The Office of Community Services (OCS)' Community Services Block Grant (CSBG) pro
revisions to the CSBG Annual Report (Office of Management and Budget (OMB) #097
activity was published in the Federal Register on April 22, 2024 (89 FR 29339). On the
public (to include the CSBG network) to review and provide comment, including the p
3.0), other related revisions (Annual Report 2.1, CSBG Tribal Annual Report, and Annu
materials in a Dear Colleague Letter (ACF-OCS-CSBG-DCL-24-09). During the 60-day c
meeting to see a review of the proposed changes to Annual Report 3.0 and to comm
materials in written public comments in response to the Federal Register Notice.

In total, OCS received 223 responses during the 60-day comment period. These respc
Register Notice and 126 responses during listening sessions. Listening session comme
and 6 substantive chat responses.

The 223 responses yielded 1,799 unique comments, including 1,464 unique commen
unique comments in the listening sessions. Most comments came from eligible entiti
funded eligible entities. Eligible entities, state administrators, state associations, and
(RPICs) submitted comments through polls, verbal, and written modes. Other organiz
and third-party system vendors, submitted comments primarily as written comments
made up less than 50 percent of written comments, but the majority of the poll and v
thirty percent of state administrators and state associations provided comments.

Table 1.1 summarizes the number of comments from each type of organization recei
and chat comments; and written Federal Register Notice comments. It also summariz

Table 1.1.: Summary of Respondent Cat

	Total number of organizations commented	Total number of organizations in the CSBG network	Listening session poll comments	Listening session verbal comments	Listening session chat comments	Written Federal Register Notice comment
Eligible entity	110	999	202	31	5	819
National partner	2	3	0	1	0	102
State CSBG administrative agency	21	58	36	3	2	112
State Association (not an RPIC)	10	37	19	11	0	89
State Association/ RPIC	4	11	16	3	0	128
Vendor	6	N/A	0	0	0	181
N/A (Uncategorized)	3	N/A	6	0	0	33
Total	**156**	**1108**	**7**	**279**	**49**	**1464**

As a result of the comments, OCS made revisions to the instrument with the propose disposition of a requested change accepted, request change not accepted, an alterna requested. A summary of the dispositions are as followed:

- Request Change Accepted: 544
- Request Change Not Accepted: 340
- Alternative Response: 676
- No Change or Response Needed: 239

gram sought public comments on the proposed
0-0492). The notice for this information collection
same day, OCS also published materials for the
proposed revised Annual Report (CSBG Annual Report
ual Report 3.0 Tribal Short Form) and supplemental
omment period, the public was invited to attend a
nent on the revised Annual Report and related

nses included 97 written responses to the Federal
nts included 84 poll responses, 36 verbal responses,

ts in response to the Federal Register Notice and 335
es, who represented about 10 percent of all CSBG-
regional performance and innovation consortium
ations, such as national membership organizations
through the Federal Register Notice. Eligible entities
verbal comments during listening sessions. About

ved through listening session polls verbal comments,
es how many organizations of each type commented.

tegories

Listening session poll comments	Listening session verbal comments	Listening session chat comments	Written Federal Register Notice comments	Total comments
202	31	5	819	1057
0	1	0	102	103
36	3	2	112	153
19	11	0	89	119
16	3	0	128	147
0	0	0	181	181
6	0	0	33	39
7	**279**	**49**	**1464**	**1799**

d changes. The comments results in either a
tive response to address a concern, or no change

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1	Amy Boccadoro	Community Action Committee of the Lehigh Valley, Inc.	With the proposed removal of "Other" from the FNPIs, where will agencies take into account performance indicators that do not fall into neat buckets? I'm including all the "other" FNPIs that our agency reports on. Many of our agency's services do not fit into pre-set FNPIs, such as our Rising Tide Community Loan Fund, Housing Counseling services, food bank and farmer training programs.	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an "other" with requirement of description.
2	Brandon Pollard	IMPACT Community Action Partnership, Inc.	Hello, One additional quick feedback note after hearing much of the verbal feedback on today's session. I think every agency (and likely even different individuals within each agency) have their own favorite indicators or service counts that they would like to see in the 3.0 report and every piece of data currently being collected likely has someone who would strongly advocate for it. However, I very much approve of your overall effort in simplifying the reports even if it means some specific pieces I found value in disappear. If we were to keep everything that someone found significant value in there would likely be no simplification to the	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
3	Mary Mullins	Missouri Ozarks Community Action, Inc. (MOCA)	I see the service SRV7c. Number of individuals receiving non-medical transportation. I guess we could put our Employments transportation under this but I really think this needs to be added employment is important to move out of poverty. My suggestion SRV7c. Number of individuals receiving non-medical transportation.	Alternative Response	OCS acknowledges the importance of this particular service and non-medical transportation is intended to capture transportation to support things like employment. OCS will include this detail in supplemental guides and materials to support the collection of data so it is clear this includes employment transportation.
4	Mary Mullins	Missouri Ozarks Community Action, Inc. (MOCA)	I like the slim down the report but there are things missing like recidivism and a NPI for moving out of Poverty or above 200 percent of poverty. That is kind of the point of our program.	Alternative Response	OCS did not remove the Federal Poverty Level indicator from the revised report. It can be found on page 41 of the instrument. Recidivism is still a formal indicator in the Community Level Transformation Module of the report. Reentry Services were removed due to the historical underreporting as a service across the nation. OCS prioritized the reduction of burden and emphasizes that the removal of the federal requirement does not preclude local agencies from collecting data points for their specific needs.
5	Donna Jo Owen	Missouri Ozarks Community Action, Inc. (MOCA)	Good Morning, I have a comment/suggestion on the Service to Outcome Plan under SRV7 – Transportation Domain. I agree that the services included are concrete supports and very much needed, especially in more urban areas; however, in our very rural areas mobility depends on having a personal vehicle for many of our families but they cannot afford to repair or maintain their transportation. Would or could there be a service added as a concrete support to include this service? Example: SRV7f: Number of individuals receiving automotive maintenance or repairs. (to maintain mobility) Thank you for your consideration	Request Change Accepted	OCS has updated the Transportation Domain to now include a concrete support service for transporation repairs. This update includes all forms of transportation to include the variations in rural and urban communities. (See SRV 7f.)
6	Robin Mills	Delta County Health Department	I am new to the CSBG Annual Report, having just completed my first one. The proposed changes sound reasonable and helpful.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
7	Jenny Larson	Three Rivers Community Action	Many of us have software systems for tracking all the reporting based on the old requirements, so time and expense needed to update the questions needed to report out on them. So I respectfully ask for time and perhaps resources so we can update our information systems.	Alternative Response	Suggest changing to something like "OCS acknowledges that report changes might necessitate changes to information technology systems. To support grant recipients and subrecipients with this change, OCS will provide robust training and technical assistance opportunities. OCS will also provide an on-ramp for reporting with the optional use of Annual Report 3.0 in FY26 before the new report becomes mandatory in FY27. Grant recipients who do not use Annual Report 3.0 in FY26 will report using Annual Report 2.1
8	Jenny Larson	Three Rivers Community Action	My other comment is if you are going to use services to outcome model, really hard for us if multiple services lead to one outcome, worry about duplicated number of people served. Can't simply add services together because potentially some duplicated information.	Alternative Response	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job
9	Dawn Hommer	Community Action Agency of Southern New Mexico	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] I would suggest changing C.1c Gender-Other to be more inclusive. "Othering" has been offensive to some	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
10	Nancy Boudreau	Berks Community Action Program, Inc.	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] While the proposed collection of information is most likely very helpful for proper performance measurement, more time spent on collecting info and measuring perfomance often means less time to actually serve the clients. That is an issue.	Alternative Response	OCS acknowledges this comment and is keenly aware of the burden data collection, analysis, and reporting may have on the CSBG Network. In making suggested edits to Annual Report 3.0, OCS sought to reduce reporting burden to the greatest extent possible. We examined each data point, its utilization, how often it's actually reported, where else it's reported, and how it rolls up nationally, then compared the benefit of collecting each data point to the potential burden of collecting the data at the individual, agency, and grant recipient level. Burden estimates can be
11	Nancy Boudreau	Berks Community Action Program, Inc.	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Yes, collecting additional data does produce significant burden for smaller agencies. I have no idea how to minimize this burden other than hiring a staff person to complete these tasks, which is again an expense we would have a difficult time to do so.	Alternative Response	OCS acknowledges this comment and is keenly aware of the burden data collection, analysis, and reporting may have on the CSBG Network. In making suggested edits to Annual Report 3.0, OCS sought to reduce reporting burden to the greatest extent possible. We examined each data point, its utilization, how often it's actually reported, where else it's reported, and how it rolls up nationally, then compared the benefit of collecting each data point to the potential burden of collecting the data at the individual, agency, and grant recipient level. Burden estimates can be
12	Kate Pielmeier	Downeast Community Partners	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] Yes, the data is absolutely necessary. We have to evaluate our work (ROMA or comparable) on an ongoing basis to determine the efficacy of what we do. We can't begin to evaluate performance without data like these in the Annual Reports.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
13	Kate Pielmeier	Downeast Community Partners	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] It seems like the burden will be the same or possibly less based on what I've heard here.	Alternative Response	OCS acknowledges this comment and is keenly aware of the burden data collection, analysis, and reporting may have on the CSBG Network. In making suggested edits to Annual Report 3.0, OCS sought to reduce reporting burden to the greatest extent possible. We examined each data point, its utilization, how often it's actually reported, where else it's reported, and how it rolls up nationally, then compared the benefit of collecting each data point to the potential burden of collecting the data at the individual, agency, and grant recipient level. Burden estimates can be
14	Kate Pielmeier	Downeast Community Partners	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] I have some concerns about database setups and how we are going to make sure everything is adjusted to reflect these Annual Report changes. For instance, EmpowOR is customizable, and I can edit that to reflect the changes, but I can't necessarily do that with Hancock or ChildPlus. Are there going to be discussions with these database organizations to make sure we are all on the	Alternative Response	OCS acknowledges this comment and emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds cooperative agreements with the National Association of State Community Service Program (NASCSP) to create custom forms with coding so each local agency has a tool to submit the data at no cost to them. Systems used at the local level for reporting are not under the purview of the
15	Kate Pielmeier	Downeast Community Partners	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] None that I can think of right now.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
16	Kate Pielmeier	Downeast Community Partners	[In response to question "The quality of the information to be collected."] I think the quality will improve with this streamlining because the data equity will improve; the fit sounds like it will be about the same, but the certainty will improve. I think the power of the data will increase, and sample sizes might increase in ways that help vulnerable populations.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
17	Kate Pielmeier	Downeast Community Partners	[In response to question "The clarity of the information to be collected."] Good, I think eliminating the subjectivity and possible differences of interpretations will help the data be more consistent and accurate across the nation. Again, it seems like the proposed changes will increase the power of our data.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
18	Kate Pielmeier	Downeast Community Partners	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."] The only aspect of the estimate of the burden of these proposals is the part I cannot control – proprietary database technology. See my comment for #2.	Alternative Response	Suggest changing to something like "OCS acknowledges that report changes might necessitate changes to information technology systems. To support grant recipients and subrecipients with this change, OCS will provide robust training and technical assistance opportunities. OCS will also provide an on-ramp for reporting with the optional use of Annual Report 3.0 in FY26 before the new report becomes mandatory in FY27. Grant recipients who do not use Annual Report 3.0 in FY26 will report using Annual Report 2.1

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
19	Laura White	Texas Department of Housing and Community Affairs	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Our state issues contracts and collects data on a calendar year. Changing all modules of the annual report to follow the FFY will add the burden of collecting data from two local program years (calendar). This process of adding data from two years will require all of our local processes, contracts, and reporting to be updated and/or changed. If we maintain our local calendar year contracts	Alternative Response	OCS acknowledges this comment and emphasizes that the shift to federal fiscal year should not change the way contracts are handled at the local level but rather the reporting of services. To effectively aggregate national data across 53 states and territories, OCS is priotizing using one standardized reporting period. OCS anticipates this will be of minimal burden as we have found through the reporting submitted that all states and agencies receiving other federal funds currently report on a federal fiscal year.
20	Sarah Hasbargen	Southeastern ND Community Action Agency	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] I do appreciate the efforts to reduce FNPIs in consolidating data to make the impact of CSBG as clear and concise as possible. I do feel it is necessary to have robust data collection, particularly showing impact.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
21	Sarah Hasbargen	Southeastern ND Community Action Agency	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] I would like to ask about adding additional gender and race options for collection to better align with how people identify themselves.	Request Change Accepted	OCS has updated the race and ethnicity categories to align with the White Office of Management and Budget directive (SPD-15) on race and ethnic categories for federal reporting.
22	Sarah Hasbargen	Southeastern ND Community Action Agency	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] I also have a question about how we would ensure data would align when reporting does not align with our fiscal year.	Alternative Response	OCS acknowledges this comment and emphasizes that the shift to federal fiscal year should not change the way contracts are handled at the local level but rather the reporting of services. To effectively aggregate national data across 53 states and territories, OCS is priotizing using one standardized reporting period. OCS anticipates this will be of minimal burden as we have found through the reporting submitted that all states and agencies receiving other federal funds currently report on a federal fiscal year.
23	Sarah Hasbargen	Southeastern ND Community Action Agency	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."] I'm not sure.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
24	Sarah Hasbargen	Southeastern ND Community Action Agency	[In response to question "The clarity of the information to be collected."] I do feel like the data is missing a big highlight. What data is the gold standard to demonstrate our impact? Maybe if CAAs aligned reporting in the gold standard, that could really have some consistent, concrete data we can all use to show impact.	Alternative Response	OCS acknowledges this comment and emphasizes it is difficult to outline one gold standard based on the funding structure of CSBG and the issues it tackles. Because CSBG is a block grant that provides maximum flexbility to address an issue as expansive as poverty, there are many ways communities shape their service models to meet the needs and address poverty in their communities. What OCS emphasizes are the three national goals, data integrity and quality, what some key baselines are that exist across the nation and 99% of the counties in the US served by CSBG

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
25	Sarah Hasbargen	Southeastern ND Community Action Agency	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Data collection of high standards does produce significant burden, especially when layered on top of programmatic requirements. CSBG leveraging other funds is a strong outcome of the fund, but it also creates additional reporting burden. I don't know that I can offer a solution but one major barrier is that most of the other programs also require their own information and database	Alternative Response	OCS took a look at all the data points collected in the report and worked to remove redundancy. In instances where agencies are already reporting certain data to other federal agencies, OCS has worked to remove that duplication of burden on local agencies and should the need arise to extract data from our colleagues witihin ACF, HHS, or across government exist we can continue working with those stakeholders to review the data. Related to the alignment, a key way this is done is through shifting the entire country to report on the federal fiscal year.
26	Sarah Hasbargen	Southeastern ND Community Action Agency	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] I appreciate the concrete supports added that offer presumed outcomes.	Alternative Response	OCS acknowledges this comment and appreciates the feedback.
27	Larissa Corston-Thomas	Community Action of Nebraska, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] One federal system for CSBG recipients to collect, analyze, and disseminate data.	Alternative Response	OCS acknowledges this comment and emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds cooperative agreements with the National Association of State Community Service Program (NASCSP) to create custom forms with coding so each local agency has a tool to submit the data at no cost to them. Systems used at the local level for reporting are not under the purview of the
28	Larissa Corston-Thomas	Community Action of Nebraska, Inc.	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Yes, it poses a significant burden that is felt year-round throughout the community action agencies.	Alternative Response	OCS acknowledges this comment and is keenly aware of the burden data collection, analysis, and reporting may have on the CSBG Network. In making suggested edits to Annual Report 3.0, OCS sought to reduce reporting burden to the greatest extent possible. We examined each data point, its utilization, how often it's actually reported, where else it's reported, and how it rolls up nationally, then compared the benefit of collecting each data point to the potential burden of collecting the data at the individual, agency, and grant recipient level. Burden estimates can be
29	Larissa Corston-Thomas	Community Action of Nebraska, Inc.	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] The burden could be minimized by having one system for collection that is geared specifically toward CSBG requirements. I've spoken with some agencies who have to pull data from 15 different databases to complete their annual reports. This creates a huge burden for technological & personnel resources...Having one system would also allow OCS to pull real time data when	Alternative Response	OCS acknowledges this comment and emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds cooperative agreements with the National Association of State Community Service Program (NASCSP) to create custom forms with coding so each local agency has a tool to submit the data at no cost to them. Systems used at the local level for reporting are not under the purview of the
30	Larissa Corston-Thomas	Community Action of Nebraska, Inc.	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Having one system for collecting the data would also reduce the potential for errors as different systems may use different metrics.	Alternative Response	OCS acknowledges this comment and emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds cooperative agreements with the National Association of State Community Service Program (NASCSP) to create custom forms with coding so each local agency has a tool to submit the data at no cost to them. We will continue working on strategies to mitigate errors in the data process to

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
31	Mark Berndt	CAP of Riverside County	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] I agree that the effort to connect services to outcomes is consistent with ROMA principles and practices, and good form.	Alternative Response	OCS acknowledges this comment and appreciates the feedback.
32	Mark Berndt	CAP of Riverside County	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Not a significant additional burden.	Alternative Response	OCS acknowledges this comment and appreciates the feedback.
33	Mark Berndt	CAP of Riverside County	[In response to question "The clarity of the information to be collected."] I have not read the materials closely enough to answer to this.	Alternative Response	OCS acknowledges this comment and appreciates the feedback.
34	jackie slade	Sutter County Community Action Agency	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] In the Health and Nutrition outcome tab, most of the indicators seem to be only services, not actual outcomes (FNPI 5c, 5d, 5e, 5g,5h 5i)	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPI 5 with directional language (i.e., increase or decrease) to better capture change the impact of services.
35	Karen Quackenbush	Delta Human Resource Agency	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Clarification in instructions that NPIs are optional.	Request Change Accepted	OCS acknowledges and appreciates this feedback. During the first year post-OMB approval, the reporting structure will remain exactly the same and provide the federal office with time to update materials and work on a robust technical assistance plan to support states that have a wide array of data collection strategies. So during this time, we will begin working with our funded partners to update SmartForms, update database coding and validations for states that operate databases available at no cost, and release policy, guidance, and communications to support the
36	Karen Quackenbush	Delta Human Resource Agency	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Reconsideration of removal of NPI 7a--very useful to create a unified story of change when agencies do different work.	Request Change Not Accepted	OCS reviewed all of the technical assistance requests and the utilization of indicators writ large in reporting and there were significant issues with validity of the data reported for services supporting multiple domains in addition to the burden placed on local and state agencies to correctly capture this data point, OCS prioritized the burden reduction and removed this indicator from federal reporting requirements. OCS emphasizes that the removal of the federal requirement to report does not preclude states and local agencies from collecting the data and using for their own needs.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
37	Sue Kervin	Action for a Better Community, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] [[1]] 'Obtain employment' is a very important indicator in our opinion, and we recommend keeping that outcome.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
38	Sue Kervin	Action for a Better Community, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] [[2]] Some of the services and outcomes for Adult Education do not reflect standards in that field. For example, the FNPI for "SRV 2n The number of individuals attending basic education classes (e.g.: financial literacy)" does not match ("FNPI 2d The number of individuals who obtained a recognized credential, certificate, or degree relating to the achievement of educational or vocational skills."). A more appropriate outcome is "improved basic education skills". ABE is a very low level of education (about 3rd -	Request Change Accepted	OCS acknowledges this comment and appreciates feedback. An indicator was added to the NPIs to reflect achieving basic education skills for adults.
39	Sue Kervin	Action for a Better Community, Inc.	[In response to question "The quality of the information to be collected."] Almost everything in Domain 5 are not outcomes, they are outputs.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
40	Sue Kervin	Action for a Better Community, Inc.	[In response to question "The clarity of the information to be collected."] "SRV 2m The number of adults attending English Language classes." Are these English as a Second Language classes? If yes, it should be specified.	Request Change Accepted	OCS revised SRV 2m to specify this refers to English for Speakers of Other Languages.
41	Shawn Howell		[In response to question "The quality of the information to be collected."] Switching Modules 3 and 4 will cause confusion.	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
42	Shawn Howell		[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] The streamlining of data is great, however we must be careful that we are telling the right story in doing so. . . a story beyond being an emergency service provided.	Alternative Response	OCS is confident that the proposed data collection will capture the services CSBG provides and tell the program's story well. The report includes more than just emergency services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
43	Shawn Howell		[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Too many of the new “NPIs” are not outcomes. A core element of the ROMA curriculum is to teach the network the difference between outputs and outcomes. This report counters these principles.Note that “enrolling” or “connecting” are not outcomes in accordance with ROMA principles and practices.	Request Change Accepted	OCS revised the FNPIs to include directional language (i.e.: increase, decrease) structure for outcomes.
44	Shawn Howell		[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] I appreciate reducing the burden and the attempt to streamline data, but the new report does not adequately tell the story of Community Action, which has the historical purpose of eliminating barriers to self-sufficiency. The report does not provide an opportunity to document movement out of poverty in any way. It also does not allow for reporting of case management. Further, it does not allow for the reporting of additional elements beyond the NPIs, which may hinder	Alternative Response	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency
45	Shawn Howell		[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] I agree with a person speaking in the webinar that everything the organization does should have an outcome. I’m not a fan of the “concrete” philosophy. The outcome can simply be defined as the removal of a problem. If an agency can’t identify a problem that they are addressing, they aren’t implementing ROMA. Thus, they must be able to document that the problem is removed.	Alternative Response	OCS acknowledges this comment and highlights that in the current reporting schema, there are several concrete supports (See AR 2.0 SRV 2k, SRV 2aa, SRV 2bb, SRV 3g, SRV 3m, SRV 3n, SRV 3p, SRV 3q, SRV 4c, SRV 4d, SRV 4e, SRV 4j, SRV 4k, SRV 5ii, SRV 5jj, SRV 5nn). The proposed changes aim to highlight what is a concrete support to demonstrate that much of the work of Community Action is also evidence-based in helping to lead to strengthened outcomes and self-sufficiency. The current reporting struture with the indicators do not show a relationship between the
46	Amy Boccadoro	Community Action Committee of the Lehigh Valley, Inc.	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] This entire presentation was/in emensly difficult to follow. I have links coming in through the chat while I'm trying to listen to someone speak in, what at times feels like, a foreign language. Are there are going to be better trainings on this - by someone who is actually a teacher, not just a regurgitator.	Alternative Response	OCS acknowledges and appreciates this feedback. During the first year post-OMB approval, the reporting structure will remain exactly the same and provide the federal office with time to update materials and work on a robust technical assistance plan to support states that have a wide array of data collection strategies. So during this time, we will begin working with our funded partners to update SmartForms, update database coding and validations for states that operate databases available at no cost, and release policy, guidance, and communications to support the
47	Amy Boccadoro	Community Action Committee of the Lehigh Valley, Inc.	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] This is whole reporting effort is so confusing and without solid definitions and no one seems to have solid answers to things.	Alternative Response	OCS acknowledges and appreciates this feedback. During the first year post-OMB approval, the reporting structure will remain exactly the same and provide the federal office with time to update materials and work on a robust technical assistance plan to support states that have a wide array of data collection strategies. So during this time, we will begin working with our funded partners to update SmartForms, update database coding and validations for states that operate databases available at no cost, and release policy, guidance, and communications to support the
48	Amy Boccadoro	Community Action Committee of the Lehigh Valley, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Strong definitions and trainings (by true trainers/teachers!)	Alternative Response	OCS acknowledges and appreciates this feedback. During the first year post-OMB approval, the reporting structure will remain exactly the same and provide the federal office with time to update materials and work on a robust technical assistance plan to support states that have a wide array of data collection strategies. So during this time, we will begin working with our funded partners to update SmartForms, update database coding and validations for states that operate databases available at no cost, and release policy, guidance, and communications to support the

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
49	Amy Boccadoro	Community Action Committee of the Lehigh Valley, Inc.	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."] When it's not clear how to report, it's an emmense burden.	Alternative Response	OCS acknowledges and appreciates this feedback. During the first year post-OMB approval, the reporting structure will remain exactly the same and provide the federal office with time to update materials and work on a robust technical assistance plan to support states that have a wide array of data collection strategies. So during this time, we will begin working with our funded partners to update SmartForms, update database coding and validations for states that operate databases available at no cost, and release policy, guidance, and communications to support the
50	Clint Cottam	Community Action Partnership of Utah	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] It is necessary to make changes, however, it would have been preferred to have started with feedback sessions first to developed proposed changes. The changes that were necessary were not added in this current version. Therefor, I don't think these changes are as effective as they could be.	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsbilities under PRA.
51	Clint Cottam	Community Action Partnership of Utah	[In response to question "The quality of the information to be collected."] Reducing the number of data points does look like it will help with quality. However, do these changes do it in the right way?	Alternative Response	OCS acknowledges this comment and appreciates the feedback.
52	Clint Cottam	Community Action Partnership of Utah	[In response to question "The clarity of the information to be collected."] Several of the datapoints and domain alignments will result in loss of important work that the national work does. Losing the important impact does not increase clarity.	Alternative Response	Thank you for this comment. Given how large the CSBG network is and each agency's unique needs and services, there may be some indicators we have proposed removing that may be useful for your state or local agency to collect, and while OCS has made the decision to remove it from the federal reporting requirements this does not preclude grant recipients and sub-recipients from continuing to collect it, nor does it indicate that the data point is not of value. This exercise was about reducing the burden the federal government requires and us comporting with the Paperwork
53	Clint Cottam	Community Action Partnership of Utah	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."] Changing the report alone does not necessarily increase accuracy. More investment in the national network at all levels (including through TTA provided through national partners and State Associations) help with accuracy more than changing the report alone.	Alternative Response	OCS acknowledges this comments and appreciates the highlight of the need for TTA. On October 31, 2023 OCS issues CSBG-DCL-2024-01 which announced the new cohort of training and technical assistance providers under the requirements of the CSBG Act to fund TTA. The updates to the TTA with CSBG federal discretionary funding was informed by the National TTA survey issued to the network and the commitment made to enhance federal operations. OCS continues to work with its funded providers to enhance TTA for the state, tribal, territorial, and local agencies.
54	Clint Cottam	Community Action Partnership of Utah	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] I do support simplification of several SRVs and FNPIs. With training and crosswalks, this has the potential to be effective.However, the services to outcome plan is duplicative of Logic Models and CAP Plans that are already gathered at local agencies and monitored by State Offices.	Alternative Response	OCS appreciates this comment. As noted in the listening session, the service out outcome model was intentionally mirrored after logic models to show a direct line between services and longer term outcomes and to ensure the national performance reporting is evidence based.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
55	Clint Cottam	Community Action Partnership of Utah	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] • Add VITA/tax preparation services. I know this is one very common service within both the state and national network.	Request Change Accepted	OCS accepts this edit and has added VITA as a countable service for SRV 3a and will include this in the supplemental manual and training upon OMB approval.
56	Clint Cottam	Community Action Partnership of Utah	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] • Add SRVs or FNPIs that relate to digital inclusion. Some are exploring refurbished device distributions, skills classes, etc.	Request Change Not Accepted	OCS acknowledges this comment and particular note regarding digital inclusion. Because this topic is one that is not yet widely understood how CSBG funds may support this writ large, we encourage grant recipients and sub grant recipients to either use the 'Other' service and FNPI elements along with the Community Level Transformation in Module 4 to document and track the services and outcomes of this type of work.
57	Clint Cottam	Community Action Partnership of Utah	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] • Ensure customized outcome indicators in a number of domains (it might be possible that this might have happened accidently)	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an ‘other’ with requirement of description.
58	Clint Cottam	Community Action Partnership of Utah	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] • Possibly readd FNPI for meeting basic needs/concrete supports. Sometimes stabilizing families are the only outcomes I can find for "concrete services" - especially for things like the DDDRP.	Request Change Not Accepted	OCS acknowledges this comment but highlights the current FNPI that references basic needs is not one that can easily be stratified to determine what those basic needs may be. The example included is the Diaper Program which has a service indicator to capture that. Referencing these concrete supports that are evidence-based permits the federal office to explicitly say "X agency provided Y amount of diapers providing a basic need for Z number of families. Capturing basic needs without attributing what need was met removes the attribution to the service.
59	Clint Cottam	Community Action Partnership of Utah	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] • Readd FNPI 7a. I am sort of sad about this. This was a great unduplicated summary of how many people had any positive outcomes (changes) in the year. For advocacy and communications, FNPI 7a is a life saver!	Request Change Not Accepted	OCS reviewed all of the technical assistance requests and the utilization of indicators writ large in reporting and there were significant issues with validity of the data reported for services supporting multiple domains in addition to the burden placed on local and state agencies to correctly capture this data point, OCS prioritized the burden reduction and removed this indicator from federal reporting requirements. OCS emphasizes that the removal of the federal requirement to report does not preclude states and local agencies from collecting the data and using for their own needs.
60	Clint Cottam	Community Action Partnership of Utah	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Change language in the instructions. Right now the language says "FNPIs are optional." Maybe clarify by saying "eligible entities select and report on indicators that align with their Community Action Plans."	Request Change Accepted	OCS acknowledges and appreciates this feedback. During the first year post-OMB approval, the reporting structure will remain exactly the same and provide the federal office with time to update materials and work on a robust technical assistance plan to support states that have a wide array of data collection strategies. So during this time, we will begin working with our funded partners to update SmartForms, update database coding and validations for states that operate databases available at no cost, and release policy, guidance, and communications to support the

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
61	Lily Rivera-Graves	Community Services & Employment Training, Inc.	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] Information proposed for collection is fine. Removing some of the redundancy is helpful.	Alternative Response	OCS acknowledges this comment and appreciates the feedback.
62	Lily Rivera-Graves	Community Services & Employment Training, Inc.	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] additional guidance on definitions for both FNPIs and SRVs is appreciated.	Alternative Response	OCS acknowledges and appreciates this feedback. During the first year post-OMB approval, the reporting structure will remain exactly the same and provide the federal office with time to update materials and work on a robust technical assistance plan to support states that have a wide array of data collection strategies. So during this time, we will begin working with our funded partners to update SmartForms, update database coding and validations for states that operate databases available at no cost, and release policy, guidance, and communications to support the
63	Lily Rivera-Graves	Community Services & Employment Training, Inc.	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Our only concern is why are we switching to FFY; we've been doing the Annual Report calendar year and that proves to be a well rounded method to collecting data across so many different programs and funding streams. Switching to FFY means to collect 10/1/24-9/30/25 and that shift can prove to be more burdensome.	Alternative Response	OCS acknowledges this comment and emphasizes that the shift to federal fiscal year should not change the way contracts are handled at the local level but rather the reporting of services. To effectively aggregate national data across 53 states and territories, OCS is priotizing using one standardized reporting period. OCS anticipates this will be of minimal burden as we have found through the reporting submitted that all states and agencies receiving other federal funds currently report on a federal fiscal year.
64	Lily Rivera-Graves	Community Services & Employment Training, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Gender - to be in line with DEI, we should consider additional fields here to be more inclusive.Race - consider adding Hispanic here.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
65	Lily Rivera-Graves	Community Services & Employment Training, Inc.	[In response to question "The quality of the information to be collected."] Better clarity of the merging of NPIs or SRVs, because that is going to affect how we reconfigure our database systems.	Alternative Response	OCS acknowledges and appreciates this feedback. During the first year post-OMB approval, the reporting structure will remain exactly the same and provide the federal office with time to update materials and work on a robust technical assistance plan to support states that have a wide array of data collection strategies. So during this time, we will begin working with our funded partners to update SmartForms, update database coding and validations for states that operate databases available at no cost, and release policy, guidance, and communications to support the
66	Lily Rivera-Graves	Community Services & Employment Training, Inc.	[In response to question "The clarity of the information to be collected."] 7A is a good one to keep for FNPIs, because we can see how many undup people got multiple services across programs.	Request Change Not Accepted	OCS reviewed all of the technical assistance requests and the utilization of indicators writ large in reporting and there were significant issues with validity of the data reported for services supporting multiple domains in addition to the burden placed on local and state agencies to correctly capture this data point, OCS prioritized the burden reduction and removed this indicator from federal reporting requirements. OCS emphasizes that the removal of the federal requirement to report does not preclude states and local agencies from collecting the data and using for their own needs.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
67	Lily Rivera-Graves	Community Services & Employment Training, Inc.	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."]We only have 2 analysts in our agency, so there is large burden in doing the report.So if the report is FFY 10/2024 - 9/2025, does this mean the report due date will still be in March ro in November.because we are used to calculating in calendar year, the one month timeframe to complete the report by Feb 1st has been a challenge in the past, but now with a FFY reporing timeframe, that will become even more difficult, since many programs have carryovers in services, and they will need to enter their data quickly.	Alternative Response	OCS acknowledges this comment and emphasizes that the shift to federal fiscal year should not change the way contracts are handled at the local level but rather the reporting of services. To effectively aggregate national data across 53 states and territories, OCS is priotizing using one standardized reporting period. OCS anticipates this will be of minimal burden as we have found through the reporting submitted that all states and agencies receiving other federal funds currently report on a federal fiscal year.
68	Chris Snyder	NORWESCAP	We appreciate having clear cut alignment of services to FNPIs. Very convenient as new addition.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
69	Chris Snyder	NORWESCAP	As far as documents we will be receiving, it would be helpful if the documents provide additional guidance regarding the limits to the timeframe of reporting. Some work may require longer than one year to see progress based on the 2.1 measurements (for ex. increasing stability in housing). Also, in NJ we'll be switching from state year to fiscal year, so it would be helpful to receive additional guidance on navigating that change. I'm assuming there will be guidance on resubmitting CAP plans on this new guidance.	Alternative Response	OCS acknowledges and appreciates this feedback. During the first year post-OMB approval, the reporting structure will remain exactly the same and provide the federal office with time to update materials and work on a robust technical assistance plan to support states that have a wide array of data collection strategies. So during this time, we will begin working with our funded partners to update SmartForms, update database coding and validations for states that operate databases available at no cost, and release policy, guidance, and communications to support the
70	Jaimi Clifford	Maine Department of Health and Human Services	We are combing through changes quite thoroughly because we are currently doing our annual overhaul for next year's data collection. Areas of grey in merged areas. Unclear what was merged together. Agencies with data systems that have to remap, would be nice to know what was merged together and where they went. Charisse said states will still be able to collect removed indicators to maintain that data for our state. But if we know what was merged and where, we can better guide agencies on best business practice. But for the most part I think agencies will be happy.	Alternative Response	OCS acknowledges and appreciates this feedback. During the first year post-OMB approval, the reporting structure will remain exactly the same and provide the federal office with time to update materials and work on a robust technical assistance plan to support states that have a wide array of data collection strategies. So during this time, we will begin working with our funded partners to update SmartForms, update database coding and validations for states that operate databases available at no cost, and release policy, guidance, and communications to support the
71	Clint Cottam	Community Action Partnership of Utah	Appreciation for trying to streamline. Utah state association.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
72	Clint Cottam	Community Action Partnership of Utah	Disappointed FPNI 7A gone.	Alternative Response	OCS reviewed all of the technical assistance requests and the utilization of indicators writ large in reporting and there were significant issues with validity of the data reported for services supporting multiple domains in addition to the burden placed on local and state agencies to correctly capture this data point, OCS prioritized the burden reduction and removed this indicator from federal reporting requirements. OCS emphasizes that the removal of the federal requirement to report does not preclude states and local agencies from collecting the data and using for their own needs.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
73	Clint Cottam	Community Action Partnership of Utah	Comment on concrete supports. Love the term. A little disappointed that there aren't outcomes attached because I know we collect outcomes. As someone who used to work at local before state, I want outcomes for concrete supports. I believe we have more outcomes. To cut off that door for concrete supports, that is a concern. Some indicators that seem to be about receiving and access. Some language behind indicators to revisit.	Alternative Response	OCS acknowledges this comment. Concrete supports have traditionally been in the report but have not had a clear dileneation into how they may be counted. Research in human and social services highlights the outcome of providing concrete supports lead to a better quality of life because basic needs are met. At the national level, the goal would be shape the reporting narrative by showing all these concrete supports as a performance measure along with the other indicator to tell the broader story. For example, SRV 1c which provides supplies for employment like work boots
74	Clint Cottam	Community Action Partnership of Utah	Equity and inclusion - appreciate that being added to module 3, but didn't see those additions to family level module.	Alternative Response	OCS made no changes to the current Module 3 (Community Level Transformation). The structure of the entire report emphasizes equity as it addresses key elements of the CSBG Act related to families and communities with low-income.
75	Adrian Angel	Office of Community Assistance	Characteristics report - whenever I talk to my colleagues changing race and ethnicity (adding some categories) but changes here are not adding any categories. Is that going to be looked at to align with what other programs may be asking for?	Request Change Accepted	OCS has updated the race and ethnicity categories to align with the White Office of Management and Budget directive (SPD-15) on race and ethnic categories for federal reporting.
76	Adrian Angel	Delta Human Resource Agency	Noticed state plan data was sent out with no real proposed changes. With how state plan and annual report work together, thought I would see changes to state plan as well.	Alternative Response	OCS released the request to OMB for the State Plan after the annual report due to the expiration of the Annual Report preceding the plan. In the Dear Colleague Leter (DCL) referencing the 60-day notice for public comment on the state plan, OCS indicated the anticipation of submitting subsequent revisions to the plan once OMB approved the Annual Report package. OCS did not want to propose any changes to the state plan until we received comment on the report and subsequent OMB approval as it is also our largest collection of information. We anticipate submitting a revision in
77	Lily Rivera-Graves	Community Services & Employment Training, Inc.	January to December originally, changing to federal fiscal year (October to September) that might add burden on our end capturing data at our agencies and having to redo reports/tools, upgrading multiple software. I'm curious if federal fiscal year change if due date is still March. For our state, our report has to be done by Feb 1st. Will it still be due February 1st? Lily is in Central Valley California (Tulare county?)	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical
78	Matt Timbers	Project GO, Inc.	Contracts typically don't get executed until November. So will the state change their contract times to match?	Alternative Response	OCS acknowledges this comment and emphasizes that the shift to federal fiscal year should not change the way contracts are handled at the local level but rather the reporting of services. To effectively aggregate national data across 53 states and territories, OCS is priotizing using one standardized reporting period. OCS anticipates this will be of minimal burden as we have found through the reporting submitted that all states and agencies receiving other federal funds currently report on a federal fiscal year.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
79	Stephanie Bingham	People's Equal Action and Community Effort, Inc.	We noticed 7L (immigration services) was crossed off. We saw an increase in services related to immigration and migrant services. We would like to continue to show the need in our area for these services to our state.	Request Change Not Accepted	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency
80	Stephanie Bingham	People's Equal Action and Community Effort, Inc.	In addition to immigration, there has been a push for fatherhood work. Parenting classes did get nixed, but I'm sure it got merged. However, we would like it to stay a bit more specific so we could show our work in this area.	Request Change Not Accepted	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency
81	Clint Cottam	Community Action Partnership of Utah	Version I saw didn't see in employment domain is additional outcome indicators. Like idea that Charisse said continuing giving optional indicators.	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an 'other' with requirement of description.
82	Clint Cottam	Community Action Partnership of Utah	2 more thoughts on services that might be going along... VITA is a big thing. Even if moving to concrete supports, free tax prep should be considered an important concrete service.	Request Change Accepted	OCS accepts this edit and has added VITA as a countable service for SRV 3a and will include this in the supplemental manual and training upon OMB approval.
83	Clint Cottam	Community Action Partnership of Utah	Child care - historically had a lot of places to report subsidies and payments, but not a place to report if the CSBG agency offers child care itself. Extra consideration on things commonly found in our network.	Alternative Response	OCS recognizes this as a service option and in the proposed collection SRV 2d captures child care services that are Early Head Start and Head Start.
84	Lily Rivera-Graves	Community Services & Employment Training, Inc.	ditto Clint. We also operate VITA.	Request Change Accepted	OCS accepts this edit and has added VITA as a countable service for SRV 3a and will include this in the supplemental manual and training upon OMB approval.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
85	Lily Rivera-Graves	Community Services & Employment Training, Inc.	Combining SRVs. Clear definition on what can be included in SRVs. Some guidance reports on NASCAS website are awesome for NPIs (very clear definitions and examples which helps consistency) but for SRVs feel like there is need for clearer definitions for consistency across agencies, across a state, across multiple states so we are capturing uniform information.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
86	Lily Rivera-Graves	Community Services & Employment Training, Inc.	SRV 3O being merged - that's a really big program in our agency. Clarity on whether can I still report it and where.	Request Change Accepted	OCS accepts this edit and has added VITA as a countable service for SRV 3a and will include this in the supplemental manual and training upon OMB approval.
87	Stephanie Bingham	People's Equal Action and Community Effort, Inc.	also say ditto. VITA is new program and very very important and finally have all year funding. SYR, NY Peace Inc	Request Change Accepted	OCS accepts this edit and has added VITA as a countable service for SRV 3a and will include this in the supplemental manual and training upon OMB approval.
88	David Knight	California Community Action Partnership Association	Removing 90 or 180 days on employment - set us back on telling our story on a lot of the work we do about create jobs and keep jobs and stay in those jobs. That being removed, signifies new annual report on short term service.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
89	Larissa Corston-Thomas	Community Action of Nebraska, Inc.	I noticed that many different types of databases and tech are used to collect info for the annual report. If we could consolidate into one system that would be extremely helpful. It would eliminate defining NPI and SRVs and allow OCS to pull info real time/get info quicker and reduce burden on agencies (personnel, technology cost). We had a data convening back in September and that was something they identified. One agency had 15 databases they were pulling information from and I was thinking that would be a nightmare to pull from so many places for annual report time. We use Clarity (HMIS database) where we	Alternative Response	OCS acknowledges this comment and emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds cooperative agreements with the National Association of State Community Service Program (NASCSP) to create custom forms with coding so each local agency has a tool to submit the data at no cost to them. Systems used at the local level for reporting are not under the purview of the
90	Karen Quackenbush	Delta Human Resource Agency	I already entered a comment in the poll, but I have a question--does OCS have a red line edited version so we can see changes to the report?	Alternative Response	Due to the structure of the report a redline copy would be difficult to interpret with the tables and create inaccessibility issues when posting online for those with visual impairments. Included with the DCL announcing the 60-day comment period, OCS included an **Indicator Disposition Report** which shows each indicator that was removed, merged, repurposed, or added.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
91	David Knight	California Community Action Partnership Association	FNPI 2a was changed to say number of young children in early childhood services to better measure outcomes, but you're measuring outputs at this point. FNPI 2a and 2b used to measure outcomes like education received.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
92	David Knight	California Community Action Partnership Association	Moving whole modules from 4 to 3 is a pretty big burden for systems already built (data and training systems). We've always measured services first and outcomes second, so concerned about switching that after 20 years	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
93	Nancy Boudreau	Berks Community Action Program, Inc.	I heard the part about switching to federal fiscal year from state fiscal year. Has that already occurred?	Alternative Response	OCS is planning a phased-in implementation approach for the new reporting requirements to allow the states and local agencies time to adjust systems, update processes and procedures, and train staff. As noted in the DCL, the implementation plans for two federal fiscal years with added support and technical assistance.
94	David Knight	California Community Action Partnership Association	I advise against switching to federal fiscal year. The majority of states have delayed funding, so it doesn't match federal fiscal year. If that's the case, A) it's going to be a lot of change, and B) it won't match. The majority of states don't get their full CSBG budget until 6 months into the year.	Request Change Not Accepted	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
95	Lily Rivera-Graves	Community Services & Employment Training, Inc.	Agency staff capacity (like trainings) was removed (was in Module 2). I'll continue to track internally, part of organizational standards 7.9. I always tie those categories together.	Alternative Response	OCS appreciates this comment and continues to encourage local agencies to track the data they require for their local needs and state requirements.
96	Clint Cottam	Community Action Partnership of Utah	Echo support for what Lily said about training. As a training TA provider, it is very helpful to measure whether we are building towards capacity. Excited for dashboard, to see whether outcomes improved.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
97	Becky Boren	Crosswalk Community Action Agency	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] It does take time. A better or standardized data collection system would be beneficial. If there were a system that could import data from other data systems would be great.	Alternative Response	OCS acknowledges this comment and recognize the desire to have one unified system across all federla agencies that fund local acitivities. While the cost prohbition would prevent it from happening, OCS continues to work with its federal partners to streamline data points where possible.
98	Valerie Stock	Chautauqua Opportunities, Inc.	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] I think we will not be counting a lot of what the agencies are doing within their communities with the proposed changes to the FNPI. Also, In and attempt to capture what is needed in our specific communities would be loss.	Alternative Response	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency
99	Valerie Stock	Chautauqua Opportunities, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Leave the FNPI numbers as they are this way we know that what we are actually doing in our communities are being counted.	Alternative Response	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency
100	Nina Riggall	Delta Human Resource Agency	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] i think it is necessary in order to ensure the data collection is reliable and accurate in order to support more relevant and needed outcomes.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
101	Nina Riggall	Delta Human Resource Agency	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] In my opinion I do not see a significant burden. the process of efficient data collection is always worth the effort	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
102	Nina Riggall	Delta Human Resource Agency	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] none at this time	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
103	Cali Sweeting	Oswego County Opportunities, Inc.	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] I feel as if the transportation area is broken down perhaps a little too much and causes unnecessary burdens. The end goals of those activities are the same, and many are along the same line of thought.	Alternative Response	OCS acknowledges this comment and included transportation as it is a commonly reported metric across grant recipients in the other category and research has shown that it is a key factor for economic mobility. OCS emphasizes the unit of measurement for transportation is not the individual but the transportation unit which should be easier to capture from inventory of units such as vouchers procured or number of riders.
104	Cali Sweeting	Oswego County Opportunities, Inc.	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] The transportation area does as we do so much of it and breaking it down so significantly it is going to be difficult to track.	Alternative Response	OCS acknowledges this comment and included transportation as it is a commonly reported metric across grant recipients in the other category and research has shown that it is a key factor for economic mobility. OCS emphasizes the unit of measurement for transportation is not the individual but the transportation unit which should be easier to capture from inventory of units such as vouchers procured or number of riders.
105	Cali Sweeting	Oswego County Opportunities, Inc.	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Additionally, I have concerns over our reporting systems managing these changes. I've been through this with an EMR in a medical practice and over a year passed before it was figured out, meaning we all had to do everything manually.	Alternative Response	OCS acknowledges this comment and appreciates the feedback, the state systems are outside of our purview but OCS has invested in the CSBG Performance Management Website which provides a dynamic display of data submitted to the federal office.
106	Cali Sweeting	Oswego County Opportunities, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] I appreciate the consolidation of many data points that were similar services that lead to the same overall outcomes. I think more of this should be explored.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
107	Cali Sweeting	Oswego County Opportunities, Inc.	[In response to question "The quality of the information to be collected."] I'm not sure what this is asking.	No Change or Response Needed	No response required.
108	Cali Sweeting	Oswego County Opportunities, Inc.	[In response to question "The clarity of the information to be collected."] So many funders have different definitions of things - like are transports one way or round trip, for example. It makes it complicated for programs to have universal understandings of what the services mean for funders vs. CSBG. This will impact staff understanding / clarity.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
109	Cali Sweeting	Oswego County Opportunities, Inc.	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."] I'm not sure what this is asking.	No Change or Response Needed	No response required.
110	Cathy Poole	Jefferson-Franklin Community Action Corporation (JFCAC)	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] What I have read so far in the attachments, I agree with the changes. It needed revised and I am very glad that Transportation section was added.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
111	Cathy Poole	Jefferson-Franklin Community Action Corporation (JFCAC)	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Not sure just yet. We do use a state-wide system in Missouri so we will be working very close with our state office to prepare for the changes.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
112	Cathy Poole	Jefferson-Franklin Community Action Corporation (JFCAC)	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] I honestly do not know yet since I have not gone through every Module yet.	No Change or Response Needed	No response required.
113	Barbara Schachern	Wisconsin Department of Children and Families	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] yes; it does.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
114	Barbara Schachern	Wisconsin Department of Children and Families	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] No	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
115	David Hagen	Hawkeye Area Community Action Program, Inc.	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] The Devil is in the Details, but this presentation only provided summary information on the approach and the need for changed based on the transitions from DUNS to UEI. Thus, cannot comment on the details of the changes in ver 3.0 Module 3 (formerly Mod 4 in the current version).	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
116	David Hagen	Hawkeye Area Community Action Program, Inc.	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] It is unfortunate that OCS did not build consensus about these changes, starting in 2022 when the notice of change to the UEI, with the CAA network of agencies, ANCRT, NASCSP, NCAP, and CAPLAW. Very short sighted.	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an
117	David Hagen	Hawkeye Area Community Action Program, Inc.	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] The burden for a local CAA in Iowa is that we have integrated NPI reporting in an 18-month cycle that reflects the ROMA Cycle. What that means is the current FNPIs and CNPIS (embedded within the CISF) are being used in the planning phase for FY2025. In short, your implementation cycle is already late, which will be a burden.	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical
118	David Hagen	Hawkeye Area Community Action Program, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] 1) make sure that each domain category of the FNPIs still has the option for CAAs to create Other NPIs that reflect anti-poverty work that addresses local needs.	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an 'other' with requirement of description.
119	David Hagen	Hawkeye Area Community Action Program, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] 2) Update the national Theory of Change illustration to include the Transportation Domain.	Alternative Response	OCS thanks you for this comment and plans to update the federal training and technical assistance materials to reflect the report once approved. The Theory of Change is a component of understanding community action driven by stakeholders and not the federal office as it does not comport with the statutory goals of CSBG and HHS along with the Government Accountability Office (GAO) has noted the federal office must ensure it aligns its performance measures and subsequent materials to the three goals of CSBG as opined in the law.
120	David Hagen	Hawkeye Area Community Action Program, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] 3) Something within the "new" module 4 that supports community-level Goal 2 and Goal 3 that addresses improved DEI in neighborhoods/communities.	Alternative Response	OCS appreciates this feedback and recognizes that projects and investments that focus on diveristy, equity, and inclusion exist across the nation. CSBG particularly addresses equity at its core as an anti-poverty strategy that creates flexibility for communities to adapt their service delivery to the unique needs of their respective communities. The domains and key areas are designed to align with key common domains across the nation. If an initiative focuses on equity in housing then agencies should select housing as the domain and add additional quantifiers and metrics in

