National Community Action Partnership

CSBG Annual Report Version 2.1: Clearance Process Update and Public Comment Opportunities

July 17, 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
- National Sign-On Letter
- National Partner Comments Overview
- How to Add Your Support
- 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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5 Steps of OMB Clearance

Federal law requires agencies to obtain approval from the Office of Management and Budget (OMB) for collection of information from the public

1. **Agency designs information collection** and estimates the burden on the public (i.e., the number of paperwork hours it would require).
2. **Agency publishes the proposed collection** in the Federal Register and provides 60 days for the public to comment on whether the collection is necessary, the accuracy of the agency's burden estimate, and the quality, utility, and clarity of the data the collection will yield.
3. After the 60 days, the **agency reviews all comments, makes any changes it finds appropriate, submits its proposed data collection to OMB** in the form of an information collection request (ICR), and pusblishes a second notice in the Federal Register alerting the public that the ICR has been sent to OMB for approval.
4. The **public has 30 days to submit comments to OMB** on the ICR.
5. **OMB has 60 days to (1) approve ICR; (2) instruct agency to make changes; or (3) reject ICR** – if approved, the agency may collect the information for up to three years.

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Federal Register Notice # 1: April 22, 2024 (60-day comment period)

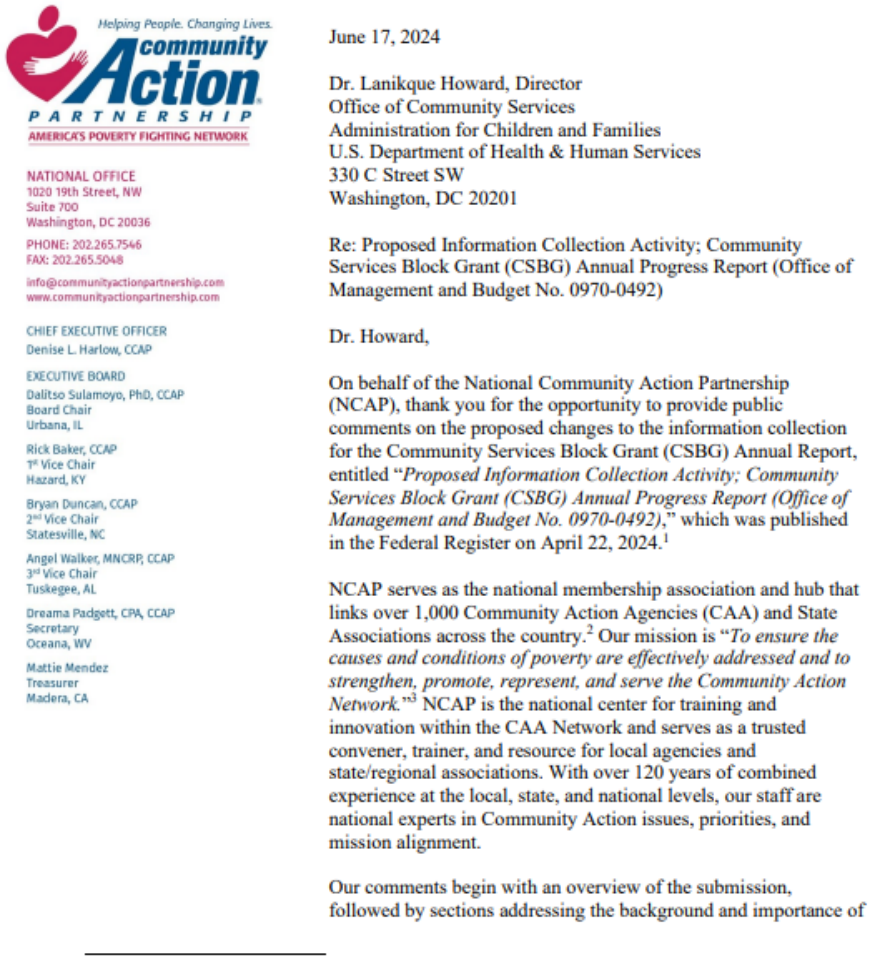
- OCS posted two Versions of the CSBG Annual Report for Public Comment:
  - Version 2.1 (slightly modified current version of the Report)
  - Version 3.0 (significant changes proposed)

