



NASCSP

NATIONAL ASSOCIATION FOR STATE COMMUNITY SERVICES PROGRAMS

November 26, 2019

Administration for Children and Families
Office of Planning, Research, and Evaluation
330 C Street SW
Washington, DC 20201
Attn: OPRE Reports Clearance Officer

Dear OPRE Reports Clearance Officer,

Thank you for the opportunity to comment on the continued information collection of the Community Services Block Grant (CSBG) Annual Report (OMB No.: 0970-0492). We, the National Association of State Community Services Programs (NASCSP), appreciate the ability to actively participate in this process on behalf of our state members and through our current cooperative agreement, Performance Management System Development and Data Collection Analysis and Reporting for the CSBG Program, with the Office of Community Services (OCS). As a training and technical assistance provider and membership organization for State Administrators of both the CSBG and Weatherization Assistance Program, NASCSP continues to applaud and actively support the federal investment and national commitment to reducing poverty in our nation that the CSBG and weatherization programs represent.

In concert with our state members, we have reviewed the edits to the CSBG Annual Report to identify both strengths and opportunities for improvements. Our comments are provided below in response to the feedback requested in the Federal Register:

- a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility;
- b) The accuracy of the agency's estimate of the burden of the proposed collection of information;
- c) The quality, utility, and clarity of the information to be collected; and
- d) Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

The following comments outline the core areas NASCSP would recommend OMB and OCS consider when finalizing updates to the CSBG Annual Report:

(a) Necessity for the Performance of the Functions of the Agency

We believe that collecting the information in the CSBG Annual Report through Modules 1-4 is necessary to the work of OCS. This report fulfills the CSBG Act requirements (CSBG Act, Sec. 678E) which instructs local agencies, State Offices, and OCS to report on the work of the CSBG Network. NASCSP supports the minor edits to Modules 2-4 and will look forward to the opportunity for input on more substantive content changes to the report in a future clearance process.

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(b) Accuracy of the Agency's Burden of the Proposed Collection of Information

NASCSP thinks the burden should still generally apply to both State Offices and CSBG Eligible Entities, although the decrease in the number of current entities should be taken into consideration. The burden estimate cites a three-year average based on time spent for both State Offices and Eligible Entities collecting and entering data and participating in training and technical assistance. State Offices are in year four of reporting and CSBG Eligible Entities are in year two. Even in year four, State Offices continue to have a heavy reporting burden, and the additional questions proposed in this clearance package will erase any capacity gained over the past three years. While the reporting burden for States should remain the same, the burden estimate for eligible entities should be adjusted to account for fewer CSBG Eligible Entities. The burden as written in the Federal Register is an estimate for 1,035 entities; however, the most recently published Report to Congress (FFY2015) has 1,026 entities and the most recent data reports 1,018 entities. The CSBG Eligible Entity burden should be adjusted from 250,585 hours to 246,469 to account for the fewer number of agencies.

(c) Quality, Utility and Clarity of Information to be Collected

NASCSP believes that the following items in the proposed OMB Clearance documents should be addressed during this comment period:

Module 1, A.2: Programs administered by the State CSBG Lead Agency during the reporting year:

NASCSP suggests that additional programs be added to this list. We think it is important to have critical programs such as SNAP, TANF, Head Start/Early Childhood Education, CDBG, SSBG, and DOL programs added to the list. As States embark on working with their networks on Human Capacity and Community Transformation (HCCT) work, this data would provide State Offices valuable insight into service coordination and leveraging opportunities to advance the mission of CSBG. We understand that there is an option to select 'Other' in the A.2 list; however, because the data is entered into a text box, it is not easy to organize, analyze, and use.

Module 1, D.2: Organizational Standards Performance:

NASCSP supports the addition of reporting on the number of Entities that met less than 69% of the Organizational Standards.

Module 1, D.3: Technical Assistance Plans for Unmet Organizational Standards:

NASCSP supports moving reporting on QIPs out of the Organizational Standards section and only reporting on QIPs under Corrective Action.

Module 1, Section E: State Use of Funds:

The data collected for this report are used to prepare the required report to Congress that among other things describes how CSBG funds were actually spent by the states and CSBG Eligible Entities. It is worth noting that Congress has authorized States to have 24 months to expend CSBG funds. This section and the following section of the annual report have historically provided information that helps provide a picture of how States and CSBG Eligible Entities are utilizing CSBG funds in a given fiscal year which means States and CSBG Eligible Entities may be using funds from the previous and current fiscal award. We believe it benefits Congress and other stakeholders to have this annual picture and a reasonable level of detail about funds spent from the previous federal awards, the current year award, and funds carried forward.

NASCSP believes the proposed changes to Section E do not fully account for the complexities of multi-year state spending authority and may result in less useful information for Congress and other stakeholders than has been available historically. The proposed changes to this section will create confusion, degrade data reliability, and reduce the overall usefulness of the data for analysis and improvement. We believe that with additional conversation and collaboration with states and CSBG Eligible Entities, changes can be identified to enhance and streamline data collection for this section.

