



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of Community Services | 330 C Street, S.W., Washington, DC 20201
www.acf.hhs.gov/ocs

Community Services Block Grant

Dear Colleague Letter

DCL#: CSBG-DCL-2020-10
DATE: January 27, 2020
TO: CSBG Network
SUBJECT: CSBG Annual Report: 30 Day Open Comment Period
ATTACHMENT(S): CSBG Annual Report; CSBG Annual Report Revisions Summary

Dear Colleagues,

The Office of Community Services (OCS) requests feedback from the Community Services Block Grant (CSBG) Network on the proposed revision of the CSBG Annual Report. On January 22, 2020, the Office of Management and Budget (OMB) published the second notice for public comment on the CSBG Annual Report, which is available [here](#).

As described in the notice, send written comments and suggestions directly to the Office of Management and Budget, Paperwork Reduction Project:

OIRA_SUBMISSION@OMB.EOP.GOV

Attn: Desk Officer for the Administration for Children and Families

As noted, “OMB is required to make a decision concerning the collection of information between 30 and 60 days after publication of this document in the Federal Register. Therefore, a comment is best assured of having its full effect if OMB receives it within 30 days of publication.”

CSBG Annual Report Revisions Based on 60-Day Open Comment Period

On October 10, 2019, OCS announced the new clearance for the CSBG Annual Report and the start of the *60-Day Open Comment Period*. During the *60-Day Open Comment Period*, OCS received four sets of comments from national organizations, state CSBG lead agencies, and state Community Action Associations.

OCS organized the comments by Module and question¹, and carefully considered each one. The following summarizes the comments, and the OCS response and revision(s), as applicable.

- **Module 1, Question A.2**

Commenters expressed the value of adding “critical programs” to the list of response options, including “SNAP, TANF, Head Start/Early Childhood Education, CDBG, SSBG, and Department of Labor (DOL).”

OCS Response and Revision(s): After consideration and analysis of previous submissions, OCS added SSBG (another OCS program) and DOL. While OCS agrees that all of these are critical programs, OCS does not currently report on this information at the state-level, and the number of state CSBG lead agencies also administering these additional programs is low.

OCS agrees that these are critical programs and that it is important to continue collecting this information at the department level (Department of Agriculture, Department of Housing and Development, Department of Labor) rather than each individual program (SNAP, TANF, etc.). OCS will continue to receive this information for each individual program at the local-level.

- **Module 1, Question D.2**

Commenters expressed support for the proposed changes, but requested more information on why the proposed changes were made.

OCS Response and Revision(s): OCS made additional revisions to D.2, including asking for information about exempt eligible entities (information that is provided in the CSBG State Plan), and reformatting how the information is collected. OCS made these revisions to promote the submission of accurate data and support continuous improvement.

- **Module 1, Questions E.2, E.4, E.7, E.9, and E.10**

Commenters expressed concern to the current changes to Section E, primarily in that 1) “...without clarification regarding the inclusion will dilute the purpose of the Annual Report to serve as an accurate reflection of the Community Action Network’s performance” and 2) that carryover funds are not included in the proposed revisions, and that ultimately “[the] integrity of the report will be compromised if spending and demographic outcomes are misaligned”.

OCS Response and Revision(s): OCS revised E.2, E.4, and E.7 to include carryover expenditures from the prior FFY. OCS did not revise E.9 and E.10, and maintain that this is the correct way to collect the information in order to ensure accuracy and

¹ In the case that there were multiple comments about one question, OCS reviewed these comments together prior to making revisions.

integrity of the reporting of CSBG funds. OCS will host webinars to provide further clarity and training and technical assistance on all revisions.

- **Module 1, Questions H.4 – H.5**

Commenters expressed concerns with adding a question about Technical Assistance Plans (TAPs) to the monitoring section, as it is duplicative to a prior section (Section D) and that it would be better suited to ask a general question “to address T/TA provided in connection with a QIP”. Furthermore, commenters recommended adding “a threshold question” if this set of questions are not applicable to the state. Lastly, commenters noted that there is no requirement for states to submit this information and it is duplicative of what is asked in a prior section.

OCS Response and Revision(s): OCS revised the order of these two questions so that information is first requested for TAPs (H.4) and then QIPs (H.5). OCS also revised the language from “serious deficiencies” to “issues of noncompliance.”

Ultimately, OCS maintains that it is important to ask about TAPs in the monitoring section of the CSBG Annual Report. While there is no requirement that states provide this information to OCS, OCS believes that this information is valuable in providing training and technical assistance to states to promote continuous improvement. Additionally, this question is not duplicative of the prior section. In the prior section, the question asks about TAPs as they directly relate to Organizational Standards, while in this section, the question is about TAPs as they directly relate to monitoring of the eligible entities conducted by the state.

- **Module 1, Question H.6**

Commenters expressed concerns about the addition of a threshold question that allowed states to skip this question as CSBG eligible entities are required to submit their annual audits to the Federal Audit Clearinghouse (FAC). Therefore, states should never skip this question.

OCS Response and Revision(s): OCS removed the threshold question, and revised the table to better align with the requirements as specified in 2 CFR 200.331 and 2 CFR 200.501. The revisions will encourage the states to meet their own requirements, but skip the question if they have nothing to report at the time of submission. This is based on the fact that the requirements specified in the 2 CFR 200.331 and 2 CFR 200.501 are on CSBG eligible entities, and not the state.

- **Module 4, Section C – Education Level**

Commenters expressed concerns with the addition of “GED/Equivalency Diploma” as this information was not previously collected in 2019, and systems will have to be updated in order to account for this change.

OCS Response and Revision(s): No revisions were made. OCS maintains that it is important to include this information in the current collection of reporting. OCS will work with the CSBG Network during the FY2019 CSBG Annual Report submission period in order to account for the fact that this information may have not been collected during FY2019.

- **Module 4, Section C – Military Status**

Commenters expressed concerns with the addition of “N/A – Not Applicable” indicating that 1) the meaning is unclear and could be misinterpreted, 2) this information was not previously collected in 2019, and 3) systems will have to be updated in order to account for this change.

OCS Response and Revision(s): OCS revised the language to “Never Served in the Military” to better align with other government forms that ask a similar question. OCS maintains that it is important to include this information in the current collection for reporting. OCS will work with the CSBG Network during the FY2019 CSBG Annual Report submission period in order to account for the fact that this information may have not been collected during FY2019.

- **Burden Hours**

Commenters requested that OCS review the burden hours as 1) the number of eligible entities had lowered (per the 2015 CSBG Congressional Report) and 2) OCS and the CSBG Network is still implementing the CSBG Annual Report.

OCS Response and Revision(s): OCS increased the burden hours in the second federal register based on these comments. However, OCS believes that as this is not the first year of data collection, the burden is still less than what we estimated in the previous approval. We have updated the burden to be similar, but a little less than previously approved.

Webinars and Training

During the upcoming weeks, OCS will provide training and technical assistance that addresses these revisions, as well as the CSBG Annual Report as a whole. We truly appreciate the efforts of the entire Network as we continuously grow and improve.

Thank you for your attention and OCS looks forward to continuing to provide high quality services to OCS grantees.

/s/

J. Janelle George
Acting Deputy Director
Office of Community Services