- **NCAP, CSBG National Partners, and Network members submitted a substantial number of comments to OCS regarding the significant proposed changes to CSBG Annual Report Version 3.0**
  - Many comments suggested OCS delay submission of Version 3.0 for further clearance due to significant Network concerns, and clear version 2.1 to allow for uninterrupted data collection while working with the Network to revise Version 3.0

- Comment Period Closed June 21, 2024

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Version 3.0 Public Comments Submitted



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June 17, 2024

Dr. Lanikque Howard, Director
Office of Community Services
Administration for Children and Families
U.S. Department of Health & Human Services
330 C Street SW
Washington, DC 20201

Re: Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Progress Report (Office of Management and Budget No. 0970-0492)

Dr. Howard,

On behalf of the National Community Action Partnership (NCAP), thank you for the opportunity to provide public comments on the proposed changes to the information collection for the Community Services Block Grant (CSBG) Annual Report, entitled "*Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Progress Report (Office of Management and Budget No. 0970-0492)*," which was published in the Federal Register on April 22, 2024.[1]

NCAP serves as the national membership association and hub that links over 1,000 Community Action Agencies (CAA) and State Associations across the country.[2] Our mission is "*To ensure the causes and conditions of poverty are effectively addressed and to strengthen, promote, represent, and serve the Community Action Network.*"[3] NCAP is the national center for training and innovation within the CAA Network and serves as a trusted convener, trainer, and resource for local agencies and state/regional associations. With over 120 years of combined experience at the local, state, and national levels, our staff are national experts in Community Action issues, priorities, and mission alignment.

Our comments begin with an overview of the submission, followed by sections addressing the background and importance of

[1] Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Progress Report (Office of Management and Budget No. 0970–0492), 89 Fed. Reg. 29,339 (April 22, 2024).
[2] *About Us*, Community Action Partnership, https://communityactionpartnership.com/about-us/ (last visited Sept. 16, 2019).
[3] *Mission & Promise*, Community Action Partnership, https://communityactionpartnership.com/mission-and-promise/ (last visited Sept. 16, 2019).

- NCAP Version 3.0 Public Comments can be viewed here
- All Public Comments can be reviewed here

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Federal Register Notice # 2: June 28, 2024 (30-day comment period for Version 2.1)

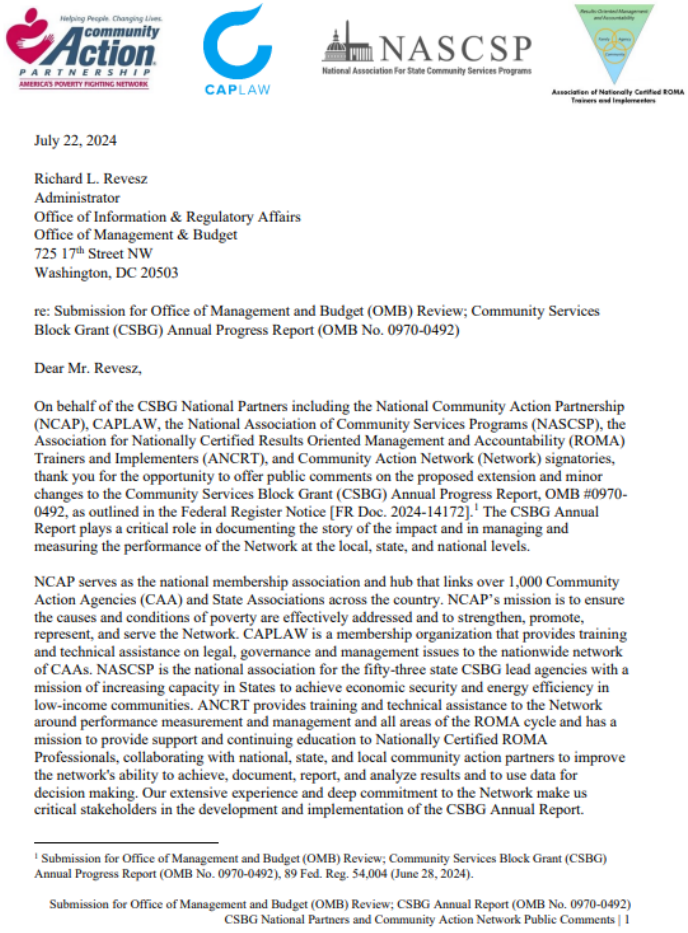
- Based on the number of comments received, OCS moved forward with seeking clearance of CSBG Annual Report Version 2.1 (and CSBG Tribal Annual Reports) and **delayed seeking clearance of 3.0**.
  - The current public comment period is *only* for Version 2.1 and CSBG Tribal Annual Reports.