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
121	David Hagen	Hawkeye Area Community Action Program, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] 4) When cleaning up the unduplicated demographics of the current Module 4/future Module 3 (a) clarify the relationships employment characteristics with other incomes & non-income benefits; and (b) provide instruction to data system vendors to ensure that Totals of any specific characteristics (race, for example) match the overall totals for individuals and households served.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
122	David Hagen	Hawkeye Area Community Action Program, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] 5) OCS could simply not make any changes to the existing CSBG Annual Report (though I like the addition of the Transportation domain & making Mod 4, the new Mod 3) language of the NPIs, and still make the change to the UEI number.	Request Change Not Accepted	OCS acknowledges this comment and appreciates the feedback. The report revisions were to ensure we addressed the expansive nature of performance measures across CSBG while meeting the requirements of the CSBG Act, the findings of the CSBG Government Accountability Office (GAO) report, and minimize the burden on the public under the Paperwork Reduction Act. The connection between service to outcome also enhances how we tell the national story of CSBG.
123	David Hagen	Hawkeye Area Community Action Program, Inc.	[In response to question "The quality of the information to be collected."] Data quality really has not been addressed in this summary presentation. The CSBG Annual report needs to tell the story of the network's success. Data quality is about ensuring that all 1000s CAAs are reporting similiar services the same way.	Alternative Response	OCS acknowledges this comments and emphasizes that in our review of the annual report
124	David Hagen	Hawkeye Area Community Action Program, Inc.	[In response to question "The quality of the information to be collected."] Different than other funding sources (LiHEAP, for example), CSBG address change as measured in the FNPIs and CNPIs. Service counts are simply counts of what happened -- think runs scored in a baseball game -- while true outcome measures so progress toward a Goal -- we have three national goals that every NPI should support in some way. In the perspectives, runs scored are not equivalent to Wins. The new language of many of the FNPIs appears to be counting runs/outputs with wins/outcomes. This will reduce quality and clarity significantly.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
125	David Hagen	Hawkeye Area Community Action Program, Inc.	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."] I think the estimates are incorrect. If CAAs are already reporting service counts (SRV lists) for other non-CSBG grant funding streams, the burden will be less. I think the bigger issue relates to the data system infrastructure of States and CAAs with respect to the capacity to generate unduplicated service counts and aggregated demographics across funding streams. CSBG as a flexible resource to address local communities is great for all CAAs as it can be used to address local gaps of service. This allows each CAA	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple feeral agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources to address system changes for a routine process such as updated informtion collection under the Paperwork
126	Kelly Robertson	Greater Opportunities for Broome and Chenango, Inc.	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] IT appears to be appropriate	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
127	Kelly Robertson	Greater Opportunities for Broome and Chenango, Inc.	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] If the quarterly reports matached the annual report this would save time. You would already have to complied for the annual report	Alternative Response	OCS does not require or collect quarterly reports for CSBG from any of its grant recipients or sub grant recipients. This may be a process employed at the state or territory level. We encourage sub grant recipients to work with their funding state agency to update their processes in accordance with the changes once the report has been approved.
128	Kelly Robertson	Greater Opportunities for Broome and Chenango, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] No suggestions at this time	No Change or Response Needed	No response required.
129	Kelly Robertson	Greater Opportunities for Broome and Chenango, Inc.	[In response to question "The quality of the information to be collected."] Same as beforw	No Change or Response Needed	No response required.
130	Kelly Robertson	Greater Opportunities for Broome and Chenango, Inc.	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."] this cannot be estimated. Too many difference among agencies	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
131	Sabrina Krall	Mountainheart Community Services, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Income and Asset Building their is really no way to report our VITA program which we prepare over 1,000 tax returns each year. The way it is now would only report our financial literacy class but then the outcome doesn't seem to match on SRV 3a.	Request Change Accepted	OCS accepts this edit and has added VITA as a countable service for SRV 3a and will include this in the supplemental manual and training upon OMB approval.
132	Emily Young	Central Missouri Community Action (CMCA)	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] These new changes will cause a overall of the state required data system that is used. This would need time to be changed and implemented. Will cause a burden to the state and individual CAAs both time and money. Could additional funds be allocated to states to aid with these costs?	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
133	Emily Young	Central Missouri Community Action (CMCA)	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Multiple services can lead to different outcomes. I don't really see how this translates in the proposed changes.	Alternative Response	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job
134	Brandon Pollard	IMPACT Community Action Partnership, Inc.	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] I think these changes are overall positive in collecting the most important information while cutting out extraneous information that is not as important or creates a higher burden on agencies and the people we serve. One particular change I was happy to see was the addition of a family NPI that provides the opportunity for us to report on food being provided to families. Our agency has long been somewhat critical of the NPIs as not affctively doing what they're	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
135	Brandon Pollard	IMPACT Community Action Partnership, Inc.	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] I think the main burden will be in initial updates to our systems to ensure they are aligned with the reporting changes. This is ultimately a one-time burden though and I believe that on an ongoing basis the burden will be reduced. This initial change will likely require financial expenitures by agencies to update our data systems, which may be a significant challenge for smaller agencies in	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical
136	Brandon Pollard	IMPACT Community Action Partnership, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] We provide utility services for energy (LIHEAP) and water (a variety of programs, but in the reports it appears all utilities are lumped together. I would be in favor of seperating utilities out. We are seeing water as a huge unmet need in many of our communities and I think it would be useful for this and energy to be captured seperate from other utlility services.	Request Change Not Accepted	OCS acknowledges this comment and recognizes that certain utility payments demonstrate a higher need across the nation. There are some agencies that see higher rates of water assistance and others for energy while others may be other utilities like internet access. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office
137	Rebecca Fields-Santin	Tennessee Department of Human Services	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] I believe it is defiitely necessary. I love that transportation has been added to the domains. It will be useful.While I love the changes. I do agree that there needs to be a section added for self suffiency programs, case management, 2 Gen that would align with my states push for lessening silos and holistic approaches to services being provided. Maybe as simple of a count of how many participated in Case Management, etc, since we know it could include many items	Request Change Accepted	OCS acknowledges this comment and appreciates this feedback. The proposed revisions were reviewed and revised the report to create a service delivery and access element of the Annual Report directly before the domains where local agencies can add the number of individuals receiving case management, eligibility determinations, and referrals. These services are now labeled SDA for service delivery and access in recognition of the different models of these services that exist at the local level.
138	Rebecca Fields-Santin	Tennessee Department of Human Services	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] I don't feel there is any additional burden.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
139	Rebecca Fields-Santin	Tennessee Department of Human Services	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Continue other section to continue to promote autonomy, thinking outside the box	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
140	Lynnette Bates	Monroe County Opportunity Program, Inc	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] I agree with combining and simplifying services/indicators because some of the existing ones were difficult to distinguish in terms of meaning across the network. I'm sure we were reporting the same things on different lines.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
141	Lynnette Bates	Monroe County Opportunity Program, Inc	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] I think that the CSBG Annual Report has always been a pretty big burden, but the simplification and removal of dozens of reporting items can help it become less burdensome. I know others are concerned about the change and reduction of reporting items meaning they are not "getting credit" for all the minutia of what they do, but I think it's better to take out all of the unnecessary	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
142	Lynnette Bates	Monroe County Opportunity Program, Inc	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] I like the shift to separating services vs. concrete supports. I think most of what we do is actually providing supports, not necessarily "services," but I do anticipate it will take some time for the entire CSBG network to acclimate to this change in language use. I also think it's important to ensure all outcome indicator language conforms to ROMA principals. I noticed a few of them are very vague, and are simply indications of services received, not of an actual change happening in the life of the individual.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
143	Lynnette Bates	Monroe County Opportunity Program, Inc	[In response to question "The clarity of the information to be collected."] You will need to do a LOT of clarification and training regarding the difference between "Concrete Supports" and "Services" moving forward. The worst part of the CSBG Annual Report in the past is the need to independently interpret what different outcome indicator statements actually MEAN and how they are meant to be used. I also think it will take a lot of T&TA to help the network understand the different proposed units of measurement so that we are all counting things appropriately. It's difficult to attune databases to all of these different metrics. It's much simpler	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
144	Tiffany Romin	SEK-CAP	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] I appreciate a reduction in reporting, as long as there is understanding of how the old relates to the new.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
145	Tiffany Romin	SEK-CAP	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] The biggest concern for the new report is understanding how OCS defines each section, services, and NPI so that there is no confusion when we go to enter data into the new report. Training around this is very vital for the entire network.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
146	Tiffany Romin	SEK-CAP	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] We receive funding from our states Department of Transportation which restricts us from collecting information specific to each rider. We would like to report on the work we do in Transportation as it relates to rides provided. In doing that with the report you've proposed, we would have to collect demographics for those riders, which again, we are not allowed to do. Could you possibly consider adding lanugage around rides provided instead of just being specific to individuals? Or should this be considered	Request Change Accepted	OCS acknowledges this comment and notes all service counts are no longer based solely on the number of individuals served but are flexible for different units of measurement. The column for Transportation (SRV 7) now reads Unduplicated Number Served so the unit of measuremenr would be the voucher, pass, card, ride, or form of assistance. OCS will release supplemental materials and guides to provide more training and explanatory language on this service domain.
147	Tiffany Romin	SEK-CAP	[In response to question "The quality of the information to be collected."] Appreciate the reducation of demographics to be collected.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
148	Tiffany Romin	SEK-CAP	[In response to question "The clarity of the information to be collected."] The current Module 3 is something that most states have shied away from as we were told that upon submission only 5 agencies nationwide had filled the report in correctly. No further guidance on what/how that report needed to be was provided and thus we have discontinued using Module 3. It would be wonderful if we could have some guidance around how that needs to be navigated. (Kansas, SEK-CAP, Inc.)	Alternative Response	OCS acknowledges this comments and appreciates the feedback. Module 3 (Community Level Transformation) was set out to be recommended at in the first couple years of implementation in recognition of the fact that additional training and technical assistance would be required based on the submissions received. Following OMB approval, OCS will release updated manuals and guidance related to the entire Annual Report. We are also shifting to include feedback starting with the FY2023 CSBG Annual Report on the submissions received.
149	Tiffany Romin	SEK-CAP	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."] We have a good reporting database that allows us to run reports as long as the end user is inputing that data. However, we find that trying to collect services along with NPI's often becomes burdensome/busy work. It adds to the end users burdern of reporting, Please remember when you're asking for these services and NPI's that we deal with several different programs that often ask for data that is required under their grant agreements/performance standards. Adding CSBG into that mix is often like	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
150	Denise Steinbach	Community Action Partnership of North Dakota	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] The proposed collection appears to meet the measurement requested.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
151	Denise Steinbach	Community Action Partnership of North Dakota	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] We currently use a data management system. Are private database contractors aware of these proposed changes?	Alternative Response	OCS acknowledges this comment and shares that during the two year phased implementation, we will increase our training and technical assistance on these reporting structures and as we currently provide the coding for databases at no-cost, we will continue to so systems can be updated to reflect the collection of information. OCS also emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds
152	Denise Steinbach	Community Action Partnership of North Dakota	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] None - I appreciate the simplicity and clarity of the data requested	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
153	Denise Steinbach	Community Action Partnership of North Dakota	[In response to question "The quality of the information to be collected."] Again - it is way better to know what OCS/CSBG needs, rather than try to guess.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
154	Denise Steinbach	Community Action Partnership of North Dakota	[In response to question "The clarity of the information to be collected."] See above response. As a small state with limited capacity, the revisions will make training regarding standardized data collection much easier	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
155	Denise Steinbach	Community Action Partnership of North Dakota	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."] This is an unknown for a small state as we do not have dedicated staff to focus just on collection of data.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
156	Amy Bullard	Ohio Department of Development	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] Based upon this overview, I am in agreement that these changes will positively enhance the data collected to properly measure and report on performance. Adding Transportation as a Domain is excellent, we have many CAAs in Ohio that provide transportation.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
157	Amy Bullard	Ohio Department of Development	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] There will be some changes needed to our electronic client intake system that Ohio requires agencies to use for CSBG funded programs. Since our office is part of a large department, we have to propose changes and be added to a work prioritization list for changes to be made. This can take many months. In an ideal world, HHS would provide a client entry system to be used by eligible entities	Alternative Response	OCS appreciates this feedback and while at this current stage,we do not have the capacity for a single entry system. OCS will continue to explore ways in which the data entry and validation process can be updated to leverage technologies to be more efficient.
158	Amy Bullard	Ohio Department of Development	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] I need to analyze this more before answering. We are looking at the information as a team and will provide a formal response.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
159	Amy Bullard	Ohio Department of Development	[In response to question "The quality of the information to be collected."] I am pleased that the direction appears to be logical and valuable.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
160	Amy Bullard	Ohio Department of Development	[In response to question "The clarity of the information to be collected."] I will answer after further evaluation.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
161	Amy Bullard	Ohio Department of Development	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."] The consideration is greatly appreciated.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
162	M. Nancy Pfohl	New York State Department of State	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] The amount of data collected is overwhelming and really does not reflect outcomes accurately.	Alternative Response	OCS acknowledges this comment and highlights the central focus of this update was to ensure we are addressing the issue of burden faced by grant recipients and sub grant recipients.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
163	M. Nancy Pfohl	New York State Department of State	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] With the recent turnover in many CAAs/CAPs - the amount of data collected is a burden to understand and should be minimized.	Alternative Response	OCS acknowledges this comment and highlights the central focus of this update was to ensure we are addressing the issue of burden faced by grant recipients and sub grant recipients.
164	M. Nancy Pfohl	New York State Department of State	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] I haven't looked at the changes enough to make a recommendation at this time.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
165	M. Nancy Pfohl	New York State Department of State	[In response to question "The quality of the information to be collected."] Ideally, the data collected will give those telling the CSBG story that there a specific outcomes that are easy to tell - Ex. This many achieve employment, this many increased self sufficiency, etc.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
166	M. Nancy Pfohl	New York State Department of State	[In response to question "The clarity of the information to be collected."] This is very important to tell the CSBG success story - reducing the data point should help to achieve this.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
167	Mary Mullins	Missouri Ozarks Community Action, Inc. (MOCA)	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] I do beleieve that this will be streamlined and less of a Burden. I do have a concern of Services first. I am willing to try but being in the IT(Systems world for 35 years it goes against everything I have learned. How do you know what your services will be if you do not know what outcome you are trying to acheive. I welcome change I hope it is a good one.	Alternative Response	OCS acknowledges this comment and notes the switching of order should not impact the systems as the order is about 1.) demonstrating a logical connection between services leading to outcomes and 2.) about equity across the reporting structure to include tribes. OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information
168	Georgia Del Freo	Community Action Association of PA	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] The information collection proposed will tell the story of Community Action - but it only will tell a portion of that story. From an initial review of the proposed collection, a significant focus has been placed on emergency or transactional services rather than longer term transformational work. For example, in the employment section, while obtaining skills necessary for employment is a very important first step - it is just that - a first step. By no longer	Request Change Accepted	OCS acknowledges this comment. The employment outcome was restored in the report. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
169	Georgia Del Freo	Community Action Association of PA	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] The information to be collected does not appear to be overly burdensome. By aligning data collection methods to the Census, etc. that will be helpful in the data collection system.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
170	Georgia Del Freo	Community Action Association of PA	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Additions need to be made to include performance indicators back into the collection method that show the full transformation of the individual who is being supported. What is the impact of the work beyond the service - by modifying several of the National Performance Indicators to eliminate the need for pre/post result changes - the impact is no longer being achieved.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
171	Georgia Del Freo	Community Action Association of PA	[In response to question "The quality of the information to be collected."] While I appreciate the connection of the services to outcomes, the proposed data collection will water down the work that is being done - mainly collecting the services and not the longer term outcomes and transformations.	Alternative Response	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency
172	John Litz	Allegheny County Department of Human Services	With regards to new domain, transportation, I looked at that domain and the services listed. In our community one of the things we're doing that is not listed is car repairs, assistance with insurance premiums, assistance with car payments, membership to AAA. Will be reported out in proposed changes as concrete supports, but in some ways it involves to me concrete supports (like gas card, voucher for public transportation). In new domain like transportation if you have listing of services, I recommend including more services at local level that are helping people maintain jobs or obtain jobs through private transportation (public	Request Change Accepted	OCS accepts this edit and has added SRV 7g to include all forms of automotive support for payments, repairs, insurance, and memberships.
173	Leidy Borges-Gonzalez	Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc.	Haven't reviewed whole process yet. I haven't seen anything supporting recording immigrant community.	Alternative Response	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency
174	John Litz	Allegheny County Department of Human Services	Noticed in domain for revised FNPIs under health and nutrition domain, first indicator 5a (number of individuals served who improved health and well-being through preventative measures). When you think of preventative you think immunizations, annual physicals, etc. I don't see anything involving medical treatment or some intervention that addresses specific problem in health domain. If you want to be inclusive and capture data points that reflects people served by community action agencies in health area, have indicator that speaks also to intervention or treatment measure	Request Change Accepted	OCS accepts this edit and added FNPI 5c to reflect health services leading to a resolved health issue.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
175	Valerie Stock	Chautauqua Opportunities, Inc.	FNPI 5D now is individuals receiving wellness services. It previously was the number of individuals who improved skills in parenting and caregiving (an area we use with our fatherhood programs). Will that be found somewhere else or could that be added?	Request Change Not Accepted	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency
176	John Litz	Allegheny County Department of Human Services	FNPIs are scaled back significantly. 9 in current report while proposed report includes 3. I'm concerned with how they are worded. FNPI 1B (number of unemployed adults who increased skills to obtain employment). Confusing--does that mean an unemployed adult who increased skills who obtained employment? Or an unemployed adult who increased skills but doesn't necessarily subsequently obtain employment? We're used to reporting on who gained employment. We know it's up to a living wage or greater. No language relative to that. Or more importantly it's the wording of the measures. What is exactly being measured? We	Alternative Response	OCS acknowledges this comment and notes that the previous structure doesn't show a correlation between the service and the outcome. If the service is increasing the skills that lead to employment there is a way to demonstrate a connection. The previous structure made an inference without being able to validate how the service lead to the outcome. We are measuring employment through the increase of skills. So an individual attended a resume writing and interviewing course (skill FNPI 1a and FNPI 1b) that led to them getting a job interview and ultimately hired (FNPI 1d
177	Rebecca Fields-Santin	Tennessee Department of Human Services	I agree with this comment [0502JOHLIT3] - (Rebecca, Tennessee)- self sufficiency programming as another term	Alternative Response	OCS acknowledges this comment and notes that the previous structure doesn't show a correlation between the service and the outcome. If the service is increasing the skills that lead to employment there is a way to demonstrate a connection. The previous structure made an inference without being able to validate how the service lead to the outcome. We are measuring employment through the increase of skills. So an individual attended a resume writing and interviewing course (skill) that led to them getting a job interview and ultimately hired.
178	Georgia Del Freo	Community Action Association of PA	Building on what John said, I appreciate what we're hearing on reducing burden. However, I have some concerns that we are watering down the story of community action and the longer term work we are doing. Like obtaining employment vs just obtaining skills. Similarly in education. Looking just at number of kids enrolled in services versus performing at grade level or improving. Consider a lot of indicators are already tracked through other funding streams such as Head Start, Early Head Start, and WIOA so collecting it for this is not necessarily an additional burden.	Alternative Response	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services Related to the measuring of outcomes, in the current reporting structure without consistent mechanisms to verify validity in pre/post of services it creates issues with the validity of the data reported. The updated language aims to show a connection between the services provided and how they ultimately lead to outcomes. There are also data points that may be specific to one agency
179	John Litz	Allegheny County Department of Human Services	Regarding the proposal to remove services that support multiple domains. One particular service within cluster - case management, not being anywhere in overall reporting structure is a concern. I don't think I'm alone in sharing observation that by it's absence we are not giving due credit to incredible front line workers, service coordinators, etc. They are performing case management. Maybe that term isn't the best term to use but that's the term in the current report. If this term substituted by another term in future, network could consider that. But it's critical.	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under **Service Delivery and Access.** The goal with this updated revision is to capture the component of the story of how individuals are connected to
180	Valerie Stock	Chautauqua Opportunities, Inc.	Based on last two folks [0502GEODEL1 and 0502JOHLIT4]. I'm looking and comparing. Agree. We're going to be doing a lot of work that won't be counted that should be.	Alternative Response	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
181	Denise Steinbach	Community Action Partnership Region I & VIII	Along the lines of the previous two commenters. With push towards 2-Gen whole family approach. I appreciate the effort to condense outcomes, and coming from small state I'll say yay, but looking from perspective of lifting up families. I don't have current list of FPNIs for education, but there were references to more family outcomes. So I think that too is missing in this because there are individual and family performance indicators. If that could be more encompassing, I think that would be helpful in telling that story as well.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
182	Allison Ma'luf	Community Action Program Legal Services (CAPLAW)	I wanted to give broader context on the concern that would be helpful to address with CSBG and services provided it's based on needs in community. Lots of attempt to capture how we're supporting communities in a common way and that can be challenging. Would be helpful to hear, with respect to the changes, how that is being recognized or addressed with respect to those changes. Needs addressed as required to addressed by needs assessments. How are we translating that to showing outcomes?	Alternative Response	OCS has proposed in the updated collection and connection between services to outcomes to demonstrate the greater outcomes of communities and the performance of local agencies in meeting the goals of CSBG.
183	Rebecca Fields-Santin	Tennessee Department of Human Services	When looking at outcomes and services. Outcomes. Very much a fan. Newer to CSBG at state level. Big fan of “Other” section. Don't think it's utilized enough. It gives some room for autonomy for different agencies. I don't know if that can be incorporated back. I know there is comment section. Each agency individual that's collecting will know how to include those things. Want it to be utilized more.	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an ‘other’ with requirement of description.
184	William Nicholson	Community Action Program for Madison County, Inc.	I want to echo the comments about the removal of case management, eligibility determination, and referral services. These demonstrate a crucial role of a CAA in a community that is separate from specific program and services. These use a significant commitment of time and resources by agency.	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under **Service Delivery and Access.** The goal with this updated revision is to capture the component of the story of how individuals are connected to
185	David Hagen	Hawkeye Area Community Action Program, Inc.	Hi, you will need to add Transportation to the CA network national theory of change illustration.	Alternative Response	OCS thanks you for this comment and plans to update the federal training and technical assistance materials to reflect the report once approved. The Theory of Change is a component of understanding community action driven by stakeholders and not the federal office as it does not comport with the statutory goals of CSBG and HHS along with the Government Accountability Office (GAO) has noted the federal office must ensure it aligns its performance measures and subsequent materials to the three goals of CSBG as opined in the law.
186	David Hagen	Hawkeye Area Community Action Program, Inc.	FYI, posting these the end of May reduces the response time to a month.	Alternative Response	OCS acknowledges this comment and highlights the Dear Colleague Letter indicates the first date for the public to comment was April 22nd which was the date the White House Office of Management and Budget published the FRN. OCS held the listening sessions as a supplement to gather feedback but the 60-day period began in April.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
187	Karen Keith	Texas Department of Housing and Community Affairs	[In response to question "Is the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies?] Yes, however, there are data points that are good points that have been eliminated.	Alternative Response	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency
188	Karen Keith	Texas Department of Housing and Community Affairs	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] If data is collected in the customer software, then reporting should be easier to collect.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
189	Karen Keith	Texas Department of Housing and Community Affairs	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] 90 day tracking for employment to ensure customers are doing well, rather than just checking a box showing a job was obtained	Request Change Not Accepted	OCS acknowledges this comment and considered the burden and reliability of data when employment tracking in 30 day increments may be difficult to accurately capture. OCS has updated the employment doman to include an employment FNPI for both youth and adults.
190	Karen Keith	Texas Department of Housing and Community Affairs	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."]Many agencies have stated that data is too much work, so reporting is minimal, however, data is the only way to see whether the story aligns to the expenditures	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
191	Trisha Wilkins	Northeast Iowa Community Action Corporation	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Yes - in our agency, there are several databases being used and the collection for CSBG data creates lots of time to gather. In addition, the requirement for unduplicated data is nearly impossible when pulling household information for a variety of databases, which will lead to underreporting our results	Alternative Response	OCS acknowledges this comment and appreciates the feedback. In the updated reporting structure we worked to reduce some of what's collected and increase flexibility around the unit of measurement. For example, if it's the number of units for a particular service, we would count that such as the number of childcare subsidies and non-medical transportation vouchers. This
192	Trisha Wilkins	Northeast Iowa Community Action Corporation	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Remove the CSBG characteristics that includes the requirement for unduplicated individuals and households served	Request Change Not Accepted	OCS in ensuring we are responding to the findings from the Government Accountability Office (GAO) utilizes the total number served to capture totals for national performance reporting.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
193	Melissa McClain	Community Action Kentucky, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Unemployed individuals obtain a job needs to be added back in. This is part of the CSBG Act.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
194	Melissa McClain	Community Action Kentucky, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Under Module 3a Services - shouldn't SRV 3d be moved to the Transportation Domain?	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
195	Melissa McClain	Community Action Kentucky, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Under Module 3b NPIs - there are no services to tie back to the new/revised NPI 3b or 3c.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
196	Melissa McClain	Community Action Kentucky, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Module 3b - 2e The number of individuals who enrolled - enrolled is a service and does not show a change.	Alternative Response	OCS acknowledges this comments and notes that Module 3 2e is a service which captures an outcome, the outputs are in Section B.
197	Melissa McClain	Community Action Kentucky, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Module 3b - Health and Social/Behavioral Development - the majority of these NPIs are services, they do not show a change (outcome). Using words - served, access, receiving. These do not show a change but only shows the individuals have been served.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
198	Michelle Fields	Nashville & Davidson County, Metropolitan Government of	[In response to question "Is the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies?"] In general, I think it's important to understand the impact Community Action, federal, state, and local funds have on improving the lives of those we serve. I however, cannot comment at this time on what is actullay being asked since I have not had ample time to review the updates.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
199	Michelle Fields	Nashville & Davidson County, Metropolitan Government of	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] In general, it should not be a burden. It should always be incorporated as a part of our work through a process of quality improvement. It sounds like the overall burden has been reduced significantly. An integrated, universal system, for all federal, state, and local dollars would significally improve fiscal accountability, data analytics and reporting.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
200	Michelle Fields	Nashville & Davidson County, Metropolitan Government of	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] I cannot answer at this time. I need more time to review the updates.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
201	Michelle Fields	Nashville & Davidson County, Metropolitan Government of	[In response to question "The quality of the information to be collected."] It's been a missed opportunity since the implementation of the CSBG AR, when OCS eliminated the opportunity to provide qualitative updates to highlight success stories, organizational, and community changes that have been implemented. These stories helped one to really understand the changes/updates in the data.	Alternative Response	OCS acknowledges this comment and aims to highlight innovative solutions and community level transformation emphasis as seen in the OCS spotlight videos and highlights. Our goal is address the burden for the public and then continue expanding telling the qualitative stories. We encourage grant recipients and sub recipients to use the Community Level Transformation to tell those rich stories filled with qualitative data.
202	Michelle Fields	Nashville & Davidson County, Metropolitan Government of	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."] I believe that varies on the size of the organization and their ability to establish integrative reporting.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
203	Andrea Olson	Community Action Partnership of North Dakota	[In response to question "The quality of the information to be collected."] I love the idea of certain services being collected as Concrete Supports that have the outcome of economic mobility. Transportation, childcare, clothing (work), and utilities, rent are all critical to moving forward in other areas but are not, by themselves, services that eradicate poverty.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
204	Alexis Cruz	Community Action Partnership of Lancaster and Saunders Counties, Inc.	[In response to question "Is the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies?"] It depends on what you consider proper performance.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
205	Alexis Cruz	Community Action Partnership of Lancaster and Saunders Counties, Inc.	[In response to questions "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?" "The quality of the information to be collected." "The clarity of the information to be collected"] It's all a burden when you have to mix and match the different fenderal reports. What is one indicator in the HUD reports is a different indicator in the CSBG reports is a different indicator at Head Start. All the language is different which provides no continuitity for participants which leads to confusion	Alternative Response	OCS acknowledges this comment and appreciates the feedback. We have worked to reduce the number of indicators that are found in other reports to minimize that burden on the public.
206	Jaquinda Smith	Niagara Community Action Program, Inc.	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] Yes, I believe the proposed collection of information is necessary for the proper performance measurement of Federal, State and local agencies.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
207	Jaquinda Smith	Niagara Community Action Program, Inc.	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] No the information to be collected does not produce a significant burden.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
208	Jaquinda Smith	Niagara Community Action Program, Inc.	[In response to question "The quality of the information to be collected."] I believe the quality of information will be useful in determining what services and programs are beneficial to the served community.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
209	Krista Wood	Southeast Arkansas Community Action Corporation, Inc.	[In response to question "Is the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies?"] This is my first time working with CSBG data besides demographic data, I don't feel qualified for answering this.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
210	Krista Wood	Southeast Arkansas Community Action Corporation, Inc.	[In response to questions" "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?" "What, if any, additions, revisions or modifications to the information collection would you suggest?" "The quality of the information to be collected." "The clarity of the information to be collected." "The accuracy of the agency's estimate of the burden of the proposed collection of information."] I'm not sure, as this is my first experience wit CSGB data besides the demographics.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
211	Amanda Burns	Community Action Program of Lancaster County	[In response to question "Is the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies?"] Not sure	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
212	Amanda Burns	Community Action Program of Lancaster County	[In response quetion " Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Yes, we will have to do an overhual of cross referencing the outcomes to programming and making sure other leaders and staff understand any changes that impact reporting. This will require additional training.	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical
213	Amanda Burns	Community Action Program of Lancaster County	[In response to quesiotn "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technolog?] I would encourage producing resources ASAP for those who want to adopt 3.0 for 2025 as the work internally at agencies will be a lot.	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical
214	Amanda Burns	Community Action Program of Lancaster County	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Appreciate the 2 implementation options	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
215	Dawn van Hees	Lakes and Pines Community Action Council	[In response to question "Is the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies?"] I do think this information collected is important to telling the story of Community Action. I like what I am seeing with the merging of some of SRVs, I think that will be more useful.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
216	Dawn van Hees	Lakes and Pines Community Action Council	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Under civic engagement, I would like to include other Boards such as Head Start Policy Council. That is important as well.	Request Change Not Accepted	OCS acknowledges this comment and notes that the aim in this collection is to balance telling the story of CSBG through performance while also ensuring there isn't a significant burden. Because not all agencies operate Head Start, we have streamlined what's reported. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
217	Dawn van Hees	Lakes and Pines Community Action Council	[In response to question "The quality of the information to be collected."] Many of these questions have a great quality and is much more understandable.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
218	Dawn van Hees	Lakes and Pines Community Action Council	[In response to question "The clarity of the information to be collected]. At first look, this information is much clearer. I appreciate that.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
219	Jacqueline Orr	New York State (NYS) Community Action Association, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] I would suggest adding an employment NPI. "The number of individuals who obtained a job."	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
220	Jacqueline Orr	New York State (NYS) Community Action Association, Inc.	[In response to quesiton "The quality of the information to be collected.] In the health and nutrition serices domain, the FNPIs read more like a service: "The number of individuals receiving wellness services." The word "receiving" is also used when describing services. The outcomes should reflect a change that happened after receiving the service, such as. "Individuals who then improved their wellness/overall health. This can also be seen in other domains like FNPI 2a where the NPI references "enrolled" in childcare. The indicator should be the change as a result of receiving childcare.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
221	LaVonne Erskine	Economic Opportunity Commission of Nassau County, Inc.	[In response to question "The quality of the information to be collected."] Accuracy: there should be no errors in the data, Relevance; your data should only include fields that you actually need and information that you intended to collect.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
222	Sherran Campos	Yakima Valley Farmworkers Clinic / Northwest Community Action Center	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] This will be burdensome in the beginning of this change. We will need to update our software system and training staff of how changes will impact them and their program.	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
223	Niema Winchesterq	Louisiana Workforce Commission	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] In review of the Annual Report Version 3.0 I didnt see any outcomes related to the addtion of transportation as a service.	Alternative Response	OCS acknowledges this comment and empahsizes multiple services often contribute to one outcome and the aim is to identify the service that typicially has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was utimately designed to primarily target. Transportation is a concrete support and service that can impact multiple outcomes and absent a way to measure if that gas card led to an outcome, there may be questions on the validity of the performance indicator therefore, these are counted as
224	Jeff Fondelier	Blueprints	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] it seems like the information to be collected will reduce the burden.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
225	Lisa Benson	Champaign County Regional Planning Commission	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies. "] More closely tracking connection between service and outcomes will be helpful, however utilizing more relevant outcomes in state programs would further assist.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
226	Lisa Benson	Champaign County Regional Planning Commission	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Updating the accuracy of reporting systems to inuitively capture data and clearly report what is being required would be helpful. Potentially, having reports aligned with the required areas of information.	Alternative Response	OCS acknowledges this comment and appreciates the feedback specific to report alignment. We worked to remove some indicators that are reported in other federal reports to minimize that burden.
227	Jamie Chandler	Aroostook County Action Program, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] There were a number of added /revised FNPI outcomes. ROMA is extremely important to our network. I would suggest looking at the new outcomes language to ensure it aligns with measureable outcomes and not interpreted as services.	Alternative Response	OCS acknowledges this comment and appreciates the feedback. The report revisions were to to ensure we addressed the expansive nature of performance measures across CSBG while meeting the requirements of the CSBG Act, the findings of the CSBG Government Accountability Office (GAO) report, and minimize the burden on the public under the Paperwork Reduction Act. The connection between service to outcome also enhances how we tell the national story of CSBG.
228	Belinda Estes	Northeast Iowa Community Action Corporation	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] So far from what I'm seeing, I'm agreeing with the potential for the services cascading into certain outcomes.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
229	Belinda Estes	Northeast Iowa Community Action Corporation	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Before 2018 the housing outcome was obtaining and/or maintaining housing. It would be nice to have an outcome back that is specific to maintaining housing, which has become increasingly difficult for many families in today's housing market. I feel like that showing how many families who we have helped maintain their housing is just as, if not more, important than reflecting how many have obtained.	Request Change Not Accepted	OCS acknowledges this comment and recognizes the importance, but the capture of maintaining housing can be difficult to collect and produce both substanial burden to track that metric and track in and produce valid results. Without a methodology to confirm the tracking of this is consistent there are issues on the reliability of data when aggregated at a national level. OCS does recognize that there are uniquely tailored approaches within some subrecipients and encourages the use of the 'Other' for services and indicators to capture data that reflects elements specific to
230	Belinda Estes	Northeast Iowa Community Action Corporation	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."] I'm interested to see how accurate this turns out to be. As an agency who is currently going through a transfer to a new database, we are currently reaching out to our new software company to make sure they are following these changes since they are relatively new to CSBG Annual reports. Taking into account the change over between agency tracking, software tracking, and then statewide data entry for our lead agency as a whole, I wonder if these numbers are correct.	Alternative Response	OCS acknowledges this comment and shares that during the two year phased implementation, we will increase our training and technical assistance on these reporting structures and as we currently provide the coding for databases at no-cost, we will continue to so systems can be updated to reflect the collection of information.
231	Alexander Caro	Community Action Partnership of Orange County	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies. " yes absolutely.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
232	Alexander Caro	Community Action Partnership of Orange County	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Some burden since we have to go in and update client data collection documentation and also our software systems.	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical
233	Colleen Homb	Lakeshore CAP, Inc. of Wisconsin	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies. "] I haven't have the opportunity to review these changes prior to this meeting. I don't feel I can adequately answer this at this time.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
234	Colleen Homb	Lakeshore CAP, Inc. of Wisconsin	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] I'm unsure due to my newness to these proprosed changes. However, I would request some very specific instructions regarding how to measure each outcome. There is some ambiguity with some of the current definitions in the instructions for the outcomes module.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
235	Rhea Woods	Louisiana Workforce Commission	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies. "] I'm concerned about whether the proposed collection will enhance or detract from performance measurement of CAAs and long-term impacts on reducing poverty. I need to review the DCL and attachments in detail and will do so.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
236	Rhea Woods	Louisiana Workforce Commission	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] We've spent a lot of time stressing outcomes over services and ensuring that our data collection systems coincide and support that emphasis. This seems to reverse our focus. I need to read the DCL more thoroughly and review the attachments to give a better response.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
237	Rhea Woods	Louisiana Workforce Commission	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] We need to continue the push for outcomes that move the needle over services. We need to be able to justify that the funding is making a difference in our communities or our State may decide it is only making people more dependent.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
238	Mary Randall	Pathstone Corporation	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies. "] Yes, the combination of repetative data points is welcomed change. The streamlining of data points and submission will reduce time needed to prepare this report.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
239	Mary Randall	Pathstone Corporation	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] NPI's - drop down selection box - will allow for multiple indicatorsLinked info between pages (name, year, etc.)	Alternative Response	OCS acknowledges this comment. During the technical assistance and updates to our materials for local agencies, we will explore including some additional automated functions for data collection in the Smart Forms used by sub grant recipients.
240	Mary Randall	Pathstone Corporation	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Drop down boxes for indicatorsauto population of standard infoSum total for sections (demographics)Online submission of information	Alternative Response	OCS acknowledges this comment. During the technical assistance and updates to our materials for local agencies, we will explore including some additional automated functions for data collection in the Smart Forms used by sub grant recipients. While OCS would ideally consider direct data entry for all potential 56 state and territory grant recipients, 66 tribal grant recipients, and nearly 1,000 sub grant recipients, at this time we do not have the capacity, so we rely on enhancing low cost tools like Smart Forms to use within our current systems.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
241	Mary Randall	Pathstone Corporation	[In response to question "The quality of the information to be collected."] Appears to be standardized for Fed usage.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
242	Mary Randall	Pathstone Corporation	[In response to question "The clarity of the information to be collected."] while agency provision of services range the full spectrum, it would be helpful to have 'examples' of information and/or identification of indicator/information type	Alternative Response	OCS acknowledges and appreciates this feedback. During the first year post-OMB approval, the reporting structure will remain exactly the same and provide the federal office with time to update materials and work on a robust technical assistance plan to support states that have a wide array of data collection strategies. So during this time, we will begin working with our funded partners to update SmartForms, update database coding and validations for states that operate databases available at no cost, and release policy, guidance, and communications to support the
243	Mary Randall	Pathstone Corporation	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."] This is a MONSTER of a report to put together. Staff dedicate a large number of hours to compile and report outcomes. Streamline the repeative information. Online submission of data would be welcomed.	Alternative Response	OCS acknowledges this comment. During the technical assistance and updates to our materials for local agencies, we will explore including some additional automated functions for data collection in the Smart Forms used by sub grant recipients. While OCS would ideally consider direct data entry for all potential 56 state and territory grant recipients, 66 tribal grant recipients, and nearly 1,000 sub grant recipients, at this time we do not have the capacity, so we rely on enhancing low cost tools like Smart Forms to use within our current systems.
244	Charlaine Mazzei	Del Norte Senior Center, Inc.	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies. "] It isn't clear whether the collection of data is necessary.	Alternative Response	OCS acknowledges this comment and appreciates the feedback. The annual report meets the requirement for the federal office that administers and funds the Community Service Block Grant to furnish a national performance report.
245	Charlaine Mazzei	Del Norte Senior Center, Inc.	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies. "] Since CSBG is so locally-driven, trying to aggregate common data on a national level is bound to leave out significant accomplishments happening in individual service territories.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
246	Charlaine Mazzei	Del Norte Senior Center, Inc.	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Collection of unduplicated data across programs that mandate different data collection and reporting systems is challenging. The only way that these reporting burdens can be addressed is if electronic data transfer systems can be set up between disparate databases controlled by different vendors and agencies. This is highly unlikely to be achievable and would be extremely	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
247	Charlaine Mazzei	Del Norte Senior Center, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] CSBG definition of a senior as 65 and older is inconsistent with Older Americans Act definition of 60 and older and HUD definition of 62 and older. Reporting needs to be mindful that restricting reporting to 65 and older will leave out services and outcomes for a large number of those served by these programs.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
248	Charlaine Mazzei	Del Norte Senior Center, Inc.	[In response to question "The quality of the information to be collected."] The quality of the information will depend on how difficult it is to collect at the local level. The data in the All Characterisitcs report is almost certain to be either underreported or overreported because of the difficulty of getting unduplicated counts of clients who participate in multiple programs that use incompatible eligibility, reporting and data collection systems.	Alternative Response	OCS acknowledges this comment and appreciates the feedback. The annual report meets the requirement for the federal office that administers and funds the Community Service Block Grant to furnish a national performance report.
249	Charlaine Mazzei	Del Norte Senior Center, Inc.	[In response to question "The clarity of the information to be collected." Appreciate clarifying that providing some services, such as a meal, produces an outcome in itself and does not require pre- and post-testing to be valid. The prior understanding that outcomes had to be documented in this way produced such a burden that we often did not report some services.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
250	Charlaine Mazzei	Del Norte Senior Center, Inc.	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."] Data collection estimates do not take into account the difficulty in collecting the data as services are being provided.	Alternative Response	Thank you for this comment. OCS is keenly aware of the burden data collection, analysis, and reporting may have on the CSBG Network. Over time, we anticipate the burden will decrease as systems are developed or modified and as staff gain experience with reporting and analysis. OCS is planning a phased-in implementation approach for the new reporting requirements to allow the states and local agencies time to adjust systems, update processes and procedures, and train staff. We will also consider this as we finalize estimates for the time required to prepare the annual
251	Becky Himlin	Community Action Pioneer Valley, Inc.	I realize you won't be able to respond, but in some ways my audience is everyone listening because I would like us to have some similar themes that I would like you would to hear. One, the process. I was involved in many of the consultation opportunities for the Results Oriented Management and Accountability (ROMA) Next Generation which produced framework. This 60-day period and suddenly implementing the annual report changes is really not I think respectful of all the work that went into the framework. I think more consultation time is needed. I didn't hear about this from the National Community Action Partnership, from state	Alternative Response	OCS acknowledges and appreciates this feedback. During the first year post-OMB approval, the reporting structure will remain exactly the same and provide the federal office with time to update materials and work on a robust technical assistance plan to support states that have a wide array of data collection strategies. So during this time, we will begin working with our funded partners to update SmartForms, update database coding and validations for states that operate databases available at no cost, and release policy, guidance, and communications to support the
252	Becky Himlin	Community Action Pioneer Valley, Inc.	Second, really critical to my agency's bottom line is the amount of money and effort it will to take to change our data systems again. Most of us have data vendors so we can't do this on our own. The time and money to change module 4 (which will be module 3) is really not being taken into consideration. Without additional funds, I think this is a really big problem.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that are underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
253	Lupe Camacho	Riverside, County of	Want to support the previous agency that just spoke up about the financial burden we are going to face. We, being part of the county, our technology is not as well developed as we would like. So technological divide to collect this information, ensure accuracy, and audit it - that requires technological increase that is going to be costly. Costly not just for automation but also for staff to manage/administer it. Wanted to voice that because I certainly see it very clearly with what we have now. County being such a large entity, bit challenging to increase technological automation. Consistently working towards that. But in timeframe we are working	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that are underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
254	Lily Rivera-Graves	Community Services & Employment Training, Inc.	I was on the very first listening session. I went ahead and took notes on that session and took it back to my desk. I prepared a crosswalk for myself between current annual report and compared to new proposed changes for peace of mind. One thing I wanted to ask, on services (not so much on NPIs), a lot indicated as merged/streamlined to reduce burden. This takes away a lot of indicators, including current SRVs. What I didn't get from the document, not all say where they were merged. It did say for a couple of indicators, but not all of them. Staff on my end/our data analysts asked where did it go? We never want to assume with	Alternative Response	OCS acknowledges and appreciates this feedback. During the first year post-OMB approval, the reporting structure will remain exactly the same and provide the federal office with time to update materials and work on a robust technical assistance plan to support states that have a wide array of data collection strategies. So during this time, we will begin working with our funded partners to update SmartForms, update database coding and validations for states that operate databases available at no cost, and release policy, guidance, and communications to support the
255	Lupe Camacho	Riverside, County of	[In response to question "Is the proposed collection of information necessary for the proper performance measurement of Federal, State, or local agencies?"] Yes	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
256	Lupe Camacho	Riverside, County of	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Yes, it does. Financial assistance for implementation of automated collection system and a team of staff members to administer and manage the collection system.	Alternative Response	OCS acknowledges this comment and shares that during the two year phased implementation, we will increase our training and technical assistance on these reporting structures and as we currently provide the coding for databases at no-cost, we will continue to so systems can be updated to reflect the collection of information. OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module
257	Lupe Camacho	Riverside, County of	[In response to question "What, if any, additions, revisions, or modifications to the information collection would you suggest?"] None at this time.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
258	Lupe Camacho	Riverside, County of	[In response to question "What is the accuracy of the agency's estimate of the burden of the proposed collection of information?"] Not very accurate of financial burden to implement the proposed collection of information at this time.Staff and technology would need to be procured to collect the information and the timeframe is something that would be a significat challange for us.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that are underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
259	Enedelia Ornelas Torres	Los Angeles, County of	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Would recommend minimizing the data points being requested for the "All Characteristics Report", which has been a significant burden for many agencies to collect, especially when the people needing services are often weary or suspicious of providing data.	Alternative Response	OCS acknowledges this comment and has worked to reduce the amount of nominal data contained in the All Characteristics Report.
260	Enedelia Ornelas Torres	Los Angeles, County of	[In response to question "What, if any, additions, revisions, or modifications to the information collection would you suggest?"] Recommend adding/keeping case management and legal services as indicators since there is a need for these services in the los angeles area.	Alternative Response	OCS has restored case management in a separate element of the report specific to service delivery and access. The legal services indicator is one that is underutilized by subrecipients, but we recognize the importance of the these data elements at the local level and encourage grant recipients to retain data for their own local and state reporting purposes.
261	Tammy Jeffs	Community Action Partnership of Mid-Nebraska	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Can you repeat- are we reporting outputs and OCS converts to Outcomes? Ex. we report rent and OCS moves it to obtain/ maintain housing.	Alternative Response	OCS is continuing to collect both services (outputs) and outcomes (performance indicators).
262	Bambi Baughn	Community Action Commission of Fayette County	[In response to question "Is the proposed collection of information necessary for the proper performance measurement of Federal, State, or local agencies?"] When we submit expenditures, if it is different from past submissions, we have to respond to a warning about why they amount of that expenditure is greater or lesser than the past year. I believe this is un-necessary information - what difference does it make if we received more or less funds from another funding source? Only the information from that reporting period should be of any interest to OCS.	Alternative Response	OCS appreciates this feedback and will continue to examine the current validations that exist within the reporting structure.
263	Bambi Baughn	Community Action Commission of Fayette County	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Our state data collection system does not allow agencies to see information we enter into the system for Client Characteristics.	Alternative Response	OCS acknowledges this comment and encourages collaboration between grant recipients (states) and sub grant recipients (local agencies) in understanding and accessing submitted data. OCS is expanding access to the CSBG Performance Management Website where local agencies will have the opportunity to view their data submit for each fiscal year. We will provide more information through the CSBG Policy and Guidance website.
264	Alan Jones	Adirondack Community Action Programs, Inc.	[In response to question "Is the proposed collection of information necessary for the proper performance measurement of Federal, State, or local agencies?"] Yes	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
265	Alan Jones	Adirondack Community Action Programs, Inc.	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] No	Alternative Response	OCS acknowledges this comment and appreciates the feedback.
266	Nathan J. Keirns on behalf of Leads	LEADS Inc.	I applaud HHS's interest and work in streamlining CSBG reporting and related processes. Community Actions have a long history of working on community issues at the ground level. The flexibilities provided by CSBG allow us to meet emerging needs and to design services that address the unique challenges and reflect the unique opportunities in our communities. Community Actions are proud to have CSBG as a part of our toolkit as we tackle poverty issues head on. It is part of what allows us to help families go from crisis to stability and from being stable to thriving. While CSBG plays a large role in our agencies and in our identity	Alternative Response	OCS acknowledges this comment and appreciates the feedback. A critical reason for reviewing the report is to address burden and consider how it impacts equity when comparing the administrative burden to that of service delivery.
267	Anwen Cook on behalf of Chelan-Douglas Community Action Council	Chelan-Douglas Community Action Council	(1. Whether the proposed collection of information is necessary for the proper performance measurement of federal, state, or local agencies.) I fully support having a CSBG report to measure our agency's performance. It has provided a useful framework for us to gain a clear picture of what we do and the impact we have.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
268	Anwen Cook on behalf of Chelan-Douglas Community Action Council	Chelan-Douglas Community Action Council	(2. The quality of the information to be collected.) a. Employment FNPIs (module 3, page 32): It is unfortunate that there is no FNPI to report individuals who obtain employment. This is such a key milestone for some individuals who are transitioning out of poverty, and it is something we work with people on within many of our programs.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
269	Anwen Cook on behalf of Chelan-Douglas Community Action Council	Chelan-Douglas Community Action Council	(2. The quality of the information to be collected.) b. Education and Youth Development FNPIs (module 3, page 33): It is unfortunate that there is no way to report an increase in skills, especially for adults. It appears that the only FNPIs to report for adults in this domain are 2c through 2f, all of which relate to obtaining credentials or enrolling in higher education. This bar is too high for CSBG-eligible entities like ours who operate valuable community-based adult education programs with high-quality pre-testing and posttesting but are not accredited to provide these kinds of credentials. We have a whole program dedicated to English	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
270	Anwen Cook on behalf of Chelan-Douglas Community Action Council	Chelan-Douglas Community Action Council	(2. The quality of the information to be collected.) c. All FNPIs (module 3, pages 32-37): It is my understanding that CSBG Services measure outputs, while FNPIs measure outcomes. We place a great deal of emphasis on the difference between the two when educating staff on the importance of data collection, and we strongly encourage programs to value measuring outcomes. The wording of several of the new FNPIs read as restatements of the corresponding services and do not reflect actual outcomes in the individuals' lives. This does not give us a strong framework to present to staff when asking them to value measuring	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
271	Anwen Cook on behalf of Chelan-Douglas Community Action Council	Chelan-Douglas Community Action Council	(3. The clarity of the information to be collected.) a. SRV 3d (module 3, page 26)- I am curious if this service is necessary to include in Asset Building, when it appears to belong more in the new transportation domain. Transportation could likewise also be provided to support all the other domains, but it only appears as a service for this domain. This seems to be an opportunity to further pare down the number of services we report on.	Request Change Accepted	OCS has updated this to correctly place transportation services in SRV 7.
272	Anwen Cook on behalf of Chelan-Douglas Community Action Council	Chelan-Douglas Community Action Council	(3. The clarity of the information to be collected.) b. Emergency Hygiene and Clothing Assistance (module 3, page 29): As worded, SRV 5t and 5u appear to count the number of services provided rather than the number of individuals served.	Alternative Response	OCS has expanded the counts for service beyond simply the number of individuals served as it can exacerbate the burden but instead restructured service counts to be inclusive of different units of measurement. So a local agency can report that in a year they provided 10,000 diapering supplies.
273	Anwen Cook on behalf of Chelan-Douglas Community Action Council	Chelan-Douglas Community Action Council	(3. The clarity of the information to be collected) c. FNPI 5f (module 3, page 36): "The number of individuals serve who then improved their mental health, behavioral health and well-being." "Serve" here should be replaced with "served." Also, I am curious if the intention is to only report individuals who improve in all three of these areas, or if only improving in one of the areas is sufficient (as in, the "and" is intended as an "and/or").	Request Change Accepted	OCS has updated this change the tense for this cited FNPI and added to or to reflect its either. The instructional materials will also be updated post-OMB approval.
274	Anwen Cook on behalf of Chelan-Douglas Community Action Council	Chelan-Douglas Community Action Council	(4. Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of collection.) The change in the type of information collected will produce a significant initial burden as we adapt to new expectations, select from a different list of services and FNPIs, and work with our CRM vendor to transition to data recording processes.	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical
275	Anwen Cook on behalf of Chelan-Douglas Community Action Council	Chelan-Douglas Community Action Council	(5. The accuracy of the agency's estimate of the burden of the proposed collection of information.) I do not anticipate that the proposed modifications will change the amount of time we spend collecting information by as much as claimed. The most time-consuming part of CSBG data collection is entering households into our CRM so we can obtain an unduplicated count of those we serve (something I would not want to change as I value the integrity of our report in that respect). Other time-consuming tasks include reviewing and cleaning data in our CRM. Having many options available to us as metrics does not pose a great time burden as we select	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical
276	Anwen Cook on behalf of Chelan-Douglas Community Action Council	Chelan-Douglas Community Action Council	(6. What, if any, additions, revisions, or modifications to the information collection would you suggest?) a. "The number of individuals that" present in several service descriptions (e.g. module 3, pages 26 and 27) would be more grammatically consistent if changed to, "The number of individuals who." Or, these statements could be changed to the present progressive to eliminate "that" or "who" altogether.	Request Change Accepted	OCS has updated the verbs throughout all SRV to be past tense for reporting and the changed that to who when the unit of measurement is one singular person.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
277	Anwen Cook on behalf of Chelan-Douglas Community Action Council	Chelan-Douglas Community Action Council	(6. What, if any, additions, revisions, or modifications to the information collection would you suggest?) b. SRV 2e (module 3, page 25): “The number of individuals that receiving K-12 Support Services” would read better as “The number of individuals who are receiving K-12 Support Services” or “The number of individuals receiving K-12 Support Services”	Request Change Accepted	OCS has updated the verbs throughout all SRV to be past tense for reporting and the changed that to who when the unit of measurement is one singular person.
278	Anwen Cook on behalf of Chelan-Douglas Community Action Council	Chelan-Douglas Community Action Council	(6. What, if any, additions, revisions, or modifications to the information collection would you suggest?) c. I am curious if collapsing the “High School Graduate” and “GED/Equivalency Diploma” (module 3, pages 38 and 39) categories in the demographics section would be feasible. Functionally, these yield the same outcomes and opportunities in individuals’ lives. Furthermore, some of our individual programs (significantly, LIHEAP) do not differentiate between these categories on intake. As a result, we face challenges reporting this accurately for CSBG since the categories are more specific.	Request Change Accepted	OCS has consolidated the High School Graduate and GED counts in recognition that they capture the same outcome and it could minimize burden for local agencies and streamlines it for other OCS reports.
279	Anwen Cook on behalf of Chelan-Douglas Community Action Council	Chelan-Douglas Community Action Council	(6. What, if any, additions, revisions, or modifications to the information collection would you suggest?) d. Likewise, it would significantly reduce our data collection burden if we were able to collapse the categories “Employed Full-Time” and “Employed Part Time” (module 3, page 40) as well as the various “Unemployed” categories. Another suggestion would be to gather information in this manner: Number of employed individuals: Of the above, the number employed full-time: Of the above, the number employed part-time: Number of unemployed individuals: Of the above, number unemployed 6 months or less: Of the above, number	Request Change Not Accepted	OCS acknowledges this comment and appreciates this feedback. A key goal of CSBG is helping individuals reach self-sufficiency and operationalizing that, we examine the ability of individuals to earn a living wage on the path to economic mobility to achieve self-sufficiency. By measuring the type of employment, we can exmine trends where individuals may obtain employment but not necessarily enough to cover basic living expenses in addition to wages and earnings to for an enhanced quality of life. Recognziing the potential burden, OCS will
280	Sharon Breitweiser	Albany County	The CSBG Board of Directors of Albany County, Wyoming submits this comment on the proposed Annual Report 3.0 Revisions: For the amount of money allocated, the reporting requirements are onerous and excessive and have increased exponentially over the last decade.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources to address system changes for a routine process such as updated information collection under the Paperwork
281	Laura Ponce	El Paso Community Action Program Project Bravo	The current process of reporting some data incentivises short-term solutions and services for clients that do not lead to long-term outcomes. For example, in order to count someone as transitioning out of poverty, the individual must be enrolled and achieve their outcomes within a calendar year.This has led us to only helping people with short-term training or enrolling people in the last year of their training. A more effective process would involve tracking individuals over multiple years and allowing TOP outcomes to be counted in any year, not just the year of enrollment. If we can show the person was enrolled at some point into the	Alternative Response	OCS acknowledges this comment and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS
282	Krista Dicomitis	HRDC, District IX	I am looking for clarification on concrete supports, and if these data points need to be unduplicated individuals or not. Considering they are not directly tied to a NPI and the demand this would require on staff to de-duplicate, I am hoping not.	Alternative Response	OCS acknowledges this comment and highlights that in the current reporting schema, there are several concrete supports (See AR 2.0 SRV 2k, SRV 2aa, SRV 2bb, SRV 3g, SRV 3m, SRV 3n, SRV 3p, SRV 3q, SRV 4c, SRV 4d, SRV 4e, SRV 4j, SRV 4k, SRV 5ii, SRV 5jj, SRV 5nn). The proposed changes aim to highlight what is a concrete support to demonstrate that much of the work of Community Action is also evidence-based in helping to lead to strengthened outcomes and self-sufficiency. The current reporting struture with the indicators do not show a relationship between the

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
283	Cassandra Norfleet-johnson	CT Department of Social Services	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Data collection elements should take into consideration the new required REL enthinicity items. It will be administrative burdensome to capture those data elements for other HHS funded programs and not CSBG.	Request Change Accepted	OCS has updated the race and ethnicity categories to align with the White Office of Management and Budget directive (SPD-15) on race and ethnic categories for federal reporting.
284	Cassandra Norfleet-johnson	CT Department of Social Services	[In response to question "The quality of the information to be collected. "] Quality of the data is only as good as the systems and tools are available. Additional resources will be required, however, this item appears to be silent.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources to address system changes for a routine process such as updated information collection under the Paperwork
285	Cassandra Norfleet-johnson	CT Department of Social Services	[In response to question "The clarity of the information to be collected. "] Without instructions for the tool, it is unfair to ask if the information is clear.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
286	Katie Neher	District XI Human Resource Council	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] Generally speaking, I believe so.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
287	Katie Neher	District XI Human Resource Council	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Yes. All information collection imposes a burden, and if the information is to be robust it always will be a significant burden. Instead of just minimizing the burden through things like automation/tech/changing questions, however, more attention should be paid to funding administration of CSBG-eligible entities. So much funding is strictly tied up in program activities, which	Alternative Response	OCS acknowledges this comment and recognizes the limitations that exist within appropriations. Our aim is to address the burden in the current period to maximize flexibility where possible.
288	Katie Neher	District XI Human Resource Council	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest? "] None at the moment—I need to become more familiar with the proposed changes first.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
289	Katie Neher	District XI Human Resource Council	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information. "] The estimate might be improved by also taking into consideration things like technical implementation, data clean-up, and training. All of these are key parts of the process of collecting information, and add significantly to the overall burden.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
290	Tamara Fahey	Massachusetts Department of Housing and Community Development	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Regarding reordering the Modules to move Community Level to Module 4, while this is a simple change in theory, for those who use a state system, it will require quite a bit of work (time + money) to make the change and update all references to M3-M4 throughout various instructions/guidances, etc. We would recomend not including that change if it is not critical.	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
291	Tamara Fahey	Massachusetts Department of Housing and Community Development	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] For Individual Family Level (new Module 3), Services 5t and 5u count items. It would be clearer if those services followed the same logic as all other services and counted individuals (or even households) that recieved those items. Having multiple types of counts (items vs. people) will confuse people and is likely to result in unanticipated duplicated counts for other services.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
292	Annaliza Gourneau	HELP-New Mexico	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies.] I like the new model and I think that change is good. I appreciate that a streamline process has occurred because this is time effective for all of us.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
293	Annaliza Gourneau	HELP-New Mexico	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] I do not think that the changes produce a significant barrier. Technology would need to be adapted. I really appreciate the "phase in" option.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
294	Annaliza Gourneau	HELP-New Mexico	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Time for adaptation. I would like to see the Smart forms in advance to provide feedback.	Alternative Response	OCS acknowledges this comment and will continue working during the implementation process to streamline the processes for release of Smart Forms.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
295	Annaliza Gourneau	HELP-New Mexico	[In response to question "The quality of the information to be collected. "] I like the service to outcome requirment because services feeds into the logic of what your intent is in terms of outcomes.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
296	Annaliza Gourneau	HELP-New Mexico	[In response to question "The clarity of the information to be collected. "] I think that overall the information timeframe will determine the output by agencies and redirecting, if required, can occur at that time. Maybe OCS cann build in a "walk through" the module training as needed.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
297	Annaliza Gourneau	HELP-New Mexico	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information.] I believe that OCS is allowing enough time for adaptation.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
298	Sara Lopez	Summit County Community and Senior Center	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies. "] Some of the information is important to have.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
299	Sara Lopez	Summit County Community and Senior Center	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] The collection of data does impose a huge burden on smaller entities that only have one person doing all the grants.	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
300	Sara Lopez	Summit County Community and Senior Center	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest? "] Reduce it.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
301	Arys Scott	Sacramento Employment and Training Agency	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] The biggest burden would be changing the reporting period to not match our states program period. It seems like it would be very burdensome to have to report in the middle of a program year.	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
302	Arys Scott	Sacramento Employment and Training Agency	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Also, since funding periods are 2 years long, how would the reporting period match up with this?	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
303	Arys Scott	Sacramento Employment and Training Agency	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] A way to fix this is to not change the reporting period OR change the program period as well to match the proposed reporting period change.	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
304	Arys Scott	Sacramento Employment and Training Agency	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] For programs who have Head Start numbers, it would be nice to have better clarity on how to report these numbers. Especially for CAAs who have head start and CSBG as separate programs that run separately. We keep getting asked on Head Start numbers but we do not take their information. It is also hard to gather head start information since they are on a fiscal year and we are on a calendar year.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
305	Denise Freeman	Community Services, Inc.	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] On the local level, I would think that combining some of the data points or FNPIs would cause difficulties in setting and meeting targets. I agree with the service to outcome outlook, but thismay lessen the tarrgets achieved.	Alternative Response	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job
306	Laura Cummings	Economic Opportunity Program, Inc. of Chemung County	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] In the past, when changes were made to the client characteristics form, we didn't know that until we were completing the annual report. As this is not information collected for the PPR, we need to know the changes sooner rather than later to update our data collection system.	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
307	Sarah Priest	Minnesota Department of Human Services	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] Re-odering Services and Outcomes is logical and appreciated. Pulling Community Level outcomes to the end (new Module 4) is smart as it's optional...	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
308	Sarah Priest	Minnesota Department of Human Services	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Seems like a decent reduction in burden ultimately.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
309	Laurie Chaplen	Community Services Consortium	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Yes, we use automation and concern that State agencies don't have ways to share our agencies clients from their systems and intergrate into our system. Changes for race/ethnicity and all values need to be standardized though out State agencies so that sharing and collecting can be easier.	Alternative Response	OCS acknowledges this comment and shares that during the two-year phased implementation, we will increase our training and technical assistance on these reporting structures and as we currently provide the coding for databases at no-cost, we will continue to so systems can be updated to reflect the collection of information. OCS also emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds
310	Aaron Wicks	Action for a Better Community, Inc.	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies. "] This collection instrument does not properly measure the performance of local CAAs. It treats services and outcomes as occuring in a vacuum, when CSBG is premised on precisely the opposite concept: that CAAs are needed to better foster collaboration and the leveraging of resources. The report falsely suggests that CAAs essentially use CSBG to produce discrete changes in customers' lives when in fact CSBG produces changes that occur over time and	Alternative Response	OCS acknowledges this comment and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS
311	Aaron Wicks	Action for a Better Community, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest? "] Restore the obtained/retained employment indicator. CSBG was one of the top job creators under ARRA in 2009-2011 and now we aren't able to report ANY data on customers obtaining jobs.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
312	Aaron Wicks	Action for a Better Community, Inc.	[In response to question "The quality of the information to be collected. "] The quality of the data varies significantly across the network. This report does not ensure quality data are collected because the report treats outcomes in a siloed context rather than the bundled/integrated services that many CAAs provide.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
313	Aaron Wicks	Action for a Better Community, Inc.	[In response to question "The quality of the information to be collected. "] The report does not account for the proportion of outcomes that are not observed. If a CAA provides services in a specific domain for 100 people, it may - for a variety of reasons beyond the agency's control - not observe outcomes for all 100 customers served. The Annual Report provides a low-end estimate of CAA outcomes but provides no mechanism for the CAA to characterize unobserved client outcomes (through staitistical estimation or other means).	Alternative Response	OCS acknowledges this comment and appreciates this feedback. The diverse nature of CAAs presents this issue often when translated into data collection. OCS understands that often the leveraging of resources may not equate to an one to one analysis of each dollar. This coupled with the flexibility of the funding structure, this report tells a portion of the CSBG story.
314	Aaron Wicks	Action for a Better Community, Inc.	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information. "] The agency's time burden estimate is built on a flawed understanding of CAA capacity for reporting. It assumes that there is substantially close to a proportionate reduction in burden per indicator removed/merged. In fact, there is significant fixed costs for CAA reporting. The marginal time burden that is reduced by the proposed changes is much smaller than the agency estimates.	Alternative Response	OCS utilized the burden estimate formula developed for the current annual report and adjusted it based on the reductions and kept in mind there would be initial increases in burden to account for the changes during the periods where there is an overlap of 2.1 and 3.0 reports in FY26 (3.0 is optional in FY26 before becoming mandatory in FY27) but that it would adjust over time. It should be noted that burden estimates are largely estimates and the federal office through an incremental implementation intends to provide expansive technical assistance and
315	Gary Cotton	Racine/Kenosha Community Action Agency, Inc.	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] I think it is necessary, it allows us to share our results as Network	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
316	Gary Cotton	Racine/Kenosha Community Action Agency, Inc.	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] No burden at this time.	No Change or Response Needed	No response required.
317	Gary Cotton	Racine/Kenosha Community Action Agency, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest? "] None at this time	No Change or Response Needed	No response required.
318	Gary Cotton	Racine/Kenosha Community Action Agency, Inc.	[In response to question "The quality of the information to be collected. "] I feel the information being collected is only as good as the individuals doing the collecting.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
319	Gary Cotton	Racine/Kenosha Community Action Agency, Inc.	[In response to question "The clarity of the information to be collected. "] All understandable	No Change or Response Needed	No response required.
320	Barbara Mooney	Association of Nationally Certified ROMA Professionals	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] changes to agency and state level data collection will be costly and represent significant time burden	Alternative Response	OCS acknowledges this comment and shares that during the two-year phased implementation, we will increase our training and technical assistance on these reporting structures and as we currently provide the coding for databases at no-cost, we will continue to so systems can be updated to reflect the collection of information. OCS also emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds
321	Jacqueline Orr	New York State (NYS) Community Action Association, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] I would suggest adding an employment NPI. "The number of individuals who obtained a job."	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
322	Jacqueline Orr	New York State (NYS) Community Action Association, Inc.	[In response to question "The quality of the information to be collected."] In the health and nutrition serices domain, the FNPIs read more like a service: "The number of individuals receiving wellness services." The word "receiving" is also used when describing services. The outcomes should reflect a change that happened after receiving the service, such as. "Individuals who then improved their wellness/overall health. This can also be seen in other domains like FNPI 2a where the NPI references "enrolled" in childcare. The indicator should be the change as a result of receiving childcare.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
323	Sandy Winhofer	Central Susquehanna Opportunities, Inc.	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] Yes it is necessary for proper perfirmance measurement.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
324	Sandy Winhofer	Central Susquehanna Opportunities, Inc.	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] We did not have a chance to read all the material to respond.	No Change or Response Needed	No response required.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
325	Sandy Winhofer	Central Susquehanna Opportunities, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] We did not have a chance to read all the material to respond.	No Change or Response Needed	No response required.
326	Ryan Jackson	Waldo Community Action Partners	[In response to all questions] we will be providing input through witten comment to infocollection@acf.hhs.gov by June 21st, 2024.	No Change or Response Needed	No response required.
327	Julia Bradley	EnAct, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Make sure "getting a job" is made an outcome	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
328	Ben Gulker	State of Michigan Bureau of Community Action and Economic Opportunity	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] Yes.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
329	Ben Gulker	State of Michigan Bureau of Community Action and Economic Opportunity	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] The revisions reduce administrative burden.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
330	Emily Katsimpalis	Larimer County Department of Human Services	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] I believe so	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
331	Emily Katsimpalis	Larimer County Department of Human Services	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Yes	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
332	Emily Katsimpalis	Larimer County Department of Human Services	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Maybe more of a narraritive section to help tell the story	Alternative Response	OCS recommends the use of the Community Level Transformation module to capture qualitiatve information for storytelling of the work at the local level.
333	Emily Katsimpalis	Larimer County Department of Human Services	[In response to question "The quality of the information to be collected."] Looks good	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
334	Emily Katsimpalis	Larimer County Department of Human Services	[In response to question "The clarity of the information to be collected."] Better with the changes	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
335	Emily Katsimpalis	Larimer County Department of Human Services	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."] Accurate - it is a burden/heavy lift	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
336	Trellany White	Orange County Board of County Commissioners	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] Yes, I believe streamlining is necessary to reduce some burden. However, I am concerned with the employment reduction that it does not reflect clearly those who were unemployed and obtained employment. I like the data point that individuals received skills to obtain employment but does not provide a clear indicator of those that did receive employment.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
337	Trellany White	Orange County Board of County Commissioners	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] I think the reduction produces less burden because it limits the measurement source from client or partner. Some of the outcomes however appear to lean more towards and output vs. outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
338	Trellany White	Orange County Board of County Commissioners	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] I think the reduction produces less burden because it limits the measurement source from client or partner. Some of the outcomes however appear to lean more towards and output vs. outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
339	Trellany White	Orange County Board of County Commissioners	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] Making sure the outcomes demonstrate change and not and expanded output measure.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
340	Trellany White	Orange County Board of County Commissioners	[In response to question "The quality of the information to be collected."] Again, the indicators that are based on receiving a service does not necessarily state what was the change that occurred as a result of the service. Suggest direct linking the services to the outcome. This would reduce further burden on burden.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
341	Trellany White	Orange County Board of County Commissioners	[In response to question "The clarity of the information to be collected."] Information is concise.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
342	Trellany White	Orange County Board of County Commissioners	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."] Hope measurement data is just as clear to satisfy the service (output) and outcome (change) in the guidance structure.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
343	Miranda Allan	Greater Lawrence Community Action Council, Inc.	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Absolutely. The percentage of a large community action agency's revenues supported by CSBG funds is often less than 1%. Yet, agencies must staff at least 1 FTE to perform the minimum requirements of CSBG. More realistically, 2 or more FTEs are needed to do the work in a way that is actually helpful to the agency, and not simply performative. So, often a CAA receives a few hundred	Alternative Response	OCS acknowledges this comment and is keenly aware of the burden data collection, analysis, and reporting may have on the CSBG Network. In making suggested edits to Annual Report 3.0, OCS sought to reduce reporting burden to the greatest extent possible. We examined each data point, its utilization, how often it's actually reported, where else it's reported, and how it rolls up nationally, then compared the benefit of collecting each data point to the potential burden of collecting the data at the individual, agency, and grant recipient level. Burden estimates can be
344	Miranda Allan	Greater Lawrence Community Action Council, Inc.	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] The purpose of the activities required of CSBG is often veiled to the agency; additional transparency is needed to show the agency that their output dedicated to CSBG deliverables is actually being utilized in a meaningful way, and has tangible outcomes that positively impact the network's ability to provide high quality services.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
345	Kelsey DeMerlis	Pennsylvania Department of Community and Economic Development	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Yes. Our state utilizes our own database system to collect measures and outcomes. We will need extensive time and additional funds to work with developers to rehab the system.	Alternative Response	OCS acknowledges this comment and shares that during the two-year phased implementation, we will increase our training and technical assistance on these reporting structures and as we currently provide the coding for databases at no-cost, we will continue to so systems can be updated to reflect the collection of information. OCS also emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds
346	James Scott	California Department of Community Services and Development	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] I would encourage using consistent nomenclature throughout the FNPI and SRV subsections. In reviewing the new proposed FNPIs and SRVs I noticed that sometimes the term indiviual is used and sometimes people is used. Either is fine, I would just hope we can land on one term.	Request Change Accepted	OCS has updated the report to ensure consistency switching people to individuals through the report.
347	Mary Randall	PathStone Corporation	[In response to question "Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies."] UnnknownYes	No Change or Response Needed	No response required.
348	Mary Randall	PathStone Corporation	[In response to question "Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?"] Yes, information repetative, and upload documents for various requirements are redundent.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
349	Mary Randall	PathStone Corporation	[In response to question "What, if any, additions, revisions or modifications to the information collection would you suggest?"] updated new programs, that run state/federal or other timelines	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
350	Mary Randall	PathStone Corporation	[In response to question "The quality of the information to be collected."] WAY TOO MUCH - if there were linkes between sheets, this could be streamlined	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
351	Mary Randall	PathStone Corporation	[In response to question "The clarity of the information to be collected."] Most are straight forward, some are grey...	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
352	Mary Randall	PathStone Corporation	[In response to question "The accuracy of the agency's estimate of the burden of the proposed collection of information."] WAY TOO MUCH BURDEN of time	Alternative Response	OCS acknowledges this comment and is keenly aware of the burden data collection, analysis, and reporting may have on the CSBG Network. In making suggested edits to Annual Report 3.0, OCS sought to reduce reporting burden to the greatest extent possible. We examined each data point, its utilization, how often it's actually reported, where else it's reported, and how it rolls up nationally, then compared the benefit of collecting each data point to the potential burden of collecting the data at the individual, agency, and grant recipient level. Burden estimates can be
353	SA Howell LLC	Other: Vendor	Burden of Data CollectionThe efforts to consolidate fields in the new CSBG Annual Report 3.0 are highly commendable. This initiative mirrors successful strategies implemented by SmartQuest Technology, a renowned Community Action software vendor that has spent the past decade simplifying reporting processes. Similar to SmartQuest's advancements, the streamlined structure of the new report aims to reduce the reporting burden on agencies, thereby enhancing the quality of data collected and presenting a more unified and compelling narrative of community action achievements.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
354	SA Howell LLC	Other: Vendor	While we applaud the simplification for its potential to improve data quality and reporting efficiency, we must also express concern about the possible implications of this streamlined approach. Our analysis suggests that while the new format effectively reduces complexity, it may inadvertently underrepresent the full spectrum of initiatives directed at eliminating the causes of poverty. By focusing predominantly on the conditions of poverty through the introduction of "concrete" measures and removing key outcomes, the report risks overshadowing the comprehensive efforts undertaken by community action agencies to address	Alternative Response	OCS acknowledges this comment. Concrete supports have traditionally been in the report but have not had a clear delineation into how they may be counted. Research in human and social services highlights the outcome of providing concrete supports lead to a better quality of life because basic needs are met. At the national level, the goal would be shape the reporting narrative by showing all these concrete supports as a performance measure along with the other indicator to tell the broader story. For example, SRV 1c which provides supplies for employment like work boots

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
355	SA Howell LLC	Other: Vendor	Statutory AlignmentThe original intent of Community Action, as defined by the Economic Opportunity Act (Title II, Part A, Section 201), is to provide stimulation and incentive for both urban and rural communities to mobilize their resources to combat the root causes of poverty. The act specifies that Community Action Agencies should provide services, assistance, and other activities of sufficient scope and size to promise progress toward the elimination of poverty or its causes (Section 202). While Module 2 of the report adequately provides the opportunity for organizations to report leveraged resources, the selected FNPIs may need to	Alternative Response	OCS appreciates this feedback and notes that the remaining indicators align with the national goals as they are largely based on the current data points but written in a manner that aims to produce valid data that can be aggregated for national performance. The added indicators are largely based on the qualitative data submitted by local agencies and states in the 'other' sections of the report, and removed indicators that were underutilized by the network writ large, or utilized for national reporting.
356	SA Howell LLC	Other: Vendor	For example, there is no indicator under FNPI 1 that specifically communicates how many individuals obtain a job or maintain employment as documented in CSBG Statutes.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
357	SA Howell LLC	Other: Vendor	Even more concerning is the lack of ability to communicate the number of individuals who have moved out of poverty or improved self-sufficiency in FNPI 3.	Alternative Response	OCS acknowledges this comment and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS
358	SA Howell LLC	Other: Vendor	Similarly, 42 USC 9908 (b)(1)(A) mandates that CSBG funds be used to remove obstacles to self-sufficiency, secure and retain meaningful employment, attain adequate education, and obtain and maintain adequate housing, among other objectives. Thus, it would be expected that the revised report would include detailed indicators for each of these areas to comply with federal mandates and to illustrate the comprehensive impact of Community Action. It is our opinion that a number of these reporting elements have been removed in the current document.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
359	SA Howell LLC	Other: Vendor	ROMA AlignmentReports from the listening sessions suggest that while analytics were conducted, there is a significant question regarding whether expertise from within the Community Action Network was adequately leveraged to develop a strategy for identifying essential reporting elements that align with programmatic goals. While external perspectives can be valuable, harnessing the deep experience and expertise of those within the Community Action Network, including individuals who were involved in developing the original metrics, is vital for crafting a report that accurately reflects and supports the network's objectives.	Alternative Response	OCS acknowledges this comment and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS
360	SA Howell LLC	Other: Vendor	A critical aspect, highlighted in Module 4 of the Introduction to ROMA curriculum, emphasizes that "National Performance Indicators are a selective sampling of what we do, and reflect only a portion of our work and accomplishments." It underscores the expectation that Community Action Agencies report annually on their full range of outcomes, in addition to the required standard set of national indicators. Importantly, the training module suggests flexibility for agencies to include additional indicators that capture the entirety of their impact, fostering innovation by allowing agencies to demonstrate unique or emerging outcomes.	Alternative Response	OCS acknowledges this comment and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
361	SA Howell LLC	Other: Vendor	It is essential to align the terminology used in the report with the outcomes-focused approach emphasized in Module 3 of the Introduction to ROMA, a fundamental component of the Community Action Network's operational philosophy. The current draft predominantly uses terms that emphasize outputs rather than outcomes, which may not fully convey the effectiveness of the services provided.	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an
362	SA Howell LLC	Other: Vendor	For instance, terms like "enrolled" in FNPI 2a and 2e, "...focus primarily on the activities themselves rather than the actual impact on participants' lives. To truly reflect the transformative effects of Community Action and adhere to well established performance management principles, these indicators should be revised to reflect outcomes such as increased employment rates, improved living conditions, enhanced skill sets, and better access to critical services.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
363	SA Howell LLC	Other: Vendor	For instance, terms like ..."connected" in FNPI 2b, ...focus primarily on the activities themselves rather than the actual impact on participants' lives. To truly reflect the transformative effects of Community Action and adhere to well established performance management principles, these indicators should be revised to reflect outcomes such as increased employment rates, improved living conditions, enhanced skill sets, and better access to critical services.	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an ‘other’ with requirement of description.
364	SA Howell LLC	Other: Vendor	For instance, terms like..."completing training" in FNPI 3a, ...focus primarily on the activities themselves rather than the actual impact on participants' lives. To truly reflect the transformative effects of Community Action and adhere to well established performance management principles, these indicators should be revised to reflect outcomes such as increased employment rates, improved living conditions, enhanced skill sets, and better access to critical services.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
365	SA Howell LLC	Other: Vendor	For instance, terms like..."served" in FNPI 4f, 4g, and 5a...focus primarily on the activities themselves rather than the actual impact on participants' lives. To truly reflect the transformative effects of Community Action and adhere to well established performance management principles, these indicators should be revised to reflect outcomes such as increased employment rates, improved living conditions, enhanced skill sets, and better access to critical services.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
366	SA Howell LLC	Other: Vendor	For instance, terms like ..."receiving services" in FNPI 5c, 5d, 5e, 5f, 5g, 5h, and 5i, focus primarily on the activities themselves rather than the actual impact on participants' lives. To truly reflect the transformative effects of Community Action and adhere to well established performance management principles, these indicators should be revised to reflect outcomes such as increased employment rates, improved living conditions, enhanced skill sets, and better access to critical services.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
367	SA Howell LLC	Other: Vendor	This shift from documenting mere participation to measuring tangible benefits aligns with ROMA's outcome-oriented framework and enhances the report's utility in demonstrating the real value and effectiveness of the Community Action Program to stakeholders, including Congress.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
368	SA Howell LLC	Other: Vendor	To maintain alignment with generally accepted performance management principles, all activities of the network should be correlated with a specific problem. The removal of this problem is an outcome. Some of the new services do not include outcomes, which is contrast to best practices related to performance management.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
369	SA Howell LLC	Other: Vendor	National ReportingOnce the report is finished, we highly recommend development of a nation-wide API. Although some may like the idea of a national system, allowing agencies to use a system that works best for their needs while providing consistent data to OCS, would be a far better option.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
370	SA Howell LLC	Other: Vendor	Module 2 RecommendationsReport Field A.1.The new format introduced in the CSBG Annual Report, which breaks down CSBG allocation expenditures into regular allocation, carryover, discretionary, and discretionary carryover, is a commendable improvement. This categorization is crucial as it addresses a common reporting issue where organizations previously struggled to accurately account for different types of funding. However, we recommend a minor yet significant clarification in terminology: the term "allocation" could be misleading, as it might be interpreted by agencies as referring to the total funds allocated	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
371	SA Howell LLC	Other: Vendor	Section BIn previous versions of the report, data on the certifications of agency staff were collected, which played a significant role in substantiating the capabilities and qualifications of staff involved in executing CSBG-funded programs. The reinstatement of this data collection would not only enhance transparency but also support agencies in defending organizational funds by showcasing the expertise and professionalism of their staff. We suggest maintaining this element in the document to continue highlighting the preparedness and qualifications of personnel within the network.	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an ‘other’ with requirement of description.
372	SA Howell LLC	Other: Vendor	Report Field B.5.While the partner categories have been used for many years, it would be beneficial for the categories to align with those documented in Organizational Standard 2.2. This alignment ensures consistency and coherence in reporting across different standards and enhances the utility of the report in demonstrating how community action agencies collaborate effectively within their ecosystems. Proper categorization according to established organizational standards also aids in benchmarking and evaluating the effectiveness of partnerships.	Alternative Response	OCS appreciates this feedback and while at this current stage,we do not have the capacity for a single entry system. OCS will continue to explore ways in which the data entry and validation process can be updated to leverage technologies to be more efficient.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
373	SA Howell LLC	Other: Vendor	Report Field C.1The previous format allowed agencies to directly report CSBG allocations, which is essential for transparency and effective financial oversight. Many agencies have previously attempted to include these figures in an "other" category, which can lead to inconsistencies and confusion. We recommend adding a dedicated section to report CSBG allocations explicitly, thereby reducing confusion and streamlining financial reporting. This adjustment will clarify the total amount available to each entity and support more accurate financial management and reporting.	Alternative Response	OCS acknowledges this comment. There were no proposed changes to Section C.1 other than removal of reporting year as the reporting year for everyone is no on the federal fiscal year.
374	SA Howell LLC	Other: Vendor	Module 3 RecommendationsModule ReorderingChanging module numbers may improve logical flow at a national level, but could cause significant confusion among network agencies accustomed to the current structure. Adequate training and clear guidance will be essential to mitigate this confusion.	Request Change Not Accepted	OCS appreciates this feedback and after careful review of the comments submitted, this element has been removed from the proposed collection.
375	SA Howell LLC	Other: Vendor	General Service CommentService reporting could be further simplified to goods, services, payments, and referrals for each domain.	Request Change Not Accepted	OCS acknowledges this comment and updated the report to focus on both outputs and outcomes to show changes over time.
376	SA Howell LLC	Other: Vendor	Section SRV 3Include "case management" as a distinct service since it often encompasses comprehensive plans for moving individuals out of poverty, which aligns with the overarching goals of community action.	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
377	SA Howell LLC	Other: Vendor	Service SRV 3dRemove SRV 3d and consolidate all transportation services to avoid duplication and confusion, allowing outcomes to be clearly associated with the service provided.	Request Change Not Accepted	OCS acknowledges and appreciates this feedback. We understand the investments made at the local level to enhance the capacity of staff providing direct services and managing service delivery. The burden to report this information each year was incongruent with the national reporting utility of these data points. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that
378	SA Howell LLC	Other: Vendor	Section SRV 4Simplify by categorizing services into "housing payments (rent/mortgage)," "utility payments," "housing counseling," "housing goods," and "housing services." This modification aims to reduce confusion and improve data clarity.	Request Change Not Accepted	OCS acknowledges this comment and the differentiation between owning and rent is intentional as some community deal with issues such as housing affordability, instability, and availability and the services that lead to owning a home or renting a home are different.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
379	SA Howell LLC	Other: Vendor	Section SRV 5Simplify by removing the distinguishment of how meals are provided (prepared vs delivered) in 5Q and 5R. It is not apparent how this would be beneficial data on the national level.	Alternative Response	OCS acknowledges this comment and notes that Module 2 Section B details the types of organizations that local agencies may partner with according to the Organizational Standards. It should be noted that upon approval by OMB, OCS will continue enhancing its TTA, policy, guidance, and communications to better align with the reporting structure.
380	SA Howell LLC	Other: Vendor	Section SRV 6 Clarify whether SRV 6b includes all board members or only those who are low-income	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the updated collection provides examples of the types of services that fall within a specific indicator.
381	SA Howell LLC	Other: Vendor	Section SRV 6...consider adding "community engagement counseling" to allow reporting on broader engagement activities.	Alternative Response	OCS acknowledges this comment. There were no proposed changes to Section C.1 other than removal of reporting year as the reporting year for everyone is no on the federal fiscal year.
382	SA Howell LLC	Other: Vendor	Section SRV 7If added, ensure there is no duplication of transportation services reported in other sections	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
383	SA Howell LLC	Other: Vendor	Section SRV 7...and simplify to "transportation payments" to cover all types of transportation aids.	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
384	SA Howell LLC	Other: Vendor	General FNPI Comment Remove separate outcome line items in the report and, instead, introduce a short section that captures targeted demographic data for each domain. This will reduce the planning burden, improve data accuracy, and allow for improved national analytics.	Request Change Not Accepted	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
385	SA Howell LLC	Other: Vendor	General FNPI Comment Consider the following list of outcomes developed by SmartQuest Technology. They have been effective in storytelling for their customers for the past seven years and are mapped to the current CSBG Annual Report (some in the “other” category) and Head Start PIR:•Unemployed individuals obtain a job.•Adults obtained skills and qualifications.•Children are ready for school.•Children and youth meet academic standards.•Parents increase engagement with educators (Head Start)•Parents increase engagement with children (Head Start)•Individuals obtain a Living Wage Equivalent income.•Households met a temporary need.•Homeless individuals obtain housing.•Individuals avoid eviction/foreclosure.•Individuals experienced improved	Alternative Response	OCS appreciates this and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances, there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective
386	SA Howell LLC	Other: Vendor	General FNPI Comment Add an “Other” outcome section for each domain to foster innovation and identify new reporting trends in the network.	Request Change Not Accepted	OCS acknowledges this comment and updated the report to focus on both outputs and outcomes to show changes over time.
387	SA Howell LLC	Other: Vendor	Section FNPI 1Add outcomes that specifically measure the securing and maintaining employment for those who are unemployed as specified in the CSBG Statutes.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
388	SA Howell LLC	Other: Vendor	Outcomes FNPI 1a and 1b are not necessary, and duplicative of FNPI 2d, which is where they should be counted.	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
389	SA Howell LLC	Other: Vendor	Outcome FNPI 2aEnrollment in a program is not an outcome. It should be removed. The outcome measuring success of an early childhood program is “improved school readiness.”	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
390	SA Howell LLC	Other: Vendor	Outcome FNPI 2bConnection to a program is not an outcome. It should be removed. The outcome for measuring success of a program of this type is “improved skills” or “achieving at academic standards.”	Request Change Not Accepted	OCS acknowledges this comment and included transportation as it is a commonly reported metric across grant recipients in the other category and research has shown that it is a key factor for economic mobility. OCS emphasizes the unit of measurement for transportation is not the individual but the transportation unit which should be easier to capture from inventory of units such as vouchers procured or number of riders.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
391	SA Howell LLC	Other: Vendor	Outcome FNPI 2eEnrollment in a program is not an outcome. It should be removed. The outcome for a post-secondary education program can be captured in FNPI 2f.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
392	SA Howell LLC	Other: Vendor	Outcome FNPI 3aCompleting training is not an outcome. It should be removed. The outcome would be “improved financial well-being” or “maintaining a budget for 90 days.” These should be added back. Although numbers may be lower, these are key outcomes for the network.	Request Change Not Accepted	OCS acknowledges this comment and the differentiation between owning and rent is intentional as some community deal with issues such as housing affordability, instability, and availability and the services that lead to owning a home or renting a home are different.
393	SA Howell LLC	Other: Vendor	Outcome FNPI 3cIt is questionable that the purchase of a home actually improves the ability of a person to escape poverty. Further, this is a housing outcome.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
394	SA Howell LLC	Other: Vendor	Outcome FNPI 4fBeing served by a program is not an outcome. The appropriate outcomes would be “avoided utility disconnection” and “established utilities.”	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
395	SA Howell LLC	Other: Vendor	Outcome FNPI 4gBeing served by a program is not an outcome. The appropriate outcomes would be “improved water safety” or “improved water quality.”	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
396	SA Howell LLC	Other: Vendor	Outcome FNPI 5aThe verbiage “preventative measures” is not an outcome. This verbiage should be removed.	Alternative Response	OCS acknowledges this comment and appreciates this feedback. Upon approval by OMB, OCS will release additional guidance as supplemental training materials to specify where possible what counts.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
397	SA Howell LLC	Other: Vendor	Outcome FNPI 5cReceiving services is not an outcome. What is the problem that is being resolved?	Alternative Response	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
398	SA Howell LLC	Other: Vendor	Outcome FNPI 5dReceiving services is not an outcome. The results of a service of this type can be communicated in FNPI 5a.	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an 'other' with requirement of description.
399	SA Howell LLC	Other: Vendor	Outcome FNPI 5eReceiving services is not an outcome. The appropriate outcome is "maintaining independence."	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
400	SA Howell LLC	Other: Vendor	Outcome FNPI 5gReceiving services is not an outcome. The appropriate outcome is "improved oral health."	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
401	SA Howell LLC	Other: Vendor	Outcome FNPI 5hReceiving services is not an outcome. The appropriate outcome is "improved oral health."	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
402	SA Howell LLC	Other: Vendor	Outcome FNPI 5iReceiving access to food is not an outcome. The appropriate outcome is "improved food security."	Alternative Response	OCS acknowledges this comment and included transportation as it is a commonly reported metric across grant recipients in the other category and research has shown that it is a key factor for economic mobility. OCS emphasizes the unit of measurement for transportation is not the individual but the transportation unit which should be easier to capture from inventory of units such as vouchers procured or number of riders.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
403	SA Howell LLC	Other: Vendor	DemographicsIs “retired” not included in “Not in labor force?”	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service
404	SA Howell LLC	Other: Vendor	DemographicsIs it necessary to differentiate between “Two adults, no children” and “Multiple adults, no children” for the purposes of national reporting?	Request Change Not Accepted	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency
405	SA Howell LLC	Other: Vendor	DemographicsRemoval of income types may not be in the best interest of the network. We recommend reconsideration.	Request Change Accepted	OCS acknowledges this comment and has restored Module 4 Section parts 13 and 14 for household income sources.
406	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Thank you for the opportunity to provide feedback. We have collaborated with a number of our customers and partners and have some concerns with the current version of the report. It is our hope that you will consider our 30+ years of analytical experience with the Community Action Network in your revisions.	Alternative Response	OCS appreciates this and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances, there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS
407	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Module 2 RecommendationsReport Field A.1.The new format introduced in the CSBG Annual Report, which breaks down CSBG allocation expenditures into regular allocation, carryover, discretionary, and discretionary carryover, is a commendable improvement. This categorization is crucial as it addresses a common reporting issue where organizations previously struggled to accurately account for different types of funding.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
408	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Section BIn previous versions of the report, data on the certifications of agency staff were collected, which played a significant role in substantiating the capabilities and qualifications of staff involved in executing CSBG-funded programs. The reinstatement of this data collection would not only enhance transparency but also support agencies in defending organizational funds by showcasing the expertise and professionalism of their staff. We suggest maintaining this element in the document to continue highlighting the preparedness and qualifications of personnel within the network.	Request Change Not Accepted	OCS acknowledges this comment and notes this element was removed for both the utilization in national reporting and the burden on local agencies. OCS recognizes this may be an element, local agencies opt to report to their local boards or management and OCS understands that some data removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency (subrecipient), state, tribe, or territory (grant

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
409	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Report Field B.5.While the partner categories have been used for many years, it would be beneficial for the categories to align with those documented in Organizational Standard 2.2. This alignment ensures consistency and coherence in reporting across different standards and enhances the utility of the report in demonstrating how community action agencies collaborate effectively within their ecosystems. Proper categorization according to established organizational standards also aids in benchmarking and evaluating the effectiveness of partnerships.	Alternative Response	OCS acknowledges this comment and notes this element saw no revisions from the current version and aligns with the organizational standards referenced with all the types of recommended partnership organization listed.
410	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Report Field C.1The previous format allowed agencies to directly report CSBG allocations, which is essential for transparency and effective financial oversight. Many agencies have previously attempted to include these figures in an "other" category, which can lead to inconsistencies and confusion. We recommend adding a dedicated section to report CSBG allocations explicitly, thereby reducing confusion and streamlining financial reporting. This adjustment will clarify the total amount available to each entity and support more accurate financial management and reporting.	Alternative Response	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
411	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Module 3 Recommendations Module Reordering Changing module numbers may improve logical flow at a national level but could cause significant confusion among network agencies accustomed to the current structure.	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
412	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Module 3 Recommendations Module Reordering While our system allows for flexibility in this matter, it could present financial complexities for agencies using other ssoftware vendors.	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
413	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	General Service CommentSeven years ago we simplified our service list to goods, services, payments, and referrals for each domain. These are mapped to specific items in the current CSBG Annual Report, and have proven effective in storytelling for our customers.	Alternative Response	OCS acknowledges this comment and appreciates the feedback
414	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Section SRV 3Include "case management" as a distinct service in the income section. Many organizations will consider the lack of reporting as an indication that this metric is not encouraged as an activity of the network.	Alternative Response	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
415	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Service SRV 3dAll transportation outcome should be in the same place.	Request Change Accepted	OCS has updated this to correctly place transportation services in SRV 7.
416	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Section SRV 4Simplify by categorizing services into "housing payments (rent/mortgage)," "utility payments," "housing counseling," "housing goods," and "housing services."	Request Change Not Accepted	OCS acknowledges this comment and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS
417	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Section SRV 5Simplify by removing the distinguishment of how meals are provided (prepared vs delivered) in 5Q and 5R.	Request Change Not Accepted	OCS acknowledges this comment and will not combine the elements as there are local agencies who operate food banks, pantries, and such and there are others in rural areas or urban areas who rely on home delivery models for those who are home bound.
418	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Section SRV 6Consider adding "community engagement counseling" to allow reporting on broader engagement activities.	Request Change Not Accepted	OCS acknowledges this comment and notes the term is broad and could create issues with data validity as it can mean different things. Suggest using the 'Other' category.
419	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Section SRV 7If added, ensure there is no duplication of transportation services reported in other sections	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
420	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Section SRV 7...and simplify to "transportation payments" to cover all types of transportation aids.	Alternative Response	OCS appreciates the feedback. The transportation domain uses the actual transportation service as the unit of measurement. This has been revised to be more clear. For example, it's the number of gas cards, vouchers, rides, etc. as opposed to the number of people served with transportation services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
421	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	General FNPI Comment Remove separate outcome line items in the report and, instead, introduce a short section that captures targeted demographic data for each domain. This will reduce the planning burden, improve data accuracy, and allow for improved national analytics.	Request Change Not Accepted	OCS acknowledges this comment and appreciates the feedback.
422	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	General FNPI Comment Seven years ago we developed an abbreviated list of outcomes that are used for the CSBG Annual Report and Head Start PFCE efforts. They have been effective in storytelling our customers, and are mapped to appropriate fields in both reports. •Unemployed individuals obtain a job.•Adults obtained skills and qualifications.•Children are ready for school.•Children and youth meet academic standards.•Parents increase engagement with educators (Head Start)•Parents increase engagement with children (Head Start)•Individuals obtain a Living Wage Equivalent income.•Households met a temporary	Alternative Response	OCS acknowledges this comment and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS
423	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	General FNPI Comment Add an “Other” outcome section for each domain to foster innovation and identify new reporting trends in the network.	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an ‘other’ with requirement of description.
424	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Section FNPI 1Add outcomes that specifically measure the securing and maintaining employment for those who are unemployed as specified in the CSBG Statutes.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
425	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Outcomes FNPI 1a and 1b are not necessary, and duplicative of FNPI 2d, which is where they should be counted.	Request Change Not Accepted	OCS acknowledges this comment and appreciates the feedback.
426	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Outcome FNPI 2aEnrollment in a program is not an outcome. It should be removed. The outcome measuring success of an early childhood program is “improved school readiness.”	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
427	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Outcome FNPI 2bConnection to a program is not an outcome. It should be removed. The outcome for measuring success of a program of this type is “improved skills” or “achieving at academic standards.”	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services
428	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Outcome FNPI 2eEnrollment in a program is not an outcome. It should be removed. The outcome for a post-secondary education program can be captured in FNPI 2f.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services
429	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Outcome FNPI 3aCompleting training is not an outcome. It should be removed. The outcome would be “improved financial well-being” or “maintaining a budget for 90 days.” These should be added back. Although numbers may be lower, these are key outcomes for the network.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services
430	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Outcome FNPI 3cIt is questionable that the purchase of a home actually improves the ability of a person to escape poverty. Further, this is a housing outcome.	Request Change Accepted	OCS acknowledges this comment and revised this indicator to captured the obtainment of an asset to meet the goal of self-sufficiency.
431	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Outcome FNPI 4fBeing served by a program is not an outcome. The appropriate outcomes would be “avoided utility disconnection” and “established utilities.”	Alternative Response	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
432	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Outcome FNPI 4gBeing served by a program is not an outcome. The appropriate outcomes would be “improved water safety” or “improved water quality.”	Alternative Response	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
433	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Outcome FNPI 5aThe verbiage “preventative measures” is not an outcome. This verbiage should be removed.	Request Change Not Accepted	OCS acknowledges this comment and has included directional language but the term preventative measures was added to be inclusive of the services and an industry standard.
434	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Outcome FNPI 5cReceiving services is not an outcome. What is the problem that is being resolved?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services..
435	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Outcome FNPI 5dReceiving services is not an outcome. The results of a service of this type can be communicated in FNPI 5a.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services..
436	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Outcome FNPI 5eReceiving services is not an outcome. The appropriate outcome is “maintaining independence.”	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services..
437	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Outcome FNPI 5gReceiving services is not an outcome. The appropriate outcome is “improved oral health.”	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services..
438	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Outcome FNPI 5hReceiving services is not an outcome. The appropriate outcome is “improved oral health.”	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services..

