



NASCSP

NATIONAL ASSOCIATION FOR STATE COMMUNITY SERVICES PROGRAMS

November 8, 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) [FR Doc. 2024-23271]

Dear Mr. Revesz,

National Association for State Community Service Providers (NASCSP) is writing in response to the Office of Community Services' (OCS) request for an Office of Management and Budget (OMB) review and approval of the CSBG Annual Report v.3.0., as posted in the *Federal Register*, Vol. 89, No. 196, on October 9, 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 unique and specialized expertise, knowledge, and insight into the CSBG's data collection and reporting systems.

Before suggesting specific revisions to the proposed report, NASCSP first would like to provide overall comments on the report and the process that was used to create the CSBG Annual Report v.3.0.

- **Necessity of Information Collected:** OCS, the CSBG lead agencies, and the CSBG eligible entities are federally mandated to demonstrate accountability and performance information. NASCSP agrees that, on the whole, the CSBG Annual Report is appropriate and necessary to meet this. However, NASCSP is offering revision suggestions that would help promote the quality and clarity of the information being collected.

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- Substantial Engagement of the CSBG Network:** NASCSP shares the concern of many in the CSBG network that OCS created the CSBG Annual Report v.3.0 without **substantial** involvement for the CSBG lead agencies and CSBG eligible entities. NASCSP acknowledges OCS' statements that feedback was obtained, the key word being "substantial." As the 3.0 version is significantly different than the current 2.1 version, having adequate, widespread engagement of the CSBG network is a must as it impacts more than 1,000 CSBG eligible entities and 56 CSBG lead agencies. Many in the CSBG network were unaware that OCS was planning to revise the CSBG Annual Report and were only alerted to this when the notice of information collection activity was posted in the *Federal Register*, Vol. 89, No. 78, on April 22, 2024. While no recommendations are being offered regarding the initial 3.0 proposal, NASCSP asks that OCS recognize the frustration and concern of the CSBG network regarding the process taken to create the 3.0 version and take the necessary steps in the future to ensure that meaningful engagement of the CSBG network occurs prior to publication in the *Federal Register*.
- Acknowledgement of OCS' Revisions:** NASCSP acknowledges that OCS spent substantial time reviewing the feedback received from the 60-Day comment period and revised the CSBG Annual Report v.3.0 based on this. Additionally, NASCSP appreciates that the implementation schedule has been postponed by a year.

CSBG ANNUAL REPORT V.3.0 REVISION REQUESTS

When referencing deletions made in the proposed CSBG Annual Report 3.0, (version 2.1) will be used. If this is not listed, then the comment refers to version 3.0.

Module 1, Section B Statewide Goals and Accomplishments (version 2.1) and Module 1, Section C Organizational Standards for Eligible Entities

NASCSP acknowledges that OCS has stated in both the indicator disposition document that was released when the 60-day comment period began and in its response to the 60-day comments that it will continue to obtain information about statewide goals and accomplishments and organizational standards through non-CSBG Annual Report avenues, including the CSBG State Plan, monitoring activities, and calls between the CSBG lead agency and the OCS Program Specialist. However, NASCSP has concerns about this.

First, the state plan process, as the name implies, is only about planning. It indicates "what will be done", "what the expected results will be", and similar *anticipated* outcomes. Currently, the CSBG Annual Report is the vehicle for obtaining information about "what was done", "what the actual results were", and similar *actual* outcomes. With the proposed

change that removes the entire Section B (version 2.1) and most questions from Section C, OCS will need to implement a new process to obtain the actualized information it is still planning to obtain, as the CSBG State Plan only collects the anticipated information.

