



N A S C S P

NATIONAL ASSOCIATION FOR STATE COMMUNITY SERVICES PROGRAMS

November 30, 2016

Office of Management and Budget
Paperwork Reduction Project
Attn: Desk Officer for the Administration for Children and Families
725 17th Street NW
Washington, DC 20503

To Whom It May Concern,

Thank you for the opportunity to comment on Federal Register Notice #2016-26336 regarding the proposed Community Services Block Grant (CSBG) Annual Report. Please accept this letter on behalf of the National Association for State Community Services Programs (NASCS). NASCS is the premier national association charged with advocating and enhancing the leadership role of the States in preventing and reducing poverty. We represent State Administrators of the Community Services Block Grant (CSBG) and the Weatherization Assistance Program (WAP). NASCS is a national training and technical assistance provider for the CSBG Network and is the voice for State interests regarding CSBG issues. Additionally, NASCS has been the sole source of National, State and local data on CSBG since 1987. NASCS continues to applaud and actively support the federal investment and national commitment to reducing poverty in our nation through the CSBG and WAP funded activities.

NASCS is currently in the third year of a cooperative agreement with the Office of Community Services (OCS) which aims to improve the quality of data collection, upgrade data collection processes, enhance the use of data in decision making, and increase accountability across the CSBG Network. NASCS appreciates the opportunity to hold an integral role in the development of the CSBG Annual Report and thanks OCS for ensuring this has been a collective, network-driven process. We believe that the proposed CSBG Annual Report will ultimately help showcase robust results achieved by the CSBG Network for individuals, families, and communities with low-incomes. In order to allow for the full scope of reporting, NASCS urges OCS to not only keep the proposed timeline for implementation through several phases, but to also reevaluate the need for additional phases within the report. This will allow the necessary time for training and technical assistance, data collection, and data systems alignments and upgrades. The completion of the CSBG Annual Report will require investments in staff time and resources at the Federal, State, and Community Action Agency (CAA) levels. It is critical to allow sufficient time for the CSBG Network to evaluate not only the content, but also to develop systems for data collection.

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Please consider the following recommendations aimed at ensuring successful implementation:

Phased-In Approach to the Implementation of Module 1: The CSBG Annual Report Revision: OMB Clearance and 30-Day Comment Period CSBG Dear Colleague Letter released by OCS on October 25, 2016 states the CSBG Annual Report process will be implemented in two phases. In Phase 1, States will complete Module 1 in the On-Line Data Collection (OLDC) system for the FY16 and FY17 Annual Reports. In Phase 2, States will submit the full CSBG Annual Report (Modules 1-4) for the FY18 Annual Report. This is a rigorous timeline that will require substantial efforts at the local, State, and National levels.

It is critical that OCS consider a phased in approach for Module 1 that clearly identifies the questions that **must** be answered for the FY16, FY17, and FY18 Annual Reports. Given various reporting periods for each of the States and Territories, varying timelines for completion of the CSBG State Plan, as well as variances in the numbers of CSBG Eligible Entities within each State, States will not be able to answer all of the questions in Module 1 during the first year of implementation. NASCSP urges OCS to allow a phased in approach to the questions in Section B (specifically questions B.1, B.2, and B.3) Section D, and Section I (specifically questions I.2, I.3, I.4, and I.5) of Module 1. Additionally, NASCSP believes targeted guidance will be required to assist States in reporting on the Federal Fiscal Year. In the current CSBG IS Survey, States have the opportunity to complete the report based on their State Reporting Period. Reporting on the Federal Fiscal Year will have the greatest impact on States with reporting periods running from July – June (approximately 6 states) or January – December (approximately 17 states).

State Consultation and Involvement in the Implementation of Module 1: Given the rigorous timeline and complexities of CSBG reporting, NASCSP supports OCS decision to establish a beta testing workgroup comprised of State CSBG Administrators to assist OCS in the development and finalization of Module 1 in the OLDC system. This workgroup will provide invaluable insight into the strengths and problem areas related to the automation of Module 1 reporting.

Ongoing Consultation from the State CSBG Lead Agencies and the full CSBG Network: NASCSP and other CSBG National Partners have supported several workgroups with the common goal of informing the development and finalization of the CSBG Annual Report. NASCSP recognizes that input from the CSBG Network is critical to the development of high quality CSBG data that will support a culture of continuous learning and improvement. We support OCS’ decision to create a CSBG Annual Report Task Force to continue the work of the Information System Task Force (ISTF), comprised of members from local Community Action Agencies, State Associations, Regional Performance Innovation Consortia, State Lead Agencies, and National and Federal Partners to continuously evaluate and improve the CSBG Annual Report.

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Ongoing Training and Technical Assistance: NASCSP appreciates OCS’ recognition of the critical training and technical assistance elements that are necessary to successfully implement the CSBG Annual Report and capture quality, meaningful data. NASCSP supports OCS’ plan for training and technical assistance and looks forward to continued partnership in these efforts.

NASCSP commends OCS for the evolution of the CSBG IS Survey into the CSBG Annual Report and for taking steps to ensure our CSBG Network is fully prepared to move forward in the ever-changing work to prevent poverty. We believe that with the additions of the critical recommendations discussed in this letter the CSBG Network will be well positioned to successfully implement the CSBG Annual Report. We remain a partner in the effort to enhance the accountability and performance of the CSBG Network, as well as providing training and technical assistance to assist and encourage the CSBG Network at every level.

Thank you for considering our feedback. Please feel free to contact us at (202) 624-5850 with any further questions.

Sincerely,

Willie Fobbs, President
NASCS Board of Directors

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