



NASCSP

NATIONAL ASSOCIATION FOR STATE COMMUNITY SERVICES PROGRAMS

June 21, 2024

Office of Community Services  
Administration for Children and Families  
U.S. Department of Health and Human Services  
(OMB #0970-0492, expiration date 6/30/24)  
Attn: Desk Officer for the Administration of Children and Families  
Email: [infocollection@acf.hhs.gov](mailto:infocollection@acf.hhs.gov)

RE: CSBG Annual Report Revisions (OMB #0970-0492, expiration date 6/30/24)

Dear Office of Community Services:

National Association for State Community Service Providers (NASCSP) is writing in response to the Office of Community Services' (OCS) release of the Dear Colleague Letter (DCL), [ACF-OCS-DCL-24-09](#), advising the CSBG Network of the notice of information collection activity posted in the *Federal Register*, Vol. 89, No. 78, on April 22, 2024. We appreciate the opportunity to provide feedback to OCS about the proposed changes.

NASCSP is the national association for the fifty-three state Community Services Block Grant (CSBG) lead agencies. Our mission is “*increasing capacity in States to achieve economic security and energy efficiency in low-income communities.*” For more than twenty years, NASCSP has served as the national performance management training and technical assistance center for the CSBG Network. NASCSP’s staff and its State members have extensive CSBG experience on the local, state, and national levels. This experience has given us expertise, knowledge, and insight into the CSBG’s data collection and reporting systems.

NASCSP’s overall recommendation is as follows:

**OCS should only move forward with the approval of the CSBG Annual Report v.2.1 for FY24 and FY25. OCS should delay the approval of the CSBG Annual Report v.3.0 until more robust engagement of the CSBG Network can occur and there is ample lead time and federal guidance provided prior to implementation.**

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## REASONS FOR DELAY RECOMMENDATION

### Lack of Engagement of the CSBG Network in v.3.0 Development

As key stakeholders in the annual reporting process, NASCSP and its membership recognize that OCS' intent is to improve the current CSBG Annual Report v.2.0 so that the annual data collection and reporting process is less burdensome and the quality and clarity of the information being collected is stronger. However, NASCSP is deeply concerned about the lack of involvement from the CSBG Network in the development of the Report v.3.0 earlier in this process. As the CSBG Act states, the CSBG performance measurement system, which includes the CSBG Annual Report, should be created "in collaboration with the States and with eligible entities throughout the Nation." Given the significant changes from the Report v.2.0 and the important recognition in this DCL that "[t]he CSBG Annual Report...is intended to guide the collection and organization of meaningful performance data...the data collected is not only meaningful, equitable, and compliant, but also focuses on the key information needed tell the CSBG story," we are especially concerned that OCS' limited engagement with the Network beforehand does not reflect a systemic, collaborative approach to the proposed revisions. Instead, we believe this approach—from the lack of early engagement to the inadequate review period—undermines the years of collaboration and partnership on which this Network was built 60 years ago. We believe that something as important as the Annual Report would be worth delaying implementation, while considering and incorporating some of the feedback that will be received in this process, and follow-up outreach and information gathering that OCS could lead.

### Possible Negative Impact to Telling the CSBG Story

As acknowledged by OCS, the CSBG Annual Report is not only about meeting the CSBG Act's requirement of collecting and submitting information needed for the creation of the annual report to Congress. It is also about telling the CSBG story. It is about demonstrating how the CSBG program works on both the individual and community levels to reduce poverty, revitalize communities, and empower low-income families and individuals to become self-sufficient (goals of CSBG as defined in the CSBG Act). It is about sharing how eligible entities use a broad and flexible range of funding, service strategies, community initiatives, and partnerships to address the causes and effects of poverty. It also tells the story of the linkages and partnerships States create with other federal and state-funded antipoverty programs. Telling this story is extremely important, not only to demonstrate accountability and good stewardship of federal funds, but also to show that the CSBG program truly is making a lasting difference to the lives of low-income individuals and families and to the communities in which they live. However, with the proposed Report v.3.0, NASCSP is concerned about whether it will help the Network tell the CSBG story that *should* be told: how it changes people's lives and improves communities.

