



CSBG Annual Report OMB Clearance Network Comments Framing Tool

The Office of Community Services (OCS) has announced proposed revisions to the Community Services Block Grant (CSBG) Annual Report, which have been posted to the Federal Register for public review and comment. As required by the Paperwork Reduction Act (PRA) of 1995, ACF is soliciting public comment on these proposed changes to the statutorily required CSBG Annual Progress Report (OMB #0970-0492, expiration date 6/30/2024).

Learn more about the proposed changes by reviewing the following:

- [Dear Colleague Letter](#): An overview of the process, key changes, and timelines.
- [Proposed CSBG Annual Report 3.0](#): The proposed report with OCS changes incorporated.
- [Service to Outcome Plan](#): A document that links the proposed CSBG Annual Report services to proposed CSBG Annual Report outcomes.
- [Indicator Disposition Report](#): An overview of changes that have been made between the current CSBG Annual Report and what is seen in the proposed report.

These proposed changes to the CSBG Annual Report have significant implications for how agencies report on their activities, outcomes, and impacts. **Additionally, the proposed changes will have an impact on the statutorily required report OCS provides to the U.S. Congress. OCS needs to hear from local agencies, State and Regional Community Action Associations, and State CSBG Offices about the impact of the changes through the comment process.** You can use this document to review some of the key changes, identified benefits and challenges, and key themes for comments to help you craft personalized and detailed comments. **While this document is intended to provide you with framing for your comments, please ensure your comments are clear and specific to your individual agency – refrain from simply copying and pasting directly from this document.**

Submitting Comments

The 60-day public comment period is currently open, and network feedback is needed. To submit formal public comments directly to OCS, please visit the Federal Register notice and follow the instructions under the “Comments” section. **Submit all comments to infocollection@acf.hhs.gov by June 21, 2024.** You can learn more about OMB Clearance by checking out our [OMB Clearance FAQ](#).

Your feedback is essential to ensure that the final CSBG Annual Report reflects the needs and perspectives of our entire network. NCAP encourages each network member to submit individual comments, which allow you to share your unique context and explain how the proposed changes will specifically impact your organization. This personalized feedback is essential, as it helps OCS understand the diverse experiences and needs across our network.

Consider the following when drafting your comments:

- **Be Specific:** Relate the changes to your agency's specific context and operations.
- **Think Big Picture:** How will these changes impact the Community Action movement as a whole? Describe how changes may advance or set back the movement and national story.
- **Highlight Impacts:** Describe how the changes will impact your agency, your state, and community.
- **Propose Solutions:** Offer constructive suggestions for addressing the challenges posed by the changes.

In the Federal Register Notice, OCS identifies six key questions that respondents should consider related to the proposed information collection:

1. Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies.
2. The quality of the information to be collected.
3. The clarity of the information to be collected.
4. Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?
5. The accuracy of the agency's estimate of the burden of the proposed collection of information.
6. What, if any, additions, revisions, or modifications to the information collection would you suggest?

Please note that your agency comments do not need to address all six questions. Ensure that your comments clearly identify the document you are referencing (such as the CSBG Annual Report 3.0 or Service to Outcome Plan), Module, Section, and if applicable, the specific data point your comment references.

General Comments and Key Themes for Inclusion in Comments

The comments that follow reflect overarching feedback and possible strategies that can be used to develop your comments to the Federal Register Notice request.

- **Clear CSBG Annual Report 2.1 and Engage the Network for Revisions to 3.0:**
 - Note that OCS could clear and use the proposed CSBG Annual Report 2.1 while engaging the Community Action Network in an intentional, strategic manner before clearing the revised CSBG Annual Report 3.0 to ensure the final, cleared report reflects the needs, realities, and input of the Network. Consider and articulate how continuity of current reporting while working to strengthen the proposed changes will benefit your agency and the CAA network.

