Community Services Block Grant (CSBG) Annual Report

OMB Information Collection Request

0970 - 0492

Supporting Statement Part A - Justification

June 2024

**Type of Request:** Revision

Submitted By:

Office of Community Services

Administration for Children and Families

U.S. Department of Health and Human Services

This revision request from the Office of Community Services Administration for Children and Families U.S. Department of Health and Human Services includes the following:

1. Approval of a slightly updated version of the CSBG Annual Report (CSBG Annual Report 2.1) for the FY24 reporting period and as an option for the FY25 reporting period.
2. Addition of a Tribal Annual Report (TAR) and Tribal Short Form (TSF) to come into compliance with the Paperwork Reduction Act.
3. Removal of Supplemental Funding reports that are no longer in use.
4. **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.

Additionally, CSBG is required by Section 3(b) of the Government Performance and Results (GPRA) Modernization Act of 2010 (GPRAMA) to:

“… (1) establish performance goals to define the level of performance to be achieved during the year in which the plan is submitted and the next fiscal year; …

… (6) establish a balanced set of performance indicators to be used in measuring or assessing progress toward each performance goal, including, as appropriate, customer service, efficiency, output, and outcome indicators;

(7) provide a basis for comparing actual program results with the established performance goals…”

OCS and the CSBG Network – CSBG state and territory lead agencies, CSBG direct-funded tribes and tribal organizations, 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.

OCS received the initial approval for the CSBG Annual Report (OMB No. 0970-0492) in January 2017. The information collection request was specific to CSBG funded states and territories.

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.

OCS has made minor clarifying updates to the CSBG Annual Report and is referring to this updated version as the CSBG Annual Report 2.1. OCS is working on further revisions to the Annual Report and a request specific to that update (CSBG Annual Report 3.0) will be submitted once complete (see section A8 for additional information).

OCS is also adding in the **Tribal Annual Report (TAR) and Tribal Short Form (TSF)** under this OMB number**.** These reports are also required by theCSBG Act and GPRAMA. These forms were developed using the revisions of the CSBG Annual Report to provide a comparable reporting schema for directly funded CSBG tribes commensurate with their funding levels in minimize burden while collecting performance data. The collection of the performance outcomes of CSBG tribal grant recipients allows OCS to measure performance by comparing established goals in the CSBG Tribal Plan with actual program results in the CSBG Tribal Annual Report.

1. **Purpose and Use of the Information Collection**

The data provided in the CSBG Annual Report is used at the local, state, tribal, and national levels to monitor and improve performance 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 principles outlined in GPRAMA 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. As the federal agency responsible for administering CSBG, ACF also utilizes the reporting data to respond to congressional budget justification requested and performance measurement at the federal level including recommendations from the Government Accountability Office. Receipt and review of CSBG Annual Report data 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.

Additionally, OCS uses this information to develop the CSBG Report to Congress, which is required to be submitted each year to the [Senate Committee on Health, Education, Labor and Pensions](https://www.help.senate.gov/about/members) and the [Committee on Education and the Workforce](https://edworkforce.house.gov/).

The data collected also informs enhancements at the federal level to demonstrate performance across digital tools to include the CSBG performance management website which supports 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.

At the tribal level, the CSBG Annual Report data enables OCS to measure performance by assessing established goals in the CSBG Tribal Plan with actual program results in a manner that is flexible and supportive of tribal needs.

At the state level, the CSBG Annual Report supports oversight 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 local eligible entity level, the information in the CSBG Annual Report supports agency efforts to set targets and measure progress on individual, family, and community outcomes resulting from services and strategies to address locally-identified community needs.

Combined with information from the CSBG State Plan (OMB #0970-0382), CSBG Tribal Plan (New request currently pending OMB review) 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.
1. **Use of Improved Information Technology and Burden Reduction**

OCS collects the CSBG Annual Report through the ACF Online Data Collection system (OLDC). OCS maintains 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. OCS intends to model the linkage of the CSBG Tribal Plan with the Tribal Annual Report and Tribal Short Form to enhance efficiencies and capabilities for CSBG funded tribal programs.

Additionally, OLDC allows federal, tribal, and state staff to access data 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.

1. **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.

1. **Impact on Small Businesses or Other Small Entities**

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

1. **Consequences of Collecting the Information Less Frequently**

This information collection is required by law 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.

1. **Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

OCS is not currently proposing any changes to the race and ethnicity questions included in the CSBG Annual Report 2.1 but is incorporating updates to implement the new standards outlined in Statistical Policy Directive 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15) into the CSBG Annual Report 3.0, which will be submitted for review following approval of this request. More information about updates will be included in the forthcoming request.

1. **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 22, 2024, (89 FR 29339) and provided a sixty-day period for public comment.

. OCS received 97 submissions of comments that are specific to the Annual Report 3.0. To ensure OCS has time to consider all comments received, the Annual Report 3.0 is not currently being submitted. Once a final proposed version is ready, OCS will submit to OMB with an overview of all comments and OCS responses. At that time, OCS will also publish a notice providing a thirty-day period for public comment specific to the Annual Report 3.0.