This leads to the second concern that OCS' continued collection of post-State Plan information through other non-CSBG Annual Report avenues results in the removal of it from Office of Management and Budget (OMB) and Paperwork Reduction Act (PRA) oversight. While this is not necessarily the issue, it is the lack of clarity about what will be collected, when it will be collected, and if all OCS Program Specialists will consistently collect it. Questions include: Will OCS still require the state offices to report the same level of information as is currently being collected? Will OCS collect the same amount of information during all bimonthly calls, rather than annually as is collected now? Will all Program Specialists follow the same data collection template to ensure consistency? Due to these unknowns, NASCSP has concerns about quality, clarity, and estimated time burden, including the possible increase in CSBG lead agencies reporting burden, inconsistent reporting burdens depending on who the OCS Program Specialist is, and if there will be overall decreased accountability. Without knowing more about the data collection process OCS proposes, it is difficult to assess if obtaining information through non-CSBG Annual Report avenues is the best approach.

Recommendation

NASCSP's recommendation is that OCS provides clear guidance about what information will be collected, the frequency of what will be collected, and how it will be consistently applied by the Program Specialists before the CSBG Annual Report 3.0 is approved by OMB. This is recommended because it is unknown how OCS's proposed changes will impact CSBG lead agencies. If clarification is not possible, then the recommendation is to continue collecting Module 1, Sections B and D as it is in the CSBG Annual Report v.2.1.

Module 1, E.1. Training and Technical Assistance

OCS has proposed adding evaluation measures to the Training and Technical Assistance (TTA) table. While there are differing opinions about this, most NASCSP members surveyed support the change. It is important to note though that some have expressed the need for OCS to provide guidance on how to establish evaluation methods.

It is also important to note that this new column is not on the current CSBG Annual Report. A change, while supported, will still lead to an increase in reporting burden when completing Module 1, Section E State Training and Technical Assistance.

Another change that OCS proposed is the moving Training and Technical Assistance Organizations (Module 1, F.2. version 2.1) from being a separate question to a part of the E.1. table. While this may seem a lateral move that will not impact the reporting burden, the result will be to the contrary. Rather than CSBG lead agencies answering the question once

as an aggregation of all TTA provided, they will now have to answer it each time TTA was provided. A majority of NASCSP members surveyed would prefer to leave TTA Organization as a separate, one-time answered question as it is in the CSBG Annual Report v.2.1.

Recommendation

NASCSP recommends removing TTA Organization from the Module 1, E.1 table and making it a separate question as it is in the CSBG Annual Report v.2.1.

Modules 2, 3, and 4

OCS has proposed requiring all Module 2-4 data to be reported following the Federal Fiscal Year (FFY). In the current version 2.1, there are two additional options – Calendar Year (January 1 to December 31) and State Fiscal Year (July 1 to June 30). The CSBG lead agency chooses the reporting period in which most of the CSBG FFY funds are expended. It is important to understand why the current approach is best for the State lead agencies and the CSBG eligible entities. Since the federal funds can be expended up to two FFYs, some states have different program years that start after the FFY. For example, Kansas' CSBG program uses an April 1 to March 31 program year. This means that FFY24 funds, which were scheduled to be released on October 1, 2023, were not made available to the CSBG eligible entities until April 1, 2024. Having flexibility when funds are distributed is necessary but poses a challenge when submitting the CSBG Annual Report. Using Kansas still as an example, its program year in which the FFY's CSBG funds are expended ends the same day as when that FFY's CSBG Annual Report is due. Other states that use a State Fiscal Year for the program year have a greater challenge in that they may still be expending the FFY's CSBG funds three months after the FFY CSBG Annual Report is due.

Recommendation

NASCSP recommends continuing to allow the CSBG lead agencies to choose the reporting period that best matches the requirement of when most of the FFY's CSBG funds are expended. If this is not possible, OCS will need to provide additional guidance how it expects CSBG lead agencies to report using the FFY when CSBG funds are not distributed and expended during the same period.

