Community Services Block Grant (CSBG) Annual Report

OMB Information Collection Request
0970 - 0492

Supporting Statement Part A - Justification

October 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 a significantly revised version of the CSBG Annual Report (CSBG Annual Report 3.0). No changes are proposed to the other information collections currently approved under this OMB number.

1. 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.

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.

OCS recently revised the CSBG Annual Report and planned to submit a slightly revised version to continue current year reporting (Annual Report 2.0), a significantly revised version to reduce burden and streamline data collection (Annual Report 3.0), and two Tribal versions. The Tribal Annual Report (TAR) and Tribal Short Form (TSF**)** are also required by the CSBG 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

On August 8, 2024, the Office of Management and Budget (OMB) approved the Annual Report 2.0, CSBG Tribal Annual Report, CSBG Tribal Short Form for three years.

Due to the substantial number of comments received on Annual Report 3.0, OCS submitted the other versions while taking the time to review and consider all comments with the intention of submitting a final version when ready.

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.

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

The data provided in the CSBG Annual Report is used at the local, state, territory, 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 requests 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 and the Committee on Education and the Workforce.

The data collected also informs enhancements at the federal level to demonstrate performance across digital tools including OCS Service Finder application, CSBG data dashboards, OCS Disaster Flexibilities Hub, OCS Annual Report, and 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 (OMB #0970-0635) and other information from federal monitoring and oversight, the Annual Reports from states, tribes, and territories 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, tribe, and territories 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.

3. Use of Improved Information Technology and Burden Reduction

OCS currently 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.

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.

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 the purpose of collecting required CSBG Annual Report information.

5. Impact on Small Businesses or Other Small Entities

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

6. Consequences of Collecting the Information Less Frequently

This information collection is required by law for states, tribes, territories, 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.

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

OCS 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 OCS is requesting an exemption from the required collection of detailed race and ethnicity data due to the extensive burden it would place on the local agencies, state, tribal, and territorial agencies to update data collection systems to collect the data. OCS will explore options to potentially update to the detailed categories by March 2029. This exploration will be completed during ACF's efforts to implement Agency Action Plans.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

The OCS CSBG program sought public comments on the proposed revisions to the CSBG Annual Report. The notice for this information collection activity was published in the Federal Register on April 22, 2024 (89 FR 29339). On the same day, OCS also published materials for the public (to include the CSBG network) to review and provide comment, including the proposed revised Annual Report (CSBG Annual Report 3.0), other related revisions (Annual Report 2.1, CSBG Tribal Annual Report, and Annual Report 3.0 Tribal Short Form) and supplemental materials in a Dear Colleague Letter (ACF-OCS-CSBG-DCL-24-09). During the 60-day comment period, the public was invited to attend a meeting to see a review of the proposed changes to Annual Report 3.0 and to comment on the revised Annual Report and related materials in written public comments in response to the Federal Register Notice.

In total, OCS received 223 responses during the 60-day comment period. These responses included 97 written responses to the Federal Register Notice and 126 responses during listening sessions. Listening session comments included 84 poll responses, 36 verbal responses, and 6 substantive chat responses.

The 223 responses yielded 1,799 unique comments, including 1,464 unique comments in response to the Federal Register Notice and 335 unique comments in the listening sessions. Most comments came from eligible entities, who represented about 10 percent of all CSBG-funded eligible entities. Eligible entities, state administrators, state associations, and regional performance and innovation consortium (RPICs) submitted comments through polls, verbal, and written modes. Other organizations, such as national membership organizations and third-party system vendors, submitted comments primarily as written comments through the Federal Register Notice. Eligible entities made up less than 50 percent of written comments, but the majority of the poll and verbal comments during listening sessions. About thirty percent of state administrators and state associations provided comments. A full list of comments received, OCS disposition, and rationale is provided in Attachment A.

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

This information collection does not require an assurance of confidentiality.

11. Justification for Sensitive Questions

This information collection does not include sensitive questions.

12. Estimates of Annualized Burden Hours and Costs

CSBG Annual Report

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.

OCS intends to establish a phased implementation for Annual Report 3.0. For the first full reporting year post-OMB approval, grant recipients would have the option to select from either Annual Report 2.1 or 3.0 to report annual report data and the subsequent reporting year would require mandatory use of the Annual Report 3.0 form.

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 3.0 (States)	56	2	124	13,888	4,629	$80.20	$556,908.80
CSBG Annual Report 3.0 (Eligible Entities)	1,000	2	426	852,000	284,000	$53.54	$22,808,040.00
CSBG Annual Report 2.1(States)	56	1	198	11,088	3,696	$80.20	$296,419.20

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 (Eligible Entities)	1,000	1	493	493,000	164,333	$53.54	$8,798,404.88
CSBG Annual Report 3.0 Tribal Annual Report (Tribes)	24	3	111	7,992	2,664	$80.20	$213,652.80
CSBG Annual Report 3.0 Tribal Short Form (Tribes)	30	3	40	3,600	1,200	$80.20	$96,240.00
Estimated Annual Burden Total					**460,522**	**Estimated Annual Cost Total:**	**$32,769,665.68**

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 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 ($28.36); counselors ($25.17); social workers ($33.08); social and human service assistants ($21.27); and miscellaneous community and social service specialists ($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.

13. 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.

14. 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.

15. Explanation for Program Changes or Adjustments

This request is to approve the revision under the current approved data collection under OMB # 0970-0492, which includes the addition of a revised Annual Report and adjusts the burden estimates to reflect a phased in approach to implement the Annual Report 3.0.

16. Plans for Tabulation and Publication and Project Time Schedule

As described under item A1, OCS will use the information from the Annual Report for required annual reporting to Congress and makes the Annual Report information publicly available online through several OCS managed platforms including the performance management website, dashboards, and digital reports.

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.