- **Emphasize Reporting Must Connect to the Statutory Purpose of CSBG:**
 - *The Need for the Data to Connect to Poverty Reduction, Community Revitalization, and Individual/Family Empowerment:*
 - The Annual Report should capture data that demonstrates CAAs are delivering on the purpose of CSBG- reduction of poverty, revitalization of communities, and empowerment of individuals and families.
 - *The Need for the CSBG Annual Report to Capture the Broad Array of Interventions and Outcomes Which Connect the Needs That Are Informed By the Statutorily Required Unique Community Assessments:*
 - The CSBG Act requires CAAs to develop services and strategies in response to identified community needs. Given the vast differences and diversity of communities, the services and strategies deployed by CAAs are place-based and can vary greatly. The CSBG Annual Report should reflect this diversity in services, strategies, and potential impacts by providing a broad array of possible interventions and outcomes to ensure that CAAs can accurately report their efforts in response to identified community needs. The CSBG Annual Report has long acted as a menu of potential strategies and outcomes, with CAAs matching their work to the appropriate services and indicators, along with adding additional indicators as needed.

- **Need to Reflect the Diversity and Scale of the Network:**
 - Stress the importance of reporting that reflects the key strategies and impacts of over 1,000 Community Action Agencies (CAAs) nationwide.
 - Discuss the balance needed between addressing the reporting burden and ensuring the report captures the full scope, impact, and results orientation of the network’s work.

- **Emphasize Collaborative Engagement:**
 - Share experiences and suggestions on how transparent, constructive stakeholder engagement can enhance the quality of the revisions and ensure the final report accurately reflects the diverse work of CAAs.
 - Highlight how intentional collaboration with the CSBG network can lead to more practical and effective reporting requirements that meet the needs of the Federal, state, and local levels.
 - Propose ideas for establishing regular and structured communication channels between OCS and the CSBG network, such as working groups or advisory panels.

- **Reinforce the Need for Practical and Reflective Reporting:**
 - Emphasize the importance of aligning the revised CSBG Annual Report with the ROMA framework, including our results-orientation, to support continuous improvement in service delivery and outcomes. Detail the importance of reporting on outcomes as changes in status that are achieved as a result of outputs, or services and strategies deployed by the CAA, and the importance of the report differentiating between these concepts.
 - Share your views on the necessity of capturing the comprehensive work of the wide range of CAAs across the country.

Key Changes, Potential Benefits and Challenges, and Possible Comments and Themes to Inform Network Comments

This section details specific proposed changes to the CSBG Annual Report; provides details of potential benefits and challenges as identified by the CSBG Network; and offers initial framing and themes to leverage in the creation of your own agency comments. **It is critical that your comments are framed from your own perspective and include your unique reflections on possible impacts to your agency and the broader CSBG network.** Avoid copying and pasting framing from below to ensure each of your comments are fully considered in the review process.

Note that the changes detailed below are not the only changes within the CSBG Annual Report – you should thoroughly review the proposed changes to identify critical areas for comment and feedback to OCS.

I. Changes in Report Structure

Key Changes	<ul style="list-style-type: none"> • OCS proposes changing the modules of the CSBG Annual Report, with the current Module 4 (Individual and Family Level) becoming Module 3; and the current Module 3 (Community Level Transformation) becoming Module 4. <p>The new proposed reporting structure is:</p> <ul style="list-style-type: none"> ○ Module 1: State Administration ○ Module 2: Eligible Entity Expenditures ○ Module 3: Individual and Family ○ Module 4: Community Level Transformation (optional)
Potential Benefits and Challenges	<ul style="list-style-type: none"> • While the proposed changes may seem minor at the federal level, they will result in: <ul style="list-style-type: none"> ○ The need for new training and updated materials to explain the shift in modules. ○ The need to update data systems to align with the new reporting formats.
Potential Comments and Key Themes	<ul style="list-style-type: none"> • Explain how these changes will impact your agency, specifically in terms of training, data systems updates, and the associated costs in time and financial resources. • Highlight that there is an opportunity to reduce burden by keeping the current report structure (Module 3: Community and Module 4: Individual and Family). While changes to Module 4 content would still be required based on OCS' proposal, there would be no additional costs related to exchanging the names and functions of Modules 3 and 4.