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
439	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	Outcome FNPI 5iReceiving access to food is not an outcome. The appropriate outcome is “improved food security.”	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an ‘other’ with requirement of description.
440	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	DemographicsIs “retired” not included in “Not in labor force?”	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report.
441	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	DemographicsIs it necessary to differentiate between “Two adults, no children” and “Multiple adults, no children” for the purposes of national reporting?	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
442	Walter Fordham on behalf of SmartQuest Technology LLC	Other: Vendor	DemographicsRemoval of income types may not be in the best interest of the network. We recommend reconsideration.	Alternative Response	OCS acknowledges this comment. The income source types were eliminated to reduce the burden on individuals with low income seeking services, for consideration for how this information is actually used and how often, the validity, and for the utility in what it may or may not provide when addressing the national goals of CSBG.
443	Abigail Hanks	Virginia Department of Social Services	A few questions have come up from our network and our office in regards to the proposed annual report. 1. For states who are currently on the state fiscal year and would need to shift to federal fiscal year (ours included) how are we to handle that extra quarter to make that shift? Would we report on 5 quarters one year or would we submit one quarter report to make the shift?	Alternative Response	FNPI 1a and 1b seeks to measure the increase of skills that led to employment. This outcome is tied to skills building while 1d and 1e are specific to pure employment obtainment.
444	Abigail Hanks	Virginia Department of Social Services	2. Many of the FNPI’s list are now more output language instead of an outcome? Is it proposed to change the language to outputs vs. outcomes?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
445	Abigail Hanks	Virginia Department of Social Services	3. For our public CAPs that have sub-grantees, they would need to change their program year as well and need to make changes to their RFP processes and timelines. I believe the 2nd comment period is due to start June 28, 2024, then clearance would occur winter 2024. Would the final version be released prior to winter 2024 so we can begin to make changes and allow our publics to make changes for their sub-grantees in time?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
446	Abigail Hanks	Virginia Department of Social Services	4. In the service to outcome plan – is the intention that if a service is connected to an 'outcome' (which is in most cases more of an output) that they would have to report on that outcome? And if it is concrete support they would only report on the service or can they just report on a service even if it is connected to an outcome according to attachment b?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
447	Eva Rohlman	Mid Michigan Community Action Agency Inc	On Pg 29, the new SRV 5t references the number of hygiene kits. To align with other Services, I would recommend that the language be: The number of individuals receiving hygiene kits and supplies (e.g., hygiene kits, toothpaste, soap, deodorant, menstrual products).	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
448	Eva Rohlman	Mid Michigan Community Action Agency Inc	On Pg 29, the new SRV 5u references the number of diapers. To align with other Services, I would recommend that the language be: The number of individuals receiving diapers/diapering supplies (e.g.: diapers, wipes).	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
449	Christina Zamora	Klamath Lake Community Action Services	I've reviewed the proposed changes/updates to the CSBG Annual Report and have the following comments: • All Characteristics section reformat is easier to understand than the current version; it's really clear what data is at the individual level and what data is at the household level.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
450	Christina Zamora	Klamath Lake Community Action Services	• Many of the changes appear to be housekeeping by removing outdated funding references or underutilized metrics.	Alternative Response	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
451	Christina Zamora	Klamath Lake Community Action Services	• FNPI 4f. The number of individuals served with energy assistance or energy efficiency homes. What does this mean?	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report.
452	Christina Zamora	Klamath Lake Community Action Services	• The removal of non-cash benefits seems odd as we've reported on this annually.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain).
453	David Hagen	Hawkeye Area Community Action Program, Inc.	Hi, you will need to add Transportation to the CA network national theory of change illustration.	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback.
454	David Hagen	Hawkeye Area Community Action Program, Inc.	2. FYI, posting these the end of May reduces the response time to a month. [In reference to posting the recorded listening session at the end of May]	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
455	Phillip Good II	Lycoming-Clinton Counties Commission for Community Action	Could you clarify the Timeline for implementation, the slide shown does not appear to align with ACF-OCS-CSBG-DCL-24-09	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical
456	Alexis Cruz	Community Action Partnership of Lancaster and Saunders Counties, Inc.	[Regarding the https://www.childwelfare.gov/topics/well-being/ link]I don't see how the link provided talks about Concrete Supports?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
457	Jaimi Clifford	Maine Department of Health and Human Services	will all of the comments be shared?	Alternative Response	OCS acknowledges this comment and yes comments will be shared.
458	Sarah Priest	Minnesota Office of Economic opportunity	[In response to verbal comment shared by Jenny Larson of Minnesota Three Rivers Community Action: Many of us have software systems for tracking all the reporting based on the old requirements, so time and expense needed to update the questions needed to report out on them. So I respectfully ask for time and perhaps resources so we can update our information systems. My other comment is if you are going to use services to outcome model, really hard for us if multiple services lead to one outcome, worry about duplicated number of people served. Can't simply add services together because potentially some duplicated	Alternative Response	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
459	David Hagen	Hawkeye Area Community Action Program, Inc.	I applaud OCS's interest in the reduction of burden related data collection. It is always good to review process and find ways to make it better.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
460	David Hagen	Hawkeye Area Community Action Program, Inc.	Let's put the CSBG Annual Report and the current NPIs in their historical context.After GPRA of 1993 was signed into law by President Clinton, the Community Action Network developed ROMA and the first version of the family NPIs. Then it had 6 national goals: two for family-level needs, two for agency-level needs, andtwo for community-level needs. GPRA was about the need for planning processes, the capacity to track outputs (the service counts) and outcomes (the NPIs), and responsive customer service that could measure customer satisfaction for any organization or branch of government that received federal dollars.After	Alternative Response	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
461	David Hagen	Hawkeye Area Community Action Program, Inc.	Furthermore, B.4 and B.5 are virtually meaningless without agency capacity information. Consider CAA #1 with 10 employees and the following certifications: 1 ROMA trainer, 2 CCAPS, and 0 LEED Risk Assessors, and CAA #2 with 300 employees and the following certifications: 2 ROMA trainers, 4 CCAPS, and 1 LEED Risk assessor. Which CAA has better capacity? Without contextualization of agency size and service portfolio, the counts tracked in Module 2, Section B cannot tell a significant story nor can they measure which agency should be more effective.Furthermore, since this kind of agency-level data does not inform and	Alternative Response	OCS acknowledges and appreciates this comment and highlights that for the national reporting, this information is aggregated across nearly 1,000 agencies to demonstrate how capacity and resources are leveraged. Nationally, the volunteer hours are calculated to show how each dollar is maximized. OCS recognizes the diversity in local agencies. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and
462	David Hagen	Hawkeye Area Community Action Program, Inc.	Where volunteer hours can be converted to in kind amounts per IRS metrics, it may be worth keeping B.3 with its potential to capture the leveraging of in-kind values, but otherwise Module 2, Section B is unnecessary data collection. Eliminating it, will eliminate data burden.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
463	David Hagen	Hawkeye Area Community Action Program, Inc.	Module 2, Section A could also be eliminated unless it is linked the associated NPIs and service counts by CSBG expenditure domain. GPRA and the GPRA Modernization of 2010 ask us to measure meaningful impact; the latter also mentioned the importance of trending it over time. Module 2, Section A should be collected, but only if, the expenditure data can be associated with the report SRVs and NPIs later in the report.	Alternative Response	OCS acknowledges this comment and notes the expenditures allows for an accounting of the use of federal dollars.
464	David Hagen	Hawkeye Area Community Action Program, Inc.	Summary: OCS's Community Action Goals presented in the National Theory of Change provide the framework for regular, trend able reporting of the work of CSBG dollars. With the GPRA Modernization Act the agency-level goals were eliminated. Reporting on agency capacity has no significance (and represents a data burden). This is an unnecessary section of the CSBG annual report unless the reported data is linked with the performance measures (i.e., the NPIs/outcomes and SRV counts/outputs).	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
465	David Hagen	Hawkeye Area Community Action Program, Inc.	I believe the estimated hours for the completion of the CSBG annual report and the estimated reduction are inflated. More importantly, they do not truly address the causes of data burdens many non-profit CSBG eligible entities experience on a daily basis.	Alternative Response	OCS utilized the burden estimate formula developed for the current annual report and adjusted it based on the reductions and kept in mind there would be initial increases in burden to account for the changes during the periods where there is an overlap of 2.1 and 3.0 reports in FY26 (3.0 is optional in FY26 before becoming mandatory in FY27) but that it would adjust over time. It should be noted that burden estimates are largely estimates and the federal office through an incremental implementation intends to provide expansive technical assistance and
466	David Hagen	Hawkeye Area Community Action Program, Inc.	Module 2, Section C captures the mix of potential fund sources that any CAA may uses. The data burden is not the CSBG Annual Report really, but the number of mandatory (and often technological outdated) software systems used by the different fund sources and employed by CAAs. The for-profit world, especially the corporate organizations, have technological infrastructure that allows different software systems to communicate bidirectional in a secure and confidential manner. Until HHS, USDA, HUD, DOE, and DOL approved systems have the capacity to share data (like using REST APIs) and such connectivity is mandated by	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
467	David Hagen	Hawkeye Area Community Action Program, Inc.	The suggested changes are not going to reduce the burden as they do not address the root causes.	Alternative Response	OCS utilized the burden estimate formula developed for the current annual report and adjusted it based on the reductions and kept in mind there would be initial increases in burden to account for the changes during the periods where there is an overlap of 2.1 and 3.0 reports in FY26 (3.0 is optional in FY26 before becoming mandatory in FY27) but that it would adjust over time. It should be noted that burden estimates are largely estimates and the federal office through an incremental implementation intends to provide expansive technical assistance and
468	David Hagen	Hawkeye Area Community Action Program, Inc.	In Iowa, we just completed the submission of agency CSBG Applications for FFY2025. Since we use the ROMA Cycle, the current fNPIs and cNPIs are included in the plan. That means the suggested timeline for the introduction of 2.1 and 3.0 do not fit our operations. Their implementation will already be a burden. Scrap 2.1 and implement 3.0 for FFY 2026.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
469	David Hagen	Hawkeye Area Community Action Program, Inc.	OCS did not reach out to the network like it did after the passing of the GPRA Modernization Act of 2010. The review of the CSBG Report was a good idea, but the road to hell is paved with good ideas. It is unfortunate that the current OCS team (or perhaps, it was their paid consultant) did not engage the National Community Action Network in a positive, collaborative review process as OCS did after the GPRA Modernization Act was signed into law.	Alternative Response	Over the last few years, OCS has conducted numerous site visits with state administrators, state associations, and local agencies. In discussions during these visits, we heard firsthand from individuals how cumbersome it is to collect the information in Annual Report 2.1. Moreover, during informal engagements with states at national conferences, monthly engagements and quarterly calls with grant recipients, and ongoing technical assistance discussions, we have heard directly from our grant recipients the challenges faced with collecting this data. In addition to
470	David Hagen	Hawkeye Area Community Action Program, Inc.	Summary: Scrap version 2.1, implement version 3.0 (or its amended future form) for FFY2026 or FFY2027, and allow all CSBG eligible entities time to adjust to shifting their reporting for CSBG to the federal fiscal year. The move away from the DUNS number did not require any of these changes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
471	COMMUNITY ACTION RESOURCE AND DEVELOPMENT, INC.	COMMUNITY ACTION RESOURCE AND DEVELOPMENT, INC.	Community Action was supposed to be about family and community CHANGE SUBSTANTIAL CHANGE, LIFE/COMMUNITY CHANGING CHANGE, NOT about providing emergency and temporary services and outputs. CAAs should be about community involvement and leadership, being a community catalyst and advocate (where the advocacy and education are needed), and not measuring temporary OUTPUTS! The Report change largely takes us backwards regarding outputs...we simply become another service provider.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
472	COMMUNITY ACTION RESOURCE AND DEVELOPMENT, INC.	COMMUNITY ACTION RESOURCE AND DEVELOPMENT, INC.	The real impact comes of CAA comes from community involvement: sitting and being heard at the decision tables, be recognized as community/county/state LEADERS, recognized as problem solvers, being capable of leveraging resources and finding solutions (which may be had without$$$), demonstrate high integrity and transparency, being individual/family/business/community mentors, developing and growing networks/collaborations/partnerships! If direct services are provided, either directly or indirectly, then they should only do so if the service embraces and funds intensive case management (which no one wants to fund). If	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
473	Lisa Mowry	Change, Incorporated	The quality of the information to be collected. - Our agency receives funding from a variety of sources, each of which requires the utilization of a separate database. This creates a tremendous hardship in preparing an unduplicated count of customers served, and compiling a characteristic report, as each funder requires different information to be collected.	Alternative Response	OCS acknowledges this comment and appreciates the feedback, the state systems are outside of our purview but OCS has invested in the CSBG Performance Management Website which provides a dynamic display of data submitted to the federal office.
474	Lisa Mowry	Change, Incorporated	The clarity of the information to be collected. - At times, the NPIs and SRVs are subjective to the agency collecting the information, so I may use one SRV and/or NPI for the program, while another agency may report using a different SRV and/or NPI. This can dilute the impact of the outcomes.	Alternative Response	OCS acknowledges this comment and denotes this as there are areas where there multigenerational households without children or areas where there are issues with housing affordability, therefore there may be adults living together.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
475	Lisa Mowry	Change, Incorporated	Does the information to be collected produce a significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology? - Our state has tried to reduce the burden by utilizing a statewide system. However, it does create a need to dual enter data in the funders system and then the state's system. In addition, due to confidentiality and HIPAA requirements, funders forbid the dual entry, so we are unable to obtain an unduplicated agency number.	Alternative Response	OCS acknowledges this comment and appreciates the concerns regarding state systems. While OCS cannot change the systems used by states or other federal programs, we are committed to reducing burden to CSBG reporting in any way we can.
476	Lisa Mowry	Change, Incorporated	Does the information to be collected produce a significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology? - As for the changes in the Annual Report, some of our programs SRV/NPI have increased (such as health related programs).	Request Change Accepted	OCS acknowledges this comment and has restored Module 4 Section parts 13 and 14 for household income sources.
477	Lisa Mowry	Change, Incorporated	No Service/Outcome Now - FNPI 5e – The number of parents/caregivers who demonstrated increased sensitivity and responsiveness in their interactions with their children. We used this for a Monitored Access & Visitation Program.	Alternative Response	OCS acknowledges this comment and notes the removal of the federal requirement from OCS does not preclude local agencies from collecting it for other funding sources or there own reporting requirements.
478	Lisa Mowry	Change, Incorporated	No Service/Outcome Now - SRV 5w Crisis Calls was used for Domestic Violence and Child Advocacy. There is no service or NPI for Child Advocacy now that I can find.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
479	Lisa Mowry	Change, Incorporated	No Service/Outcome Now - SRV 3o was used for Volunteer Income Tax Assistance. There is no service or NPI for VITA now.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
480	Lisa Mowry	Change, Incorporated	Service / Outcome Connection Issue - SRV 2n lists financial literacy as an example, but the NPI is for education or vocation.	Alternative Response	OCS acknowledges this comment appreciates this feedback. The service to outcome connection will be updated as a result of the marked changes due to the comment period.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
481	Lisa Mowry	Change, Incorporated	Service / Outcome Connection Issue - SRV 4b is “received housing payment assistance” which we used for First Time Home Buyers Program down payments. The NPI connected is 4d for avoiding foreclosure. Can we connect it to obtain housing instead?	Alternative Response	OCS acknowledges this comment and has updated the FNPI but obtaining a new home is now captured in income and asset building.
482	Lisa Mowry	Change, Incorporated	Service / Outcome Connection Issue - SRV 5g says maternal child health, but the NPI is reproductive services. Is this just for maternal health?	Request Change Not Accepted	OCS acknowledges this comment and notes this element was removed for both the utilization in national reporting and the burden on local agencies. OCS recognizes this may be an element, local agencies opt to report to their local boards or management and OCS understands that some data removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency (subrecipient), state, tribe, or territory (grant
483	Lisa Mowry	Change, Incorporated	Service / Outcome Connection Issue - FNPI 5d is a service not an indicator. Do we place medical services here now? The examples don’t lead you to primary care services.	Alternative Response	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e. increase, decrease). As noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report.
484	Lisa Mowry	Change, Incorporated	Service / Outcome Connection Issue - FNPI 5e is a service, and the same language as SRV 5i	Alternative Response	OCS acknowledges this comment and notes this element saw no revisions from the current version and aligns with the organizational standards referenced with all the types of recommended partnership organization listed.
485	Lisa Mowry	Change, Incorporated	Service / Outcome Connection Issue - SRV 5m for domestic violence is linked to behavioral health improvement. It used to link to emergency services, and protection from violence. Domestic Violence is not just a behavioral health issue.	Request Change Not Accepted	OCS acknowledges and appreciates this feedback. Domestic Violece support in the current Annual Report is listed under the same domain and subcategory (see SRV 5x in AR 2.1). Similarly in the current report there are no FNPIs that connect to this service. While the proposed changes keep it in the same domain, these changes now connect it to a potential outcome.
486	Lisa Mowry	Change, Incorporated	Service / Outcome Connection Issue - FNPI 5g and 5h are the same as services SRV 5n and 5o.	Alternative Response	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain).

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
487	Roger Pavey	Illinois Association of Community Action Agencies	The Illinois Association of Community Action Agencies (IACAA) appreciates the opportunity to submit comments on ACF-OCS-CSBG-DCL-24-09 Annual Report 3.0 Revisions.IACAA supports many of the proposed changes:1. Timeline for Implementation (Dear Colleague Memorandum page 4/8): IACAA supports the flexibility to states and subgrantees regarding the timeline to implement the new 3.0 report. Adjustments to processes, software, and training will require time, and OCS has recognized the need for flexibility between now and FY2026.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
488	Roger Pavey	Illinois Association of Community Action Agencies	IACAA supports many of the proposed changes:2. Concrete Supports (Dear Colleague Memorandum page 1/8, Module 3 Section A, and Attachment B): IACAA supports the inclusion of Concrete Supports that do not require a cascading performance indicator. This reliance on established research and "proxy outcomes" simplifies the reporting process and should increase consistency and fidelity in aggregated data.	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
489	Roger Pavey	Illinois Association of Community Action Agencies	IACAA supports many of the proposed changes:3. Promised Alignment of Demographics to Census Categories (Module 3, Section B): IACAA supports OCS's stated intent to align demographic categories on the Client Characteristics to the U.S. Census categories to promote respect and improve data usage and disaggregation for analysis.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
490	Roger Pavey	Illinois Association of Community Action Agencies	IACAA supports many of the proposed changes: 4. Reduced Reporting Burden (Dear Colleague Memorandum page 1/8): Thank you for working to reduce the reporting burden on grant recipients and subrecipients.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
491	Roger Pavey	Illinois Association of Community Action Agencies	IACAA supports many of the proposed changes:5. Module 2 CSBG Expenditure Reporting (Module 2 Section A): Breaking down CSBG allocation expenditures into regular allocation, carryover, discretionary, and discretionary carryover is a commendable improvement. This categorization is crucial as it addresses a common reporting issue where organizations previously struggled to account accurately for different types of funding. However, the term "allocation" could be misleading, as subgrantees might interpret it as referring to the total funds allocated (awarded) rather than the amount expended.	Request Change Not Accepted	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources to address system changes for a routine process such as updated information collection under the Paperwork
492	Roger Pavey	Illinois Association of Community Action Agencies	IACAA has concerns about some of the proposed changes:1. Employment Outcomes (Report 2.1 Module 3 Section B): Please restore the employment indicators (CNPI 1a, 1b, 1c, 1d, and 1e (or some combination of adult employment outcomes) from Report 2.1. Tracking and reporting employment gained and retention of employment over time are crucial to addressing the root causes of poverty. In recent years, CSBG has nationally reported creating nearly 35,000 jobs.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
493	Roger Pavey	Illinois Association of Community Action Agencies	IACAA has concerns about some of the proposed changes: 2. Case Management (Module 3, SRV3): Please include "case management" as a direct service with cascading outcomes in employment, housing, education, and other areas. Case management is the key to comprehensive and enduring family change as part of a whole-family approach (WFA). The CSBG Act directs Community Action Agencies to address the root causes of poverty. Case management is one of our best tools to accomplish this requirement because it is customer-centered and focuses on what individual families need.	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
494	Roger Pavey	Illinois Association of Community Action Agencies	IACAA has concerns about some of the proposed changes:3. Outcome Language (Module 3): In several instances, NPIs proposed in Report 3.0 are stated as outputs (services), not outcomes. We encourage OCS to reword all NPIs using outcome language to reflect family-level change. Changing the NPIs back to outcome language reinforces the principles of ROMA and better captures the purpose of CSBG. Examples of NPIs stated as outputs instead of outcomes include FNPIs 2a, 2b, 2e, 3a, 4f, 4g, 5a, 5c, 5d, 5e, 5g, 5h, and 5i.	No Change or Response Needed	No response required.
495	Cathy Feltner	Embarras River Basin Agency	The Embarras River Basin Agency, Inc. (ERBA) appreciates the opportunity to submit comments on ACF-OCSCSBG- DCL-24-09 Annual Report 3.0 Revisions.ERBA supports many of the proposed changes:1. Timeline for Implementation (Dear Colleague Memorandum page 4/8): ERBA supports the flexibility to states and subgrantees regarding the timeline to implement the new 3.0 report. Adjustments to processes, software, and training will require time, and OCS has recognized the need for flexibility between now and FY2026.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
496	Cathy Feltner	Embarras River Basin Agency	ERBA supports many of the proposed changes:2. Concrete Supports (Dear Colleague Memorandum page 1/8, Module 3 Section A, and Attachment B): ERBA supports the inclusion of Concrete Supports that do not require a cascading performance indicator. This reliance on established research and "proxy outcomes" simplifies the reporting process and should increase consistency and fidelity in aggregated data.	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
497	Cathy Feltner	Embarras River Basin Agency	ERBA supports many of the proposed changes:3. Promised Alignment of Demographics to Census Categories (Module 3, Section B): ERBA supports OCS's stated intent to align demographic categories on the Client Characteristics to the U.S. Census categories to promote respect and improve data usage and disaggregation for analysis.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
498	Cathy Feltner	Embarras River Basin Agency	ERBA supports many of the proposed changes: 4. Reduced Reporting Burden (Dear Colleague Memorandum page 1/8): Thank you for working to reduce the reporting burden on grant recipients and subrecipients.	Request Change Accepted	OCS has updated this to correctly place transportation services in SRV 7.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
499	Cathy Feltner	Embarras River Basin Agency	ERBA supports many of the proposed changes:5. Module 2 CSBG Expenditure Reporting (Module 2 Section A): Breaking down CSBG allocation expenditures into regular allocation, carryover, discretionary, and discretionary carryover is a commendable improvement. This categorization is crucial as it addresses a common reporting issue where organizations previously struggled to account accurately for different types of funding. However, the term "allocation" could be misleading, as subgrantees might interpret it as referring to the total funds allocated (awarded) rather than the amount expended.	Alternative Response	OCS acknowledges this comment and appreciates the feedback. As noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report.
500	Cathy Feltner	Embarras River Basin Agency	ERBA has concerns about some of the proposed changes:1. Employment Outcomes (Report 2.1 Module 3 Section B): Please restore the employment indicators (CNPI 1a, 1b, 1c, 1d, and 1e (or some combination of adult employment outcomes) from Report 2.1. Tracking and reporting employment gained and retention of employment over time are crucial to addressing the root auses of poverty. In recent years, CSBG has nationally reported creating nearly 35,000 jobs.	Request Change Not Accepted	OCS acknowledges this comment and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS
501	Cathy Feltner	Embarras River Basin Agency	ERBA has concerns about some of the proposed changes: 2. Case Management (Module 3, SRV3): Please include "case management" as a direct service with cascading outcomes in employment, housing, education, and other areas. Case management is the key to comprehensive and enduring family change as part of a whole-family approach (WFA). The CSBG Act directs Community Action Agencies to address the root causes of poverty. Case management is one of our best tools to accomplish this requirement because it is customer-centered and focuses on what individual families need.	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
502	Cathy Feltner	Embarras River Basin Agency	ERBA has concerns about some of the proposed changes:3. Outcome Language (Module 3): In several instances, NPIs proposed in Report 3.0 are stated as outputs (services), not outcomes. We encourage OCS to reword all NPIs using outcome language to reflect family-level change. Changing the NPIs back to outcome language reinforces the principles of ROMA and better captures the purpose of CSBG. Examples of NPIs stated as outputs instead of outcomes include FNPIs 2a, 2b, 2e, 3a, 4f, 4g, 5a, 5c, 5d, 5e, 5g, 5h, and 5i.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services..
503	Tara Murray	Decatur-Macon County Opportunities Corporation	I am writing from the Empowerment Opportunity Center, which is the Community Action Agency for Macon County, Illinois, to submit comments on ACF-OCS-CSBG-DCL-24-09 Annual Report 3.0 Revisions.The Empowerment Opportunity Center supports many of the proposed changes:1. Timeline for Implementation (Dear Colleague Memorandum page 4/8): IACAA supports the flexibility to states and subgrantees regarding the timeline to implement the new 3.0 report. Adjustments to processes, software, and training will require time, and OCS has recognized the need for flexibility between now and FY2026.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
504	Tara Murray	Decatur-Macon County Opportunities Corporation	The Empowerment Opportunity Center supports many of the proposed changes:2. Concrete Supports (Dear Colleague Memorandum page 1/8, Module 3 Section A, and Attachment B): IACAA supports the inclusion of Concrete Supports that do not require a cascading performance indicator. This reliance on established research and "proxy outcomes" simplifies the reporting process and should increase consistency and fidelity in aggregated data.	No Change or Response Needed	OCS appreciates this feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
505	Tara Murray	Decatur-Macon County Opportunities Corporation	The Empowerment Opportunity Center supports many of the proposed changes: 3. Promised Alignment of Demographics to Census Categories (Module 3, Section B): IACAA supports OCS's stated intent to align demographic categories on the Client Characteristics to the U.S. Census categories to promote respect and improve data usage and disaggregation for analysis.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
506	Tara Murray	Decatur-Macon County Opportunities Corporation	The Empowerment Opportunity Center supports many of the proposed changes: 4. Reduced Reporting Burden (Dear Colleague Memorandum page 1/8): Thank you for working to reduce the reporting burden on grant recipients and subrecipients.	Alternative Response	OCS acknowledges this comment and appreciates the feedback.
507	Tara Murray	Decatur-Macon County Opportunities Corporation	The Empowerment Opportunity Center supports many of the proposed changes:5. Module 2 CSBG Expenditure Reporting (Module 2 Section A): Breaking down CSBG allocation expenditures into regular allocation, carryover, discretionary, and discretionary carryover is a commendable improvement. This categorization is crucial as it addresses a common reporting issue where organizations previously struggled to account accurately for different types of funding. However, the term "allocation" could be misleading, as subgrantees might interpret it as referring to the total funds allocated (awarded) rather than the amount expended.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
508	Tara Murray	Decatur-Macon County Opportunities Corporation	The Empowerment Opportunity Center has concerns about some of the proposed changes:1. Employment Outcomes (Report 2.1 Module 3 Section B): Please restore the employment indicators (CNPI 1a, 1b, 1c, 1d, and 1e (or some combination of adult employment outcomes) from Report 2.1. Tracking and reporting employment gained and retention of employment over time are crucial to addressing the root causes of poverty. In recent years, CSBG has nationally reported creating nearly 35,000 jobs.	Alternative Response	OCS appreciates the feedback. The transportation domain uses the actual transportation service as the unit of measurement This has been revised to be more clear. For example, it's the number of gas cards, vouchers, rides, etc. vs. the number of people.
509	Tara Murray	Decatur-Macon County Opportunities Corporation	The Empowerment Opportunity Center has concerns about some of the proposed changes:2. Case Management (Module 3, SRV3): Please include "case management" as a direct service with cascading outcomes in employment, housing, education, and other areas. Case management is the key to comprehensive and enduring family change as part of a whole-family approach (WFA). The CSBG Act directs Community Action Agencies to address the root causes of poverty. Case management is one of our best tools to accomplish this requirement because it is customer-centered and focuses on what individual	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
510	Tara Murray	Decatur-Macon County Opportunities Corporation	The Empowerment Opportunity Center has concerns about some of the proposed changes:3. Outcome Language (Module 3): In several instances, NPIs proposed in Report 3.0 are stated as outputs (services), not outcomes. We encourage OCS to reword all NPIs using outcome language to reflect family-level change. Changing the NPIs back to outcome language reinforces the principles of ROMA and better captures the purpose of CSBG. Examples of NPIs stated as outputs instead of outcomes include FNPIs 2a, 2b, 2e, 3a, 4f, 4g, 5a, 5c, 5d, 5e, 5g, 5h, and 5i.	Request Change Not Accepted	OCS acknowledges this comment and the report represents national reporting.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
511	Kate Pielmeier	Downeast Community Partners	I'm writing to submit a comment on the proposed CSBG Annual Report changes (AR 3.0).While I think some of the merges and removals from AR 2.1 are appropriate, it's hard to say definitively that I agree with the proposal overall because the document in the Federal Register does not say which FNPIs or SRVs are being merged with which. Some of the ones being merged have larger sample sizes, so to combine those with other variables muddies the water. My general comment/suggestion would be to publish a more detailed document that specifically says which variables were merged/where, then allow for another	Alternative Response	OCS acknowledges this comment and intends to release additional technical assistance materials upon approval to aid in the implementation following the public comment process.
512	Kate Pielmeier	Downeast Community Partners	Some of the removed variables are still helpful for grant writing and grant reporting outside of CSBG, so Downeast Community Partners would likely still collect some of that data in line with AR 2.1	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
513	Kate Pielmeier	Downeast Community Partners	My second specific concern is with turning the Supportive Services Domain into just Transportation. I think it's a great idea to expand upon the Transportation service reporting and break it down by smaller categories (medical vs. nonmedical transportation, for example). However, there are other elements in the Supportive Services domain (as it is currently) that we would still like to report out on. I suppose I would almost rather see an eighth domain added as Transportation, and keep Supportive Services too.	Request Change Not Accepted	OCS acknowledges and appreciates this feedback. There are services in the current Services Supporting Multiple Domains (such as Child Care Subsidies/Payments, Day Centers, clothing assistance) that have been restructured into other domains. OCS reviewed the last five years worth of data submissions and technical requests and several of the services presented here were either underutilized or created a burden with capturing the correct unduplicated count. Therefore, OCS has removed them from the federal reporting requirement to minimize the collective
514	Denise L. Harlow	National Community Action Partnership (NCAP)	Dr. Howard,On behalf of the National Community Action Partnership (NCAP), thank you for the opportunity to provide public comments on the proposed changes to the information collection for the Community Services Block Grant (CSBG) Annual Report, entitled "Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Progress Report (Office of Management and Budget No. 0970-0492)," which was published in the Federal Register on April 22, 2024.1NCAP serves as the national membership association and hub that links over 1,000 Community Action Agencies (CAA) and State	No Change or Response Needed	No response required.
515	Denise L. Harlow	National Community Action Partnership (NCAP)	Fulfilling CSBG Act Requirements: The Act outlines key purposes of CSBG to be executed by the Network at the local level which include "to provide assistance to States and local communities, working through a network of community action agencies and other neighborhood-based organizations, for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient[.]"5 OCS should ensure that the proposed changes to the CSBG Annual Report are reflective of and clearly tie to all components of these purposes.	Alternative Response	OCS appreciates this feedback and notes that the remaining indicators align with the national goals as they are largely based on the current data points but written in a manner that aims to produce valid date that can be aggregated for national performance. THe added indicators are largely based on the qualitative data submitted by local agencies and states in the 'other' sections of the report, and removed indicators that were underutilized by the network writ large, or utilized for national reporting.
516	Denise L. Harlow	National Community Action Partnership (NCAP)	Meaningful Engagement: The current process limited the Network's input due to OCS' timing and lack of proactive communication regarding the changes. NCAP recommends that OCS engage meaningfully with the Network by releasing updates in a timely manner, considering CAAs' capacity to engage, and allowing enough time for feedback and co-creation of revisions that align with the array of needs assessed through unique community assessments by the 1000+ CAAs. We believe that this exchange of input should occur prior to the final clearance of Version 3.0.	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
517	Denise L. Harlow	National Community Action Partnership (NCAP)	Balancing Burden and Quality: It is crucial that OCS strike a balance in the proposed revisions that reduces reporting burdens while maintaining the data quality necessary to accurately showcase the impact of CAAs and meets the statutory requirements of the Act.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
518	Denise L. Harlow	National Community Action Partnership (NCAP)	Promote Local Flexibility: The Act supports the local flexibility and impact of CAAs and NCAP recommends that OCS avoid changes to reporting that will discourage or increase the difficulty of reporting the unique effort and impact of each local agency.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
519	Denise L. Harlow	National Community Action Partnership (NCAP)	Reflection of Community Action: The CSBG Annual Report should accurately represent and reflect the broad and diverse impacts of the Network in fulfilling its statutory purpose in addressing poverty, revitalizing communities, and empowering self-sufficiency; as well as represent and reflect the Network's outcomes orientation.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
520	Denise L. Harlow	National Community Action Partnership (NCAP)	Risk of Underreporting: NCAP is concerned about the potential underreporting of outcomes due to the proposed changes. With significant reductions of indicators and services, the proposed CSBG Annual Report Version 3.0 may not adequately capture the full scope of CAAs' efforts.	Alternative Response	OCS acknowledges this comment and aims to expand both the written and didactic training and technical assistance to support this new reporting schema to walk through which services align in specific domains and indicators.
521	Denise L. Harlow	National Community Action Partnership (NCAP)	Resource Allocation: NCAP recommends that OCS allocate additional resources towards training, costs associated with updates to software systems, and ongoing technical assistance to support the successful implementation of the revised report.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
522	Denise L. Harlow	National Community Action Partnership (NCAP)	II. The CSBG Annual Report is a crucial tool for addressing both the causes and conditions of povertyEstablished as part of the War on Poverty in 1964, the Network emerged from the Economic Opportunity Act which was designed to build grass-roots capacity to assess and implement solutions to local causes and conditions of poverty and make the entire community more responsive to the needs and interests of persons with low incomes—all with the use of federal resources. Although the administration of the funding and oversight have evolved since the inception of Community Action, the purpose of the funding remains the	Request Change Accepted	OCS acknowledges this comment and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
523	Denise L. Harlow	National Community Action Partnership (NCAP)	The Act requires the Department of Health and Human Services (HHS) to prepare and submit an annual report to Congress outlining the activities and performance outcomes achieved through CSBG funding. Specifically, the report must include information on how the funds were utilized, the number and characteristics of low-income individuals served, performance measurements for both states and local CAAs, and the impact of the services provided. HHS compiles the annual report using data collected and reported by local CAAs and State CSBG Offices before submitting the report to the congressional committees of jurisdiction.After	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
524	Denise L. Harlow	National Community Action Partnership (NCAP)	III. NCAP supports a robust regulatory review process for changes to the CSBG annual report information collection request (ICR)Opportunities for Network engagement in the process to develop updates to the CSBG Annual Report must be rigorous and foster maximum feasible participation. NCAP has significant concerns that the current process, while technically in compliance with minimum federal requirements for information collection requests, has provided insufficient engagement with the Network and, therefore, could yield results that do not accurately reflect the feedback and experiences of those who will be most affected	Alternative Response	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements
525	Denise L. Harlow	National Community Action Partnership (NCAP)	Additionally, during the 2016-2017 ICR process, OCS reviewed comments it received during the initial 60-day comment period for nearly three months before sending the ICR package to OMB, allowing agency reviewers ample time to consider concerns and recommendations. In the current process, OCS has allotted itself only five working days (June 24, 2024, to June 28, 2024) to complete comment analysis and consideration of requested changes.13 OCS has encouraged interested parties “to submit … comments as soon as possible, in order to expedite the clearance process,” but optional early submission and review does not	Alternative Response	On June 28, OCS released a Dear Colleague Letter announcing the processing for the final 30 days on Annual Report 2.1, the Tribal Annual Report, and Tribal Short Form while we continue to reconcile the comments submitted on Annual Report 3.0. Once all comments have been reconciled, ACF will prepare Annual Report 3.0 for final comment and OMB approval.
526	Denise L. Harlow	National Community Action Partnership (NCAP)	Although there are some positive changes, given the number and nature of challenges with the proposed CSBG Annual Report 3.0 and the lack of intentional Network engagement, we ask OCS to consider clearing CSBG Annual Report Version 2.1 and then live into its commitment to “lift up voices from the field” by strategically and robustly engaging Community Action experts prior to the clearance of CSBG Annual Report 3.0. This will allow uninterrupted data collection and provide time for a collaborative revision process that genuinely reduces burden while preserving the report's quality and integrity. We believe OCS and the	Alternative Response	On June 28, OCS released a Dear Colleague Letter announcing the processing for the final 30 days on Annual Report 2.1, the Tribal Annual Report, and Tribal Short Form while we continue to reconcile the comments submitted on Annual Report 3.0. Once all comments have been reconciled, ACF will prepare Annual Report 3.0 for final comment and OMB approval.
527	Denise L. Harlow	National Community Action Partnership (NCAP)	IV. Necessity of information for the proper performance measurement of Federal, State, or local agenciesIn general, we agree that the information collected is necessary for the proper performance measurement of state and local agencies, although NCAP noted areas in Module 1 that may not be necessary for effective performance measurement or statutorily supported and noted proposed streamlining of data points in Modules 3 and 4 to where proper performance measurement may not be possible.	No Change or Response Needed	No response required.
528	Denise L. Harlow	National Community Action Partnership (NCAP)	National Program GoalsThe CSBG Act identifies three national goals of CSBG: (1) reduce poverty, (2) empower lowincome families and individuals to become self-sufficient, and (3) revitalize low-income communities.17 In a 2019 report, the Government Accountability Office (GAO) described that the existing performance management system did not appear to adequately address these three goals and recommended that the national measures, as collected through the CSBG Annual Report, link to the three goals.18 In response to GAO’s recommendations, OCS restructured its performance measures, which are outlined each year in the	Alternative Response	OCS appreciates this comment and notes the measures highlighted here as developmental measures were retrofitted to the indicators in AR 2.1 but statistically, one of those measures equals about 30-40 indicators which would create an inaccurate count of the work local agencies do each day. The updated Annual Report create more opportunity for an update to developmental measures that capture the work of the diverse services offered across the nation with nearly 1,000 local agencies while ensuring the data reported is statistically sound and present valid data.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
529	Denise L. Harlow	National Community Action Partnership (NCAP)	Additionally, the ongoing instruction that CSBG Annual Report 3.0 Module 4 as "optional" greatly reduces the number of CAAs and States reporting on their community-level change efforts which will impact measure 12B. If the proposed changes are approved, it is our view OCS will not have quality data to report on the two performance measures nor will it meet leading practices in federal performance management noted by GAO in their report.	Request Change Not Accepted	OCS acknowledges this comment and notes that Community Level Transformation is recommended but not required due to the content of submissions in previous years, indicating the need for increased technical assistance and also keep in mind there are a vast array of state and local agencies that may not have the capacity to carry out a transformation initiative based on their funding levels. OCS believes that with enhanced training and technical assistance once we have addressed data validity in the current reporting structure, we can work collectively to build capacity
530	Denise L. Harlow	National Community Action Partnership (NCAP)	It is this view and others noted below that compel us to recommend OCS clear CSBG Annual Report 2.1 now, maintaining continuity of reporting, and then engage the Network in deeper discussion to inform better improvements to CSBG Annual Report 3.0.	Alternative Response	On June 28, OCS released a Dear Colleague Letter announcing the processing for the final 30 days on Annual Report 2.1, the Tribal Annual Report, and Tribal Short Form while we continue to reconcile the comments submitted on Annual Report 3.0. Once all comments have been reconciled, ACF will prepare Annual Report 3.0 for final comment and OMB approval.
531	Denise L. Harlow	National Community Action Partnership (NCAP)	Data Points Removed from CSBG Annual Report 3.0 Module 1In CSBG Annual Report Version 3.0, OCS removed Module 1, Section D that was previously found in Version 2.0 on page 8 which reported aggregated Organizational Standards compliance. OCS states that they will continue to monitor this data point through other means. While this may streamline state reporting, state CSBG offices are still required to monitor CAAs for compliance with the Organizational Standards annually and collect this data. Reporting to OCS through this mechanism provides a cohesive review of a state's performance and can help provide insight into key	Request Change Not Accepted	OCS acknowledges this comment and highlights the Organizational Standards will continue to be an element monitored by the federal office as its included in another OMB approved instrument (CSBG Model Plan and Application) amongst a few other monitoring activities. State and local agencies are still required to monitor these standards, but following OMB approval, grant recipients and sub recipients should expect to see additional policy and guidance on organizational standards.
532	Denise L. Harlow	National Community Action Partnership (NCAP)	OCS also removed Module 1, Section B data points B.2 and B.3 (found in Version 2.0 on pages 5 - 6) that report state American Customer Satisfaction Index (ACSI) scores and CSBG eligible entity feedback. OCS states that they will continue to exercise oversight over this key element of CSBG State Office performance, but the mechanism for that oversight is unclear. A State's ACSI score reflects effective administration of CSBG as determined by its customers, local CAAs. To ensure transparency in evaluating state performance, NCAP recommends OCS include State ACSI data points B.2 and B.3 in the updated CSBG Annual Report 3.0.	Alternative Response	OCS acknowledges this comment and notes that through program oversight, grant administration, and the state plan process, states will continue to receive their ACSI information. Following OMB approval, OCS will release additional guidance on the elements that have been repurposed to clearly identify the pathways to obtain information no longer included in the report.
533	Denise L. Harlow	National Community Action Partnership (NCAP)	Removal of Individual and Family Services and Family National Performance Indicators (FNPIs) in CSBG Annual Report 3.0 Module 3 In the Dear Colleague letter titled ACF-OCS-CSBG-DCL-24-09 Annual Report 3.0 Revisions, OCS reiterates their commitment to reducing the reporting burden of the CSBG Annual Report and indicates to that end it has eliminated 161 indicators from the CSBG Annual Report Version 3.0. CAAs are required by the Act to conduct local community assessments to inform their efforts to alleviate the causes and conditions of poverty. State CSBG Offices are charged with ensuring that CAAs fulfill this obligation by exercising	Alternative Response	OCS acknowledges this comment and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS
534	Denise L. Harlow	National Community Action Partnership (NCAP)	While reducing burden is essential, it must be balanced with maintaining the quality of the report to ensure it is reflective of the work CAAs do and the change they create. The proposed streamlining of services and outcomes in the CSBG Annual Report Version 3.0 comes at the cost of being able to effectively detail Community Action efforts. NCAP is concerned that the proposed changes will not provide the level of detail needed for locals to clearly articulate the connection of their strategies and changes to their Community Assessment and add burden to states to effectively engage in required oversight. Additional details on the	Alternative Response	OCS acknowledges this comment and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
535	Denise L. Harlow	National Community Action Partnership (NCAP)	Federal Reporting of Technical Assistance PlansOCS proposes changes to the CSBG Annual Report in sections H.4 of Version 2.1 and sections F.4, and F.5 in Version 3.0, which require states to report on Technical Assistance Plans (TAPs) to OCS. The Act recognizes Quality Improvement Plans (QIPs) for addressing issues of noncompliance; TAPs were introduced as additional tools to collaboratively support compliance with the CSBG Organizational Standards. State CSBG offices are responsible for oversight of CSBG Eligible Entities (typically CAAs), ensuring they meet their CSBG obligations. Due to the nature of the block grant, CSBG State	Request Change Not Accepted	OCS acknowledges this comment and revised this element to continue monitoring technical assistance from states to local agencies specific to non-compliance as a statutory requirement specific to technical assistance. OCS recognizes there are multiple tools available to states to work closely with local agencies for corrective action and is not requiring the use of any specific tools, but is asking for infomration from grant recipients that do use these tools so that we aware on any ongoing noncompliance issues.
536	Denise L. Harlow	National Community Action Partnership (NCAP)	Training and Technical Assistance Evaluation MeasuresIn the proposed changes to CSBG Annual Report Version 3.0, OCS included a new datapointwithin D.1 State Training and Technical Assistance to require information on “evaluationmeasures.” It is unclear what OCS is attempting to capture here, making it difficult to providemeaningful feedback. The Act requires states to provide a summary of TTA offered but does notrequire that specific evaluation measures be reported to OCS. Additionally, it is unclear how thisinformation is necessary for OCS oversight, as decisions on state-funded TTA are made at thestate level. Including "Evaluation	Request Change Not Accepted	OCS acknowledges this comment and appreciates this feedback. The addition of evaluation measures helps to demonstrate how states are held accountable for measuring the success of the training and technical assistance provided. It could be a simple survey to local agencies to identify if they felt the training helped or something much more robust. According to the State Accountability Measure "The State completed the training and technical assistance activities specified in its State plan, and/or made appropriate adjustments in response to unanticipated
537	Denise L. Harlow	National Community Action Partnership (NCAP)	V. BurdenIn a Dear Colleague Letter (DCL) explaining the proposed revisions, OCS detailed that it has proposed significant changes to the CSBG Annual Report in Version 3.0 in an attempt torespond to subrecipient concerns about burden and in service to its commitment to “lifting up voices from the field.”21 NCAP and its member agencies agree that the CSBG Annual Reportproduces significant burdens for the Network and applauds OCS’ commitment to examining approaches to reduce this burden. However, we have significant concerns that the proposedchanges do not effectively achieve this goal and may, in fact, hinder the	Alternative Response	OCS acknowledges this comment and appreciates the feedback. The report revisions were to ensure we addressed the expansive nature of performance measures across CSBG while meeting the requirements of the CSBG Act, the findings of the CSBG Government Accountability Office (GAO) report, and minimize the burden on the public under the Paperwork Reduction Act. The connection between service to outcome also enhances how we tell the national story of CSBG.
538	Denise L. Harlow	National Community Action Partnership (NCAP)	Burden Related to Proposed Module RevisionsThe proposed changes will necessitate extensive and costly updates to data systems across theNetwork, including software modifications, new data collection protocols, and systemreconfigurations to accommodate the revised report format. While some data system updates willoccur through enterprise updates with minimal immediate costs to the Network, CAAs and stateswill likely incur additional costs due to necessary customizations to collect necessary datapointsthat were streamlined at the federal level. Additionally, significant human capital will be	Alternative Response	OCS acknowledges this comment and shares that during the two-year phased implementation, we will increase our training and technical assistance on these reporting structures and as we currently provide the coding for databases at no-cost, we will continue to so systems can be updated to reflect the collection of information. OCS also emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds
539	Denise L. Harlow	National Community Action Partnership (NCAP)	In CSBG Annual Report Version 3.0, OCS proposes swapping Modules 3 (currently CommunityLevel Transformation in Version 2.0, to become Individual and Family Level) and 4 (currentlyIndividual and Family Level in Version 2.0, to become Community Level). These changesnecessitate system updates and additional training, imposing unnecessary costs and time burdenson agencies. CAA staff have just become accustomed to the current structure, as reported byNCAP members. We see no legitimate program or performance need that necessitates thischange. The Act affirms that CSBG should focus on both community change	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
540	Denise L. Harlow	National Community Action Partnership (NCAP)	Changes in Reporting PeriodIn CSBG Annual Report 3.0, OCS proposes that all reporting align with the Federal Fiscal Year(October 1 – September 30), starting from Federal Fiscal Year 2026. This change can enhancethe national story and reporting quality by ensuring consistency across all reports. However,agencies not currently reporting on the Federal Fiscal Year will face significant burdens,including the need to update contracts, modify software systems, and retrain staff. On itslistening sessions held with the CSBG Network, OCS explained that they expected this shift tobe minor and that changes in state contract	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we’re using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
541	Denise L. Harlow	National Community Action Partnership (NCAP)	Reduced Datapoints and BurdenThe CSBG Annual Report functions as a comprehensive menu of reporting options, reflecting the diverse services, strategies, and impacts tailored to local community needs as identified through Community Assessments. CAAs, as diverse as the communities they serve, require a broad array of data points to accurately report their unique efforts and outcomes. While OCS asserts that reducing the number of data points will lessen the burden, it may instead dilute the richness of the Community Action story. CAAs do not report on every data point contained in the CSBG Annual Report; thus,	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
542	Denise L. Harlow	National Community Action Partnership (NCAP)	Reduced Datapoints and BurdenOCS has also suggested that CAAs can capture additional data points locally even if they are removed from the federal report. This approach imposes extra costs, as CAAs will need to customize their databases to include these commonly reported data sets, which often cover critical outcomes like job obtainment or educational improvements. Furthermore, several states have statutory requirements to collect specific data points included in the current CSBG Annual Report. These states will now have to customize their statewide databases (if available) to continue collecting this data, effectively shifting the	Alternative Response	OCS acknowledges this comment and shares that during the two-year phased implementation, we will increase our training and technical assistance on these reporting structures and as we currently provide the coding for databases at no-cost, we will continue to so systems can be updated to reflect the collection of information. OCS also emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds
543	Denise L. Harlow	National Community Action Partnership (NCAP)	Burden EstimateNCAP understands that multiple factors create challenges when developing burden hour estimates, including the diversity of respondents' capacities, data systems, and collection activities. Additionally, we recognize that the PRA process allows for adjustments in estimated burden hours based on comments received during the initial 60-day comment period and prior to agency submission of the ICR to OMB. OCS has indicated repeatedly that a major driver of the proposed changes in Version 3.0 is reporting burden reduction, a shared goal of the Network.Because burden reduction is so critical to these proposed changes,	Alternative Response	OCS acknowledges this comment and appreciates this feedback and will update the burden estimate with the issuance of the final 30-day notice.
544	Denise L. Harlow	National Community Action Partnership (NCAP)	NCAP believes OCS has overestimated the burden reduction associated with Version 3.0.The claimed reduction, based on the percentage decrease in indicators, does not account for theactual workload involved in data aggregation and reporting. Fewer data points can paradoxicallyincrease reporting burden by requiring CAAs to report multiple programs under a singleindicator or service, necessitating time-consuming deduplication and integration of datasets.Deduplication is one of the most significant sources of burden for CAAs in completing theCSBG Annual Report. For example, a CAA may operate an	Alternative Response	OCS utilized the burden estimate formula developed for the current annual report and adjusted it based on the reductions and kept in mind there would be initial increases in burden to account for the changes during the periods where there is an overlap of 2.1 and 3.0 reports in FY26 (3.0 is optional in FY26 before becoming mandatory in FY27) but that it would adjust over time. It should be noted that burden estimates are largely estimates and the federal office through an incremental implementation intends to provide expansive technical assistance and
545	Denise L. Harlow	National Community Action Partnership (NCAP)	VI. QualityThe proposed changes in Version 3.0 significantly compromise the quality of the CSBG Annual Report on several fronts. As previously described, the CSBG Annual Report serves as a crucial tool in detailing how CAAs strategically allocate those resources to reduce poverty, revitalize low-income communities, and empower low-income families and individuals in rural and urban areas to become fully self-sufficient[.]30. As detailed below, OCS's proposed elimination of numerous data points results in the report losing its capacity to comprehensively convey the diverse and nuanced approaches CAAs deploy to meet these localized	Alternative Response	OCS appreciates this feedback.
546	Denise L. Harlow	National Community Action Partnership (NCAP)	Services Supporting Multiple DomainsIn the proposed changes to CSBG Annual Report Version 3.0, OCS has eliminated the option to report "Services Supporting Multiple Domains," eroding a fundamental aspect of Community Action's holistic, person-centered approach to services. This omission significantly diminishes the report's quality, excluding crucial cross-cutting services such as case management, eligibility determinations, referrals, identification documents, reentry services, immigration support services, legal assistance, and mediation/customer advocacy (See CSBG Annual Report Version 2.1, Module 4, Section B, Services Supporting	Request Change Not Accepted	OCS acknowledges and appreciates this feedback. There are services in the current Services Supporting Multiple Domains (such as Child Care Subsidies/Payments, Day Centers, clothing assistance) that have been restructured into other domains. OCS reviewed the last five years worth of data submissions and technical requests and several of the services presented here were either underutilized or created a burden with capturing the correct unduplicated count. Therefore, OCS has removed them from the federal reporting requirement to minimize the collective

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
547	Denise L. Harlow	National Community Action Partnership (NCAP)	Outputs Reported as Outcomes in CSBG Annual Report Version 3.0The proposed revisions to CSBG Annual Report Version 3.0, Module 3, Section B (Individual and Family National Performance Indicators or FNPIs) include a mixture of outputs and outcomes, which blur the distinction between the activities undertaken by agencies and the tangible impacts achieved as a result of these endeavors. This is a significant departure from established Community Action performance management principles, including the Results-Oriented Management and Accountability (ROMA) framework (as included in the OCS Performance,	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional langauge (i.e.: increase or decrease) to better capture change and the impact of services
548	Denise L. Harlow	National Community Action Partnership (NCAP)	Further, adding outputs as FNPIs as proposed in the changes from OCS that are duplicative of reported services adds burden and complexity to reporting that will not improve report quality.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional langauge (i.e.: increase or decrease) to better capture change and the impact of services
549	Denise L. Harlow	National Community Action Partnership (NCAP)	NCAP would also recommend that OCS consider revising proposed FNPI language that includes references to people served, as the outcome is meant to reflect the change in status as a result of the output or unit of service.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional langauge (i.e.: increase or decrease) to better capture change and the impact of services
550	Denise L. Harlow	National Community Action Partnership (NCAP)	In addition to the other changes noted in our comments, NCAP proposes revisions to Section B FNPIs that reflect outputs rather than outcomes in CSBG Annual Report Version 3.0, Module 3, including:OCS Proposed CSBG Annual Report Version 3.0 FNPI Identified as Outputs: FNPI 2a. The number of young children (0-5) enrolled in childcare or early childhood education services. (Note: as written this indicator duplicates SRV 2a and 2b)	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional langauge (i.e.: increase or decrease) to better capture change and the impact of services
551	Denise L. Harlow	National Community Action Partnership (NCAP)	OCS Proposed CSBG Annual Report Version 3.0 FNPI Identified as Outputs: FNPI 2b. The number of youth actively connected to education and skills development programs.	Alternative Response	OCS acknowledges this comment, but a key concern with denoting milestones is recognizing the absence of a pre and post test that can help with data validity and recognition that not every agency has the infrastructure to confirm this. The indicator has been updated to include some directional language to be an output for access for youth.
552	Denise L. Harlow	National Community Action Partnership (NCAP)	OCS Proposed CSBG Annual Report Version 3.0 FNPI Identified as Outputs: FNPI 2e. The number of individuals who enrolled in a post-secondary degree program (e.g., associates, bachelors, etc.)	Request Change Not Accepted	OCS acknowledges this comment and appreciates the feedback. Keeping FNPI 2e allows measure of those who increased in education although not yet having obtained a degree.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
553	Denise L. Harlow	National Community Action Partnership (NCAP)	OCS Proposed CSBG Annual Report Version 3.0 FNPI Identified as Outputs: FNPI 3a. The number of individuals completing income and asset building training.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain).
554	Denise L. Harlow	National Community Action Partnership (NCAP)	OCS Proposed CSBG Annual Report Version 3.0 FNPI Identified as Outputs: Becomes FNPI 4f. The number of individuals served with energy assistance or energy efficiency homes.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain).
555	Denise L. Harlow	National Community Action Partnership (NCAP)	OCS Proposed CSBG Annual Report Version 3.0 FNPI Identified as Outputs: FNPI 5b. The number of individuals with access to health coverage.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain).
556	Denise L. Harlow	National Community Action Partnership (NCAP)	OCS Proposed CSBG Annual Report Version 3.0 FNPI Identified as Outputs: FNPI 5c. The number of individuals receiving reproductive services. (Note: as written this indicator duplicates SRV 5f and 5g)	Request Change Not Accepted	OCS acknowledges this comment and appreciates this suggested revision. The two suggested here require pre and post test which can be difficult to obtain equitably across all local agencies.
557	Denise L. Harlow	National Community Action Partnership (NCAP)	OCS Proposed CSBG Annual Report Version 3.0 FNPI Identified as Outputs: FNPI 5d. The number of individuals receiving wellness services. (Note: as written this indicator duplicates SRV 5h)	Request Change Not Accepted	OCS acknowledges this comment and appreciates this suggested revision. The two suggested here require pre and post test which can be difficult to obtain equitably across all local agencies.
558	Denise L. Harlow	National Community Action Partnership (NCAP)	OCS Proposed CSBG Annual Report Version 3.0 FNPI Identified as Outputs: FNPI 5e. The number of older adults (age 65+) receiving home visiting services. (Note: as written this indicator duplicates SRV 5i)	Request Change Not Accepted	OCS acknowledges this comment but the term maintain would require a benchmark that cannot be generally applied across the vast array of local agencies therefore creates issues around data validity.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
559	Denise L. Harlow	National Community Action Partnership (NCAP)	OCS Proposed CSBG Annual Report Version 3.0 FNPI Identified as Outputs: FNPI 5g. The number of adults receiving preventative oral health services.	Request Change Not Accepted	OCS acknowledges this comment. Research and HHS wide data (Healthy People 2030) provide evidence that the access and receipt of oral health services leads to improved health outcomes. The change requested introduce the term maintain which can assert that local agencies can track the maintaining of oral health services rather than the access to it. The indicator was updated to include more directional language to read like an output.
560	Denise L. Harlow	National Community Action Partnership (NCAP)	OCS Proposed CSBG Annual Report Version 3.0 FNPI Identified as Outputs: FNPI 5h. The number of children receiving preventative oral health services.	Request Change Not Accepted	OCS acknowledges this comment. Research and HHS wide data (Healthy People 2030) provide evidence that the access and receipt of oral health services leads to improved health outcomes. The change requested introduce the term maintain which can assert that local agencies can track the maintaining of oral health services rather than the access to it. The indicator was updated to include more directional language to read like an output.
561	Denise L. Harlow	National Community Action Partnership (NCAP)	OCS Proposed CSBG Annual Report Version 3.0 FNPI Identified as Outputs: FNPI 5i. The number of individuals receiving access to healthy food options. (Note: as written this indicator duplicates SRV 5q)	Alternative Response	OCS acknowledges this comment but will not update because the use of the term 'better' may be subjective and infer the circumstances across all agencies are similar. The indicator was revised to include more directional language.
562	Denise L. Harlow	National Community Action Partnership (NCAP)	Reduced CSBG Annual Report Version 3.0 FNPIsOCS proposes a significant reduction of FNPIs in CSBG Annual Report Version 3.0. While OCS remains focused on reducing burden, consideration must be given to balancing the need for reduced burden with data quality. The proposed streamlining of FNPIs risks presenting an incomplete picture of agency impact, thereby diminishing reporting quality. Notably, the reduced focus on employment outcomes, now primarily centered on skills enhancement and income augmentation, overlooks critical metrics such as job attainment, retention, and career advancement. Similarly, the	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
563	Denise L. Harlow	National Community Action Partnership (NCAP)	While the consolidation of outcomes may streamline reporting processes, it poses challenges regarding flexibility and the ability to demonstrate impact. In the current report, CAAs have this flexibility through the reporting of “Z” indicators, which allow CAAs to develop their own outcomes. CAAs use “Z” indicators to report these custom outcomes, crucial for gathering comprehensive data at local, state, and national levels, and can be used as a critical dataset to inform future improvements of the CSBG Annual Report.The reduction in reportable outcomes, coupled with the removal of “z” indicators, may constrain agencies' capacity to	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an ‘other’ with requirement of description.
564	Denise L. Harlow	National Community Action Partnership (NCAP)	In addition to the other changes noted in this document, NCAP has provided specific recommendations regarding FNPIs that were available in Version 2.1 but have been streamlined or eliminated in Version 3.0. Details of our recommendations can be found in thechart below:CSBG Annual Report Version 2.1 Module 4 Section A (Individual & Family Services) Streamlined FNPIs: FNPI 1b. The number of unemployed adults who obtained employment (up to a living wage). / FNPI 1e. The number of unemployed adults who obtained employment (with a living wage or higher). Comments:- Job attainment is a common, essential	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
565	Denise L. Harlow	National Community Action Partnership (NCAP)	CSBG Annual Report Version 2.1 Module 4 Section A (Individual & Family Services) Streamlined FNPIs: FNPI 1c./FNPI 1d./FNPI1f./FNPI1g. The number of unemployed adults who obtained and maintained employment up to a living wage/with a living wage or higher for 90/180 daysComments: - These outcomes have been burdensome for the Network due to the required subset reporting by living wage and by period of time.- The outcome misses assistance provided by CAAs to help people who are already employed maintain their employment.	Request Change Not Accepted	OCS acknowledges this comment and removed the tracking of employment in increments to address the burden and also concerns around data validity.
566	Denise L. Harlow	National Community Action Partnership (NCAP)	CSBG Annual Report Version 2.1 Module 4 Section A (Individual & Family Services) Streamlined FNPIs: FNPI 2d. The number of children and youth who are achieving at basic grade level (academic, social, and other school success skills). Comments: - This FNPI shows the results of enrollment in agency services and programs. It is a critical outcome for agencies that are pursuing Whole Family 2/Generation approaches and other evidence-informed promising practices.- In the prior report, this datapoint required a breakdown by grade; this could be simplified to still capture the impact while reducing burden.	Request Change Not Accepted	OCS acknowledges this comment and notes this indicator has resulted in signficant issues with data validity based on technical assistance requests. OCS agrees the whole family approach is an important element and acknowledges there are multiple ways to capture the same end through different data means.
567	Denise L. Harlow	National Community Action Partnership (NCAP)	CSBG Annual Report Version 2.1 Module 4 Section A (Individual & Family Services) Streamlined FNPIs: FNPI 2e. The number of parents/caregivers who improved their home environments. Comments: - This outcome is important to capture Whole Family/2 Gen approaches and other evidence- informed promising practices.- Agencies using this indicator usually have some form of assessment they administer to measure change.	Request Change Not Accepted	OCS acknowledges this comment and will not change this element as the term 'improve' is subjective and without a universal defintion and understanding (which could create issues with the local flexibility vital to the funding) it creates concerns around data validity.
568	Denise L. Harlow	National Community Action Partnership (NCAP)	CSBG Annual Report Version 2.1 Module 4 Section A (Individual & Family Services) Streamlined FNPIs: FNPI 2f. The number of adults who demonstrated improved basic education. Comments: - This outcome captures the change in status from CAA services and is a critical outcome to helping individuals achieve social and economic mobility.	Request Change Accepted	OCS acknowledges this comment and restored an indicator that measures adults attaining basic education skills.
569	Denise L. Harlow	National Community Action Partnership (NCAP)	CSBG Annual Report Version 2.1 Module 4 Section A (Individual & Family Services) Streamlined FNPIs: FNPI 3d. The number of individuals who increased their savings. Comments: - CAAs do extensive work in the financial well- being/financial literacy area with individuals to improve their financial condition and assets; this outcome captures a portion of these efforts	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain).
570	Denise L. Harlow	National Community Action Partnership (NCAP)	CSBG Annual Report Version 2.1 Module 4 Section A (Individual & Family Services) Streamlined FNPIs: FNPI 3e.1 Of the above, the number of individuals who purchased a home. Comments: - CAAs offer homebuying assistance; this outcome captures this important milestone in supporting social and economic mobility.- Even if the numbers are small, this is a high impact outcome as housing and particularly home-ownership is a lever for other outcomes, a protective factors, and a gateway to build generational wealth.- The prior report required this as a subset of a larger indicator, which created burden.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain).

