

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

**OMB Information Collection Request  
0970 – NEW**

## **Supporting Statement Part A – Justification**

**July 2024**

**Type of Request: New**

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) Model Tribal Plan is required by Section 677(d) of the CSBG Act, 42 U.S.C. § 9911.

“SEC. 677. PAYMENTS TO INDIAN TRIBES. 42 USC 9911....

...(d) PLAN.—In order for an Indian tribe or tribal organization to be eligible for a grant award for a fiscal year under this section, the tribe or organization shall submit to the Secretary a plan for such fiscal year that meets such criteria as the Secretary may prescribe by regulation...”

The Office of Community Services (OCS) oversees CSBG tribal grant recipients and requests the information to fulfill this requirement through the CSBG Model Tribal Plan. The CSBG Model Tribal Plan has been used in previous years but was not submitted for review and approval under the Paperwork Reduction Act (PRA). Approval of this request will put ACF in compliance with the requirements of the PRA when requesting this information<sup>1</sup>.

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

CSBG tribal grant recipients develop and submit the data in the CSBG Model Tribal Plan to the OCS, Division of Community Assistance (DCA). DCA reviews the CSBG Model Tribal Plan to determine whether CSBG tribal grant recipients submitted a complete application to qualify for federal funds in compliance with the CSBG Act.

The CSBG Model Tribal Plan streamlines both the tribal development and the federal review of the information. In addition, with the CSBG Model Tribal Plan, tribal and federal staff will interact with and use the data to improve performance and track results from year-to-year. Specifically, federal staff will review the performance and accountability elements in each CSBG Model Tribal Plan and provide targeted, performance-boosting feedback to CSBG tribal grant recipients.

OCS uses the data submitted for training and technical assistance and for coordination with tribes and tribal organizations. Additionally, the data provides information for the annual congressional report, as well as the CSBG Tribal Annual Report (OMB #0970-0492) submitted by CSBG tribal grant recipients yearly.

## **3. Use of Improved Information Technology and Burden Reduction**

OCS collects the CSBG Model Tribal Plan through a fillable PDF form. Previously, CSBG grant recipients did not use a fillable PDF form, leading to the burden of manually checking

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<sup>1</sup> This violation was reported to the Office of Management and Budget through the data call for the FY 2023 Information Collection Budget.

information for errors and missing requirements. By collecting a fillable PDF form for this information collection, OCS dramatically reduced burden for CSBG tribal grant recipients and federal staff, while creating new efficiencies and capabilities for program planning, oversight, and accountability. The CSBG Model Tribal Plan fillable PDF form gives CSBG tribal grant recipients the option to select preformatted responses with limited-character text boxes and checkboxes, for example.

Tribes and tribal organizations submit the CSBG Model Tribal Plan through the On-Line Data Collection (OLDC) system. OLDC is the system used by Administration for Children and Families (ACF) for collection of tribal plans and other forms, such as the SF-424M. Burden has been reduced substantially by using the CSBG Model Tribal Plan fillable PDF form for the CSBG Model Tribal Plan and due to other OLDC features, such as pre-population.

#### **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 Model Tribal 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 tribes and tribal organizations are affected.

#### **6. Consequences of Collecting the Information Less Frequently**

The CSBG Act requires this information collection for CSBG tribal grant recipients to receive federal CSBG funds, therefore, OCS would not be able to provide CSBG funding to CSBG tribal grant recipients without this collection. Per the CSBG Act, tribal grant recipients have the option to submit their CSBG Model Tribal Plan annually or biennially. The fillable PDF form 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 23, 2024 (89 FR 30379) and provided a sixty-day period for public comment. During the notice and comment period, OCS received no comments on this information collection requested.

**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 DCA maintains records in accordance with federal law and will keep information private 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 10 hours to complete the CSBG Model Tribal Plan. CSBG tribal grant recipients have historically submitted contents of the plan through OLDC, and the respondents are familiar with the system. Each year, OCS provides optional refresher training, which is also accounted in these hours. The average burden estimate is the average of three years – 10 hours for each of the 66 respondents – a total of 660 hours. The average burden estimate does not account for the fact that CSBG tribal grant recipients have the option to report annually or biennially. Since tribal 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.

Information Collection Title	Total Number of Respondents	Average Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Average Annual Burden Hours	Average Hourly Wage	Total Annual Cost
CSBG Model	66	1	10	660	\$74.06	\$48,879.6

Tribal Plan						
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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 \$37.03 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$74.06. The estimate of annualized cost to respondents for hour burden is \$74.06 times 660 hours or \$48,879.6.

[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**

CSBG tribal grant recipients submit a fillable PDF form for the CSBG Model Tribal Plan and it takes federal staff an estimated average of one (1) hour to review a plan, including the time spent following-up with CSBG tribal grant recipients to obtain missing information and discussing questions with supervisors.

OCS expects federal staff to spend an average of one (1) hour per tribal plan reviewing performance and accountability elements in the plan and providing feedback to CSBG tribal grant recipients. In total, OCS expects federal staff will spend an average of two (2) hours on the review process and feedback.

Typically, a federal General Schedule 12 or 13 employee at OCS in Washington, DC reviews each tribal 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 \$8230.20 (2 hours x \$62.35 x 66 applications).

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

This is a new information collection request.

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

The data provides information for the annual congressional report.

**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.