II. Changes in Reporting Period

Key Changes	<ul style="list-style-type: none"> All reporting will align to the Federal Fiscal Year (October 1 – September 30). This change will take effect for Federal Fiscal Year 2026.
Potential Benefits and Challenges	<ul style="list-style-type: none"> This change can strengthen the national story as all reporting reflects the same period. Those not currently reporting on the Federal Fiscal Year will need to shift their reporting, requiring updates to contracts, software, and training.
Potential Comments and Key Themes	<ul style="list-style-type: none"> Recognize the potential improvement in report quality at the federal level but highlight the impacts on agencies not currently reporting on a Federal Fiscal Year. Emphasize the need for training, tools, and resources to support states and agencies impacted by this shift. Highlight any specific challenges your agency anticipates or any suggested solutions you see to mitigate challenges such as cost.

III. Removal of CSBG Domain: Services Supporting Multiple Domains

Key Changes	<ul style="list-style-type: none"> The removal of Services Supporting Multiple Domains means that: <ul style="list-style-type: none"> Several key, cross-cutting services have been removed from the proposed report including: <ul style="list-style-type: none"> Case Management (current SRV 7a) Eligibility Determinations (current SRV 7b) Referrals (current SRV 7c) Identification documents (current SRVs 7h – j) Reentry Services (current SRV 7k) Immigration Support Services (current SRV 7l) Legal Assistance (current SRV 7m) Mediation/Customer Advocacy (current SRV 7o) Services including transportation, childcare, day centers, and clothing assistance have been moved into other domains. Agencies will need to determine how to handle reporting costs associated with cross-cutting or holistic services typically contained in this domain.
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III. Removal of CSBG Domain: Services Supporting Multiple Domains cont.

<p>Potential Benefits and Challenges</p>	<ul style="list-style-type: none"> • The crosscutting services found in this domain include services that are key to the holistic approach of Community Action. Their removal reduces the ability to tell the complete impact and reach of Community Action. • These crosscutting services often do not fall into one domain. For example, case management or coaching can involve employment, education, housing and more. CAAs often use person-centered practices that meet families where they are. Determining which domain to use to capture this work could be challenging. • Agencies may need to reallocate costs from cross-cutting services to specific domains.
<p>Potential Comments and Key Themes</p>	<ul style="list-style-type: none"> • Emphasize the importance of a holistic, integrated approach to service provision (including Whole Family Approach/2 Gen) and how the removal of these services diminishes the ability to report on and show the impact of this approach. • Detail the critical cross-cutting services your agency provides and their impact. Consider how this impact is important to telling not only your story, but the story of Community Action at the national level. • Advocate for the retention of crosscutting services in the report to accurately capture the comprehensive work of CAAs. • Detail how cross-cutting services enable CAA innovations like integrated services, Whole Family Approach, and Social and Economic Mobility more broadly. • Reflect on how CSBG's statutory purpose is undermined if there isn't a way to report on supports that are causal links to key short-term and long-term outcomes. • Emphasize that the CSBG Annual Report acts as a menu of possible options for reporting common services and requires flexibility to allow CAAs to report on the vast and flexible services and strategies deployed to address identified local needs. The elimination of these key services does not reduce the burden and may decrease the quality of the report.

IV. Addition of New Transportation Domain

Key Changes	<ul style="list-style-type: none"> OCS proposes adding a new Transportation domain to capture transportation services provided by CAAs.
Potential Benefits and Challenges	<ul style="list-style-type: none"> This update allows for the elevation of transportation work done by CAAs across the country. This update still will not capture the impact of transportation services where demographics on riders are not collected or where deduplication of people served is not possible.
Potential Comments and Key Themes	<ul style="list-style-type: none"> Share relevant details on your transportation program, and how the program may be reported (or still not be able to be captured) in this new domain and associated services. Acknowledge the importance of transportation services and their inclusion and elevation in the report. While this domain may elevate some of the work of the Network, there continues to be a significant gap in the ability to report the impact of the network related to transportation. CAA transportation services that do not collect information on riders to where they can deduplicate the people served will not be able to report their efforts within this domain in Module 3 (Individual & Family). CAAs who operate existing transportation will also not be able to report their efforts to serve thousands of people impacted by the operation of transportation systems in Module 4 (Community Level Transformation) under current guidance; this represents a significant impact that will continue to go unreported.