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
571	Denise L. Harlow	National Community Action Partnership (NCAP)	CSBG Annual Report Version 2.1 Module 4 Section A (Individual & Family Services) Streamlined FNPIs: FNPI 5d. The number of individuals who improved skills related to the adult role of parents/caregivers. Comments: - This outcome is essential to capturing the impact of CAAs when working in Whole Family/2 Gen Approaches and other evidence-informed practices.- CAAs that operate Head Start and Early Head Start achieve outcomes in this area as part of the Parent, Family, and Community Engagement Framework services which are often integrated with a variety of CAA services.- Agencies that conduct this work use assessment tools to	Request Change Not Accepted	OCS acknowledges this comment and will not change this element as the term 'improve' is subjective and without a universal defintion and understanding (which could create issues with the local flexibility vital to the funding) it creates concerns around data validity.
572	Denise L. Harlow	National Community Action Partnership (NCAP)	CSBG Annual Report Version 2.1 Module 4 Section A (Individual & Family Services) Streamlined FNPIs: FNPI 6a.2 The number of Community Action program participants who improved their social networks. Comments: - Increasing bonding social capital is an important outcome of some CAA programs, especially Whole Family/2 Generation Approaches	Request Change Not Accepted	OCS acknowledges this comment and will not change this element as there is a great deal of subjectivity in the design of this indicator leading to questions around its validity and also demonstrating the longer term connections to the national goals.
573	Denise L. Harlow	National Community Action Partnership (NCAP)	CSBG Annual Report Version 2.1 Module 4 Section A (Individual & Family Services) Streamlined FNPIs: FNPI 1z; FNPI 2z; FNPI 3z; FNPI 4z; FNPI 5z; FNPI 6z; FNPI 7z Comments: - Because CAAs are statutorily required to develop strategies to meet unique local needs, CAAs need flexibility to report indicators beyond standard FNPIs included in the CSBG Annual Report.- z indicators reflect the importance of local control in designing services and outcomes to respond to local needs	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an ‘other’ with requirement of description.
574	Denise L. Harlow	National Community Action Partnership (NCAP)	It is important to again recognize that reduction in reportable outcomes does not necessarily alleviate the reporting burden, given that CAAs use the CSBG Annual Report as a menu of possible reportable outcomes and never reporting on all outcomes contained therein. Therefore, maintaining a diverse range of potential outcomes is essential to accurately reflect the broad impact of the national Network and ensure robust reporting quality.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
575	Denise L. Harlow	National Community Action Partnership (NCAP)	NCAP supports removing Outcome 7a from the prior CSBG Annual Report Version 2.1 in the revised CSBG Annual Report 3.0 to reduce burden which is driven by deduplication efforts needed to report in this datapoint.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
576	Denise L. Harlow	National Community Action Partnership (NCAP)	Reduced CSBG Annual Report Version 3.0 Individual and Family Services In CSBG Annual Report 3.0, Module 3, Section A, OCS has proposed a significant reduction of reportable services, aiming to reduce the burden on agencies by consolidating and eliminatingvarious service categories. While the removal of duplicative services could reduce the reporting burden, the streamlining proposed may ultimately compromise the quality, comprehensiveness of the CSBG Annual Report, and the report’s alignment with statuary expectations for CSBG impact. By consolidating services to the point where the specific and varied efforts of CAAs	Alternative Response	OCS appreciates this feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
577	Denise L. Harlow	National Community Action Partnership (NCAP)	Specifically, NCAP recommends OCS consider streamlined services (revised or removed) and their unintended consequences, including: CSBG Annual Report Version 2.1 Module 4 Section B (Individual & Family Services) Streamlined Datapoints: SRV 1a – 1q (Employment Services)Challenges:- The streamlining of services in the Employment domain eliminated services beyond supplies and job skills training; CAAs provide a broad range of services in this domain.- Coaching was removed as a service here and under other domains. Coaching and/or case management are critical services to helping achieve employment	Alternative Response	OCS acknowledge this comment. The employment domain has had some indicators restored, but notes there are services that are underutilized by those reporting writ large so the recommendation is that for uniquely delivered services, local agencies utilize the 'Other' category or utilize the Community Level Transformation for larger scale approaches.
578	Denise L. Harlow	National Community Action Partnership (NCAP)	CSBG Annual Report Version 2.1 Module 4 Section B (Individual & Family Services) Streamlined Datapoints: SRV 2r-z (Adult Education Programs)Challenges:- The proposed streamlined services no longer include education services for adults related to post-secondary education and eliminated parenting supports – both key elements of CAA programming including 2 Gen/Whole Family approaches and other evidence-informed practices.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain).
579	Denise L. Harlow	National Community Action Partnership (NCAP)	CSBG Annual Report Version 2.1 Module 4 Section B (Individual & Family Services) Streamlined Datapoints: SRV 2cc Home Visits (Home Visits)Challenges: - The service list in Version 2.1 Module 4, Section B. includes the service “home visits” within the education domain. The CSBG Annual Report Lexicon defines this service as “services related to early learning, health, and family well-being that occur in the family’s home. This service is provided in addition to other educational opportunities.”32 The current CSBG Annual Report service list includes a mix of services and common CAA programs - For example, Early Head Start, Parents as	Alternative Response	OCS acknowledges this comment and intends to review all current published TTA materials to right size them with updated guidance on the federal reporting requirements.
580	Denise L. Harlow	National Community Action Partnership (NCAP)	CSBG Annual Report Version 2.1 Module 4 Section B (Individual & Family Services) Streamlined Datapoints: SRV 3a – 3f; 3m – 3o (Income Management and Asset Building)Challenges: - The streamlined services merge many CAA services into proposed SRV 3a, which dilutes the ability of CAAs to detail their specific approaches in response to community needs. Additionally, this outcome is a high impact outcome as asset building is a lever for other outcomes that are protective factors, and a gateway to generational wealth.- Many CAAs are informed by the Consumer Financial Protection Bureau's (CFPB) research and tools on financial	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain).
581	Denise L. Harlow	National Community Action Partnership (NCAP)	CSBG Annual Report Version 2.1 Module 4 Section B (Individual & Family Services) Streamlined Datapoints: SRV 4a-4b; 4i-l; and 4r- 4sChallenges: - Within housing services, CAAs do more than just provide direct cash assistance; many employ certified housing counselors who offer extensive support beyond simply arranging for a housing payment.- In Version 3.0, the program category Utility Payment Assistance (SRV 4i-l) was combined under Eviction Prevention Services. We advocate for utility assistance to be reinstated as a distinct category separate from eviction prevention services.- The program category Utility payment Assistance	Alternative Response	OCS acknowledges this comment and appreciates this feedback. The services mentioned are captured in the revised report under SRV 4c, 4f, 4f, and 4d respectively.
582	Denise L. Harlow	National Community Action Partnership (NCAP)	CSBG Annual Report Version 2.1 Module 4 Section B (Individual & Family Services) Streamlined Datapoints: SRV 6b (Leadership Training)Challenges: - Eliminated service related to leadership training; this service may not be reported by all CAAs but is reflective of CAAs efforts to maintain the fidelity of their statutory mission to empower low- income persons and revitalize communities.	Request Change Not Accepted	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
583	Denise L. Harlow	National Community Action Partnership (NCAP)	CSBG Annual Report Version 2.1 Module 4 Section B (Individual & Family Services) Streamlined Datapoints: SRV 7a – c; SRV 7h -m; SRV o (Services Supporting Multiple Domains)Challenges: - As detailed in these comments in Part VI. Quality – Section Services Supporting Multiple Domains, OCS proposes elimination of key services including Case Management (SRV 7a); Eligibility Determinations (SRV 7b); Referrals (SRV 7c); Identification documents (SRV 7h-j); Reentry Services(SRV 7k); Immigration Support Services (SRV 7l); Legal Assistance (SRV 7m); and Mediation/Customer Advocacy (SRV 7o) which undermines CAAs' ability to tell the	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
584	Denise L. Harlow	National Community Action Partnership (NCAP)	The consolidation of services can help streamline reporting, but it must be balanced to ensure that the Network can clearly articulate its interventions and strategies to create change. The CSBG Annual Report acts as a menu of options for reporting common services and requires flexibility to allow locally driven agencies to report on the diverse and adaptable services and strategies deployed to meet local needs. Eliminating key services does not necessarily reduce the burden and may decrease the report's quality and its alignment with CSBG's statutory purpose.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
585	Denise L. Harlow	National Community Action Partnership (NCAP)	Identification of Services as Concrete Supports with No Performance IndicatorsIn CSBG Annual Report 3.0, OCS introduces the concept that approximately fourteen services included in Module 3, Section A are "Concrete Supports." In the Service to Outcome Plan, OCS added a new concept that a service identified as a concrete support that "does not require a performance indicator as it is a tangible service to support economic mobility." This change is an important recognition that addressing material hardship, supplementing income and/or public benefits is critical, but often alone does not contribute to a measurable outcome. More often	Alternative Response	OCS acknowledges this comment. Concrete supports have traditionally been in the report but have not had a clear delineation into how they may be counted See AR 2.0 SRV 2k, SRV 2aa, SRV 2bb, SRV 3g, SRV 3m, SRV 3n, SRV 3p, SRV 3q, SRV 4c, SRV 4d, SRV 4e, SRV 4j, SRV 4k, SRV 5ii, SRV 5jj, SRV 5nn). Research in human and social services highlights the outcome of providing concrete supports lead to a better quality of life because basic needs are met. The proposed changes aim to highlight what is a concrete support to demonstrate that much of the work of Community Action is
586	Denise L. Harlow	National Community Action Partnership (NCAP)	NCAP has several recommendations related to the addition of concrete supports: Refine the language in the Service to Outcome Plan to more clearly demonstrate that concrete economic supports are not only tangible services to support economic mobility, but also economic stability or security. For senior populations or persons with disabilities many of the types of services identified by OCS as concrete supports are delivered to supplement public benefits, reduce material hardship, and maintain stability or security. We believe it is important to reflect both economic mobility and economic stability/security in this new concrete	Alternative Response	OCS appreciates this feedback. The service to outcome is a supplemental document to understand the changes, but are not reflective of final guidance. As noted in the DCL, following OMB approval, OCS will release guidance on the services and outcomes for the purposes of the federal reporting requirement.
587	Denise L. Harlow	National Community Action Partnership (NCAP)	NCAP has several recommendations related to the addition of concrete supports: Three services in the Service to Outcomes plan are not identified as concrete supports or having a performance indicator. Services 3c and 5j should be identified as concrete supports. See above for recommendations on Service 2r.	Alternative Response	OCS acknowledges this comment and notes the services listed are not tangible therefore are not conrete supports but services that lead to measureable outcomes.
588	Denise L. Harlow	National Community Action Partnership (NCAP)	NCAP has several recommendations related to the addition of concrete supports: SRV 3b, the number of individuals that received business and entrepreneurial financial services, should not be connected to a concrete support. Many CAAs work in this space, and the outcome they target is individuals starting small businesses. Although the numbers for this outcome may be small, we believe the impact of these services is significant and should be captured in an actual performance measure rather than identification as a concrete support.	Request Change Accepted	OCS acknowledges and has incorporated this feedback. Outcome for SRV3b is FNPI 3c.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
589	Denise L. Harlow	National Community Action Partnership (NCAP)	Addition of Transportation Domain to CSBG Annual Report Version 3.0In CSBG Annual Report 3.0, OCS proposes adding a new Transportation domain to capture transportation services provided by CAAs. This addition elevates the recognition of the criticaltransportation work done by CAAs. However, challenges remain in capturing the full impact of these services as many CAAs do not collect demographic data on riders or cannotdeduplicate the people served, limiting the ability to report these services accurately in CSBG Annual Report Version 3.0 Module 3 (Individual & Family)...However, without the ability to deduplicate	Alternative Response	OCS acknowledges this comment and highlights the unit of measurement for the transportation domain is not an individual but the transportation unit so a voucher, buss pass, or ride.
590	Denise L. Harlow	National Community Action Partnership (NCAP)	Additionally, the current OCS guidelines limit CAA's ability to report community level transformation in the CSBG Annual Report only to new efforts; therefore, CAAs with existing broad transportation effortsstill will not be able to report their impacts. For instance, CAAs operating large-scale transportation systems provide critical services to thousands of individuals, facilitating access toemployment, education, healthcare, and other essential services...Consequently, the significant community-wide impact of these transportation services—such as improved communitymobility, economic development, and enhanced quality of life—goes	Alternative Response	OCS acknowledges and appreciates this feedback. During the first year post-OMB approval, the reporting structure will remain exactly the same and provide the federal office with time to update materials and work on a robust technical assistance plan to support states that have a wide array of data collection strategies. So during this time, we will begin working with our funded partners to update SmartForms, update database coding and validations for states that operate databases available at no cost, and release policy, guidance, and communications to support the
591	Denise L. Harlow	National Community Action Partnership (NCAP)	Elimination of Single Parent Female/Single Parent Male Designation in Household TypeIn CSBG Annual Report Version 3.0, OCS streamlined the Household Type section in Module 3,Section B, D – Household Characteristics, 9) Household Type, on page 41, removing thedifferentiation between single-parent female and male heads of household. These distinctions arecrucial for understanding who CAAs are serving and enable CAAs to make informed decisionsabout program policy. They provide insights into the demographic makeup of households served,essential for tailoring services to meet specific needs. Differentiating between single-	Request Change Not Accepted	OCS consolidated this due to the burden expressed by parsing this out by gender.
592	Denise L. Harlow	National Community Action Partnership (NCAP)	Elimination of Income Source in Household DemographicsOCS' CSBG Annual Report Version 3.0 Module 3 Section C eliminates the Sources ofHousehold Income datapoint found in CSBG Annual Report Version 2.1 Module 4 Section C:All Characteristics Report, D.13. This datapoint informs program development and evaluationand plays a pivotal role in debunking myths about the demographics of individuals and familiesassisted by CAAs. Given that this data is already collected for eligibility purposes, theelimination of this data point would not alleviate the reporting burden.NCAP recommends retaining the household income source data	Request Change Accepted	OCS acknowledges this comment and has restored Module 4 Section parts 13 and 14 for household income sources.
593	Denise L. Harlow	National Community Action Partnership (NCAP)	Elimination of Datasets that Cannot be UnduplicatedOCS' CSBG Annual Report Version 3.0 Module 3 Section C eliminates the ability to report datasets that cannot be unduplicated as found in CSBG Annual Report Version 2.1 Module 4 Section C E-F. While the removal may streamline reporting processes at the local level, there is a risk of underreporting the full impact of CAAs. Datasets that cannot be unduplicated often include segments of the population served by CAAs that cannot be integrated into agency reporting systems. These datasets often represent vulnerable populations or specialized services that require unique	Request Change Not Accepted	OCS acknowledges this comment and highlights that this information represents a portion of the burden that is underutilized for national reporting purposes. State and local agencies may opt to continue to collect this for there needs as the removal of the federal reporting requirement doesn't preclude and agency from continuing to collect it.
594	Denise L. Harlow	National Community Action Partnership (NCAP)	VII. ClarityClarity of Reporting and DefinitionsOCS has not provided sufficient instructions and guidance on how OCS interprets the data points and changes for the Network to fully respond to the proposed changes. Without clear implementation details and definitions of key terms, it is difficult for us to provide fully informed comments. The absence of instruction manuals to understand how OCS interprets data points and what they expect to be included or excluded creates uncertainty. We recommend that OCS work with the Network to develop reporting guidance and definitions. CAAs, who work with this data every day, are	Alternative Response	OCS acknowledges and appreciates this feedback. During the first year post-OMB approval, the reporting structure will remain exactly the same and provide the federal office with time to update materials and work on a robust technical assistance plan to support states that have a wide array of data collection strategies. So during this time, we will begin working with our funded partners to update SmartForms, update database coding and validations for states that operate databases available at no cost, and release policy, guidance, and communications to support the

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
595	Denise L. Harlow	National Community Action Partnership (NCAP)	CSBG Annual Report Version 3.0 Module 4 – Community Level TransformationIn the revised CSBG Annual Report 3.0, OCS continues to identify what is now Module 4, Community Level Transformation, as optional. This optional status, coupled with OCS's lack of recent feedback or reporting on community change efforts, has resulted in a significant gap in reflecting the true impact of these initiatives. For example, CAAs across the country are developing housing, addressing systemic racism, and creating jobs and yet these types of critical impacts are going unreported. We are especially concerned that the recent reports to Congress do	Request Change Not Accepted	OCS appreciates and values this feedback. The decision to keep the new Module 4 optional was in recognition for the need for state and local agencies to receive additional guidnace on capturing this work appropriately to measure outcomes. OCS reviewed submissions and our goal primarily is appropriately telling the story of community level work but in a way that presents sound data for national performance reporting.
596	Denise L. Harlow	National Community Action Partnership (NCAP)	Services to Outcome PlanIn CSBG Annual Report 3.0, OCS introduces a new Services to Outcome plan, aiming to perhaps create a direct link or mapping between services provided and the outcomes achieved. While this approach holds potential for more consistent alignment of services to outcomes across the nation, additional detailed guidance on the implementation of this plan is necessary before it can be fully considered. It is unclear whether reporting a service will be mandatory to report the associated outcome as proposed in the Services to Outcome plan. If OCS mandates that a service must be reported to claim an	Alternative Response	The service to outcome attachment was a supplemental document to help in understanding the rationale and organization of the report under the proposed revision.
597	Denise L. Harlow	National Community Action Partnership (NCAP)	Individual Characteristics Section RevisionOCS has stated they will be revising the demographics section to comply with recent updates to Statistical Policy Directive No. 15 (Directive No. 15) and better align demographics with census categories.33 However, this information has not been made available for review during the 60-day comment period. Demographics are a key element of the CSBG Annual Report, helping CAAs to tell the story of who is impacted by services, evaluate agency impact and reach, ensure there is no disproportionality in those served, and use data to make informed decisions. Detail related to the demographics that will be	Alternative Response	At the time of the 30-day comment period, OCS has updated the racial and ethnic categories to comport with the requirements from the Office of Management and Budget ,
598	Denise L. Harlow	National Community Action Partnership (NCAP)	VIII. Other Additions, Revisions, and ModificationsConsidering the proposed changes to the CSBG Annual Report, it is imperative to address the need for enhanced training, resources, and support for Network members to ensure successful implementation. OCS should allocate additional resources to support necessary updates to software systems, and training and technical assistance using providers fluent in the context and needs of the CSBG Network. Ensuring that CAAs have access to relevant, comprehensive, and ongoing training and resources will facilitate a smoother transition and minimize disruptions in service	Alternative Response	OCS acknowledges this comment and appreciate this feedback.
599	Denise L. Harlow	National Community Action Partnership (NCAP)	IX. ConclusionNCAP appreciates the opportunity to provide feedback on the proposed changes to the CSBGAnnual Report. We commend OCS for its commitment to reducing the reporting burden andenhancing the quality of data collected. However, we believe further refinement is necessary toensure alignment with the core purposes of the CSBG Act and the realities of the CommunityAction Network.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
600	Denise L. Harlow	National Community Action Partnership (NCAP)	We urge the Office of Community Services (OCS) to carefully consider the feedback,comments, and recommendations provided by NCAP, its member agencies, and otherstakeholders in the Community Action Network. We hope OCS will take the time to reviewall the comments and look for creative solutions to maintain continuity of reporting and not rushto complete a clearance process that is incomplete. Our joint mission calls for collaboration toalleviate poverty, revitalize communities, and empower people and families and we remaincommitted to working together with OCS and other stakeholders to ensure	Alternative Response	OCS acknowledges this comment and appreciate this feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
601	Denise L. Harlow	National Community Action Partnership (NCAP)	Given the significant concerns raised with the proposed CSBG Annual Report Version 3.0 and the lack of comprehensive engagement with the Network, we ask that OCS consider clearing CSBG Annual Report Version 2.1 at this time and engage with the Community Action Network prior to the clearance of Version 3.0 in order to allow for a collaborative process that genuinely reduces burden while preserving the quality and integrity of the report.Thank you for the opportunity to provide feedback on the proposed changes. Please feel free to contact us directly if we can provide any additional information or support during this process. We	No Change or Response Needed	No response required.
602	Allison Ma'luf	Community Action Program Legal Services (CAPLAW)	We commend the Office of Community Service's (OCS's) goal of reducing the burden on the Community Action network with the proposed changes in CSBG Annual Report 3.0 (Version 3.0). We appreciate the opportunity to provide feedback on those changes and share overarching and specific comments.	No Change or Response Needed	No response required.
603	Allison Ma'luf	Community Action Program Legal Services (CAPLAW)	While we appreciate the intent behind Version 3.0, we are disappointed and concerned by the lack of network-wide engagement in the development of the revisions, the brief time frame for responding to the revisions, and the lack of impactful change. For these reasons, which are discussed in greater detail in this section and those below that address specific Modules, we are requesting that OCS only move forward at this time with CSBG Annual Report 2.1 {Version 2.1) and make revisions to it as requested, while simultaneously beginning the process of involving stakeholders at the local, state and nationallevels in the development of	Alternative Response	On June 28, OCS released a Dear Colleague Letter announcing the processing for the final 30 days on Annual Report 2.1, the Tribal Annual Report, and Tribal Short Form while we continue to reconcile the comments submitted on Annual Report 3.0. Once all comments have been reconciled, ACF will prepare Annual Report 3.0 for final comment and OMB approval.
604	Allison Ma'luf	Community Action Program Legal Services (CAPLAW)	It is also unclear how Version 3.0 reduces the burden on the Community Action network and results in impactful change with respect to elevating CSBG outcomes. It is quite difficult to identify an accurate statement of burden as the statements on the title pages of both Version 2.1 and Version 3.0 are the same and neither reflect the information provided in the federal register notice. The title pages both indicate that the: Public reporting burden for this collection of information is estimated to average 198 hours per grantee and 697 hours per sub-grantee, including the time for reviewing instructions, gathering and maintaining the data	Alternative Response	OCS appreciates this feedback and notes the burden estimates will be updated with the 30-day comment version.
605	Allison Ma'luf	Community Action Program Legal Services (CAPLAW)	It is equally unclear as to what factors were considered in determining any of the statements, all of which vary quite greatly. The consolidation and removal of indicators will result, at least over the next three to five years, in increased efforts and expenditures to revamp systems at both the state and locallevels without any significant relief, as the remaining indicators are quite extensive. With Version 3.0,many indicators still exist but now are changed to an extent and degree that adapting to the changes will burden overly taxed and often understaffed state offices and eligible entities. Many in the Community Action network are still	Alternative Response	OCS acknowledges this comment and shares that during the two-year phased implementation, we will increase our training and technical assistance on these reporting structures and as we currently provide the coding for databases at no-cost, we will continue to so systems can be updated to reflect the collection of information. OCS also emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds
606	Allison Ma'luf	Community Action Program Legal Services (CAPLAW)	The deletion and revision of several sections of Module 1 in Version 3.0 will lead to less accountability in the Community Action network while unnecessarily bringing attention to eligible entities experiencing difficulties.	Alternative Response	OCS acknowledges this comment. The items in Module 1 that saw a change were largely repurposed and not removed from the way the federal office administers CSBG. For example a few of these elements are required by CSBG funded states and territories to be in the state plan. And the federal office will ascertain this information through grant administration with monthly contacts, quarterly calls, risk assessment, and monitoring when conducting routine activities.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
607	Allison Ma'luf	Community Action Program Legal Services (CAPLAW)	The removal of Section B in Version 3.0 will result in Congress receiving an incomplete and potentially inaccurate understanding of the CSBG framework. State CSBG offices play a critical role in the ability of eligible entities to assist individuals and families with low incomes in an effective and timely manner.Actions by state CSBG offices can, and have, hampered the ability of eligible entities to meet the goals and purposes of the federal CSBG Act. Two HHS monitoring reports of state CSBG offices, one from 2018 focused on Wyoming and another from 2024 focused on Florida, exemplify the need to hold a stateCSBG	Alternative Response	OCS appreciates this feedback. Assuming the comment is referencing Section B of Module 1, the revisions were not removed in the functions of the federal office, but is obtained in other engagement with grant recipients through program oversight, grant administration, and the state plan process.
608	Allison Ma'luf	Community Action Program Legal Services (CAPLAW)	Section C: CSBG Eligible Entity Update, C.1 in Version 2.1Section B: CSBG Eligible Entity Update, B.1. in Version 3.0In table B.l in Version 3.0, an option is added with no explanation. In the column "A change occurred during the reporting period (FFY)", the word "Added" is included as an option. "Added" is not a term or concept that is reflected in the CSBG Act. Since there is no clear basis for this change in the CSBG Act and no explanation provided, it is impossible to respond to it.We request that OCS remove the "Added" option from table B.1 if it moves forward with Version 3.0 since it is unclear what the revision is intended to reflect or address.	Alternative Response	OCS acknowledges this comment and notes the term 'Added' was included to provide greater flexibility for a state to note if a local agency was added within the performance period. Currently, states have to exercise a few more steps to note if an agency was brought on mid-year. This addition was to minimize burden for direct grant recipients in how they report the local agencies.
609	Allison Ma'luf	Community Action Program Legal Services (CAPLAW)	Section D. Organizational Standards for CSBG Eligible Entities in Version 2.1The elimination of Section D in Version 3.0 is concerning and does not seem to align with the statutory parameters that establish the current performance framework. In the 2016 Federal Appropriations Act, Congress directed OCS to ensure that state CSBG offices adopt federal agency performance standards issued by September 30, 2016. The CSBG Organizational Standards set forth in OCS Information Memorandum (IM) 138 were thus adopted by state CSBG offices at the direction of OCS pursuant to the Appropriations Act. As set forth in IM 138, "[t]he purpose of	Request Change Accepted	OCS acknowledges this comment and has restored a streamlined element to capture the meeting of organizational standards for eligible entities in Module 1.
610	Allison Ma'luf	Community Action Program Legal Services (CAPLAW)	Section E. State Use of CSBG Funds, E.7 in Version 2.1Section C. State Use of CSBG Funds, C.6 in Version 3.0To maintain accountability with respect to the use of state discretionary funds, the table associated with C.6 in Version 3.0 should continue to require a brief description of the services/activities provided with the funding. Furthermore, just as state CSBG offices report on carryover funds used by eligible entities(i.e., the 90%), states should also report on carryover funds that they use (i.e., the 10%). While a state CSBG office exercises broad authority relating to the use of the 10% discretionary funds, any use must still further the goals and	Request Change Accepted	OCS acknowledges this comment and has restored a narrative for state and territory agencies to provide a narrative when issuing discretionary funding.
611	Allison Ma'luf	Community Action Program Legal Services (CAPLAW)	Section D. State Training and Technical Assistance, D.1 in Version 3.0We appreciate OCS's focus on ensuring that the funds used by state CSBG offices for training and technical assistance (TIA) are meeting the needs of the Community Action network. However, the addition in Version 3.0 of the column "Evaluation Measures for TIA" in D.1 is confusing absent a specific explanation. The lack of information about this change makes responding to it in any substantive waydifficult. The two sections of the federal CSBG Act that specifically speak to TIA simply require that TIA either address eligible entity needs and improve program quality or help	Alternative Response	OCS appreciates this feedback. This addition was to enhance accountability to measure the outcomes of the TTA provided. The guides and instructions post-OMB approval will adopt the recommendation to expound further.
612	Allison Ma'luf	Community Action Program Legal Services (CAPLAW)	Section G. State Linkages and Communications, G.1, G.2, G.3 and G.S in Version 2.1Section E. State Linkages and Communications in Version 3.0It is unclear why OCS is removing G.1, G.2, G.3 and G.S from the 3.0 Revisions since those sections reflect critical actions state CSBG offices are required by the CSBG Act to ensure are occurring, see 42 U.S.C. § 9908(b). "Coordinating the use of a broad range of Federal, State, local, and other assistance" isalso one of the central tenets of the CSBG Act and is a critical role played by CAAs in their local communities. 42 U.S.C. § 9901(2)(A). CSBG funds are often the smallest source of funding an eligible entity	Request Change Not Accepted	OCS acknowledges this feedback and notes the reduction of the State Linkages section will be captured in other methods of how the federal office provides oversight and administers the grant while also ensuring the bruden is minimized where possible.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
613	Allison Ma'luf	Community Action Program Legal Services (CAPLAW)	Section H. Monitoring, Corrective Action, and Fiscal Controls, H.4 and H.S in Version 2.1Section F. Monitoring, Corrective Action, and Fiscal Controls, F.4 and F.S in Version 3.0To avoid mischaracterizations and federal overreach, OCS should remove H.4. and F.4 and not adopt the changes in Version 3.0 to F.S. Technical Assistance Plans (TAPs) are not a recognized tool for addressing monitoring findings under the federal CSBG Act. The only recognized tool is a Quality Improvement Plan(QIP). The CSBG Act creates a clear system for corrective action, see 42 U.S.C. § 9915. A state may determine that an eligible entity is not in	Alternative Response	OCS acknowledges this comment and revised this element to continue monitoring technical assistance from states to local agencies specific to non-compliance as a statutory requirement specific to technical assistance. OCS recognizes there are multiple tools available to states to work closely with local agencies for corrective action and is not requiring the use of any specific tools, but is asking for infomration from grant recipients that do use these tools so that we aware on any ongoing noncompliance issues. OCS is not asking states to name specific local agencies that have
614	Allison Ma'luf	Community Action Program Legal Services (CAPLAW)	Section H. Monitoring, Corrective Action, and Fiscal Controls, H.6 in Version 2.1Section F. Monitoring, Corrective Action, and Fiscal Controls, F.6 in Version 3.0The paraphrasing of the Uniform Guidance provision in the Note in H.6 and F.6 is incorrect.Furthermore, the Annual Report should reference HHS's codification of the Uniform Guidance (45 C.F.R. Part 75). Section 75.501 requires a single audit if a non-federal entity "expends," not "receives," $750,000 or more in federal awards during the non-federal entity's fiscal year. Also, the threshold will increase to $1,000,000 under the final version of the Uniform Guidance, effective October 1,	Request Change Accepted	OCS acknowledges this comment. This annual report was written prior to the change in the CFR. Annual Report 3.0 will note the updated citation. The single audit threshold will be removed as the written change requires OMB issue a rule and HHS issue department-wide policy. OCS will note a marked change once HHS issues the guidance.
615	Allison Ma'luf	Community Action Program Legal Services (CAPLAW)	Comments on Module 2: Eligible Entity Expenditures, Capacity and Resources and Module 3 (4 in Version 2.1): Individual and Family Level We are concerned that the revisions to these two Modules in Version 3.0 are overstepping directives in the CSBG Act that inform how eligible entities must use CSBG funds. These Modules are intended to reflect an eligible entity's use of CSBG funds as required by the CSBG Act. To receive CSBG funding from a state CSBG office, an eligible entity must submit a community action plan detailing how it will use CSBG funds to address the needs in its community and further the federal CSBG Act purposes	Alternative Response	OCS acknowledges this comment and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS
616	Charlaine Mazzei	Del Norte Senior Center, Inc.	Response to Community Services Block Grant (CSBG) Annual Progress Report, OMB #0970-0492 On behalf of the Del Norte Senior Center – Community Action Partnership of Del Norte (DNSC), I am writing to formally offer comment on the proposed changes to the Community Services Block Grant (CSBG) Annual Progress Report OMB #0970-0492. DNSC is a small agency in Del Norte County, California on the far northern coast of California, just south of the Oregon border. Although renowned for majestic Redwood forests and stunning coastlines, the area is also plagued by a high poverty rate and significant barriers to economic growth and	Alternative Response	On June 28, OCS released a Dear Colleague Letter announcing the processing for the final 30 days on Annual Report 2.1, the Tribal Annual Report, and Tribal Short Form while we continue to reconcile the comments submitted on Annual Report 3.0. Once all comments have been reconciled, ACF will prepare Annual Report 3.0 for final comment and OMB approval.
617	Charlaine Mazzei	Del Norte Senior Center, Inc.	DNSC appreciates the efforts to simplify the annual reporting process. Each agency will have to make an analysis of whether the reduction in reportable services and performance indicators will impair their ability to accurately report the impact they have in their communities. DNSC supports the idea that each agency should have sufficient opportunity to accurately report its programs, services and impact. To that end, DNSC supports the comments of other state administrating agencies, regional and state associations and local CSBG eligible entities. For DNSC, specific comments are as follows:	No Change or Response Needed	No response required.
618	Charlaine Mazzei	Del Norte Senior Center, Inc.	IS THE PROPOSED COLLECTION OF INFORMATION NECESSARY FOR THE PROPER PERFORMANCE MEASUREMENT OF FEDERAL, STATE OR LOCAL AGENCIES. DNSC agrees that collection of information on CSBG Eligible Entity performance is necessary to promote accountability for federal funds and to educate decision-makers on the necessity, impact and effectiveness of CSBG.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
619	Charlaine Mazzei	Del Norte Senior Center, Inc.	The primary question here is whether the information being collected in the proposed revision is the correct data to properly measure performance. Specific comments on the individual data elements will be addressed later in this letter; however, in general, OCS has shifted the FNPI's away from reporting outcomes to reporting process measures such as enrollments, engagements and other non-outcome metrics. In some cases, active participation in a service may be assumed to lead to a desired outcome, but in wherever possible, actual outcomes should be measured and reported.THE QUALITY OF INFORMATION COLLECTED. DNSC is	Request Change Accepted	OCS acknowledges this comment and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS
620	Charlaine Mazzei	Del Norte Senior Center, Inc.	DNSC is also concerned that the effort to artificially link services to specific individual outcomes as outlined in the Services to Outcomes plan will seriously degrade the quality of outcome data. While DNSC understands that OCS is attempting to assist agencies – or perhaps its own staff – connect services to outcomes, we strongly disagree with the resulting plan that pigeonholes services into single outcomes. The table shows that multiple services can support a single outcome, but in only two instances does the plan acknowledge that a single service can support more than one outcome.	Alternative Response	OCS appreciates this feedback and emphazies the federal office has a responsbility to nationally report out on the performance outcomes and the listing of services with the inclusion of outcomes without a connection can create incongruencies in how the story of CSBG is told at a national level. There is recognition that within the block grant structure with the incredible flexibility, there is no definitive method to capture all elements across the diverse service offerings in the country. There are elements built into the report to provide space for the flexibility such as the use of
621	Charlaine Mazzei	Del Norte Senior Center, Inc.	This attempt to overly simplify the impact of services appears to have resulted in a manipulation of outcomes to match services so that enrollment in a service becomes the outcome. It has also led to the characterization of some services as lacking in outcomes ("concrete supports"), when in fact, those services clearly support multiple outcomes, often in different domains.	Alternative Response	OCS acknowledges this comment and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS
622	Charlaine Mazzei	Del Norte Senior Center, Inc.	It appears that OCS may be trying to force a match between the number of individuals reported in Module 3, Section A, Services and the number of individuals reported in Module 3, Section B, Indicators. Perhaps this is an attempt to prevent the reporting of services without also reporting outcomes. Many of us have had to report in this way because of the unreasonable expectations for outcome documentation imposed by state monitors.OCS should understand that expecting an exact match between individuals served and the outcomes achieved is not realistic. Attempting to force such a match will lead to confusion, bad data,	Alternative Response	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job
623	Charlaine Mazzei	Del Norte Senior Center, Inc.	THE CLARITY OF THE INFORMATION TO BE COLLECTED. In general, DNSC finds the new report to be an improvement in clarity over the previous version. Specific suggestions for additional clarity are offered later in this letter.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
624	Charlaine Mazzei	Del Norte Senior Center, Inc.	DOES THE INFORMATION TO BE COLLECTED PRODUCE A SIGNIFICANT BURDEN? IF SO, HOW COULD THE BURDEN BE MINIMIZED ON RESPONDENTS, INCLUDING THROUGH THE USE OF AUTOMATED COLLECTION TECHNIQUES OR OTHER FORMS OF TECHNOLOGY? The information to be collected on the All Characteristics Report produces a significant burden because it is not possible to compile a completely unduplicated count of the number and demographics of individuals and families who are served by an entire Community Action Agency, its subrecipients and its significant partners.Each Community Action Agency operates an infinitely diverse	Alternative Response	OCS acknowledges this feedback and much of what is expressed demonstrates the clear need to reduce some of what is reported due to the burden.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
625	Charlaine Mazzei	Del Norte Senior Center, Inc.	THE ACCURACY OF THE AGENCY'S ESTIMATE OF THE BURDEN OF THE PROPOSED COLLECTION OF DATA. DNSC does not believe that OCS's estimate of the burden of the proposed data collection is accurate, especially with respect to the All Characteristics Report. OCS has failed to take into account the difficulties discussed above when agencies must use disparate data collection systems to operate their programs and these data collection systems cannot produce integrated data.With respect to the reporting burden related to services and performance indicators, DNSC does not anticipate as significant a reduction in the	Alternative Response	OCS utilized the burden estimate formula developed for the current annual report and adjusted it based on the reductions and kept in mind there would be initial increases in burden to account for the changes during the periods where there is an overlap of 2.1 and 3.0 reports in FY26 (3.0 is optional in FY26 before becoming mandatory in FY27) but that it would adjust over time. It should be noted that burden estimates are largely estimates and the federal office through an incremental implementation intends to provide expansive technical assistance and
626	Charlaine Mazzei	Del Norte Senior Center, Inc.	Costs will be incurred to make the changes proposed here. Those costs should not have to be borne by states and local agencies out of already tight CSBG allocations. OCS should present a plan for how these automation changes will be supported.	Alternative Response	OCS acknowledges this comment and shares that during the two-year phased implementation, we will increase our training and technical assistance on these reporting structures and as we currently provide the coding for databases at no-cost, we will continue to so systems can be updated to reflect the collection of information. OCS also emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds
627	Charlaine Mazzei	Del Norte Senior Center, Inc.	WHAT ADDITIONS, REVISIONS OR MODIFICATIONS TO THE INFORMATION COLLECTION IS SUGGESTED? Module 1 – State Administration DNSC does not have specific comments regarding changes to the State Administration portion of the proposed reporting format. DNSC asks OCS to work with states to insure that additional burdens are not imposed as the state collects reportable data from local agencies.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
628	Charlaine Mazzei	Del Norte Senior Center, Inc.	Module 2 – Eligible Entity Expenditures, Capacity and Resources Section A: CSBG Expenditures by CSBG Eligible Entity In general, OCS needs to gather more information and provide more clarity on how the change to reporting on a Federal Fiscal Year will impact states and local agencies who do not already report in this way. If OCS anticipates that state contracting and fund distribution will also follow the FFY, then DNSC does not support this change. The vagaries of the Federal budgeting and funds release processes are such that local agencies cannot rely on timely receipt of funds to support critical needs if contracts are based on a FFY. If,	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
629	Charlaine Mazzei	Del Norte Senior Center, Inc.	Report Field A.1. Separating out the types of CSBG expenditures into Allocation, Carryover and Discretionary has the potential to increase erroneous reporting. DNSC questions the value of this separation.	Alternative Response	OCS acknowledges this comment and after consideration and reviewing the comments, has removed this reporting element from the report as it may cause additional burden when considering accounting principles, terms, and definitions of how funds are allocated.
630	Charlaine Mazzei	Del Norte Senior Center, Inc.	Report Field A.2. DNSC disagrees with the removal of the option to report expenditures supporting multiple domains. Much of our CSBG funding supports first-line management, clerical, janitorial, and maintenance staff, building maintenance, utilities and other common costs. These expenditures support all of the activities of the agency and cannot be easily allocated to a specific domain.	Request Change Not Accepted	OCS acknowledges and appreciates this feedback. There are services in the current Services Supporting Multiple Domains (such as Child Care Subsidies/Payments, Day Centers, clothing assistance) that have been restructured into other domains. OCS reviewed the last five years worth of data submissions and technical requests and several of the services presented here were either underutilized or created a burden with capturing the correct unduplicated count. Therefore, OCS has removed them from the federal reporting requirement to minimize the collective

