funds and policies that CSBG grantees have in place for monitoring CSBG subgrantees (known as CSBG eligible entities). The revised and automated CSBG 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. This data collection also includes the

collection of the CSBG Eligible Entity Master List. The CSBG Eligible Entity Master List interacts with the CSBG State Plan to ensure that eligible entities are correctly identified across all forms. Proposed revisions to the Master List include requesting information about the executive director and a website address (if applicable) for each agency listed. There are no proposed revisions to the ACSI.

3. Use of Improved Information Technology and Burden Reduction

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

States have submitted the automated plan through the On-Line Data Collection (OLDC) system for six years. OLDC 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 OLDC 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 CSBG grantees yearly through OLDC. Lastly, OCS is in the process of creating a performance management site, which will include data from the CSBG State Plan to further improve data management and assist CSBG grantees in making data informed decisions.

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 CSBG grantees (CSBG state lead agencies) to receive federal CSBG funds, therefore, OCS would not be able to provide CSBG funding to grantees without this collection. Per the CSBG Act, grantees have the option to submit their CSBG State Plan annually or biennially. The automated plan is built to support this requirement.

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

There are no special circumstances.

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 April 26, 2021, Volume 86, Number 78, page 22057, and provided a sixty-day period for public comment. During the notice and comment period, 1 set of comments from two commenters were received. Specific comments and OCS responses follow.

1. **5.1. CSBG Eligible Entities.** The CSBG Eligible Entity list in the State Plan should include the same fields as in the Master List so states can easily see if they need to make revisions. Also, the process for making revisions is not clear. The note under chart 5.1 of the State Plan states that all revisions should be made in the Master List, but the State Plan document provides for the opportunity for the states to add rows and provide detail on changes to the list. Providing the information twice is unnecessary. Changes should be made only in the Master List.

OCS Response:

OCS reviewed the comment and believes that the question should remain as is, but that OCS needs to provide more training and technical assistance. OCS also reviewed the instructions associated with the question. The instructions only note that the users must update the Master List to revise 5.1. Additionally, the instructions note that states are not able to add rows or edit this information within the CSBG State Plan.

States will continue to only provide the information once within the Master List.

2. **7.9. Remainder/Discretionary Funds:** The chart describing how a state plans to use their remainder/discretionary funds is not clear and unnecessary. While the CSBG Act requires states to provide a “description of how the state intends to use discretionary”, there is no requirement that a state provide the exact dollar amount that they plan to spend on various activities. Dollar amounts outlined in these charts are created prior to final allocation, and therefore provide little utility to states or OCS. To fulfill the requirement of the Act and reduce burden on states, we recommend OCS revise this chart to request states to identify the planned percent of state allocation (up to 10%) to support discretionary activities, identify which of the fund uses their discretionary allocation will support via check boxes with an optional narrative, and eliminate the specific dollar amounts from this chart. Adjusting the chart to be reflective of these changes will help to reduce burden for states and improve quality of the data obtained. Should this type of edit not be possible, OCS could consider specifying that dollar amounts included in this chart are projections only and may be subject to change once a state has its final allocation or as state needs and priorities change.

OCS Response:

OCS reviewed the comment and believes that the question should remain the same. Per, the CSBG Act, Section 676(2)(B) CSBG state lead agencies are required to “to provide to the public an opportunity to comment on the proposed use and distribution of funds”. OCS interprets this as providing the intended use of funds, including the proposed dollar amount for all activities. OCS will continue to provide training and technical assistance.

3. **8.1 Training and Technical Assistance Plan.** The instructions need clarification as to what CSBG funds should be included in this chart. The explanation document states that OCS “revised this question to request information about all trainings supported by CSBG and the state lead agency...”; it is unclear if this includes RPIC funds and the coordination between the activities in that plan and the T/TA described in this section. OCS could clarify by clearly stating this chart is specific to training and technical assistance funded with any funds from the state’s CSBG allocation.

OCS Response:

OCS revised the question to provide more clarity that CSBG state lead agencies should only provide T/TA activities as funded by the CBSG mandatory grant. OCS will continue to provide training and technical assistance.

4. **9.2 State Linkages and Coordination at the Local Level.** While OCS states the intent of the question remains unchanged, we feel the revised language substantially changes the question asked. The original question asks states to describe the linkages and coordination the state intends to create or maintain, while the new question is asking the state to describe how it will encourage partnerships and collaborations. Creating partnerships and collaborations denotes a different level of engagement from both partners than creating linkages and coordinating services. Linkage and coordination are

the terms used within the CSBG Act; linkage and coordination are also the terms used within the CSBG Annual Report. Furthermore, the revised question removes language that specifies states should link and coordinate with antipoverty programs, which a specific assurance within the CSBG Act. To assure alignment of the State Plan with the CSBG Act and the CSBG Annual Report, OCS should use the existing language for this question.

OCS Response:

OCS reviewed the comment and believes that the question should remain the same. In the past several years, CSBG state lead agencies requested that OCS provides more clarity in their interpretation of the CSBG Act. This is OCS' first step in providing additional clarity to the intent of this question, and OCS does not agree that this changes the intent of the question. OCS will continue to provide training and technical assistance to ensure that the question aligns with the intent of the CSBG Act.

