

CSBG SUPPLEMENTAL REPORTING UPDATES

Tuesday, January 19, 2021

2:00-3:00pm ET



Agenda

- Supplemental Reporting: What We Know
 - Proposed Reporting
- Data submission
- DATA Task Force
 - Recommendations to OCS
- NASCSP Comments to OMB
- Executive Order
- Organizational Standards



Supplemental Reporting: What We Know

Proposed

- Office of Community Services (OCS) proposed reporting requirements for the new CSBG CARES Act Supplemental and CSBG Disaster Supplemental funding
 - CSBG Supplemental Annual Reports include modified versions of Modules 1, 2, and 4.
 - Respondents only submit Module 3 once through the regular CSBG Annual Report.
- OCS did make a point to want to reduce reporting burden



ADMINISTRATION FOR
CHILDREN & FAMILIES
Office of Community Services

OMB #0970-0492
Expiration Date: 02/28/2023

Community Services Block Grant CARES Supplemental Annual Report

THE PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13): Public reporting burden for this collection of information is estimated to average 107 hours per grantee and 493 per sub-grantee per response, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Supplemental Reporting: What We Know

Proposed

Modules 1-3

- Module 1 will be simplified and focus on CSBG CARES & Disaster:
 - Includes allocations to eligible entities
 - State usage of CARES & Disaster funds
 - Report out on CARES State Plan
 - Lessons learned
- Some information will not be required in CARES & Disaster. Example: Module 2 Section B removed for CARES and Disaster
- Module 3 will be reported in the same way. The only change is that it will have a dropdown for choosing the funding source (CSBG, CARES, Disaster).

Module 3, Section A: Community Transformation Status Form

Name of CSBG Eligible Entity Reporting:	
State:	DUNS:
Does this include CSBG funds?	Yes or No
Does this include CSBG CARES Supplemental funds?	Yes or No
Does this include CSBG Disaster Supplemental funds?	Yes or No
Reporting Status:	New, Previously Submitted
	Use the dropdown menu to select the response where appropriate.
1. Transformation Name	
2. Transformation Year	1-7+ years
3. Problem Identification	Narrative

Supplemental Reporting: What We Know

Proposed

Module 4

- Not many changes; M4 is focused on outcomes, services, and people
 - One of the main changes is in reporting the NPIs. For example, columns 2-5 with targeting has been removed to focus on individuals served
 - Many sections are greyed out to keep the general structure the same to adapt these forms within the existing data systems and structures

Module 4, Section A: Individual and Family National Performance Indicators (FNPIs) - Data Entry Form					
Goal 1: Individuals and Families with low incomes are stable and achieve economic security.					
Employment Indicators					
Name of CSBG Eligible Entity Reporting:	DUNS:				
State:	I.) Number of Individuals Served in program(s) (#)	II.) Target (#)	III.) Actual Results (#)	IV.) Percentage Achieving Outcome [(III/I) = IV] (%) auto calculated)	V.) Performance Target Accuracy [(III/II) = V] (%) auto calculated)
Employment (FNPI 1)					
FNPI 1a The number of unemployed youth who obtained employment to gain skills or income.					
FNPI 1b The number of unemployed adults who obtained employment (up to a living wage) .					
FNPI 1c The number of unemployed adults who obtained and maintained employment for at least 90 days (up to a living wage) .					
FNPI 1d The number of unemployed adults who obtained and maintained employment for at least 180 days (up to a living wage) .					
FNPI 1e The number of unemployed adults who obtained employment (with a living wage or higher) .					
FNPI 1f The number of unemployed adults who obtained and maintained employment for at least 90 days (with a living wage or higher) .					
FNPI 1g The number of unemployed adults who obtained and maintained employment for at least 180 days (with a living wage or higher) .					

Supplemental Reporting: What We Know

Annual Burden Estimates

Instrument	Total number of respondents	Total number of responses per respondent	Average burden hours per response	Total burden hours	Annual burden hours
CSBG Annual Report (States)	52	3	198	30,088	10,029
CSBG Annual Report (Eligible Entities)	1,009	3	697	2,109,819	703,273
CSBG CARES Supplemental Annual Report (States)	52	3	107	16,692	5,564
CSBG CARES Annual Report (Eligible Entities)	1,009	3	493	1,492,311	497,437
CSBG Disaster Supplemental Annual Report (States)	15	3	95	4,275	1,425
CSBG Disaster Supplemental Annual Report (Eligible Entities)	50	3	476	71,400	23,800

Estimated Total Annual Burden Hours: 1,241,528.