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
631	Charlaine Mazzei	Del Norte Senior Center, Inc.	Section B: CSBG Eligible Entity Capacity Building DNSC is aware that some agencies are not in favor of removing the agency staff certification section because it is seen as an opportunity to report on the professional-level capacity of their organizations. DNSC is in favor of removing that section as it is not relevant to the skill sets of our staff. It is one less set of data to report.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
632	Charlaine Mazzei	Del Norte Senior Center, Inc.	Report Field B.5. DNSC questions the utility of this section. While it may be desirable to show that CSBG Eligible Entities are actively entering into partnerships, counting or categorizing those partnerships is not a focus of our work.	Alternative Response	OCS acknowledges this comment and highlights these are specific to the organizational standards for local agencies and demonstrates the way partnerships help with the leveraging of resources to meet the goals of CSBG.
633	Charlaine Mazzei	Del Norte Senior Center, Inc.	Section C: Allocated Resources per CSBG Eligible Entity DNSC recommends replacing the word “Allocated” with the word “Expended”. It is not accurate to try to report funds that may have been allocated to an agency, but not expended within any reporting period. I believe there is a lack of clarity and some agencies may be trying to account for their entire contracted available funding amounts, while others are only reporting what was actually spent in support of services and outcomes. There is no utility in reporting unspent funds that may have been available during the reporting period. Reporting on available but unspent funds	Alternative Response	OCS acknowledges this comment and after consideration and reviewing the comments, has removed this reporting element from the report as it may cause additional burden when considering accounting principles, terms, and definitions of how funds are allocated.
634	Charlaine Mazzei	Del Norte Senior Center, Inc.	Module 3, Individual and Family Level DNSC supports the reorganization of the reporting format to put Individual and Family Services as Module 3; however, the impact on automated systems that may need reconfiguration because of this change should be taken into consideration.	Alternative Response	OCS appreciates this feedback.
635	Charlaine Mazzei	Del Norte Senior Center, Inc.	In general, DNSC would like to see sections added to the services module that would allow for units other than individuals served to be reported. In many cases, service volume is a more compelling and accurate reflection of the impact an entity has on its community. Some examples of service units that could be included are meals served, pounds of food distributed, number of food boxes distributed, number of hygiene services provided, etc. Reporting used to be allowed for these types of service units in previous versions of the annual report but were removed with the current version. We would like to see them returned.	Alternative Response	OCS appreciates this feedback and notes the reported was updated in this propsoed revision to provide a diverse unit of measurement in instances where it needs to be something other than an individual.
636	Charlaine Mazzei	Del Norte Senior Center, Inc.	Section A: Individual and Family Services DNSC would like to see Case Management returned as a service, potentially under Domain 5. This is a critical function that provides holistic services to individuals who need to access multiple supports in order to achieve stability. Outcomes for Case Management can be reported within the FNPI that corresponds to each service in which the client participated.	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
637	Charlaine Mazzei	Del Norte Senior Center, Inc.	Domain 1: Employment Services No suggestions.	No Change or Response Needed	No response required.
638	Charlaine Mazzei	Del Norte Senior Center, Inc.	Domain 2: Education, Childcare and Youth Development Services No suggestions.	No Change or Response Needed	No response required.
639	Charlaine Mazzei	Del Norte Senior Center, Inc.	Domain 3: Income and Asset Building Services SRV 3d. Should be removed. Transportation has been created as a separate domain. In addition, tracking the purposes for which transportation is being provided is often not possible, as will be discussed more fully in comments on the Transportation domain.	Request Change Accepted	OCS acknowledges this comment and has removed this indicator.
640	Charlaine Mazzei	Del Norte Senior Center, Inc.	Domain 4: Housing Services SRV 4a. Remove the word “emergency” from the parenthetical description. Agencies who operate ongoing housing subsidy services should be clear that they can report ongoing rental payments in this section.	Request Change Accepted	OCS acknowledes this comment and has removed the word "emergency".
641	Charlaine Mazzei	Del Norte Senior Center, Inc.	SRV 4b. Same as above. Remove the word “emergency”.	Request Change Accepted	OCS acknowledes this comment and has removed the word "emergency".
642	Charlaine Mazzei	Del Norte Senior Center, Inc.	Domain 5: Health and Nutrition Services Parenting classes, currently in Module 4, Section B, SRV 5mm, need to be reinstated. This is an important service in preventing intergenerational trauma and poor educational outcomes.	Request Change Not Accepted	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
643	Charlaine Mazzei	Del Norte Senior Center, Inc.	SRV 5d. Remove the qualifier (age 65+) from the definition of services. Programs serving “seniors” have different age eligibility standards that often include those younger than 65. Older Americans Act defines eligibility for senior services as 60+. HUD defines senior housing eligibility as 62+. Agencies need to be able to report all participants that were served according to the guidelines of the specific program(s) being operated. Suggest replacing the current description with the term, “older adults” as is used in SRV 5i.	Request Change Accepted	OCS acknowledges this comment and has updated the SRV. Please note that following OMB approval, OCS will issue supplemental guidance that provides qualifiers in some instances where it is pertinent for national reporting.
644	Charlaine Mazzei	Del Norte Senior Center, Inc.	SRV 5j. Same as above. Remove the qualifier (age 65+) from the definition of services.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain).
645	Charlaine Mazzei	Del Norte Senior Center, Inc.	Domain 6: Civic Engagement and Community Involvement Services DNSC would like to see a service entitled, “The number of individuals participating in community engagement and organizing training.”	Request Change Not Accepted	OCS acknowledges this comment but notes two concerns with this suggestion, it creates a double barreled indicator with the introudction of two services in one. The term community engagement is also very broad and can mean a wide array of things across the nearly 1,000 local agencies. OCS recommends the local agencies providing services within this domain utilize the 'Other' category and specify the unique service offerings not easily applicable to those prescribed.
646	Charlaine Mazzei	Del Norte Senior Center, Inc.	SRV 6c. Self-sufficiency services are not civic engagement activities. This service is more appropriately place in Domain 3: Income and Asset Building.	Alternative Response	OCS acknowledges this comment annd removed this in its entirety as the recommendation illuminated the services captured in Income and Asset Building capture self-sufficiency models.
647	Charlaine Mazzei	Del Norte Senior Center, Inc.	Domain 7: Transportation Services DNSC supports separately tracking the types of transportation support being distributed, but recommends removing SRV 7c. and SRV 7d. Trying to determine the specific use a low-income person makes of transportation support is not always possible. If an agency gives a participant a monthly bus pass, that single support could be used for multiple purposes, including going to school or job training, work, medical appointments, shopping or to access other services.	Request Change Not Accepted	OCS acknowledges this comment and notes the introduction of medical transportation is geared towards those that offer transportation services for medical appointments. Considering the social determinants of health and how increased access to health services can be addressed through access, OCS creates the delineation to adequately capture the service delivery reported by many of the local agencies under the Other category.
648	Charlaine Mazzei	Del Norte Senior Center, Inc.	Section B: Individual and Family NPIs General Comment: DNSC strongly recommends that all domains retain the ability to add “Other” outcomes to the report. This is currently available and clearly had efficacy in informing OCS of potential outcomes that needed to be added to reporting.	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an ‘other’ with requirement of description.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
649	Charlaine Mazzei	Del Norte Senior Center, Inc.	General Comment: All FNPI's should clearly specify (or it should be stated in instructions) that the reported outcomes are for participants who are served by Community Action, whether through direct services, subcontracts or significant partnerships. As currently written, the FNPI's could be interpreted to require data on all members of a service territory, whether or not they are participants in Community Action programs. This is not feasible, is beyond the scope of local agencies to accomplish, and could damage credibility if Community Action is seen to be trying to take credit for outcomes in which it had little to no actual influence.	Alternative Response	OCS acknowledges this comment and feedback. Hollistically speaking, the modules referenced are for all eligible entities which includes CAAs. OCS provide funding to more than CAAs (e.g., seasonal migrant farmworkers, limited purpose agencies, tribal organizations, etc.) so this list is inclusive of all the subrecipients. OCS will provide additional guidance post-OMB approval to specify units of measurement.
650	Charlaine Mazzei	Del Norte Senior Center, Inc.	General Comment: Please remove the Target and Performance Target Accuracy columns. Estimating performance at the beginning of a reporting period is challenging at best. Requiring individual agency estimated targets and explanations when those targets are not met or are exceeded does not add value to federal reporting that rolls up nationwide data. These fields simply add to the reporting burden and provide areas in which agency, state and federal staff must follow-up when questions arise.	Alternative Response	OCS acknowledges this comment and will continue examining the validity balanced with the burden of including these comments as they serve a purpose in setting national performance results targets, but may provide some challenges for local agencies.
651	Charlaine Mazzei	Del Norte Senior Center, Inc.	General Comment: Please remove the benchmarking from prior years to current year reporting. Again, service levels and needs change regularly and requiring individual agency explanations when these shifts occur does not add value to aggregated federal reporting.	Alternative Response	OCS acknowledges this comment and aims to continue working through it's funded TTA providers (NASCSP) who recommend these validations in the tools used.
652	Charlaine Mazzei	Del Norte Senior Center, Inc.	General Comment: For FNPI's that report intangible outcomes, such as increased wellness, OCS must be very clear with states that monitoring reported achievements should not require agencies to produce preand post-tests, surveys or other research-like documentation when the programs in use are already nationally recognized as evidence-based best practices. For example, national-level research has clearly shown that home visiting services increase senior well-being and ability to remain independently in their own homes. Likewise, it is nationally recognized that access to primary medical care improves long-term	Alternative Response	OCS acknowledges this comment and has made all efforts to so a connection between services and outcomes in light of the challenge to define a pre and pst test to definitively report outcomes long term. Conversely, OCS has leveraged academic research and evidence-based models to show the rationale behind many of the revisions, reductions, and additions to the collection instrument.
653	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 1: Employment While DNSC agrees with simplifying the FNPI's in this section to remove reporting of different time frames, we disagree with deletion of all FNPI's that report attained and maintained employment. Reporting only skills acquisition is insufficient. In addition, FNPI 1c. is awkwardly written and difficult to track. DNSC respectfully requests that the FNPI's for this domain be as follows:	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
654	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 1a. Remains as written.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
655	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 1b. Remains as written.	Alternative Response	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
656	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 1c. Add: Number of unemployed youth who obtained and maintained employment during the reporting period.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
657	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 1d. Add: Number of unemployed adults who obtained and maintained employment during the reporting period.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
658	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 1e. Add: Number of employed individuals who maintained employment during the reporting period.	Alternative Response	OCS acknowledges this comment and updated language to ensure the attainment of employment is captured.
659	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 1f. Rewrite: Number of employed individuals who increased wage or salary income from employment during the reporting period.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain).
660	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 2: Education and Youth Development Indicators Enrollment in and connection to programs are not outcomes. Several proposed FNPI's need to be rewritten to show achievement of an outcome. Numbers of individuals enrolled are reported in column I.) number of individuals served. DNSC respectfully requests that the FNPI's for this domain be as follows:	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
661	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 2a. Rewrite: Number of children age 0 to 5 served who achieve age-appropriate school readiness benchmarks. (Number of children enrolled in early childhood programs is reported in column I.)	Request Change Not Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain).
662	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 2b. Rewrite: Number of youth served who achieved grade-level academic benchmarks. (Number of youth connected to education is reported in column I.)	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
663	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 2c. Remains as written.	Request Change Not Accepted	OCS acknowledges this comment and notes the rewrite was done to address validity and consider burden.
664	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 2d. Remains as written.	Request Change Not Accepted	OCS updated the language to reduce duplication and burden for other federal funds. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency (subrecipient), state, tribe, or territory (grant recipient) from collecting the information for their specific needs.
665	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 2e. Delete: Enrollment in a program is not an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
666	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 2f. Remains as written. (Number of individuals enrolled in post-secondary education is reported in column I.)	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
667	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 3: Income and Asset Building Indicators Completion of training and opening accounts are not outcomes. As stated above, the number of individuals enrolled in services is reported in column I.). DNSC respectfully requests that the FNPI's for this domain be as follows:	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
668	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 3a Rewrite: Number of individuals served by Community Action income and asset building training who achieve and maintain financial stability during the reporting period. (Number enrolled is reported in column I.)	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
669	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 3b Rewrite: The number of individuals served by Community Action who open and maintain contributions to a savings or individual development account during the reporting period. (Those who only open an account, but do not maintain contributions would be reported in column I.)	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
670	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 3c. Remains as written; however, is a home the only asset that should be reported?	Request Change Not Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
671	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 4: Housing Indicators While DNSC agrees with simplifying the FNPI's in this section to remove reporting of different time frames, we disagree with deletion of all FNPI's that report non-emergency housing and housing retention outcomes. Reporting only emergency or short-term outcomes is insufficient.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
672	Charlaine Mazzei	Del Norte Senior Center, Inc.	In addition, FNPI 4e is awkwardly written, FNPI 4f mixes outcome types and FNPI 4g could be combined with a rewritten FNPI 4e. DNSC respectfully requests that the FNPI's for this domain be as follows:FNPI 4a. Remains as written.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
673	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 4b. Rewrite: The number of individuals who obtained and/or maintained safe and affordable housing.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
674	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 4c. Remains as written.	Request Change Not Accepted	OCS acknowledges this comment, but the content remains as revised with directional language to capture the true measure of the outcome for housing.
675	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 4d. Remains as written.	Request Change Not Accepted	OCS acknowledges this comment, but the content remains as revised with directional language to capture the true measure of the outcome for housing.
676	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 4e. Rewrite: The number of individuals who experienced improved health, safety and energy efficiency due to weatherization, lead and radon abatement; reduction in fire and electrical hazards; installation of grab bars and wheelchair ramps; home heating and water heating repair/replacement and other improvements to their homes.	Alternative Response	OCS acknowledges this comment and notes the inclusion of these examples without noting it's example may provide the pereception that this is an exhaustive list. We provide example language and commit to additional guidance post-approval, but declines to add this list recognizing the diversity of services provided at the local level.
677	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 4f. Rewrite: Number of individuals served by Community Action who experienced reduced utility costs, established utility service and/or avoided utility disconnection.	Alternative Response	OCS acknowledges this comment and notes the inclusion of these examples without noting it's example may provide the pereception that this is an exhaustive list. We provide example language and commit to additional guidance post-approval, but declines to add this list recognizing the diversity of services provided at the local level.
678	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 4g. Remains as written if there is a purpose to separating out water safety from FNPI 4e.	Request Change Accepted	OCS acknowledges this comment and appreciates this feedback. The FNPI that corresponds to weatherization has been updated to align with improved health and safety due to home improvements.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
679	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 4h. Added if there is a purpose to separately reporting water and wastewater outcomes: Number of individuals served by Community Action who experienced reduced water/wastewater costs, established water/wastewater service and/or avoided water/wastewater service disconnection.	Alternative Response	OCS acknowledges this comment and has updated the indicator to note directional language for outcome (i.e.: increase or decrease. OCS declines to change the subject to Community Action as not all subrecipients are CAAs.
680	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 5: Health and Nutrition Indicators DNSC has long advocated for the recognition that evidence based best practices in the health and nutrition domain should allow participation and receipt of services to be used as proxy indicators of improved outcomes. DNSC stopped reporting outcomes in this domain because state monitors insisted that individual participants have survey, pre- and post-service evaluations or other documentation of outcomes that were too burdensome to collect. If it is clearly communicated that for evidence-based services do not need to be documented in this way, the FNPI's could be written in a	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
681	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 5a. Rewrite: Number of individuals served by Community Action who improve health by receiving immunizations, blood pressure checks, bone density screenings, cancer screenings, prenatal and reproductive health care, and other preventive health care. (For this FNPI, all participants who receive the service are assumed to achieve the outcome without further documentation.)	Alternative Response	OCS acknowledges this comment and notes the inclusion of these examples without noting it's example may provide the pereception that this is an exhaustive list. We provide example language and commit to additional guidance post-approval, but declines to add this list recognizing the diversity of services provided at the local level.
682	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 5b. Add: Number of individuals served by Community Action who improve health by achieving and/or maintaining access to a primary health care provider.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
683	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 5bc. Rewrite: Number of individuals served by Community Action who are enrolled in and/or sustain enrollment in health care coverage during the reporting period. (Access to health care coverage is not an outcome unless the individual is actually enrolled.)	Alternative Response	OCS acknowledges this comment and has updated the indicator to note directional language for outcome (i.e.: increase or decrease). OCS declines to change the subject to Community Action as not all subrecipients are CAAs.
684	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 5cd. Is there a reason that this is reported separately from other health care service outcomes?	Alternative Response	OCS acknowledges this comment. The term reproductive was included to capture the current services that include maternal child health to cover the full spectrum of services offered.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
685	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 5de. Rewrite: Number of individuals who improved wellness through participation in wellness services such as exercise, meditation, stress reduction, healthy aging, nutrition education and similar wellness classes and activities. (For this FNPI, all participants are assumed to achieve the outcome without further documentation.)	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
686	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 5ef. Rewrite to remove (age 65+) due to differing age eligibility among senior service programs: The number of older adults who improve their independence by receiving home visiting services. (For this FNPI, receiving the service is an evidence-based gateway to the desired outcome. All participants are assumed to achieve the outcome without further documentation.)	Alternative Response	OCS acknowledges this comment and added an age qualifier due to increased request to utilize uniformed defintion. This support uniformity for national reporting. In instances where there are those under 65 receiving home visiting, subrecipients are encourages to use other where necessary.
687	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 5fg. Rewrite: Number of individuals served by Community Action who achieve and/or maintain access to and participation in supportive mental, behavioral and substance abuse health counseling and/or therapeutic services.	Alternative Response	OCS acknowledges this comment and has updated the indicator to note directional language for outcome (i.e.: increase or decrease). OCS declines to change the subject to Community Action as not all subrecipients are CAAs.
688	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 5gh. Rewrite: Number of adults who achieve and/or maintain access to and participation in oral health services.	Request Change Accepted	OCS revised this language to target the improvement of oral health in both adults and youth.
689	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 5hi. Rewrite: Number of children who achieve and/or maintain access to and participation in oral health services.	Request Change Accepted	OCS revised this language to target the improvement of oral health in both adults and youth.
690	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 5ij. Rewrite: Number of individuals served by Community Action who have improved food security through access to healthy food. (For this FNPI receipt of the service is the evidence-based outcome. All recipients are assumed to achieve the outcome without further need for documentation.)	Alternative Response	OCS acknowledges this comment and has updated the indicator to note directional language for outcome (i.e.: increase or decrease). OCS declines to change the subject to Community Action as not all subrecipients are CAAs. And the verb used is increased access rather than improve.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
691	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 6: Civic Engagement and Community Involvement IndicatorsDNSC does not have comments in this area.	No Change or Response Needed	No response required.
692	Charlaine Mazzei	Del Norte Senior Center, Inc.	FNPI 7: Services Supporting Multiple Domains Indicators DNSC fully supports the removal of this FNPI as it was confusing and often resulted in reporting that duplicated counts already being reported in other individual domains. That being said, OCS must acknowledge that some services do, in fact, support multiple outcomes in multiple domains instead of trying to artificially link services to single outcomes.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
693	Charlaine Mazzei	Del Norte Senior Center, Inc.	Section BC: All Characteristics Report Please see earlier comments under the question of whether data collection creates a significant burden for details regarding the challenges of trying to complete a single report of unduplicated demographics from disparate sources of data.	Alternative Response	OCS acknowledges this comment and significantly reduced the data by removing over 10 data points collected in the All Characteristics Report recognizing this ongoing challenge.
694	Charlaine Mazzei	Del Norte Senior Center, Inc.	Subsection E in the current reporting appears to have been removed. While DNSC supports the removal of this section as confusing and duplicative, it did provide the opportunity to count program participants who were not otherwise included in the All Characteristics report. How will OCS provide the opportunity for that to occur?	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
695	Charlaine Mazzei	Del Norte Senior Center, Inc.	Module 4, Community Level Module 4, as currently structured, does not provide agencies with a meaningful or easily completed format for reporting the community-level work in which we all participate. The module expects intensive reporting on a single project, when the work that most of us do is ongoing participation in multiple community-level collaboratives that may not have discreet outcomes. Many of us who do community-level work choose not to report it because of the complexity and restrictions of Module 4. DNSC encourages OCS to work with the Community Action network to better understand how we approach	Alternative Response	OCS acknowledges this comment and will continue updating the final appearance and tool used to collect Community Level Transformation to be more intuitive, dynamic, and user friendly. Please note for the process of OMB clearance, this will appear as it currently does while we work with our TTA providers and contractors to update.
696	Charlaine Mazzei	Del Norte Senior Center, Inc.	DNSC would again like to express appreciation for the opportunity to comment on the proposed CSBG Annual Report. Further engagement with CSBG Eligible Entities would achieve even better results than the truncated comment period currently allowed. We look forward to participating in such efforts.	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
697	Jennifer Smith	KCEOC Community Action Partnership, Inc.	Costs: Changes in the reporting system will not only increase costs to the agency, but will also take away precious time needed to be working with our families in need.	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Therefore, the first mandatory year for the updated reporting is not until the FY2026 CSBG Annual Report is due which is March 31, 2027. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update to Smart Forms, and increase technical assistance. The report will be on March 31 of each year. All of the contracts
698	Jennifer Smith	KCEOC Community Action Partnership, Inc.	Numbering Changes of Modules: As difficult as it was to learn the different module numbers of the reports, changing those numbers now will be very confusing to staff and will once again create a learning curve that will take up even more time to relearn.	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
699	Jennifer Smith	KCEOC Community Action Partnership, Inc.	Outputs v /s Outcomes: As a ROMA trainer for the last 12 years, I have been taught and am dedicated to showing the outcomes and changes we make in the lives of those we are serving. Seeing the language changed to capture services or "outputs" is very disappointing. Even with other funders we work with, such as the Department of Housing and Urban Development (HUD), they focus on outcomes. For instance, they do not focus on how many homeless individuals we enroll (output) in our program. They want to know how many were permanently housed (outcome), how many become employed (outcome), how many increased their	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
700	Jennifer Smith	KCEOC Community Action Partnership, Inc.	Demographics: It is critical that Single Parent Females and Single Parent Males be left in ·as part of the All Characteristics Report. Last year alone, these populations made up almost 20% of the household types served by KCEOC. In addition, the single parents (both male and female) make up almost 100% of the household composition of individuals with children served by the agency's homeless shelter and youth homeless crisis center. In fact, between 83% and □W% of all homeless families are headed by single mothers.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
701	Jennifer Smith	KCEOC Community Action Partnership, Inc.	Income sources are yet another item that is critical to collect on those being served. Not only does it provide data for prospective grants (as does household type), but it also provides a way to show a breakdown of who is being served (e.g., disabled households, veterans, working families). Showing different income sources in the system can also assist the case manager's work with clients by helping them achieve their financial goals; understanding the different income sources is crucial for effective financial planning and budgeting, which can lead to self-sufficiency.	Request Change Accepted	OCS acknowledges this comment and has restored Module 4 Section parts 13 and 14 for household income sources.
702	Jennifer Smith	KCEOC Community Action Partnership, Inc.	Employment- Please do not remove unemployed adults who obtained employed as a FNPI; this is critical to show as an outcome. KCEOC does not want to be viewed as a "hand out" organization and we have worked for almost 60 years to show that our purpose is to bring people out of poverty through employment, housing, early childhood education, and many other vital programs. Obtaining employment should also include more services to explain how employment was obtained, such as job readiness training, resume development, and interview skills-training.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
703	Jennifer Smith	KCEOC Community Action Partnership, Inc.	come and Asset Building Services- Please move SRV 3d the number of individuals receiving transportation services supporting income and asset building to Domain 7 transportation.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
704	Jennifer Smith	KCEOC Community Action Partnership, Inc.	Also, there are no services to match the new NPI 3b- the number of individuals who opened a savings accom1t or IDA or NPI 3c. the number of individual's who purchased a home. In our e□perience, there are always services to back up meeting a NPI	Request Change Not Accepted	SRV3a (The number of individuals who received training and counseling services for income management and asset building (e.g.: VITA, tax preparation services, credit repair, financial literacy, financial management, budgeting, homebuying, foreclosure avoidance)) can lead to FNPI 3b (The number of individuals who opened a savings account or IDA).
705	Jennifer Smith	KCEOC Community Action Partnership, Inc.	Also, for 3a, please take out that clients are completing training; this is an ·output. Again, we need to ·focus -on outcomes .and what change took place in the·Uves of the client. Going to a :training is great, but what was accomplished as a result? Did the individual get a job? What is. the ultimate outcome that is trying to be reached?	Alternative Response	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
706	Jennifer Smith	KCEOC Community Action Partnership, Inc.	Housing- SRV 4g the number of households receiving Weatherization services does not align with FNPI 4f number of individuals served with energy assistance and/or energy efficiency homes. It is not clear here-if this i·s still a Weatherization service or if the agency is to rnunt LIHEAP too. For fNPI 4g, is ·this referencing l:.IWAP? Is it a:nticipated that LIWAP is returning? Plus, individuals "served" is also an output, not an outcome ..	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
707	Jennifer Smith	KCEOC Community Action Partnership, Inc.	Multiple .Domains- Please do not remove case management, referrals, and eligibility determinations. All of these are critical to our homeless and other services. We are serving hundreds of client in extensive case management services and we need to keep up with who is in case management arid what services they are receiving. We are very serious about helphg people mow□ np the ladder from in crisis to stable to secure to even further.	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
708	Jennifer Smith	KCEOC Community Action Partnership, Inc.	Education- Please take out the words ''enruil" and "connected" in 2a, 2b, and 2e; these turn outcomes in to outputs and does not. give a true picture of accomplishments/differences made in the lives in those we are serving.	Alternative Response	OCS acknowledges and has incorporated this feedback. Outcome for SRV3b is FNPI 3c.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
709	Jennifer Smith	KCEOC Community Action Partnership, Inc.	Health- Sb, Sc, Sd, Se, Sg, Sh, Si are all outputs; this is revealing through the words "a□cess" and "receiving." There are no actaal outcomes and these are NPis. NPis shou.ld always be outcome focused. Also, Sf has been removed, which leaves the agency no way to report outcomes for our senior services, including our Service Coordinator program we have had since 2005. It provides services that allow seniors to age in place and avoid being institutionalized.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
710	Karli Schmelzer	Northeast Iowa Community Action Corporation	Consideration for the level of underreporting that occurs due to requirements for reporting unduplicated counts across the report.	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical
711	Karli Schmelzer	Northeast Iowa Community Action Corporation	If unduplicated counts are required, is there an understanding of the Public Transit provider systems across the nation and their ability to report unduplicated counts? If Transit providers cannot report unduplicated counts without heavy burden, this section will likely not be utilized if unduplicated counts are required. CAA transportation services that do not collect information on riders to where they can deduplicate the people served will not be able to report their efforts within this domain in Module 3 (Individual & Family). CAAs who operate existing transportation (like us at NEICAC) will also not be able to report their efforts to	Alternative Response	OCS acknowledges this comment and notes the unit of measurement for transportation is not the rider for the transportation unit itself which should be captured in general inventory. So this would include number of vouchers, cards, or rides, but not people.
712	Karli Schmelzer	Northeast Iowa Community Action Corporation	We are in support of the addition of concrete supports and truly believe that many of the services we provide are about stabilization to support individuals and families. Programs which provide case management or ongoing individual and family support services rely on the concrete supports provided by Community Action Agencies to offer short-term stability for individuals and families while they are navigating goal setting and developing a plan for long-term success. The direct assistance provided through concrete supports are a necessary building block in working towards positive outcomes.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
713	Karli Schmelzer	Northeast Iowa Community Action Corporation	Receipt of service is less burdensome to measure as opposed to outcomes and impact, which often require follow up and specific measurement. Programs maintain their own set of required measurements for tracking outcomes that do not always align with the annual report indicators, and we feel strongly that we can support the effectiveness of programs and services we offer when asked to do so.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
714	Karli Schmelzer	Northeast Iowa Community Action Corporation	Any time multiple services that are currently reported separately are combined into one, there is a significant chance that numbers reported are going to be fewer, and as a result it will appear that CAAs are providing fewer services. For example, under Housing Services we currently report emergency shelter, permanent housing placements, rent, deposit, mortgage, utility, utility deposits, utility arrears payments, and Weatherization. If rent and deposits are combined into SRV 4a. and we provided both a deposit and a rent payment for a customer within the same report period, this will only be reported as 1 due to the	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
715	Abby Hanks	Virginia Community Action Partnersh	Shift to Federal Fiscal Year: In the CSBG Annual Report v. 3.0., OCS proposed that all modules would be reported on using the Federal Fiscal Year (October 1 to September 30). Currently, we grant funds using the state fiscal year and our reporting is collected using the state fiscal year. As a state office we would need to modify contract dates and make significant changes to our state database systems to accommodate this shift. For our eligible entities, this would require time-consuming and costly work to update systems, processes, and records. It also disrupts financial comparability, making comparing previous fiscal years' financial	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical
716	Abby Hanks	Virginia Community Action Partnersh	Shift from outcomes to outputs: Our network has prioritized the impacts of outcomes over the last several years. The ability to show how an agency can impact a client through outcomes is a powerful storytelling tool. Many of the new FNPIs are focused on outputs rather than outcomes. Several of the NPIs are similar to the services, rather than a result of the services. We have concern regarding how the network will be able to continue to show the impact of the great work being done in their communities with the loss of outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
717	Abby Hanks	Virginia Community Action Partnersh	Services across multiple domains: In Virginia we are prioritizing the whole family concept. The proposed changes to eliminate many services in category 7 (specifically: FNPI 7a, SRV 7a, SRV 7b, and SRV 7c) would negatively impact the ability of our agencies to show the specific impacts through the whole family work being done in Virginia.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
718	Abby Hanks	Virginia Community Action Partnersh	Significant changes to services and outcomes: The elimination and combination of a vast majority of the services and outcomes will create the need for the state to completely overhaul the state database. This will come with a significant cost burden as well as a significant time burden for state staff. All training materials will need to be updated which includes many webinars and informational templates. Also, agencies with database systems will need to update their systems and training materials for agency staff.	Alternative Response	OCS acknowledges this comment and shares that during the two-year phased implementation, we will increase our training and technical assistance on these reporting structures and as we currently provide the coding for databases at no-cost, we will continue to so systems can be updated to reflect the collection of information. OCS also emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds
719	Abby Hanks	Virginia Community Action Partnersh	There are several key services and outcomes that we would like to see stay in the report, as they help tell the story of the great work being done in our communities. Those key services and outcomes we would like to see remain are: SRVs = 2i, 2j, 3m, 30, 4p 5hh, 5kk, 5mm, 5nn, 7a, 7b, 7c, 7m. FNPIs =le, 2a, 2b, 2e, 3b, 3d, 3e, 3g, 3h, 3i, 4d, 5d. One area of burden typically discussed is unduplicated count, this area was not addressed by the elimination of services and outcomes, allowing for service counts vs. people counts would eliminate some of the burden of unduplicated counts and give a better picture of the services	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
720	Abby Hanks	Virgin Islands Department of Human Services	With the proposed changes, we will need additional training and technical assistance for both the CSBG State Office and the eligible entities. We hope this training will be provided at the beginning of the process so we can ensure a smooth transition to the new reporting requirements. We also will need support for our required systems changes, the systems changes will have a significant cost, which will need to be covered with our administrative funds, this would not allow us to have as much available for training and technical assistance.	Alternative Response	OCS acknowledges this comment and shares that during the two-year phased implementation, we will increase our training and technical assistance on these reporting structures and as we currently provide the coding for databases at no-cost, we will continue to so systems can be updated to reflect the collection of information. OCS also emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
721	Christine Shall	Arizona Department of Economic Security	Mandatory Federal Fiscal Year (FFY) Reporting Period: In the CSBG Annual Report 3.0., OCS proposed that all modules would be reported using the Federal Fiscal Year (October 1 to September 30). This will pose challenges for the State of Arizona as the State uses the state fiscal year (SFY) reporting option. Modifications to subrecipient contracts, data systems, and other forms would be required and would result in undue burdens during the implementation phase. Contracts within the State of Arizona also follow the SFY and this change to the Annual Report, if implemented, would require the State Office to establish separate CSBG contracts	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical
722	Christine Shall	Arizona Department of Economic Security	Reorganization of Modules and Sections: While this may seem to be a cosmetic change with limited impact, its implications are far-reaching and inadvertently send the wrong message. The State of Arizona has data systems and data collection and reporting resources that follow thecurrent Report, including the use of the numbering system. Moving modules and/or sections around would require a significant overhaul of the forms and databases to realign with Annual Report 3.0.	Alternative Response	OCS acknowledges this comment and shares that during the two-year phased implementation, we will increase our training and technical assistance on these reporting structures and as we currently provide the coding for databases at no-cost, we will continue to so systems can be updated to reflect the collection of information. OCS also emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds
723	Christine Shall	Arizona Department of Economic Security	Changes to Services and National Performance Indicators (NPIs): Adhering to the proposed significant changes to the services and NPIs will require an overhaul of the current data systems, Community Action Plans, funding applications, and similar items currently in use by the State ofArizona CSBG Office. As with the reorganization of modules and sections, these changes would require significant time and financial resources on the part of the State of Arizona to realign them with the Annual Report 3.0.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
724	Christine Shall	Arizona Department of Economic Security	Timeline for Implementation: The proposed timeline for implementation is inadequate for the State of Arizona as well as our Network to effectively and accurately implement the required changes. The updates affect not only the Annual Report but also Community Action Plans wherethe Arizona CSBG Eligible Entities set their program targets as the planning phase of the ROMA cycle. FY26 Annual reporting begins with FY26 Community Action Plans. In Arizona, the FY26 Community Action Plan is due to be completed by each CSBG Eligible Entity in July 2025. TheState data system updates, reporting procedures, and Training and	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical
725	Christine Shall	Arizona Department of Economic Security	Movement from Outcomes to Outputs: For more than 20 years, the CSBG Network has prided itself on telling the story of its efforts, and NPIs play a vital role in that effort. Unlike services that communicate what was done, the NPIs communicate what results were achieved. The proposedAnnual Report 3.0 reflects a significant departure from this approach, focusing on outputs rather than outcomes. This change is a movement backward towards “bean counting” rather than what has changed for the clients we serve and the community as a result of CSBG Network efforts.Additionally, several of the proposed NPIs are duplicative of the services	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
726	Christine Shall	Arizona Department of Economic Security	Elimination of NPIs and Services: OCS indicated that removing NPIs and Services from the Annual Report 3.0 would decrease the burden of data collection. The Arizona CSBG State Office believes, however, that the current NPIs and Services are a menu of options from which CSBG Eligible Entities can choose, not a list that must be reported on. Therefore the actual result of the proposed decrease is the elimination of possible reporting options, not an actual decrease in the data collection burden. These significant changes will increase the administrative burden in the short term due to revisions to the current data collection and	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
727	Christine Shall	Arizona Department of Economic Security	It is important to point out that the State of Arizona uses the current lists of Services and NPIs to communicate and advocate at the state and community levels. As a result, it is concerning that the Services and NPIs included in their efforts are not in the proposed Annual Report 3.0. While OCS has emphasized that CSBG Lead Agencies and CSBG Eligible Entities will still be free to collect additional data beyond what is reported nationally, the result would be a shift of the reporting burden from the federal level to the state and local level, not an actual decrease in the reporting burden.	Request Change Not Accepted	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
728	Christine Shall	Arizona Department of Economic Security	Another consequence of the significant changes to the services and NPIs is the impact on trend analysis. As the current services and NPIs have been in place for almost ten years, there is considerable historical data available to the network for longitudinal trend analysis. However, as the proposed Annual Report 3.0, Services and NPIs would be significantly different. Either due to of deletion, modification, and/or merging, the ability to compare them with the 2.0 options would be significantly impacted, effectively eliminating the Network's ability to demonstrate CSBG's long-term outcomes and successes.	Alternative Response	OCS appreciates this feedback and notes that the remaining indicators align with the national goals as they are largely based on the current data points but written in a manner that aims to produce valid date that can be aggregated for national performance. The added indicators are largely based on the qualitative data submitted by local agencies and states in the 'other' sections of the report, and removed indicators that were underutilized by the network writ large, or utilized for national reporting.
729	Christine Shall	Arizona Department of Economic Security	The lack of change to the unduplicated number of individuals served requirement is of concern to the State of Arizona. This continues to be a barrier for many Arizona CSBG Eligible Entities and the CSBG Lead Agencies because this requirement is very difficult to meet. The majority of CSBG Eligible Entities must operate multiple data systems for the various programs they administer, and most systems do not have interoperability functionality. Obtaining an unduplicated count requires double data entry for most CSBG Eligible Entities or compiling the data in another program to identify duplicates. Regardless of the approach,	Request Change Not Accepted	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
730	Christine Shall	Arizona Department of Economic Security	In addition to our concerns outlined above, the State of Arizona requests that when the CSBG Annual Report 3.0 is implemented, adequate guidance and support be provided to the CSBG Lead Agencies and the CSBG Eligible Entities at the beginning of the process. This includes clear instructions and definitions items being collected to ensure that the Report is implemented consistently across the CSBG Network. Additionally, adequate training and technical assistance must be provided to assist with the understanding and implementation of the revised report and adequate financial support to modify the existing systems is made	Alternative Response	OCS acknowledges this comment and shares that during the two-year phased implementation, we will increase our training and technical assistance on these reporting structures and as we currently provide the coding for databases at no-cost, we will continue to so systems can be updated to reflect the collection of information. OCS also emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds
731	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	Areas of Concern: Burden has not been clearly defined When utilizing the ROMA cycle, we always start with an assessment that allows for a clearly defined need, because if we are not clear on what the need is, we cannot know what it is that needs to change. Results oriented thinking means that only after the need and outcome have been identified, do we then move to identification of the intervention to address the need and result in the desired change. I appreciate that OCS has recognized that a 'burden' does exist and hopes removing certain data points from the CSBG Annual Report would reduce said burden. However, it is	Alternative Response	OCS utilized the burden estimate formula developed for the current annual report and adjusted it based on the reductions and kept in mind there would be initial increases in burden to account for the changes during the periods where there is an overlap of 2.1 and 3.0 reports in FY26 (3.0 is optional in FY26 before becoming mandatory in FY27) but that it would adjust over time. It should be noted that burden estimates are largely estimates and the federal office through an incremental implementation intends to provide expansive technical assistance and
732	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	As noted in ACF-OCS-CSBG-DCL-24-09, "The CSBG Annual Report, as part of a national effort to strengthen the performance management culture of the CSBG Network, is intended to guide the collection and organization of meaningful performance data. This data showcases the programs and strategies grant recipients and subrecipients are using to address the causes and consequences of poverty, as well as initial outcomes, and it serves as a basis for program analysis at the local, state, and federal levels to increase understanding of what combination of services or strategies produce the best outcomes for specific populations,	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
733	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	As noted in ACF-OCS-CSBG-DCL-24-09, "The CSBG Annual Report, as part of a national effort to strengthen the performance management culture of the CSBG Network, is intended to guide the collection and organization of meaningful performance data. This data showcases the programs and strategies grant recipients and subrecipients are using to address the causes and consequences of poverty, as well as initial outcomes, and it serves as a basis for program analysis at the local, state, and federal levels to increase understanding of what combination of services or strategies produce the best outcomes for specific populations,	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
734	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	As noted in ACF-OCS-CSBG-DCL-24-09, "The CSBG Annual Report, as part of a national effort to strengthen the performance management culture of the CSBG Network, is intended to guide the collection and organization of meaningful performance data. This data showcases the programs and strategies grant recipients and subrecipients are using to address the causes and consequences of poverty, as well as initial outcomes, and it serves as a basis for program analysis at the local, state, and federal levels to increase understanding of what combination of services or strategies produce the best outcomes for specific populations,	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
735	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	As noted in ACF-OCS-CSBG-DCL-24-09, "The CSBG Annual Report, as part of a national effort to strengthen the performance management culture of the CSBG Network, is intended to guide the collection and organization of meaningful performance data. This data showcases the programs and strategies grant recipients and subrecipients are using to address the causes and consequences of poverty, as well as initial outcomes, and it serves as a basis for program analysis at the local, state, and federal levels to increase understanding of what combination of services or strategies produce the best outcomes for specific populations,	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
736	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	As noted in ACF-OCS-CSBG-DCL-24-09, "The CSBG Annual Report, as part of a national effort to strengthen the performance management culture of the CSBG Network, is intended to guide the collection and organization of meaningful performance data. This data showcases the programs and strategies grant recipients and subrecipients are using to address the causes and consequences of poverty, as well as initial outcomes, and it serves as a basis for program analysis at the local, state, and federal levels to increase understanding of what combination of services or strategies produce the best outcomes for specific populations,	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
737	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	As noted in ACF-OCS-CSBG-DCL-24-09, "The CSBG Annual Report, as part of a national effort to strengthen the performance management culture of the CSBG Network, is intended to guide the collection and organization of meaningful performance data. This data showcases the programs and strategies grant recipients and subrecipients are using to address the causes and consequences of poverty, as well as initial outcomes, and it serves as a basis for program analysis at the local, state, and federal levels to increase understanding of what combination of services or strategies produce the best outcomes for specific populations,	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
738	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	As noted in ACF-OCS-CSBG-DCL-24-09, "The CSBG Annual Report, as part of a national effort to strengthen the performance management culture of the CSBG Network, is intended to guide the collection and organization of meaningful performance data. This data showcases the programs and strategies grant recipients and subrecipients are using to address the causes and consequences of poverty, as well as initial outcomes, and it serves as a basis for program analysis at the local, state, and federal levels to increase understanding of what combination of services or strategies produce the best outcomes for specific populations,	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
739	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	As noted in ACF-OCS-CSBG-DCL-24-09, "The CSBG Annual Report, as part of a national effort to strengthen the performance management culture of the CSBG Network, is intended to guide the collection and organization of meaningful performance data. This data showcases the programs and strategies grant recipients and subrecipients are using to address the causes and consequences of poverty, as well as initial outcomes, and it serves as a basis for program analysis at the local, state, and federal levels to increase understanding of what combination of services or strategies produce the best outcomes for specific populations,	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
740	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	As noted in ACF-OCS-CSBG-DCL-24-09, "The CSBG Annual Report, as part of a national effort to strengthen the performance management culture of the CSBG Network, is intended to guide the collection and organization of meaningful performance data. This data showcases the programs and strategies grant recipients and subrecipients are using to address the causes and consequences of poverty, as well as initial outcomes, and it serves as a basis for program analysis at the local, state, and federal levels to increase understanding of what combination of services or strategies produce the best outcomes for specific populations,	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
741	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	As noted in ACF-OCS-CSBG-DCL-24-09, "The CSBG Annual Report, as part of a national effort to strengthen the performance management culture of the CSBG Network, is intended to guide the collection and organization of meaningful performance data. This data showcases the programs and strategies grant recipients and subrecipients are using to address the causes and consequences of poverty, as well as initial outcomes, and it serves as a basis for program analysis at the local, state, and federal levels to increase understanding of what combination of services or strategies produce the best outcomes for specific populations,	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
742	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	As noted in ACF-OCS-CSBG-DCL-24-09, "The CSBG Annual Report, as part of a national effort to strengthen the performance management culture of the CSBG Network, is intended to guide the collection and organization of meaningful performance data. This data showcases the programs and strategies grant recipients and subrecipients are using to address the causes and consequences of poverty, as well as initial outcomes, and it serves as a basis for program analysis at the local, state, and federal levels to increase understanding of what combination of services or strategies produce the best outcomes for specific populations,	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
743	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	In addition to the FNPIs listed below, I ask you to please retain the Z indicators in all domains, as removing them would eliminate the opportunity of local agencies to showcase how community action agencies are responsive to meeting the needs of specific communities based upon the findings from the Community Needs Assessment. We want to highlight the positive impact of innovation network wide.	Request Change Accepted	OCS acknowledges this comment. OCS accepts this edit and has updated all FNPIs to include an 'other' with requirement of description.
744	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 1g: Workshops	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
745	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 1i: Coaching	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
746	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 1j: Resume Development	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
747	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 1k: Interview Skills Training	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
748	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 1l: Job Referrals	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
749	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 1m: Job Placement	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
750	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 1n: Pre-employment physicals, background checks, etc.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
751	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 2w: Parenting Supports (may be a part of the early childhood programs identified above) *keep as individual services rather than combining into one (new 3.0 SRV 3c)	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
752	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 3g-1: Benefit Coordination and Advocacy (SRV 3g-l)	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
753	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 3g: Child Support Payments	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
754	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 3h: Health Insurance	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
755	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 3i: Social Security/SSI Payments	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
756	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 3j: Veteran's Benefits	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
757	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 3k: TANF Benefits	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
758	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 3l: SNAP Benefits	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
759	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 5mm: Parenting Classes	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
760	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 7a: Case Management	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
761	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 7b: Eligibility Determinations (SRV 7b)	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
762	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider retaining the following Services in CSBG Annual Report 2.0, as it is critical that agencies capture the variety of specific services provided to support individuals and families in obtaining outcomes. Without specific services noted, analysis is less effective, as the agencies will not have the opportunity to understand what specific service, or combination of services resulted in changes. SRV 7c: Referrals (SRV 7c)	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
763	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider revising the following proposed FNPIs (3.0) items, so that the focus is on the change (outcome), rather than on the service (output). This is a core element of results oriented thinking. CSBG AR Item 3.0: FNPI 2a Proposed Indicator: The number of young children (0-5) enrolled in childcare or early childhood education services. Suggested Revision: The number of children (0-5) who increase literacy skills.Rational: Enrolling in child care is an output, not an outcome. The language in the NPI should clearly articulate the change in status or condition upon receipt of the service.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
764	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider revising the following proposed FNPIs (3.0) items, so that the focus is on the change (outcome), rather than on the service (output). This is a core element of results oriented thinking. CSBG AR Item 3.0: FNPI2b Proposed Indicator: The number of youth actively connected to education and skills development programs. Suggested Revision: The number of youth who are meet and maintain academic and developmental milestones. Rational: Being connected to a program is an output, not an outcome. The language in the NPI should clearly articulate the change in status or condition upon receipt of the service.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
765	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider revising the following proposed FNPIs (3.0) items, so that the focus is on the change (outcome), rather than on the service (output). This is a core element of results oriented thinking. CSBG AR Item 3.0: FNPI2e Proposed Indicator: The number of individuals who enrolled in a post-secondary degree program (e.g., associates, bachelors, etc.) Suggested Revision: This proposed NPI can be removed, as suggested FNPI 2f, the number of individuals who obtain a post secondary degree suffices to capture the change in status. Rational: Enrolling in an education program is an output, not an outcome. The language in the NPI	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
766	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider revising the following proposed FNPIs (3.0) items, so that the focus is on the change (outcome), rather than on the service (output). This is a core element of results oriented thinking. CSBG AR Item 3.0: FNPI 3a Proposed Indicator: The number of individuals completing income and asset building training. Suggested Revision: The number of individuals who improve knowledge and skills related to income and asset building. Rational: Completing a training is an output, not an outcome. The language in the NPI should clearly articulate the change in status or condition upon completion of the service.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
767	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider revising the following proposed FNPIs (3.0) items, so that the focus is on the change (outcome), rather than on the service (output). This is a core element of results oriented thinking. CSBG AR Item 3.0: FNPI 4f Proposed Indicator: The number of individuals served with energy assistance or energy efficiency homes. Suggested Revision: The number of individuals who improved energy efficiency of reduced energy burden. Rational: Receiving energy assistance is a service, not an outcome. The language in the NPI should clearly articulate the change in status or condition after receipt of the service.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
768	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider revising the following proposed FNPIs (3.0) items, so that the focus is on the change (outcome), rather than on the service (output). This is a core element of results oriented thinking. CSBG AR Item 3.0: FNPI 5b Proposed Indicator: The number of individuals with access to health coverage. Suggested Revision: The number of individuals who obtain health coverage Rational: At the family level, having access to something is not the same thing as having something.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
769	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider revising the following proposed FNPIs (3.0) items, so that the focus is on the change (outcome), rather than on the service (output). This is a core element of results oriented thinking. CSBG AR Item 3.0: FNPI 5c Proposed Indicator: The number of individuals receiving reproductive services. Suggested Revision: *see statement below or, Number of individuals who have improved skills and/or knowledge related to reproductive health. Rational: Receiving reproductive services is an output, not an outcome. The language in the NPI should clearly articulate the change in status or condition after receipt of the	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
770	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider revising the following proposed FNPIs (3.0) items, so that the focus is on the change (outcome), rather than on the service (output). This is a core element of results oriented thinking. CSBG AR Item 3.0: FNPI 5c Proposed Indicator: The number of individuals receiving reproductive services. Suggested Revision: Number of individuals who have improved skills and/or knowledge related to maternal/child health. Rational: Receiving reproductive services is an output, not an outcome. The language in the NPI should clearly articulate the change in status or condition after receipt of the service.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
771	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider revising the following proposed FNPIs (3.0) items, so that the focus is on the change (outcome), rather than on the service (output). This is a core element of results oriented thinking. CSBG AR Item 3.0: FNPI 5d Proposed Indicator: The number of individuals receiving wellness services. Suggested Revision: *see statement below. Or, the number of individuals who maintain or improve well-being Rational: Receiving services is an output, not an outcome. The language in the NPI should clearly articulate the change in status or condition after receipt of the service.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
772	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider revising the following proposed FNPIs (3.0) items, so that the focus is on the change (outcome), rather than on the service (output). This is a core element of results oriented thinking. CSBG AR Item 3.0: FNPI 5e. Proposed Indicator: The number of older adults (age 65+) receiving home visiting services. Suggested Revision: The number of older adults age 65+ who maintained an independent living situation. Rational: Receiving reproductive services is an output, not an outcome. The language in the NPI should clearly articulate the change in status or condition after receipt of the service.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
773	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider revising the following proposed FNPIs (3.0) items, so that the focus is on the change (outcome), rather than on the service (output). This is a core element of results oriented thinking. CSBG AR Item 3.0: FNPI 5g. Proposed Indicator: The number of adults receiving preventative oral health services. Suggested Revision: *see statement below. OR, change to the number of adults who maintain or improve oral health Rational: Receiving reproductive services is an output, not an outcome. The language in the NPI should clearly articulate the change in status or condition after receipt of the service.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
774	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider revising the following proposed FNPIs (3.0) items, so that the focus is on the change (outcome), rather than on the service (output). This is a core element of results oriented thinking. CSBG AR Item 3.0: FNPI 5h. Proposed Indicator: The number of children receiving preventative oral health services. Suggested Revision: The number of children who maintain or improve oral health Rational: Receiving reproductive services is an output, not an outcome. The language in the NPI should clearly articulate the change in status or condition after receipt of the service.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
775	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider revising the following proposed FNPIs (3.0) items, so that the focus is on the change (outcome), rather than on the service (output). This is a core element of results oriented thinking. CSBG AR Item 3.0: FNPI 5i. Proposed Indicator: The number of individuals receiving access to healthy food options. Suggested Revision: The number of individuals who report increased food security Rational: At the family level, having access to something is not the same thing as having something.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
776	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider revising the following proposed FNPIs (3.0) items, so that the focus is on the change (outcome), rather than on the service (output). This is a core element of results oriented thinking. CSBG AR Item 3.0: SRV 2.n Proposed SRV: The number of individuals attending basic education classes (e.g.: financial literacy) Suggested Revision: The number of individuals attending basic education classes Rational: Remove financial literacy, as that is captured in the Income and Asset building section and could lead to duplication of reporting	Request Change Accepted	OCS acknowledges this comment and removing SRV due to overlap and redundancy with other SRV in Adult Education and Skills Development programs section.
777	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I ask you to please consider revising the following proposed FNPIs (3.0) items, so that the focus is on the change (outcome), rather than on the service (output). This is a core element of results oriented thinking. CSBG AR Item 3.0: SRV 2r Proposed SRV: The number of families participating in an evidence-based home visiting program Suggested Revision: The number of families participating in a home visiting program Rational: Many home visiting programs utilized by community action agencies are evidence informed v. evidence based	Request Change Accepted	OCS acknowledges this comment and has revised language as requested.
778	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I also recommend adding the following indicators to support proper performance measurement of our network: FNPI 3: the number of individuals who improved their credit score; the number of individuals who increase financial literacy, to capture the full range of outcomes that can be obtained in this domain.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
779	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I also recommend adding the following indicators to support proper performance measurement of our network: FNPI 4: the number of individuals who maintain utility connection and avoid disconnection of services.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
780	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	I also recommend adding the following indicators to support proper performance measurement of our network: While there is an addition of a new Transportation domain for services, there appears to be no recommended added domain of such in the FNPIs. The transportation services listed in CSBG Annual Report 3.0 can align with the following indicators: the number of individuals who obtain transportation; the number of individuals who maintain transportation.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
781	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	Area of Concern: Services to Outcome Plan has limited implementation instructions, and can give the impression of a 1:1 service to outcome relationship This kind of mapping can be extremely helpful to help staff think about the relationship between services and outcomes. But with only giving 1:1 examples, and removing the services to support multiple domains category, this can oversimply the role that community action agencies play in helping individuals and families obtain safety and security. Most of our customers present with challenges across multiple domains, and a combination of services (concrete supports,	Request Change Not Accepted	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job
782	Carey L. Gibson	Association of Nationally Certified ROMA Trainers	Area of Concern: The directive that proposes Module 4 (currently Module 3), representing community level work, is considered ‘optional’ minimizes the role of community action in revitalizing communities Improving the conditions in which people live, specifically revitalization of communities, is part of the statutory purpose of CSBG. Two of the three goals in the National Theory of Change are community level, and community action agencies across our nation engage in a variety of strategies to improve conditions related to housing, employment, education, infrastructure, transportation, etc. These efforts are truly	Request Change Not Accepted	OCS acknowledges this comment and notes that Community Level Transformation is recommended but not required due to the content of submissions in previous years, indicating the need for increased technical assistance and also keep in mind there are a vast array of state and local agencies that may not have the capacity to carry out a transformation initiative based on their funding levels. OCS believes that with enhanced training and technical assistance once we have addressed data validity in the current reporting structure, we can work collectively to build capacity
783	Katie Neher	District XI Human Resource Council	The elimination of Services Supporting Multiple Domains, especially case management and eligibility determination services, will negatively impact the HRC’s ability to record, track, and report on households and individuals who received CSBG-funded assistance. One of the HRC’s most important roles in the community is that of a service hub and resource navigator for people who are working to understand what support they need and qualify for. We administer the 2-1-1 resource and referral call line for our three-county service area and also maintain a robust front-desk staff who field near-constant walk- and call-ins. Our	Request Change Not Accepted	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job
784	Katie Neher	District XI Human Resource Council	Removal of the Household Income Source datapoint will elide key information about service recipients and reduce the HRC’s ability to communicate the impact of our work and the realities of poverty in our service area, as well as negatively affect our ability to target and strategize on this datapoint. A common misconception about low-income individuals is that they don’t work and they live entirely off subsidies. Many of our clients do have earned income, and collecting information on income sources allows the HRC to provide granting entities and community members a clear, complete account of what poverty looks like in our	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
785	Katie Neher	District XI Human Resource Council	Including outputs alongside outcomes in FNPIs duplicates service reporting, makes impact reporting less clear, and undermines the ROMA framework CAAs are statutorily mandated to use. The difference between an output and an outcome is an important distinction in ROMA, and some newly proposed FNPIs confuse the two. An output is something that is already captured by the reporting of a service; for example, if an individual was receiving financial planning classes through a CAA, their attendance at those classes is an output, whereas earning a certificate or increasing their understanding the topic is an outcome. Reporting	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
786	Katie Neher	District XI Human Resource Council	The process for streamlining and reducing the number of reportable services should be conducted utilizing the network that does the work and knows the value of the data. While the HRC applauds OCS’ work to reduce administrative burden and unnecessary complication, there is a delicate balance between a system simple enough to function efficiently and complicated enough to capture the nuances of the large, diverse national network of CAAs. A guiding principle of community action is that the initiatives and agencies are driven by local needs, which creates a huge amount of variation across the country, or even between	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
787	Lynne Algrant	Greater Bergen Community Action	Given the deadlines we are facing, GBCA urges you to recertify CSBG Annual Report 2.1 and allow greater participation of CAAs in the shaping of the Annual Report 3.0.	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an
788	Lynne Algrant	Greater Bergen Community Action	The removal of “Services Supporting Multiple Domains” significantly impacts our agency. In our last strategic plan, we specifically set goals and objectives to enroll clients in more than one program within our agency, recognizing that it takes multiple, complex efforts to help move a family out of poverty. Eliminating our ability to report on Case Management (SRV 7a), Eligibility Determination (SRV 7b), and Referrals (SRV 7c) does not change the fact that these services are essential to our work, these efforts just won’t count anymore.	Alternative Response	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job
789	Lynne Algrant	Greater Bergen Community Action	While we understand that providing services to immigrants may not be politically popular across the nation, working in a community in which over 40% of the population are immigrants, immigrant services are essential to our mission. GBCA needs to be able to report on our efforts with this population in order to maintain credibility in our community.	Request Change Not Accepted	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency
790	Lynne Algrant	Greater Bergen Community Action	The elimination of Legal Services is puzzling. GBCA provides legal services for immigrants and counseling for tenants. Studies have shown that the inability to access quality legal services, particularly in eviction related matters, has a devasting impact on poor families. Legal services are essential to CAAs.	Request Change Not Accepted	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency
791	Lynne Algrant	Greater Bergen Community Action	Community Level work is not optional. In fact, it is essential to the innovation for which GBCA has used CSBG dollars. CSBG helped us establish 1st Bergen Federal Credit Union, which now has over 2500 members and assets of over $8 million. Through the support of CSBG and the organizational capacity we have built, GBCA created a solar company, serves as the neighborhood preservation coordinator for two cities, and has developed housing.	Request Change Not Accepted	OCS acknowledges this comment and notes that Community Level Transformation is recommended but not required due to the content of submissions in previous years, indicating the need for increased technical assistance and also keep in mind there are a vast array of state and local agencies that may not have the capacity to carry out a transformation initiative based on their funding levels. OCS believes that with enhanced training and technical assistance once we have addressed data validity in the current reporting structure, we can work collectively to build capacity
792	Lynne Algrant	Greater Bergen Community Action	Data reporting requirements are daunting in our work. However, the burden often stems from the multiple data systems that we are required to use, most of which do not interact with each other seamlessly. None of the proposed changes in the CSBG Annual Report 3.0 alleviate these problems. Most importantly, the proposed changes will make our efforts less transparent and could have the impact of making our work seem less vital and less important.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
793	Lynne Algrant	Greater Bergen Community Action	Poverty in the United States if grossly misunderstood and overly burdened with myths and stereotypes. The CSBG Annual Report should be a document that helps demystify poverty. It is essential that lawmakers and tax payers know how many people we serve who are working, therefore it is imperative we continue to report on “Sources of Income.”	Request Change Not Accepted	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency
794	Aaron Bowen	Eastern Nebraska Community Action Partnership	Some of the revisions we welcome—the addition of concrete supports and removal of duplication of items, for example	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
795	Aaron Bowen	Eastern Nebraska Community Action Partnership	A number of proposed changes shift emphasis from change-making to service provision. We know that families need services (e.g. food pantries, utility assistance, etc.) to reach greater independence and social and economic mobility, but changes like reducing the emphasis on outcomes, eliminating acknowledgement of the impact of bundled services and case management, and decreasing employment tracking defy the letter and spirit of the CSBG Act and the Community Action movement overall.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
796	Aaron Bowen	Eastern Nebraska Community Action Partnership	Rule number one of documenting progress of any intervention is not to change how you collect or report midstream. Although it has been years since the CSBG Annual Report has changed substantially, the changes OCS proposes will set us back, skew folks’ understanding of our success, and change the trajectory of our network long into the future. Frankly, there are may agencies who, due to a diversity of factors, struggle to understand and/or complete the current annual report. Changing the report further will not solve this issue, but instead exacerbate the problem of inaccurate or confused reporting.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
797	Aaron Bowen	Eastern Nebraska Community Action Partnership	I ask that OCS only move forward with CSBG Annual Report 2.1 (Version 2.1) and make a meaningful effort to engage more of our network in creating a full revision of the CSBG Annual Report.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
798	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	If changes are made to the reporting requirements, every Community Action Agency and state associations will require extra funding to meet these new reporting mandates. Part of these increased cost will be required to upgrade and expand our software and systems. Additional funding will also be necessary for all local CSBG eligible offices due to the additional work and training required to meet these new reporting requirements.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
799	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	We will have difficulty in adhering to these proposed changes since the Kentucky State Office has stated they will not change to the Federal Fiscal Year. This will never allow for our money to be correct on Module 2.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
800	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Our agency as well as CAK believe this will erode both the quality and clarity of ROMA and/or PEAAK which will result in less accurate information that is provided to OCS.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
801	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Semantics matter and simply changing how we describe our outcomes to service language (received, enrolled, connected) diminishes the achievements of the outcomes. Our agency, as well as CAK have concerns that the quality and effectiveness of the FNPIs and Services may be diminishing. These proposed changes will make it more difficult to document the progress made in assisting individuals towards economic security. An agency will encounter difficulties in accurately demonstrating the progress they have made in assisting individuals towards economic security.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
802	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	The proposed numbering format of the Modules will lead to confusion for CSBG eligible entities. We recommend maintaining the existing Module numbering system (Module 4a FNPIs, Module 4b Services, Module 4c All Characteristics Report, Module 3 Community).	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
803	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	These recommended changes will diminish and possible prevent the State and the State Association ability to document the success of our efforts to the desired outcomes that clients have reached by using their annual reports. It will be more labor intensive to reach out to each agency to request additional information to make snapshots for legislative visits, etc. (e.g., how many people did you helped find employment). This will result in a reduced Return on Investment (ROI) which will actually cause a decrease in the Office of Community Services (OCS) mission of partnering “with states, tribes, territories, and non-profit and community-based	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
804	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	PACS and CAK prefers retaining the following in the All-Characteristics Report: Single Parent Female and Single Parent Male. This is useful for agencies when applying for certain grants (e.g., Fatherhood Initiatives, etc.). This could cause additional efforts and steps when agencies apply for grants.	Request Change Not Accepted	OCS acknowledges this comment and appreciates the feedback. The report revisions were to ensure we addressed the expansive nature of performance measures across CSBG while meeting the requirements of the CSBG Act, the findings of the CSBG Government Accountability Office (GAO) report, and minimize the burden on the public under the Paperwork Reduction Act. The connection between service to outcome also enhances how we tell the national story of CSBG.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
805	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	We further prefer leaving the following in the All-Characteristics Report: Income Sources allow agencies to better know and track who we provide services to as well as provide a much cleaner and clearer message of who is served.	Request Change Not Accepted	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency
806	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	We also are concerned with the new OCS Dashboard (website) that will roll out in the future. By combining and lumping services and not showing specific outcomes we will not show a complete and accurate reporting for OCS website, to the public, legislators, other funding sources, etc.? Tis my default will lessen the work and value of the work that a CSBG eligible entities does.	Alternative Response	OCS acknowledges this comment and all related performance management tools including websites, dashboards, and technical assistance materials will be calibrated to reflect what is reported in future years.
807	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Employment: By eliminating the actual count of unemployed adults who obtained employment as a FNPI removes a very important and critical indicator for CSBG eligible entities, and which is a required the CSBG Act. As stated, obtaining employment should be included and additional programs and services to explain how employment was obtained should be added (e.g., Job Readiness Training, Resume Development, Interview Skills Training, etc.)	Request Change Not Accepted	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements
808	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Income and Asset Building Services: SRV 3d – This area should this be moved to Domain 7 Transportation.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
809	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Income and Asset Building Services: There are no services to match the new NPI 3b. We recommend documenting the number of individuals who opened a savings account or other asset building accounts or IDA or NPI 3c for the number of individuals who purchased a home as well as anyone receiving Homebuyer Counseling and other homebuying support services. The proposed changes will result in an agency having difficulties in accurately demonstrating the progress they have made in assisting individuals towards economic security.	Request Change Not Accepted	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job
810	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Housing: SRV 4g: The number of households receiving weatherization services. This does not necessarily align with the FNPI 4f - The number of individuals served with energy assistance and/or energy efficiency homes. Served with energy assistance is included in a service such as LIHEAP.	Request Change Not Accepted	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
811	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Housing: SRV 4g: FNPI 4 - The number of individuals provided with improved water safety in their homes maybe reached it someone had water safety which is included in SRV 4f. This will aid in the number of individuals receiving housing maintenance and improvement services (e.g., structural, accessibility improvements, emergency home repairs, water safety, healthy home).	Request Change Not Accepted	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job
812	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Civic Engagement and Community Involvement: We are concerned that the Leadership Training has been removed from the services. How then will we equip and prepare for future leaders is this “quest to reduce the causes and consequences of poverty, increase opportunity and economic security of individuals and families, and revitalize communities. Our social service and community development programs work in a variety of ways to improve the lives of many.”	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
813	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Transportation Domain: SRV 3d - The number of individuals receiving transportation services supporting income and asset building (e.g.: bus voucher or pass to training, etc.) may be better reflected in Domain 7 Transportation?	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
814	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Multiple Domains: Why was Case Management removed? By eliminating this requirement there is little actual documentation of truly making a difference in the lives of those we serve. We SHOULD FOCUS on the outcomes and not the transactions. This provides a false “glimpse” of the impact we are making.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
815	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Multiple Domains: Why were referrals removed? Without referrals there will be fewer folks served and/or helped.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
816	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Multiple Domains: Why were eligibility determinations removed? How can taxpayers and our funding sources actually know who qualifies for services? The impact of removing or reducing services under Multiple Domains lessens an agency's work in the mission of OCS’s “quest to reduce the causes and consequences of poverty, increase opportunity and economic security of individuals and families, and revitalize communities. Our social service and community development programs work in a variety of ways to improve the lives of many.”	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
817	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Employment: The number of unemployed adults who obtained employment has been removed but this is part of the CSBG Act and a very important indicator for CSBG eligible entities.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
818	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Education: 2a - The number of children ages 0-5 enrolled in childcare or early childhood education services measures an output and not an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
819	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Education: 2b - The number of youths actively connected to education and skills development programs measures an output and not an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
820	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Education: 2e - The number of individuals who enrolled in post-secondary degree program (e.g., associates, bachelors, etc.) only measures enrollment and does not measure achievements.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
821	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Income and Asset Building Services: 3a - The number of individuals completing income and asset building training will only measure completion of a training and does not reflect the accomplishment of an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
822	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Income and Asset Building Services: There are no services to match the new NPI 3b so why make a change in the proposed reporting?	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
823	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Housing: Clarity is required for the proposed changes for FNPI 4f - why was 'served with energy assistance' added? Is this still a Weatherization outcome or do you now count LIHEAP assistance here? If so, LIHEAP assistance is an output (service), not an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
824	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Housing: Clarity is required for the proposed changes for FNPI 4g - individuals served with improved water safety in their homes - is the LIHWAP? Individuals served would be an output (service), not an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
825	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Health: Clarity is required for the proposed changes for FNPI 5b - The number of individuals with access to health coverage. These are outputs or services and not outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
826	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Health: Clarity is required for the proposed changes for FNPI 5c – The number of individuals receiving reproductive services are outputs or services and not outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
827	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Health: Clarity is required for the proposed changes for FNPI 5d – The number of individuals receiving wellness services are outputs or services and not outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
828	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Health: Clarity is required for the proposed changes for FNPI 5e – The number of older adults (age 65+) receiving home visiting services are outputs or services and not outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
829	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Health: Clarity is required for the proposed changes for FNPI 5g – The number of adults receiving preventative oral health services are outputs or services and not outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
830	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Health: Clarity is required for the proposed changes for FNPI 5h – The number of children receiving Preventative oral health services are outputs or services and not outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
831	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Health: Clarity is required for the proposed changes for FNPI 5i – The number of individuals receiving access to healthy food options are outputs or services and not outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
832	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Health: Why was the old 5f removed (The number of seniors (65+) who maintained an independent living situation)? Does OCS no longer care about our senior citizens? For PACS and other agencies supporting senior independent living, this is an important FNPI. The proposed changes seem to be in direct conflict with Title III of the Older Americans Act (OAA) which funds state and local agencies to provide in-home and community-based services for older adults. The program aims to develop comprehensive and coordinated systems of care that address the needs of older individuals, especially those with the greatest economic or social	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
833	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Household Level Characteristics: I prefer leaving the following: Single Parent Female and Single Parent Male as these are useful for agencies when applying for certain grants (e.g., Fatherhood Initiatives, etc.).	Request Change Not Accepted	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency
834	Pennyrile Allied Community Services, Inc. and Community Action Kentucky	Pennyrile Allied Community Services, Inc.	Household Level Characteristics: I prefer leaving the following in the All-Characteristics Report: Income Sources allows agencies to know who they are serving and helps to breakdown myths of who is served.	Request Change Not Accepted	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
835	David Knight	California Community Action Partnership Association	We commend OCS for its commitment to reducing the reporting burden and enhancing the quality of data collected.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
836	David Knight	California Community Action Partnership Association	The proposed changes in Version 3.0 significantly compromise the quality of the CSBG Annual Report on several fronts. As previously described, the CSBG Annual Report serves as a crucial tool in detailing how CAAs strategically allocate those resources to reduce poverty, revitalize low-income communities, and empower low-income families and individuals in rural and urban areas to become fully self-sufficient. As detailed below, OCS's proposed elimination of numerous data points results in the report losing its capacity to comprehensively convey the diverse and nuanced approaches CAAs deploy to meet these localized needs. This diminishes	Alternative Response	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements
837	David Knight	California Community Action Partnership Association	The original intent of Community Action, as defined by the Economic Opportunity Act (Title II, Part A, Section 201), is to provide stimulation and incentive for both urban and rural communities to mobilize their resources to combat the root causes of poverty. The Act specifies that Community Action Agencies should provide services, assistance, and other activities of sufficient scope and size to promise progress toward the elimination of poverty or its causes (Section 202). While Module 2 of the new report adequately provides the opportunity for organizations to report leveraged resources, the limited selection of FNPIs and the	Alternative Response	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements
838	David Knight	California Community Action Partnership Association	A CalCAPA CSBG EE member ran a comparison spreadsheet using the new Indicator Disposition Report and created a crossroad to their current CSBG annual report because they wanted to know "what will change for them" for reporting. This agency will go from reporting 26 FNPIs to 10 FNPIs, from 27 SRVs to 12 SRVs, and from 157 CCRs to 112 CCRs. For them alone, it's a big change not being able to fit some of their programs, including outcomes like the 90 and 180-day for both employment and housing. They are not alone in our survey of the California CSBG EEs whose measured outcomes will be negatively impacted.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
839	David Knight	California Community Action Partnership Association	In the realm of goal achievement and productivity, there is a popular saying: "What gets measured gets done." This simple yet profound statement highlights the powerful impact of measurement on our ability to accomplish tasks and reach our desired outcomes. The act of measurement brings several benefits. Primarily, it provides clarity and focus. When we have a clear understanding of what needs to be accomplished and how to measure it, we can direct our energy and resources effectively. Measurement acts as a guiding compass, showing us the path to success and enabling us to stay on track. Additionally, measurement	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
840	David Knight	California Community Action Partnership Association	Similarly, 42 USC 9908 (b)(1)(A) mandates that CSBG funds be used to remove obstacles to self-sufficiency, secure and retain meaningful employment, attain adequate education, and obtain and maintain adequate housing, among other objectives. Thus, it would be expected that the revised report would include detailed indicators for each of these areas to comply with federal mandates and to illustrate the comprehensive impact of Community Action. It is our opinion that a number of these critical reporting elements have been removed from the current document, which in turn removes our ability to show accountability. When we	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
841	David Knight	California Community Action Partnership Association	Furthermore, it is concerning that basic ROMA principles were not utilized for the development of this report. While statements made in the listening session suggest that analytics were used, there was a significant question regarding expertise from within the Network being adequately leveraged to develop a strategy for identifying essential reporting elements that aligned with the Network's goals. It is acknowledged that external perspectives can be valuable for forward momentum; however, as previously mentioned, harnessing the vast experience and expertise of those within the Community Action Network is vital	Alternative Response	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements
842	David Knight	California Community Action Partnership Association	A critical aspect, highlighted in Module 4 of the Introduction to ROMA Training, emphasizes that "National Performance Indicators are a selective sampling of what we do, and reflect only a portion of our work and accomplishments." It underscores the expectation that Community Action Agencies report annually on their full range of outcomes, in addition to the required standard set of national indicators. Importantly, the training module suggests flexibility for agencies to include additional indicators that capture the entirety of their impact, fostering innovation by allowing agencies to demonstrate unique or emerging outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
843	David Knight	California Community Action Partnership Association	The current draft predominantly uses terms that emphasize outputs rather than outcomes, which may not fully convey the effectiveness of the services provided. For instance, terms like "enrolled" in FNPI 2a and 2e, "connected" in FNPI 2b, "completing training" in FNPI 3a, "served" in FNPI 4f, 4g, and 5a, and "receiving services" in FNPI 5c, 5d, 5e, 5f, 5g, 5h, and 5i, focus primarily on the activities themselves rather than the actual impact on participants' lives. To truly reflect the transformative effects of Community Action Programs and adhere to ROMA principles, these indicators should be revised to reflect outcomes such as	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
844	David Knight	California Community Action Partnership Association	The current draft predominantly uses terms that emphasize outputs rather than outcomes, which may not fully convey the effectiveness of the services provided. For instance, terms like "enrolled" in FNPI 2a and 2e, "connected" in FNPI 2b, "completing training" in FNPI 3a, "served" in FNPI 4f, 4g, and 5a, and "receiving services" in FNPI 5c, 5d, 5e, 5f, 5g, 5h, and 5i, focus primarily on the activities themselves rather than the actual impact on participants' lives. To truly reflect the transformative effects of Community Action Programs and adhere to ROMA principles, these indicators should be revised to reflect outcomes such as	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
845	David Knight	California Community Action Partnership Association	The current draft predominantly uses terms that emphasize outputs rather than outcomes, which may not fully convey the effectiveness of the services provided. For instance, terms like "enrolled" in FNPI 2a and 2e, "connected" in FNPI 2b, "completing training" in FNPI 3a, "served" in FNPI 4f, 4g, and 5a, and "receiving services" in FNPI 5c, 5d, 5e, 5f, 5g, 5h, and 5i, focus primarily on the activities themselves rather than the actual impact on participants' lives. To truly reflect the transformative effects of Community Action Programs and adhere to ROMA principles, these indicators should be revised to reflect outcomes such as	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
846	David Knight	California Community Action Partnership Association	The current draft predominantly uses terms that emphasize outputs rather than outcomes, which may not fully convey the effectiveness of the services provided. For instance, terms like "enrolled" in FNPI 2a and 2e, "connected" in FNPI 2b, "completing training" in FNPI 3a, "served" in FNPI 4f, 4g, and 5a, and "receiving services" in FNPI 5c, 5d, 5e, 5f, 5g, 5h, and 5i, focus primarily on the activities themselves rather than the actual impact on participants' lives. To truly reflect the transformative effects of Community Action Programs and adhere to ROMA principles, these indicators should be revised to reflect outcomes such as	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
847	David Knight	California Community Action Partnership Association	The current draft predominantly uses terms that emphasize outputs rather than outcomes, which may not fully convey the effectiveness of the services provided. For instance, terms like "enrolled" in FNPI 2a and 2e, "connected" in FNPI 2b, "completing training" in FNPI 3a, "served" in FNPI 4f, 4g, and 5a, and "receiving services" in FNPI 5c, 5d, 5e, 5f, 5g, 5h, and 5i, focus primarily on the activities themselves rather than the actual impact on participants' lives. To truly reflect the transformative effects of Community Action Programs and adhere to ROMA principles, these indicators should be revised to reflect outcomes such as	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
848	David Knight	California Community Action Partnership Association	To maintain alignment with performance management principles, all activities of the Network should be provided to address a specific problem. The removal of this problem is measured using an outcome. Some of the new services do not include outcomes, which contrasts with any performance management principles and practices.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
849	David Knight	California Community Action Partnership Association	Report Field A.1. The new format introduced in the CSBG Annual Report, which breaks down CSBG allocation expenditures into regular allocation, carryover, discretionary, and discretionary carryover, is a commendable improvement. This categorization is crucial as it addresses a common reporting issue where organizations previously struggled to accurately account for different types of funding. However, we recommend a minor yet significant clarification in terminology: the term "allocation" could be misleading, as it might be interpreted by agencies as referring to the total funds allocated rather than the portion that	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
850	David Knight	California Community Action Partnership Association	Section A.2, CalCAPA does not agree with the removal of the option to report expenditures supporting multiple domains. Much of CSBG funding supports first-line management, clerical, janitorial and maintenance staff, building maintenance, utilities, and other common costs. These expenditures support all the activities of agencies and cannot be easily allocated to a specific domain. The removal of this begins to signify direct service funding and move CSBG away from the idea of building capacity and expanding an agency to maximize results.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
851	David Knight	California Community Action Partnership Association	Section B. In previous versions of the report, data on agency staff certifications was collected, which played a significant role in substantiating the capabilities and qualifications of staff involved in executing CSBG-funded programs. Restoring this data collection would not only enhance transparency, but also support agencies in defending organizational funds by showcasing the expertise and professionalism of their staff. We suggest not only maintaining this element in the document to continue highlighting the preparedness and qualifications of personnel within the network, but to also expand that element to provide agencies with the opportunity	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
852	David Knight	California Community Action Partnership Association	Report Field C.1. The previous format allowed agencies to directly report CSBG allocations, which is essential for transparency and effective financial oversight. Many agencies have previously attempted to include these figures in an "Other" category, which can lead to inconsistencies and confusion. We recommend adding a dedicated section to report CSBG allocations explicitly, thereby reducing confusion and streamlining financial reporting. This adjustment will clarify the total amount available to each entity and support more accurate financial management and reporting.	Request Change Not Accepted	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
853	David Knight	California Community Action Partnership Association	Module Reordering. Changing module numbers may improve logical flow at a national level but could cause significant confusion among network agencies accustomed to the current structure. Adequate training and clear guidance will be essential to mitigate this confusion.	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
854	David Knight	California Community Action Partnership Association	Also advise removing the comparisons to prior year reporting. The explanations required when reported metrics are out of line with expectations or with prior year reporting adds to the reporting burden without an increase in data value. This is the overall crutch to delayed reporting from states and the collaboration of the report at the federal level.	Request Change Not Accepted	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
855	David Knight	California Community Action Partnership Association	General Service Comment. Service reporting could be further simplified to goods, services, payments, and referrals for each domain.	Request Change Not Accepted	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
856	David Knight	California Community Action Partnership Association	Section SRV 3. Include "case management" as a distinct service since it often encompasses comprehensive plans for moving individuals out of poverty, which aligns with the overarching goals of Community Action.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
857	David Knight	California Community Action Partnership Association	Service SRV 3d. Remove SRV 3d and consolidate all transportation services to avoid duplication and confusion, allowing outcomes to be clearly associated with the service provided.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
858	David Knight	California Community Action Partnership Association	Section SRV 4. Simplify by categorizing services into "housing payments (rent/mortgage)," "utility payments," "housing counseling," "housing goods," and "housing services." This modification aims to reduce confusion and improve data clarity.	Request Change Not Accepted	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
859	David Knight	California Community Action Partnership Association	Section SRV 4. The word “emergency” should be removed from descriptions to allow for reporting of ongoing support for those agencies that operate longer term subsidized housing programs.	Request Change Not Accepted	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
860	David Knight	California Community Action Partnership Association	Section SRV 5. The term “Seniors” should not be defined by the report as “65+”. Various programs serving “seniors” have different age requirements that often include those younger than 65; the Older Americans Act defines eligibility for senior services as 60+, while HUD defines senior housing eligibility as 62+. Agencies need to be able to report all participants that were served according to the guidelines of the program being operated.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g.: service, indicator, domain)
861	David Knight	California Community Action Partnership Association	Suggest replacing the current description in SRV 5d and SRV 5j with the term, “older adults” as is used in SRV 5i.	Request Change Not Accepted	OCS acknowledges this comment. Across the federal government, seniors and older adults are used interchangably. To prevent confusion, since an age range is not defined, OCS has decided to use seniors.
862	David Knight	California Community Action Partnership Association	Section SRV 6. Clarify whether SRV 6b includes all board members or only those who are low-income, and consider adding "community engagement skill-building" to allow reporting on broader engagement activities. SRV 6b should include all board members. Since agencies do not screen for income on their Board of Directors, it is difficult to determine which members qualify as low-income. Those serving in the low-income slots may represent low-income populations without being low-income themselves. Since the statutes and organizational standards require and monitor low-income representation on the tripartite board, reporting	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
863	David Knight	California Community Action Partnership Association	SRV 6c. Participation in self-sufficiency services is not a Civic Engagement and Community Involvement service. This is more appropriately placed in SRV 3 Income and Asset Building.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
864	David Knight	California Community Action Partnership Association	SRV 6e. The number of individuals participating in community engagement and organizing training. This would track to FNPI 6a.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
865	David Knight	California Community Action Partnership Association	Section SRV 7. If added, ensure there is no duplication of transportation services reported in other sections, and simplify to "transportation payments" to cover all types of transportation aids. We advocate for removing SERV 7c and SERV 7d, but retaining the separate categories of SERV 7a, 7b and 7e.	Alternative Response	OCS acknowledges this comment and notes all service counts are no longer based solely on the number of individuals served but are flexible for different units of measurement. The column for Transportation (SRV 7) now reads Unduplicated Number Served so the unit of measuremenr would be the voucher, pass, card, ride, or form of assistance. OCS will release supplemental materials and guides to provide more training and explanatory language on this service domain.
866	David Knight	California Community Action Partnership Association	Section SRV 7. If added, ensure there is no duplication of transportation services reported in other sections, and simplify to "transportation payments" to cover all types of transportation aids. We advocate for removing SERV 7c and SERV 7d, but retaining the separate categories of SERV 7a, 7b and 7e.	Alternative Response	OCS acknowledges this comment and notes all service counts are no longer based solely on the number of individuals served but are flexible for different units of measurement. The column for Transportation (SRV 7) now reads Unduplicated Number Served so the unit of measuremenr would be the voucher, pass, card, ride, or form of assistance. OCS will release supplemental materials and guides to provide more training and explanatory language on this service domain.
867	David Knight	California Community Action Partnership Association	Section SRV 7. If added, ensure there is no duplication of transportation services reported in other sections, and simplify to "transportation payments" to cover all types of transportation aids. We advocate for removing SERV 7c and SERV 7d, but retaining the separate categories of SERV 7a, 7b and 7e.	Alternative Response	OCS acknowledges this comment and notes all service counts are no longer based solely on the number of individuals served but are flexible for different units of measurement. The column for Transportation (SRV 7) now reads Unduplicated Number Served so the unit of measuremenr would be the voucher, pass, card, ride, or form of assistance. OCS will release supplemental materials and guides to provide more training and explanatory language on this service domain.
868	David Knight	California Community Action Partnership Association	Section SRV 7. If added, ensure there is no duplication of transportation services reported in other sections, and simplify to "transportation payments" to cover all types of transportation aids. We advocate for removing SERV 7c and SERV 7d, but retaining the separate categories of SERV 7a, 7b and 7e.	Alternative Response	OCS acknowledges this comment and notes all service counts are no longer based solely on the number of individuals served but are flexible for different units of measurement. The column for Transportation (SRV 7) now reads Unduplicated Number Served so the unit of measuremenr would be the voucher, pass, card, ride, or form of assistance. OCS will release supplemental materials and guides to provide more training and explanatory language on this service domain.
869	David Knight	California Community Action Partnership Association	General FNPI Comment. Add an “Other” outcome section for each domain to foster innovation and identify new reporting trends in the network.	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an ‘other’ with requirement of description.
870	David Knight	California Community Action Partnership Association	Section FNPI 1. Add outcomes that specifically measure the securing and maintaining employment of unemployed people, as specified in the CSBG Statutes.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
871	David Knight	California Community Action Partnership Association	Outcomes FNPI 1a and 1b are not necessary and are duplicative of FNPI 2d, where they should be counted.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
872	David Knight	California Community Action Partnership Association	Outcome FNPI 1c. Add: Number of unemployed youth who obtained and maintained employment during the reporting period.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
873	David Knight	California Community Action Partnership Association	Outcome FNPI 1d. Add: Number of unemployed adults who obtained and maintained employment during the reporting period.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
874	David Knight	California Community Action Partnership Association	Outcome FNPI 1e. Add: Number of employed individuals who maintained employment during the reporting period.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
875	David Knight	California Community Action Partnership Association	Outcome FNPI 1f. Rewrite: Number of employed individuals who increased income from employment during the reporting period.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
876	David Knight	California Community Action Partnership Association	Outcome FNPI 2a. Enrollment in a program is not an outcome, therefore it should be removed. The outcome measuring the success of an early childhood program is “improved school readiness.” Suggestion: FNPI 2a. Number of children age 0 to 5 who achieve age-appropriate school readiness benchmarks.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
877	David Knight	California Community Action Partnership Association	Outcome FNPI 2b. Connection to a program is not an outcome, therefore it should be removed. The outcome for measuring the success of a program of this type is “improved skills” or “achieving at academic standards.” Suggested: FNPI 2b. Number of youth served by Community Action who achieve grade-level academic benchmarks.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
878	David Knight	California Community Action Partnership Association	Outcome FNPI 2e. Enrollment in a program is not an outcome, therefore it should be removed. The outcome of a post-secondary education program can be captured in FNPI 2f.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
879	David Knight	California Community Action Partnership Association	Outcome FNPI 3a. Completing training is not an outcome, therefore it should be removed. The outcome would be “improved financial well-being” or “maintaining a budget for 90 days.” These should be added back. Although numbers may be lower, these are key outcomes for the network.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
880	David Knight	California Community Action Partnership Association	Outcome FNPI 3c. It is questionable whether purchasing a home improves a person's ability to escape poverty. Further, this is a housing outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
881	David Knight	California Community Action Partnership Association	Outcome FNPI 4f. Being served by a program is not an outcome. The appropriate outcomes would be “avoided utility disconnection” and “established utilities.”	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
882	David Knight	California Community Action Partnership Association	Outcome FNPI 4g. Being served by a program is not an outcome. The appropriate outcomes would be “improved water safety” or “improved water quality.”	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
883	David Knight	California Community Action Partnership Association	Outcome FNPI 5a. The verbiage “preventative measures” is not an outcome, therefore this verbiage should be removed.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
884	David Knight	California Community Action Partnership Association	The use of the word “improve” in FNPI 5a and 5f could lead to inconsistency when doing reviews/audits of CAAs and the data required to support CSBG annual report outcomes. One state monitor could expect the CAA to produce data that shows physical and/or mental health improved for clients who were reported as achieving these outcomes, while another could not.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
885	David Knight	California Community Action Partnership Association	Outcome FNPI 5c. Receiving services is not an outcome. What is the problem that is being resolved?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
886	David Knight	California Community Action Partnership Association	Outcome FNPI 5d. Receiving services is not an outcome. The results of a service of this type can be communicated in FNPI 5a.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
887	David Knight	California Community Action Partnership Association	Outcome FNPI 5e. Receiving services is not an outcome. The appropriate outcome is “maintaining independence.”	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
888	David Knight	California Community Action Partnership Association	Outcome FNPI 5g. Receiving services is not an outcome. The appropriate outcome is “improved oral health.”	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
889	David Knight	California Community Action Partnership Association	Outcome FNPI 5h. Receiving services is not an outcome. The appropriate outcome is “improved oral health.”	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
890	David Knight	California Community Action Partnership Association	Outcome FNPI 5i. Receiving access to food is not an outcome. The appropriate outcome is “improved food security.”	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
891	David Knight	California Community Action Partnership Association	Demographics. Is “retired” not included in “Not in labor force?”	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
892	David Knight	California Community Action Partnership Association	Is it necessary to differentiate between “Two adults, no children” and “Multiple adults, no children” for the purposes of national reporting?	Request Change Not Accepted	This change expands scenarios with more than two adults in a household with and without children.
893	David Knight	California Community Action Partnership Association	The efforts to consolidate fields in the new CSBG Annual Report 3.0 are highly commendable. While we applaud the potential to improve data quality and reporting efficiency, we must also express concern about the possible implications of this streamlined approach. Our analysis suggests that while the new format effectively reduces complexity, it may inadvertently underrepresent the full spectrum of initiatives directed at eliminating the causes of poverty. By increasing the emphasis on poverty conditions, the report risks overshadowing the comprehensive efforts undertaken by Community Action Agencies to address	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
894	David Knight	California Community Action Partnership Association	The biggest concern towards creating a significant burden is that Annual Report 3.0 is attempting to place all data collection on a reporting schedule of October 1 to September 30. A clear understanding of what the Annual Report is attempting to explain must be established prior to this being a possibility. If the Annual Report is reporting a particular point in time count of expenditures, outcomes, and services, then a single time frame can be set for all states. If the Annual Report states “these are the accomplishments based on a specific federal fiscal year funding,” then setting a timeframe the same for all states will not be correct or will	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we’re using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
895	David Knight	California Community Action Partnership Association	Furthermore, changing a report year midway can be a significant burden for several reasons. First, it requires a thorough review and adjustment of all financial data and statements, which can be time-consuming and resource intensive. This process includes revisiting and updating financial records, reconciling accounts, and ensuring accuracy in the financial reporting process. Second, changing the report year may disrupt the comparison and analysis of data. Annual Reports are often used to evaluate the performance and trends of a CSBG Eligible Entity over time. Changing the report year midway can make it difficult to accurately compare	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
896	David Knight	California Community Action Partnership Association	The training cost associated with implementing a new report can be a significant burden. This will involve hiring trainers or consultants, developing training materials, scheduling, conducting training sessions, and providing ongoing support to agencies. All these activities require allocation of time, manpower, and budget, which can strain the resources of our Network that has already been operating underbudgeted for some time.Training costs will also escalate since the new report involves complex systems and technologies. Employees may need to be trained in new software, tools, or data analysis techniques. This could involve	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
897	David Knight	California Community Action Partnership Association	At a time when many agencies are facing difficulties with employee retention post-pandemic, there is the risk of employee resistance and heightened stress due to change. Some employees may be resistant to taking the time to learn new skills or adopting new reporting methods. Overcoming that resistance may require additional training resources and a shift in management efforts, further increasing the burden of training costs.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
898	David Knight	California Community Action Partnership Association	The Service to Outcome Plan implies that all outcomes and services are directly related, or that an agency delivers them directly in a vacuum. OCS needs to clearly identify their opinion on what constitutes an effected outcome. Often things like energy, food access, or rental assistance could determine an individual's ability to maintain a job. This is a common misunderstanding by policy makers that "getting a job" or "keeping a job" are not activities simply related to employment services. Often, even obtaining a job does not imply that families no longer require ongoing assistance to remain in the workforce.	Alternative Response	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job
899	David Knight	California Community Action Partnership Association	SRV 4d "The number of individuals who received utility payment assistance (to include deposits, arrears, and assistance)" is considered Concrete Support. Suggestion: why not associate SRV 4d with an FNPI of "avoid utility shutoff or had utility service restored"? There is a similar correlation with receiving rental assistance service and achieving the outcome of avoiding eviction.	Alternative Response	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements
900	David Knight	California Community Action Partnership Association	SRV 5q. "The number of individuals receiving prepared meals (e.g.: through a congregate nutrition site, Meals on Wheels, a prepared food delivery or pickup program)". What is the unit of measure for this SRV? In some cases, it can be difficult or impossible for the CAA to count individual, unique people who received prepared meals. For example, one CAA had a contract with their county to prepare congregate meals using the resources of a commercial kitchen and fresh produce from small farms and gardens; they provided the meals, and a different entity served them. They can count the number of meals but cannot count the unique	Alternative Response	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
901	David Knight	California Community Action Partnership Association	In CSBG 2.1 the instructions say to count all members of households for domain 4 (housing) SRV & FNPI. We recommend applying this same approach to all domains for simplicity & consistency, and because a strong argument can be made that when one person in a HH receives a service or achieves an outcome, all members of the HH benefit.	Alternative Response	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements
902	David Knight	California Community Action Partnership Association	[CSBG 2.1] The removal of the previous Module 2 - Staffing certifications; this is an opportunity for agencies to show their capacity.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
903	David Knight	California Community Action Partnership Association	[CSBG 2.1] The removal of FNPI 5d-5f is crucial because Parenting programs and senior programs are reported here.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
904	David Knight	California Community Action Partnership Association	[CSBG 2.1] The removal of the previous FNPI 7a - reporting individuals with multiple outcomes; this is a great way to share clients who get more than one service and helps the agency share success stories internally.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
905	David Knight	California Community Action Partnership Association	Using FFY is hard for agency systems and internal reports that are already set to calculating a calendar year. This shift will be a massive undertaking, and the sizeable time and monetary investment warrant further consideration by OCS.	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical
906	David Knight	California Community Action Partnership Association	Additionally, OCS should determine if they want a report of outcomes during the timeframe or want a report of the dollars allocated for that FFY.	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
907	David Knight	California Community Action Partnership Association	Many CalCAPA members share the concern that OCS rewrote the outcome-tracking rather than focusing time on rewriting manuals and providing training and technical assistance to state offices that oversee the data collection. This report overhaul comes across as a way to make up for the shortcomings of previous years' attempts to collect, compile, and communicate data from state offices into the federal report. This maneuver will punish agencies by forcing them to sacrifice resources and reliable reporting, ultimately shaping the data in a way to simplify the state office collectors and OCS processes, rather than to better tell	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
908	David Knight	California Community Action Partnership Association	Given the significant concerns raised with the proposed CSBG Annual Report Version 3.0 and the lack of comprehensive engagement with the Network, we ask that OCS consider clearing CSBG Annual Report Version 2.1 at this time and engage with the Community Action Network prior to the clearance of Version 3.0 in order to allow for a collaborative process that genuinely reduces burden while preserving the quality and integrity of the report.	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an
909	Georjean W. Trinkle	Community Action Partnership NJ (CAP NJ)	Regarding reorganizing the report, changing Module 3 (Community Level Change) to Module 4 seems unnecessary. The current Module 3 is a multi-year reporting measurement and changing the number from 3 to 4 appears superfluous. It may also yield confusion in the data collection and reporting in future years. This change may also impact the quality and clarity of information, and it seems unnecessary when Module 3 can remain. This change would require many revisions to training material in other areas. Training material referencing Module 3 bleeds into different areas, including data systems, organizational standards,	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
910	Georjean W. Trinkle	Community Action Partnership NJ (CAP NJ)	The need to phase in reporting requirements with this change is critical as many agencies do not currently report on a federal fiscal year. Changing all reporting to align with the federal fiscal year will eventually provide more helpful information, with the understanding that sufficient time to incorporate this information will occur over multiple years. Data provided in the reporting burden analysis also identifies the need for systematic reporting; requiring software can also yield reduced reporting burden and opportunities for multiple federal reporting systems to be able to share data outcomes, which continue to be a goal of	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical
911	Georjean W. Trinkle	Community Action Partnership NJ (CAP NJ)	An opportunity to learn about the changes and respond is helpful; it would be beneficial to intentionally engage the network as we continue to collaborate, share ideas and perspectives, leverage our viewpoints, and incorporate philosophies that yield a strong partnership. Working together with the network and those responsible for compiling the reporting can lead to a better understanding of the barriers to accurate reporting information and improve the overall product. Also, please consider consistent and ongoing training for accurate reporting on the final product and understanding the significant staff turnovers and changes that occur	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an
912	Georjean W. Trinkle	Community Action Partnership NJ (CAP NJ)	The nature of CSBG and its value is found in the multiple domains section, and eliminating this section reduces the quality and clarity of the information connected. Removing this option also reduces the ability to demonstrate the needs of low-income persons and the services and opportunities that can help them thrive. The information in this section also allows agencies to identify screening tools and services best suited to the population they serve, identify other gaps in services in their local communities, and help demonstrate the community's emerging needs. CSBG reporting, by nature, is designed to allow	Request Change Not Accepted	OCS acknowledges and appreciates this feedback. There are services in the current Services Supporting Multiple Domains (such as Child Care Subsidies/Payments, Day Centers, clothig assistance) that have been restructured into other domains. OCS reviewed the last five years worth of data submissions and technical requests and several of the services presented here were either underutilized or created a burden with capturing the correct unduplicated count. Therefore, OCS has removed them from the federal reporting requirement to minimize the collective