5. ***9.3 State Assurance of Eligible Entity Linkages and Coordination.*** OCS' revision added language that requires eligible entities collaborate with public and private sector organizations, however the assurance referenced requires that eligible entities create linkages between government and other social services programs. We recommend OCS use the existing language for this question to align with the CSBG Act.

OCS Response:

OCS reviewed the comment and believes that the question should remain the same. In the past several years, CSBG state lead agencies requested that OCS provides more clarity in their interpretation of the CSBG Act. This is OCS' first step in providing additional clarity to the intent of this question, and OCS does not agree that this changes the intent of the question. OCS will continue to provide training and technical assistance to ensure that the question aligns with the intent of the CSBG Act.

6. ***9.9. Communication with Eligible Entities and the State Community Action Association.*** While we see the value in supporting states to think strategically about their planned communication with their networks, this table is cumbersome, complicated, and creates undue administrative burden for State Offices. This table could be simplified and still gather much of the same information by including a checklist for methods, frequency, and topics with a short narrative description of the communication plan.

OCS Response:

OCS reviewed the comment and adjusted the table to remove the add-a-row function. The current table takes a few minutes to complete and asks for the CSBG state lead agencies' plan to communicate on specific topics as they directly relate to the CSBG State Plan. Additionally, the CSBG state lead agency has the option to select "not applicable" for any of the topics, further reducing the burden. The changes that the commentators are proposing will result in increasing the burden as the state would then have to respond to

multiple questions, and provide a narrative text describing the different topics of communications. OCS will continue to provide training and technical assistance to ensure that the question aligns with the intent of the CSBG Act.

7. **10.13a Federal Investigation Policies.** This is an unnecessary additional question to the Assurance on Federal Investigations. States already certify and provide assurance that they will permit and cooperate with federal investigations; there is no further requirement for state procedures. There is no requirement that states create a policy for how they comply with a federal investigation. In the case a state became subject to a federal investigation, the federal government would be responsible for detailing the procedures and requirements for the state to cooperate with the investigation, which would supersede any state policy. Requiring a state create such a policy is therefore unnecessary and could create unnecessary confusion should a state be subject to a federal review.

Further, it is unclear why any state procedure around permitting, and cooperating would need to be included in state monitoring policies of local CAAs as suggested by this question. If OCS will require such a policy, it would be helpful to define what is meant by a “federal investigation” and how this is different than monitoring of local CAAs.

OCS Response:

OCS reviewed the comment and believes that the question should remain. The question is set up as a yes or no question. The purpose is to inform OCS whether the CSBG state lead agency includes this information in their policies. If the CSBG state lead agency indicates “yes”, the CSBG analyst can look for this information. OCS does not believe this adds additional burden to state, while also providing additional information to OCS.

8. **10.13b Closing Findings Procedures.** The title does not match the question; if OCS will require such a policy, it should be renamed to more appropriately align with the question being asked about procedures to permit and cooperate with federal investigations. Also, this question should be a subset of 10.13a. The North Dakota Department of Commerce, Division of Community Services does not believe this policy is necessary and creates undue and unnecessary burden on states.

OCS Response:

OCS removed this question in response to the comment.

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 28 hours in subsequent years. Given that this is the seventh year that states are submitting through OLDC and there are no changes to the system since the last OMB Clearance, states are familiar with the system, and have data from prior submissions that will pre-populate the CSBG State Plan and CSBG Eligible Entity Master List. Each year, OCS provides optional refresher training, which is also accounted in these hours. The first year also accounts for the states needing to provide new information for the three new questions added to the CSBG State Plan (this information is based on current practices, and OCS does not anticipate that these will cause a large burden to the states to provide a response). The total burden estimate is the average of three years – 31 hours for each of the 56 respondents – a total of 1,736 hours. The average burden estimate does not account for the fact that CSBG grantees have the option to report annually or biennially. Since grantees can (and do) change their reporting frequency each year, it is difficult to provide an exact number of annual responses per respondent. As such, we have estimated one response per grantee per year to ensure we include enough potential burden.

OCS estimates that during the first year, it will take three hours to add the two new data points, and this will reduce to an hour in subsequent years. In subsequent years, states are only expected to update the CSBG Eligible Entity Master List if there is a change to this list and would only have to update those entities that have changed. The burden estimate is the average of the three years, which is 2 hours for each of the 56 respondents, a total of 112 hours.

OCS administers the ACSI survey biennially. Therefore, during this clearance, OCS will administer the ACSI survey one time in 2023. 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.

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 State Plan	56	3	31	5,208	1,736	\$70.10	\$121,693.60

Application for States							
CSBG Eligible Entity Master List	56	3	2	336	112	\$70.10	\$7,851.20
CSBG ACSI Survey of Eligible Entities	1,007	1	.33	332	111	\$70.10	7764.98
Estimated Annual Burden Total:					2,047	Estimated Annual Cost Total:	\$137,309.60

OCS calculated the cost to all respondents using the Bureau of Labor Statistics (BLS) job code for Social and Community Service Managers [11-9151] and wage data from May 2019, which is \$35.05 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$70.10.

<https://www.bls.gov/oes/current/oes211093.htm>

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 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 are now 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 grantees.

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 \$62.66 per hour, federal salary costs each year will be approximately \$17,544.80 (1-hour x \$62.66 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 prior submissions for FY2016 – FY2021 and comments from CSBG grantees. Additional revisions were made based on improvements to the OLDC system. All revisions will result in a more streamlined plan.

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.