Office of Community Services (OCS) Community Economic Development (CED) Standard Reporting Format

OMB Information Collection Request 0970 – 0386

Supporting Statement Part A - Justification

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Type of Request: Revision

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

Summary

The Office of Community Services (OCS) currently uses a standardized semi-annual reporting format, implemented in 2011 and most recently renewed in 2022 (approved by the Office of Management and Budget (OMB) - OMB No.: 0970-0386). Grant recipients of the Community Economic Development (CED) program are required to use this reporting format, called the Performance Progress Report (PPR), to submit performance data twice a year. OCS uses this data to develop comprehensive performance snapshots on each CED grant, as well as to track program performance over time and to conduct cohort analyses. These reports are also used to inform annual reports to Congress on each project's performance. OCS' intent is to obtain approval to continue the use of the PPR for collecting performance data twice a year from all CED grant recipients, and to begin collecting a subset of items in alternate quarters for new grant recipients.

The PPR forms collect both quantitative and qualitative data. The quantitative data elements deal with program outputs and outcomes, while the qualitative questions provide space for grant recipients to discuss their successes and challenges, as well as changes to their grant that might not be captured in the quantitative section.

By requiring grant recipients to report on a consistent set of data elements on a regular basis, OCS improves its understanding of grant recipient success, strengthens its understanding and knowledge of each grant recipient's progress, and ultimately enhances the efficacy and effectiveness of CED grant dollars. Overall, the standardized reporting format increases the quality and clarity of the data collected by OCS, while providing a singular, clear data collection tool for grant recipients.

There are no proposed changes to the PPR form, but OCS is requesting to change the frequency in which the reports are submitted. OCS proposes to introduce quarterly reporting for a subset of items to facilitate more frequent monitoring and timely provision of training and technical assistance for grant recipients awarded in fiscal year 2025 and later. Under this request, OCS seeks approval to continue collecting the CED PPR form from all active grant recipients covering activities through the second and fourth quarters of each project year. Quarterly reporters will also complete a subset of items from the CED PPR, collectively referred to as the CED PPR Short Form. This subset of items covers project activities carried out during the first and third quarters of each year.

1. Circumstances Making the Collection of Information Necessary

One of the ongoing priorities at the Office of Community Services (OCS) is to improve performance and accountability. Monitoring the Community Economic Development (CED) program closely in order to better measure success and to understand and replicate the programs and projects that excel has been and continues to be a priority for OCS. OCS works in partnership with states, communities, and other agencies to provide a range of human and economic development services and activities, which ameliorate the causes and characteristics of poverty and otherwise assist persons in need. OCS continues to have great success in the realm of poverty reduction and community development. However, measuring that success in a systematic way has not always been easy.

The Performance Progress Report (PPR) is a critical part of the evaluation strategy for the CED program and allows OCS to continue to collect program data that supports a performance-based environment that emphasizes accountability and achieving results.

The legislative requirement for the CED program is in Title IV of the Community Opportunities, Accountability, and Training and Educational Services Act (COATS Human Services Reauthorization Act) of Oct. 27, 1998, Pub. L. 105-285, section 680(b) as amended:

"The Secretary shall require all activities receiving assistance under this section to be evaluated for their effectiveness. Funding for such evaluations shall be provided as a stated percentage of the assistance or through a separate grant awarded by the Secretary specifically for the purpose of evaluation of a particular activity or group of activities."

Adoption of the PPR in 2011 ensured that all grant recipients provide the relevant data needed in order to comply with their grant requirements through their semi-annual PPR. The current PPR (OMB Control Number 0970-0386) used by CED grant recipients was approved in 2011, and was renewed in 2014, 2017, 2020, and 2022 (with minor updates). This revision increases the frequency of collection to quarterly for a subset of items so that grant recipients can provide narrative updates on project progress in the first and third quarter of the federal fiscal year. The standardized reporting format ensures accurate program data collection, and the PPR clarifies the data elements and time periods involved in each data collection effort. OCS uses this data to develop comprehensive performance snapshots on the programs, as well as to track program performance over time and to conduct cohort analyses. The more frequent narrative updates on project progress support OCS in monitoring project progress and providing timely training and technical assistance to address project delays and challenges.

