National Community Action Partnership

Overview of NCAP Response to the CSBG Annual Report Proposed Changes

June 12, 2024

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The Promise Of Community Action



Community Action changes people's lives, embodies the spirit of hope, improves communities, and makes America a better place to live. We care about the entire community, and we are dedicated to helping people help themselves and each other.

Agenda

- Background & Overview
- Review of Key Changes
- NCAP Comments
- How to Submit Comments
- Next Steps

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CSBG Annual Report

Serves important purposes at the national level:

- Provides the basis for the Congressional Report
- Supports telling the national CSBG story

Serves important purposes at the state level:

- Supports telling the statewide CSBG story
- Tool for the state to fulfill their oversight & management function

Serves important purposes at the local level:

- Understanding organizational impact
- Supports telling the local CSBG story
- Performance Improvement

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OMB Clearance Overview

- When collecting information from the public, the federal government is required to seek approval from the Office of Management and Budget to ensure that the information collected does not pose a burden

- Federal agencies submit their planned data collection to OMB to post in the Federal Register, giving the public 60 days to comment, followed by appropriate revisions of the collection before a final comment period that lasts at least 30 days

- OMB clearance lasts for three years

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CSBG Annual Report OMB Clearance

- Current CSBG Annual Report OMB clearance expires June 2024
- Updated CSBG Annual Report has been posted for public comment here
- **Timeline**
  - Federal Register Notice # 1: April 22, 2024 (60-day comment period)
    - **Comment Period Closes: June 21, 2024**
  - Federal Register Notice # 2: June 28, 2024 or before (30-day comment period)
  - Anticipated OMB Clearance: Winter 2024
    - FFY 2025 (Oct 1, 2024 – Sep 30, 2025) – Option to use revised current report or new CSBG Annual Report
    - FFY 2026 (Oct 1, 2025 – Sep 30, 2026) – Network will use new CSBG Annual Report



NCAP COMMENTS IN RESPONSE TO OCS PROPOSED CHANGES

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Key Themes



Process



Burden



Quality



Clarity

Process

- There are significant changes proposed in the CSBG Annual Report Version 3.0. While OCS gathered feedback through site visits, review of report data, and through network engagements, *there was not a specific effort to gather and consult the network about the improvements needed in the CSBG Annual Report.*
  - **NCAP recommends that OCS consider clearing CSBG Annual Report Version 2.1 (a largely unmodified version of the current report) while engaging in deeper collaboration with the Community Action network prior to clearing Version 3.0**

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Burden

- The proposed changes will necessitate extensive updates to state processes, reporting approaches, data systems, and training across the network, incurring substantial costs.
  - **NCAP recommends OCS collaborate with the network to provide supports, training, and resources to help with the transition to the new report when cleared.**
  - **NCAP recommends OCS maintain the current reporting structure (with Module 3 as Community Level and Module 4 as Individual/Family Level) to reduce burden from proposed change.**
  - **NCAP recognizes reporting on a consistently on the Federal Fiscal Year can improve the national story and reporting quality; however, for those currently on a FFY period will face significant burdens and need additional, specialized support.**

Burden

- The Office of Community Services proposes extensive streamlining of datapoints collected to reduce burden. NCAP does not agree that all suggested changes decrease burden. For instance:
  - **CAAs do not report on every data point contained in the CSBG Annual Report; thus, eliminating indicators is not likely to significantly reduce the reporting burden but will compromise the quality and comprehensiveness of the report. The CSBG Annual Report is currently built as a menu of options.**
  - **While CAAs and states can continue to collect additional data beyond the CSBG Annual Report as suggested, this does not eliminate burden but rather shifts burden from the federal to the state and local levels.**
  - **NCAP members have indicated that data points around hours of capacity building and staffing certifications pose additional burden; thus, we are supportive of the proposal to remove these points from the report.**
  - **NCAP believes OCS has overestimated the burden reduction associated with Version 3.0, as reduced datapoints can paradoxically increase burden by requiring greater deduplication efforts to report in fewer datapoints. Deduplication is a significant driver of burden at the local level.**

Quality

- There are several positive changes in the proposed CSBG Annual Report Version 3.0 that may help to improve report quality.