Module 3, Section A Individual and Family Services

NASCSP acknowledges that OCS has made several changes to this section based on feedback received from the 60-day comment period, including: the creation of the service delivery and access section, the addition of new transportation services, the removal of the transportation service under the Income and Asset domain, and the addition of allowing an agency to include another service. There are a few changes that NASCSP believes will improve the quality and clarity of what is being collected.

Recommendation

*When a wording change is recommended, the revised language is listed in **bold, underlined font**.*

- *Other Services:* It appears that agencies are only allowed to add one other service. NASCSP recommends that this be increased to four. This would allow maximum flexibility for reporting and help inform future versions of the CSBG Annual Report.
- *Number of Individuals Served Column Header:* While most services require an unduplicated count of individuals assisted, not all do, including many under the Transportation domain and several under the Health and Nutrition domain. The mismatch between the column header and the service language may be confusing. Revising it to Unduplicated Number Served/Number of Services Provided, which is what is actually being reported depending on the service, may also be confusing. NASCSP recognizes that there may not be an appropriate revision to the header language. Rather, the best option may be to provide appropriate TTA and resources to provide the clarity needed.
- *SRV 2g. The number of individuals who received college or post-secondary readiness support (e.g., applications, scholarships, textbooks, computers):* In version 2.1, agencies can include both young adults and adults when reporting under a similar service. However, in version 3.0, the service is now listed under the Childcare, Early Childhood, Young Adult Education Services (SRV 2a-g) header. By including it here, agencies will no longer be able to capture similar services for those who are 25 years and older. The recommendation is to relocate SRV 2g. to a standalone header, as it is currently, allowing agencies to capture the college or post-secondary education readiness supports to all who receive it, regardless of age.
- *SRV 5d. The number of older adults who received healthcare payment assistance (e.g., prescription payments, doctor visit payments):* The inclusion of “older adults” in the service language is limiting. To allow for maximum reporting of what services are being provided by the CSBG network, it should be revised to: The number of **individuals** who received healthcare payment assistance (e.g., prescription payments, doctor visit payments).
- *SRV 5i. The number of older adults who received a home visit (e.g., nursing, chores, personal care services):* Again, the inclusion of “older adults” in the service language is limiting. To allow for maximum reporting of what services are being provided by the CSBG network, it should be revised to: The number of older adults **and individuals with disabilities** who received a home visit (e.g., nursing, chores, personal care services).
- *SRV 5q. The number of individuals who received prepared meals (e.g., through a congregate nutrition site, Meals on Wheels, a prepared food delivery or pickup program):* This is a service that may create challenges in obtaining an unduplicated count. NASCSP recommends that it be revised to: The number of prepared meals

provided (e.g., through a congregate nutrition site, Meals on Wheels, a prepared food delivery or pickup program).

- *SRV 5r. The number of individuals who received food distribution services (bags, boxes, food share, groceries):* This is a service that may create challenges in obtaining an unduplicated count. NASCSP recommends that it be revised to: The number of food distribution services **provided** (bags, boxes, food share, groceries).
- *SRV 5v. The number of individuals accessing hygiene utilization services (e.g., showers, toilets, sinks, laundry facilities) to individuals and families:* This is a service that may create challenges in obtaining an unduplicated count. NASCSP recommends that it be revised to: The number hygiene utilization services **provided** (e.g., showers, toilets, sinks, laundry facilities) to individuals and families.
- *SRV 5w. The number of individuals who received clothing assistance:* This is a service that may create challenges in obtaining an unduplicated count. NASCSP recommends that it be revised to: The number of clothing assistance **provided**.

Module 3, Section B Individual and Family NPIs

NASCSP acknowledges that OCS has made several changes to this section based on feedback received from the 60-day comment period, including: the addition of obtaining employment indicators, the rephrasing many indicators to include outcome language, creation of the service delivery and access section, the addition of new transportation services, and the addition of allowing an agency to include another FNPI. There are a few changes that NASCSP believes will improve the quality and clarity of what is being collected.