A major reason for this concern is the proposed movement from outcomes to outputs. For more than 20 years, the CSBG program has utilized the NPIs as a vital storytelling tool.

Unlike services that communicate what activities were *performed*, the NPIs communicate what results were *achieved*. The proposed Report v.3.0 is a significant departure from this approach, focusing more on outputs rather than outcomes. Rather than being the result of the service, many NPIs are just a rewording of the service language. This change is a movement backwards towards “bean counting” rather than what has changed for clients and the community because of CSBG Network efforts.

CSBG is one of the most unique funding sources in that it allows flexibility to use the resources based on the needs of the community and the individuals living in it. The Network needs a CSBG Annual Report that truly can showcase this uniqueness. However, the proposed decrease in the service and outcome options available to eligible entities will prevent the Network from robustly reporting at the national level what is happening at the local level. While the current list of services and indicators may need to be revised and targeted training and technical assistance may need to be increased to improve data collection and reporting, the significant decrease in the Service and NPI menu of options proposed in Report v.3.0 will make it difficult to demonstrate for national stakeholders the true impact of the funding stream at the local level.

It is important to reiterate that NASCSP recognizes that revisions may be needed and, if done correctly, could help the Network better illuminate the CSBG story. However, because OCS did not systemically engage the Network to more fully investigate what changes and additional support may be needed, it is unclear whether the proposed changes in Report v.3.0, or if other changes identified through a collaborative approach, would be more effective in achieving this result. For example, the elimination of the Multiple Services and Outcome domain is one such revision that NASCSP and its members believe would have the negative consequence of not being able to report the comprehensive CSBG story.

It is also important to point out that that many States and eligible entities use the current lists of Services and NPIs to communicate and advocate at the state and community levels. Several of these data points have been proposed to be eliminated or revised. While OCS has emphasized that States and eligible entities still are free to collect additional data beyond what is reported nationally, the resulting effect may just be shifting the data collection burden from the federal level to the state and local level, not an actual decrease in the burden as OCS indicated is a primary reason for the proposed changes.

Further, the proposed revisions to the Services and NPIs in Report v.3.0 will not only impact the Network’s ability to tell its current story, but also will risk losing critical trends that provide a long-term perspective of this funding stream. The current Services and NPIs have been in place for almost ten years, making available to the Network a lot of historical data for longitudinal trend analysis. However, as the proposed v.3.0 Report’s Services and NPIs are significantly different—because of deletion, modification, and/or merging—the ability to compare them with the 2.0 options would be hampered significantly, effectively eliminating the Network’s ability to demonstrate CSBG’s long-term outcomes and

successes and, therefore, the “understanding of what combination of services or strategies produce the best outcomes for specific populations, family types, and communities” (ACF-OCS-CSBG-DCL-24-09).

### **No Identified Long-Term Decrease with Significant Increase in Burden for Several Years**

OCS identified a decrease in the burden of data collection as a key reason for the proposed Report v.3.0. However, OCS estimates the burden for the proposed version at an estimated average of 198 hours per grantee and 697 hours per subgrantee, which, notably, is the same estimated burden of the current Report 2.0. As such, while OCS is proposing a significant revision to the report, it is not estimating a burden decrease.

Furthermore, as v.3.0 differs significantly from v.2.0, it must be recognized that the implementation of the proposed Report v.3.0 will actually increase the data collection and reporting burden for several years, an increase that will be felt by both States and eligible entities. States and eligible entities have implemented policies, protocols, forms, and systems based on the Report v.2.0, as well as invested significant resources and efforts to maintain these systems and processes. To align with the proposed version, States and eligible entities will need to expend substantial efforts and financial resources to substantially modify these systems and processes, provide additional training and technical assistance, and ensure full and seamless compatibility and integration.

