

# Talking Points: OMB Clearance of the CSBG Annual Report

## General Comments on the OMB Clearance:

- The CSBG Annual Report was cleared by the Office of Management and Budget in January 2017 with a 3-year approval. That means that it expires on January 31, 2020 -- which is *before* the FY 2019 data is collected by OCS States submit by March 31, 2020.
- An updated clearance is therefore needed before January 2020 to ensure the network can submit their FY 2019 CSBG Annual Report.

## Phased in Approach of Current Clearance:

- Even though the Module 1 data for 2016 and 2017 has been submitted by the State Offices using the OLDC portal to OCS since the original clearance date, local agency data in Modules 2, 3 and 4 *was submitted for the first time* this past April for FY 2018.
- The phased in approach of only submitting Module 1 initially gave the network two years to build systems, offer training on the new data elements, and build capacity to submit Module 2-4 data for FY 2018.
- During the preparation for submitting this data we know that local agencies, State Community Action Associations and State Offices identified some issues and areas where clarification and/or modification would be useful.

## OMB Clearance, Phase I:

- To meet the need for a January 2020 clearance, however, **OCS is submitting an updated package to OMB, which is focused on technical updates only.**
- While there will be the 60-day and 30-day comment periods open for anyone in the network to respond to the clearance package, OCS will focus on technical items such as correcting typos, adding clarifications, and aligning Module 1 with the most recent State Plan format.
- A notice will be sent to the network when the package has been posted in the Federal Register. This is being called “**Phase I**” and will allow continued collection and reporting of the same data points that are in the currently cleared Annual Report for the near future.
- This means the network does not need to rush to change state and local agency systems and processes in the short time frame available leading up to March 31, 2020.

## OMB Clearance Phase II:

- The more substantive changes to Modules 2, 3 and 4 that the network feels are needed will be addressed in the next OMB Clearance process (to be identified as “**Phase II**”) which is projected to begin early 2020. **That is when extensive input on any proposed content is expected and welcomed.**

- All the national partners will be reaching out to secure feedback to be sure that OCS has all of the data they need to inform any changes or modifications to the Annual Report.
- Discussion about the challenges and the solutions to those challenges will be shared through various communication channels.

**Submitting General Feedback:**

- Be on the look-out for more information about how to submit your feedback and the feedback you hear from your peers to inform the Phase II clearance.
- In the meantime, you can continue to submit your feedback on Modules 2-4 to NASCSP [here](#).