CSBG Annual Report Version 3.0: What's New and How to Comment

October 24, 2024

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CAPLAW

NASCSP
National Association For State Community Services Programs

Results-Oriented Management and Accountability
Family Agency Community
Association of Nationally Certified ROMA Trainers and Implementers

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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 publishes 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.

OMB Clearance Process Update

April 2024

- 60 Day Comment Period for CSBG Annual Report Version 2.1 and 3.0
  - Network Members submitted comments
  - NPs submitted comments

June 2024

- CSBG Annual Report Version 2.1 released for 30-Day Public Comment Period
  - National Partner Sign-On Letter

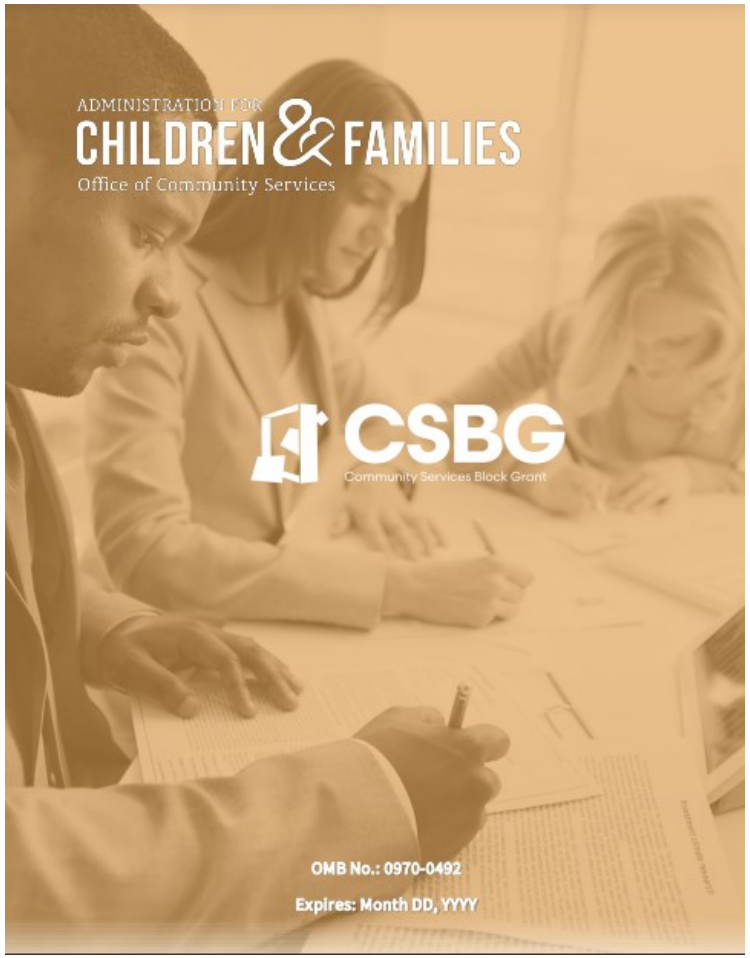
October 2024

- Revised CSBG Annual Report Version 3.0 released for 30-Day Public Comment Period

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30-Day Comment Period for CSBG Annual Report Version 3.0

- OCS Dear Colleague Letter: Annual Report 3.0 30-Day Comment Period
- CSBG Annual Report Version 3.0 (30-Day Comment Period)
- FRN Comment Workbook (all comments received in response to the 60-day Comment Period with OCS response)
- CSBG Annual Report Version 3.0 30-Day Comment Period Federal Register Notice



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Summary of Proposed Version 3.0 Changes

** Indicates changes since 60-day comment period Version 3.0*

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Proposed Approach & Structure Changes to Version 3.0

- Optional in FFY 2026 (October 1, 2025 – September 30, 2026); required in FFY 2027 (October 1, 2026 – September 30, 2027)
- Move to Federal Fiscal Year Reporting
- Swap of Module 3 (now Family Level)/Module 4 (now Community Level)
- No Services Supporting Multiple Domains
- New Transportation Domain

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Version 3.0 Updates – Module 1 & 2

Module 1

- Reduction of State Accountability information collected in Module 1*
- Removed CSBG Organizational Standards Performance Reporting

Module 2

- New Transportation domain incorporated/Services Supporting Multiple Domains removed
  - Detail on Agency Capacity Building activities removed*
- Staff certification section removed

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Version 3.0 Updates – Module 3, Individual & Family Level Services

"Other" added to all domains*

New section "Service Delivery Access" includes eligibility determinations, referrals, and case management services*

Significant reduction & combining of reportable services*

Counts of service for select services like diapering supplies and transportation services*

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Version 3.0 Updates – Module 3, Individual & Family FNPIs

Added “Other” to all FNPI domains*

Mixture of Outputs & Outcomes

Reduction & combining of FNPIs

FNPIs added based on Network feedback related to employment, skill development, and health & wellbeing*

