

**Network Partner Engagement to Inform a  
Learning Agenda for the Community Services  
Block Grant (CSBG)**

**Administration for Children and Families  
Generic for Engagement Efforts**

**0970 – 0630**

**Supporting Statement Part A**

**Justification**

**September 2024**

Submitted By:  
Office of Planning, Research, and Evaluation  
Administration for Children and Families  
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## **A1. Necessity for the Data Collection**

The Office of Community Services' (OCS) Community Services Block Grant (CSBG) which is administered by the Division of Community Assistance (DCA), is working to develop a CSBG learning agenda to drive program improvement. As part of the Administration for Children and Families (ACF) Evidence Capacity Support project, the Office of Planning, Research, and Evaluation (OPRE), and its contractor, Mathematica, seek to support DCA in developing a learning agenda by engaging representatives of organizations involved in implementing the CSBG (the "CSBG network") to gather input on priority needs for the network.

### ***Background***

The Presidential Memorandum on *Restoring Trust in Government through Scientific Integrity and Evidence-Based Policy Making*, the *Department of Health and Human Services (HHS) Strategic Plan FY 2022-2026*, as well as the *ACF Evaluation Policy*, discuss community engagement and inclusion in research. Consistent with these guidance documents, and to ensure meaningful involvement with a variety of individuals with diverse experiences and perspectives, ACF conducts engagement activities with constituent groups to inform various efforts, including research and evaluation.

Hearing the perspective of members of the CSBG network who administer CSBG funds and operate CSBG-funded programs is vital to ensure that OCS is responsive to the network's needs and that resources and programming are appropriate, useful, and relevant for audiences.

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

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

## **A2. Purpose of Information Collection and Data Collection Procedures**

### ***Overview of Purpose and Use***

The primary purpose of this information collection is to support DCA's efforts to develop a learning agenda by engaging CSBG network members to gather input and feedback on priority needs for the network. ACF will use this information to develop and refine a learning agenda that will ultimately drive program improvement. The intended uses of the information include:

- Building a shared understanding of how CSBG activities support OCS/DCA's learning goals.
- Creating a conceptual model to document the activities of the CSBG network that lead to the fulfillment of DCA's vision for CSBG.
- Understanding the interactions and collaboration between DCA and other organizations in the CSBG network.

This proposed information collection meets the goals and uses of the ACF generic clearance for engagement efforts (0970-0630):

- Gathering information from individuals with diverse experiences and perspectives to inform ACF policies and programs.

- Making opportunities for ongoing, two-way collaborative and actionable communications between ACF and its state, local and/or Tribal partners, program participants, communities served or affected by ACF programs, and or others experienced with or interested in ACF programs or similar programs.
- Informing program improvements.
- Informing program planning.

### **Overview of Information Collections**

<b>Information Collection Title</b>	<b>Respondent, Content, Purpose of Collection</b>	<b>Mode and Duration</b>
CSBG Network Partner Discussion Protocol	<p><b>Respondents:</b> Staff representatives from organizations in the CSBG network such as staff from state or tribal administrators, state and regional technical assistance providers, eligible entity representatives (such as staff and tripartite board members), and national organizations.</p> <p><b>Content:</b> Questions related to feedback on a vision for how CSBG network partners should work together to achieve positive outcomes related to legislative goals; how network members' work together to achieve the CSBG vision; what makes it easy or difficult to achieve CSBG's vision; and supports that CSBG network members would like to receive to help them achieve the CSBG vision.</p> <p><b>Purpose:</b> To support DCA in developing a learning agenda by engaging CSBG network partners to gather input on priority needs for the network.</p>	<p><b>Mode:</b> Videoconference call</p> <p><b>Duration:</b> 90 minutes/discussion</p>

### **Processes for Information Collection**

The study team, including Mathematica, OPRE and DCA, will work together to identify priority groups and recruitment strategies for the information collection. The study team will conduct discussions with staff from the following six categories of CSBG network members (up to 6 respondents from each category, or a maximum of 36 respondents):

1. State associations that have cooperative agreements with OCS to provide technical assistance, training, and other services in their states and regions
2. State CSBG lead agencies, government offices funded by the CSBG that distribute funding to eligible entities at the community level and monitor and support eligible entities.
3. Staff of community level agencies that deliver direct services using CSBG and other funds, known as "eligible entities."
4. Members of tripartite boards that govern eligible entities' use of CSBG funds
5. Representatives from tribal CSBG lead agencies and/or organizations
6. National organizations that have cooperative agreements with OCS (the National Community Action Partnership [NCAP], the National Association for State Community Services Programs [NASCSPP], and Community Action Program Legal Services [CAPLAW])