**NOTE:** No comments were received regarding Annual Report 2.1, CSBG Tribal Annual Report or Tribal Short Form.

1. **Explanation of Any Payment or Gift to Respondents**

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

1. **Assurance of Confidentiality Provided to Respondents**

This information collection does not require an assurance of confidentiality.

1. **Justification for Sensitive Questions**

This information collection does not include sensitive questions.

1. **Estimates of Annualized Burden Hours and Costs**

*CSBG Annual Reports*

Burden estimates for the CSBG Annual Report were updated during the previous review and approval process, based on public input. Respondents include 56 grant recipients and 1,000 sub-grant recipients which are comprised of state governments, including the District of Columbia, the Commonwealth of Puerto Rico, U.S. territories, and CSBG eligible entities. The Tribal Annual Report respondents include 24 directly funded tribal grant recipients and the Tribal Short Form respondents include 30 directly funded tribal grant recipients.

For Annual Report 2.1, this request shows burden for the following two years. OCS intends to phase in the CSBG Annual Report 3.0 beginning in Fiscal Year 2025 and will submit a request to include that version under this OMB number following approval of this request. At that time, burden estimates will be updated to reflect a three-year request.

| 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 2.1(States) | 56  | 2 | 198 | 22,176 | 11,088 | $80.20 | $889,257.60 |
| CSBG Annual Report 2.1(Eligible Entities) | 1,000  | 2 | 493 | 986,000 | 493,000 | $53.54 | $26,395,220.00 |
| CSBG Annual Report 3.0 Tribal Annual Report (Tribes) | 24  | 2 | 111 | 5,328 | 2,664 | $80.20 | $213,652.8 |
| CSBG Annual Report 3.0 Tribal Short Form (Tribes) | 30  | 2 | 40 | 2,400 | 1,200 | $80.20 | $96,240.00  |
| **Estimated Annual Burden Total** | **507,952** | **Estimated Annual Cost Total:** | **$27,594,370.4** |

*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 grant recipient and sub-grant recipient hourly cost burdens was calculated using wages provided by the Bureau of Labor Statistics. The grant recipient respondents are CSBG program managers; their duties generally fall under the [social and community service managers](https://www.bls.gov/oes/current/oes119151.htm) occupation employment category established by the Bureau of Labor Statistics (BLS). For 2023, the most current information available, BLS indicates that $40.10 is the mean hourly wage. To account for fringe benefits and overhead, OCS multiplied this by two for a total of $80.20.

At the sub-grant recipient level, OCS reviewed the mean hourly wage [for community and social service occupations](https://www.bls.gov/oes/current/oes210000.htm) ($28.36); [counselors](https://www.bls.gov/oes/current/oes211019.htm) ($25.17); [social workers](https://www.bls.gov/oes/current/oes211029.htm) ($33.08); [social and human service assistants](https://www.bls.gov/oes/current/oes211093.htm) ($21.27); and [miscellaneous community and social service specialists](https://www.bls.gov/oes/current/oes211099.htm) ($25.97). When averaged, the hourly wage for these occupational pay rates is $26.77. In order to account for fringe benefits and overhead, OCS multiplied the hourly wage by two for a total of $53.54.

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

To calculate the estimated capital cost burden, OCS projected the cost burden estimate in four key areas for both grant recipients and sub-grant recipients, 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.

The estimated range of cost burden per grant recipient is $37,055 - $130,221, with an average cost per grant recipient of $83,638. The estimate range of cost burden per sub-grant recipient is $4,125 - $16,349, with an average cost per grant recipient of $10,237.

1. **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 for initial development and a slight increase in operations and maintenance costs.
2. **Grant Recipient Communications and Training** – Notifying grant recipients of the reporting requirements, providing training through conference calls, webinars, and in-person, and conducting follow-up with grant recipients.
3. **Report Review and Analysis** – Reviewing submitted reports and working with grant recipients 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.

*CSBG Annual Report*

|  |  |  |  |
| --- | --- | --- | --- |
| **TASK** | **Number of Hours** | **Rate** | **Total Cost** |
| OLDC Form Development | 360 | $66/hour | $23,760 |
| Grant Recipient Communications and Training | 320 | $66/hour | $21,120 |
| Report Review and Analysis | 550 | $66/hour | $36,300 |
| **Subtotal:** | **$81,180** |

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  | $390,000 |
| CSBG Data Cooperative Agreement | $750,000 |
| **Subtotal:** | **$1,140,000** |

Total federal government costs for the regular CSBG grants are $1,221,180 over a three-year period, or $407,060 annually.

1. **Explanation for Program Changes or Adjustments**

This request is to extend approval for data collection approved under OMB # 0970-0492 and introduce the CSBG Tribal Annual Report and Tribal Short Form. OCS has also removed supplemental reports that are no longer in use.

1. **Plans for Tabulation and Publication and Project Time Schedule**

As described under item A1, OCS will use the information from the Annual Report, TAR and TSF for required annual reporting to Congress and makes the Annual Report information publicly available online through a performance management website.

1. **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.

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

There are no exceptions necessary for this information collection.