V. New Services to Outcome Plan

Key Changes	<ul style="list-style-type: none"> • OCS has provided a new Service to Outcome plan, aiming to directly link or map services to outcomes.
Potential Benefits and Challenges	<ul style="list-style-type: none"> • Potential for more accurate and consistent alignment of services to outcomes in the CSBG Annual Report. • There are limited implementation details, particularly regarding whether reporting a service is mandatory to report the associated outcome. • Some services do not neatly tie to specific outcomes, complicating the reporting process. • Many services can contribute to one outcome, which may not be adequately captured by the proposed plan.
Potential Comments and Key Themes	<ul style="list-style-type: none"> • Highlight the need for detailed guidance on intended implementation (for example, if reporting a service is mandatory to report an outcome) – without this detail, it is difficult to fully consider the proposed plan and offer comments. <ul style="list-style-type: none"> ◦ Consider highlighting that if OCS intends reporting a service as mandatory to report an outcome, this could present challenges for accurate and complete network reporting. In some cases, CAAs may not be able to deduplicate services, which can result in outcomes reported without linked services. Additionally, services do not always tie to specific outcomes, complicating accurate reporting. • Depending on the intent and implementation of this Outcome Plan it may reduce flexibility, limiting a local CAAs ability to be responsive to the unique local conditions in which it operates. • Suggest that OCS provide further information on the proposed implementation and allow feedback on this proposal in its next public comment period.

VI. Addition of Concrete Supports

Key Changes	<ul style="list-style-type: none"> • Identification of “concrete supports” within reportable services to capture essential services that do not directly result in outcomes.
Potential Benefits and Challenges	<ul style="list-style-type: none"> • This change reflects the reality that some services are about stabilization to support individuals and families in specific, tangible ways that may not lead to immediate or clear outcomes. • This framing aligns with the work of Chapin Hall at the University of Chicago on economic and concrete supports.
Potential Comments and Key Themes	<ul style="list-style-type: none"> • Highlight how the addition of Concrete Supports is a positive addition that reflects the critical work CAAs do to stabilize individuals and families.

VII. Streamlining of Reportable Services

Key Changes	<ul style="list-style-type: none"> • Reduction of reportable services to streamline data collection • Current SRV 1a – 1q (employment services) have been merged into 4 services that focus on skills training and opportunities for youth/adults; employment supplies; and services for employment retention • Removed services related to post-secondary training for adults • Shift from home visiting services to “evidence-based home visiting programs” • Merged SRV 3a – 3e and 3m – 3o into one service capturing the number of individuals receiving training and counseling for income management and asset building. <ul style="list-style-type: none"> ◦ This merging includes services related to VITA, savings accounts/IDAs, and homebuyer counseling • Merged housing services into seven services that cover rental/mortgage assistance; eviction prevention services; utility payment assistance; rapid re-housing/housing placement; housing maintenance and improvement services; and weatherization services • Consolidated healthcare, nutrition, and hygiene services <ul style="list-style-type: none"> ◦ Consolidation included the removal of SRV 5kk Family Mentoring and SRV 5mm Parenting Classes • Eliminated services related to leadership training, citizenship classes, and volunteer training • As detailed in III, eliminated key services including Case Management; Eligibility Determinations; Referrals; Identification documents; Reentry Services; Immigration Support Services; Legal Assistance; and Mediation/Customer Advocacy
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VII. Streamlining of Reportable Services Cont.