While the study team would like to gather perspectives from a range of CSBG network members, the study team is not attempting to identify a representative sample. Recruitment strategies might vary for different groups. For example, to identify state- or local-level respondents (groups 1-4), the study team may work with ACF staff and existing communication channels (such as network newsletters and email lists) to purposively identify a group of respondents to participate in the individual or small group discussions. The study team might conduct direct outreach to identify representatives from tribal CSBG lead agencies or of national organizations (groups 5 and 6). In recruiting groups 1-5, the study team will seek diversity in terms of geography and primary service population. Geographic and primary service priority diversity is not applicable to group 6 because the organizations are national in scope and represent different constituents.

Individual and small group discussions will be conducted virtually and will be scheduled at times that are convenient to identified respondents. The study team will conduct separate discussions for each priority group.

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

Participating in this information collection will not require any in-person activities or printing of any materials. Individual and small group discussions will be conducted virtually and will be scheduled at times that are convenient for identified respondents. The study team will use information technology as appropriate to reduce the burden on respondents. Mathematica will conduct the discussions via a videoconferencing platform that can be accessed on a computer, phone, or tablet (such as Zoom or WebEx). When we schedule a discussion, we will email respondent(s) an overview of the discussion topics so they can prepare ahead of time.

Moderators will take notes during each individual and small group discussion. We will obtain participant consent to record the individual or small group discussions to ensure moderators can augment or review their notes as needed. In addition, we will obtain participant consent to revisit the information collected during the individual or small group discussion for secondary analysis at a future date. This will reduce burden on respondents in the future.

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

The proposed individual and small group discussions do not duplicate other data collection efforts. The information requested through the individual and small group discussions is not available through other existing data sources.

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

Most eligible entities are small, private, non-profit organizations. The study team will minimize the burden on them such as by scheduling data collection at times convenient for respondents and not involving multiple staff or board members from a single eligible entity.

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

This is a one-time data collection.

## **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 this information collection request for a new umbrella generic clearance. The notice was published on December 11, 2023, (88 FR 85890), and provided a sixty-day period for public comment. ACF did not receive any comments on the first notice. A second notice was published, allowing a thirty-day period for public comment (89 FR 12352), in conjunction with submission of the request to OMB. ACF did not receive any comments on the second notice.

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

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

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

It is extremely important to provide those with lived experience with equitable compensation or tokens of appreciation for participation. As noted in a 2022 report by the HHS Office of the Assistant Secretary for Planning and Evaluation, this “helps ensure a diverse population with varied views can participate.”<sup>1</sup> As such, we plan to provide honoraria to members of tripartite boards, as described in section A13.

## **A10. Privacy of Respondents**

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, that their information will be kept private to the extent permitted by law, and that any feedback they provide will not affect or influence the funding their organizations receive in any way.

## **A11. Sensitive Questions**

The proposed information collection does not request any sensitive information.

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

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<sup>1</sup> U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. “Recruiting Individuals with Lived Experience,” by Jasmine Forde, Sonia Alves, Lauren Amos, Ryan Ruggiero, Annalisa Matri, Kate Bradley, Nkemdira Wheatley, Tonyka McKinney, Dana Jean-Baptiste, Jeremiah Donier, Madison Sandoval-Lunn, Wilnisha Sutton, Roger De Leon, Kataney Prior, Laura Erickson, Amanda Benton, and the HHS staff peer learning community on equitably engaging people with lived experience. Washington, District of Columbia: 2022. <https://aspe.hhs.gov/reports/recruiting-individuals-lived-experience>

### **Burden Estimates**

The study team plans to conduct individual or small group discussions with up to 36 respondents. Respondents could include staff from state or tribal administrators, state and regional technical assistance providers, eligible entity representatives (such as staff and tripartite board members), and national organizations. The study team plans to speak to approximately 6 respondents from each group. To ensure a diversity of perspectives, respondents will vary in terms of geography and primary service population. Respondents will be asked to participate in one individual or small group discussion that is estimated to take approximately 90 minutes to complete.

### **Cost Estimates**

The estimated annual cost for respondents is shown in the table below. 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](https://www.bls.gov/oes/current/oes_stru.htm) 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.