### **Inadequate Implementation Timeframe**

It also is important to recognize that the implementation of new systems will take time, and that a realistic timeline, including stages for testing, training, and full deployment, is absolutely required to determine how compatible these new systems will be with the existing infrastructure. One NASCSP member summed up this concern, noting: “We need a clear process for evaluating and ensuring that new systems can integrate seamlessly with the current ones, or we should receive clear recommendations for new data systems that align with the reporting needs.” The timeframe presented by OCS is not adequate to implement the significant changes proposed. If approved, the Report v.3.0 could be implemented beginning with federal fiscal year (FY) 2025. While the FY25 report would not be due until March 31, 2026, the actual data collection period for this FY begins October 1, 2024. However, as ACF-OCS-CSBG-DCL-24-09 states, the anticipated OMB clearance process is not expected to conclude until Winter 2024. This is after FY25 begins. As the Report v.3.0 is significantly different than the current version, States, eligible entities, and the software vendors must know what the reporting requirements will be and have adequate federal guidance at least six months in advance before the collection period begins. This lead time allows States and eligible entities to implement system changes, review, test, and revise the changes, and train staff on the changes. Anything less than six months increases the burden on States and eligible entities and could negatively impact the quality of data submitted while the Network “builds the plane as it goes,” navigating possible course corrections and seeking additional guidance. This could lead to issues

with data reliability and validity, resulting in inconsistent information over the 12-month reporting period. Even during the proposed FY25 implementation period in which States can choose to use version 2.1 or version 3.0, having adequate lead time for implementation is important if the data obtained during that year can be compared to future years.

## **OVERALL RECOMMENDATION: Move forward with Approval of CSBG Annual Report v.2.1 but delay the approval of CSBG Annual Report v.3.0**

As the OMB clearance process ends on June 30, 2024, NASCSP understands that OCS must seek approval to continue collecting CSBG data. As the proposed Report v.2.1 is not requesting substantial changes from the current report (v.2.0), NASCSP recommends that OCS move forward only with approval for the CSBG Annual Report v.2.1 for the FY24 and FY25 years.

NASCSP also recommends that OCS does not move forward with approval of the CSBG Annual Report v.3.0. NASCSP agrees that the current Report v.2.0 could be improved through both revisions and targeted training and technical assistance, and if done correctly, could improve the quality of data collected, help tell both the national and local story of how CSBG changes lives and improves communities, could decrease the data collection and reporting burden, and provide adequate time for implementation. However, the current approach to move forward with the proposed CSBG Annual Report v.3.0 raises significant concerns whether it will be an improvement from the current one. Any changes to the CSBG Annual Report must be beneficial to the entire Network and should reflect the needs of all. We note that there are differing opinions amongst the Network about whether the proposed Report v.3.0 is best for all. It is for this reason that NASCSP recommends that the proposed CSBG Annual Report v.3.0 be tabled until more systemic efforts are employed to engage with States and eligible entities to modify the current CSBG Annual Report through a collaborative approach that ensures that the Network has a report that complies with the CSBG Act requirements, supports the CSBG Network in obtaining information that tells the national CSBG story, preserves the uniqueness and diversity of the local level, and has a more reasonable data collection and reporting burden.

## **COMMENTS ON THE PROPOSED CSBG ANNUAL REPORT V.3.0**

While we strongly recommend that OCS delay the approval of the CSBG Annual Report v.3.0 until it undertakes a more systemic approach to engage and collaborate with States and eligible entities, NASCSP also is offering specific feedback on some of the proposed V.3.0 changes should OCS choose to move forward with the approval process.

### **All Modules**

**Adequate Training and Technical Assistance:** One concern brought to NASCSP's attention by its membership centers on the training and technical assistance required to properly implement the Report v.3.0. **NASCSP recommends that if the CSBG Annual**

**Report v. 3.0 is approved, adequate guidance and support be provided to the States and the eligible entities immediately after approval.** Such guidance should be in the form of clear instruction on and definitions of what is being collected to ensure that the Report is being implemented consistently across the CSBG Network, that adequate training and technical assistance to understand and implement the revised Report is provided, and that adequate financial support to modify the existing systems is made available. An example of this might be a Service and NPI definitions manual.