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National Partner Sign-On Letter for Version 2.1

- In response to Version 2.1, the CSBG National Partners (NCAP, CAPLAW, NASCSP, ANCRT) have summarized key Network feedback to develop a Network Sign-On letter

- Network members can add their support by signing-on (with authorization from the agency CEO/ED) ***through July 19th***



July 22, 2024

Richard L. Revesz
Administrator
Office of Information & Regulatory Affairs
Office of Management & Budget
725 17th Street NW
Washington, DC 20503

re: Submission for Office of Management and Budget (OMB) Review; Community Services Block Grant (CSBG) Annual Progress Report (OMB No. 0970-0492)

Dear Mr. Revesz,

On behalf of the CSBG National Partners including the National Community Action Partnership (NCAP), CAPLAW, the National Association of Community Services Programs (NASCSP), the Association for Nationally Certified Results Oriented Management and Accountability (ROMA) Trainers and Implementers (ANCRT), and Community Action Network (Network) signatories, thank you for the opportunity to offer public comments on the proposed extension and minor changes to the Community Services Block Grant (CSBG) Annual Progress Report, OMB #0970-0492, as outlined in the Federal Register Notice [FR Doc. 2024-14172].[1] The CSBG Annual Report plays a critical role in documenting the story of the impact and in managing and measuring the performance of the Network at the local, state, and national levels.

NCAP serves as the national membership association and hub that links over 1,000 Community Action Agencies (CAA) and State Associations across the country. NCAP's mission is to ensure the causes and conditions of poverty are effectively addressed and to strengthen, promote, represent, and serve the Network. CAPLAW is a membership organization that provides training and technical assistance on legal, governance and management issues to the nationwide network of CAAs. NASCSP is the national association for the fifty-three state CSBG lead agencies with a mission of increasing capacity in States to achieve economic security and energy efficiency in low-income communities. ANCRT provides training and technical assistance to the Network around performance measurement and management and all areas of the ROMA cycle and has a mission to provide support and continuing education to Nationally Certified ROMA Professionals, collaborating with national, state, and local community action partners to improve the network's ability to achieve, document, report, and analyze results and to use data for decision making. Our extensive experience and deep commitment to the Network make us critical stakeholders in the development and implementation of the CSBG Annual Report.

[1] Submission for Office of Management and Budget (OMB) Review; Community Services Block Grant (CSBG) Annual Progress Report (OMB No. 0970-0492), 89 Fed. Reg. 54,004 (June 28, 2024).

SUMMARY SIGN-ON LETTER COMMENTS

Summary Comments



Reiteration of recommendation to use the time afforded by clearing Version 2.1 to deeply engage with the CSBG Network and co-create an updated Version 3.0 that represents the work and fulfills the needs of the Network



Recommended removal of questions on reporting Technical Assistance Plans to OCS



Encourage OCS to update its Module 3 guidance to allow for comprehensive community-level reporting and clarify the “optional” nature of Module 3

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Summary Comments cont.

- Recommend OCS to work with the CSBG Network to develop reporting guidance and definitions
- Ask OCS to provide clarification on the process or formula used to determine burden estimates
- Recommend OCS develop and review CSBG Annual Report validations with Network data experts to reduce burden
- Recommend OCS collaborate with the Network to develop and deliver tailored training and technical assistance