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
913	Georjean W. Trinkle	Community Action Partnership NJ (CAP NJ)	The proposed Service to Outcome Plan requires additional information before implementation. If reporting to an outcome is required when reporting a service, CAAs may not be able to include information critical to demonstrate the agency's results. The Service to Outcome Plan for the new Transportation Domain seems to be an activity; transportation, even mobility, is a critical factor in allowing poor individuals to access resources to end poverty. Sometimes, job opportunities, education, and even Head Start services are only available in certain areas. So, it makes sense that CAAs are providing transportation. Including transportation in	Alternative Response	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job
914	Georjean W. Trinkle	Community Action Partnership NJ (CAP NJ)	The SRVs and NPIs need updating. I hoped that when they were updated, the opportunity to tie these to the three National Goals would exist, providing a tangible link between services, activities, outcomes, and the network's mission. Some general comments along with the global comment that concrete support is not feasible to ensure accurate reporting:	Alternative Response	OCS acknowledges this comment appreciates the feedback. Upon OMB approval of the Annual Report 3.0, OCS will work to calibrating both its internal reporting requirements, external systems, and training and technical assistance for its grant recipients and subrecipients at the local level.
915	Georjean W. Trinkle	Community Action Partnership NJ (CAP NJ)	SRV 1d includes employment retention, but the FNPI 1c only applies to increased income.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
916	Georjean W. Trinkle	Community Action Partnership NJ (CAP NJ)	FNPI 2e: Would like to see (e.g., associate, bachelor, vocational)	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
917	Georjean W. Trinkle	Community Action Partnership NJ (CAP NJ)	For consistency purposes (global), when identifying services for youth and a separate duplicate service for adults, it would be more beneficial to list the youth SRV consistently and then the adult SRV (Ex, SRV 2k and SRV 2q) rather than sometimes having them grouped together and sometimes not.	Request Change Not Accepted	OCS acknowledges this comment and appreciates the feedback.
918	Georjean W. Trinkle	Community Action Partnership NJ (CAP NJ)	Also, many of the FNPIs are not outcome-based. For example, FNPI 2b: The number of youth actively connected to education and skills development programs.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
919	Georjean W. Trinkle	Community Action Partnership NJ (CAP NJ)	For privacy issues on data collection that could lead to additional information to improve data accuracy, combining SRV 5e and 5F to "the number of individuals with access to health coverage and health options" could increase data quality.	Request Change Not Accepted	OCS acknowledges this comment and appreciates the feedback.
920	Georjean W. Trinkle	Community Action Partnership NJ (CAP NJ)	FNPI 5g: The number of adults receiving preventative and oral health services (not all referrals may be for preventative), adding for all referrals to be included in data collection.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
921	Georjean W. Trinkle	Community Action Partnership NJ (CAP NJ)	Gray boxes are confusing; I hope OCS provides an additional public comment period before the final version is adopted.	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an
922	Georjean W. Trinkle	Community Action Partnership NJ (CAP NJ)	Several SRVs in Category 5 require additional FNPIs, for example, domestic violence, mental health services, and substance use disorder (please use language as per SAMSHA guidelines). Data must be collected when possible as research indicates poor and minority women are disproportionately affected and experience other adverse outcomes (NIH).	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
923	Georjean W. Trinkle	Community Action Partnership NJ (CAP NJ)	[SRV 5k] Several SRVs in Category 5 require additional FNPIs, for example, domestic violence, mental health services, and substance use disorder (please use language as per SAMSHA guidelines).	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
924	Georjean W. Trinkle	Community Action Partnership NJ (CAP NJ)	There is still an opportunity to identify food/hunger separate from nutritional outcomes.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
925	Georjean W. Trinkle	Community Action Partnership NJ (CAP NJ)	SRV 6a: Voter Education and Access services- language that includes other civic engagement, volunteerism, participating in elected or public meetings, speaking, assembling, etc., could increase data collection accuracy while maintaining the privacy of individuals who may not want to disclose their voting habits, voting registration efforts, or [text ends here]	Request Change Not Accepted	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
926	Georjean W. Trinkle	Community Action Partnership NJ (CAP NJ)	The use of "Z" is still confusing. While I understand the need to create some flexibility, I also know that having a streamlined, systematic approach to data collection by more than 1,000 agencies is more important, focusing on reducing poverty, revitalizing communities, and empowering individuals and families.	Alternative Response	OCS accepts this edit and has updated all FNPIs to include an 'other' with requirement of description.
927	Ann Sirois	Community Teamwork, Inc.	Removal of Module 2 B4 - We support this change. This was an extremely difficult measure to track, and we appreciate its removal.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
928	Ann Sirois	Community Teamwork, Inc.	Consolidation of Module 3 SRV 3m-3q - Recommend preserving these individual SRVs. Asset building, business development, and VITA are the most effective tools we have for fighting poverty. Consolidating these measures dilutes the story of concrete work being done to increase incomes and assets.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
929	Ann Sirois	Community Teamwork, Inc.	SRV 5r - Recommend including Grocery Gift Cards with other food services. Many organizations that do not provide direct food services distribute grocery gift cards. Gift cards have the benefit of allowing clients to purchase food that is appropriate for their culture and dietary restrictions, as well as to purchase diapers and hygiene items.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
930	Ann Sirois	Community Teamwork, Inc.	Removal of SRV 7c - Recommend maintaining these SRVs. Community Action Agencies serve as connectors and resource hubs in many communities. Removing Referrals and general Case Management services makes this function much less likely to be captured.	Request Change Not Accepted	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
931	Ann Sirois	Community Teamwork, Inc.	SRV 7f - Recommend clarifying if the "number of individuals receiving childcare subsidies" refers to the number of parents/guardians, children, or both.	Request Change Not Accepted	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
932	Ann Sirois	Community Teamwork, Inc.	Race/Ethnicity - Recommend aligning with upcoming census changes. It benefits agencies and those reviewing data when funders are aligned on reporting requirements. Historically, funders eventually align with the Census, so doing that now during this change would be appropriate.	Request Change Accepted	OCS has updated the race and ethnicity categories to align with the White Office of Management and Budget directive (SPD-15) on race and ethnic categories for federal reporting.
933	Ann Sirois	Community Teamwork, Inc.	Removal of D.13-D15 - We support this change. Many other data systems do not collect this data, making unduplicated reporting on these measures incomplete and often inaccurate.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
934	MDHHS-BCAEO <MDHHS-BCAEO@michigan.gov>	Michigan Department of Human Services	It stands to reason that the streamlined report, increased clarity and plain language, and reduced burden of data collection and reporting requirements will increase the quality of the information that is collected over time.For example, the alignment of individual and family services to individual and family national performance indicators (Attachment B-Service to Outcome Plan) is the clearest communication from OCS to date regarding the linkage between SRVs and FNPIs. Additionally, the addition of "concrete supports" provides a simple mechanism for reporting basic human needs. Simplifying and clarifying the relationship between	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
935	MDHHS-BCAEO <MDHHS-BCAEO@michigan.gov>	Michigan Department of Human Services	First, as detailed in Attachment C-Indicator Disposition Report, indicators have been removed, repurposed, revised, and merged throughout the report to eliminate redundancy and increase utility of the indicators that remain. Furthermore, the SRVs and FNPIs have been streamlined significantly which simplifies and clarifies data collection requirements.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
936	MDHHS-BCAEO <MDHHS-BCAEO@michigan.gov>	Michigan Department of Human Services	Second, the alignment of individual and family services with individual and family national performance indicators (Attachment B-Service to Outcome Plan) is the clearest communication from OCS to date regarding the linkage between SRVs and FNPIs. BCAEO appreciates the clarity and simplicity of approach outlined in this document. Additionally, the addition of "concrete supports" is useful and alleviates the burden of tracking longer-term outcomes that evidence demonstrates is very likely to be achieved by providing such services.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
937	MDHHS-BCAEO <MDHHS-BCAEO@michigan.gov>	Michigan Department of Human Services	Third, BCAEO appreciates the clear distinction OCS has noted during listening sessions between the federal data tracking and reporting requirements outlined in the CSBG Annual Report 3.0 and the data tracking and reporting options that states and local agencies continue to have available to them. The overwhelming majority of the SRVs and FNPIs that have been reported by Michigan's CAA network over the past two fiscal years will continue to be reported in the revised SRVs and FNPIs. In the rare instances where that is not the case, we will explore either a statewide indicator or agency- level indicator, which creates minimal	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
938	MDHHS-BCAEO <MDHHS-BCAEO@michigan.gov>	Michigan Department of Human Services	Fourth, BCAEO appreciates the increase of plain language, especially listing the population and/or unit of measurement for each indicator.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
939	MDHHS-BCAEO <MDHHS-BCAEO@michigan.gov>	Michigan Department of Human Services	Fifth, BCAEO appreciates the reorganization of the report, both within each module and the chronological reordering of the modules.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
940	MDHHS-BCAEO <MDHHS-BCAEO@michigan.gov>	Michigan Department of Human Services	Finally, while there will be some administrative burden created by the transition to 3.0, BCAEO agrees with OCS that "Over time the burden will decrease as systems are developed or modified and as staff gain experience with reporting and analysis." Furthermore, BCAEO acknowledges that providing ongoing training and technical assistance is a core function of BCAEO as the administrator of CSBG funding.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
941	MDHHS-BCAEO <MDHHS-BCAEO@michigan.gov>	Michigan Department of Human Services	The accuracy of the agency's estimate of the burden of the proposed collection of information.At the state level, 80 hours on average is low for the transition year(s) from 2.1 to 3.0. It may be realistic once all state staff and eligible entities are trained, and all systems are in place.	Alternative Response	OCS utilized the burden estimate formula developed for the current annual report and adjusted it based on the reductions and kept in mind there would be initial increases in burden to account for the changes during the periods where there is an overlap of 2.1 and 3.0 reports in FY26 (3.0 is optional in FY26 before becoming mandatory in FY27) but that it would adjust over time. It should be noted that burden estimates are largely estimates and the federal office through an incremental implementation intends to provide expansive technical assistance and
942	MDHHS-BCAEO <MDHHS-BCAEO@michigan.gov>	Michigan Department of Human Services	The streamlined, simplified approach the SRVs and FNPIs is appreciated. There is one instance where additional clarification would benefit the Michigan CAA network.In v2.1 many Michigan CAAs report using SRV 3o, which is a core service for several CAAs. On page 18 of Attachment C, it is stated that SRV 3o is "Merged" and that SRV 3o was "Streamlined to reduce burden and collect more concise data." In Attachment B-Service to Outcome Plan, page 4, tax programs, VITA, and EITC are not mentioned explicitly. Should VITA and other tax preparation services still be reported under SRV 3a or 3c, or should we explore a statewide indicator?	Request Change Accepted	OCS accepts this edit and has added VITA as a countable service for SRV 3a and will include this in the supplemental manual and training upon OMB approval.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
943	Elizabeth Steinberg	California Community Action Partnership Association	In the proposed changes, a number of critical reporting elements have been removed from the current document which limits our ability to show accountability	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
944	Elizabeth Steinberg	California Community Action Partnership Association	The current draft predominantly uses terms that emphasize outputs rather than outcomes. These indicators should be revised to reflect outcomes such as increased employment rates, improved living conditions, enhanced skill sets, and better access to critical services	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
945	Elizabeth Steinberg	California Community Action Partnership Association	By increasing the emphasis on poverty conditions, the report risks overshadowing the comprehensive efforts undertaken by community action agencies to address systemic issues.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
946	Elizabeth Steinberg	California Community Action Partnership Association	OCS has rewritten the outcomes rather than updating manuals and providing training and technical assistance to state offices that oversee the data collection	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
947	Elizabeth Steinberg	California Community Action Partnership Association	shifting the reporting year from the calendar year (JanuaryDecember) to the federal fiscal year (October-September) will require a significant transition in reporting which may initially result in incomplete data.	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
948	Rebecca Himlin	Community Action Pioneer Valley, Inc.	The Community Action network spent much time and energy working with OCS on the reporting framework several years ago, through a comprehensive consultation process. We know our programs, the various services and outcomes we need to track for our funders, and how to tell a compelling story about our work to the public and government audiences. The proposed major revisions to CSBG Annual Report 3.0, done in the absence of any prior consultation with the network and leaving only a 60-day comment period prior to submitting this to OMB, is a major concern that shows a lack of appreciation for the contribution of the network and	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
949	Rebecca Himlin	Community Action Pioneer Valley, Inc.	Reporting burden. If the goal is to reduce agencies' reporting burden, the proposed changes, particularly to the Services and NPIs in the current Module 4 (now proposed to be Module 3) will not do that—in fact they will have the opposite effect. Not only do the state agencies have to reconfigure their data collection systems, every single Community Action Agency that uses a database to capture program services and outcomes (at this point, that will be nearly all of them) will have to re-configure their data systems. It will cost each agency many thousands of dollars to pay our database vendors to make these changes...unanticipated	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
950	Rebecca Himlin	Community Action Pioneer Valley, Inc.	Many of the changes proposed to Module 4 (proposed Module 3) do not correctly distinguish between Services and Outcomes, showing a lack of understanding about the basic tenets of the ROMA framework (I will point out many of these in the following section). In addition, many important services and NPIs are simply eliminated, which removes key aspects of the work Community Action agencies do, meaning that decision-makers in government will not have a full picture of that great work. To maintain support for funding, it is critically important that they do. Currently, Community Action Agencies choose the appropriate Services and NPIs	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
951	Rebecca Himlin	Community Action Pioneer Valley, Inc.	Another key aspect of the ROMA framework is the recognition that different or multiple services could lead to a common outcome or the same service could result in more than one outcome. The framing OCS has included in the document, 'Service to Outcomes Plan,' matches only one service to one outcome, which is not always the case. I realize that this document was intended to make the changes easier to understand, but this shows an inherent misunderstanding of a key principle of ROMA.	Alternative Response	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job
952	Rebecca Himlin	Community Action Pioneer Valley, Inc.	There is a strong argument to keep the NPIs and Services in the current framework the same, rather than implementing the sweeping changes proposed, from the perspective of being able to compare results over time. Using the same indicators and definitions facilitates good management and reflective practice, because we can review and compare performance over time. Consolidating several NPIs into one means that we'll be unable to compare 'apples to apples,' so to speak, and won't have the capacity to learn from trends in the data.	Alternative Response	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements
953	Rebecca Himlin	Community Action Pioneer Valley, Inc.	We need to keep CURRENT 1a and 1b language that refers to adults and youth who obtain employment— it is a really important outcome to identify whether someone actually became employed with our assistance, and it is also important to continue to distinguish between youth and adults.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
954	Rebecca Himlin	Community Action Pioneer Valley, Inc.	The change I agree with is to dispense with the 'living wage' distinction, as the methodology for determining a living wage is not standardized and therefore the meaning of the aggregated data is obscured.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
955	Rebecca Himlin	Community Action Pioneer Valley, Inc.	It is fine to add the proposed 'number of unemployed youth who increased skills to obtain employment' and 'number of unemployed adults who increased skills to obtain employment' for those agencies that want to track this.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
956	Rebecca Himlin	Community Action Pioneer Valley, Inc.	The proposed: "1c. Number of employed individuals who increased income from employment through a wage or salary amount" does not make sense without context. This indicator in the current framework is about people who are already employed and are looking to advance their careers. In the proposed language, is this supposed to include both unemployed and employed people who increased their income in any way—by getting a job OR a better job? This is unclear. The current framework, with the set of NPIs that clearly refers to career advancement, is clear and should be retained.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
957	Rebecca Himlin	Community Action Pioneer Valley, Inc.	We are losing a great deal of information by the proposed collapsing of the current categories. In addition, we WILL have to pay to re-configure/re-map the existing services we are tracking that are supposed to go into these new categories, AND re-train staff. I think losing distinguishing information about apprenticeship/internship placement, job placement services, vocational training, and on-the-job and other work experience would be unfortunate. These services need to be retained as separate options.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
958	Rebecca Himlin	Community Action Pioneer Valley, Inc.	Proposed SRV 1c Employment supplies -- this is a perfect example of a Concrete Support and should be noted as such, as per the other domains.	Request Change Not Accepted	OCS appreciates this feedback. Concrete community supports are defined as social services that meet the basic needs of individuals and families related to food, water, shelter, safety, and/or health care.
959	Rebecca Himlin	Community Action Pioneer Valley, Inc.	losing the specificity of the indicators is a problem. Essentially, I think almost all of the proposed changes/omissions in this section are problematic. In this section, the "outcomes" proposed are actually almost all outputs or services.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
960	Rebecca Himlin	Community Action Pioneer Valley, Inc.	Proposed 2a.: being enrolled in childcare or early childhood education services is NOT an OUTCOME—this is a SERVICE. The existing outcomes ARE measured by our early education programs through actual assessments—"demonstrated improved emergent literacy skills" "demonstrated skills for school readiness," "achieving at basic grade level"—all of these are true OUTCOMES and all of these options need to be retained.	Request Change Not Accepted	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
961	Rebecca Himlin	Community Action Pioneer Valley, Inc.	The proposed language around 2c. obtaining a high school degree/equivalency and 2f. obtaining a post-secondary degree (collapsing Associates and Bachelor's) seems fine and workable.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
962	Rebecca Himlin	Community Action Pioneer Valley, Inc.	I am also OK with adding the option of 2.e. enrolling in a post-secondary degree program.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
963	Rebecca Himlin	Community Action Pioneer Valley, Inc.	The proposed language around 2c. obtaining a high school degree/equivalency and 2f. obtaining a post-secondary degree (collapsing Associates and Bachelor's) seems fine and workable.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
964	Rebecca Himlin	Community Action Pioneer Valley, Inc.	2d. The number of individuals who obtained a recognized credential, certificate, or degree relating to the achievement of educational or vocational skills should be clearly limited to vocational/occupational skills programs so that this one is clearly distinguished from other credentials already mentioned (remove 'degree' and replace 'educational' with 'occupational'	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
965	Rebecca Himlin	Community Action Pioneer Valley, Inc.	Childcare/ Early Childhood/Young Adult Education Services. Proposed "2f: Young adult literacy classes"—why is this limited to young adults? Early literacy programs are left out of the list of services and they are important and should remain as a separate service. I do think it is useful to include the service: 'Number of individuals receiving childcare subsidies' in this section (it is currently in the Services Supporting Multiple Domains category).	Request Change Not Accepted	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements
966	Rebecca Himlin	Community Action Pioneer Valley, Inc.	We need to keep the service for Leadership Training under Youth Programs, which is an important part of the work of our agency and many others. The proposed "2k Life Skills and Coaching services" is not the same thing, but this could be an additional option.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
967	Rebecca Himlin	Community Action Pioneer Valley, Inc.	I do think that Life Skills and Coaching is MUCH better language than 'Behavior Improvement' programs, which has a judgmental connotation and I support that language being removed.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
968	Rebecca Himlin	Community Action Pioneer Valley, Inc.	2n. Basic education classes": financial literacy is NOT the same as basic education, should not be listed as an example here. I think that Financial Literacy Education belongs in the Income/Asset Development section ONLY and not in this section. It is confusing in the current framework that it is in two different Domains	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
969	Rebecca Himlin	Community Action Pioneer Valley, Inc.	We must keep Parenting Education as an option here! (in the current framework, 2w says "Parenting Supports," but I think it should be changed to Parenting Education specifically in this section). The proposed plan removes this. Parenting Education is a CRITICAL part of Head Start as well as other Family Support programs and we need to reflect this service! This is completely different from 'Life Skills and Coaching" which could be an additional option to add.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
970	Rebecca Himlin	Community Action Pioneer Valley, Inc.	We should keep the services that are in the current framework: 2aa. Post-Secondary Supports, and 2bb Financial Aid Assistance.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
971	Rebecca Himlin	Community Action Pioneer Valley, Inc.	Taking out the current '3h. increased their net worth' indicator is acceptable. I don't think this has been properly defined and data collection to figure this out would definitely be burdensome	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
972	Rebecca Himlin	Community Action Pioneer Valley, Inc.	I also think that removing the indicator on 'meeting basic needs for 180 days' is a good idea, as I think this timeframe is excessive and creates an unnecessary burden.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
973	Rebecca Himlin	Community Action Pioneer Valley, Inc.	We should retain the one referring to 'meeting basic needs for 90 days.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
974	Rebecca Himlin	Community Action Pioneer Valley, Inc.	It is very important to retain the other indicators in our current framework, including 'increased their savings,' 'purchased an asset,' 'improved their credit scores,' and 'report improved financial well-being.' These are real outcomes and important ones. It is not sufficient that all asset development work is represented simply by 'individuals who opening a savings account' and 'individuals who purchased a home.'	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
975	Rebecca Himlin	Community Action Pioneer Valley, Inc.	I would support adding an indicator related to completing income and asset building training, similar to what is proposed—I do think that could be an important outcome. However, the proposed language is not outcome-focused enough—my suggestion would be 'increased their financial capability, knowledge, and skills through income and asset building training.' This shows that we actually need to measure a change, and that is what outcomes are all about.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
976	Rebecca Himlin	Community Action Pioneer Valley, Inc.	many Community Action Agencies operate a Volunteer Income Tax Assistance (VITA) program, and no outcomes in the current or proposed framework sufficiently reflect this. In our state (Massachusetts), we have an 'Other' NPI with the outcome "individuals who increased their income due to a tax credit," which we think is a true outcome that is relevant for many CAAs across the country.	Request Change Accepted	OCS accepts this edit and has added VITA as a countable service for SRV 3a and will include this in the supplemental manual and training upon OMB approval.
977	Rebecca Himlin	Community Action Pioneer Valley, Inc.	Instead of lumping it in with a general Benefit Coordination service, I feel that SNAP Application Assistance should specifically be an option in the Health/Soc Behavioral Domain as a service, and that it be related to a new NPI on 'improving food security'—this is a real outcome relevant to a variety of common CAA programs/services.	Request Change Not Accepted	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements
978	Rebecca Himlin	Community Action Pioneer Valley, Inc.	support with Health Insurance Application Support/Navigation should be in the Health domain and relate to a new NPI on 'number of individuals who obtained health insurance.'	Request Change Not Accepted	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
979	Rebecca Himlin	Community Action Pioneer Valley, Inc.	I question why 'receiving transportation services' would be separately listed in this section. This is truly a cross-cutting service, potentially important to the Employment, Education, or Health domains as well as Income/Asset Development. In my view, transportation services are best left in the Services Supporting Multiple Domains, as in the current framework.	Request Change Not Accepted	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements
980	Rebecca Himlin	Community Action Pioneer Valley, Inc.	the proposed '4f. The number of individuals served with energy assistance and/or energy efficiency homes' simply does nothing to improve upon the existing '4h. The number of individuals with improved energy efficiency and or energy burden reduction in their homes.' The proposed new language is not well phrased and simply refers to receiving services.	Alternative Response	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements
981	Rebecca Himlin	Community Action Pioneer Valley, Inc.	Proposed '4g. The number of individuals served with improved water safety' is not clear or stated as an outcome. You could say 'experienced increased water quality and/or security.' This should be more clearly defined—I assume you mean through water/sewer payment assistance and/or water quality interventions like de-leading pipes. These and other interventions could result in this outcome.	Alternative Response	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements
982	Rebecca Himlin	Community Action Pioneer Valley, Inc.	Also, the framework should include a new indicator related to the fuel assistance program, which does relate to an outcome of increased housing stability and health and safety. It is not currently in either the current or proposed framework. The outcome could be: '...Experienced improved home safety through maintaining adequate heating and/or cooling." In Massachusetts, we ALSO have 'Other' NPIs for 'avoided a utility shut-off' and "restored heat/utility service"—both of which are extremely important outcomes not reflected in the national framework, though many Community Action Agencies do this work!	Request Change Not Accepted	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements
983	Rebecca Himlin	Community Action Pioneer Valley, Inc.	One change I would recommend is moving the NPI related to 'Maintaining an independent living situation' to the HOUSING domain, not the Health/Social Behavioral one, as is the case in the current framework. This NPI is currently completely left off of the proposed framework, which is a problem. I would not object if the NPI 'Number of seniors who maintained an independent living situation' was combined with the outcome 'Number of individuals with disabilities who maintained an independent living situation' to read: 'Number of seniors and individuals with disabilities who maintained an independent living situation.'	Request Change Not Accepted	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements
984	Rebecca Himlin	Community Action Pioneer Valley, Inc.	Landlord/tenant education' is very different from 'Eviction counseling and mediation.' We should retain a separate service for 'Landlord/tenant education.'	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
985	Rebecca Himlin	Community Action Pioneer Valley, Inc.	'Permanent housing placement' is important to keep separate! This should be available to relate to the outcome of obtaining housing! Also, it should be clear that temporary placement includes emergency shelter.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
986	Rebecca Himlin	Community Action Pioneer Valley, Inc.	Utility Payments should continue to be separate from Utility Arrears Payments or Utility Deposits, as this specificity is important to clearly represent the value of our work in this area. Note: the last two relate directly to outcomes (from our statewide framework) I have proposed above: 'avoided a utility shut-off' and 'restored heat and/or utility service.'	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
987	Carl Shirley	Hampton Roads Community Action Program, Inc.	FNPI 1a – the revision is not clear. Does it strictly measure skill or employment due to increased skill? Shouldn't employment be the measure of programmatic success?	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
988	Carl Shirley	Hampton Roads Community Action Program, Inc.	FNPI 1b – the revision is not clear. Does it strictly measure skill or employment due to increased skill? Shouldn't employment be the measure of programmatic success?	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
989	Carl Shirley	Hampton Roads Community Action Program, Inc.	FNPI 1e – The number of unemployed adults who obtained employment (living wage or higher) is a necessary measure of the success of employment programs.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
990	Carl Shirley	Hampton Roads Community Action Program, Inc.	FNPI 2d – The number of children or youth who are achieving at a basic grade level is an important measure of the success of educational programming.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
991	Carl Shirley	Hampton Roads Community Action Program, Inc.	FNPI 5i—This indicator is an important measure of the success of programs that transition ex-offenders back into their communities. However, there is no need to differentiate between adult and youth participants.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
992	Carl Shirley	Hampton Roads Community Action Program, Inc.	SRV 1b—Details are lost, packing all of these services into a single indicator. I'm not sure how the data is made more concise this way.	Request Change Not Accepted	OCS acknowledges this comment. The report revisions were to ensure we addressed the expansive nature of performance measures across CSBG while meeting the requirements of the CSBG Act, the findings of the CSBG Government Accountability Office (GAO) report, and minimize the burden on the public under the Paperwork Reduction Act. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use.
993	Carl Shirley	Hampton Roads Community Action Program, Inc.	SRV 3a and 3f—Details are lost, packing all of these services into a single indicator. I'm not sure how the data is made more concise this way.	Request Change Not Accepted	OCS acknowledges this comment. The report revisions were to ensure we addressed the expansive nature of performance measures across CSBG while meeting the requirements of the CSBG Act, the findings of the CSBG Government Accountability Office (GAO) report, and minimize the burden on the public under the Paperwork Reduction Act. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use.
994	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	Current Language: "FNPI 2a The number of children (0 to 5) who demonstrated improved emergent literacy skills."Proposed Change in Language: "FNPI 2a. The number of young children (0-5) enrolled in childcare or early childhood education services."Suggestion for revised wording: "FNPI 2a. The number of young children (0-5) enrolled in childcare or early childhood education services who are achieving developmental milestones."	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
995	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	Current Language: "FNPI 2b The number of children (0 to 5) who demonstrated skills for school readiness. "Proposed Change in Language: "FNPI 2b. The number of youth actively connected to education and skills development programs. "Suggestion for revised wording: "FNPI 2b. The number of youth actively connected to education and skills development programs who are achieving academic and/or developmental milestones. "	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
996	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	Current Language: "FNPI 3a The number of individuals who achieved and maintained capacity to meet basic needs for 90 days. "Proposed Change in Language: "FNPI 3a. The number of individuals completing income and asset building training. "Suggestion for revised wording: "FNPI 3a. The number of individuals completing income and asset building training, who improved knowledge and/or skills. "	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
997	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	Current Language: "FNPI 4h The number of individuals with improved energy efficiency and/or energy burden reduction in their homes. "Proposed Change in Language: "Becomes FNPI 4f. The number of individuals served with energy assistance or energy efficiency homes. "Suggestion for revised wording: "Retain as is "	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
998	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	Current Language: "Becomes FNPI 5c. The number of individuals receiving reproductive services. "Proposed Change in Language: "Number of individuals who have improved skills and/or knowledge related to reproductive health. Number of individuals who have improved skills and/or knowledge related to maternal/child health. "	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
999	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	Current Language: "Becomes FNPI 5d. The number of individuals receiving wellness services. "Proposed Change in Language: "Number of individuals who obtain or maintain wellness. "	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1000	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	Current Language: "Becomes FNPI 5e. The number of older adults (age 65+) receiving home visiting services. "Proposed Change in Language: "Retain AR 2.0 FNPI 5f: Number of older adults who maintained independent living situation "	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1001	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	Current Language: "Becomes FNPI 5g. The number of adults receiving preventative oral health services. "Proposed Change in Language: "Number of adults who maintain oral health. "	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1002	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	Current Language: "Becomes FNPI 5h. The number of children receiving preventative oral health services. "Proposed Change in Language: "Number of children who maintain oral health. "	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1003	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	Concern: Identifying “access” as a change in status at the family level. The two items identified below are of particular importance to reconsider as they include the concept of access to something (food, jobs, housing) being an outcome. The Annual Report must maintain clarity about “access.” When you drill down to the need and the actual outcome, it is not the increased access that is important at the family level – but rather having access is a community level issue. Do individuals and families have food? Jobs? Housing? That is the question, not whether they have access to those things. Just having access does not indicate a change in	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
1004	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	Concern: Identifying “access” as a change in status at the family level. The two items identified below are of particular importance to reconsider as they include the concept of access to something (food, jobs, housing) being an outcome. The Annual Report must maintain clarity about “access.” When you drill down to the need and the actual outcome, it is not the increased access that is important at the family level – but rather having access is a community level issue. Do individuals and families have food? Jobs? Housing? That is the question, not whether they have access to those things. Just having access does not indicate a change in	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
1005	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	The items identified below are indicators that reflect important activities in which many agencies are engaged and should be retained. Current Language: "FNPI 1b. The number of unemployed adults who obtained employment (up to a living wage). "Suggestion for revised wording "The number of unemployed adults who obtained employment. "	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1006	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	The items identified below are indicators that reflect important activities in which many agencies are engaged and should be retained. Current Language: "FNPI 1c The number of unemployed adults who obtained and maintained employment for at least 90 days (up to a living wage). "Suggestion for revised wording "The number of employed adults who maintained employment for at least 90 days. "	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1007	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	The items identified below are indicators that reflect important activities in which many agencies are engaged and should be retained. Current Language: "FNPI 2f The number of adults who demonstrated improved basic education. "Suggestion for revised wording "The number of adults who improved basic education (reading, math) and/or English language skills. "	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1008	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	The items identified below are indicators that reflect important activities in which many agencies are engaged and should be retained. Current Language: "FNPI 3d The number of individuals who increased their savings. "Suggestion for revised wording "The number of individuals who opened or added to a savings account (or other saving instrument such as a IDA). "	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1009	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	The items identified below are indicators that reflect important activities in which many agencies are engaged and should be retained. Current Language: "FNPI 3e.1 Of the above, the number of individuals who purchased a home. "Suggestion for revised wording "The number of individuals who purchased or refinanced a home. "	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1010	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	The items identified below are indicators that reflect important activities in which many agencies are engaged and should be retained. Current Language: "FNPI 5d The number of individuals who improved skills related to the adult role of parents/ caregivers. "Suggestion for revised wording "Retain "	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1011	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	The items identified below are indicators that reflect important activities in which many agencies are engaged and should be retained. Current Language: "FNPI 5f The number of seniors (65+) who maintained an independent living situation. "Suggestion for revised wording "Retain "	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1012	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	The items identified below are indicators that reflect important activities in which many agencies are engaged and should be retained. Current Language: "FNPI 5g The number of individuals with disabilities who maintained an independent living situation. "Suggestion for revised wording "Retain "	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1013	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	Concern: Removal of data element regarding Income Source One of the data elements that allows us to clearly identify the population served is that of Income Source in Household Demographics. Knowing the percent of Community Action customers who are working, for example, can help to dispel myths about them. Knowing a large percent of an agency's population is receiving social security income can guide decisions about the services to be provided. Suggestion: retain this data element.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1014	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	Item 3: Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies. In the proposed changes, the Community Level information is designated as "optional." This appears not to acknowledge the purposes of the CSBG funding legislation that includes community level goals. (112 STAT. 2728 PUBLIC LAW 105–285—OCT. 27, 1998, 42 USC 9901. "SEC. 672. PURPOSES AND GOALS. ...for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-	Request Change Not Accepted	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1015	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	Item 4: Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies. Because of the foundational principle that each local CAA will be responsive to the needs assessed that are unique to the community it serves, there will be impacts that are not a part of the standard set of Indicators identified in the FNPIs. Currently an agency with an impact that is not identified can add that to the FNPI report using the indicators labeled as "z" in each section. This option is being proposed for elimination in 3.0. Loss of this option will limit the ability of the network to identify	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an 'other' with requirement of description.
1016	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	Item 5: Does the information to be collected produce significant burden? A factor to weigh about information collection related to the Annual Report is that burden is limited by the understanding that agencies are only reporting on the items that reflect their actual work, not the full menu of items included in the report. Reducing the total number of items in the report may not impact in any way the number of items that an individual agency is including in their report, so burden may not be reduced at all. While the addition of a Transportation domain to the list of possible domains for which information will be collected is welcomed, the	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
1017	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	Item 6: Clarity of information – this is a series of comments regarding the SRV items proposed. I have included my concerns in each item and a suggested change. 1 – Question the wording of revision SRV 2n. The number of individuals attending basic education classes (e.g.: financial literacy). This should say "adults," (not "individuals") as basic education for children is captured elsewhere. Financial capacity training is captured SRV 3a so referring to it here is confusing (could lead to duplication) and not appropriate as financial literacy is not considered to be "basic". Suggested change: SRV 2n. The number of adults attending basic	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
1018	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	Item 6: Clarity of information – this is a series of comments regarding the SRV items proposed. I have included my concerns in each item and a suggested change. 2 - Question the removal of SRV 2w Parenting Supports. This is an important aspect of many programs provided by CAAs (Head Start, 2 Generation). If it must be included with another item it might be added to the item moved from 5ll. Becomes SRV 2q. The number of adults receiving life skills and coaching services. While "Parenting Supports" are much broader than "parenting skills training," While parenting skills are not routinely included with life skills (as life	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1019	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	3 – Removal of SRV7a – Case Management. Suggestion: Retain this item. Generic "case management" service are provided in "2 Generation" or "whole family" or "bundled services" approaches where services cover more than one domain area. There is evidence that these approaches involving multiple domains are effective in achieving improved outcomes for individuals and families, so the loss of this item will reduce the ability of the network to demonstrate how their activities produce results.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1020	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	4 - Removal of SRV7c – Referrals. Suggestion: retain this item. If removed, suggest guidance be provided for whare referrals are to be counted. If they are to be counted the same as services actually provided by the agency itself, this may cause confusion, but the loss of referral information will reduce the agency's ability to document its work.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1021	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	5 - Assure consistency in identifying the “unit” – there are “individual” and “adult” and “children” and “youth” and those are all appropriate for the different kinds of services. But there is both “older adults” and “seniors” – use of either one of these terms throughout would reduce confusion. Two items say “people”- should be “individuals.” One item says “families” and one says “households” – are these intended to have two different meanings or could one word be used for both? And should these actually be “individuals” to remain consistent in what is being counted in this section? Finaly two items identify the things that are distributed	Request Change Not Accepted	OCS accepts this change and has revised the indicators. OCS notes all service counts are no longer based solely on the number of individuals served but are flexible for different units of measurement.
1022	Barbara J. Mooney	Association of Nationally Certified ROMA Trainers, Implementers, Advocates	Item 7: Clarity of information - The Services to Outcome Plan must include recognition of a wider interpretation of the relationship between services and outcomes. In its current form, it implies that there is a one to one relationship between service and outcome.	Alternative Response	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job
1023	New York State Department of State (DOS) Division of Community Services (DCS)	New York State Department of State	As presented in the 2024-2025 CSBG State Plan for New York State, DOS has been working to streamline processes, alleviate the administrative burden, and reduce redundancies for CSBG State staff and CSBG eligible entities. DOS appreciates the intent to reduce the redundancies and consolidate the multiple points in data collection that have been proposed in the revisions to the Annual Report (version 3.0). The community action network, as a whole, is struggling to hire and retain staff, by providing a condensed version of the Annual Report, it should reduce the amount of time to enter information and complete the report. However, the	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
1024	New York State Department of State Division of Community Services	New York State Department of State	The CAA Network develops their CSBG Community Action Plans around the National Performance Indicators and Service Codes. The proposed elimination of services and indicators may compromise the quality and depth of the overall report and limit the story telling of the CAA Network, which is vital to the history of addressing the causes and condition of poverty. Historically, by providing a plethora of options, the Annual Report has allowed the CAA Network to be creative with program and service implementation. In addition, clarity should be provided on the Services to Outcome Plan, as it is unclear if the service being reported on	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1025	New York State Department of State Division of Community Services	New York State Department of State	DOS strongly supports the addition of the Transportation Domain. The presence of the Transportation Domain brings recognition to the forefront and affirms the critical impact that transportation has on accessing vital services for low-income populations.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1026	New York State Department of State Division of Community Services	New York State Department of State	Furthermore, DOS supports the comments and feedback submitted by the New York Community Action Association (NYSCAA). DOS encourages that the Office of Community Services (OCS) consider a clearing process for the current Annual Report (version 2.1) and provided training and technical support for the transition to the revised CSBG Annual Report (version 3.0). State offices need adequate time, from one version of the Annual Report to the next version, to provide training and technical assistance to the CAA Network and the State Administration Office staff.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1027	Tamara Fahey	Massachusetts Department of Housing and Community Development	Sequence of Module 3 to Module 4 and reordering Sections within. Although a seemingly simple change to the order of the report, the proposed changes create a huge and unnecessary cost and time burden for our office and our CAAs. The proposed changes would require us to update references to each Module and Section throughout multiple software systems, guidance documents, training recordings, and other materials currently in place. In Massachusetts, our Community Action Plan is designed to accommodate reporting requirements of the CSBG Annual Report, including built in service, strategy, and outcome	Alternative Response	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
1028	Tamara Fahey	Massachusetts Department of Housing and Community Development	Eliminating the 'Services Supporting Multiple Domains' expenditure domain. In FY23, more than two thirds of Massachusetts CAAs reported spending on programs falling under Services Supporting Multiple Domains. We know from our network Community Action Plans that the primary purpose of nearly all programs reported under this domain was to conduct inter-agency service coordination (i.e. customer service centers, central intake/assessment, case management, etc.) More than any other expenditure domain, this has allowed CSBG funded agencies to tell the story of how they serve clients in a holistic manner, connecting them to	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1029	Tamara Fahey	Massachusetts Department of Housing and Community Development	Changes to Individual and Family Level Services List. While we generally agree with reducing the amount of Services listed in the current Module 4 – Individual Family Level section of the report, the approach of merging together multiple services proposed in Version 3.0 will create a significant cost and time burden for our office and our CAAs. Since our network built its systems to accommodate Annual Report requirements at many levels, the proposed changes will require CAAs modify their case management systems, and our office to modify our Community Action Plan and CSBG Annual Report systems to change the naming convention throughout.	Request Change Not Accepted	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
1030	Noelia McNew	New Mexico Association of Community Partners	Overall, I feel that most of the changes are positive and will actually reduce the burden of reporting on CAAs. Particularly the removal of reporting on Organizational Standards compliance. This will reduce the amount of time CAAs spend updating document databases at the same time as they are analyzing data for the Annual Report. I believe that this will result in more accurate reporting on compliance as it will allow State CSBG staff and CAA staff to work without the pressure of a deadline to provide documentation and confirm compliance.	Alternative Response	OCS appreciates this feedback and notes this was repurposed and the requirement to track this will still be monitored by the federal office between state agencies but the annual capture in this report will no longer be as its written. Strongly recommend local agencies continue to check the CSBG Policy and Guidance website once the Annual Report 3.0 is approved for updated policy and guidance to clarify.
1031	Noelia McNew	New Mexico Association of Community Partners	There are two main changes that concern me. The first is the elimination of "Z" Indicators. Several of our agencies utilize the option in their Annual Reports to document unique indicators met by services provided. Keeping this indicator in the Annual report will not practically reduce the burden on the CAAs, so could be left in without much impact.	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an 'other' with requirement of description.
1032	Noelia McNew	New Mexico Association of Community Partners	The second change that concerns me is the Integration of Outputs within the Family & Individual Performance Outcomes. As a certified ROMA trainer I am concerned about the blurring of the line between outputs and outcomes and their level of importance. One of the main principles emphasized in ROMA training and a core philosophy of Community Action is the emphasis placed on documented change made in a family's or individual's life. This change in the Annual Report could serve to de-emphasize these principles and take focus away from reporting outcomes. I would hope that this will be taken into consideration when making	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1033	MASSCAP	Massachusetts Association for Community Action	After a series of feedback sessions and in collaboration with our 23 CAAs in Massachusetts and our CSBG state agency, we at MASSCAP, as the State Association, urge the clearance of the proposed 2.1 version of the CSBG Annual Report. We also encourage OCS to engage in a more collaborative process with the Community Action network before clearing version 3.0 of the report. We all agree with and will benefit from an edited version of the CSBG Annual Report, and appreciate OCS starting this process, but believe that the best version of the edited report will come from an inclusive process of gathering and integrating	Alternative Response	On June 28, OCS released a Dear Colleague Letter announcing the processing for the final 30 days on Annual Report 2.1, the Tribal Annual Report, and Tribal Short Form while we continue to reconcile the comments submitted on Annual Report 3.0. Once all comments have been reconciled, ACF will prepare Annual Report 3.0 for final comment and OMB approval.
1034	MASSCAP	Massachusetts Association for Community Action	Deduplicated counts will be nearly impossible and burdensome because of the variety of data systems agencies use, and the nature of service provision in many programs. This will likely lead to the reported numbers served being decreased, which has the potential to underestimate the scope of clients served & hurt funding in the long run. Finding a simple and accurate way to get deduplicated counts has long been a goal of Community Action Agencies. Unfortunately, due to the complicated patchwork of data entry systems, casework software, and a lack of data bridges, we have yet to find a workable way to get accurate deduplicated	Alternative Response	OCS acknowledges this comment. For FNPIs, Annual Report 2.1 asked for unduplicated counts of individuals reporting outcomes, so there should be no change to the burden associated with collecting this information. For SRVs, notes all service counts are no longer based solely on the number of unduplicated individuals served but are flexible for different units of measurement. For example, the column for Transportation (SRV 7) now reads Unduplicated Number Served so the unit of measurement would be the voucher, pass, card, ride, or form of assistance. OCS will release
1035	MASSCAP	Massachusetts Association for Community Action	Multi-Domain NPIs are necessary to tell the story of community action as so many services build on each other and don't have a simple one-to-one outcome (i.e. case management, financial counselling, etc.) This minimizes the focus on service integration, which is an essential part of service delivery at CAAs. •One of the things that make Community Action Agencies so unique in terms of fighting poverty is the fact that they offer a large array of services and programs aimed at addressing not only the results, but the root causes of poverty. One of the agency Executive Directors in Massachusetts aptly refers to CAAs as "the Swiss Army Knife"	Alternative Response	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job
1036	MASSCAP	Massachusetts Association for Community Action	Collapsing and removing NPIs will not actually reduce the burden or amount of work that goes in to collecting the data, it will simply remove the nuances and scope of work done by agencies, thereby minimizing the impact of this report and limit its ability to express the full scope and scale of the work CAAs do at the individual, family and community level to address the root causes of poverty. Everyone involved in the CSBG Annual Report process is aware of the length, complexity, and time commitment it entails, and we appreciate any consideration to lessen the burden of the report. The concern is that the proposed change that	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1037	MASSCAP	Massachusetts Association for Community Action	In Massachusetts, there are four main service areas that would not be reportable in the proposed 3.0 version of the CSBG Annual Report: VITA/EITC/other Tax Preparation programs, case management, eligibility determinations, and referrals. In terms of the tax-preparation services, the VITA program acts as the point of entry for many customers across the state. They come in to have their taxes prepared, only to realize that they are eligible for fuel assistance, weatherization, food assistance, and many other services. Once they have a foot in the door at an agency, they can benefit from wraparound services that CAAs are uniquely	Request Change Accepted	OCS has added VITA as a countable service for SRV 3a and will include this in the supplemental manual and training upon OMB approval. OCS has updated all FNPIs to include an 'other' with requirement of description. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency (subrecipient), state, tribe, or territory (grant recipient) from collecting the information for their specific needs.
1038	Mark Sewell	Washington County Community Action Council Inc.	The Office of Community Services (OCS) should proactively adopt and utilize the proposed CSBG Annual Report 2.1 as a foundation for engaging with the Community Action Network in a deliberate and strategic fashion prior to finalizing the revised CSBG Annual Report 3.0. This approach ensures that the ultimate, approved report authentically captures the needs, realities, and insights of the Network and, more specifically, our agency. By maintaining a seamless transition from the existing reporting framework while actively enhancing proposed modifications, we can enhance the impact not only for our agency but for the	Alternative Response	On June 28, OCS released a Dear Colleague Letter announcing the processing for the final 30 days on Annual Report 2.1, the Tribal Annual Report, and Tribal Short Form while we continue to reconcile the comments submitted on Annual Report 3.0. Once all comments have been reconciled, ACF will prepare Annual Report 3.0 for final comment and OMB approval.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1039	Mark Sewell	Washington County Community Action Council Inc.	It is absolutely critical to ensure that the updated CSBG Annual Report is in complete alignment with the ROMA framework, particularly emphasizing our commitment to results-oriented practices, in order to facilitate ongoing enhancements in service delivery and outcomes. It is essential that our reporting mechanism enables us to track and document outcomes as tangible progress indicators resulting from the outputs and interventions implemented by our agency. This approach is crucial for demonstrating how our efforts contribute to clients attaining self-sufficiency and for maintaining a clear focus on continuous	Alternative Response	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements
1040	Mark Sewell	Washington County Community Action Council Inc.	The removal of Services Supporting Multiple Domains means that several key, cross-cutting services have been removed from the proposed report, including: Case Management (current SRV 7a). Services, such as transportation, have been moved into other domains. The Washington County Community Action Council will need to determine how to handle reporting costs associated with cross cutting or holistic services typically contained in this domain.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1041	Mark Sewell	Washington County Community Action Council Inc.	The incorporation of crosscutting services within this domain is vital to upholding the comprehensive approach of The Washington County Community Action Council. Their exclusion significantly diminishes our ability to fully showcase the extensive impact and scope of our services, as well as the effectiveness of CSBG funding. The absence of these essential components not only compromises our accountability to partners and funders but also hinders our capacity to demonstrate the holistic nature of our work.These cross-cutting services often span multiple domains, such as case management encompassing employment,	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1042	Mark Sewell	Washington County Community Action Council Inc.	Furthermore, the efficacy of CSBG's statutory purpose is compromised when there is a lack of mechanisms to report on the supportive services that directly contribute to significant short-term and long-term impacts. These services serve as causal links between the interventions provided and the outcomes achieved, underscoring the importance of capturing their impact within the reporting framework.	Request Change Accepted	OCS has updated all FNPIs to include an 'other' with requirement of description, which will allow agencies to capture outcomes not described elsewhere in the report. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency (subrecipient), state, tribe, or territory (grant recipient) from collecting the information for their specific needs.
1043	Mark Sewell	Washington County Community Action Council Inc.	The CSBG Annual Report functions as a versatile tool, offering a menu of potential options for documenting common services and outcomes. It is essential that this reporting mechanism allows for flexibility to accommodate the diverse range of services and strategies implemented by our agency to address specific local needs. Eliminating these critical services from the reporting process not only fails to alleviate the reporting burden but also risks diminishing the overall quality and depth of the report, thereby hindering the comprehensive assessment of our activities and their impact on the community that we serve.	Request Change Accepted	OCS has updated all FNPIs to include an 'other' with requirement of description, which will allow agencies to capture outcomes not described elsewhere in the report. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency (subrecipient), state, tribe, or territory (grant recipient) from collecting the information for their specific needs.
1044	Rebecca Himlin	Community Action Pioneer Valley, Inc.	Proposed service 4g should be 'Weatherization and Energy Efficiency Improvements' (this is broad enough to include appliances, insulation, solar, etc.)	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1045	Rebecca Himlin	Community Action Pioneer Valley, Inc.	We need to retain the 'Independent-Living Home Improvements' service, which is correctly in the HOUSING domain in the current framework—and this should be related to the Outcome of seniors and disabled people maintaining an independent living situation, which should be retained but moved to the HOUSING domain.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1046	Rebecca Himlin	Community Action Pioneer Valley, Inc.	Almost all of the proposed NPIs in the Health and Nutrition section are simply stating someone received a service. These are NOT outcomes. I don't think the proposed indicators improve the existing framework in any way.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1047	Rebecca Himlin	Community Action Pioneer Valley, Inc.	The proposed framework completely leaves out outcomes related to improved parenting skills/abilities, which relate to critically important work done by CAAs. The outcomes in the existing framework must be retained in order to communicate information about this work: '5d. the number of individuals who improved skills related to the adult role of parents/caregivers,' and '5g. The number of parents/caregivers who demonstrated increased sensitivity and responsiveness in their interactions with their children.'	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1048	Rebecca Himlin	Community Action Pioneer Valley, Inc.	The proposed language change, '5a Number of individuals who then improved their health and well-being through preventative measures' does not improve upon the existing language: 'individuals who demonstrated improved physical health and well-being.' The current language is much more understandable and general enough to relate to various interventions. The proposed language related to the NPI on improved mental health is similarly NOT an improvement and should not be changed.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1049	Rebecca Himlin	Community Action Pioneer Valley, Inc.	Our state framework includes an NPI for 'number of individuals who obtained health coverage.' We believe this is an important outcome and should be added to the national framework if changes are being made.	Alternative Response	OCS acknowledges this comment and notes. The number of individuals who obtained health coverage can be reported in FNPI 5b. OCS will release a manual and expand training on the revised report to clearly define which outcomes would be countable in this indicator.
1050	Rebecca Himlin	Community Action Pioneer Valley, Inc.	One category that has been eliminated is the Family Skills Development section. The proposed framework essentially removes all references to family support and parenting education services, and that is a major problem, given the substantial work many CAAs do in this area, ours included.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1051	Rebecca Himlin	Community Action Pioneer Valley, Inc.	Nutrition and Food/Meals category. One limitation of the current and proposed framework is that the WIC program is not adequately represented, and many CAAs run this program. 'Nutrition Counseling' is a critically important service related to this evidence-based program, and should be added as a service option here. I would also recommend a service related to 'Obtaining WIC Benefits,' and 'Obtaining SNAP benefits.' All of these relate to our proposed outcome of 'improving food security.'	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
1052	Rebecca Himlin	Community Action Pioneer Valley, Inc.	The service 'Health insurance options counseling' should also include the words '…and application assistance' to better capture the extent of these services.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1053	Rebecca Himlin	Community Action Pioneer Valley, Inc.	I suggest that developing leadership abilities to actually participate in civic engagement and advocacy and developing skills related to volunteering in the community are very different and I believe there should be separate NPIs for these distinct ways of helping to improve conditions in the community. The NPIs would start with the same language as proposed, but one NPI would add the phrase 'through civic engagement and advocacy' (which could include Board leadership, participation local advisory bodies, organizing projects focused on a particular issue, etc.) and the other would add the phrase 'through volunteering.'It	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1054	Rebecca Himlin	Community Action Pioneer Valley, Inc.	The service Leadership Development Training has been omitted in the proposed framework, which is a critically important aspect of our work and must be retained.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1055	Rebecca Himlin	Community Action Pioneer Valley, Inc.	I believe that self-sufficiency programs more logically fall in the Income/Asset Development domain.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
1056	Rebecca Himlin	Community Action Pioneer Valley, Inc.	I do not support eliminating the Services Supporting Multiple Domains category in favor of this much more narrowly focused Transportation domain. The thinking behind Services Supporting Multiple Domains is to capture a number of services that are cross-cutting, and this domain must be retained. ALL the services that would be eliminated in the proposed framework are important and most don't fit nicely elsewhere. Case Management IS a cross-cutting service used in a variety of contexts. ID document assistance, Immigration assistance, Legal Assistance—all of these are VERY important and don't exist elsewhere in the framework.It is fine to	Request Change Not Accepted	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1057	Rebecca Himlin	Community Action Pioneer Valley, Inc.	I support the proposed changes to the Age categories that align them with what the Census collects. This would make it much easier to compare our data with data from the Census, which we do attempt to do every time we do our Community Assessment. On the other hand, I think that there has been much thinking at the Census, the Department of Housing and Urban Development, and other federal departments about including more options for Gender than what is reflected in your revision. 'Self-identified male' or 'Self-identified female' could definitely include Transgender individuals, but that would not enable us to identify whether	Request Change Not Accepted	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements
1058	Rebecca Himlin	Community Action Pioneer Valley, Inc.	I do not support removing the detail we collect on sources of income, as that information is critically important in helping to identify needs and design interventions appropriate to the populations we serve.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1059	Rebecca Himlin	Community Action Pioneer Valley, Inc.	It is important to realize that there are many databases in use by CAAs, often designed for specific programs (federal or state) and that we are not given full access to. That means that we are unable to de-duplicate the information for reporting purposes, though we often can get the total number of households and individuals served in those programs. Removing the option to include these additional numbers will significantly diminish the impact of our work. For example, we cannot get individually identifying information from the state for our WIC program, which serves almost 3,000 people annually. This is a significant	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an 'other' with requirement of description.
1060	Kim Stevens	Daniel Boone Community Action Agency, Inc.	DBCAA proposes there should be more funds for CSBG eligible entities due to cause of work to be greater.	Alternative Response	OCS appreciates this feedback. The purpose of this exercise was to examine the burden in the information collection.
1061	Kim Stevens	Daniel Boone Community Action Agency, Inc.	It appears it would make for changes of ROMA.	Alternative Response	OCS appreciates this comment and emphasizes that these changes are based on the foundational annual report approved in 2017 and developed in conjunction the Network. A key element is the federal office has additional regulations to comport with including that of the Paperwork Reduction Act. The federal office extensively reviewed every data point on its own and collectively, reviewed the last five year's worth of data submitted, the technical assistance requests, and the way each of the data points are utilized at the national level for federal reporting requirements
1062	Kim Stevens	Daniel Boone Community Action Agency, Inc.	The changes of numbering the Modules would cause confusion with CSBG eligible entities. Maintaining the current Module system is and would be beneficial.	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1063	Kim Stevens	Daniel Boone Community Action Agency, Inc.	It would be burdensome for the State, State Association, and agencies if not able to see outcomes on reports. Due to further information would become required to get outcomes on clients for the agency.	Alternative Response	OCS appreciates the feedback. Parallel to these efforts, OCS launched the CSBG Performance Management Website and states have been urged to request access to begin providing feedback. If you have questions about your states account status, please contact the CSBG State Administrator.
1064	Kim Stevens	Daniel Boone Community Action Agency, Inc.	Changes to the service language would lessen the achievements of the outcomes. This would cause agencies to struggle to show progress made helping clients with economic security.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1065	Kim Stevens	Daniel Boone Community Action Agency, Inc.	There should not be changes to the All Characteristics Report as it is useful information, especially when applying for Grants for the need of specific characteristics needed.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1066	Kim Stevens	Daniel Boone Community Action Agency, Inc.	The new OCS dashboard coming will show lumping services and no outcomes. This would appear to undermine the work that CSBG eligible entities do.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1067	Kim Stevens	Daniel Boone Community Action Agency, Inc.	FNPI Number of unemployed adults who obtained employment has been removed and it is a part of the CSBG Act.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1068	Kim Stevens	Daniel Boone Community Action Agency, Inc.	There are no services to match the new NPI 3b or 3c. There should be services added due to agencies will encounter difficulties accurately showing progress they have made assisting clients goal of economic security.	Alternative Response	OCS acknowledges this comment and appreciates the feedback. As specified in the Service to Outcome Plan provided with the Dear Colleague Letter, FNPI 3b and 3c are associated with SRV 3a. The number of individuals that received training and counseling services for income management and asset building (e.g., credit repair, financial literacy, financial management, budgeting, homebuying, foreclosure avoidance).

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1069	Kim Stevens	Daniel Boone Community Action Agency, Inc.	SRV 4g Households receiving weatherization services doesn't align with the FNPI 4f the Number of individuals served with energy assistance and/or energy efficient homes. Served with energy assistance includes a service such as Liheap.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1070	Kim Stevens	Daniel Boone Community Action Agency, Inc.	Why are Case Management, referrals, and eligibility determinations being removed? This lessens the work of the agency.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1071	Kim Stevens	Daniel Boone Community Action Agency, Inc.	Employment is an important indicator and part of the CSBG Act.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1072	Kim Stevens	Daniel Boone Community Action Agency, Inc.	2a- Enrolling in a service is an output and not an outcome	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1073	Kim Stevens	Daniel Boone Community Action Agency, Inc.	2b-Actvely connected is a service and not outcome	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1074	Kim Stevens	Daniel Boone Community Action Agency, Inc.	2e-What is the change? Enrolling doesn't mean achieving; this is a service.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1075	Kim Stevens	Daniel Boone Community Action Agency, Inc.	3a- If a customer completes training, this does not mean they accomplished an outcome	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1076	Kim Stevens	Daniel Boone Community Action Agency, Inc.	3b- No services to match this NPI.	Alternative Response	OCS acknowledges this comment and appreciates the feedback. As specified in the Service to Outcome Plan provided with the Dear Colleague Letter, FNPI 3b and 3c are associated with SRV 3a. The number of individuals that received training and counseling services for income management and asset building (e.g.: credit repair, financial literacy, financial management, budgeting, homebuying, foreclosure avoidance).
1077	Kim Stevens	Daniel Boone Community Action Agency, Inc.	FNPI 4f- Why was 'served with energy assistance' added? Would LIHEAP be counted here?	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1078	Kim Stevens	Daniel Boone Community Action Agency, Inc.	FNPI 4g-Is this Lihwap? This would be an output and not an outcome.	Request Change Accepted	OCS has made revisions to indicators that provide a more structured directional language to measure outcomes across the domains. OCS will release a manual and expand training on the revised report to clearly define which outcomes would be countable in this indicator.
1079	Kim Stevens	Daniel Boone Community Action Agency, Inc.	Outcomes in Domain 5 are outputs (services), not outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1080	Kim Stevens	Daniel Boone Community Action Agency, Inc.	FNPI 5b, 5c, 5d, 5e, 5g, 5h, 5i These are an output and not an outcome. What would the change be?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1081	Kim Stevens	Daniel Boone Community Action Agency, Inc.	5f is being removed but is very important FNPI for agencies serving senior independent living.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1082	Tammy Walker	Economic Security Corporation (ESC)	I would like to see Module 3 remain Community Projects. Switching Module 3 and 4 will only cause unnecessary confusion and not reduce the reporting burden.	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
1083	Tammy Walker	Economic Security Corporation (ESC)	SRV 1 Employment. There are not enough options to really show the breadth of our work with	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1084	Tammy Walker	Economic Security Corporation (ESC)	SRV 4 Housing. SRV4e lumps transitional housing, permanent housing and rapid rehousing all together. These are all very different types of housing. Transitional is only 2 years and typically not permanent as the person has to find other housing after that 2 years. Rapid Rehousing is a two year subsidy while other permanent housing options might have a long term subsidy or none at all. I think we are not showing the scale and breadth of our work by lumping them together as they are very different types of housing.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1085	Tammy Walker	Economic Security Corporation (ESC)	Income. With the new changes we are not able to show connection to mainstream resources which helps increase a person's income.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1086	Erik Johnston	Virginia Community Action Partnersh	VACAP's top priority request is to maintain flexibility to report programmatic and fiscal reports on the state fiscal year. The proposal to shift to the Federal Fiscal Year will negatively impact our agencies and the partners we deliver resources to. In the CSBG Annual Report v. 3.0., OCS proposed that all modules would be reported on using the Federal Fiscal Year (October 1 to September 30). Currently, Virginia state government grant funds using the state fiscal year and our reporting is collected using the state fiscal year. Our state office we would need to modify contract dates and make significant changes to our state database systems to	Alternative Response	OCS acknowledges this comment and emphasizes that the shift to federal fiscal year should not change the way contracts are handled at the local level but rather the reporting of services. To effectively aggregate national data across 53 states and territories, OCS is priotizing using one standardized reporting period. OCS anticipates this will be of minimal burden as we have found through the reporting submitted that all states and agencies receiving other federal funds currently report on a federal fiscal year.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1087	Erik Johnston	Virginia Community Action Partnersh	We are concerned with a shift from outcomes to outputs. Our network has prioritized the impacts of outcomes over the last several years. The ability to show how an agency can impact a client through outcomes is a powerful storytelling tool. Many of the new FNPIs are focused on outputs rather than outcomes. Several of the NPIs are similar to the services, rather than a result of the services. We have concern regarding how the network will be able to continue to show the impact of the great work being done in their communities with the loss of outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1088	Erik Johnston	Virginia Community Action Partnersh	In Virginia we are prioritizing the whole family concept. The proposed changes to eliminate many services in category 7 (specifically: FNPI 7a, SRV 7a, SRV 7b, and SRV 7c) would negatively impact the ability of our agencies to show the specific impacts through the whole family work being done in Virginia.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1089	Erik Johnston	Virginia Community Action Partnersh	Continue to report on households receiving Volunteer Income Tax Assistance (VITA) or other no/low-cost tax preparation. SRV3a-3f; 3m-3o merges multiple income management and asset building information. In Virginia, data on VITA is a critical data point that we request be maintained.	Request Change Accepted	OCS accepts this edit and has added VITA as a countable service for SRV 3a and will include this in the supplemental manual and training upon OMB approval.
1090	Erik Johnston	Virginia Community Action Partnersh	The elimination and combination of a vast majority of the services and outcomes will create the need for the state and VACAP members to completely overhaul reporting systems. This will come with a significant cost burden as well as a significant time burden for state and agency staff. All training materials will need to be updated which includes many webinars and informational templates.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
1091	Erik Johnston	Virginia Community Action Partnersh	There are several key services and outcomes that we would like to see stay in the report, as they help tell the story of the great work being done in our communities. Those key services and outcomes we would like to see remain are: SRVs = 2i, 2j, 3m, 3o, 4p 5hh, 5kk, 5mm, 5nn, 7a, 7b, 7c, 7m. FNPIs =1e, 2a, 2b, 2e, 3b, 3d, 3e, 3g, 3h, 3i, 4d, 5d.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1092	Erik Johnston	Virginia Community Action Partnersh	One area of burden typically discussed is unduplicated count, this area was not addressed by the elimination of services and outcomes, allowing for service counts vs. people counts would eliminate some of the burden of unduplicated counts and give a better picture of the services provided at an agency	Alternative Response	OCS acknowledges this comment and appreciates the feedback. We will continue to provide training and technical assistance through the federal office and the TTA Providers we fund to address this issue. OCS notes that we are responding to findings from the Government Accountability Office (GAO) to utlize the total number served to capture totals for national performance reporting. OCS acknowledges this comment. OCS has revised the SRVs to be more flexible, which may in part address the concern. OCS may want to point out that unduplicated counts of individuals were

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1093	Erik Johnston	Virginia Community Action Partnersh	If the proposed changes go through without the requested further time for input from the national network, we will need additional training and technical assistance for both the CSBG State Office, VACAP and our member agencies. We hope this training will be provided at the beginning of the process so we can ensure a smooth transition to the new reporting requirements. State training dollars will decrease with these changes because of IT costs.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1094	Jacqueline Orr	New York State (NYS) Community Action Association, Inc.	The removal of hours of Agency Capacity Building and the number of staff who hold certifications. These data points have posed an additional burden to Community Action Agencies.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1095	Jacqueline Orr	New York State (NYS) Community Action Association, Inc.	The addition of “service as concrete support” is seen as beneficial, reflecting the critical work Community Action Agencies (CAA) do to stabilize individuals and families.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1096	Jacqueline Orr	New York State (NYS) Community Action Association, Inc.	The inclusion of the new Transportation Domain elevates the recognition of the critical transportation work done by CAAs around the country, although the full impact of this work will likely still be unreportable due to deduplication challenges and limitations on what is reportable in Community Level Transformation. (see note in section III)	Alternative Response	OCS appreciates the feedback. The transportation domain uses the actual transportation service as the unit of measurement. This has been revised to be more clear. For example, it's the number of gas cards, vouchers, rides, etc. vs. the number of people.
1097	Jacqueline Orr	New York State (NYS) Community Action Association, Inc.	In any performance management system, it is crucial to distinguish between indicators related to services and those related to results. The Annual Report, specifically Module 4 (version 2.0), is designed to collect information on service provision (SRV) and the achievement of results (National Performance Indicators, NPIs). FNPI 2a – The number of young children (0-5) enrolled in childcare or early childhood education services. Enrolling in a service is an output, not an outcome. FNPI 2b – The number of youth actively connected to education and skills development program. Being connected is a service, not the outcome. FNPI 2e –	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1098	Jacqueline Orr	New York State (NYS) Community Action Association, Inc.	The following Individual/Family Level National Performance Indicators (NPIs) proposed to be added refer to services and not to outcomes. FNPI 5b – The number of individuals with access to health coverage. Having access to coverage does not mean an improved status. FNPI 5c – The number of individuals receiving reproductive services. Receipt of a service is not an outcome. FNPI 5d – The number of individuals receiving wellness services. Receipt of a service is not an outcome. FNPI 5e – The number of older adults (age 65+) receiving home visiting services. Receipt of a service is not an outcome. FNPI 5g – The number of adults	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1099	Jacqueline Orr	New York State (NYS) Community Action Association, Inc.	In the proposed changes, National Performance Indicators (NPI) have been removed with the objective of reducing burden or increasing clarity. However, some items that are proposed to be removed will reduce the ability of the network to meet proper performance measurement. The FNPI and SRVs identified below are indicators and services that reflect important activities in which many agencies are engaged and should be retained. FNPI 1b - The number of unemployed adults who obtained employment. FNPI 5d - The number of individuals who improved skills related to the adult role of parents/ caregivers. FNPI 5f - The number of	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1100	Jacqueline Orr	New York State (NYS) Community Action Association, Inc.	This option of using “z” indicators is being proposed for elimination in 3.0. We recommend retaining the “z” indicators to allow for flexibility to reflect the unique outcomes not otherwise captured by the federal report. Loss of this option will limit the ability of the network to identify innovative changes that may be the seeds of new approaches and new advancements to be identified.	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an ‘other’ with requirement of description.
1101	Jacqueline Orr	New York State (NYS) Community Action Association, Inc.	Household Level Characteristics- NYSCAA recommends retaining the household income source data point in demographics reporting to ensure the accurate representation of the economic impact of services provided by CAAs and to maintain critical insights into the economic conditions of the populations they serve.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1102	Jacqueline Orr	New York State (NYS) Community Action Association, Inc.	NYSCAA proposes retaining the following data indicator: Single Parent Female and Single Parent Male. This is useful for agencies when applying for certain grants (e.g., Fatherhood Initiatives, etc.).	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1103	Jacqueline Orr	New York State (NYS) Community Action Association, Inc.	While the addition of a Transportation domain to the list of possible domains for which information will be collected is welcomed, the elevation of this service may pose a significant burden. The SRV section asks agencies to collect and provide information on unduplicated individuals served. Agencies that provide services without the collection of demographic data will be challenged. If “riders” use the service multiple times, the task of deduplication can be burdensome and, in some cases, impossible. Some of this may resolved if there were related NPIs for the services to be connected.	Alternative Response	OCS acknowledges this comment and notes all service counts are no longer based solely on the number of individuals served but are flexible for different units of measurement. The column for Transportation (SRV 7) now reads Unduplicated Number Served so the unit of measuremenr would be the voucher, pass, card, ride, or form of assistance. OCS will release supplemental materials and guides to provide more training and explanatory language on this service domain.
1104	Beck Moore	Community Action Association of PA	Additionally, it is not clear why the Transportation domain does not have Indicators. While in some cases, providing transportation services is what is being identified as “concrete support,” in many cases, the move from not having transportation to having transportation produces an impact on a family’s ability to meet their basic needs. When a family “obtains adequate transportation,” that is a change in status, similar to when a family “obtains housing” and should have NPIs associated with the services. Not having any indicators associated with an entire domain sends a message that outcomes are not important.	Alternative Response	OCS acknowledges this comment and recognizes the burden to track this long term can prove to be too burdensome, but we rely on evidence that demonstrates access to transportation is a key indicator of economic mobility.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1105	Beck Moore	Community Action Association of PA	We are very supportive of the change in Section G to reference all Performance Management systems that meet the requirements of Section 678E(b) of the CSBG Act rather than limiting this to only the ROMA system. Pennsylvania's state office has responded to local Agency feedback in recognizing that different situations require different approaches to performance management and continuous improvement, and the state association has developed modernized performance management training to meet the changing needs of our Agencies. This change makes it clearer that accepting the use of other performance management	Alternative Response	OCS acknowledges this comment and appreciates this feedback. G4 was appropriately referenced.
1106	Beck Moore	Community Action Association of PA	Federal fiscal year switch – We understand the decision to switch to a federal fiscal year for all reporting. However, we want to note that this switch will increase the burden for Pennsylvania's Agencies in the first couple years of implementation. PA currently contracts and reports on a calendar year; therefore, all data collection systems will need to change to the new reporting period. Additionally, a calendar year is a reporting timeline that makes sense for reporting outcomes to the community and that is a critical part of our reporting work. Having community engagement is critical to community action and reporting our outcomes is part of	Request Change Not Accepted	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
1107	Beck Moore	Community Action Association of PA	Domain name changes – The change of the Education and Cognitive Development domain to Education and Youth Development feels misleading since the adult education NPIs are in this section.	Alternative Response	OCS acknowledges this comment. The domain was initially expanded to consider the range of those included in the services, but the heading has been simplified to simply education.
1108	Beck Moore	Community Action Association of PA	Additionally, we do not agree with the removal of the Services Supporting Multiple Domains section. To reduce barriers to economic sufficiency, services such as intensive case management are essential. Having a domain to capture this is important.	Alternative Response	OCS acknowledges and appreciates this feedback. There are services in the current Services Supporting Multiple Domains (such as Child Care Subsidies/Payments, Day Centers, clothing assistance) that have been restructured into other domains. OCS reviewed the last five years worth of data submissions and technical requests and several of the services presented here were either underutilized or created a burden with capturing the correct unduplicated count. Therefore, OCS has removed them from the federal reporting requirement to minimize the collective
1109	Beck Moore	Community Action Association of PA	The reordering of modules will create an increased burden for Agencies and state offices as all data collection systems will need to be updated to this new numbering scheme. If Agencies need to do this work themselves, it will result in a time burden. If client tracking software vendors choose to do the work, it will result in a cost burden. Either way there will be a time and cost associated with training staff. While we recognize that the removing and adding of services and NPIs will adjust numbering no matter which module they are in, switching from module 4 to module 3 will increase the changes significantly	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
1110	Beck Moore	Community Action Association of PA	Former SRV 3o – VITA services are a proven method for moving families out of poverty. Removing this service will eliminate a data point that demonstrates one service that CAAs use that is more than a "band-aid" service. We recommend restoring it.	Request Change Accepted	OCS accepts this edit and has added VITA as a countable service for SRV 3a and will include this in the supplemental manual and training upon OMB approval.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1111	Beck Moore	Community Action Association of PA	New SRV 4d – Utility services are provided for purposes other than eviction prevention. We recommend restoring the sub-category of Utility Payment Assistance and moving this service back under this section.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
1112	Beck Moore	Community Action Association of PA	New SRV 4f and 4g – As Weatherization now has funding streams that pay for health and safety and readiness activities, it is important to provide instructions as to if those services will be reported with the other maintenance services in 4f or with the Weatherization services in 4g.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1113	Beck Moore	Community Action Association of PA	Module 3a – Services Supporting Multiple Domains/ Transportation Former 7a-c – In helping families to reach longer term goals rather than stopping when initial needs are met, intensive case management (resource navigation, coaching, etc) is essential. Former SRV 7a provided Agencies a place to show how often this was occurring; while former SRV 7b and 7c demonstrated the linkages that came from some of those case management appointments.	Alternative Response	OCS acknowledges and appreciates this feedback. There are services in the current Services Supporting Multiple Domains (such as Child Care Subsidies/Payments, Day Centers, clothing assistance) that have been restructured into other domains. OCS reviewed the last five years worth of data submissions and technical requests and several of the services presented here were either underutilized or created a burden with capturing the correct unduplicated count. Therefore, OCS has removed them from the federal reporting requirement to minimize the collective
1114	Beck Moore	Community Action Association of PA	Current Module regarding Transportation – If former SRV 7d is split into the proposed SRV 7a-e, key services missed, which also serve to provide longer term supports to transportation challenges are: auto repair, purchase, ownership, etc. The proposed services only focus on temporary assistance services as opposed to services that would provide a net asset to families.	Request Change Not Accepted	OCS reviewed all of the technical assistance requests and the utilization of indicators writ large in reporting and there were significant issues with validity of the data reported for services supporting multiple domains in addition to the burden placed on local and state agencies to correctly capture this data point, OCS prioritized the burden reduction and removed this indicator from federal reporting requirements. OCS emphasizes that the removal of the federal requirement to report does not preclude states and local agencies from collecting the data and using for their own needs.
1115	Beck Moore	Community Action Association of PA	Within the provided NPIs in Module 3b, we have overall concerns regarding the removal of the NPIs that show time measurements, which measure longer-term stability and outcomes, as opposed to solely focusing on immediate service counts ("band-aids"). Such changes risk obscuring the true impact of the CSBG program and may hinder efforts to assess its effectiveness in addressing poverty and promoting self-sufficiency. While it was noted on the calls with OCS that there was a concern regarding the burden of follow-up when requesting reporting on these measures, many Agencies already collect this data for other funding such as	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1116	Beck Moore	Community Action Association of PA	While measuring skills gained leading to employment is important (NPIs 1a-1b), it only takes participants half-way to the end goal. We would encourage the Department to add an NPI back in that would measure employment obtained as this is the result that will lead to actual economic gains.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1117	Beck Moore	Community Action Association of PA	New NPIs 2a, 2b and 2e- Simply measuring “enrollment” or “connection” does not actually measure an outcome of a skill gain or change. We encourage changing the wording of these NPIs back to outcomes wording rather than output wording.	Alternative Response	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1118	Beck Moore	Community Action Association of PA	New NPI 2b- While it is implied that this NPI is for youth aged 5 and older, the age range is not clear.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1119	Beck Moore	Community Action Association of PA	Former NPI 2e- Combined with former NPIs 5d and 5e, 2e was one of the measures where the results of multi-generational programming could be reported. If these three NPIs are eliminated, it is important to provide an NPI to replace them where whole family outcomes can be captured.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1120	Beck Moore	Community Action Association of PA	Former NPI 2f- Many individuals enrolling in adult education classes will have many years before they are ready to begin taking GED-preparation level classes. Former NPI 2f captured the progress of these individuals and could have been standardized if it had been tied to rising in assessment level with which ever assessment (such as TABE) a program was using.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1121	Beck Moore	Community Action Association of PA	New NPI 3a- This NPI is worded as an output rather than an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1122	Beck Moore	Community Action Association of PA	Goal 1 of CSBG Theory of Change is “Individuals and families with low incomes are stable and achieve economic stability.” The Income and Asset Building section should contain at least one NPI that measures achievement of this goal.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1123	Beck Moore	Community Action Association of PA	New NPI 4f – This NPI is unclear. It is worded as an output. Splitting it into two separate NPIs – one focused on increasing energy efficiency of homes and the other focused on avoiding or restoring utility access – would allow this to be worded as an outcome again.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1124	Beck Moore	Community Action Association of PA	New NPIs 5c, 5d, 5e, 5g, 5h, and 5i – The NPIs all are measuring receipt of service and not an outcome of that service. We encourage rewording these back to outcomes wording, as otherwise, they only should be in new Module 3b – Services.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language.
1125	Beck Moore	Community Action Association of PA	Former NPI 5f – Rather than change this NPI to 5e which only measures home visiting services, we encourage leaving the original wording so that other means of maintaining independent living can be captured (home delivered meals, home modifications, etc.). We also recommend changing the age range captured in this NPI to ages 60+ to align with the Older Americans Act. This will reduce burden for those Agencies who dually serve as their community's Area Agency on Aging as the same age range will be used for multiple funders.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1126	Beck Moore	Community Action Association of PA	Communities should be at the heart of all Community Action Agencies. It is literally in our names. By once again leaving this Community Level initiatives module optional and largely untouched, it is sending the message that this larger transformative work is less valued or less important. The real impact of CAA comes from community involvement: sitting and being heard at the decision tables, being recognized as community/county/state leaders, being recognized as problem solvers, being capable of leveraging resources and finding solutions, demonstrating high integrity and transparency, being individual/ family/ business/	Alternative Response	OCS acknowledges this comment and notes that Community Level Transformation is recommended but not required due to the content of submissions in previous years, indicating the need for increased technical assistance and also keep in mind there are a vast array of state and local agencies that may not have the capacity to carry out a transformation initiative based on their funding levels. OCS believes that with enhanced training and technical assistance once we have addressed data validity in the current reporting structure, we can work collectively to build capacity
1127	Beck Moore	Community Action Association of PA	One of the biggest challenges from Annual Report version 2.0 is a lack of guidance documentation for the collection and reporting of data. This has resulted in an inconsistency in how data is reported from Agency to Agency and state to state. Pennsylvania's CAAs have emphasized the importance of standardized guidance and improved documentation of community-level initiatives. It is imperative to develop a better framework for reporting outcomes and demonstrating the impact of CSBGfunded initiatives on the ground. This includes establishing clearer guidelines for data collection and analysis, as well as enhancing efforts to	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1128	Beck Moore	Community Action Association of PA	Education – SRV 2l-2n do not necessarily result in certificates or credentials. Rather they result in a skills gain (formerly captured under former NPI 2f)	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1129	Beck Moore	Community Action Association of PA	In light of these concerns, we urge policymakers and relevant stakeholders to reconsider the proposed changes to the CSBG Annual Plan 3.0. It is essential to ensure that any modifications to the program are guided by a commitment to transparency, accountability, and the overarching goal of alleviating poverty and promoting economic self-sufficiency. It is our hope that the Department will reconsider the removal of NPIs and services that focus on the comprehensive, economic-stability-achieving work that CAAs are doing. This is the work that separates us from other social service providers. If the goal is to reduce the	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an
1130	Tomekia Moore	Arkansas Community Action Agencies Association	While we appreciate OCS for considering the challenges of intensive reporting, we find the thoroughness thereof to be extremely necessary. Over the years, Community Action has successfully demonstrated who we are – down to mission, purpose, and vision – by allowing the data to speak for us. Communicating our story through accurate pieces of data while capturing the needs of communities has proven to be an effective means of securing and maintaining support at the federal, state, and local levels. Reducing reporting measures may result in reprehensible damage to The Network and the very communities that we strive to	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1131	Tomekia Moore	Arkansas Community Action Agencies Association	ACAAA is especially concerned with the removal of Services Supporting Multiple Domains. This omission would eliminate The Network's ability to report on comprehensive services characterized by Case Management and Whole Family Services. These items are deeply rooted in The Network's capacity to place individuals and families on a path to self-sufficiency. Eliminating these services fails to illustrate Community Action's scope of provision and disregards its holistic nature.	Alternative Response	OCS acknowledges and appreciates this feedback. There are services in the current Services Supporting Multiple Domains (such as Child Care Subsidies/Payments, Day Centers, clothing assistance) that have been restructured into other domains. OCS reviewed the last five years worth of data submissions and technical requests and several of the services presented here were either underutilized or created a burden with capturing the correct unduplicated count. Therefore, OCS has removed them from the federal reporting requirement to minimize the collective
1132	Keri McCrory	East Missouri Action Agency (EMAA)	The proposed changes to the CSBG Annual Report will have significant implications, positive and negative, on how East Missouri Action Agency reports on our activities, outcomes and impacts to local, state and federal entities as well as to our partners locally. From a data and statistical standpoint, the consolidation of some data points are a welcome "update". However, in some areas we believe some of the changes will cause us to be unable to truly show the impact of the work our Community Action Agency does on a national level, especially the work that is unique to our communities.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1133	Keri McCrory	East Missouri Action Agency (EMAA)	In regards to serving our communities and their individual and identified needs; several of the proposed changes, both in Performance Indicators and in Services, will hinder our ability to report some of our rather unique efforts in our very diverse service area with supporting people in reaching their highest potential. As you know CSGB funding allows us to be pliable and instantly adaptable to our community's needs. Without the flexibility of the CSBG, we would not have been able to make a measurable impact on some of our diverse community needs by braiding funding and resources to address those needs. Removing 7 / z-other	Alternative Response	OCS accepts this edit and has updated all FNPIs to include an 'other' with requirement of description.
1134	Keri McCrory	East Missouri Action Agency (EMAA)	With the above being said, East Missouri Action Agency agrees with the NCAP on the clearance for Version 2.1 and then an intensive collaborative process for Version 3.0 with the Community Action network. Version 3.0, from a data standpoint, is putting a square peg in a square hole. As an agency that has embraced data-driven modeling earlier than most, Version 3.0 does reduce the burden in some areas, but in others, it completely and effectively stifles the innovation and creativity that all Community Action Agencies have to make an impact on their very diverse communities. Removing the z. - other FNPIs and	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1135	Keri McCrory	East Missouri Action Agency (EMAA)	Additionally, EMAA believes that the proposed changes will pose a significant burden that will impact our data systems, as additionaltraining will be required for our staff that will cause unnecessarycost and time for our agency.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
1136	Keri McCrory	East Missouri Action Agency (EMAA)	East Missouri Action Agency will not outline every line of the 3.0 Version that needs discussion as the National Community Action Partnership and other Community Action Agencies have already given the OCS a very clear outline of detailed changes that need to be made. We would be happy to assist in the national discussion as we have a dedicated Data and Systems Analyst and are a leader ln innovative and unique ways to braid services and funding to serve our communities. lf no changes are made, it will have a devastating and lasting effect on how CCA's support our communities. "What doesn't get reported, doesn't get	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1137	Sharon Scott-Chandler	Action for Boston Community Development, Inc.	The revisions outlined in Module 3, Section A: Individual and Family Services will negatively impact the quality and clarity of the data in the report. The proposed reporting standards call for mixed units of measurement. Some indicators call for the number of individuals served, some call for the number of goods provided (e.g. diapers) and some call for the specific number of individuals served in identified demographic categories. This revision would require an overhaul in the way that ABCD and most Community Action Agencies track and report data because, for example, most Community Action Agencies are not tracking the	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1138	Sharon Scott-Chandler	Action for Boston Community Development, Inc.	The revisions outlined in Module 3, Section B: Individual and Family NPIs will negatively impact the quality and impact of the data in the report. The removal of the “z” FNPIs will result in underreporting of outcomes achieved by ABCD’s community members and the entire Massachusetts Community Action Agency network. In Massachusetts, a statewide CSBG data working group was created in response to transition to ROMA Next Generation, tasked with developing a common listing of “z” FNPI indicators for all Massachusetts Community Action Agencies to utilize. The goal being two-fold, to enable Massachusetts Community	Alternative Response	OCS accepts this edit and has updated all FNPIs to include an ‘other’ with requirement of description.
1139	Sharon Scott-Chandler	Action for Boston Community Development, Inc.	ABCD is committed to working with OCS and the Community Action Agency network to ensure that the full impact of services provided by Community Action Agencies is accurately reported. This data collection is critical to demonstrating that Community Action Agencies are persistently fulfilling the CSBG Act’s mission to alleviate the causes and conditions of poverty in under-resourced communities. ABCD is concerned that the revision to Module 2, Section A.2 which eliminates the services supporting multiple domains will result in underreporting of services provided by Community Action Agencies. This domain allows ABCD to report on	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
1140	Sharon Scott-Chandler	Action for Boston Community Development, Inc.	Additionally, ABCD is concerned that the elimination of the services supporting multiple domains will impact the accuracy of Module 2, Section A: CSBG Expenditures by CSBG Eligible Entity and will potentially limit ABCD’s ability to allocate CSBG funds to information and referral services. This may result in masking the true and comprehensive use of the funds by ABCD and the entire Community Action Agency network. The ability to tie a service provision to an Expenditure Domain in the Annual Report is critical–ABCD reported 6,786 services supporting multiple domains in 7C referrals in FFY23. ABCD reiterates that it is of	Request Change Not Accepted	OCS reviewed all of the technical assistance requests and the utilization of indicators writ large in reporting and there were significant issues with validity of the data reported for services supporting multiple domains in addition to the burden placed on local and state agencies to correctly capture this data point, OCS prioritized the burden reduction and removed this indicator from federal reporting requirements. OCS emphasizes that the removal of the federal requirement to report does not preclude states and local agencies from collecting the data and using for their own needs.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1141	Sharon Scott-Chandler	Action for Boston Community Development, Inc.	The revisions outlined in Module 3, Section C: The All Characteristics Report, sub-section D: Household Level Characteristics will not reduce the data collection burden for ABCD. In order to determine income eligibility for CSBG funded programs as well other programs administered by ABCD such as Head Start and LIHEAP, ABCD would still need to collect sources of household income. Additionally, Module 3, Section C sub-section 12, Level of Household Income is still a required reportable field. It is necessary to collect sources of household income in order to calculate levels of household income.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1142	Sharon Scott-Chandler	Action for Boston Community Development, Inc.	The removal of CSBG Annual Report 2.0 Module 4, Section C: The All Characteristics Report Sub-Section E: the Number of Individuals or Who May or May Not be Included in the Totals Above & CSBG Annual Report 2.0 Module 4, Section C: The All Characteristics Report Sub-Section F: the Number of Households Who May or May Not be Included in the Totals Above will result in an underreporting of clients served. ABCD reported nearly 22,000 individuals in the FFY23 CSBG Annual Report under Module 4, Section C, sub-section E. ABCD is unable to de-duplicate clients served in some programs provided by ABCD's	Request Change Not Accepted	OCS acknowledges this comment. For FNPIs, Annual Report 2.1 asked for unduplicated counts of individuals reporting outcomes, so there should be no change to the burden associated with collecting this information. For SRVs, notes all service counts are no longer based solely on the number of unduplicated individuals served but are flexible for different units of measurement.
1143	Sharon Scott-Chandler	Action for Boston Community Development, Inc.	The proposed staggered implementation in 2025 and 2026 is concerning because, if a state (or states) elect to require the implementation of the Annual Report 3.0 in 2025, it will result in inconsistent data collection across the nation. Thus, if Annual Report 3.0 is implemented, we recommend implementation, at the earliest, in 2026.	Request Change Not Accepted	OCS acknowledges that report changes might necessitate changes to information technology systems. To support grant recipients and subrecipients with this change, OCS will provide robust training and technical assistance opportunities. OCS will also provide an on-ramp for reporting with the optional use of Annual Report 3.0 in FY26 before the new report becomes mandatory in FY27. Grant recipients who do not use Annual Report 3.0 in FY26 will report using Annual Report 2.1.
1144	Sharon Scott-Chandler	Action for Boston Community Development, Inc.	The proposed revisions to the CSBG Annual Report 3.0 do not establish a single national reporting standard. As OCS acknowledged in its listening sessions, states may ask agencies to report on data beyond what is requested by OCS. Thus, it is unlikely that this version of the annual report will result in any decreased reporting burden for Community Action Agencies.	Alternative Response	OCS acknowledges this comment which emphasizes a key challenge with identifying a singular reporting structure that factors in the vast diversity of service offerings at the local level while contending with the burden placed on individuals, families, local, and state staff. There are indicators that were proposed to be removed as they are underutilized and underreported writ large. Reducing the burden placed on the many for the few was a key component of this exercie while balancing the necessary elements to tell the national performance story of CSBG.
1145	Sharon Scott-Chandler	Action for Boston Community Development, Inc.	The proposed revisions do not fully and accurately measure all of the outcomes of the services provided. In order to have a more comprehensive picture, OCS may consider having a long and short version of the annual reporting requirements, and have the short version due on a regular basis, which reports solely on number of unduplicated clients and demographics and provides as attachments any programmatic HHS reports that are applicable (e.g. Head Start, LIHEAP) and a long version due every 3 to 5 years that is more comprehensive and aligns more closely with proposed Annual Report 3.0.	Alternative Response	OCS acknowledges this comment and appreciates the feedback.
1146	Clint Cottam	Community Action Partnership of Utah	The current Annual Process undermines the precedent set in IM #152, leading some local agencies and the state association to deeply distrust OCS's timeline, process, motives, and rationale for changes. The Annual Report 3.0 was developed in a rushed, siloed, and top-down manner, leaving insufficient time for the network to provide substantial feedback before the entire network, including OCS, found themselves in a difficult position. The opening of the 60-day comment period in April took agencies, the state association, and the state office by surprise. Even more surprising was the 7-day turnaround between the 60 and 30-	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1147	Clint Cottam	Community Action Partnership of Utah	The removal of FNPI 7a - In the statewide network, it is hard to talk about the impacts on all Utahns when CAAs operate different programs, serve different populations, and experience different needs. As a statewide entity, CAP Utah uses data from FNPI 7a as a common and unifying message – Community Action changes people's lives. The current FNPI 7a outcome indicators supports an "Omnibus" performance at a statewide level (refer to #IM 49). CAP Utah is concerned that the removal of FNPI 7a could hinder its ability to send a clear, and unifying message when engaging with elected officials, funders, and the general	Request Change Not Accepted	OCS reviewed all of the technical assistance requests and the utilization of indicators writ large in reporting and there were significant issues with validity of the data reported for services supporting multiple domains in addition to the burden placed on local and state agencies to correctly capture this data point, OCS prioritized the burden reduction and removed this indicator from federal reporting requirements. OCS emphasizes that the removal of the federal requirement to report does not preclude states and local agencies from collecting the data and using for their own needs.
1148	Clint Cottam	Community Action Partnership of Utah	Changing outcomes to outputs in the Module 3 One major component of Results Oriented Management and Accountability (ROMA) or comparable "outcome" system, is that agencies do not report or assume that a receipt of a service is a family or community change. CSBG Annual Report version 3.0 is full of instances where the receipt of a service achieves a predefined outcome and/or includes outputs as outcome indicators. In Module 3, CAP Utah identified several outcomes indicators that were rewritten as outputs (receipts of services) rather than proof of a change. This runs contrary to the CSBG Act and definitely not in line with IM #49	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of indicators with directional language.
1149	Clint Cottam	Community Action Partnership of Utah	Changing outcomes to outputs in the Module 3 One major component of Results Oriented Management and Accountability (ROMA) or comparable "outcome" system, is that agencies do not report or assume that a receipt of a service is a family or community change. CSBG Annual Report version 3.0 is full of instances where the receipt of a service achieves a predefined outcome and/or includes outputs as outcome indicators. In Module 3, CAP Utah identified several outcomes indicators that were rewritten as outputs (receipts of services) rather than proof of a change. This runs contrary to the CSBG Act and definitely not in line with IM #49	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an 'other' with requirement of description.
1150	Clint Cottam	Community Action Partnership of Utah	The easiest solution to most of these issues is for OCS to adopt the Annual Report 2.1 version, which keeps the ability of CAAs to report on outcomes that may be unique to their efforts, which keeps FNPI 7a, and keeps efforts such as VITA and parent supports. This is not a perfect solution to reporting on digital access/inclusion work, but it does less damage to the ability of Community Action to tell its story than version 3.0. If CSBG Annual Report 3.0 is adapted, OCS should: Change indicator language to be outcomes rather than outputs (receipts of service) Include a datapoint in the "all characteristics" section that asks for the	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an
1151	Clint Cottam	Community Action Partnership of Utah	CAP Utah is of the opinion that the current process of developing CSBG Annual Report version 3.0 was rushed, not in line with the intent of the CSBG Act and past OCS guidance, does not allow the Utah network to adequately tell its story, and did not have the engagement needed to achieve its intended goals. CAP Utah strongly recommends that OCS adapt CSBG Annual Report 2.1 and work toward creating the next generation of the report that is better for the entire network.	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an
1152	Josiah Masingale	Colorado Community Action Association	Item 1: Whether the proposed collection of information is necessary for the proper performance measurement of federal, state, or local agencies. Performance management systems typically involve indicators for both service delivery (outputs) and achieved results (outcomes). However, it's crucial to clearly distinguish between these aspects. Currently, the Annual Report's Module 4 (version 2.0) uses separate sections to gather information on service provision (SRV) and results achieved (National Performance Indicators, NPIs). Clear guidance exists, outlining the distinction between these sections. NPI reporting should focus	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1153	Josiah Masingale	Colorado Community Action Association	Additionally, the change to the ordering of the modules (4 becomes 3 and 3 becomes 4) is unnecessary and confusing	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
1154	Josiah Masingale	Colorado Community Action Association	Item 2: The quality of the information to be collected. While some National Performance Indicators (NPIs) in module 4, section A of the CSBG Annual Report may be infrequently used or require clarification, they effectively capture the breadth and diversity of Community Action's achievements. Therefore, their removal is not recommended. Instead, I propose adding the following outcome indicators to Module 4, Section A: Family National Performance Indicator (NPIs) that should be added to Module 4, Section A: FNPI 2z.1 The number of youth living in improved home environments. FNPI 4.i The number of individuals that avoided	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1155	Josiah Masingale	Colorado Community Action Association	Additionally, I do not find the removal of the demographic characteristics, especially household characteristics of income sources and their breakdown in items 13-15 of Module 4, Section C, to reduce burden but does in fact reduce the network's ability to tell the story of our customers through the annual report. In fact, instead of removing items, I propose adding the following outcome household demographic characteristics to Module 4, Section C: State House District State Senate District Congressional District	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1156	Josiah Masingale	Colorado Community Action Association	Item 3: The clarity of the information to be collected. While the CSBG report offers various sections, it's not a one-size-fits-all approach. Local agencies should focus on reporting services and indicators relevant to their programs and Theory of Change. Clear communication is essential to ensure CSBG recipients understand the significance of comprehensive data collection, especially at the community level. This data is vital for effectively measuring progress towards poverty reduction and revitalizing low-income communities. Incomplete information hinders our ability to gauge the program's true impact across all of the commonly	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
1157	Josiah Masingale	Colorado Community Action Association	Item 4: Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of collection. No, in fact going through the process of a 60-day public comment period without first engaging the network on what the proposed changes in the Annual Report should be, has created much unnecessary burden. Additionally, making these changes will increase burden to the network in the near future through needing to adapt to the changes which will take years, and will create intense burden for agencies with	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
1158	Josiah Masingale	Colorado Community Action Association	Item 5: The accuracy of the agency's estimate of the burden of the proposed collection of information. This information seems overestimated in my experience.	Alternative Response	OCS utilized the burden estimate formula developed for the current annual report and adjusted it based on the reductions and kept in mind there would be initial increases in burden to account for the changes during the periods where there is an overlap of 2.1 and 3.0 reports in FY26 (3.0 is optional in FY26 before becoming mandatory in FY27) but that it would adjust over time. It should be noted that burden estimates are largely estimates and the federal office through an incremental implementation intends to provide expansive technical assistance and