Recommendation

*When a wording change is recommended, the revised language is listed in **bold, underlined font**.*

- *Other Indicators:* It appears that agencies are only allowed to add one other indicator. NASCSP recommends that this be increased to four as it is with the current report. This would allow maximum flexibility for reporting and help inform future versions of the CSBG Annual Report.
- *FNPI 2f. The number of individuals who increased their education through enrollment in a post-secondary degree program (e.g., associates, bachelors, etc.):* The phrase “increased their education” does not match the remainder of the indicator. One cannot increase education through enrollment alone. Enrollment is an output that may lead to the outcome of improved education. The current language of the indicator is an output masking as an outcome, which decreases its clarity. NASCSP recommends revising the language of the indicator to: The number of individuals **who are working to increase** their education through enrollment in a post-secondary degree program (e.g., associates, bachelors, etc.).

- *FNPI 5a. The number of individuals served who then improved their health and well-being through preventative measures:* The indicator's language is inconsistent because a majority of indicators do not use the phrase "served who then." NASCSP recommends that it be revised to: The number of individuals who improved their health and well-being through preventative measures.
- *FNPI 5f. The number of older adults (age 65+) with increased access to home visiting services:* As this is limiting, NASCSP recommends that the indicator be revised to: The number of older adults (age 65+) **and individuals with disabilities** with increased access to home visiting services.
- *FNPI 5g. The number of older adults (age 65+) who maintained an independent living situation:* FNPI 5g. As this is limiting, NASCSP recommends that the indicator be revised to: The number of older adults (age 65+) **and individuals with disabilities** who maintained an independent living situation.
- *FNPI 5h. The number of individuals served who then improved their mental health, behavioral health or well-being:* The indicator's language is inconsistent because a majority of indicators do not use the phrase "served who then." NASCSP recommends that it be revised to: The number of individuals who improved their mental health, behavioral health or well-being.
- *FNPI 5i. The number of adults served who then improved their oral health:* The indicator's language is inconsistent because a majority of indicators do not use the phrase "served who then." NASCSP recommends that it be revised to: The number of adults who improved their oral health.
- *FNPI 5j. The number of children served who then improved their oral health:* The indicator's language is inconsistent because a majority of indicators do not use the phrase "served who then." NASCSP recommends that it be revised to: The number of children who improved their oral health.
- *FNPI 7a. The number of individuals who achieved one or more outcomes in the identified National Performance Indicators in one or more domains (version 2.1):* There are some in the network that support the removal of this indicator while others do not. As the list of indicators is only a menu of options, including FNPI 7a. (version 2.1) would not increase the reporting burden. CSBG eligible entities will have the option of reporting on it. NASCSP recommends adding this indicator back into version 3.0. Since the Multiple Domains is no longer a domain, NASCSP recommends that OCS use a similar strategy as it did with the Service Delivery and Access services. It could be under a new section prior to the Employment Indicators entitled Number of Individuals Achieving One or More Outcomes with the indicator listed. NASCSP also acknowledges that FNPI 7a. has posed a significant challenge because it is not always being reported accurately and consistently. It will be important that additional training and technical assistance be provided to address these issues.

Conclusion

NASCSP appreciates the work OCS has done to update the CSBG Annual Report v.3 between the 60-day and 30-day comment periods. While progress has been made, there are several revisions that are needed to help with the quality and clarity. Additionally, there are concerns about the estimated time burden for two sections over Module 1 that needs to be clarified.

Additionally, NASCSP continues to advocate for more substantial involvement from the CSBG network to ensure the CSBG Annual Report not only meets the federal accountability and performance mandate, but it is created by those that responsible for data collection, mainly the CSBG lead agencies and CSBG eligible entities, and that the CSBG Annual Report truly highlights the Network's efforts to change lives and improves communities and minimizes the data collection and reporting burden.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl Williams", written in a cursive style.

Cheryl Williams
NASCSP Executive Director