Proposed Reporting Timeline

CSBG ANNUAL REPORT FY20

Due: April 30 2021

- Will include CARES and Disaster
- Module 3 will include an option to report on community-level work that was funded through CSBG CARES and Disaster
- No proposed changes to Modules 1, 2, 4

CSBG CARES SUPPLEMENTAL REPORT

Due: May 30, 2021

- Proposed reporting of Modules 1, 2, 4
- Module 2 would not include Section B (Agency Capacity)
- Module 4 would not include targets or outcomes in Section A
- Module 4 would require reporting on people, services, and outcomes that were funded by CSBG CARES

CSBG DISASTER SUPPLEMENTAL REPORT

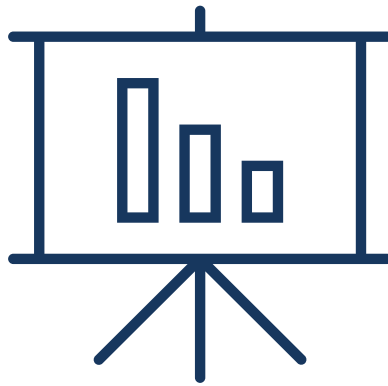
Due: May 30, 2021

- Proposed reporting of Modules 1, 2, 4
- Module 2 would not include Section B (Agency Capacity)
- Module 4 would not include targets or outcomes in Section A
- Module 4 would require reporting on people, services, and outcomes that were funded by CSBG Disaster funds

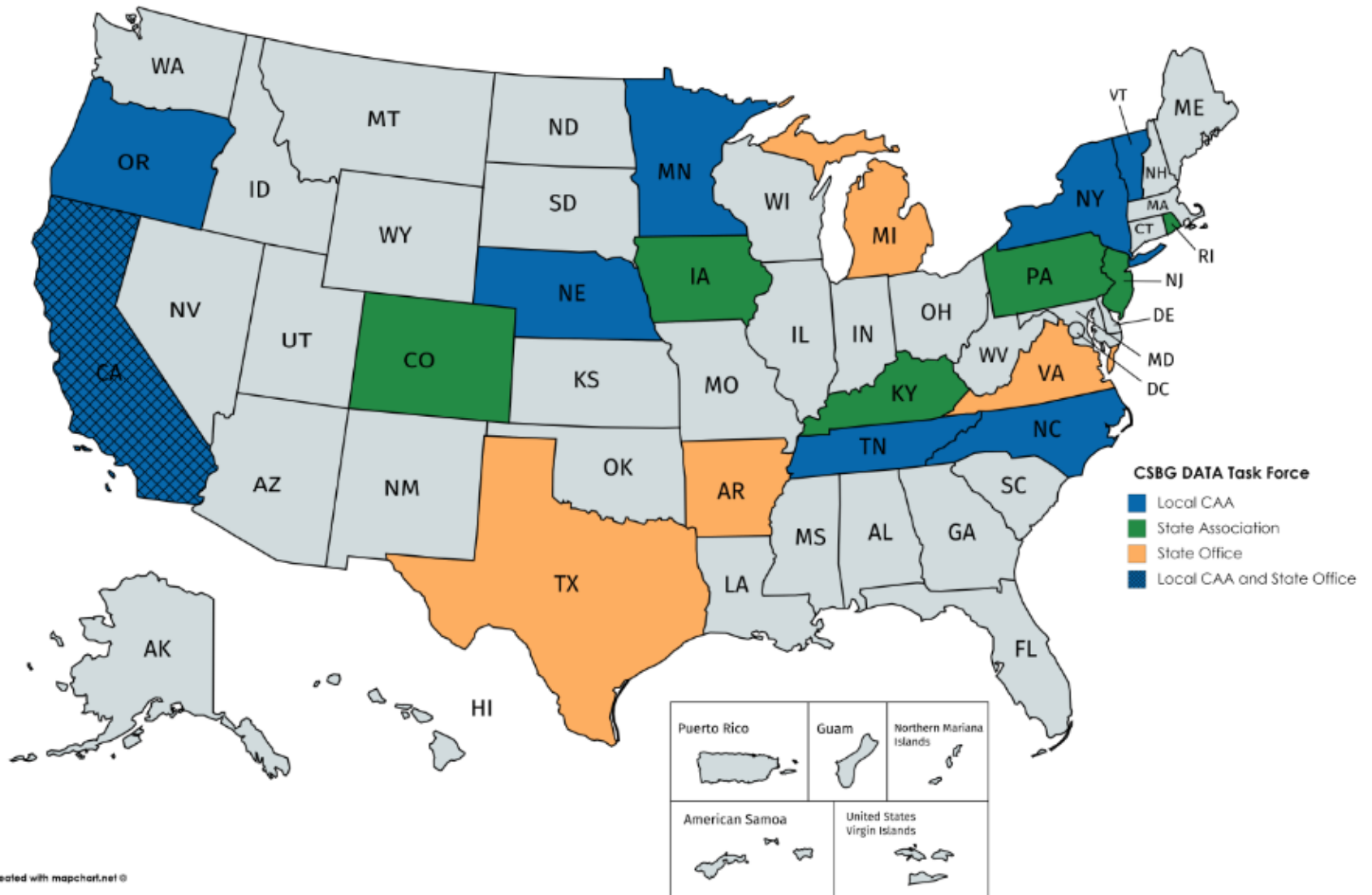
Data Submission – Supplemental Reports - Proposed