## State Administration – Module 1

**NASCSP recommends that OCS keep both *Section B: Statewide Goals and Accomplishments* and *Section D: Organizational Standards for CSBG Eligible Entities*.**

OCS indicated that this information will still be obtained by other means. Therefore, it is important to recognize that the removal of these sections will not lead to a decrease in reporting burden. It will only be switching data collection to a less formal, non-OMB approved format. As one purpose of the CSBG Annual Report is to demonstrate accountability of both States and eligible entities and both sections are based on performance measurements implemented by the CSBG Network as a part of its Performance Management Framework, the CSBG Annual Report is the appropriate place to collect this information.

## All Eligible Entity Modules

**Module 2 and the Proposed Module 3 Federal Fiscal Year (FFY) Reporting Period:** In the CSBG Annual Report v. 3.0., OCS proposes that all modules would shift to reporting on the Federal Fiscal Year (October 1 to September 30). This could pose challenges for approximately 40 percent of the States currently using either the calendar year or state fiscal year reporting option. Modifications to subrecipient contracts, data systems, and other forms would be required, and would result in undue burdens during the implementation phase. **NASCSP recommends that States be allowed to continue reporting their data using the three reporting options, and that OCS table the mandated requirement until discussions are held with the impacted States to determine the feasibility of the proposed change.**

**Reorganization of Modules and Sections:** While this may seem to be a cosmetic change with limited impact, its implications are far-reaching and inadvertently send the wrong message. Many States and eligible entities have data systems and data collection/reporting resources in place that follow the current Report, including the use of the numbering system. Moving modules and/or sections around would require a significant overhaul of the forms and databases to realign them with the 3.0 version. Additionally, States have heard concerns from eligible entities that moving the Community level module to the end of the report conveys that community level work is somehow less important. **NASCSP recommends that the current report order be maintained.** The added benefit of this recommendation is that States and eligible entities could focus efforts on the other changes, specifically the implementation of substantial changes to the Services and NPIs.



**Proposed Module 3, Section A Unduplicated Requirement:** OCS’ decision to leave the unduplicated number of individuals served requirement is a concern to NASCSP’s membership. This continues to be a pain point for many eligible entities and the States because this requirement is very difficult to meet. The reality is that a majority of eligible entities must operate multiple data systems for the various programs they administer, and most of these systems do not have interoperability functionality. To obtain an unduplicated count requires double data entry for most eligible entities or bringing together the data in another program, such as Excel, to identify duplicates. Regardless of the approach, obtaining an unduplicated count results in an increased burden to complete the CSBG Annual Report. As this is often unreasonable for most agencies, the real result of the unduplicated requirement is that many eligible entities are unable to report on the services and outcomes from non-CSBG funded programs, leaving the breadth and depth of these services and outcomes grossly underreported nationally.

**NASCSP recommends that OCS review the unduplicated requirement and consider changes to the proposed Report v.3.0 that would promote opportunities for more robust reporting agency-wide without a significant burden to do so.** The issue is complex. NASCSP therefore recommends a tiered approach, one that temporarily eases up on the unduplicated requirement while investing additional financial resources that the Network could access to establish and maintain data bridges. The approach also should include the establishment of a clear interoperability federal level directive on establishing and maintaining data bridges with other Federal programs (e.g., Head Start, WIC, HUD, SNAP, WIOA, etc.).

### **All Characteristics Report – Module 3 Proposed**

In the proposed All Characteristics Report (proposed Module 3, Section C), OCS recommends the removal of Sources of Household Income, Other Income Sources, and Non-Cash Benefits. NASCSP acknowledges that these data points are often a reason for annual report validation triggers and agrees that revisions are necessary for burden reduction and improved data quality. However, complete removal of all three data points would be a strong disservice to CSBG advocacy efforts. Many policymakers who do not support antipoverty programs, such as CSBG, often paint a negative picture of those assisted. “Lazy”, “taking advantage”, and other similar comments are frequently used by CSBG opponents to describe the individuals it assists. Being able to counter these arguments with actual data, such as the percent of individuals that are working, those receiving Social Security, or those receiving Social Security Disability Insurance, is an important element of telling the CSBG story and counters the false narrative shared by those who do not understand or support CSBG. **Rather than complete removal of the three Household income questions, NASCSP suggests simplifying questions 13 and 14, eliminating question 15, and providing additional training and technical assistance.**

