



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-2021-13

DATE: May 13, 2021

TO: States and Territories

SUBJECT: CSBG CARES and Disaster Supplemental Annual Report: 30 Day Open Comment Period

ATTACHMENT(S): CSBG Annual Report, CSBG CARES Supplemental Annual Report, CSBG Disaster Supplemental Annual Report

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 April 26, 2021, the Office of Management and Budget (OMB) published the second notice for public comment on the CSBG Annual Report, CSBG CARES Supplemental Annual Report, and CSBG Disaster Supplemental Annual Report, which is available [here](#). Please note: these CSBG Annual Reports are approved. This clearance is specifically to continue collecting the information included in these reports.

As described in the notice, send written comments and suggestions directly to the Office of Management and Budget, [Paperwork Reduction Act](#). Find this information collection by selecting “Currently under 30-day Review—Open for Public Comments” or by using the search function.

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 CARES Supplemental and CSBG Disaster Supplemental Annual Reports Revisions Based on 60-Day Open Comment Period

On December 8, 2020, OCS announced the new clearance for the CSBG CARES Supplemental Annual Report and CSBG Disaster Supplemental Annual Report and the start of the *60-Day Open Comment Period*. During the *60-Day Open Comment Period*, OCS received 15 comments from national organizations, state CSBG lead agencies, and state Community Action Associations.

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

- **Separate Annual Reports**

Commenters expressed concern that having multiple reports “does not properly represent the intended and actual ways that CSBG funding is used by CAAs.”

***OCS Response or Revision(s):** While OCS understands the concern, from the federal perspective, stewardship, oversight, and reporting, OCS believes that it is important to maintain separate reports. OCS is receiving inquiries specifically about the CARES Supplemental funding and Disaster Supplemental funding. Per the terms and conditions in the Notice of Awards, all grantees were required to track these funds separately for future reporting. This also prepares us for possible future supplemental funding and the potential requirement to report and track the funds and services separately, including the intricacies of the Paperwork Reduction Act and adapting systems.*

- **Burden Hours**

Commenters expressed concern that “the reporting approach will unduly burden agencies during a global pandemic without adding useful data demonstrating the specific impact of the Disaster and CARES supplementals.”

***OCS Response or Revision(s):** OCS considered the burden of separate reporting forms versus one reporting form and the longer affect. Combining all reports into one form that meets the requirement to track the funding and services separately, would require everyone to adapt multiple systems (SmartForms, statewide databases, XMLs, and OLDC), and then readapt their systems again once the funding ends. As the supplemental funding is temporary, OCS believes that maintaining the standard forms is important and results in less administrative burden.*

- **Unintended Consequences in Data Reported**

Commenters expressed concern that “data resulting from this approach will be open to easy and harmful misinterpretation that will adversely affect CAAs.”

***OCS Response or Revision(s):** OCS believes this prepares the CSBG Network for possible future supplemental funding and the potential requirement to report and track the funds and services separately, including the intricacies of the Paperwork Reduction Act and*

adapting systems. Rather than adversely affecting the CSBG Network, OCS believes this shows the CSBG Network's ability to adapt and response to an urgent need.

- **Insufficient Data Points for New Reporting Approach**

Commenters expressed concern that “the reporting approach does not provide sufficient data points to capture new, emerging services and outcomes across the CAA network.”

OCS Response or Revision(s): *The CSBG CARES Supplemental and Disaster Supplemental Annual Reports were created to compliment the CSBG Annual Report. In creating the OCS Supplemental Annual Reports, OCS' goal was to not veer too far from the original report. In the next two years, OCS will work with CSBG Network to review the CSBG Annual Report to consider additional data points to capture new emerging services in preparation for a new OMB Clearance.*

However, in the interim, OCS understands the importance of adding a few additional data points specific to preventing, preparing for, and responding to COVID-19. In communication with the CSBG Network and as a result of the comments, OCS made the following revisions:

- Within Section A of Module 2 of the CSBG CARES and CSBG Disaster Supplemental Annual Reports, OCS added a narrative question to allow eligible entities to highlight additional usage of funds that were specific to CARES and Disaster Supplemental funding at the local level.
- For FY2020, OCS will only request Section B of Module 4 for both the CSBG CARES Supplemental and CSBG Disaster Supplemental Annual Reports. However, OCS may request additional information related to Sections A and C for future fiscal years.
- Lastly, within Section B of Module 4 of the CSBG CARES Supplemental only, OCS added the additional data points to allow the states to provide additional CARES specific information:
 - SRV 3r
 - SRV 5a (revised to specify vaccinations)
 - SRV 7p
 - SRV 7q

CSBG Annual Report

This clearance also includes an extension of the regular CSBG Annual Report. OCS revised Module 3 of the regular CSBG Annual Report to include the CSBG CARES Supplemental and CSBG Disaster Supplemental funds. No additional revisions were made to the regular CSBG Annual Report as part of the 60-day comment period. As noted above, OCS will work with the CSBG Network to review the CSBG Annual Report to consider additional data points to capture new emerging services in preparation for a new OMB Clearance.

Webinars and Training

During the upcoming weeks, OCS will provide additional 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 CSBG Network as we continuously grow and improve. OCS will record all trainings and post them on the [OCS webinar page](#).

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

/s/

Charisse Johnson

Director, Division of Community Assistance

Office of Community Services