  - **NCAP recognizes the inclusion of *Concrete Supports* as a positive step forward in the CSBG Annual Report, reflecting the critical work CAAs do to stabilize individuals and families.**

  - **The inclusion of the new Transportation Domain elevates the recognition of the critical transportation work done by CAAs around the country, although the full impact of this work will likely still be unreportable due to deduplication challenges and limitations on what is reportable in Community Level Transformation.**

Quality cont'd

- OCS proposes significant streamlining of Family National Performance Indicators (FNPIs) and Services (SRVs) that, while intended to reduce burden, may compromise report quality (and agency flexibility).
  - **NCAP recommends OCS incorporate the holistic, cross-cutting services eliminated from Services Supporting Multiple Domains to ensure the report is reflective of the integrated approach to service provision championed by Community Action and supported by CSBG's statutory purpose.**
  - **NCAP recommends that OCS revise its proposed Family National Performance Indicators (FNPIs) to ensure they are reflective of our outcomes-orientation and do not mix outputs and outcomes.**
  - **NCAP recommends that OCS revise its proposed FNPIs to include a number of eliminated or streamlined FNPIs and SRVs related to employment, education, asset building, and family outcomes and supports, along with the *inclusion of "z" indicators* to allow for flexibility to reflect the unique outcomes not otherwise captured by the federal report.**

Quality cont'd

- OCS proposes removal of datapoints within the "All Characteristics" section of the report that may reduce quality.
  - **NCAP recommends retaining the *household income source* data point in demographics reporting to ensure the accurate representation of the economic impact of services provided by CAAs and to maintain critical insights into the economic conditions of the populations they serve.**
  - **NCAP recommends retaining the ability to report datasets that cannot be deduplicated to ensure a comprehensive and accurate representation of the impacts of CAAs.**

Clarity

- Additional detail or updated guidance is needed to ensure the report fully reflects the work of Community Action prior to clearance.
  - **NCAP recommends that OCS remove the "optional" framing from Module 4 in the CSBG Annual Report Version 3.0 and update its guidance to allow for reporting of ongoing Community Action initiatives within the module.**
  - **While the new Services to Outcome plan may support more consistent alignment of services and outcomes , it is unclear if reporting a service as detailed is mandatory for reported associated outcomes. OCS should consider the complex relationship between services and outcomes to ensure its detailed implementation is reflective of the work of Community Action and consider feedback on this proposal in deeper, intentional engagement with the CSBG network.**



Questions, Feedback, and Discussion

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Submitting Comments

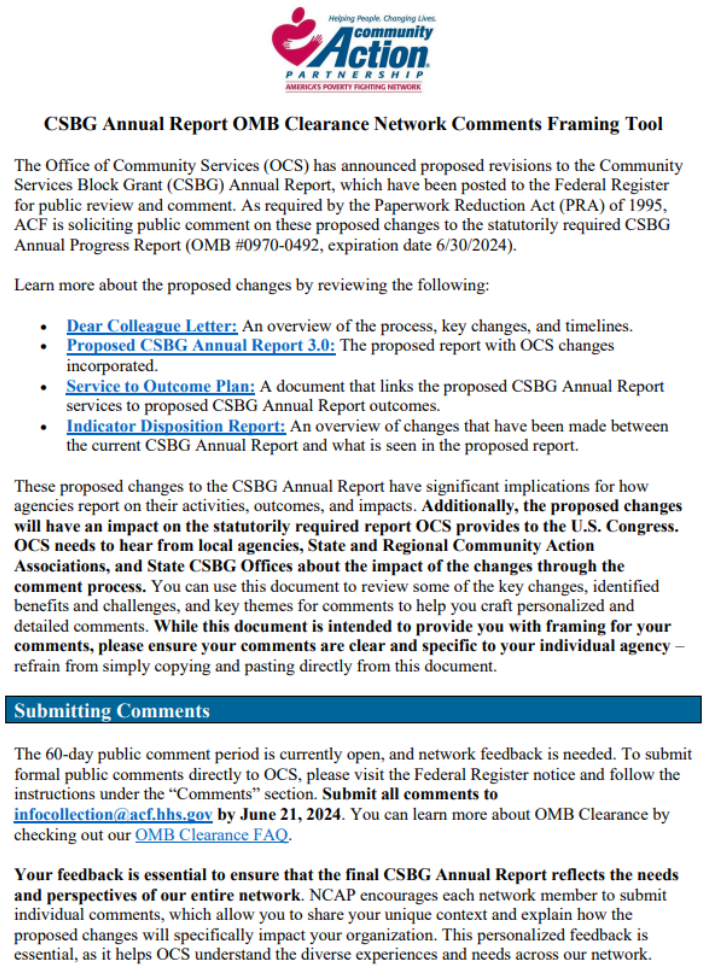
- Network members (CAAs, Associations, State Offices) and the general public can provide comments by emailing infocollection@acf.hhs.gov
  - Make sure to identify all comments by the title of the information collection: "*Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Progress Report (Office of Management and Budget No. 0970-0492).*"
  - Keep comments clear, concise, and specific to your organization – avoid copy/paste
  - Comments do not need to answer all questions posed by OCS, and can be as simple as an email detailing key feedback for consideration
  - Check with your agency leadership about process for submitting comments

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Use Our New Comments Framing Tool!

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.

Access the tool here



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.

Need Help?

Join NCAP for Office Hours: CSBG Annual Report Proposed Changes Public Comments & Feedback

Select the day/time 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

Register and Learn More:

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Contact Us!

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