- Due to time constraints, OCS is considering asking all eligible entities to use “SmartForms” to submit the first CSBG CARES and CSBG Disaster Supplemental reports
- DATA Task Force recommends that CARES and Disaster reports be submitted through normal submission processes
 - States would receive SmartForms for supplemental reporting
 - States with data systems could use their regular system

DATA Task Force



DATA Task Force Members



DATA Task Force



What is the CSBG DATA Task Force?

The CSBG DATA Task Force is convened by the National Association for State Community Services Programs (NASCSP) to assist the Office of Community Services (OCS) and NASCSP in understanding and addressing the CSBG Network's data needs and the use of data for analysis and continual improvement of results. The CSBG DATA Task Force will serve as a consultative body focused on the transition from the CSBG IS Survey to the CSBG Annual Report, as well as ongoing assistance in the implementation of the CSBG Annual Report. The task force consists of representatives from Community Action Agencies, State CSBG Offices, Community Action Agency State Associations, National Partner organizations, and OCS.

**DATA Task Force
Member Login HERE**

Updates

The DATA Task Force will post periodic status reports updating the network on accomplishments, resources under development, major projects, etc.

• [Update from August 8, 2018 DATA Task Force Meeting](#)

Member Roster

You can view a roster of the DATA Task Force Members [here](#). Consider contacting a DATA Task force member from your region if you are in need of guidance or resources.



DATA Task Force Subcommittees

- Guidance and Training Subcommittee
 - This subcommittee is focused on developing guidance and training resources to be utilized by all levels of the network. The subcommittee has already developed several tools available on NASCSP's website [here](#). A major deliverable under development by this subcommittee is a comprehensive Lexicon to supplement Annual Report instruction manuals.
- Systems IT Subcommittee
 - This subcommittee is focused on helping the CSBG network develop the systems and IT infrastructure needed to implement the CSBG Annual Report. Major deliverables for this subcommittee include an RFP toolkit and data dictionary.

CSBG

Services and Technical Assistance

CSBG Resources

> Data Collection and Reporting

Annual Report

> DATA Task Force

CSBG IS Survey

National Report and State Fact Sheets

Advocacy

NASCSP Data keeps its members, the federal government, and other interested parties informed about issues related to CSBG and WAP through its publications and training.

[FIND A PROVIDER](#)

[MEMBER LOGIN](#)



DATA Task Force

- The DATA Task Force convened in December & January to respond to OCS's proposed strategy for supplemental reporting
- OCS requested feedback in the following areas:
 - 1) Eligible Entity Data Capacity and Analysis
 - 2) State Data Systems, Oversight and Analysis
 - 3) Telling the CSBG Supplemental Story
 - 4) Other Concerns and Recommendations



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DATA Task Force - Recommendations

- Incorporate CARES and Disaster reporting into the regular submission of the CSBG Annual Report rather than reporting separately
 - This will prevent extra burden and maintain integrity and accuracy of data
 - Separate reporting is not feasible for all entities
 - Reporting solely on the people, services, and outcomes supported by CARES or Disaster funding would not show a clear picture of impact
- Use previous CSBG Annual Reports to compare the reports and show impact of CSBG CARES and Disaster investments



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DATA Task Force - Recommendations

- Module 2 Adaptation to the regular CSBG Annual Report:
 - Add an expenditure chart for each supplemental fund to Section A.
 - Keep Section B.
 - Add a CARES and Disaster data point to Section C, C.2 “Amount of FYX CSBG allocated to reporting entity”.
 - Add a CARES column to Section C, C.3 “Federal Resources Allocated”.
 - Expand Section A, A.4.1 and identify this as a place where agencies can provide a narrative on how they used CSBG to alter their offices for touchless services, purchase of PPE, remote workstations, etc.