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1159	Josiah Masingale	Colorado Community Action Association	Item 6: What, if any, additions, revisions, or modifications to the information collection would you suggest? 3I would suggest moving forward with the Annual Report Revisions 2.1 for now as that is an easy change, and I would table any Annual Report 3.0 revisions until the network can be engaged on what changes should be made in the report. I will also note that I believe somehow connecting services to the outcome(s) they help realize is a worthwhile endeavor, but would also caution OCS that often times there is not a one-to-one connection between a service and any one outcome, and that sometimes services are provided that do	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an
1160	Josiah Masingale	Colorado Community Action Association	Knowing you'll receive many comments, I've focused on these critical areas for your review. Regardless of the chosen path, training, technical assistance and other support are essential for the network's success. Accurate and timely accountability is crucial, which makes a representative CSBG network Annual Report so vital. I would be willing and able to discuss clarity improvements if you consider delaying Annual Report 3.0 clearance.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1161	Thames Valley Council for Community Action. Inc.	Thames Valley Council for Community Action, Inc.	The greatest burden is the collection of UNDUPLICATED Individuals and Households across our agency. Our programs use about 15 different systems to record client data (most per funder requirements) within case management, employement & training, housing, child development, family home visiting, volunteer, WIC, & senior nutrition services. The best way to reduce that would be to combine some of these systems on a state level, or support the cross-walk between them with similar data definitions.	Alternative Response	OCS acknowledges this comment. OCS has revised the SRVs to be more flexible, which may in part address the concern. OCS may want to point out that unduplicated counts of individuals were rquired in Annual Report 2.1, so this does not represent a change.
1162	Thames Valley Council for Community Action. Inc.	Thames Valley Council for Community Action, Inc.	The burden for adjusting to these changes would include time for a manager to understand the changes, a data manager to adjust the tool for collecting information across programs, training of program directors on the new FNPIs and meetings with multiple staff on where to get the information that fits in these indicators, an adjusting references in future Community Action Plans.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
1163	Thames Valley Council for Community Action. Inc.	Thames Valley Council for Community Action, Inc.	While we understand the logic to the re-ordering, it would have some burden in noting (& training staff) the change when referring to previous years for reference and guides. And having some signifier like "NEW Module 4 - Community..."	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
1164	Thames Valley Council for Community Action. Inc.	Thames Valley Council for Community Action, Inc.	Having the Service to Outcome Plan is key to understanding the SRVs & Indicators within the context of our programs. This should be published and accessible separately for entities.	Alternative Response	OCS acknowledges this comment and the Service to Outcome Plan is available for public reference as included in the DCL.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1165	Thames Valley Council for Community Action. Inc.	Thames Valley Council for Community Action, Inc.	Please define "youth" or provide an example with an age guideline.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator.
1166	Thames Valley Council for Community Action. Inc.	Thames Valley Council for Community Action, Inc.	Please define "youth" or provide an example with an age guideline.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1167	Thames Valley Council for Community Action. Inc.	Thames Valley Council for Community Action, Inc.	Why "access" to healthcare rather than "have" healthcare?	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1168	Thames Valley Council for Community Action. Inc.	Thames Valley Council for Community Action, Inc.	Having the SRVs as examples is key; otherwise the FNPI is unclear if it's limited to our clients.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1169	Julia Ackerman	Community Renewal Team, Inc.	The documentation provided by OCS was comprehensive, but without an accompanying Lexicon to further detail instructions and allowable activities made it difficult to understand what would be allowable under the new and/or revised reporting requirements. Recommendation: In order to fully ·respond and offer appropriate feedback a detailed Lexicon for all Module components is needed.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1170	Julia Ackerman	Community Renewal Team, Inc.	To accurately collect and report CSBG required data elements, 9+ years ago, CRT invested its resources to develop and create a Case Management database system. The database system was designed to collect the required data elements, complete the CSBG Outcome Service Matrix (OSM) assessment; capture client goals, progress, and achievement of the FNPIs and SRVs; and produce the reports needed to meet State and Federal CSBG reporting requirements. In addition, two other CT community action agencies are utilizing our client case management software. The overall changes proposed by the Office of Community Services is	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1171	Julia Ackerman	Community Renewal Team, Inc.	Eliminating services is not likely to reduce burden. Eliminating services also has the potential to compromise the quality and comprehensiveness of the report. There should be a balance between reporting burden and ensuring the report captures the full scope and results of the agency.	Alternative Response	OCS acknowledges this comment and appreciates the feedback. The report revisions were to ensure we addressed the expansive nature of performance measures across CSBG while meeting the requirements of the CSBG Act, the findings of the CSBG Government Accountability Office (GAO) report, and minimize the burden on the public under the Paperwork Reduction Act. The connection between service to outcome also enhances how we tell the national story of CSBG.
1172	Julia Ackerman	Community Renewal Team, Inc.	CSBG Expenditure Domains - Elimination of Services Supporting Multiple Domainsthe current report) will create a budgeting and programmingconcern for CRT. CRT currently operates programs andallocates resources to services supporting multiple domains.Replacing this section with a Transportation Domain does notfully allow CRT to report on the outcomes that span multipleprograms and resources assisting our clients. Does not fullyshow the dynamic and in_depth work done with clients ..Transportation seems like such a small portion of CAA workthat it does not require its own domain, but instead can beincorporated into	Request Change Not Accepted	OCS reviewed all of the technical assistance requests and the utilization of indicators writ large in reporting and there were significant issues with validity of the data reported for services supporting multiple domains in addition to the burden placed on local and state agencies to correctly capture this data point, OCS prioritized the burden reduction and removed this indicator from federal reporting requirements. OCS emphasizes that the removal of the federal requirement to report does not preclude states and local agencies from collecting the data and using for their own needs.
1173	Julia Ackerman	Community Renewal Team, Inc.	Federal Resources - CRT receives significant funding to work with Veteran andVeteran Families.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
1174	Julia Ackerman	Community Renewal Team, Inc.	CRT provides School Readiness and Child Day Care services to both infants and toddlers {0-3) and preschool (4-6). Due to community need, CRT has re-allocated and/or expanded slots to increase the demand for infant and toddler slots. This should be reported and reflect like how the report separates Early Head Start and Head Services into 2 SRVs.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1175	Julia Ackerman	Community Renewal Team, Inc.	Additionally, CT has changed the age for kindergarten which means that CT's early care and education services will be potentially serving children up to age 6. Beginning in the 2024-25 school year, CT requires that all children enrolling in kindergarten turn 5 years old by Sept. 1. Lawmakers approved the kindergarten age change during the 2023 legislative session.	Request Change Not Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
1176	Julia Ackerman	Community Renewal Team, Inc.	CRT provides extensive financial literacy and capability skill training programming to our clients. Elimination of VITA/EITC and other tax preparation programs does not fully reflect the impact of the work done by CAAs. These programs provide CRT with an opportunity to reach a target audience and encourage clients to take advantage of CRT offered financial management training.	Alternative Response	OCS accepts this edit and has added VITA as a countable service for SRV 3a and will include this in the supplemental manual and training upon OMB approval.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1177	Julia Ackerman	Community Renewal Team, Inc.	CRT has provided significant amounts of client assistance including financial coaching and counseling, rent payments, security deposit payments, and mortgage payments. Combining them into one SRV, does not help measure the impact of each of the different services.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1178	Julia Ackerman	Community Renewal Team, Inc.	CRT works closely with the Hartford CT Police Department and Emergency Response System providing on-call services to non-violent police calls. This is a new community level initiative that provides critical services to clients who are experiencing mental health, substance use and/or family conflict issues. By sending out trained clinical professionals combined with a Peer Responder we are better equipped to help individuals in distress access appropriate services than the Police Departments are not trained or capable of dealing with. This is a new model of care that is being rolled out in cities across the nation. CRT responds to close to	Request Change Accepted	OCS acknowledges this comment. Revisions to SRVs 5k-5m examples to illustrate and allow reporting of crisis responses.
1179	Julia Ackerman	Community Renewal Team, Inc.	In the current report format there was a SRV category Family Skills Development and SRV 5mm Parenting Classes. This has been removed in the proposed new report. CRT works closely with our clients to address holistic family dynamics and goals. Vital to these services is services to single head of households both male and female, grandparents reparenting their grandchildren and work with formerly incarcerated individuals. The services that we provide parenting classes strengthen family dynamics, reunify, and strengthen parent/child bonds and encourage a strong foundation for parents to raise healthy children.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1180	Julia Ackerman	Community Renewal Team, Inc.	With the aging of our population providing services and resources to keep seniors in their homes and out of costly nursing home facilities is vital for our seniors. CRT provides several programs aimed at improving the quality of life for seniors in our community. In addition to addressing malnutrition, transportation, social isolation/loneliness these types of programs increase the quality of life for seniors, improves outcomes for seniors, reduces costly medical services and prevents premature institutionalization. The new report format eliminates the FNPI associated with this programming. CRT consistently reports over 3,500+ annually	Request Change Accepted	OCS acknowledges this comment and has restored the independent living siutation indicator for seniors.
1181	Julia Ackerman	Community Renewal Team, Inc.	Inherent in the work that is done at CRT is assisting individuals and families across the life span. We do not provide services in isolation -families who come to CRT for assistance with Child Care are assessed and referred to other agency services that they may need and/or be eligible for. This is our model of service delivery for all Agency programs. Eliminating this domain and incorporating some of the services among the other domains does not fully document the complexity of the achievement of multiple client outcomes. The foundation for this type of work is case management, which at CRT is provided by qualified and certified staff	Alternative Response	OCS acknowledges and appreciates this feedback. There are services in the current Services Supporting Multiple Domains (such as Child Care Subsidies/Payments, Day Centers, clothig assistance) that have been restructured into other domains. OCS reviewed the last five years worth of data submissions and technical requests and several of the services presented here were either underutilized or created a burden with capturing the correct unduplicated count. Therefore, OCS has removed them from the federal reporting requirement to minimize the collective
1182	Julia Ackerman	Community Renewal Team, Inc.	Gender specific head of households with children is a valuable statistical data element. CRT has programming specifically targeting women and men. Women's Empowerment Center and Fatherhood Parenting, Employment and Case Management. Additionally, we are seeing increases in the number of single parent Male households accessing CRT services include our homeless shelter.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1183	Julia Ackerman	Community Renewal Team, Inc.	Identification of the different sources of income by households shows the complexity of the families we serve. Families served by CRT often have multiple jobs combined with other sources in order to maintain an independent living arrangement-this report data allows us to show the full picture of the families that receive services.	Request Change Accepted	OCS has restored the income source in the instrument.
1184	Julia Ackerman	Community Renewal Team, Inc.	CRT did not see this section addressed on the Indicator Disposition Report. This section allows CRT to report fully on the programs operated by the agency. Due to program requirement and data integration we are unable to report the total number of clients that receive Elderly Nutrition Services (approximately 4,500 clients per year) and our utility funded weatherization program (500-900 households per year). Being able to show an aggregate number of clients receiving services allows us to share with constituents the full picture of CRT's impact in the community.	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an 'other' with requirement of description.
1185	Paige Teegarden	CSST Software, LLC	The reported data points need to capture the breadth of interventions and their relevance to reducing poverty, revitalizing communities and empowering individuals and families. While cutting the number of SRVs may be laudable, it also reduces the ability for agencies to report on the diversity of what they do.	Request Change Not Accepted	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1186	Paige Teegarden	CSST Software, LLC	Further, by proposing the following FNPIs while removing others such as "FNPI 2b The number of children (0 to 5) who demonstrated skills for school readiness", OCS is removing the connection between intervention and outcome that helps solidify the link to legislative purpose. o FNPI 2a. The number of young children (0- 5) enrolled in childcare or early childhood education services. o FNPI 2b. The number of youth actively connected to education and skills development programs o FNPI 2e. The number of individuals who enrolled in a post-secondary degree program (e.g., associates, bachelors, etc.)	Alternative Response	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job
1187	Paige Teegarden	CSST Software, LLC	The following proposed FNPIs conceptually belong in Services. By moving them into FNPIs (which the network understands as Outcomes), you are confusing the line between service intervention (as measured by outputs) and outcomes. o FNPI 4f. The number of individuals served with energy assistance and/or energy efficiency homes. o FNPI 4g. The number of individuals served with improved water safety in their homes. o FNPI 5c. The number of individuals receiving reproductive services. o FNPI 5d. The number of individuals receiving wellness services. o FNPI 5e. The number of older adults (age 65+) receiving home visiting	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language.
1188	Paige Teegarden	CSST Software, LLC	. We strongly suggest that OCS remove the optional ability to report using 3.0 definitions for the 2025 Program Year.	Request Change Not Accepted	OCS acknowledges this comment and shares that during the two-year phased implementation, we will increase our training and technical assistance on these reporting structures.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1189	Paige Teegarden	CSST Software, LLC	Since the 3.0 Updates have an “Anticipated OMB Clearance: Winter 2024”, there is literally no way that software vendors can have made adjustments to the way data is collected by the start of the reporting period, October 1, 2024. o OCS and the national partners have been messaging that data collection is the critical foundation for good reporting. And good data governance practices backup this message. o The current proposal, “allows” states to begin reporting using the 3.0 data definitions in the 2025 Program Year as stated in Dear Colleague Letter. Further, it is proposed that the program year for all states begins October 1st. This	Alternative Response	OCS acknowledges this comment and shares that during the two-year phased implementation, we will increase our training and technical assistance on these reporting structures and as we currently provide the coding for databases at no-cost, we will continue to so systems can be updated to reflect the collection of information. OCS also emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds
1190	Paige Teegarden	CSST Software, LLC	The Critical need for Data Definitions is not accounted for in the timeline. In general, OCS has worked with NASCSP (and other members of the network) after the OMB approval process to provide minimal guidance about data definitions. As a vendor who is responsible for translating those data definitions into clear options for data entry, I can tell you those minimal definitions have not been sufficient. The timeline that is proposed in the Dear Colleague letter does not allow for even minimal guidance. This will impact the quality of the data reported. o An example of proposed items that need definition: “FNPI 5b. The number of	Request Change Not Accepted	OCS acknowledges this comment and shares that during the two-year phased implementation, we will increase our training and technical assistance on these reporting structures.
1191	Paige Teegarden	CSST Software, LLC	eorder of sections and renumbering has a significant burden on software vendors in addition to causing confusion among members of the network. o When data is being pulled from databases for the purposes of reporting, developers need a means of identifying what piece of data OCS is referencing and it needs to be an identifier controlled and referenced by OCS. The OLDC Codes provided in the xsd schema OR the prefixes such as FNPI 1.a are the obvious choices for uniquely identifying each piece of data. o By Changing the order of Module 4 to Module 3 and by changing a large number of the “numbers” associated with the data, it	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
1192	Paige Teegarden	CSST Software, LLC	Removing ability to report people in services where that data set can not be deduplicated. o Continuing to focus attention on deduplication of clients is important. While it can be challenging to get to deduplicated numbers of people, the focus on this has led to improvements in overall data capacity in the network and an awareness of the challenges of de-siloing data across more of the network o However, removing the ability to report these data sets is detrimental and will lead to a reduction in overall understanding of what percentage of clients agencies are able to deduplicate.	Request Change Not Accepted	OCS acknowledges this comment. For FNPIs, Annual Report 2.1 asked for unduplicated counts of individuals reporting outcomes, so there should be no change to the burden associated with collecting this information. For SRVs, notes all service counts are no longer based solely on the number of unduplicated individuals served but are flexible for different units of measurement.
1193	Paige Teegarden	CSST Software, LLC	The Service to Outcome Plan is an interesting attempt to provide guidance to the network about the types of service interventions that may lead to specific outcomes and to make it clear that in some cases which are marked as “concrete support” there is no anticipated outcome. This guidance is helpful, particularly the addition of concrete support, and is in line with the tradition of logic models taught in ROMA. While I believe that it is helpful guidance, it is also simplistic in its understanding of the mix of interventions that may be necessary to achieve outcomes. Work done by the Annie E Casey Foundation around ‘bundled services’	Request Change Not Accepted	OCS reviewed all of the technical assistance requests and the utilization of indicators writ large in reporting and there were significant issues with validity of the data reported for services supporting multiple domains in addition to the burden placed on local and state agencies to correctly capture this data point, OCS prioritized the burden reduction and removed this indicator from federal reporting requirements. OCS emphasizes that the removal of the federal requirement to report does not preclude states and local agencies from collecting the data and using for their own needs.
1194	Martina Roe	Gateway Community Services Organization, Inc.	Gateway Community Action offers a recommendation to maintain the use of the annualreport 2.1. If this is not feasible, financial assistance will be required to support in updatingsoftware systems and providing training and technical assistance. Additionally, increasedfunding to our agency will be necessary to alleviate the increased workload.	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1195	Martina Roe	Gateway Community Services Organization, Inc.	If our annual report cannot be used to collect outcome results, it will become morecumbersome to our agency when the state and state associations have to contact us tocollect the necessary information. This will create a burden for both the state and ouragency due to the additional amount of time required to collect data. We anticipate challenges with the upcoming launch of the OCS Dashboard. If we fail to highlight the outcomes of our services instead group them together, how will this impactthe perception of our work by the public, legislators, and other funding sources?	Alternative Response	OCS acknowledges this comment and appreciates the feedback. The report revisions were to ensure we addressed the expansive nature of performance measures across CSBG while meeting the requirements of the CSBG Act, the findings of the CSBG Government Accountability Office (GAO) report, and minimize the burden on the public under the Paperwork Reduction Act.
1196	Martina Roe	Gateway Community Services Organization, Inc.	Modifying the language used in describing outcomes to be more service may downplaythe achieved. There are worries the FNPI and services losing their quality andeffectiveness, which could make it challenging for our agency to address obstacles andaccurately showcase the strides we've taken in helping individuals attain economicstability. We recommend that FNPI's are reflective of our outcomes-orientation and do notmix outputs and outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of indicators with directional language.
1197	Martina Roe	Gateway Community Services Organization, Inc.	We often use the ALL Characteristics Reports to assist us when applying for specificgrants. If the Single Parent Female and Single Parent Male is removed, our agency willlose data necessary to conduct daily operations.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1198	Martina Roe	Gateway Community Services Organization, Inc.	Additionally, we recommend maintaining the All Characteristics Report: Income Source asthis report also allows us to identify our clients by income status and report to fundingentities.	Request Change Not Accepted	OCS has restored the income source in the instrument.
1199	Martina Roe	Gateway Community Services Organization, Inc.	The changes are designed to reduce the burden on our team, yet there are areas where the newrequirements might inadvertently increase workload or complexity for certain departments.e The Kentucky State Office has declared that they will not transition to the federal fiscalyear, which will prevent us from aligning correctly with module two.	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
1200	Martina Roe	Gateway Community Services Organization, Inc.	The proposed change in module format may cause confusion for our staff. We recommendthat retaining the current module numbering system would be more beneficial.	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1201	Martina Roe	Gateway Community Services Organization, Inc.	The expenses relating to upgrading software systems may prove to be quite substantial, posing a significant financial burden to our agency	Alternative Response	OCS acknowledges this comment and shares that during the two-year phased implementation, we will increase our training and technical assistance on these reporting structures and as we currently provide the coding for databases at no-cost, we will continue to so systems can be updated to reflect the collection of information. OCS also emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds
1202	Martina Roe	Gateway Community Services Organization, Inc.	The metric for the number of unemployed adults who obtained employment has beenremoved as an FNPI. This indicator is crucial for CSBG eligible entities and is included inthe CSBG Act. Given its importance, obtaining employment should be included, and additional services explaining how employment was obtained should be added (e.g., JobReadiness Training, Resume Development, Interview Skills Training, etc.).	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1203	Martina Roe	Gateway Community Services Organization, Inc.	SRV 3d —-We recommend moving the number of individuals receiving transportationservices supporting income and asset building (e.g., bus vouchers or passes to trainings)to Domain 7: Transportation.	Alternative Response	OCS appreciates the feedback. The transportation domain uses the actual transportation service as the unit of measurement. This has been revised to be more clear. For example, it's the number of gas cards, vouchers, rides, etc. vs. the number of people.
1204	Martina Roe	Gateway Community Services Organization, Inc.	NPI 3b—We recommend adding a SRV for individuals who opened savings accounts/IDAsand other asset-building accounts under the number of individuals who opened a savingsaccount.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1205	Martina Roe	Gateway Community Services Organization, Inc.	NPI 3c —We recommend adding a SRV for individuals who received homebuyercounseling and other home buying support services under the number of individuals whopurchased a home,. Although these services may be covered under the new SRV 3b, wewould find it challenging to accurately demonstrate our progress in assisting individualstoward economic security.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1206	Martina Roe	Gateway Community Services Organization, Inc.	SRV 4g — The number of households receiving weatherization services does notnecessarily align with FNPI 4f (The number of individuals served with energy assistanceand/or energy-efficient homes.) Energy assistance includes services like LIHEAP andshould not be included in weatherization services.	Alternative Response	OCS acknowledges this comment. As noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1207	Martina Roe	Gateway Community Services Organization, Inc.	FNPI 4 — Is it assumed that the number of individuals served with improved water safetyin their homes would be achieved if someone received water safety services included inSRV 4f (The number of individuals receiving housing maintenance and improvementservices? We recommend clarification.	Request Change Accepted	OCS will update this in all training materials to clarify.
1208	Martina Roe	Gateway Community Services Organization, Inc.	Leadership Training was removed from the services and we feel leadership training is astrategic investment that yields significant benefits across various dimensions of anyorganization, from enhancing performance and innovation to improving employeeengagement and retention.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1209	Martina Roe	Gateway Community Services Organization, Inc.	SRV 3d — The number of individuals receiving transportation services supporting incomeand asset building (e.g., bus vouchers or passes to training). Should this be moved toDomain 7: Transportation?	Alternative Response	OCS appreciates the feedback. The transportation domain uses the actual transportation service as the unit of measurement. This has been revised to be more clear. For example, it's the number of gas cards, vouchers, rides, etc. vs. the number of people.
1210	Martina Roe	Gateway Community Services Organization, Inc.	Why was Case Management, referrals, and eligibility determinations removed? Removingservices under Multiple Domains reduces the scope of our work.	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
1211	Martina Roe	Gateway Community Services Organization, Inc.	2a—The number of young children (0-5) enrolled in childcare or early childhood education services is an output, not an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1212	Martina Roe	Gateway Community Services Organization, Inc.	2b — The number of youth actively connected to education and skills developmentprograms is a service, not an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1213	Martina Roe	Gateway Community Services Organization, Inc.	2e — The number of individuals who enrolled in post-secondary degree programs (e.g.,associate's, bachelor's, etc.). Again, enrolling does not equate to achieving, therefore, thisis a service.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1214	Martina Roe	Gateway Community Services Organization, Inc.	Income and asset building 3a—Completing a training does not necessarily mean achieving an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1215	Martina Roe	Gateway Community Services Organization, Inc.	NPI 3b does not have services to match this indicator.	Request Change Accepted	OCS will release supplemental materials and guides to provide more training and explanatory language.
1216	Martina Roe	Gateway Community Services Organization, Inc.	FNPI 4f — “served with energy assistance” was a Weatherization outcome. It appears asif it may now include LIHEAP assistance. If this is the case, LIHEAP assistance is anoutput (service), not an outcome.	Request Change Accepted	OCS has made revisions to indicators that provide a more structured directional language to measure outcomes across the domains.
1217	Martina Roe	Gateway Community Services Organization, Inc.	FNPI 4g — Is “Individuals served with improved water safety in their homes” related to LIHWAP? If so, individuals served would be an output (service), not an outcome.	Request Change Accepted	OCS has made revisions to indicators that provide a more structured directional language to measure outcomes across the domains.
1218	Martina Roe	Gateway Community Services Organization, Inc.	Domain 5 only includes outputs (services). We are in the business of tracking outcomesas it is our role to help individuals gain economic stability. Outputs are included in FNPI5b, FNP! 5c, FNPI 5d, FNPI 5e, FNP! 5g, FNPI 5h, and FNPI 5i. We recommend revisingthis domain to include outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of indicators with directional language.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1219	Katherine Harrington	Iowa Community Action Association	With the OCS proposed changes, Iowa Community Action Agencies still have to pull program data from a variety of software systems, therefore the burden will not be reduced much without addressing this difficulty	Alternative Response	OCS acknowledges this comment and appreciates the feedback, the state systems are outside of our purview but OCS has invested in the CSBG Performance Management Website which provides a dynamic display of data submitted to the federal office.
1220	Katherine Harrington	Iowa Community Action Association	Because unduplicated counts are required, there is a high rate of underreporting.	Request Change Not Accepted	OCS is ensuring we are responding to the findings from the Government Accountability Office (GAO) utilizing the total number served to capture totals for national performance reporting. For FNPIs, Annual Report 2.1 asked for unduplicated counts of individuals reporting outcomes, so there should be no change to the burden associated with collecting this information. OCS has revised the SRVs to be more flexible, which may in part address the concern.
1221	Katherine Harrington	Iowa Community Action Association	The Iowa Community Action Network would like to see a mix of Outcome Reporting (Through Individual/Family/Community NPIs) and Output Reporting through Individual and Family Services (ideally allowing for duplicated counts as it is more reflective of actual effort by CAAs)	Alternative Response	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1222	Katherine Harrington	Iowa Community Action Association	ICAA encourages OCS to collaborate with more intentionality with the Community Action Network to develop a workable report for local, state, and national needs. Methods for collaboration could include an advisory panel or regional focus groups to get a clearer understanding of scope, diversity and impact.	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an
1223	Katherine Harrington	Iowa Community Action Association	Many of OCS's proposed changes replace outcome statements with outputs – the receipt of services. Therefore, our recommendations are to keep or modify NPIs so that they are measurable outcomes achieved by customers and not outputs.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1224	Katherine Harrington	Iowa Community Action Association	OCS' proposed change is to remove FNPI 1b, The number of unemployed adults who obtained employment (up to a living wage). Our suggestion is to modify FNPI 1b to state: The number of unemployed adults who obtained employment.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1225	Katherine Harrington	Iowa Community Action Association	OCS' proposed change to FNPI 2a, The number of children (0 to 5) who demonstrated improved emergent literacy skills, to change it to The number of young children (0-5) enrolled in childcare or early childhood education services, does not provide clarity or quality in the data being reported. We recommend leaving the FNPI in its original version.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1226	Katherine Harrington	Iowa Community Action Association	OCS' proposed change to FNPI 2b, The number of children (0 to 5) who demonstrated skills for school readiness, to change it to The number of youth actively connected to education and skills development programs, does not provide clarity or quality in the data being reported."Actively connected" is a service, not an outcome. OCS could consider, The number of youth actively connected to education and skills development programs who are achieving milestones.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language.
1227	Katherine Harrington	Iowa Community Action Association	Keep FNPI 2f, The number of adults who demonstrated improved basic education.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1228	Katherine Harrington	Iowa Community Action Association	OCS' proposed FNPI 2e, The number of individuals who enrolled in a post-secondary degree program (e.g., associates, bachelors, etc.), is an output, not at outcome. Eliminate proposed FNPI 2e.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1229	Katherine Harrington	Iowa Community Action Association	OCS' proposed FNPI 3a, The number of individuals completing income and asset building training, is an output, not an outcome. Eliminate this NPI and keep FNPI 3h The number of individuals engaged with the Community Action Agency who report improved financial wellbeing	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1230	Katherine Harrington	Iowa Community Action Association	Keep FNPI 4h, The number of individuals with improved energy efficiency and/or energy burden reduction in their homes. Changing it to (FNPI 4f) The number of individuals served with energy assistance or energy efficiency homes is an output, not an outcome. Or consider, number of individuals who avoided utility disconnect.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1231	Katherine Harrington	Iowa Community Action Association	Becomes FNPI 5b. The number of individuals with access to health coverage. Restructured indicators to measures with service delivery. SUGGESTED CHANGE: The number of individuals who have health coverage.Becomes FNPI 5c. The number of individuals receiving reproductive services. Restructured indicators to measures with service delivery. SUGGESTED CHANGE: number of individuals who have improved skills, knowledge, related to maternal/child health.Becomes FNPI 5d. The number of individuals receiving wellness services. Restructured indicators to measures with service delivery. SUGGESTED CHANGE: Number of individuals	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language.
1232	Katherine Harrington	Iowa Community Action Association	Do Not Remove original FNPI 5f, The number of seniors (65+) who maintained an independent living situation. Supporting senior independent living is an important part of the Community Action portfolio.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1233	Katherine Harrington	Iowa Community Action Association	Recommend keeping something to capture the sphere of these three items for Community Action Agencies who do this important work:Original FNPI 5g, The number of individuals with disabilities who maintained an independent living situation.Original FNPI 5h, The number of individuals with a chronic illness who maintained an independent living situation.Original FNPI 5i, The number of individuals with no recidivating event for six months.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1234	Katherine Harrington	Iowa Community Action Association	Why must we have unduplicated numbers and households served? With bundled services, it makes much more sense to provide a full picture of all services provided to households, not just the numbers served. Community Action Agencies bundle services to really have an impact and that should be a part of the reporting process.	Request Change Not Accepted	OCS is ensuring we are responding to the findings from the Government Accountability Office (GAO) utilizing the total number served to capture totals for national performance reporting. For FNPIs, Annual Report 2.1 asked for unduplicated counts of individuals reporting outcomes, so there should be no change to the burden associated with collecting this information. OCS has revised the SRVs to be more flexible, which may in part address the concern.
1235	Katherine Harrington	Iowa Community Action Association	There will be a data burden and deduplication challenges with the proposed changes to the original SRV 1a-1c Vocational Training, On-the-Job and other Work Experience, Youth Summer Work Placements, 3d First-time Homebuyer Counseling, 3g-l Child Support Payments, Health Insurance, Social Security/SSI Payments, Veteran's Benefits, TANF Benefits, SNAP Benefits. Keep original services for these.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1236	Katherine Harrington	Iowa Community Action Association	SRV 2n The number of individuals attending basic education classes (e.g.: financial literacy) Recommendation: Since the new SRV 3a includes financial literacy as part of the portfolio of services that align with income management, remove the reference to financial literacy in the new SRV 2n.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1237	Katherine Harrington	Iowa Community Action Association	SRV 7 – Recommend keeping the referral and advocacy services	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1238	Katherine Harrington	Iowa Community Action Association	Agree with changes made with the exception of removing the Sources of HH income, other income and non-cash benefits. This data is critical to the CAA story of the families we serve.	Request Change Not Accepted	OCS has restored the income source in the instrument.
1239	Lorie Easter	Community Action Agencies Subdivision, in the Division of Community Access and Eligibility in the Iowa Dep of Health and Human Services	Iowa's CSBG State Office does not believe there will be a decrease in burden by eliminating Section B: Statewide Goals and Accomplishments and Section D: Organizational Standards for CSBG Eligible Entities. The State CSBG Office will need to continue to collect the data from the Eligible Entities for Section B and will have to continue to track the information in Section D to be able discuss or report in the proposed enhanced Federal engagement activities. The CSBG organizational standards are part of the CSBG Performance Management Framework and should be reported in a formal manner to OCS. The Organizational Standards to	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1240	Lorie Easter	Community Action Agencies Subdivision, in the Division of Community Access and Eligibility in the Iowa Dep of Health and Human Services	Iowa's CSBG State Office believes the services supporting multiple domains is a benefit to the annual report. This domain helps tell the CSBG story and allows the network to capture bundled services they provide to individuals and families.	Request Change Not Accepted	OCS reviewed all of the technical assistance requests and the utilization of indicators writ large in reporting and there were significant issues with validity of the data reported for services supporting multiple domains in addition to the burden placed on local and state agencies to correctly capture this data point, OCS prioritized the burden reduction and removed this indicator from federal reporting requirements. OCS emphasizes that the removal of the federal requirement to report does not preclude states and local agencies from collecting the data and using for their own needs.
1241	Lorie Easter	Community Action Agencies Subdivision, in the Division of Community Access and Eligibility in the Iowa Dep of Health and Human Services	A proposed change of concern is the elimination of the Multiple Services domains, under both the Service and NPI sections. The concern is that elimination of these services and NPIs would have the negative consequence of not being able to report the integrated approach to service provision. Many services offered by Eligible Entities assist with holistic services for families and individuals.	Request Change Not Accepted	OCS reviewed all of the technical assistance requests and the utilization of indicators writ large in reporting and there were significant issues with validity of the data reported for services supporting multiple domains in addition to the burden placed on local and state agencies to correctly capture this data point, OCS prioritized the burden reduction and removed this indicator from federal reporting requirements. OCS emphasizes that the removal of the federal requirement to report does not preclude states and local agencies from collecting the data and using for their own needs.
1242	Lorie Easter	Community Action Agencies Subdivision, in the Division of Community Access and Eligibility in the Iowa Dep of Health and Human Services	Several of the eliminated services in this section are key services that the Eligible Entities in Iowa perform. Iowa's State CSBG Offence recommends the following services: Case Management, Eligibility Determination, Referrals, and Mediation/Customer Advocacy not be eliminated.	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1243	Lorie Easter	Community Action Agencies Subdivision, in the Division of Community Access and Eligibility in the Iowa Dep of Health and Human Services	Iowa's State CSBG Office is concerned about the shift from home visiting services to evidence-based visiting programs. Iowa currently reports on several home visitation programs that are Iowa based and have strong outcomes but may or may not meet the evidence-based definition. Iowa recommends that OCS work with the network to establish definitions or provide rationale on what qualifies as evidence based. Eligible Entities have historically been innovative in the services they provide or design program and services at the local level that best meet the needs of their communities.	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an
1244	Lorie Easter	Community Action Agencies Subdivision, in the Division of Community Access and Eligibility in the Iowa Dep of Health and Human Services	The mixture of outputs and outcomes in the NPIs is a departure from the current annual report. The current report focuses on outcomes and changes for the individuals and families, not just the counts (outputs) of what families receive. We recommend that the proposed NPIs be revised to ensure that what is collected is outcomes oriented and the outputs can be captured in the concrete supports or in Section A – Services of the proposed annual report.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1245	Lorie Easter	Community Action Agencies Subdivision, in the Division of Community Access and Eligibility in the Iowa Dep of Health and Human Services	Iowa's CSBG State Office recommends retaining the household income source data point in demographics reporting to ensure the accurate representation of the economic impact of services provided by eligible entities and to maintain critical insights into the economic conditions of the populations served.	Request Change Not Accepted	OCS has restored the income source in the instrument.
1246	Lorie Easter	Community Action Agencies Subdivision, in the Division of Community Access and Eligibility in the Iowa Dep of Health and Human Services	Iowa's CSBG State Office recommends retaining the ability to report datasets that cannot be deduplicated to ensure a comprehensive and accurate representation of the impacts of the eligible entities. Unduplicated counts continue to be a challenge for Eligible Entities because this requirement is very difficult to meet. Eligible entities must operate multiple data systems for the numerous programs they administer, and most of these systems do not have interoperability functionality. To obtain an unduplicated count requires double data entry for most Eligible Entities or bringing together the data in another program, such as Excel, to	Request Change Not Accepted	OCS is ensuring we are responding to the findings from the Government Accountability Office (GAO) utilizing the total number served to capture totals for national performance reporting. OCS has revised the SRVs to be more flexible, which may in part address the concern. OCS may want to point out that unduplicated counts of individuals were required in Annual Report 2.1, so this does not represent a change.
1247	Lorie Easter	Community Action Agencies Subdivision, in the Division of Community Access and Eligibility in the Iowa Dep of Health and Human Services	Iowa's CSBG State Office recognizes that the inclusion of Concrete Supports is a positive addition in the CSBG Annual Report. Providing concrete supports is a critical service that Eligible Entities perform to stabilize individuals and families. The inclusion of the new Transportation Domain is also a positive addition to the report.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1248	Lorie Easter	Community Action Agencies Subdivision, in the Division of Community Access and Eligibility in the Iowa Dep of Health and Human Services	Iowa's CSBG State Office recognizes that the intent of OCS is to improve the current CSBG Annual report to strengthen the quality and clarity of the information while reducing the burden of the States and Eligible Entities. However, we are concerned that State Offices and the Eligible Entities did not have more involvement in the development of the proposed Report version 3.0.	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1249	Lorie Easter	Community Action Agencies Subdivision, in the Division of Community Access and Eligibility in the Iowa Dep of Health and Human Services	it will be critical that guidance and support be provided to the State CSBG Offices and the Eligible Entities at the beginning of the process if CSBG Annual Report version 3.0 is implemented. This should be in the form of clear instruction and definitions of what is being collected to ensure that the Report is being implemented consistently across the CSBG Network and adequate training and technical assistance to help with the understanding and implementation of revised report.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1250	Shanta Johnson	Montgomery County Maryland	We would like clarity, as we normally report from contract partner agencies services which are in the areas listed to be removed. The removal will also reduce our ability to report on the bundled services, whole family approach and comprehensive case management services we provide.	Request Change Not Accepted	OCS reviewed all of the technical assistance requests and the utilization of indicators writ large in reporting and there were significant issues with validity of the data reported for services supporting multiple domains in addition to the burden placed on local and state agencies to correctly capture this data point, OCS prioritized the burden reduction and removed this indicator from federal reporting requirements. OCS emphasizes that the removal of the federal requirement to report does not preclude states and local agencies from collecting the data and using for their own needs.
1251	Shanta Johnson	Montgomery County Maryland	We would like additional guidance on what should be included in this section. Is this part of the CSBG application- or the CSBG Annual report or both	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1252	Shanta Johnson	Montgomery County Maryland	The addition of concrete supports are not necessarily linked to an NPI. This decreases the principle that all activities of the agency are expected to produce results	Alternative Response	OCS acknowledges this comment. Concrete supports have traditionally been in the report but have not had a clear delineation into how they may be counted. Research in human and social services highlights the outcome of providing concrete supports lead to a better quality of life because basic needs are met. At the national level, the goal would be shape the reporting narrative by showing all these concrete supports as a performance measure along with the other indicator to tell the broader story. For example, SRV 1c which provides supplies for employment like work boots
1253	Shanta Johnson	Montgomery County Maryland	This reduces the ability to report our key services, including - leadership training, Legal services and citizenship classes.o Again, we are also concerned about case management and referrals not being reported	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
1254	Shanta Johnson	Montgomery County Maryland	This may bring about challenges in reporting- there are some outputs that are outcomes. How do we report these? This will also shift the focus from outcomes to outputs, whichlessens the impacts of the ROMA philosophy.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1255	Shanta Johnson	Montgomery County Maryland	e would like to include navigation services- resource referral. Is this allowable?	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1256	Shanta Johnson	Montgomery County Maryland	Our network understands the need to examine and improve upon our annual reporting and we feel that the best way to ensure that the final, cleared Annual Report 3.0 accurately reflects the needs and realities of the Community Action Network is through the intentional and strategic engagement of the Network in the review and revision process. To this end, we propose that OCS clear and utilize the proposed CSBG Annual Report 2.1, while working closely with the Community Action Network before clearing the revised CSBG Annual Report 3.0. F	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an
1257	Amanda Shelton	Texas Association of Community Action Agencies, Inc.	Our network understands the need to examine and improve upon our annual reporting and we feel that the best way to ensure that the final, cleared Annual Report 3.0 accurately reflects the needs and realities of the Community Action Network is through the intentional and strategic engagement of the Network in the review and revision process. To this end, we propose that OCS clear and utilize the proposed CSBG Annual Report 2.1, while working closely with the Community Action Network before clearing the revised CSBG Annual Report 3.0. F	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an
1258	Amanda Shelton	Texas Association of Community Action Agencies, Inc.	Our network understands the need to examine and improve upon our annual reporting and we feel that the best way to ensure that the final, cleared Annual Report 3.0 accurately reflects the needs and realities of the Community Action Network is through the intentional and strategic engagement of the Network in the review and revision process. To this end, we propose that OCS clear and utilize the proposed CSBG Annual Report 2.1, while working closely with the Community Action Network before clearing the revised CSBG Annual Report 3.0. F	Request Change Not Accepted	OCS has restored the income source in the instrument.
1259	Amanda Shelton	Texas Association of Community Action Agencies, Inc.	Publishing the data specification well in advance of the collection, ensuring enough time for changes to systems and operational processes for implementation, testing,and completion. TACAA is concerned with the timeline required to fully implement Annual Report 3.0. The concern is heightened by the fact that each Texas CAA has its own reporting system(s), which are deeply integrated into its operational systems to achieve maximum efficiency.	Alternative Response	OCS acknowledges this comment and shares that during the two-year phased implementation, we will increase our training and technical assistance on these reporting structures and as we currently provide the coding for databases at no-cost, we will continue to so systems can be updated to reflect the collection of information. OCS also emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds
1260	Amanda Shelton	Texas Association of Community Action Agencies, Inc.	Publishing high-quality, timely documentation/tools that are clear, unambiguous,and easy to navigate. State Administrators and/or Associations should not be required to individually interpret the definition of each revised or new standard.Finally, it is important to note that without OCS enforcing uniformity across state administrators who are responsible for data implementation and oversight, the network of local entities will not maintain quality in the data collection process	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1261	Amanda Shelton	Texas Association of Community Action Agencies, Inc.	Supporting the specification through the provision of high-quality in-person trainingand webinars	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1262	Amanda Shelton	Texas Association of Community Action Agencies, Inc.	TACAA recognizes OCS's effort to evaluate and reduce the activities above and beyond business as usual necessary to meet external data requirements, also known as data burden. One critical factor in evaluating the data burden, which may have been neglected in the review process of Annual Report 3.0, is the significant impact of a state's discretion in performance reporting requirements imposed on the subgrantees/CAAs	Alternative Response	OCS acknowledges this comment and appreciates the feedback, the state systems are outside of our purview but OCS has invested in the CSBG Performance Management Website which provides a dynamic display of data submitted to the federal office.
1263	Amanda Shelton	Texas Association of Community Action Agencies, Inc.	TACAA has reviewed the Annual Report 3.0 and concluded that specific areas aimed at reducing data burden may concurrently impair the report's purpose as stated in the CSBG Act, resulting in the loss of significant, relevant, and necessary data points. These data points serve to raise the impact of the community action agencies and their effective work to address the complexities of povertyWith the removal of data points in Annual Report 3.0, TACAA is requesting clarity on OCS's intention to capture the same relevant information either (1) through inclusion in new performance indicators or (2) through derivations or computations from	Alternative Response	OCS acknowledges this comment. This information can be found in the indicator disposition report.
1264	Amanda Shelton	Texas Association of Community Action Agencies, Inc.	TACAA expects the change in the reporting year to be a significant burden to implement. Without funding for system improvements at the state and agency levels, this shift in behavior, fiscal management, and expected reporting in the next 24 months will significantly affect existing systems. TACAA requests that OCS provide clarity on the Federal Fiscal Year reporting standard. Specifically, how will misalignment in timing be explained or treated in congressional reports? The Federal Fiscal Year period, compared to the block grant award period versus the CAA contract period, each has three distinct, noncongruent schedules and	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
1265	Juan Rodriguez	South Texas Development Council	STDC strongly feels that OCS has not fully adhered to collaboration with State and Local agencies in developing, or in this case updating the model performance measurement system. NCAP has also addressed this concern in their comment's submission (pg. 3, line 3: Meaningful Engagement; and pg. 5 § III. NCAP Supports a robust regulatory review process for changes to the CSBG annual report information collection request (ICR)). The current process utilized by OCS did not include engagement with state and local agencies to conduct a review of the current performance management measures prior to releasing the proposed	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an
1266	Juan Rodriguez	South Texas Development Council	STDC strongly encourages OCS to keep Output reporting measures listed as Services and Outcome reporting measures that bring about change to be reported as FNPIs. STDC strongly supports NCAP's comments on the proposed revisions to Sectoin B FNPIs that reflect outputs rather than outcomes in the CSBG Annual Report Version 3.0, Module 3	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1267	Juan Rodriguez	South Texas Development Council	TDC, however, disagrees with some of the eliminated measures. Specifically, as it relates to the employment measures, job attainment is a common and essential milestone for families and individuals because of Community Action intervention, but we do not agree that there should be a diU erentiation of living wage vs nonliving wage employment obtainment nor with the number of unemployed adults who maintained employment for 90/180 days. We would request that a FNPI capturing “The number of unemployed adults who obtained employment” should be retained. Similarly, STDC would encourage OCS to consider	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1268	Juan Rodriguez	South Texas Development Council	Lastly, we do agree with OCS on streamlining the demographic report with the elimination of Income Source in Household Demographics. While we appreciate NCAPs comments on the potential value to keep D.13, D.14 and D.15, from a data analysis perspective, these measures add little context to the holistic picture of who is receiving services by CAAs. D. 13 would need to be restructured for clarity if it is retained, because the D. 14 Other Income Sources is a combination of public and private income sources. D. 14 would need additional data definitions and increased metric subsections to be added in order for this section to add value in	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1269	Juan Rodriguez	South Texas Development Council	STDC supports NCAP’s comments as it relates to Clarity (NCAP Comments Submission pg. 28 § VII. Clarity). STDC agrees that OCS has not provided suU icient instructions and guidance on how OCS interprets the data points for the network to fully understand what data should be reported where. While it was noted that OCS would engage with the network and partners to develop guidance post adoption, this approach appears to prioritize subsequent steps before foundational actions are completed. OCS, and the network of state, local, and national partners need to have a clear footing of how each performance measure	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1270	Juan Rodriguez	South Texas Development Council	STDC wishes to emphasize that any revisions to the current reporting structure will impact existing data systems utilized by local eligible entities and incur costs in order to program these revisions into data systems used by both State and Local agencies. The State agencies will need to update their current collection systems to adjust to the federal requirements, while local agencies will probably incur higher costs with system configurations. Local agencies that have their own data systems, like STDC, will need additional resources to cover costs for configuration as our data system is mapped to capture activity based on individual and family	Alternative Response	OCS acknowledges this comment and emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds cooperative agreements with the National Association of State Community Service Program (NASCSP) to create custom forms with coding so each local agency has a tool to submit the data at no cost to them. Systems used at the local level for reporting are not under the purview of the
1271	Juan Rodriguez	South Texas Development Council	Texas is one of many states that does not report on a federal fiscal year, and currently follows a calendar year for reporting. To compound the issue, while most states may report on a quarterly, semi-annual, or annual basis, agencies in Texas are required to report on a monthly basis. The transition from one performance period to another that would align with the federal fiscal year will impost undue burden on the state administrative agency to shift contract periods as well as local agencies to shifting one month to another. STDC would request that OCS consider establishing uniform reporting guidelines for all states around reporting intervals	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we’re using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
1272	Juan Rodriguez	South Texas Development Council	STDC would encourage OCS to take into account the reporting methodologies currently in place for each individual state. A	Alternative Response	OCS acknowledges this comment and appreciates the feedback, the state systems are outside of our purview but OCS has invested in the CSBG Performance Management Website which provides a dynamic display of data submitted to the federal office.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1273	Juan Rodriguez	South Texas Development Council	TDC agrees with revision to FNPI1a. The number of unemployed youth who increased skills to obtain employment.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1274	Juan Rodriguez	South Texas Development Council	STDC recommends revision to: The number of unemployed youth who obtained employment	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1275	Juan Rodriguez	South Texas Development Council	STDC recommends the recommend FNPI1b. proposal of: The number of unemployed adults who increased skills to obtain employment.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1276	Juan Rodriguez	South Texas Development Council	STDC recommends consolidation of former FNPI 1c-g. to: The number of unemployed adults who obtained employment.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1277	Juan Rodriguez	South Texas Development Council	STDC would agree for this measure to become FNPI 1e.: The number of employed individuals who increased income from employment through a wage or salary amount increase.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1278	Juan Rodriguez	South Texas Development Council	STDC agrees with removal of FNPI 1h.1-3 and FNPI1z.1	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1279	Juan Rodriguez	South Texas Development Council	STDC would recommend consolidating Version 2.1 FNPI a-b: The number of young children (0-5) who demonstrated emergent literacy or school readiness skills.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1280	Juan Rodriguez	South Texas Development Council	STDC disagrees with revision. The proposed revision would reduce the tracked measure from outcome to output (FNPI to Service).	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language.
1281	Juan Rodriguez	South Texas Development Council	STDC agrees with removal of FNPI 2c-f (including subsections)	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1282	Juan Rodriguez	South Texas Development Council	STDC agrees with numbering sequence change of FNPI 2g-h	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1283	Juan Rodriguez	South Texas Development Council	STDC disagrees with revision. The proposed revision would reduce the tracked measure from outcome to output (FNPI to Service	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language.
1284	Juan Rodriguez	South Texas Development Council	STDC agrees with revision as a consolidation of Version 2.1 FNPI 2i and 2j.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1285	Juan Rodriguez	South Texas Development Council	STDC agrees with removal of FNPI 2z	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1286	Juan Rodriguez	South Texas Development Council	STDC agrees with revisions of FNPI 4h and 6a	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1287	Juan Rodriguez	South Texas Development Council	STDC agrees with revisions to SRV 1a-o, SRV 1p, and SRV 1q	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1288	Juan Rodriguez	South Texas Development Council	STDC recommends revision to state SRV2e. The number of individuals receiving K-12 Education and/or Support Services (English, literacy, etc.). Number sequence change. STDC would caution that this item would require a service definition to ensure standardization across the national network, especially if it's meant to merge Version 2.1 SRV 2d and 2e.	Request Change Accepted	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1289	Juan Rodriguez	South Texas Development Council	STDC agrees with revisions to SRV2 r-s, SRV 2u, SRV2x, SRV2y -bb, SRV 4a -t, SRV 6a-f, SRV7a-c	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1290	Juan Rodriguez	South Texas Development Council	STDC agrees it should remain, however, would caution the use of "(e.g.: financial literacy). Again, this item would require a service definition to ensure standardization across the national network. Could potentially incorporate SRV2v as well.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1291	Juan Rodriguez	South Texas Development Council	See SRV2t comment above or could also be incorporated into new proposed SRV2q (life skills and coaching services	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1292	Juan Rodriguez	South Texas Development Council	SRV2cc-STDC cautions proposed revision. Again, this item would require a service definition to ensure standardization across the national network. Home visits at one point were used to track visits to individual's homes that were enrolled in an educational program and then became disconnected or stopped attending.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1293	Juan Rodriguez	South Texas Development Council	STDC agrees with revisions to sections C and D	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1294	Jeannie Chaffin	Jeannie Chaffin, LLC	I just wanted to flag that the directions for making comments indicate referencing comments by proposed module, section, and the page number. The document posted on the website with the DCL does not include page numbers.	Alternative Response	OCS appreciates the feedback and recommends the use of the Adobe PDF page counter. The final version transmitted will include embedded page numbers.
1295	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	First, the network appreciates the following changes in the following report and sees them as positive.Module 2: The removal of hours of Agency Capacity Building and the number of staff who hold certifications. These data points have posed an additional burden to Community Action Agencies	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1296	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	First, the network appreciates the following changes in the following report and sees them as positive.Module 3 (individual and Family Level): The addition of "service as concrete support" is seen as beneficial, reflecting the critical work Community Action Agencies (CAA) do to stabilize individuals and families.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1297	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	First, the network appreciates the following changes in the following report and sees them as positive.The inclusion of the new Transportation Domain elevates the recognition of the critical transportation work done by CAAs around the country, although the full impact of this work will likely still be unreportable due to duplication challenges and limitations on what is reportable in Community Level Transformation. (see note in section III)	Alternative Response	OCS appreciates the feedback. The transportation domain uses the actual transportation service as the unit of measurement. This has been revised to be more clear. For example, it's the number of gas cards, vouchers, rides, etc. vs. the number of people.
1298	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	The Annual Report, specifically Module 4 (version 2.0), is designed to collect information on service provision (SRV) and the achievement of results (National Performance Indicators, NPIs). Community Action Agency staff clearly understand the differentiation between services and the impact/changes that were achieved as a result of the service (NPI). It is essential that the language used in NPIs is different from that used in SRVs. However, in the proposed revisions and additions to NPIs concerning individuals and families, this differentiation has become unclear.For example, the following Individual/Family Level National Performance	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1299	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	The Annual Report, specifically Module 4 (version 2.0), is designed to collect information on service provision (SRV) and the achievement of results (National Performance Indicators, NPIs). Community Action Agency staff clearly understand the differentiation between services and the impact/changes that were achieved as a result of the service (NPI). It is essential that the language used in NPIs is different from that used in SRVs. However, in the proposed revisions and additions to NPIs concerning individuals and families, this differentiation has become unclear.For example, the following Individual/Family Level National Performance	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1300	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	The Annual Report, specifically Module 4 (version 2.0), is designed to collect information on service provision (SRV) and the achievement of results (National Performance Indicators, NPIs). Community Action Agency staff clearly understand the differentiation between services and the impact/changes that were achieved as a result of the service (NPI). It is essential that the language used in NPIs is different from that used in SRVs. However, in the proposed revisions and additions to NPIs concerning individuals and families, this differentiation has become unclear.For example, the following Individual/Family Level National Performance	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1301	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	The Annual Report, specifically Module 4 (version 2.0), is designed to collect information on service provision (SRV) and the achievement of results (National Performance Indicators, NPIs). Community Action Agency staff clearly understand the differentiation between services and the impact/changes that were achieved as a result of the service (NPI). It is essential that the language used in NPIs is different from that used in SRVs. However, in the proposed revisions and additions to NPIs concerning individuals and families, this differentiation has become unclear.For example, the following Individual/Family Level National Performance	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1302	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	The Annual Report, specifically Module 4 (version 2.0), is designed to collect information on service provision (SRV) and the achievement of results (National Performance Indicators, NPIs). Community Action Agency staff clearly understand the differentiation between services and the impact/changes that were achieved as a result of the service (NPI). It is essential that the language used in NPIs is different from that used in SRVs. However, in the proposed revisions and additions to NPIs concerning individuals and families, this differentiation has become unclear.For example, the following Individual/Family Level National Performance	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1303	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	The following Individual/Family Level National Performance Indicators (NPIs) proposed to be added refer to services and not to outcomes.• FNPI 5b – The number of individuals with access to health coverage.o Having access to coverage does not mean an improved status	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1304	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	The following Individual/Family Level National Performance Indicators (NPIs) proposed to be added refer to services and not to outcomes.• FNPI 5c – The number of individuals receiving reproductive services. o Receipt of a service is not an outcome	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1305	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	The following Individual/Family Level National Performance Indicators (NPIs) proposed to be added refer to services and not to outcomes.• FNPI 5d – The number of individuals receiving wellness services. o Receipt of a service is not an outcome	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1306	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	The following Individual/Family Level National Performance Indicators (NPIs) proposed to be added refer to services and not to outcomes.• FNPI 5e – The number of older adults (age 65+) receiving home visiting services.o Receipt of a service is not an outcome	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1307	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	The following Individual/Family Level National Performance Indicators (NPIs) proposed to be added refer to services and not to outcomes.• FNPI 5g – The number of adults receiving preventative oral health services.o Receipt of a service is not an outcome	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1308	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	The following Individual/Family Level National Performance Indicators (NPIs) proposed to be added refer to services and not to outcomes.• FNPI 5h – The number of children receiving preventative oral health services. o Receipt of a service is not an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1309	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	The following Individual/Family Level National Performance Indicators (NPIs) proposed to be added refer to services and not to outcomes.• FNPI 5i – The number of individuals receiving access to healthy food options.o Having access to food options does not mean an improved status.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1310	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	In the proposed changes, National Performance Indicators (NPI) have been removed with the objective of reducing burden or increasing clarity. However, some items that are proposed to be removed will reduce the ability of the network to meet proper performance measurement. The FNPI and SRVs identified below are indicators and services that reflect important activities in which many agencies are engaged and should be retained.• National Performance Indicators (NPI):o FNPI 1b - The number of unemployed adults who obtained employment.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1311	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	In the proposed changes, National Performance Indicators (NPI) have been removed with the objective of reducing burden or increasing clarity. However, some items that are proposed to be removed will reduce the ability of the network to meet proper performance measurement. The FNPI and SRVs identified below are indicators and services that reflect important activities in which many agencies are engaged and should be retained.• National Performance Indicators (NPI):o FNPI 5d - The number of individuals who improved skills related to the adult role of parents/ caregivers	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1312	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	In the proposed changes, National Performance Indicators (NPI) have been removed with the objective of reducing burden or increasing clarity. However, some items that are proposed to be removed will reduce the ability of the network to meet proper performance measurement. The FNPI and SRVs identified below are indicators and services that reflect important activities in which many agencies are engaged and should be retained.• National Performance Indicators (NPI):o FNPI 5f - The number of seniors (65+) who maintained an independent living situation	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1313	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	In the proposed changes, National Performance Indicators (NPI) have been removed with the objective of reducing burden or increasing clarity. However, some items that are proposed to be removed will reduce the ability of the network to meet proper performance measurement. The FNPI and SRVs identified below are indicators and services that reflect important activities in which many agencies are engaged and should be retained.• National Performance Indicators (NPI):o FNPI 5g - The number of individuals with disabilities who maintained an independent living situation.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1314	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	In the proposed changes, National Performance Indicators (NPI) have been removed with the objective of reducing burden or increasing clarity. However, some items that are proposed to be removed will reduce the ability of the network to meet proper performance measurement. The FNPI and SRVs identified below are indicators and services that reflect important activities in which many agencies are engaged and should be retained.• Services (SRV):o SRV 5mm - Parenting Classes	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1315	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	In the proposed changes, National Performance Indicators (NPI) have been removed with the objective of reducing burden or increasing clarity. However, some items that are proposed to be removed will reduce the ability of the network to meet proper performance measurement. The FNPI and SRVs identified below are indicators and services that reflect important activities in which many agencies are engaged and should be retained.• Services (SRV):o SRV 3o - VITA, EITC, or Other Tax Preparation programs	Request Change Accepted	OCS accepts this edit and has added VITA as a countable service for SRV 3a and will include this in the supplemental manual and training upon OMB approval.
1316	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	In the proposed changes, National Performance Indicators (NPI) have been removed with the objective of reducing burden or increasing clarity. However, some items that are proposed to be removed will reduce the ability of the network to meet proper performance measurement. The FNPI and SRVs identified below are indicators and services that reflect important activities in which many agencies are engaged and should be retained.• Services (SRV):o SRV 7l - Immigration Support Services (relocation, food, clothing)	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1317	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	In the proposed changes, National Performance Indicators (NPI) have been removed with the objective of reducing burden or increasing clarity. However, some items that are proposed to be removed will reduce the ability of the network to meet proper performance measurement. The FNPI and SRVs identified below are indicators and services that reflect important activities in which many agencies are engaged and should be retained.• This option of using “z” indicators is being proposed for elimination in 3.0. We recommend retaining the “z” indicators to allow for flexibility to reflect the unique outcomes not otherwise captured by the	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an ‘other’ with requirement of description.
1318	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	D. Household Level Characteristics • ACCORD recommends retaining the household income source data point in demographics reporting to ensure the accurate representation of the economic impact of services provided by CAAs and to maintain critical insights into the economic conditions of the populations they serve.	Request Change Not Accepted	OCS has restored the income source in the instrument.
1319	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	ACCORD proposes retaining the following data indicator: o Single Parent Female and Single Parent Male. This is useful for agencies when applying for certain grants (e.g., Fatherhood Initiatives, etc.).	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1320	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	While the addition of a Transportation domain to the list of possible domains for which information will be collected is welcomed, the elevation of this service may pose a significant burden. The SRV section asks agencies to collect and provide information on unduplicated individuals served. Agencies that provide services without the collection of demographic data will be challenged. If “riders” use the service multiple times, the task of deduplication can be burdensome and, in some cases, impossible. Some of this may resolved if there were related NPIs for the services to be connected. It is not clear why the Transportation domain does not	Request Change Not Accepted	OCS acknowledges this comment and notes all service counts are no longer based solely on the number of individuals served but are flexible for different units of measurement. The column for Transportation (SRV 7) now reads Unduplicated Number Served so the unit of measurement would be the voucher, pass, card, ride, or form of assistance. OCS will release supplemental materials and guides to provide more training and explanatory language on this service domain.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1321	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	ACCORD also asks if consideration can be given to how gender is collected and, as some individuals carry more than one health insurance, adding this option would save a report error	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
1322	Lesley Gooch-Christman	Allegany County Community Opportunities and Rural Development, Inc.	ACCORD recommends that OCS collaborate with the network to provide support, training, and resources to help with the transition to the new report when it is cleared.	Alternative Response	OCS acknowleges this comment and plans incremental implementation and intends to provide expansive technical assistance and work closely with its funded technical assistance providers to provide support to grant recipients and sub grant recipients.
1323	Anna Leavitt	Community Action Partnership of Staunton, Augusta and Waynesboro	However, we do request more time to go over these proposed changes. CAPSAW sub-grants most of our funding. The timeline for developing allocation processes and reporting requirements for those sub-grantees selected to receive funding will make it very difficult to accomplish this change on the proposed timeline. Currently, Virginia state government grant funds using the state fiscal year and our reporting is collected using the state fiscal year. Our state office we would need to modify contract dates and make significant changes to our state database systems to accommodate this shift. CAPSAW will then need to base our own	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an
1324	Anna Leavitt	Community Action Partnership of Staunton, Augusta and Waynesboro	CAPSAW is also concerned with a shift from outcomes to outputs. We have worked tirelessly to develop an understanding of outcomes vs services for our subgrantee network. The ability to show how an agency can impact a client through outcomes is a powerful storytelling tool which should help them raise their own funds and lessen reliance upon our grants. Many of the new FNPIs are focused on outputs rather than outcomes. Several of the NPIs are similar to the services, rather than a result or change because of the service provided. We have concern regarding how the network will be able to continue to show the impact of the great work being	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1325	Anna Leavitt	Community Action Partnership of Staunton, Augusta and Waynesboro	The elimination and combination of a vast majority of the services and outcomes will create the need for our agency and the 20 plus subgrantee agencies to completely overhaul reporting systems. This will come with a significant cost burden as well as a significant time burden for staff. All training materials will need to be updated which includes many webinars and informational templates.	Alternative Response	OCS acknowledges this comment and emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds cooperative agreements with the National Association of State Community Service Program (NASCSP) to create custom forms with coding so each local agency has a tool to submit the data at no cost to them. Systems used at the local level for reporting are not under the purview of the
1326	Anna Leavitt	Community Action Partnership of Staunton, Augusta and Waynesboro	There are several key services and outcomes that we would like to see stay in the report, as they help tell the story of the great work being done in our region. Those key services and outcomes we would like to see remain are: SRVs = 2i, 2j, 3m, 3o, 4p 5hh, 5kk, 5mm, 5nn, 7a, 7b, 7c, 7m. FNPIs =1e, 2a, 2b, 2e, 3b, 3d, 3e, 3g, 3h, 3i, 4d, 5d.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1327	Anna Leavitt	Community Action Partnership of Staunton, Augusta and Waynesboro	If the proposed changes go through without the requested further time for preparation and input from the national network and state offices, we will need additional training and technical assistance.	Alternative Response	OCS acknowleges this comment and plans incremental implementation and intends to provide expansive technical assistance and work closely with its funded technical assistance providers to provide support to grant recipients and sub grant recipients.
1328	Daphne Hunt	California Department of Community Services and Development	FNPI Outcome DescriptionsIn articulating the goals of the CSBG Annual Report during the initial development process in 2017, in Information Memorandum 152, OCS identified the following goals, among others: “At the local eligible entity level, the information in the CSBG Annual Report will support agency efforts to set and measure progress on targets for individual, family, and community outcomes resulting from locally-determined services and strategies to address locally-identified community needs.” Recommendation: CSD encourages OCS to ensure that finalized FNPI language reflects, to the greatest extent possible, the stated	Alternative Response	OCS appreciate this feedback. Following OMB approval, OCS intends to calibrate its policies, guidance, training materials, and technical assistance. It should be noted, in a 2019 review of CSBG, the Government Accountability Office found the National Theory of Change was incongruent with the statutory goals of CSBG therefore, OCS is updating its materials to show a more clear connection between the data collected for national performance reporting and the goals of CSBG.
1329	Daphne Hunt	California Department of Community Services and Development	Consistency and Clarity of TerminologyThrough its review, CSD noted several FNPIs and services (SRVs) which used agerelated demographic terms where the age range of the individuals intended to be included in that group were unclear. The terms “young children,” "children," and "youth," as well as “seniors” and “older adults” are used in the descriptions in several FNPIs and SRVs. Recommendation: CSD recommends, if these age-related descriptors are intended to be synonymous, the use of designated terms and definitions throughout the report to describe each of these demographic groups. Whether a single descriptor for	Alternative Response	OCS acknowledges this comment and appreciates this feedback. The report was streamlined where possible to utilize universal terms for children (ages 0-5) and youth. OCS adopted industry standard inclusive language to note older adults except in instances of proper nouns for proper service attribution. In the post-OMB approval supplemental guide, OCS will provide additional explanatory guidance where feasible on age qualifiers.
1330	Daphne Hunt	California Department of Community Services and Development	Weighing Reporting Burden Reduction Against the Need to Develop Sufficient Performance Measures to Demonstrate the Value and Impact of CSBG Funding to Federal PolicymakersCSD recognizes that it can be a daunting task to develop a definitive list of potential program outcomes which balances the goal of reducing the administrative burden the Annual Report places on agencies against the foundational premise of CSBG to allow for local determination of the best methods to address the barriers to self-sufficiency facing those in poverty. Recommendation: To achieve these two equally laudable goals, where state	Alternative Response	OCS acknowledges this feedback and has updated all FNPIs to include an ‘other’ with requirement of description.
1331	Daphne Hunt	California Department of Community Services and Development	Clarifying The Purpose and Goals of The Service Outcome PlanRecommendation: To place agencies in the best position to benefit from the Service Outcome Plan, CSD encourages OCS to provide clarification on the goals and intent of the Plan. Specifically, whether this Plan is intended to be nonbinding guidance to help support agency planning and reporting or whether it is designed to capture every potential service-to-outcome connection. Further guidance on how OCS will utilize this Plan when evaluating state Annual Report submissions and performing compliance oversight of state lead agencies would also be beneficial	Alternative Response	OCS acknowledges this comment and will take it into consideration as guidance is developed.
1332	Daphne Hunt	California Department of Community Services and Development	Transition to FFY Calendar for Annual ReportingAs one of the seventeen states impacted by this proposed change, CSD appreciates the desire to align state annual reporting to a single, consistent timeframe. Recommendation: CSD strongly encourages OCS to take into consideration and make provisions for the investment of time and resources that will be required to update digital data collection platforms and reporting policies and procedures, as well as provide staff training on this new reporting timeframe. To the highest allowable degree, allowances to accommodate this burden should be made.	Alternative Response	OCS acknowledges this comment and emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds cooperative agreements with the National Association of State Community Service Program (NASCSP) to create custom forms with coding so each local agency has a tool to submit the data at no cost to them. Systems used at the local level for reporting are not under the purview of the

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1333	Daphne Hunt	California Department of Community Services and Development	Transition from DUNS to UEICSD has already implemented this change throughout the state CSBG Network and does not anticipate any additional steps that will need to be taken to affect this change	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1334	Daphne Hunt	California Department of Community Services and Development	Streamlining of State Administration Module 1CSD appreciates the consolidation or elimination of numerous data elements throughout this module. These changes have the potential to significantly reduce the administrative burden currently required to complete this portion of the Annual Report.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1335	Daphne Hunt	California Department of Community Services and Development	Module 2 Line A.1 Itemized Expenditure BreakdownCSD concurs with the support expressed for this change in Community Service Block Grant Eligible Entity (CEE) expenditure reporting in the comments submitted by California's state CSBG agency association, CalCAPA, which reflects the sentiment of CEEs in the California CSBG Network. This approach clarifies the reporting requirement and potentially reduces the administrative burden of both the state lead agency and CEEs.Recommendation: It may be advisable to add a line A.1e, which auto-calculates agency expenditure reporting on lines A.1a through A.1d. This could	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1336	Daphne Hunt	California Department of Community Services and Development	Module 2 Reporting of CSBG AllocationWith the removal of line C.2 from the Annual Report 3.0 framework, CSD requests clarification on how and where agencies will report their total annual CSBG allocation for inclusion in the auto-calculated total of total agency resources	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1337	Daphne Hunt	California Department of Community Services and Development	Change to Module Numbering SequenceIf this change is simply intended to place the two modules agencies are required to report on in consecutive order in the reporting layout, CSD encourages an assessment of CSBG Network feedback to determine if the cost outweighs the benefit of this change to the form	Alternative Response	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
1338	Daphne Hunt	California Department of Community Services and Development	Ongoing Refinement of Community-Level ReportingRecommendation: CSD urges OCS to review the feedback received from CEEs currently engaged in community-level projects as they are well positioned to evaluate the benefits and workability of the proposed changes to this module.	Alternative Response	OCS acknowledges this comment and notes that Community Level Transformation is recommended but not required due to the content of submissions in previous years, indicating the need for increased technical assistance and also keep in mind there are a vast array of state and local agencies that may not have the capacity to carry out a transformation initiative based on their funding levels. OCS believes that with enhanced training and technical assistance once we have addressed data validity in the current reporting structure, we can work collectively to build capacity