<p>Potential Benefits and Challenges</p>	<ul style="list-style-type: none"> • Removal of duplicative services will reduce burden • Streamlining may result in an underreporting of critical services offered by CAAs, including employment services, adult education supports, income and asset building services (such as VITA), and cross-cutting services that broadly support social and economic mobility.
<p>Potential Comments and Key Themes</p>	<ul style="list-style-type: none"> • Describe how eliminated reportable services result in an incomplete picture of agency efforts and diminish reporting quality at the local, state, and especially federal levels. • Consolidation of services can help to streamline reporting; however, we must find balance with consolidating to the point that the Network can clearly explain its interventions and strategies to create change. • Possible messaging for key services eliminated/consolidated: <ul style="list-style-type: none"> ○ <u>Providing employment services is central to meeting the statutory purpose of CSBG. Employment services are a key offering of CAAs to support social and economic mobility. Employment services should reflect the array of services offered to help people find, maintain, and grow their employment.</u> ○ Income and asset building services are a key offering of CAAs to support social and economic mobility. Greater detail of key services offered by CAAs, such as VITA, will improve the quality of the report. ○ Cross-cutting services such as those eliminated in Service Category 7 are a key feature of the type of holistic service provision provided by CAAs; eliminating Services Supporting Multiple Domains eliminates the ability to highlight this critical approach. • Emphasize that the CSBG Annual Report acts as a menu of options for reporting common services and requires flexibility to allow locally driven agencies to report on the vast and flexible services and strategies deployed to address local needs. The elimination of these key services does not reduce the burden and may decrease the quality of the report and its statutory fidelity.

VIII. Consolidation of Family and Individual Outcomes (New Module 3)

<p>Key Changes</p>	<ul style="list-style-type: none"> • Consolidation of reportable Family/Individual National Performance Indicators (FNPIs), including: <ul style="list-style-type: none"> ○ Employment: Reduced to capturing only unemployed youth and adults who increase skills to obtain employment, and employed individuals who increase income from wages/salaries. ○ Education & Youth Development: Reduced/ revised to include enrollment in early childcare/childhood education; youth connected to education and skills development programs; obtaining a high school diploma/GED/ABE; obtaining credentials/certifications for education or employment; enrollment in post-secondary degree programs; and obtaining a post-secondary degree. ○ Parents/Caregivers and Children: Eliminated indicators for parents/caregivers improving home environments and children improving their skills/education (i.e., literacy, school readiness, performing at grade-level). ○ Income/Asset Building: Reduced to capturing only the completion of income/asset building training; individuals who open savings accounts/IDAs; and purchasing a home. ○ Health and Nutrition: Consolidated to capture individuals who improved health and well-being through preventative measures; access to health coverage; receiving reproductive services; receiving wellness services; older adults receiving home visits; improvement of mental health, behavioral health, and well-being; receiving preventative oral health services; and receiving access to healthy food options. ○ Elimination of 7a: Removed the indicator for the number of individuals who achieved one or more outcomes in the identified NPIs across one or more domains. ○ Elimination of “z” Indicators: Removed the ability to report custom outcomes.
<p>Potential Benefits and Challenges</p>	<ul style="list-style-type: none"> • Streamlining of outcomes could potentially help to focus the national story. • Streamlining may result in an underreporting of the impact of Community Action, especially in domains such as employment, education, and family well-being. • Potential loss of flexibility to track custom outcomes at the federal level.

VIII. Consolidation of Family and Individual Outcomes (New Module 3) Cont.

<p>Potential Comments and Key Themes</p>	<ul style="list-style-type: none"> • Describe how the eliminated outcomes result in an incomplete picture of agency impact and diminish reporting quality at the local, state, and especially federal levels. Specifically: <ul style="list-style-type: none"> ○ Employment: Discuss how the focus on skills and income from wages/salaries might overlook other critical employment-related outcomes such as job attainment, retention, and career advancement. Employment outcomes should reflect key impacts of CAAs to support social and economic mobility. ○ Education and Youth Development: Highlight concerns about the reduced scope of education indicators, potentially missing important developmental milestones improvements and broader educational impacts. ○ Holistic Impact on Families: Detail how removing these indicators might undermine the understanding of how CAAs contribute to the overall wellbeing of families. Emphasize the importance of capturing improvements in parenting practices, family interactions, and children's developmental progress. • Fewer employment and education indicators, the removal of “z” indicators, along with the addition of the use of concrete economic supports, may reduce flexibility and make it more difficult for agencies to demonstrate impact on the statutory purpose of CSBG. • Discuss how your organization uses “Z” indicators to report custom outcomes, and their importance for gathering not just local but also state and national data on Network outcomes for incorporation in future updates of reporting tools. • Consolidation of outcomes can help to streamline reporting; however, we must find balance with consolidating to the point that the Network can clearly explain its interventions and strategies to create change. • Reduction of reportable outcomes does not necessarily result in a reduced reporting burden since not all agencies report on all outcomes. It is important that the report reflect a variety of possible outcomes to reflect the broad impact of the national network. • While outcome 7a of the prior CSBG Annual Report was an important attempt to highlight total impact, there have been significant challenges in implementation of its intended purpose. Consider recognizing that the removal of 7a will reduce reporting burden and improve data quality.
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IX. Inclusion of Outputs in the Family National Performance Indicators