DATA Task Force - Recommendations

- Module 4 Adaptation to the Regular CSBG Annual Report:
 - Add the following services to Section C: Cash Assistance, PPE, and ten rows for “Other Services” to be written in by the local agency in order to provide flexibility in reporting services that are specific to COVID related issues.
 - Add a service count section to Section C for the following services: boxes of food, pounds of food, hygiene kits, referrals and amount of housing (rent or mortgage) payments.

NASCSP Comments to OMB

- Collecting information on CARES and Disaster impact is necessary, but it is not necessary that it be collected through separate reports
 - Separate reports would create great administrative burden and risk data inaccuracies
- Reporting on a single funding stream does not make sense for CSBG because CSBG is not a program. It is a strategy that supports, coordinates, and leverages all work of the entity.

January 19, 2020

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

Dear ACF Reports Clearance Officer,

Thank you for the opportunity to comment on the expedited OMB review and public comment of the Community Services Block Grant (CSBG) Annual Report (OMB No.: 0970-0492). We, the National Association for State Community Services Programs (NASCSPP), have several comments related to the proposed clearance package. In partnership with our state members and other CSBG National Partners, we have reviewed, considered, and discussed the changes to the CSBG Annual Report to identify opportunities for improvements.

NASCSP Comments to OMB

- Module 2, Section B
 - The Supplemental Reports do not ask for data on Eligible Entity Capacity
 - This section has critical information such as volunteer hours and partners that are important in telling the story of CARES
- Module 4, Section A
 - The Supplemental Reports do not ask for the outcomes in the FNPIs to be reported
 - Outcomes achieved by individuals and families represent critical information that OCS needs to inform Congress on how community action programs are outcome focused and achieve results

NASCSP is concerned about the use of proportional analysis in Module 4.

NASCSP Comments to OMB

- NASCSP believes the estimated hours of administrative burden posed by OCS is accurate but unnecessarily burdensome during the COVID-19 crisis



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Data Submission – Regular Report

- FY 19 data is nearly finalized
- States will start to receive SmartForms to collect FY 20 data for the Annual Report in mid-February
 - States will receive the SmartForms in February/March 2020
 - States who have **statewide databases** can use an XML for a direct transfer to OLDC
 - Module 1 will continue to be submitted through OLDC
- These SmartForms will look similar to previous year's forms
 - There are additional questions in Module 3 to report funding source
- Due April 30th

Presidential Executive Order: Expanding Educational Opportunity Through School Choice

- OCS released [DCL-2021-07 Use of Funds Expanding Educational Opportunities](#) which provides guidance on the President's Executive Order [Expanding Educational Opportunity through School Choice](#).
 - The DCL reminds states and local entities that the CSBG Act establishes the authority for grantees to use their CSBG allocations to support emergency learning scholarships and supports as outlined in the Executive Order ***if these needs are identified in an eligible entity's local community needs assessment.***
- This order does not supersede the requirement from the CSBG Act that states allocate 90% of their CSBG award to local CSBG eligible entities. CSBG eligible entities are required to use their 90% funds to respond to the unique needs of its community identified in its needs assessment. Federal and state governments do not have the authority to direct how 90% of funds will be used by local CSBG eligible entities. **Thus, this order does not (and cannot) mandate that agencies or states use CSBG funds this way.**

Presidential Executive Order: What Can States Do?

- **The CSBG Act includes provisions that authorize states to allow such expenditures.** These are allowable as long as the need has been identified in the needs assessment.
- **Develop standard messaging for constituent and other inquiries.** Encourage constituents who are low income and in need of financial assistance or other support to contact their local CSBG eligible entity or Community Action Agency for help. CSBG eligible entities may have other programs that the constituent can benefit from.
- **Brief your leadership.** Make sure leadership is aware of the order, its implications, and department actions to respond to inquiries.
- **If necessary, consult your legal counsel.** Depending on your state, verifying your plan of action and messaging with legal counsel may be appropriate.
- **Support your agencies.** Ensure your agencies are aware of the order and are prepared to respond to inquiries from constituents and others.

Organizational Standards



- CSBG Working Group (convened by NCAP) is working to identify Organizational Standards that may need exemptions or flexibilities in response to the Pandemic.
 - Working group is made up of all levels of the network including agencies, states, associations, and national partners.

States have the authority to interpret what “meets” an Organizational Standard.

Questions?



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