- Question 13 Sources of Household Income Simplification: Eligible entities are required to obtain income information to determine programmatic eligibility determination for many funding sources. This process often requires that the

individual served provide information on the source(s) of income received and the amount received during a specified period. As this information is being obtained and is often recorded in the eligible entity's data collection system, it is not burdensome to require sources of household income be reported on the CSBG Annual Report. However, the current report's eight options (not including Unknown/not reported) under Question 13 can be simplified significantly to four options: 1) Income from Employment Only; 2) Income from Employment and Other Sources; 3) Income from Other Sources Only; and 4) No Income. NASCSP believes that by simplifying this question, data quality can be improved while supporting the obtainment of valuable information.

- Question 14 Other Income Source Simplification: There are fourteen options (not including Unknown/not reported) that are currently reported under Question 14. This can be simplified to only include the most common and/or the ones that are important to the CSBG story, such as Social Security (any type), Supplemental Security Income, TANF, Pension, Unemployment Insurance, and Other. NASCSP believes that by simplifying this question, data quality can be improved while supporting the obtainment of valuable information.
- Question 15 Non-Cash Benefits Removal: This information is not required to determine programmatic eligibility determination for many funding sources, is not vital in telling the CSBG Story, and creates an unnecessary burden. NASCSP supports the removal of the current report's question 15.
- Increased Targeted TTA: As both questions 13 and 14 have been challenging for some eligible entities, increased targeted TTA would be an essential element for improved data quality. NASCSP believes that this approach, along with the modifications proposed above, rather than the complete elimination of data points is necessary as it would allow the Network to obtain valuable, accurate income information that could be used in telling the CSBG story.

**NASCSP also recommends the removal of the Unknown/not reported option under all questions.** It is unnecessary, as it does not add valuable information. Eligible entities have many funding sources, and not all collect the same demographics as CSBG. Agencies are not required to report on every demographic of those assisted. Therefore, it is expected that data for specific demographics—Age, Disability Status, Household Size, etc.—will be less than the total number of individuals or households for which at least one demographic was obtained. Requiring an agency to add a number to Unknown/not reported just to match the total unduplicated number is burdensome and increases the likelihood of errors.

## **Community Level – Module 4 Proposed**

In addition to the concern about the proposed movement from Module 3 to Module 4, there is an added concern that the Community Level module remains optional. The CSBG program has a legislative mandate to revitalize communities through the “strengthening of community capabilities for planning and coordinating the use of a broad range of Federal,



State, local, and other assistance (including private resources) related to the elimination of poverty, so that this assistance can be used in a manner responsive to local needs and conditions.” Making this module, which is intended to capture the performance measurement of community level initiatives, optional negatively impacts the proper, accountable, and robust data collection and reporting that OCS seeks with the Report v.3.0. NASCSP acknowledges that this module continues to be challenging for eligible entities. However, we do not support the optional approach OCS has taken regarding it. **Rather, we encourage OCS to require this module, as well as providing the needed tools and guidance to help eligible entities meet this requirement.**

## Conclusion

Over the years, the collaboration between OCS and the CSBG Network has been instrumental to the success of this vital funding stream. As CSBG continues to evolve and adapt to the needs of families and communities across the country, we rely on our strong partnership with OCS to find collective and comprehensive methods to meet those needs. It is in the spirit that we look to OCS to strongly consider the feedback and insights offered in this letter, alongside those of our partners nationwide, including the States, eligible entities, RPICS, state CSBG associations, and national partners, such as CAPLAW and NCAP. We encourage OCS to only move forward with the implementation of the CSBG Annual Report v.2.1 at this time, and more fully engage the CSBG Network with the development of the 3.0 version to ensure that the CSBG Annual Report truly highlights the Network’s efforts to change lives and improves communities, minimizes the data collection and reporting burden, and provides adequate time to implementation and guidance.

Sincerely,

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