Additional details/rewording of NPIs to indicate change (received, increased, participated, etc.)*

Version 3.0 Updates – Module 3, All Characteristics Report

Revised Gender Identity, Race and Ethnicity characteristics*

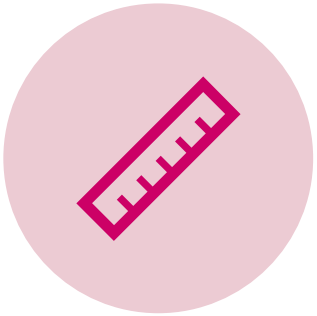
Restored sources of Household Income*

Removed section allowing for reporting of individuals served who could not be unduplicated by program

Items Not Included in Clearance

- Services to Outcome Plan
- “Concrete Supports”
- Module 4 (Community Level) Reporting Guidance

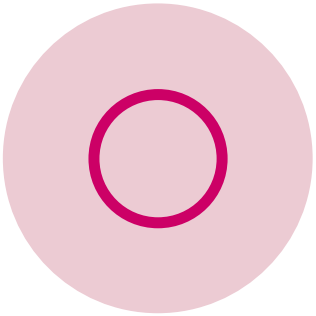
Drivers of Changes from OCS Comments



MEASURE VALIDITY & MEASUREMENT TOOLS



BURDEN



“UNDERUTILIZATION”

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Identified Gaps

Whole Family Outcomes

- Child Outcomes related to age-appropriate development
- Parent/Caregiver Outcomes related to parenting, family functioning

Disaster Response Services & Outcomes

Holistic Picture of Community Action Efforts

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SUMMARY NATIONAL PARTNER SIGN-ON LETTER COMMENTS

Key Theme – Process & Engagement



Network as Practitioners and Experts: CAAs and State Offices are not just data reporters—they are experts in the day-to-day realities of service delivery and community needs. Their expertise should be respected, sought out, and leveraged in designing solutions



Inadequate Engagement: OCS's limited collaboration with the Network and absence of early, substantial engagement has resulted in gaps and missed opportunities to strengthen the report.



Call for Collaborative Co-Creation: We recommend OCS establish a consistent, two-way engagement process with the Network to co-create solutions. This will ensure that updates are informed by practitioners who know best how the report functions at local, state, and national levels.

Summary Comments and Recommendations

Ensure the report effectively captures both outcomes and outputs:

- Refine FNPIs to distinguish between outputs (process measures) and outcomes (changes achieved).

Ensure the report is reflective of the work of Community Action:

- Include & restore key services and outcomes tied to social and economic mobility, parenting supports, asset building, housing counseling, disaster services, etc.
- Maintain report flexibility to accommodate the diverse work of CAAs and prevent oversimplification that limits the ability to tell the Community Action story.

Strengthen state accountability reporting:

- Reinstate data collection tied to State Plans and State Accountability Measures to improve oversight and transparency.

Summary Comments and Recommendations

Address reporting burden:

- Engage the Network in developing tools to reduce reporting burden, such as validations, while ensuring the report reflects the full impact of CAAs.
- OCS should allocate new resources to offset costs of database updates, system changes, and training

Clarify and provide time for implementation:

- Align with the timeline suggested in the Federal Register Notice for optional use in FY 2026, ensuring the Network has adequate time to prepare and transition to the new reporting system.

Develop clear and collaborative guidance and support:

- Partner with CSBG National Partners and the Network to create comprehensive reporting guidance, training, and technical assistance that is relevant and responsive to Network needs.

Sign-On to the National Partner Letter by October 31, 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 3.0 OMB Clearance Sign On Letter

The Office of Community Services (OCS) has published a Federal Register Notice seeking final public comments for the proposed revisions to the Community Services Block Grant (CSBG) Annual Report Version 3.0. These revisions include significant changes to data collection and reporting for Community Action Agencies (CAAs).

In response to this 30-day review period, the National Community Action Partnership (NCAP), Community Action Program Legal Services (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. The letter focuses on critical recommendations to ensure that the updates to the CSBG Annual Report are reflective of the work and outcomes of the Community Action Network. Key points include the need for collaborative, clear guidance; relevant training and technical assistance; and preserving a strong outcomes-based approach to reporting. The letter also encourages OCS to engage more deeply with the Network as these changes move forward. **You can review the sign-on letter on the NCAP website by clicking here.**

https://www.surveymonkey.com/r/CSBGAR30SignOn

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Questions, Feedback, and Discussion

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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 November 9, 2024.

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NCAP CSBG Annual Report Version 3.0 Office Hours

October 28, 2024 @ 2pm ET

(1pm CT | 12pm MT | 11am PT)

October 30, 2024 @ 4pm ET

(3pm CT | 2pm MT | 1pm PT)

Learn more & register on the NCAP website

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Contact Us!

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