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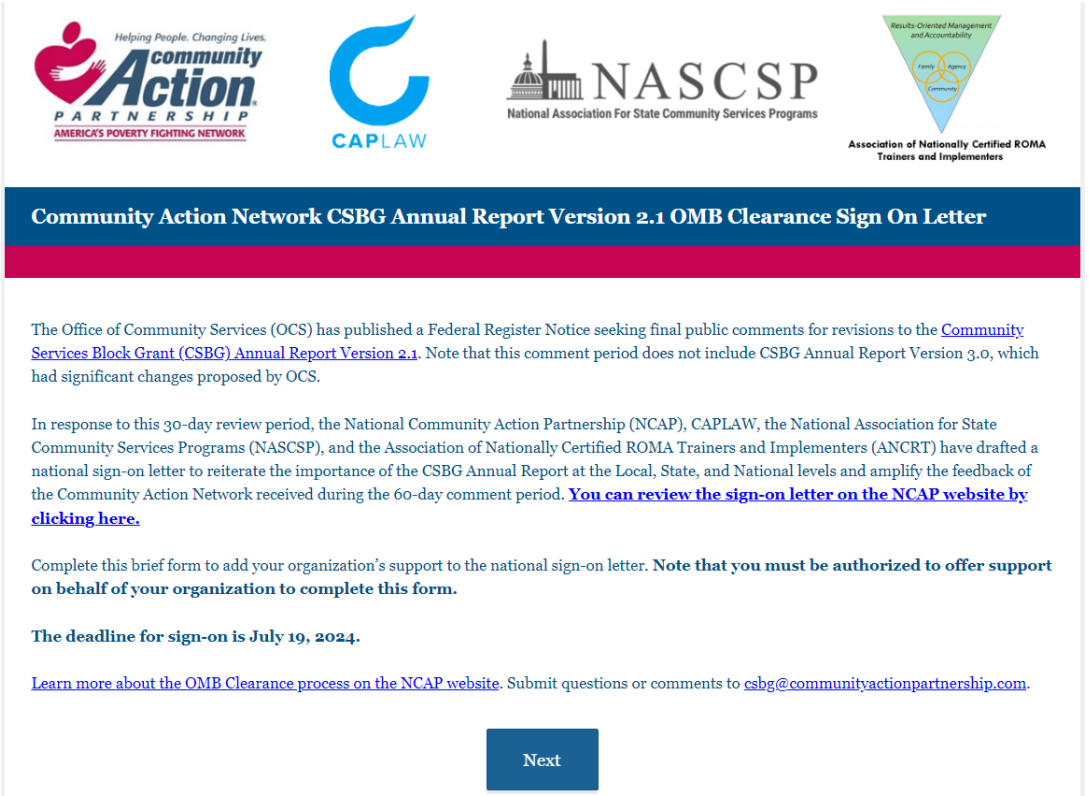


Questions, Feedback, and Discussion

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Sign-On to the National Partner Letter by July 19, 2024

To add your support to the National Partner letter, complete this brief form. *You must either be the ED/CEO or authorized to sign on behalf of your organization.*



Community Action Network CSBG Annual Report Version 2.1 OMB Clearance Sign On Letter

The Office of Community Services (OCS) has published a Federal Register Notice seeking final public comments for revisions to the Community Services Block Grant (CSBG) Annual Report Version 2.1. Note that this comment period does not include CSBG Annual Report Version 3.0, which had significant changes proposed by OCS.

In response to this 30-day review period, the National Community Action Partnership (NCAP), CAPLAW, the National Association for State Community Services Programs (NASCSP), and the Association of Nationally Certified ROMA Trainers and Implementers (ANCRT) have drafted a national sign-on letter to reiterate the importance of the CSBG Annual Report at the Local, State, and National levels and amplify the feedback of the Community Action Network received during the 60-day comment period. **You can review the sign-on letter on the NCAP website by clicking here.**

Complete this brief form to add your organization's support to the national sign-on letter. **Note that you must be authorized to offer support on behalf of your organization to complete this form.**

The deadline for sign-on is July 19, 2024.

Learn more about the OMB Clearance process on the NCAP website. Submit questions or comments to csbg@communityactionpartnership.com.

Next

https://www.surveymonkey.com/r/CSBGAR21SignOn

Want to Submit Your Own Comments?

Written comments can be submitted at www.reginfo.gov/public/do/PRAMain by selecting "Currently under 30-day Review—Open for Public Comments" or using the search function.

All public comments are due by July 29, 2024

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Contact Us!

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