

# **Community Services Block Grant (CSBG) Model State Plan Applications**

**OMB Information Collection Request  
0970 - 0382**

## **Supporting Statement Part A - Justification**

**July 2024**

**Type of Request: Revision**

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

## **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 grant recipient’s administration of CSBG.

## **2. Purpose and Use of the Information Collection**

CSBG grant recipients (CSBG state and territory lead agencies) 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 CSBG grant recipients submitted a complete application to qualify for federal funds in compliance with the CSBG Act. OCS administers the ACSI biennially to CSBG sub-grant recipients (CSBG-eligible entities) to seek feedback and better understand performance in several areas related to the CSBG grant recipients administration of CSBG. The results of this survey provide data to the CSBG lead agency that can be used in developing future CSBG State Plans and in guiding improved performance efforts. The next time OCS will administer this survey is 2025 and participation in the survey is voluntary.

The automated CSBG State Plan streamlines both the state development and the federal review of the information. In addition, with the 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 and systems.

There are no proposed revisions to the CSBG State Plan, CSBG Eligible Entity List, or ACSI. Burden estimates have been updated to reflect current estimates for number of respondents and the State Plan has minor edits for 508-compliance purposes.

OCS anticipates a subsequent revision to this information collection pending OMB approval of a forthcoming request for revisions to the CSBG Annual Report (OMB No. 0970-0492), which serves as a companion to this information collection.

### **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 grant recipients (state and territory lead agencies), while creating new efficiencies and capabilities for program planning, oversight, and accountability. The automated CSBG State Plan gives CSBG grant recipients 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.

CSBG grant recipients have submitted the automated plan through the On-Line Data Collection (OLDC) system for nine 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 grant recipients 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 grant recipients 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 for CSBG grant recipients to receive federal CSBG funds, therefore, OCS would not be able to provide CSBG funding to CSBG grant recipients without this collection. Per the CSBG Act, grant recipients 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 24, 2024 (89 FR 31207) and provided a sixty-day period for public comment. OCS did not receive any comments on the proposed collection.

**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**

OCS, maintain records in accordance with federal law and ensure privacy to the extent permitted by law.

**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 28 hours to complete the CSBG State Plan. Given that this is the tenth year that CSBG grant recipients are submitting through OLDC and there are no changes to the system since the last OMB review and approval, the respondents are familiar with the system, and have data from prior submissions that will pre-populate the CSBG State Plan and CSBG Eligible Entity List. Each year, OCS provides optional refresher training, which is also accounted in these hours. The average burden estimate does not account for the fact that CSBG grant recipients have the option to report annually or biennially. Since grant recipients 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 grant recipient per year to ensure we include enough potential burden.

Grant recipients are only expected to update the CSBG Eligible Entity List if there is a change to this list and would only have to update those entities that have changed. OCS estimates that it will take 1 hour to make updates to the CSBG Eligible Entity List, as applicable.

OCS administers the ACSI survey biennially. Therefore, during this clearance, OCS will administer the ACSI survey in 2025 and 2027. It is estimated that it will take 20 minutes to complete the survey each year. Based on prior experience, we anticipate about 1,000 respondents over this time period.

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	28	4,704	1,568	\$80.20	\$125,753.60
CSBG Eligible Entity List	56	3	1	168	56	\$80.20	\$4,491.20
CSBG ACSI Survey of Eligible Entities	1,000	2	.15	300	100	\$80.20	\$8,020.00
<b>Estimated Annual Burden Total:</b>					<b>1,724</b>	<b>Estimated Annual Cost Total:</b>	<b>\$138,264.80</b>

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Community Service Managers [11-9151] and wage data from May 2023, which is \$40.10 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$80.20. The estimate of annualized cost to respondents for hour burden is \$80.20 times 100 hours or \$8,020.

[https://www.bls.gov/oes/current/oes\\_stru.htm](https://www.bls.gov/oes/current/oes_stru.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

On average, federal staff takes about one hour to review each automated, streamlined CSBG State Plan. This is due in large part to automated features that will prevent CSBG grant recipients from submitting incomplete plans.

In addition, with the inclusion of performance management information in the 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 CSBG grant recipients. OCS expects federal staff to spend an average of one (1) hour per state plan reviewing performance and accountability elements in the plan and providing feedback to CSBG grant recipients.

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 \$62.35 per hour, federal salary costs each year will be approximately \$6,938.20 (2 hours x \$62.35 x 56 applications).

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

There are no changes to the information requested. Burden estimates have been updated to reflect current estimates for number of respondents and minor edits were made to the State Plan for 508-compliance purposes.

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

Starting in FY24, OCS will publish data from the CSBG State Plans on the CSBG Performance Management website. The CSBG Performance Management website is a password-protected site available to the CSBG Network and stakeholders to view their data. Data will be published to the site within 6 months of the completion of the review. It takes approximately 20 hours to transfer this data to the website. To complete this transfer, the data is downloaded from OLDC to an excel spreadsheet. The website developer then uses that spreadsheet to upload the data into the website. The developer does a review to ensure that data is uploaded correctly.

There are no analytical techniques as the data is uploaded as is.

**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.