NASCSP suggests that no changes be made to Section E this year, but rather for OCS to form a stakeholder committee to consider what changes are needed for this section and propose the findings from the committee in the next OMB Clearance process.

The following specific items should be considered when proposing changes to Section E:

- It does not appear that carry-over issues have been fully considered in the proposed changes. Carry-over is mentioned as a part of the federal funds awarded “in this fiscal year”, but carry-over is funding from a previous fiscal year, and it appears the proposed changes do not intend carry-over to be included/reported.
- The CSBG Annual report includes the number of individuals and families served and outcomes achieved for the year. These outcomes and services are made possible with CSBG funds awarded to states in the current year as well as funds carried over from the previous year. As such, the financial information collected in the annual report should provide a complete picture of all the CSBG funds used in the year and not just the current year award.
- As part of U.S. Department of Health and Human Services (HHS) grant policy, States are required to report financial information to HHS using Federal Financial Report (SF-425). We believe the information provided in the CSBG Annual Report should not duplicate information available in SF-425, but rather provide additional information and context to help Congress and other stakeholders understand how CSBG funds were spent and what was achieved. If the intent of the proposed changes to Section E are to align with the SF-425, then OCS should consider inclusion of the SF-425 as an attachment to Module 1 and then ask States to provide additional information that is needed and not available on the SF-425.
- E.2: The phrase “while the CSBG State Plan allows for either percentage or dollar amounts” needs to be changed because the new CSBG State Plan only allows for dollar amounts.
- E.2: OCS needs to further define the terms “allocated” and “obligated” for the network.
- E.4: The proposed language is unclear. There needs to be more clarification on what “formally committed for procurement or direct expenditure” means. It is unclear whether this includes any indirect money. It is also unclear as to whether all state administration would be considered obligated. Most state administrative funds are simply expended rather than obligated.
- E.10: This is a new section. There needs to be additional clarity and guidance on what “unobligated balance” means and whether this is equivalent to “carry-forward.” It is also unclear where E.10.d “total” is being auto-populated from. There appears to be a typo in the language in the chart and the auto-population should occur from E.9 rather than E.10, though it is unclear if that is true.

Module 1, Section H: Monitoring, Corrective Action, and Fiscal Controls:

The following specific items should be addressed in Section H:

- H5: NASCSP disagrees with the addition of reporting on TAPs under the heading of Corrective Action, Termination, and Reduction of Funding and Assurance Requirements. TAPs are already

reported on in Section D of Module 1 and it is unnecessary to duplicate reporting on TAPs in this report.

- H.5b. NASCSP recommends striking this. There is no requirement or timeframe in the CSBG Act or other guidance that requires States to report to OCS the number or name of Eligible Entities that are on TAPs. It is also unclear what the language “serious deficiency” means in relation to TAPs.
- While NASCSP recommends removal of TAPS from this section, if it is unavoidable to address training and technical assistance in this section of the report due to its inclusion in the CSBG Act, then NASCSP recommends including the following question: “Did the State provide training and technical assistance to all agencies with deficiencies identified during monitoring as required in the CSBG Act?” This allows OCS to identify if states are fulfilling their obligation to provide training and technical assistance to agencies with deficiencies while continuing to allow for TAPs to be reported only under Organizational Standards.
- H.6: The addition of the question “did the state have single audits in the federal clearinghouse during the reporting period” does not make sense. All CSBG Eligible Entities who meet the threshold to complete a Single Audit should submit their audit to the Federal Audit Clearinghouse and States should list all the audits in the table in H.6 that were submitting during the reporting period. If there are audit findings or questioned costs in an eligible entities audit, then a state management decision should be issued by the State and noted in the chart. It should further be monitored by OCS if the management decision was issued six months from the Federal Audit Clearinghouse acceptance date. This question is intended to align with State Accountability Measure 4Sd that identifies the six-month timeline and the general expectation of States.

(d) Ways to Minimize the Burden of Collection

NASCSP believes that continued training of states and CSBG Eligible Entities will help to alleviate the reporting burden over time. Additionally, commitments to technology and interoperability efforts at the federal level will help to ease the reporting burden. NASCSP supports the work of OCS in making this report available to states in an online format and looks to continue supporting OCS in ongoing efforts to improve the system. Additionally, we believe that addressing our provided comments on Module 1 would help further minimize the collection burden on States.

Conclusion

NASCSP appreciates the work of OCS in aligning Module 1 with the CSBG State Plan and correcting minor errors in Modules 2-4. All of this work is to be applauded. As the member association for all of the CSBG State Grantees, we also feel that addressing the feedback we have provided in this document is critical to the success of States’ implementation of the CSBG Annual report. We look forward to continuing to work with OCS to improve and strengthen the report.

Sincerely,



Willie Fobbs, President
Board of Directors