2. Purpose and Use of the Information Collection

The primary purpose of the PPR forms is to collect data in a uniform and systematic manner for a CED discretionary grant program. The reporting format gathers uniform program performance data from each grant recipient and ultimately informs reporting on program-level outputs and

outcomes. OCS utilizes an online reporting system that automatically aggregates grant recipient data and provides the response rates necessary to execute comprehensive snapshot, cohort, and longitudinal analyses of program outcomes. This allows for improved monitoring and evaluation of the CED program.

The PPR is categorized by the following programmatic goals:

- To create new businesses to employ low-income individuals
- To expand existing businesses to employ low-income individuals
- To create positions to employ all individuals (low-income and non-low-income)
- To create positions to employ low-income individuals
- To create full-time positions with benefits for low-income individuals
- To prepare low-income individuals for employment
- To employ low-income individuals in positions created
- To create full-time positions for low-income individuals with opportunity for advancement
- To help low-income individuals retain new jobs
- To leverage additional funds to increase project success

Each programmatic goal contains a set of associated questions to track program outputs and, where appropriate, outcome measures. In most cases, outcomes are measured by the retention of an output for either six or 12 months. Data obtained through the PPR is currently used and will continue to be used for multiple purposes to support CED program monitoring and evaluation.

Annual Report to Congress. By measuring program outcomes, OCS is able to analyze grant recipient performance and demonstrate the program's success in the Annual Report to Congress. The report provides Congress with a snapshot of the performance of CED grant projects that were awarded, in progress, and completed in a given year. OCS uses data obtained through the PPR to present grant recipient performance on key indicators, such as number of businesses created or expanded, number of jobs created, or amount of funds leveraged, in a given year.

Technical Assistance. OCS uses the data obtained through the PPR to identify grant recipients in need of technical assistance based on individual grant recipient outcomes. This allows OCS to better allocate and manage limited technical assistance resources and funds.

Project Monitoring Dashboards. OCS develops monitoring tools and dashboards that incorporate data from the PPR. Such tools provide high-level program snapshots, help OCS staff and leadership monitor project progress, and allow for early identification of warning signs and grant recipient challenges so they can be reviewed and addressed quickly.

3. Use of Improved Information Technology and Burden Reduction

Grant recipients currently submit data for the PPR format through an online reporting system.

The system reduces the burden on grant recipients by establishing clear reporting and data collection expectations and ensuring that all grant recipients provide the relevant data needed in order to comply with their grant requirements. The system can be accessed by grant recipients from anywhere with an internet connection, and it supports a streamlined data submission and revision process.

4. Efforts to Identify Duplication and Use of Similar Information

No similar data are available from other studies because this evaluation is specific to the CED discretionary grant program and its grant recipients. The current reporting format condenses the data collected from grant recipients into one instrument, clarifies the data elements requested from grant recipients, and sets specific guidelines for data collection. Ultimately, it provides a detailed and accurate picture of how the grant recipients are implementing and performing programs.

5. Impact on Small Businesses or Other Small Entities

Many CED grant recipients are small entities. The PPR forms have been designed to ensure that the information being requested is held to the absolute minimum required to obtain accurate performance data. In addition, the reporting format establishes clear expectations for data collection and reporting — potentially reducing the burden for grant recipients that were collecting data that was not being used by OCS, or who were surprised by data elements requested and had to piece together information from varied sources. Additionally, grant recipients are now familiar with these reporting requirements and the system, which they have been using to submit their semi-annual PPRs since 2011.

6. Consequences of Collecting the Information Less Frequently

Respondents are currently required to submit the PPR forms twice a year. Consistent and timely reporting is required in order to track grant recipients' progress over the course of their grants, which last three, four, or five years. It is also required for tracking the progress of annual cohorts of grant recipients.

Regular semi-annual reporting is the current reporting requirement for the grant recipients and allows OCS staff to identify grant recipients in need of assistance, and to respond to those needs in time to keep the projects on track to meet their timelines and goals. Reducing the reporting requirement to an annual basis would diminish the opportunity for OCS staff to manage their CED grant portfolios and help under-performing grant recipients. OCS would only become aware of program challenges at the end of the fiscal year, which in many cases represents one-third of a grant recipient's grant period. Additionally, the data collected in the semi-annual reports is included in annual reports to Congress.

The proposed quarterly reporting for grants awarded in FY 2025 and later will also allow OCS to collect more detailed and regular information from grant recipients on a subset of items from the CED PPR, collectively referred to as the CED PPR Short Form. The short form provides OCS the information necessary for effective program oversight and monitoring and reduces burden for the interim quarterly reports. The regularity of reporting submission for grant recipients awarded prior to FY 2025 will remain unchanged.