<p>Key Changes</p>	<ul style="list-style-type: none"> • The proposed changes to the CSBG Annual Report include integrating outputs within the Family National Performance Indicators (FNPIs). Outputs often focus on the receipt of services or the state of being, rather than measuring the actual impact or change resulting from the services. <ul style="list-style-type: none"> ◦ Reporting outputs as an FNPI duplicates data reported under services. For example, the Service to Outcome Plan indicates SRV2a and SRV2b number of individuals receiving Early Head Start and Head Start services maps to FNPI2a, the number of young children (0-5) enrolled in childcare or early childhood education services. Enrolling in childcare is an output, not an outcome.
<p>Potential Benefits and Challenges</p>	<ul style="list-style-type: none"> • Receipt of service is less burdensome to measure as opposed to outcomes and impact, which often require follow up and specific measurement. • Shifting to focusing on outputs rather than outcomes can diminish our focus on true impact and change and undermines Results Oriented Management and Accountability (ROMA) teachings and principles. • The quality and relevance of reported data may decrease, making it harder to assess the effectiveness of programs accurately. • This shift could represent a step backward, undoing years of progress in outcome-based reporting and evaluation.
<p>Potential Comments and Key Themes</p>	<ul style="list-style-type: none"> • Advocate for the retention of outcome-focused reporting, in line with the principles of ROMA, including maintaining a focus on outcomes (change in status) rather than outputs (such as receipt of services) to ensure the CSBG Annual Report continues to reflect the actual impact on families and individuals. • Highlight how CAAs already gather and report outcomes for various programs, such as early childhood education services and Head Start. The removal of these types of outcomes may not reduce burden and can result in an incomplete picture of the impact of Community Action. • Highlight how outcomes provide a more accurate measure of your agency’s effectiveness and the long-term benefits of your services. • Highlight how focus on outcomes better reflects the impacts of Community Action at a national level. • Outline how these changes may conflict with the established principles of ROMA, which have been integral to Community Action Agencies.

X. Module 4: Community Level Transformation and Outcomes

<p>Key Changes</p>	<ul style="list-style-type: none"> • OCS proposes shifting Module 3 (Community Level Transformation) to Module 4 in the new report. • Community Level Transformation continues to be designated as “optional.” OCS indicated previously under the current Annual Report that Module 4 reporting is optional. • Community Level Transformations continue to only be reportable for new community-level efforts (as opposed to maintaining community-level assets and services such as established transportation systems, community centers, affordable housing complexes, etc.)
<p>Potential Benefits and Challenges</p>	<ul style="list-style-type: none"> • The CSBG Act indicates revitalization of communities is part of the statutory purpose of CSBG. OCS’s position that reporting data on community level change is “optional” has sent a message that this work is not critical or necessary. Additionally, OCS does not include any community level change data in the CSBG Annual Report to Congress. This erroneously conveys to Congress that CAAs are not changing community conditions. • Designating community level work as optional leads to underreporting of critical activities, losing the ability to capture key CAA efforts that provide substantial community benefits. • Excluding ongoing community initiatives from reporting overlooks significant, impactful work that CAAs perform, such as running transportation services, facilitating senior day centers, providing community centers, and administering affordable housing.
<p>Potential Comments and Key Themes</p>	<ul style="list-style-type: none"> • To a great extent, the reporting of any data element on services and outcomes in the Annual Report is optional. CAAs only report services and outcomes if they have determined there is a need in their community and make an effort to meet the need. Stress that community level work is integral to the CSBG purpose and should not be designated as optional – rather, it should be required when CAAs plan and deploy community-level strategies. • Advocate for the inclusion of both new and ongoing community initiatives in reporting to reflect the full scope of CAA activities and impacts. • Emphasize that excluding ongoing community initiatives undermines the recognition of sustained, essential services that contribute to community well-being.