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

Instrument	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Average Hourly Wage	Total Annual Cost
Instrument 1: CSBG Network Partner Discussion Protocol	36	1	1.5	54	\$80.20	\$4,330. 80

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

Directly engaging the communities ACF serves and including these individuals in ACF research is in line with the following priorities of the current Administration and HHS:

- Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (EO 13985)
- Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government
- ASPE's Methods and Emerging Strategies to Engage People with Lived Experience (2021)
- ASPE's Recruiting Individuals with Lived Experience (2022)

Consistent with the guidance documents referenced, we propose to offer **members of tripartite boards** an honorarium for their time spent providing their expertise and experience. Specifically, we propose to offer \$60 honoraria for participation in one discussion to ensure a diverse representation of participants across the country. This is equal to 1.5 hours of time at the average wage rate for Social and Community Service Managers, as used to calculate the cost estimate for burden. Tripartite board members are volunteers, prohibited by law from receiving a salary or other compensation for board participation.<sup>2</sup>

<sup>2</sup> CSBG IM #82: Tripartite Boards. <https://www.acf.hhs.gov/ocs/policy-guidance/csbg-im-82-tripartite-boards>

Other respondents will not receive honoraria due to their roles within the CSBG network.

Equitable compensation is in line with leading practices for ethical engagement of those with lived expertise and advancing equity for populations who have been historically underserved. Providing equitable compensation recognizes the value of the time provided by participants, helps to remove barriers to participation, and affirms that the contributions from those with lived experience are as valuable as those from other experts.

As noted in the 2022 report by ASPE this “helps ensure a diverse population with varied views can participate.”<sup>3</sup> Additionally, a 2021 brief by ASPE says that “Providing [those with lived experience] with compensation commensurate with the rates that other experts—i.e., experts engaged based on their expertise as practitioners or researchers, rather than lived experience—receive helped recognize the valuable and unique expertise that people with lived experience lend, which promoted meaningful engagement.” The report goes on to specify that not doing so could result in “unintended consequences...when lived experience engagements have scarce resources and experts are undercompensated, which can undermine, disregard, and/or marginalize people with lived experience.”<sup>4</sup>

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

The total cost for the data collection activities under this current request, including all related qualitative analysis and dissemination, will be \$45,726.00.

#### **A15. Change in Burden**

This is for an individual information collection under the umbrella generic clearance for ACF engagement activities (0970-0630).

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

Once the information collection and its accompanying analysis is complete, the study team will develop an internal memo summarizing the discussions and a public-facing brief for the OPRE website that describes the CSBG learning agenda. This information collection effort will inform the findings and takeaways included in the public brief. The primary audience for the brief will be members of the CSBG network, including practitioners and eligible entities. The table below provides outlines the plan and time schedule for information collection, analysis, and dissemination.

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<sup>3</sup>U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. “Recruiting Individuals with Lived Experience,” by Jasmine Forde, Sonia Alves, Lauren Amos, Ryan Ruggiero, Annalisa Mastri, Kate Bradley, Nkemdirli Wheatley, Tonyka McKinney, Dana Jean-Baptiste, Jeremiah Donier, Madison Sandoval-Lunn, Wilnisha Sutton, Roger De Leon, Kataney Prior, Laura Erickson, Amanda Benton, and the HHS staff peer learning community on equitably engaging people with lived experience. Washington, District of Columbia: 2022. <https://aspe.hhs.gov/reports/recruiting-individuals-lived-experience>.

<sup>4</sup>U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. “Methods and Emerging Strategies to Engage People with Lived Experience. Office of the Assistant Secretary for Planning and Evaluation,” by Syreeta Skelton-Wilson, Madison Sandoval-Lunn, Xiaodong Zhang, Francesca Stern, and Jessica Kendall. Washington, District of Columbia: 2021. <https://aspe.hhs.gov/reports/lived-experience-brief>.

	2024												2025				
	Q2			Q3			Q4			Q1			Q2			Q3	
	M a y	J u n	J u l	A u g	S e p	O c t	N o v	D e c	J a n	F e b	M a r	A p r	M a y	J u n	J u l		
Protocol development																	
OMB submission and clearance																	
Conduct individual and small group discussions and analysis																	
Develop brief																	

#### 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.

#### Attachments

- Instrument 1- CSBG Network Partner Discussion Protocol