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

This data collection fully complies with the guidelines of 5 CFR 1320.5.

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 August 29, 2025 (90 FR 42250) and provided a sixty-day period for public comment. During the notice and comment period, OCS received one non-substantive comment and no substantive comments.

9. Explanation of Any Payment or Gift to Respondents

The respondents are grant recipients and will not require an additional payment or gift.

10. Assurance of Confidentiality Provided to Respondents

The grant recipient data collected from the CED PPR forms will not be treated in a confidential manner. The topics focus on the outputs and outcomes of programs funded with Federal dollars. There are no questions of an inherently sensitive nature in the questionnaire. OCS informs respondents about potential uses of information and inform that that information will be kept private to the extent permitted by law, as necessary.

11. Justification for Sensitive Questions

There are no questions of an inherently sensitive nature included in the PPR forms.

12. Estimates of Annualized Burden Hours and Costs

The estimated burden is only expected to increase from the current version for grant recipients awarded funds in FY 2025 and later. OCS anticipates including quarterly reporting requirements will only increase the burden for half of active grant recipients. The PPR is estimated to result in a total of 237 annual burden hours for semi-annual reporting and 48 hours for quarterly reporting. The job code used for estimating total annual cost is occupation code: 11-9151, Social and Community Service Managers. Using wage data from May 2024, average hourly wage is \$ \$41.39 https://www.bls.gov/oes/current/oes119151.htm. To account for fringe benefits and overhead, we multiplied this by two (\$82.78).

Information Collection Title	Total Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
OCS CED Standard Reporting Format	79	2	1.5	237	\$82.78	\$19,618.86
OCS CED PPR Short Form	48	2	.5	48	\$82.78	\$3,973.44
Total Annual Burden and Costs:				285	-	\$23,592.30

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

Respondents are not subject to capital and start-up costs. Any additional cost should be marginal.

14. Annualized Cost to the Federal Government

The estimated annualized cost to federal government is \$28,500. CED program specialists and federal contractors spend an average of 1.5 hour per response for providing reporting assistance, reviewing and approving reports, and analyzing data. Given 79 respondents with 2 responses per respondent, the estimated annual burden hours are 237. Given 48 respondents with 2 responses per respondent, the estimated annual burden hours are an additional 48. This comes to a total of 285 annual burden hours. The average wage is \$50 per hour from estimating federal grants management staff at the GS-12 and GS-13 levels. To account for fringe benefits and overhead, we multiplied this by two (\$100).

The renewal of these forms will require minimal additional time or costs to the Federal Government as this reporting format is already underway, and this will require a low additional level of effort.

15. Explanation for Program Changes or Adjustments

All questions on the current PPR will remain the same and estimated time per response has not changed. Overall burden estimates reflect the current number of grantees, which has changed since the previous approval.

To facilitate more frequent monitoring and timely provision of training and technical assistance, OCS proposes to introduce quarterly reporting for grant recipients awarded in fiscal year 2025 and later. Under this request, OCS seeks approval to continue collecting the CED PPR form from all active grant recipients covering activities through the second and fourth quarters of each project year. Quarterly reporters will also complete a subset of items from the CED PPR, collectively referred to as the CED PPR Short Form. This subset of items covers project activities carried out during the first and third quarters of each year. The short form provides OCS the information necessary for effective program oversight and monitoring and reduces burden for the interim quarterly reports.

16. Plans for Tabulation and Publication and Project Time Schedule

PPR forms are submitted by grant recipients through an online system. Grant recipients are required to submit the PPR at the end of April and October, during each year of their grant. For the semi-annual reporting period of September 30th-March 31st each year, the system is open from April 1st-30th for grant recipients to submit PPRs. For the semi-annual reporting period of April 1st-September 29th each year, the system is open from October 1st-31st for grant recipients to submit PPRs. Each PPR submission will be reviewed and used for data analysis for overall program reports as well as individual grant recipient monitoring reports throughout the year.

This request revises the burden estimates to reflect new reporting requirements for quarterly reporting. While the core CED PPR form remains unchanged and will still be submitted semi-annually, new awardees must now report quarterly. In alternate quarters (Q1 and Q3), grant recipients awarded in FY 2025 or later will complete a shorter version of the form with narrative updates only.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

The OMB Control Number and expiration date will display on the bottom right corner of each page of the PPR forms.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

OCS is not seeking exception to certification for the Paperwork Reduction Act Submission for this data collection.