XI. Removal of Household Income Sources Datapoint

Key Changes	<ul style="list-style-type: none"> • Removal of household income source data point from demographics reporting.
Potential Benefits and Challenges	<ul style="list-style-type: none"> • Without data on household income sources, the full impact of services on financial stability may be underreported. • Critical insights into the economic conditions of the served populations could be lost.
Potential Comments and Key Themes	<ul style="list-style-type: none"> • Highlight the necessity of household income data for understanding and demonstrating the economic impact of services. • Share examples of how income data has been critical for program development, evaluation, and debunking myths about who the CAA assists. • Detail how this data is already gathered for eligibility purposes and elimination of this point will not reduce burden.

XII. Removal of Datasets that Cannot be Unduplicated

Key Changes	<ul style="list-style-type: none"> • Removal of section of report within demographics that captures program datasets that cannot be unduplicated.
Potential Benefits and Challenges	<ul style="list-style-type: none"> • Potential risk of underreporting of impact due to programs datasets that cannot be integrated into agency reporting systems or otherwise unduplicated.
Potential Comments and Key Themes	<ul style="list-style-type: none"> • Highlight why some datasets cannot be unduplicated, and the number of people typically served in those datasets. • Share how you use this data, or how it could be used, to leverage data sharing agreements or to otherwise improve systems to allow for integration of datasets.

XIII. Module 1: State Office and Organizational Standards

Key Changes	<ul style="list-style-type: none">• While there are several changes to Module 1, two changes that are of interest to CAAs include:<ul style="list-style-type: none">◦ Removal of reporting on aggregated Organizational Standards compliance from the CSBG Annual Report (<i>Note: This does not remove the requirement for Organizational Standards, only removes the reporting</i>)◦ Removal of reporting state American Customer Satisfaction Index (ACSI) reporting.
Potential Benefits and Challenges	<ul style="list-style-type: none">• Streamlined reporting processes could reduce administrative burden.• Potential lack of transparency on key aspects of state administration and network performance metrics.
Potential Comments and Key Themes	<ul style="list-style-type: none">• Highlight concerns about transparency and availability of data related to CSBG Organizational Standards and ACSI reporting.

How to Submit Comments

Review the proposed changes with your agency and peers, begin formulating your comments, and plan to submit them by June 21, 2024.

Submit your comments by emailing infocollection@acf.hhs.gov by June 21, 2024. Title your comments “Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Progress Report (Office of Management and Budget No. 0970-0492).”

NCAP Assistance

[Check out NCAP’s OMB Clearance webpage](#) for tools, resources, and information to support your comment submission. The National Community Action Partnership (NCAP) is hosting a series of events to discuss and provide support for public comments on the proposed changes to the Community Services Block Grant (CSBG) Annual Report. These events include:

- [Overview of NCAP Response to the CSBG Annual Report Proposed Changes](#) (Wednesday, June 12, at 4 PM ET | 3 PM CT | 2 PM MT | 1 PM PT)
- **NCAP Office Hours: CSBG Annual Report Proposed Changes Public Comments and Feedback** (choose the option that works best for you):
 - [Friday, June 14, at 1 PM ET | 12 PM CT | 11 AM MT | 10 AM PT](#)
 - [Tuesday, June 18, at 3 PM ET | 2 PM CT | 1 PM MT | 12 PM PT](#)

Have a question or need other assistance? Email us at CSBG@communityactionpartnership.com