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1339	Daphne Hunt	California Department of Community Services and Development	Several FNPI and SRV descriptions use the present tense (e.g., receiving, participating, attending, etc.). Since the Annual Report captures services provided during the previous program year, consider using past tense descriptions instead (who received, who participated, etc.).	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
1340	Daphne Hunt	California Department of Community Services and Development	Ideally, the release of module-specific instruction manuals should be provided concurrent to the release of the final Annual Report 3.0 framework to guide agency planning and allow for adequate training	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1341	Daphne Hunt	California Department of Community Services and Development	To the greatest extent possible, this manual should include definitions which describe the intended meaning of programs, services, outcomes, and client descriptions used in the report	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1342	Alexis Cruz	Community Action Partnership of Lancaster and Saunders Counties, Inc.	Of the proposed changes to the Annual CSBG report we would like to commend the following changes: Client age ranges values follow Census Age Ranges. We believe this allows for a more standardized approach to understanding our data and our impact upon our service area.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1343	Alexis Cruz	Community Action Partnership of Lancaster and Saunders Counties, Inc.	Of the proposed changes to the Annual CSBG report we would like to commend the following changes: Asking education and level on all clients 5+. We believe this allows for a more standardized approach to understanding our data and our impact upon our service area, especially when considering our agency's direct impact and census reports.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1344	Alexis Cruz	Community Action Partnership of Lancaster and Saunders Counties, Inc.	Of the proposed changes to the Annual CSBG report we would like to commend the following changes: Revising Household Type options. We believe this reduces the burden upon the client and promotes a great understanding of this data field.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1345	Alexis Cruz	Community Action Partnership of Lancaster and Saunders Counties, Inc.	Of the proposed changes to the Annual CSBG report we would like to commend the following changes: Addition of the Transportation domain. We believe this is an excellent addition to the report.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1346	Alexis Cruz	Community Action Partnership of Lancaster and Saunders Counties, Inc.	Of the proposed changes to the Annual CSBG report we would like to recommend more discussion take place on the following changes and their proposed instructions: Removal Sources of Income, Other Income, and Non-Cash Benefits. We see this as potentially reducing our understanding of who we are serving. By no longer collecting the Sources of Household Income we are concerned that it would be easier for those who do not understand poverty to write a narrative on those experiencing low income by saying something like “Poor People do not want to work” and “Poor people want to stay on welfare”, thus reinforcing these	Request Change Not Accepted	OCS has restored the income source in the instrument.
1347	Alexis Cruz	Community Action Partnership of Lancaster and Saunders Counties, Inc.	Of the proposed changes to the Annual CSBG report we would like to recommend more discussion take place on the following changes and their proposed instructions: While this fear could be negated by the Work Status field, the Work Status field does not tell a complete story. The Work status field indicates that a person 18+ is potentially earning an income but it doesn’t tell whether this income provides enough to make ends meet. The Sources of Income field however, allows one to understand that while individuals in a household may be working, their work is not enough to meet ends meet and they require some type of assistance.	Request Change Not Accepted	OCS has restored the income source in the instrument.
1348	Alexis Cruz	Community Action Partnership of Lancaster and Saunders Counties, Inc.	Of the proposed changes to the Annual CSBG report we would like to recommend more discussion take place on the following changes and their proposed instructions: Service to Outcome plan integration. Our biggest concern with this change is how it affects our data. The Service to Outcome plan implies that if the participant received a service then the corresponding FNPI should be filled in and vice versa; we are thinking of participants who receive a service but do not complete the goal associated with that service.	Alternative Response	OCS acknowledges this comment and appreciates the feedback. We will take this into consideration as we develop guidance.
1349	Alexis Cruz	Community Action Partnership of Lancaster and Saunders Counties, Inc.	Of the proposed changes to the Annual CSBG report we would like to see the following rescinded as we believe their removal does more harm than good: Removal of Section E. The Number of Individuals who May or May not be included in the totals above (due to data collection system integration barriers) and section F. The Number of Households who May or May not be included in the totals above (due to data collection system integration barriers). The removal of these sections from the Individual and Family level module would be detrimental to our agency due to our agency’s data collection system integration barriers. Some of our	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1350	Alexis Cruz	Community Action Partnership of Lancaster and Saunders Counties, Inc.	Of the proposed changes to the Annual CSBG report we would like to see the following rescinded as we believe their removal does more harm than good: The removal of so many FNPIs and SRVs and the exact language of the remaining (and added) FNPIS and SRVs, leaves little interpretation up to the agency. We see this as fundamentally reducing what we report on. The CSBG report is designed to allow reporting on all agency activities, we fear that not all activities can be reported on with the exactness of the language presented in the proposed changes. Example services include: Referrals, Benefits screenings, Case Management. Referrals in	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1351	Alexis Cruz	Community Action Partnership of Lancaster and Saunders Counties, Inc.	Of the proposed changes to the Annual CSBG report we would like to see the following added as we believe the lack of proposed changes does more harm than good: Community Level module. With the provision of this module as optional, we do not see how this module can be reflective of the CSBG statute which indicates community revitalization as part of the purpose of CSBG. It is our belief that this module should be required and that the only required information needed from this module would be which Community National Performance indicator the project targets, which Community Strategy is being utilized, and which Community	Alternative Response	OCS acknowledges this comment and notes that Community Level Transformation is recommended but not required due to the content of submissions in previous years, indicating the need for increased technical assistance and also keep in mind there are a vast array of state and local agencies that may not have the capacity to carry out a transformation initiative based on their funding levels. OCS believes that with enhanced training and technical assistance once we have addressed data validity in the current reporting structure, we can work collectively to build capacity
1352	Kristin Milanich	Knoxville Knox County Community Action Committee	The projected streamlining of family national performance indicators and provided services should improve both the ease of data collection and the time burden associated with this for our agency. While it is very apparent that much thought was put into these revisions, some of the proposed changes to family national performance indicators and services are unclear and may directly impact our agency's ability to fully "tell our story" in the Annual Report	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1353	Kristin Milanich	Knoxville Knox County Community Action Committee	FNPI 4f. The number of individuals served with energy assistance or energy efficiency homes. The meaning is unclear. The service of energy assistance has traditionally not been counted as an outcome, while services impacting energy efficient homes has been collected as an outcome. How are these two things related to each other to be considered within the same outcome question?	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1354	Kristin Milanich	Knoxville Knox County Community Action Committee	FNPI 4g. The number of individuals served with improved water safety in their homes. The meaning behind "improved water safety" could use clarification. Is this a weatherization question or a home repair question?	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1355	Kristin Milanich	Knoxville Knox County Community Action Committee	FNPI 5f. The number of individuals served who then improved their mental health, behavioral health and well-being. Does this proposed indicator need to include any sort of measurement tool, as proposed FNPI 5a has? (FNPI 5a The number of individuals served who then improved their health and well-being through preventative measures.)	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1356	Kristin Milanich	Knoxville Knox County Community Action Committee	SRV 2r. The number of families participating in an evidence-based home visiting program. SRV 5i. The number of older adults receiving a home visit (e.g.: nursing, chores, personal care services). We would like to request the ability to capture home visits from all intensive case management programs, including those that may not be evidence-based, and for all individual ages. While our Head Start, families-first, and senior assistance programs can report using these two services, our many homeless programs cannot report here, including one that works with homeless youth, several that house families and single individuals, and one that	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1357	Kristin Milanich	Knoxville Knox County Community Action Committee	SRV 5h. The number of individuals receiving general wellness services (e.g.: medication management, mindfulness, exercise, fitness). SRV 5k. The number of individuals receiving substance use or misuse services (e.g.: intake, screening, counseling, support groups, and hotline.) SRV 5l. The number of individuals receiving mental health services (e.g.: intake, screening, counseling, support groups, and hotline.) SRV 5m. The number of individuals receiving domestic violence prevention and support services (e.g.: support groups, and hotline.) Please clarify: Do these include only individuals that we assist in receiving these	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1358	Kristin Milanich	Knoxville Knox County Community Action Committee	SRV 5u. The number of diapers or diapering supplies (e.g.: diapers, wipes). Please note this discrepancy in data collection request for the number of supplies provided rather than for the number of individuals served. Please revise this service collection to reflect the number of individuals receiving diapers or diapering supplies.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g.: service, indicator, domain)
1359	Kristin Milanich	Knoxville Knox County Community Action Committee	SRV 6c. The number of individuals that participated in self-sufficiency services (e.g.: Getting Ahead, Bridges Out of Poverty). Please clarify "self-suƱiciency services," as this could include all case managed clients. Are you only looking for the number of people who have attended these classes? If so, please revise verbiage to reflect "self-sufficiency trainings or workshops."	Alternative Response	OCS acknowledges this comment and upon review of this comment, the self-sufficiency indicator was removed as several of the services included address self-sufficiency and can roll up to address the CSBG goal of self-sufficiency.
1360	Kristin Milanich	Knoxville Knox County Community Action Committee	SRV 7a. Number of individuals receiving public transportation voucher or pass. Please clarify "public transportation." Can this include any agency transport available to the public or are you referencing only City public transit? We would like to capture vouchers received for all available transportation sources	Request Change Accepted	OCS appreciates the feedback. The transportation domain uses the actual transportation service as the unit of measurement. This has been revised to be more clear. For example, it's the number of gas cards, vouchers, rides, etc. vs. the number of people.
1361	Kristin Milanich	Knoxville Knox County Community Action Committee	SRV C.1a. Gender – Self-Identified Male. SRV C.1b. Gender – Self-Identified Female. Please clarify whether this must match oƱicial identification documents from the State	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1362	Kristin Milanich	Knoxville Knox County Community Action Committee	SRV C.5a. Provide the number of individuals served with a disability. Please amend to match context of SRVs C.1a. and C.1b: The number of individuals served with a self-disclosed disability.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1363	Kristin Milanich	Knoxville Knox County Community Action Committee	SRV D.9d. Single parent household. Removing the distinction of Single Parent Male vs. Singe Parent Female would be a disservice, as agencies would lose the ability to distinguish between these two very diUerent household types. Historically, there are fewer resources for Single Parent Male households than there are for Single Parent Female. Having these demographics could be useful to discovering unmet community needs.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1364	Kristin Milanich	Knoxville Knox County Community Action Committee	KKCCAC would like to also argue the complete removal of some of the services supporting multiple domains, as provision of these services has a direct impact on the members of our community and our ability to help them reach self-sufficiency:Case Management (now SRV 7a) – KKCCAC case management programs provide intensive case management services in the housing or employment domains to assist our clients. To be a case managed client means that the client presents with greater challenges to self-sufficiency, and that multiple services are needed to help them to reach stability. We feel that this is a	Alternative Response	OCS acknowledges and appreciates this feedback. There are services in the current Services Supporting Multiple Domains (such as Child Care Subsidies/Payments, Day Centers, clothing assistance) that have been restructured into other domains. OCS reviewed the last five years worth of data submissions and technical requests and several of the services presented here were either underutilized or created a burden with capturing the correct unduplicated count. Therefore, OCS has removed them from the federal reporting requirement to minimize the collective
1365	Kristin Milanich	Knoxville Knox County Community Action Committee	KKCCAC would like to also argue the complete removal of some of the services supporting multiple domains, as provision of these services has a direct impact on the members of our community and our ability to help them reach self-sufficiency:Eligibility Determination (now SRV 7b) – The removal of eligibility determination would eliminate the ability to capture the total number of people (and income levels) who need assistance within our community. Perhaps it could be included as a separate line item within each domain.	Request Change Not Accepted	OCS reviewed all of the technical assistance requests and the utilization of indicators writ large in reporting and there were significant issues with validity of the data reported for services supporting multiple domains in addition to the burden placed on local and state agencies to correctly capture this data point, OCS prioritized the burden reduction and removed this indicator from federal reporting requirements. OCS emphasizes that the removal of the federal requirement to report does not preclude states and local agencies from collecting the data and using for their own needs.
1366	Kristin Milanich	Knoxville Knox County Community Action Committee	KKCCAC would like to also argue the complete removal of some of the services supporting multiple domains, as provision of these services has a direct impact on the members of our community and our ability to help them reach self-sufficiency:Referrals (now SRV 7c) – A provider of both direct and indirect services, KKCCAC is an information and referrals agency: If we cannot directly help our low-income community members, we provide them with resources that can help them. Perhaps “Referrals” could be included as a separate line item within each domain.	Request Change Not Accepted	OCS reviewed all of the technical assistance requests and the utilization of indicators writ large in reporting and there were significant issues with validity of the data reported for services supporting multiple domains in addition to the burden placed on local and state agencies to correctly capture this data point, OCS prioritized the burden reduction and removed this indicator from federal reporting requirements. OCS emphasizes that the removal of the federal requirement to report does not preclude states and local agencies from collecting the data and using for their own needs.
1367	Kristin Milanich	Knoxville Knox County Community Action Committee	KKCCAC would like to also argue the complete removal of some of the services supporting multiple domains, as provision of these services has a direct impact on the members of our community and our ability to help them reach self-sufficiency:Birth Certificate (now 7h), Social Security Card (now 7i), and Driver’s License (SRV 7j) – These documents must be provided on application to public housing so that our clients may be placed into safe and secure housing. We would propose condensing this service to “Individuals assisted with acquiring identification documents” and adding it as a service within the Housing domain.	Request Change Not Accepted	OCS reviewed all of the technical assistance requests and the utilization of indicators writ large in reporting and there were significant issues with validity of the data reported for services supporting multiple domains in addition to the burden placed on local and state agencies to correctly capture this data point, OCS prioritized the burden reduction and removed this indicator from federal reporting requirements. OCS emphasizes that the removal of the federal requirement to report does not preclude states and local agencies from collecting the data and using for their own needs.
1368	Jennifer Palagi	ID Department of Health and Welfare	We believe the proposed changes outlined in the DCL would have the unintended consequence of impeding the Network's ability to fully share the longstanding impact this vital funding stream has had on American communities, families, and individuals.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1369	Jennifer Palagi	ID Department of Health and Welfare	Modifications to State System: The proposed changes to the CSBG Annual Report are significantly different from the current Report and will require substantial modifications to our system for data collection and processes. These modifications will require the investment of time and financial resources to modify the existing data system and require additional training and technical assistance to CSBG Eligible Entities. These changes will increase the administrative burden as we implement the changes and provide support to our subrecipients. As a small state with limited staff, the suggested changes pose a big impact.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
1370	Jennifer Palagi	ID Department of Health and Welfare	Federal Fiscal Year (FFY) Reporting Period: OCS proposed that all modules would be reported on using the Federal Fiscal Year. This does not directly impact Idaho, but we understand this could have a substantial impact on other states that do not currently utilize this reporting timeframe. Modifications to subrecipient contracts, data systems, and other forms would be required, and would result in undue burdens during the implementation phase.	Request Change Not Accepted	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
1371	Jennifer Palagi	ID Department of Health and Welfare	Change to the Services and NPIs: With the proposed changes to the services and NPIs, there will be a need to update our data system, CAP Plans, CSBG Eligible Entity refunding applications, and similar items. These changes would require time and financial resources to realign them with the 3.0 version.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language.
1372	Jennifer Palagi	ID Department of Health and Welfare	Movement from Outcomes to Outputs: NPIs play a vital role in the story of CSBG. Unlike services that communicate what was done, the NPIs communicate what results were achieved. The changes drastically modify the approach, focusing more on outputs rather than outcomes. This change "checks a box to get a number" rather than focusing on what has changed for clients and the community as a result of CSBG Network efforts. Some of the proposed NPIs are duplicative of the services with which they are aligned. Rather than being the result of the service, they are just a rewording of the service language. This is concerning as	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1373	Jennifer Palagi	ID Department of Health and Welfare	Elimination of Several NPIs and Services: OCS has indicated that elimination of NPIs and Services would decrease the burden of data collection. However, the current NPIs and Services are a menu of options from which CSBG Eligible Entities can choose, not a list that must be reported on. The true result of the proposed decrease is the elimination of possible reporting options, not an actual decrease in the data collection burden. In fact, these changes will actually increase the administrative burden due to revisions to the current data collection and reporting systems necessary to align with the proposed 3.0 version. Elimination of these	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
1374	Jennifer Palagi	ID Department of Health and Welfare	Impact on Data Analysis: The significant changes to the services and NPIs will impact the value of trend analysis. There is a lot of historical data available to the network for longitudinal trend analysis. With the proposed v. 3.0 Services and NPIs being significantly different-either because of deletion, modification, and/or merging-the ability to compare them with the historical data would be significantly impacted, effectively eliminating the Network's ability to demonstrate CSBG's long-term outcomes and successes. We believe that the proposed changes will cause data analysis will lose most of the value.	Alternative Response	OCS acknowledges this comment and appreciates the feedback. The report revisions were to ensure we addressed the expansive nature of performance measures across CSBG while meeting the requirements of the CSBG Act, the findings of the CSBG Government Accountability Office (GAO) report, and minimize the burden on the public under the Paperwork Reduction Act.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1375	Jennifer Palagi	ID Department of Health and Welfare	Unduplicated Count Requirement: Not changing the unduplicated number of individuals served requirement is a concern. This requirement is very difficult to meet considering the data being collected from the various programs being administered. The work involved to obtain an unduplicated count ultimately results in an increased administrative burden when completing the CSBG Annual Report. The real result of the unduplicated requirement is that these services and outcomes are ultimately underreported which affects the data being reported to decision makers about this program. We would like to see that this requirement	Request Change Not Accepted	OCS is ensuring we are responding to the findings from the Government Accountability Office (GAO) utilizing the total number served to capture totals for national performance reporting. OCS has revised the SRVs to be more flexible, which may in part address the concern. OCS may want to point out that unduplicated counts of individuals were rquired in Annual Report 2.1, so this does not represent a change.
1376	Jennifer Palagi	ID Department of Health and Welfare	In addition to our concerns outlined above, we request that when the CSBG Annual Report v. 3.0 is implemented, adequate guidance and support be provided to the CSBG Lead Agencies and the CSBG Eligible Entities at the beginning of the process. This should be in the form of clear instruction and definitions of what is being collected to ensure that the Report is being implemented consistently across the CSBG Network, that adequate training and technical assistance to help with the understanding and implementation of revised report is provided, and that adequate financial support to modify the existing systems is made available.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1377	Delia Anderson	Economic Opportunity Agency of Washington County, Inc.	Breakdown of CSBG Funding to include the CSBG Allocation, as well as Carryover and Discretionary funds. (Module 2, A.1.)	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1378	Delia Anderson	Economic Opportunity Agency of Washington County, Inc.	Expanded breakdown of Transportation Services. (SRV 7b.)	No Change or Response Needed	No response required.
1379	Delia Anderson	Economic Opportunity Agency of Washington County, Inc.	Vague and confusing language and terms in the NPIs (Module 4, Section B) -"Counts of change," "Rates of change," and "assets/resources." These terms can be interpreted in different ways, and it is unclear exactly what is expected when these terms are used in the categories of Employment, Education, Infrastructure and Asset Building, and Health. Adding "Other Counts of Change" and "Other Rates of Change" for every NPI could compound the confusion and yield unwieldy results	Alternative Response	OCS acknowledges this comment and notes that Community Level Transformation is recommended but not required due to the content of submissions in previous years, indicating the need for increased technical assistance and also keep in mind there are a vast array of state and local agencies that may not have the capacity to carry out a transformation initiative based on their funding levels. OCS believes that with enhanced training and technical assistance once we have addressed data validity in the current reporting structure, we can work collectively to build capacity
1380	Delia Anderson	Economic Opportunity Agency of Washington County, Inc.	2. Major changes in the NPIs and Order of Services will require our data collection system to be completely modified. 3. Data Collection System changes could be costly.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1381	Delia Anderson	Economic Opportunity Agency of Washington County, Inc.	Utility payment assistance is listed under "Eviction Prevention Services." (SRV 4d) This seems misplaced. A separate Utility Assistance category would be more appropriate, as it is in the existing report.	Request Change Accepted	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1382	Delia Anderson	Economic Opportunity Agency of Washington County, Inc.	The list of staff credentials has been removed (Certified Community Action Professionals, ROMA Trainers and Implementers, Family Development Credentials, CDAs, etc.) CSBG funds are used to pay for some of these professional development and training opportunities and should be captured in the report.	Request Change Not Accepted	OCS acknowledges this comment. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency (subrecipient), state, tribe, or territory (grant recipient) from collecting the information for their specific needs.
1383	Claudia Guzman	Central Valley Opportunity Center, Incorporated	Employment FNPIs: The removal and revising of these FNPIs will decrease the number of outcomes CVOC reports, and the revision of FNPI1h, now FNPI1c, does not capture the same achievements of employment retention that the current FNPIs capture. It would be beneficial to include an FNPI which measures long-term employment outcomes	Request Change Not Accepted	OCS acknowledges this comment. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency (subrecipient), state, tribe, or territory (grant recipient) from collecting the information for their specific needs.
1384	Claudia Guzman	Central Valley Opportunity Center, Incorporated	Education FNPIs: The removal of FNPI 2c and FNPI 2d would impact our agency's ability to report the collaborative work that CVOC, Merced Office of Education, and Migrant Education Region 3 do to increase migrant and seasonal farmworker youth access to education and career resources through our joint Summer School Program.	Request Change Not Accepted	OCS acknowledges this comment. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency (subrecipient), state, tribe, or territory (grant recipient) from collecting the information for their specific needs.
1385	Claudia Guzman	Central Valley Opportunity Center, Incorporated	Housing FNPIs: There should be a separation between energy assistance and energy efficiency homes in FNPI4f. These are two different outcomes that require two different services.	Request Change Accepted	OCS acknowledges and has incorporated this feedback.
1386	Claudia Guzman	Central Valley Opportunity Center, Incorporated	Health FNPIs: The removal of FNPI5z.1 would limit our ability to report the outcomes of individuals we assist with food assistance.	Request Change Not Accepted	OCS acknowledges this comment. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency (subrecipient), state, tribe, or territory (grant recipient) from collecting the information for their specific needs.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1387	Claudia Guzman	Central Valley Opportunity Center, Incorporated	The removal of SRV 7a Case Management drastically limits the reportable services that we provide our program participants. CVOC provides all career and training clients with intensive case management. Case management participant assessment, coordination of services, referrals, and counseling. Case Management is an essential part of the work we do.	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
1388	Action for a Better Community, Inc.	Action for a Better Community, Inc.	Some form of data collection and reporting are essential to the Community Services Block Grant. To demonstrate the unique power of this federal funding, CAAs will need to demonstrate that their programs have impact. The proposed changes remove some important outcomes, especially related to employment and education. Eliminating these from the Annual Report severely limits our ability to show our impact and prove that CSBG is essential to fighting poverty. During the life of the American Recovery and Reinvestment Act (ARRA), CSBG was one of the leading job-creators and employment programs run by the federal government.	Request Change Not Accepted	OCS acknowledges this comment. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency (subrecipient), state, tribe, or territory (grant recipient) from collecting the information for their specific needs.
1389	Action for a Better Community, Inc.	Action for a Better Community, Inc.	Many of the new FNPIs are not outcomes at all, but are instead services. Here are a few examples:FNPI 2a. The number of young children (0-5) enrolled in childcare or early childhood education services	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1390	Action for a Better Community, Inc.	Action for a Better Community, Inc.	Many of the new FNPIs are not outcomes at all, but are instead services. Here are a few examples:FNPI 3a. The number of individuals completing income and asset building training.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1391	Action for a Better Community, Inc.	Action for a Better Community, Inc.	Many of the new FNPIs are not outcomes at all, but are instead services. Here are a few examples:FNPI 5b. The number of individuals with access to health coverage	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1392	Action for a Better Community, Inc.	Action for a Better Community, Inc.	Many of the new FNPIs are not outcomes at all, but are instead services. Here are a few examples:FNPI 5i. The number of individuals receiving access to healthy food options	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1393	Action for a Better Community, Inc.	Action for a Better Community, Inc.	The removal of all services related to Case Management: This service demonstrates that CAAs work with the whole person/family as opposed to simply providing isolated services. Bundled services, the Whole Family Approach, 2Gen – all of these approaches to providing self-sufficiency service rely on some form of case management. Removing these services from the report risks omitting a significant part of the Community Action approach – leveraging resources and connecting customers to them,	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
1394	Action for a Better Community, Inc.	Action for a Better Community, Inc.	Removal of Sources of Income, Other Income, and Non-Cash Benefits: Sources of Income needed to be simplified, but completely removing them eliminates important information, especially the reporting of benefits such as SNAP, WIC and TANF. ABC is currently leading a community coalition helping families with low-incomes avoid the benefits cliff. CAAs should be encouraged to continue collecting data regarding sources of income to better illustrate how the network leverages existing public benefits to advance economic self-sufficiency. Not reporting full data regarding income diminishes the quality of the CSBG story by not fully	Request Change Not Accepted	OCS has restored the income source in the instrument.
1395	Action for a Better Community, Inc.	Action for a Better Community, Inc.	Community level impact by CAAs is poorly measured by the proposed reporting instrument: The current Module regarding community-level change hypothesizes that CAA community-level work happens in a very circumscribed way and that it has a finite timespan: a plan is developed, it goes through an implementation phase and it then reaches a maturity phase. This is characteristic of some community-level work, but seriously underreports the vast array of community level work CAAs engage in. Because the Annual Report so poorly captures community level work, it grossly misrepresents the impact of the CSBG program –	Alternative Response	OCS appreciates this feedback. This is a broader challenge of capturing diverse services offered at nearly 1,000 agencies. There are other opportunities in the reporting schema to provide qualitative data such as the other fields in the services and NPIs.
1396	Action for a Better Community, Inc.	Action for a Better Community, Inc.	The proposed report suggests CSBG is primarily used for discrete services that follow a one-outcome-per-service model. This is further reinforced by the effort to “map” services into outcomes. While it is obvious that services should lead to outcomes, the report falsely communicates CSBG functioning as a funder of siloed services. It is much more the case that multiple services, in concert, produce a bundle of outcomes. The proposed report’s dependence on this data model provides a low quality description of CSBG’s function and impact. OCS should deeply collaborate with local CAAs to jointly develop measures that demonstrate	Alternative Response	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job
1397	Action for a Better Community, Inc.	Action for a Better Community, Inc.	Some of the wording is not complete or does not make sense. Here are a few examples:FNPI 5h. The number of children preventative oral health services.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language.
1398	Action for a Better Community, Inc.	Action for a Better Community, Inc.	Some of the wording is not complete or does not make sense. Here are a few examples:SRV 2e. The number of individuals that receiving K-12 Support Services (e.g.: English, literacy, etc.)	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1399	Action for a Better Community, Inc.	Action for a Better Community, Inc.	Some of the wording is not complete or does not make sense. Here are a few examples:SRV 5u. The number of diapers/diapering supplies (e.g.: diapers, wipes).	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language.
1400	Action for a Better Community, Inc.	Action for a Better Community, Inc.	The collection of data will always produce a burden. The proposed changes will slightly reduce that burden but is not worth the loss of data previously referenced.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1401	Action for a Better Community, Inc.	Action for a Better Community, Inc.	OCS does not appear to understand that the resource burden of the CSBG Annual Report is significantly driven by reporting infrastructure: staff time, database maintenance and training, etc. Eliminating some outcome/service indicators has minimal impact on the reporting burden. OCS is seriously misstating this in their proposed estimate of reporting burden.	Alternative Response	OCS utilized the burden estimate formula developed for the current annual report and adjusted it based on the reductions and kept in mind there would be initial increases in burden to account for the changes during the periods where there is an overlap of 2.1 and 3.0 reports in FY26 (3.0 is optional in FY26 before becoming mandatory in FY27) but that it would adjust over time. It should be noted that burden estimates are largely estimates and the federal office through an incremental implementation intends to provide expansive technical assistance and
1402	Action for a Better Community, Inc.	Action for a Better Community, Inc.	Additions, revisions, modifications to Information collection should be identified through a collaborative process that includes those most knowledgeable – the 1,000+ local Community Action Agencies that collect, analyze and act on the data that are reported. No significant collaboration occurred prior to the proposed changes, resulting in changes to the report that fail to demonstrate the full impact of CSBG.	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an
1403	Action for a Better Community, Inc.	Action for a Better Community, Inc.	Include an outcome related to obtaining employment. It is important for CAAs to show the impact of employment programs. Leaving out 'obtain employment' means that we will not report on one of community action's most important outcome. Limit this outcome to obtaining employment without reference to a living wage. There is little burden to collect and record data on obtaining employment, but the term 'living wage' is not consistent and would be a larger burden.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1404	Action for a Better Community, Inc.	Action for a Better Community, Inc.	Change FNPI 2d because the related services do not match the outcome and the outcome is unrealistic (The number of individuals who obtained a recognized credential, certificate, or degree relating to the achievement of educational or vocational skills). Adults at these educational levels are unlikely to obtain that level of credential. Adult Basic Education is defined as grade level 0.0 to 8.9. A more appropriate outcome is "increase basic education skills".	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1405	Action for a Better Community, Inc.	Action for a Better Community, Inc.	SRV 2n. The number of individuals attending basic education classes (e.g.: financial literacy).Adult Basic Education (ABE) is defined as “basic skills instruction below the high school level” and includes reading, writing, math, English language proficiency, and problem-solving to be productive workers, family members, and citizens. (https://aefla.ed.gov/) Remove “Financial Literacy” as an example. It is included in SRV 3a (The number of individuals that received training and counseling services for income management and asset building (e.g.: credit repair, financial literacy, financial management, budgeting, homebuying, foreclosure	Request Change Accepted	OCS appreciates this feedback.
1406	Action for a Better Community, Inc.	Action for a Better Community, Inc.	SRV 2l is redundant and should be removed (The number of individuals attending adult literacy classes). It is part of ABE.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1407	Action for a Better Community, Inc.	Action for a Better Community, Inc.	SRV 2m is unclear (The number of adults attending English Language classes). Is this meant to track English Language Acquisition (ELA) classes for speakers of other languages?	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1408	Annie Norrod	EnAct, Inc.	I would like to propose that you consider clearing the CSBG Annual report Version 2.1 as we continue to work on Version 3.0 with Community Action (CAA) Input before putting Version 3.0 into effect.	Alternative Response	On June 28, OCS released a Dear Colleague Letter announcing the processing for the final 30 days on Annual Report 2.1, the Tribal Annual Report, and Tribal Short Form while we continue to reconcile the comments submitted on Annual Report 3.0. Once all comments have been reconciled, ACF will prepare Annual Report 3.0 for final comment and OMB approval.
1409	Annie Norrod	EnAct, Inc.	Several proposed changes in the current draft 3.0 Version make sense as they bring cohesiveness to the data collection process, and we appreciate that you are attempting to make the reporting more user friendly. However, it is imperative that we paint the whole picture of what is improving peoples’ lives, as it provides the basis for what is ultimately presented to Congress and supports telling the CSBG story at the national, state, and local levels. We all agree that if more essential and detailed information is gathered and presented at the agency level, the result is the opportunity for better management decisions, grant oversight	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1410	Annie Norrod	EnAct, Inc.	We also know that the primary objective for CSBG work is getting people out of poverty and into self- sustainability. Notwithstanding, the proposed employment performance indicators do not fully reflect what CAA’s accomplish in their efforts to improve people’s lives and to transition individuals and families to independence andsustainability.	Alternative Response	OCS acknowledges this comment and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1411	Annie Norrod	EnAct, Inc.	Additionally, some of the changes proposed by the Office of Community Services do not actually decrease the burden to CAAs as represented; instead, they would likely result in an inappropriate shift of burdens and responsibilities, without the provision of any additional resources, from the federal to the state and local levels.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
1412	Annie Norrod	EnAct, Inc.	The data burden of unduplicated demographics is a direct result of the quality and capacity of a CAA's agency-level database. The data burden for unduplicated counts and the time period is the grant-driven nature of our work. In other words, until the federal government and participating states create secure and confidential data bridges between the various data collections systems, the associated burden, redundancies, and inefficiencies of data collection and sharing will remain. Neither Version 2.1 or proposed Version 3.0 address this issue in a manner that will resolve this fundamental issue, but we can find a viable and cost-	Request Change Not Accepted	OCS is ensuring we are responding to the findings from the Government Accountability Office (GAO) utilizing the total number served to capture totals for national performance reporting.
1413	Annie Norrod	EnAct, Inc.	We encourage you to carefully consider the impact, including any unintended consequences, the proposed Version 3.0 changes will have on the CAA network and EnAct. This Annual Report delineates the essence of Community Action's purpose to Congress, which impacts CAA funding, resources, and our ability to carry out our essential purpose throughout the country. If this purpose is diminished by the down-scaling and generalization of information collected by CAAs, along with the continued inability to bridge the various databases, it could be detrimental to the longevity of CAAs and the valuable programs provided by	Alternative Response	OCS acknowledges this comment and appreciates the feedback. The report revisions were to ensure we addressed the expansive nature of performance measures across CSBG while meeting the requirements of the CSBG Act, the findings of the CSBG Government Accountability Office (GAO) report, and minimize the burden on the public under the Paperwork Reduction Act. The connection between service to outcome also enhances how we tell the national story of CSBG.
1414	Tasha Skouby	Jefferson-Franklin Community Action Corporation (JFCAC)	I am writing to address the proposed changes to the Community Services Block Grant (CSBG) annual reporting requirements. As a stakeholder committed to the well-being and development of our community, I have significant concerns about how these changes will impact our ability to effectively capture and communicate the diverse experiences of the clients we serve.One of the CSBG annual report's main functions is to provide an overview of the varying experiences of clients who benefit from our programs. These reports are instrumental in identifying trends, challenges, and successes within our community. The proposed changes,	Alternative Response	OCS acknowledges this comment and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS
1415	Tasha Skouby	Jefferson-Franklin Community Action Corporation (JFCAC)	Accurately reporting the status changes of clients is crucial for several reasons:Needs Assessment: Detailed status changes help us detect evolving needs within the community. By understanding how clients' situations improve or worsen over time, we can tailor our services to address emerging issues more effectively.Program Effectiveness: Tracking status changes allows us to evaluate the impact of our programs. Without this data, it becomes challenging to measure outcomes and make informed decisions about where to allocate resources.Funding Justification: Many funding bodies require detailed evidence of	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1416	Tasha Skouby	Jefferson-Franklin Community Action Corporation (JFCAC)	The proposed changes could lead to a homogenization of data, obscuring the unique and varied experiences of our clients. This would not only hinder our ability to understand and address specific needs but also weaken our case when advocating for the community at larger forums.	Alternative Response	OCS acknowledges this comment and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1417	Tasha Skouby	Jefferson-Franklin Community Action Corporation (JFCAC)	Therefore, I urge reconsideration of the proposed reporting changes. It is vital that the reporting framework remains detailed and flexible enough to capture the full spectrum of client experiences and status changes. Only with this comprehensive data can we continue to improve our programs and effectively support the individuals and families who rely on our services.	Alternative Response	OCS acknowledges this comment and the understands that this is one of the greater challenges in measuring anti-poverty strategies. In some instances there is not always a consistent opportunity to track movement of one individual. OCS contends with this issue along with ensuring the burden isn't exacerbated, the information tells the larger story around performance measures, and considers utilization. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS
1418	Louisiana Workforce Commission	Louisiana Workforce Commission	F.1 – revised, becomes D.1 – Question re “Evaluation Measures for TTA” column. Is this asking for things like survey results/org standards scores on standards related to the training topics, trends in monitoring, etc?	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1419	Louisiana Workforce Commission	Louisiana Workforce Commission	A.1 – Expenditures – the breakdown and explanation is very helpful and will increase accuracy	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1420	Louisiana Workforce Commission	Louisiana Workforce Commission	C.2 – Yes, support removing this – it has been a source of confusion	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1421	Louisiana Workforce Commission	Louisiana Workforce Commission	FNPI 1a and FNPI 1b – What is the recommended way to measure whether these outcomes are achieved Is the fact that the individual received employment services enough to meet this outcome or should there be some type of pre and post assessment to show that the person “increased skills to maintain employment?”	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1422	Louisiana Workforce Commission	Louisiana Workforce Commission	FNPI 2a – what makes this an outcome instead of a service?	Alternative Response	OCS acknowledges this comment and has added language to improve the structure of FNPIs.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1423	Louisiana Workforce Commission	Louisiana Workforce Commission	FNPI 2b – How do we define “actively connected?”	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1424	Louisiana Workforce Commission	Louisiana Workforce Commission	FNPI 3a – what is the recommended measurement tool for this? Completion/certification of passing the course?	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1425	Louisiana Workforce Commission	Louisiana Workforce Commission	FNPI 5a - What is the recommended way to measure whether this outcome is achieved?	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1426	Louisiana Workforce Commission	Louisiana Workforce Commission	FNPI 5f - What is the recommended way to measure whether this outcome is achieved?	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1427	Louisiana Workforce Commission	Louisiana Workforce Commission	FNPI 7a – CSBG services have a unique ability to have positive impacts on multiple domains of a person’s life even if services are provided in only one domain. Without the 7a indicator, we may lose this part of the story.	Request Change Not Accepted	OCS reviewed all of the technical assistance requests and the utilization of indicators writ large in reporting and there were significant issues with validity of the data reported for services supporting multiple domains in addition to the burden placed on local and state agencies to correctly capture this data point, OCS prioritized the burden reduction and removed this indicator from federal reporting requirements. OCS emphasizes that the removal of the federal requirement to report does not preclude states and local agencies from collecting the data and using for their own needs.
1428	Louisiana Workforce Commission	Louisiana Workforce Commission	Not having the flexibility to create own indicators (“z indicators”) may limit agencies’ ability to report on unique things they provide, such as hurricane preparedness kits, etc.	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an ‘other’ with requirement of description.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1429	Louisiana Workforce Commission	Louisiana Workforce Commission	SRV 7a – If this is removed, where will agencies report data on case management services provided? Wrap around case management services are often the services that really helps to move the needle in terms of outcomes for families; doing away with this SRV code will impact our ability to show this impact.	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
1430	Louisiana Workforce Commission	Louisiana Workforce Commission	C 1a – C1c – Can this be expanded to include non-binary options?	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g.: service, indicator, domain)
1431	Louisiana Workforce Commission	Louisiana Workforce Commission	C2a – C3i – appreciate greater consistency between age ranges across questions	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1432	Louisiana Workforce Commission	Louisiana Workforce Commission	D.9c – D9d – not distinguishing between single parent female and single parent male households may limit an agency's ability to show data around equity issues and thus limit ability to secure funding to address these issues	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1433	Louisiana Workforce Commission	Louisiana Workforce Commission	Removing datasets that cannot be unduplicated may result in underreporting of data in our state, especially in times of emergencies/disasters (weather related or otherwise) where oftentimes services must be provided quickly and without the ability to gather the data necessary to deduplicate individuals. Since Louisiana is disproportionately impacted by weather related disasters, this change could in turn have a disproportionate impact on us. `	Request Change Not Accepted	OCS is ensuring we are responding to the findings from the Government Accountability Office (GAO) utilizing the total number served to capture totals for national performance reporting. OCS has revised the SRVs to be more flexible. OCS may want to point out that unduplicated counts of individuals were rquired in Annual Report 2.1, so this does not represent a change.
1434	Louisiana Workforce Commission	Louisiana Workforce Commission	Removing the household income sources data point could be problematic for us. We know that many of the individuals in our state who are eligible for public benefits don't actually receive them, and we can only address this problem if we have the data to support that it's an issue. `	Request Change Not Accepted	OCS has restored the income source in the instrument.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1435	Louisiana Workforce Commission	Louisiana Workforce Commission	Service to Outcome Plan: This is helpful to see which services map to which outcomes, but I am confused about the statement “corresponding indicator for the service counts to cascade into for routine target setting to measure performance.” Does this mean, for example, that SRV 2l – 2n are totaled up to get the number for FNPI 2d? Or will 2d numbers only reflect the individuals who actually obtained the degree?	Alternative Response	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job
1436	Louisiana Workforce Commission	Louisiana Workforce Commission	Some of the things listed as outcomes in the proposed changes seem to be services as defined by ROMA principles. This has the potential to cause confusion at the state level and the local level as we have ROMA trainers and implementers at all levels who have been trained to recognize the difference between services and outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1437	Louisiana Workforce Commission	Louisiana Workforce Commission	Our mandated system, ELogic Genesis, is currently configured to capture the data required by the CSBG Annual Report as it exists today. Reconfiguring the system will result in additional cost to the state office, utilizing discretionary funding that has been allocated to innovative projects at the state and local level. It will also result in additional time and effort on the part of program staff.	Alternative Response	OCS acknowledges this comment and emphasizes that the federal office requires and funds the use of the Grant Solutions Online Data Collection (OLDC) tool used to collect the data in the annual report by grant recipients (states, tribes, and territories). The federal office funds cooperative agreements with the National Association of State Community Service Program (NASCSP) to create custom forms with coding so each local agency has a tool to submit the data at no cost to them. Systems used at the local level for reporting are not under the purview of the
1438	Louisiana Workforce Commission	Louisiana Workforce Commission	In Louisiana, the CSBG state office is situated within the Workforce Commission, which means state leaders are very interested in data that show CSBG services can and do lead to individuals who are not in the labor force joining the labor force. The proposed new outcome statements on employment seem more like service counts and do not align to the current state reporting requirements (Louisiana Performance Accountability System/LaPAS).	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1439	Louisiana Workforce Commission	Louisiana Workforce Commission	In states where the political climate may not be supportive of resources and services going to low income communities, having strong outcome data is especially important to ensuring that public officials can speak to the importance of and need for CSBG in their communities.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language.
1440	Rand Clark	Douglas County	We are concerned with the removal of service and outcome measures connected to case management. We believe case management to be a critical component of the effort provided to assist households in overcoming poverty. Its exclusion as a reported service diminishes our ability to tell the full breadth of work needed to accomplish this outcome.	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1441	Rand Clark	Douglas County	We would also like to provide feedback on the alignment of service deliveries with performance outcome indicators. While we acknowledge the importance of tracking outcomes to assess program effectiveness, we believe the revised approach may not fully align with the Results Oriented Management and Accountability (ROMA) process. ROMA practice shows that services and outcomes are not always directly linked; some outcomes require multiple services, while certain services may not consistently yield the same outcomes. We are concerned that the proposed change prioritizes service provision over results.	Alternative Response	OCS acknowledges this comment and emphasizes multiple services often contribute to one outcome and the aim is to identify the service that typically has the principal effect on a single outcome. An approach to doing this is conceptualizing what a service (or 'intervention') was ultimately designed to primarily target. To illustrate this, employment services are primarily designed to improve chances of obtaining employment. However, providing child care assistance can also, in a way, help with employment because it gives parent more time and space for job
1442	Rand Clark	Douglas County	Additionally, it is our concern that the proposed changes may result in an increased administrative burden for our county. Adjustments to our reports and data systems will be required to accommodate the new requirements. While we understand that the reduction and repurposing of seldom-used services and outcomes is necessary to simplify the report, in practicality, these changes do little to reduce our administrative burden and will require significant staff time to adjust reporting parameters.	Alternative Response	OCS utilized the burden estimate formula developed for the current annual report and adjusted it based on the reductions and kept in mind there would be initial increases in burden to account for the changes during the periods where there is an overlap of 2.1 and 3.0 reports in FY26 (3.0 is optional in FY26 before becoming mandatory in FY27) but that it would adjust over time. It should be noted that burden estimates are largely estimates and the federal office through an incremental implementation intends to provide expansive technical assistance and
1443	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	The Kentucky State Office will not be changing the contract year from State to Federal Fiscal year. Furthermore, Kentucky is a reimbursement state, and the invoices would still be on the state fiscal year. Consequently, this will not reflect correctly with the eligible entities totals for Module 2. Since the contracts in Kentucky will be on a state fiscal year the monitoring for the agencies will reflect this.	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
1444	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Kentucky does not use or have discretionary funding for T & TA we allocate 95 percent of the funding to our entities and have a contract with our State Association to perform T & TA with the State office.Kentucky would like to propose continue use the CSBG Annual Report 2.1. If not, there will need to be funding to help states offset the expense of updating software systems and T/TA. The cost associated with updating the software systems could be significantly high and present a major burden on our agencies.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
1445	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Kentucky believes this change will dismantle the quality and clarity of ROMA and/or PEAAK.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1446	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	The proposed numbering format of the Modules will lead to confusion for CSBG eligible entities. Kentucky proposes it would be more beneficial to maintain the existing Module numbering system (Module 4a FNPIs, Module 4b Services, Module 4c All Characteristics Report, Module 3 Community).	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1447	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	The extreme impact on the State, the State Association, and the eligible entities if we are not able to see the outcomes that clients have reached by using their annual reports. It will be more burdensome to have to reach out to each agency to request additional information to make snapshots for legislative visits, etc. (e.g., how many people did you help find employment). This will be a burden for the state association, state office, and each agency as this will require additional time.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1448	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Changing the wording of most of the outcomes to service language (received, enrolled, connected) diminishes the achievements of the outcomes. I have a concern that the quality and effectiveness of the FNPIs and Services may be diminishing. An agency will encounter difficulties in accurately demonstrating the progress they have made in assisting individuals towards economic security.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1449	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Kentucky proposes leaving the following in the All-Characteristics Report: Single Parent Female and Single Parent Male. This is a program that is greatly supported by the state office and there are programs that would be impacted applying for certain grants (e.g., Fatherhood Initiatives, etc.). This could cause an extreme burden for agencies applying for grants. Also, in the All-Characteristics Report: Income Sources allows agencies to know who they are serving and helps to breakdown myths of who is served. Which is reported to our legislators.	Alternative Response	OCS acknowledges this comment and combined to reduce the burden of having to extrapolate this at the local level. Not all local agencies have the ability to split this therefore OCS suggests retaining if necessary for local efforts, but will consolidate for national reporting.
1450	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	It has been brought to our attention that the new OCS Dashboard (website) that will roll out in the future. It may not reflect correct information, if we are only lumping services together and not showing outcomes, how will the information be available to the public, legislators, other funding sources? We believe this could weaken the exceptional work that a CSBG eligible entity do for their communities.	Alternative Response	OCS acknowledges this comment and all related performance management tools including websites, dashboards, and technical assistance materials will be calibrated to reflect what is reported in future years.
1451	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Employment: The number of unemployed adults who obtained employment has been removed as a FNPI. This is a very important indicator for CSBG eligible entities, and it is part of the CSBG Act. As referenced above, obtain employment should be included therefore, more services to explain how employment was obtained should be added (e.g., Job Readiness Training, Resume Development, Interview Skills Training, etc.).	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1452	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Income and Asset Building Services: SRV 3d – The number of individuals receiving transportation services supporting income and asset building (e.g.: bus voucher or pass to trainings, etc.). Should this be moved to Domain 7 Transportation?	Request Change Accepted	OCS has updated this to correctly place transportation services in SRV 7.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1453	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Income and Asset Building Services: There are no services to match the new NPI 3b – The number of individuals who opened a savings account (Suggest adding a SRV – Individuals who opened a savings accounts/IDAs and other asset building accounts) or IDA or NPI 3c – The number of individuals who purchased a home (Suggest adding a SRV – Individuals that received Homebuyer Counseling and other homebuying support services). You may assume that these services are covered under the new SRV 3b but again, an agency will encounter difficulties in accurately demonstrating the progress they have made in assisting individuals	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
1454	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Housing: SRV 4g – The number of households receiving weatherization services. This does not necessarily align with the FNPI 4f – The number of individuals served with energy assistance and/or energy efficiency homes. Served with energy assistance is including a service such as LIHEAP.	Request Change Accepted	OCS acknowledges this comment and appreciates this feedback. The FNPI that corresponds to weatherization has been updated to align with improved health and safety due to home improvements.
1455	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Housing: Is the assumption that FNPI 4 - The number of individuals served with improved water safety in their homes - would be reached it someone had water safety which is included in SRV 4f – The number of individuals receiving housing maintenance and improvement services (e.g., structural, accessibility improvements, emergency home repairs, water safety, healthy home)?	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1456	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Civic Engagement and Community Involvement: Why was Leadership Training removed from the services?	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1457	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Transportation Domain: SRV 3d – The number of individuals receiving transportation services supporting income and asset building (e.g.: bus voucher or pass to trainings, etc.). Should this move to Domain 7 Transportation?	Request Change Accepted	OCS has updated this to correctly place transportation services in SRV 7.
1458	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Multiple Domains: Why was Case Management removed?	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1459	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Multiple Domains: Why were referrals removed?	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
1460	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Multiple Domains: Why were eligibility determinations removed?	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
1461	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Employment: The number of unemployed adults who obtained employment has been removed. This is part of the CSBG Act and is a very important indicator for CSBG eligible entities.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1462	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Education: 2a – The number of young children (0-5) enrolled in childcare or early childhood education services. Enrolling in a service is an output not an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1463	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Education: 2b – The number of youths actively connected to education and skills development program. Actively connected is a service, not the outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1464	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Education: 2e – The number of individuals who enrolled in post-secondary degree program (e.g., associates, bachelors, etc.) Enrolling does not mean achieving; this is a service.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1465	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Income and Asset Building: There are no services to match the new NPI 3b – The number of individuals who opened a savings account or IDA or NPI 3c – The number of individuals who purchased a home.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
1466	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Housing: Many of the outcomes are outputs (services), not outcomes, however they are output services. - FNPI 4f – why was 'served with energy assistance' added? Is this still a Weatherization outcome or do you now count LIHEAP assistance here? - FNPI 4g – individuals served with improved water safety in their homes – is the LIHWAP?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1467	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Health: Many of the outcomes in Domain 5 are outputs (services), not outcomes they are output services. FNPI 5b – The number of individuals with access to health coverage. FNPI 5c – The number of individuals receiving reproductive services. FNPI 5d – The number of individuals receiving wellness services. FNPI 5e – The number of older adults (age 65+) receiving home visiting services. FNPI 5g – The number of adults receiving preventative oral health services. FNPI 5h – The number of children receiving preventative oral health services.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1468	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Health: 5f should not be removed (The number of seniors (65+) who maintained an independent living situation)? Supporting senior independent living is a large part of what our entities serve, this is an important FNPI.	Request Change Accepted	OCS acknowledges this comment and has restored the independent living siutation indicator for seniors.
1469	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Household Level Characteristics: Single Parent Female and Single Parent Male. This is beneficial to agencies when applying for certain grants (e.g., Fatherhood Initiatives, etc.).	Alternative Response	OCS acknowledges this comment and combined to reduce the burden of having to extrapolate this at the local level. Not all local agencies have the ability to split this therefore OCS suggests retaining if necessary for local efforts, but will consolidate for national reporting.
1470	Kentucky Department of Community Based Services	Kentucky Department of Community Based Services	Household Level Characteristics: Income Sources allows agencies to know who they are serving.	Request Change Accepted	OCS acknowledges this comment and restored the income sources.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1471	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	We believe that we should continue using the CSBG Annual Report 2.1. If not, there will needto be funding to help states offset the expense of updating software systems. There should also be more funding for local CSBG eligible entities.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
1472	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	The Kentucky State Office has stated they will not change to the Federal Fiscal Year. With thisbeing said, that will never allow for our money to be correct on Module 2.	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
1473	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	The proposed numbering format of the Modules will lead to confusion for CSBG eligible entities. I believe it would be more beneficial to maintain the existing Module numbering system (Module 4a FNPIs, Module 4b Services, Module 4c All Characteristics Report, Module 3 Community).	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
1474	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	There will be a huge impact on the State and the State Association if we are not able to see the outcomes that clients have reached by using their annual reports. It will be more burdensome to have to reach out to each agency to request additional information to make snapshots for legislative visits, etc. (e.g., how many people did you help find employment). This will be a burden for the state association, state office, and each agency as this will require additional time.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1475	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Changing the wording of most of the outcomes to service language (received, enrolled,connected) diminishes the achievements of the outcomes. I have a concern that the quality andeffectiveness of the FNPIs and Services may be diminishing. An agency will encounter difficulties inaccurately demonstrating the progress they have made in assisting individuals towards economic security.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1476	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	We believe that we should leave the following in the All Characteristics Report: Single ParentFemale and Single Parent Male. This is useful for many agencies when applying for certain grants (e.g., Fatherhood Initiatives, etc.).	Request Change Accepted	OCS acknowledges this comment and initially removed this due to burden to split out the type of household. It has been restored noting the agencies reporting collect it separately for specific initiatives.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1477	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	We believe that by leaving Income Sources in the All Characteristics Report allows our agencyto know who we are serving and helps to breakdown myths of who is served.	Request Change Accepted	OCS acknowledges this comment and has restored Module 4 Section parts 13 and 14 for household income sources.
1478	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Employment: The number of unemployed adults who obtained employment has been removed as a FNPI. This is one of the main indicators for CSBG eligible entities, and it is part of the CSBG Act Obtaining employment should be included therefore, more services to explain how employment was obtained should be added (e.g., Job Readiness Training, Resume Development, Interview SkillsTraining, etc.).	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1479	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Income and Asset Building Services: SRV 3d- The number of individuals receiving transportation services supporting income and asset building (e.g.: bus voucher or pass to trainings, etc.). May need to be moved to Domain 7 Transportation	Request Change Accepted	OCS has updated this to correctly place transportation services in SRV 7.
1480	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Housing: SRV 4g - The number of households receiving weatherization services. This does not necessarily align with the FNPI 4f - The number of individuals served with energy assistance and/or energy efficiency homes. Served with energy assistance is including a service such as LIHEAP.	Request Change Accepted	OCS acknowledges this comment and appreciates this feedback. The FNPI that corresponds to weatherization has been updated to align with improved health and safety due to home improvements.
1481	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Civic Engagement and Community Involvement: Why would Leadership Training be removed from the services?	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1482	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Transportation Domain: SRV 3d - The number of individuals receiving transportation services supporting income and asset building (e.g.: bus voucher or pass to trainings, etc.). May need to be moved to Domain 7 Transportation	Request Change Accepted	OCS has updated this to correctly place transportation services in SRV 7.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1483	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Multiple Domains: Why would Case Management be removed?	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
1484	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Multiple Domains: Why were eligibility determinations removed?	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
1485	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Multiple Domains: Why would referrals be removed?	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
1486	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	The number of unemployed adults who obtained employment has been removed. This is another main indicator for CSBG eligible entities, and it is part of the CSBG Act.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1487	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Education: 2a - The number of young children (0-5) enrolled in childcare or early childhood education services. This would be service not an outcome, just being enrolled doesn't mean they complete.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1488	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Education: 2b - The number of youth actively connected to education and skills development program. This would be a service, not the outcome, just being connected doesn't mean they accomplish an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1489	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Education: 2e - The number of individua ls who enrolled in post-secondary degree program (e.g., associates, bachelors, etc.) Again, being enrolled doesn't mean they complete.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1490	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Income and Asset Building: 3a - The number of individuals completing income and asset building training. Complete a trainingdoes not mean accomplishing an outcome, what did they accomplish from completing training.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g.: service, indicator, domain)
1491	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Income and Asset Building: There are no services to match the new NPI 3b -The number of individuals who opened a savingsaccount or IDA or NPI 3c - The number of individuals who purchased a home.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
1492	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Housing: FNPI 4f- why was 'served with energy assistance' added? Is this still a Weatherization outcome or do you now count LIHEAP assistance here? If so, LIHEAP assistance is an output (service), notan outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1493	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Housing: FNPI 4g - individuals served with improved water safety in their homes - is the LIHWAP? This would be a service, not an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1494	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Health: Many of the outcomes in Domain 5 are outputs (services), not outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1495	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Health: FNPI 5b-The number of individuals with access to health coverage. This is a service	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1496	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Health: FNPI 5c-The number of individuals receiving reproductive services. This is a service	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1497	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Health: FNPI 5d -The number of individuals receiving wellness services. This is a service	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1498	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Health: FNPI 5e - The number of older adults (age 65+) receiving home visiting services. This is a service	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1499	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Health: FNPI 5g - The number of adults receiving preventative oral health services . This is a service	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1500	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Health: FNPI 5h - The number of children receiving preventative oral health services. This is a service	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1501	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Health: FNPI 5i -The number of individuals receiving access to healthy food options. This is a service	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1502	Northeast Kentucky Community Action Agency	Northeast Kentucky Community Action Agency, Inc.	Health: Why was the old 5f removed (The number of seniors (65+) who maintained an independent living situation)? To our agency supporting senior independent living, this is an important FNPI.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1503	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	BGCAP's proposal is to continue using the CSBG Annual Report 2.1. If not, there will need to befunding.to help states offset the expense of updating software systems and T/TA and offset the increase of work for BG CAP staff. The cost associated with updating the software systems would be significantly high and present amajor burden.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
1504	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	The Kentucky State Office has stated they will not change to the Federal Fiscal Year. This willprevent our funding from being correct on Module 2.	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
1505	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	BGCAP feels like this is breaking down the quality and clarity of ROMA and/or PEAAK.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1506	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	The proposed numbering format of the Modules will lead to confusion for BGCAP Staff. BGCAPproposes to maintain the existing Module numbering system (Module 4a FNPIs, Module 4bServices, Module 4c All Characteristics Report, Module 3 Community).	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1507	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	There will be a significant impact on BGCAP if we are not able to see the outcomes that clients have reached by using our annual report. BGCAP utilizes the client outcome report to communicate achievements with city and county governments and with private funders. It will be more burdensome to have to reach out to staff to request additional information.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1508	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Changing the wording of most of the outcomes to service language (received, enrolled,connected) diminishes the achievements of the outcomes. BGCAP's concern is that the qualityand effectiveness of the FNPIs and Services may be diminished. BGCAP staff will encounterdifficulties in accurately demonstrating the progress they have made in assisting individuals towards economic security.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1509	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	BGCAP proposes leaving the following in the All Characteristics Report: Single Parent Female andSingle Parent Male. This is useful for BGCAP when applying for certain grants, such as theFatherhood Initiative that BGCAP launched in the Fall of 2023. Changing the All CharacteristicReport would cause a burden for BGCAP when applying for the Fatherhood Grant and similargrants in the future.	Alternative Response	OCS acknowledges this comment and combined to reduce the burden of having to extrapolate this at the local level. Not all local agencies have the ability to split this therefore OCS suggests retaining if necessary for local efforts, but will consolidate for national reporting.
1510	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	BGCAP proposes leaving the following in the All Characteristics Report: Income Sources. Thisallows BG CAP staff to know who they are serving and helps to breakdown myths of who is served.	Request Change Accepted	OCS acknowledges this comment and has restored Module 4 Section parts 13 and 14 for household income sources.
1511	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	BGCAP is concerned with the OCS Dashboard (website) that will roll out in the future. If services are lumped together and outcomes are not present, how will this look on the website to the public, legislators, other funding sources, etc.? BGCAP is worried that this would diminish the work that a CSBG eligible entity does.	Alternative Response	OCS acknowledges this comment and all related performance management tools including websites, dashboards, and technical assistance materials will be calibrated to reflect what is reported in future years.
1512	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Employment: The number of unemployed adults who obtained employment has been removed as a FNPI. This is a very important indicator for BGCAP, and it is part of the CSBG Act. BGCAP provides services to enable individuals to obtain employment such as Job Readiness Tra ining, Resume Development, Interview Skills Training, and Employment Coaching.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1513	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Income and Asset Building Services: SRV 3d -The number of individuals receiving transportation services supporting income and assetbuilding (e.g.: bus voucher or pass to trainings, etc.). BGCAP believes this service would best fall under Domain 7 Transportation.	Request Change Accepted	OCS has updated this to correctly place transportation services in SRV 7.
1514	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Income and Asset Building Services: There are no services to match the new NPI 3b-The number of individuals who opened a savingsaccount (Suggest adding a SRV- Individuals who received a savings accounts/IDAs and other asset building accounts) or IDA or NPI 3c -The number of individuals who purchased a home (Suggest adding a SRV - Individuals that received Homebuyer Counseling and other homebuying support services). It may be assumed that these services are covered under the new SRV 3b but it would be difficult for BG CAP staff to accurately demonstrate the progress individuals have made towards economic	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1515	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Income and Asset Building Services: BGCAP provides house counseling services to assist individuals with opening a savings accountand purchasing a home.	Alternative Response	OCS appreciates this feedback and notes these services are in the Income and Asset Building domain in Annual Report 3.0.
1516	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Housing: SRV 4g - The number of households receiving weatherization services. BGCAP believes this SRV does not necessarily align with the FNPI 4f - The number of individuals served with energy assistance and/or energy efficiency homes. BGCAP believes that served with energy assistance includes services such as LIHEAP.	Request Change Accepted	OCS acknowledges this comment and appreciates this feedback. The FNPI that corresponds to weatherization has been updated to align with improved health and safety due to home improvements.
1517	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Housing: BGCAP believes that clarification is needed for SRV 4f- The number of individuals receiving housing maintenance and improvement services (e.g., structural, accessibility improvements, emergency home repairs, water safety, healthy home). Current understanding is that this service would lead to improved water safety in the home (FNPI 4g) .	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1518	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Civic Engagement and Community Involvement: BGCAP proposes to keep Leadership Training. Many individuals engage with BGCAP and receive leadership training that leads to an increase in community engagement and community involvement.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1519	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Transportation Domain: SRV 3d - The number of individuals receiving transportation services supporting income andasset building (e .g.: bus voucher or pass to trainings, etc.). BGCAP believes this service wouldbest fall under Domain 7 Transportation.	Request Change Accepted	OCS has updated this to correctly place transportation services in SRV 7.
1520	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Multiple Domains: BGCAP provides case management to more than 1,500 individuals per year. Case management reflects the encouragement and empowerment of individuals to reach their outcomes.	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
1521	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Multiple Domains: BGCAP provides/receives more than 5,000 individuals with referrals per year. Referrals reflect the engagement with community partners that enable individuals to reach their outcomes.	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
1522	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Multiple Domains: BGCAP staff complete over 12,000 eligibility determinations for clients in need of receiving services. Eligibility determinations reflect the number of individuals in need of a service fromBGCAP.	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
1523	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Employment: The number of unemployed adults who obtained employment has been removed. This is a very important indicator for CSBG eligible entities, and it is part of the CSBG Act. BGCAP has assisted at minimum 100 individuals a year with obtaining employment since COVID-19 has ended. Gaining meaningful employment is one of the first goals many individuals achieve on their Pathway outof Poverty.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1524	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Education: 2a - The number of young children (0-5) enrolled in childcare or early childhood education services. Enrolling in childhood education services is a service not an outcome. BGCAP operates multiple Child Development Programs within our 9-county service region. Many children increase their literacy skills, ability to provide attention, and become kindergarten ready during their timeenrolled.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1525	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Education: 2b - The number of youth actively connected to education and skills development program. BGCAP believes actively connected is a service, not the outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1526	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Education: 2e - The number of individuals who enrolled in post-secondary degree program (e.g., associates, bachelors, etc.) Enrolling does not mean achieving; this is a service. BGCAP currently offers postsecondary supports, such as scholarships, books/computers, and transportation to class to ensure individual are able to achieve their post-secondary goal.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1527	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Income and Asset Building: 3a - The number of individuals completing income and asset building training. Completing income and asset building training does not indicate that there has been an increase in knowledge or skills. BGCAP currently provides income and asset building training to assist individuals withmeeting their basic needs and improving their financial wellbeing.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1528	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Income and Asset Building: There are no services to match the new NPI 3b- The number of individuals who opened a savingsaccount or IDA or NPI 3c - The number of individuals who purchased a home.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
1529	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Housing: FNPI 4f- 'served with energy assistance' was added. BGCAP believes that clarification is needed to indicate if this still a Weatherization outcome or is LIHEAP assistance is included. If LIHEAP is included, it would be a service, not an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1530	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Housing: FNPI 4g - individuals served with improved water safety in their homes - is the LIHWAP? BGCAP believes that individuals served would be an output (service), not an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1531	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Health: BG CAP believes many of the outcomes in Domain 5 are outputs (services), not outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1532	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Health: FNPI 5b -The number of individuals with access to health coverage. This is an output (service), not an outcome. What is the change?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1533	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Health: FNPI 5c - The number of individuals receiving reproductive services. This is an output (service), not an outcome. What is the change?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1534	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Health: FNPI 5d - The number of individuals receiving wellness services. This is an output (service), not an outcome. What is the change?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1535	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Health: FNPI 5e -The number of older adults (age 65+) receiving home visiting services. This is an output (service), not an outcome. What is the change?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1536	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Health: FNPI 5g - The number of adults receiving preventative oral health services. This is an output (service), not an outcome. What is the change?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1537	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Health: FNPI 5h - The number of children receiving preventative oral health services. This is an output (service), not an outcome. What is the change?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1538	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Health: FNPI 5i - The number of individuals receiving access to healthy food options. This is an output (service), not an outcome. What is the change?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1539	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Health: Removal of FNPI 5f-The number of seniors {65+) who maintained an independent living situation. BGCAP administers various senior programs that allows over 2,000 seniors to maintain their living independent living situation.	Request Change Accepted	OCS acknowledges this comment and has restored the independent living siutation indicator for seniors.
1540	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	Household Level Characteristics: BGCAP proposes leaving the following in the All Characteristics Report: Single Parent Female and Single Parent Male. This is useful for BGCAP when applying for certain grants, such as the Fatherhood Initiative that BGCAP launched in the Fall of 2023 . Changing the All Characteristic Report would cause a bu rden for BGCAP when applying for the Fatherhood Grant and similar grants in the future.	Alternative Response	OCS acknowledges this comment and combined to reduce the burden of having to extrapolate this at the local level. Not all local agencies have the ability to split this therefore OCS suggests retaining if necessary for local efforts, but will consolidate for national reporting.
1541	Blue Grass Community Action Partnership	Blue Grass Community Action Partnership, Inc.	BGCAP proposes leaving the following in the All Characteristics Report: Income Sources. Thisallows BG CAP staff to know who they are serving and helps to breakdown myths of who is served	Request Change Accepted	OCS acknowledges this comment and has restored Module 4 Section parts 13 and 14 for household income sources.
1542	Miranda Allan	Greater Lawrence Community Action Council, Inc.	Greetings - Below is the Greater Lawrence Community Action Council, Inc.'s (GLCAC) comments on OCS's proposed changes to the CSBG Annual Report process. In recognition that the OMB Clearance period is brief, GLCAC's comments are limited to the CSBG Annual Report 3.0, which the agency feels contains the most alarming proposed changes. In focusing on 3.0, GLCAC does not have any comments on 2.1 to report.The proposed changes do not in fact represent a minimization of the burden of data collection and reporting; fNPIs have been collapsed, which functionally means that the collapsed datapoints are still in effect	Alternative Response	OCS utilized the burden estimate formula developed for the current annual report and adjusted it based on the reductions and kept in mind there would be initial increases in burden to account for the changes during the periods where there is an overlap of 2.1 and 3.0 reports in FY26 (3.0 is optional in FY26 before becoming mandatory in FY27) but that it would adjust over time. It should be noted that burden estimates are largely estimates and the federal office through an incremental implementation intends to provide expansive technical assistance and

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1543	Community Action Kentucky	Community Action Kentucky, Inc.	CAKs proposal is to continue using the CSBG Annual Report 2.1. If not, there will need to be funding to help states offset the expense of updating software systems and T/TA. There should also be more funding for local CSBG eligible entities, as this with cause the burden of work to be greater. The cost associated with updating the software systems could be significantly high and present a major burden.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
1544	Community Action Kentucky	Community Action Kentucky, Inc.	The Kentucky State Office has stated they will not change to the Federal Fiscal Year. This will never allow for our money to be correct on Module 2.	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
1545	Community Action Kentucky	Community Action Kentucky, Inc.	CAK feels like this is breaking down the quality and clarity of ROMA and/or PEAAK.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1546	Community Action Kentucky	Community Action Kentucky, Inc.	The proposed numbering format of the Modules will lead to confusion for CSBG eligible entities. I propose it would be more beneficial to maintain the existing Module numbering system (Module 4a FNPIs, Module 4b Services, Module 4c All Characteristics Report, Module 3 Community).	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
1547	Community Action Kentucky	Community Action Kentucky, Inc.	There will be a huge impact on the State and the State Association if we are not able to see the outcomes that clients have reached by using their annual reports. It will be more burdensome to have to reach out to each agency to request additional information to make snapshots for legislative visits, etc. (e.g., how many people did you help find employment). This will be a burden for the state association, state office, and each agency as this will require additional time	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1548	Community Action Kentucky	Community Action Kentucky, Inc.	Changing the wording of most of the outcomes to service language (received, enrolled, connected) diminishes the achievements of the outcomes. CAK has concerns that the quality and effectiveness of the FNPIs and Services may be diminishing. An agency will encounter difficulties in accurately demonstrating the progress they have made in assisting individuals towards economic security	Request Change Not Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1549	Community Action Kentucky	Community Action Kentucky, Inc.	CAK proposes leaving the following in the All Characteristics Report: Single Parent Female and Single Parent Male. This is useful for agencies when applying for certain grants (e.g., Fatherhood Initiatives, etc.). This could cause a huge burden for agencies applying for grants.	Alternative Response	OCS acknowledges this comment and combined to reduce the burden of having to extrapolate this at the local level. Not all local agencies have the ability to split this therefore OCS suggests retaining if necessary for local efforts, but will consolidate for national reporting.
1550	Community Action Kentucky	Community Action Kentucky, Inc.	CAK proposes leaving the following in the All Characteristics Report: Income Sources allows agencies to know who they are serving and helps to breakdown myths of who is served	Request Change Accepted	OCS acknowledges this comment and has restored Module 4 Section parts 13 and 14 for household income sources.
1551	Community Action Kentucky	Community Action Kentucky, Inc.	CAK has concerns with the new OCS Dashboard (website) that will roll out in the future. If we are lumping services and not showing outcomes, how will this look on the website to the public, legislators, other funding sources, etc.? We are afraid, this is weakening the work that a CSBG eligible entities do.	Alternative Response	OCS acknowledges this comment and all related performance management tools including websites, dashboards, and technical assistance materials will be calibrated to reflect what is reported in future years.
1552	Community Action Kentucky	Community Action Kentucky, Inc.	Employment: The number of unemployed adults who obtained employment has been removed as a FNPI. This is a very important indicator for CSBG eligible entities, and it is part of the CSBG Act. As referenced above, obtain employment should be included therefore, more services to explain how employment was obtained should be added (e.g., Job Readiness Training, Resume Development, Interview Skills Training, etc.).	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1553	Community Action Kentucky	Community Action Kentucky, Inc.	Income and Asset Building Service: SRV 3d – The number of individuals receiving transportation services supporting income and asset building (e.g.: bus voucher or pass to trainings, etc.). Should this be moved to Domain 7 Transportation?	Request Change Accepted	OCS has updated this to correctly place transportation services in SRV 7.
1554	Community Action Kentucky	Community Action Kentucky, Inc.	Income and Asset Building Services: There are no services to match the new NPI 3b – The number of individuals who opened a savings account (Suggest adding a SRV – Individuals who opened a savings accounts/IDAs and other asset building accounts) or IDA or NPI 3c – The number of individuals who purchased a home (Suggest adding a SRV – Individuals that received Homebuyer Counseling and other homebuying support services). You may assume that these services are covered under the new SRV 3b but again, an agency will encounter difficulties in accurately demonstrating the progress they have made in assisting individuals	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1555	Community Action Kentucky	Community Action Kentucky, Inc.	Housing: SRV 4g – The number of households receiving weatherization services. This does not necessarily align with the FNPI 4f – The number of individuals served with energy assistance and/or energy efficiency homes. Served with energy assistance is including a service such as LIHEAP.	Request Change Accepted	OCS acknowledges this comment and appreciates this feedback. The FNPI that corresponds to weatherization has been updated to align with improved health and safety due to home improvements.
1556	Community Action Kentucky	Community Action Kentucky, Inc.	Housing: Is the assumption that FNPI 4 - The number of individuals served with improved water safety in their homes - would be reached it someone had water safety which is included in SRV 4f – The number of individuals receiving housing maintenance and improvement services (e.g., structural, accessibility improvements, emergency home repairs, water safety, healthy home)?	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1557	Community Action Kentucky	Community Action Kentucky, Inc.	Civic Engagement and Community Involvement: Why was Leadership Training removed from the services?	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1558	Community Action Kentucky	Community Action Kentucky, Inc.	Transportation Domain: SRV 3d – The number of individuals receiving transportation services supporting income and asset building (e.g.: bus voucher or pass to trainings, etc.). Should this move to Domain 7 Transportation?	Request Change Accepted	OCS has updated this to correctly place transportation services in SRV 7.
1559	Community Action Kentucky	Community Action Kentucky, Inc.	Multiple Domains: Why was Case Management removed?	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
1560	Community Action Kentucky	Community Action Kentucky, Inc.	Multiple Domains: Why were referrals removed?	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1561	Community Action Kentucky	Community Action Kentucky, Inc.	Multiple Domains: Why were eligibility determinations removed?	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
1562	Community Action Kentucky	Community Action Kentucky, Inc.	Removing Services under Multiple Domains lessens an agency's work	Request Change Not Accepted	OCS acknowledges and appreciates this feedback. There are services in the current Services Supporting Multiple Domains (such as Child Care Subsidies/Payments, Day Centers, clothig assistance) that have been restructured into other domains. OCS reviewed the last five years worth of data submissions and technical requests and several of the services presented here were either underutilized or created a burden with capturing the correct unduplicated count. Therefore, OCS has removed them from the federal reporting requirement to minimize the collective
1563	Community Action Kentucky	Community Action Kentucky, Inc.	Employment: The number of unemployed adults who obtained employment has been removed. This is a very important indicator for CSBG eligible entities, and it is part of the CSBG Act.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1564	Community Action Kentucky	Community Action Kentucky, Inc.	Education: 2a – The number of young children (0-5) enrolled in childcare or early childhood education services. Enrolling in a service is an output not an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1565	Community Action Kentucky	Community Action Kentucky, Inc.	Education: 2b – The number of youth actively connected to education and skills development program. Actively connected is a service, not the outcome	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1566	Community Action Kentucky	Community Action Kentucky, Inc.	Education: 2e – The number of individuals who enrolled in post-secondary degree program (e.g., associates, bachelors, etc.) What is the change? Enrolling does not mean achieving; this is a service.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1567	Community Action Kentucky	Community Action Kentucky, Inc.	Income and Asset Building: 3a – The number of individuals completing income and asset building training. What is the change? Just because I complete a training does not mean I accomplish an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1568	Community Action Kentucky	Community Action Kentucky, Inc.	Income and Asset Building: There are no services to match the new NPI 3b – The number of individuals who opened a savings account or IDA or NPI 3c – The number of individuals who purchased a home.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g.: service, indicator, domain)
1569	Community Action Kentucky	Community Action Kentucky, Inc.	Housing: FNPI 4f – why was 'served with energy assistance' added? Is this still a Weatherization outcome or do you now count LIHEAP assistance here? If so, LIHEAP assistance is an output (service), not an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1570	Community Action Kentucky	Community Action Kentucky, Inc.	Housing: FNPI 4g – individuals served with improved water safety in their homes – is the LIHWAP? Individuals served would be an output (service), not an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1571	Community Action Kentucky	Community Action Kentucky, Inc.	Health: Many of the outcomes in Domain 5 are outputs (services), not outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1572	Community Action Kentucky	Community Action Kentucky, Inc.	FNPI 5b – The number of individuals with access to health coverage. This is an output (service), not an outcome. What is the change?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1573	Community Action Kentucky	Community Action Kentucky, Inc.	Health: FNPI 5c – The number of individuals receiving reproductive services. This is an output (service), not an outcome. What is the change?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1574	Community Action Kentucky	Community Action Kentucky, Inc.	Health: FNPI 5d – The number of individuals receiving wellness services. This is an output (service), not an outcome. What is the change?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1575	Community Action Kentucky	Community Action Kentucky, Inc.	Health: FNPI 5e – The number of older adults (age 65+) receiving home visiting services. This is an output (service), not an outcome. What is the change?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1576	Community Action Kentucky	Community Action Kentucky, Inc.	Health: FNPI 5g – The number of adults receiving preventative oral health services. This is an output (service), not an outcome. What is the change?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1577	Community Action Kentucky	Community Action Kentucky, Inc.	Health: FNPI 5h – The number of children receiving preventative oral health services. This is an output (service), not an outcome. What is the change?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1578	Community Action Kentucky	Community Action Kentucky, Inc.	Health: FNPI 5i – The number of individuals receiving access to healthy food options. This is an output (service), not an outcome. What is the change?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1579	Community Action Kentucky	Community Action Kentucky, Inc.	Health: Why was the old 5f removed (The number of seniors (65+) who maintained an independent living situation)? To agencies supporting senior independent living, this is an important FNPI.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1580	Community Action Kentucky	Community Action Kentucky, Inc.	Household Level Characteristics: I propose leaving the following: Single Parent Female and Single Parent Male. This is useful for agencies when applying for certain grants (e.g., Fatherhood Initiatives, etc.).	Alternative Response	OCS acknowledges this comment and combined to reduce the burden of having to extrapolate this at the local level. Not all local agencies have the ability to split this therefore OCS suggests retaining if necessary for local efforts, but will consolidate for national reporting.
1581	Community Action Kentucky	Community Action Kentucky, Inc.	Household Level Characteristics: I propose leaving the following in the All Characteristics Report: Income Sources allows agencies to know who they are serving and helps to breakdown myths of who is served.	Request Change Accepted	OCS acknowledges this comment and has restored Module 4 Section parts 13 and 14 for household income sources.
1582	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Employment: Helping individuals obtain employment is included in the CSBG Act and a core service for many agencies therefore services to explain how employment was obtained should remain (e.g., Job Readiness Training, Resume Development,Interview Skills Training, etc.).	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1583	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Housing: SRV 4g - The number of households receiving weatherization services. This does not necessarily align with the FNPI 4f - The number of individuals served with energy assistance and/or energy efficiency homes. Served with energy assistance is including a service such as LIHEAP.	Request Change Accepted	OCS acknowledges this comment and appreciates this feedback. The FNPI that corresponds to weatherization has been updated to align with improved health and safety due to home improvements.
1584	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Civic Engagement and Community Involvement: Why was Leadership Training removed from the services? Volunteer training isprovided for FGP, RSVP, SCP and to Head Start parents as they are helping to improve conditions in their communities.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1585	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Transportation Domain: SRV 3d - The number of individuals receiving transportation services supporting income and asset building (e.g.: bus voucher or pass to trainings, etc.). Could these be included in Domain 7 Multiple Domains and not remove these existing supporting services? Case Management, referrals, eligibility determinations.	Request Change Accepted	OCS has updated this to correctly place transportation services in SRV 7.
1586	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Employment: The number of unemployed adults who obtained employment has been removed. This is a very important indicator for CSBG eligible entities, and it is part of the CSBG Act. The proposed change unemployed youth/adults who increase skills is not the same as getting a job. Acquiring or increasing skills does not equal getting a job. You can obtain skills and still not obtain a job.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1587	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Education: 2a - The number of young children (0-5) enrolled in childcare or early childhood education services. Enrolling in a service is an output/service not an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1588	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Education: 2b - The number of youth actively connected to education and skills development program. Being connected is a service, not the outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1589	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Income and Asset Building: 3a - The number of individuals completing income and asset building training. Completing is not an outcome. What happened because of this training? What was the change?	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1590	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Income and Asset Building: Home ownership is an important milestone even if reported in low numbers.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1591	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Housing: FNPI 4f- why was 'served with energy assistance' added? Receiving a service is an output.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1592	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Housing: Suggest adding the number of individuals who avoided utility disconnect.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1593	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Health: Many of the outcomes in Domain 5 are outputs (services), not outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1594	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Health: FNPI 5b - The number of individuals with access to health coverage. This is a service. Suggestion: The number of individuals who have health coverage.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1595	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Health: FNPI 5c - The number of individuals receiving reproductive services. This is a service. Suggestion: The number of individuals who have improved skills, knowledge, ability to make decisions related to reproductive health.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1596	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Health: FNPI 5d - The number of individuals receiving wellness services. This is a service. Suggestion: The number of individuals who maintain wellness.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1597	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Health: FNPI 5e-The number of older adults (age 65+) receiving home visiting services. This is a service. Suggestion: keep 5f. The number of older adults who maintain independent living.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1598	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Health: FNPI 5g - The number of adults receiving preventative oral health services. This is a service. Suggestion: The number of adults to maintain oral health.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1599	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Health: FNPI 5h - The number of children receiving preventative oral health services. This is a service. Suggestion: The number of children who maintain oral health.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1600	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Health: FNPI 5i - The number of individuals receiving access to healthy food options. This is a service. Suggestion: The number of individuals who are better able to meet family food needs.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1601	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Health: Suggested removal of current 5d, the number of individuals who improved skills related to the adult role of parents/ caregivers. Improving parenting skills is important to Community Action programs including Head Start and Family Nurturing.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1602	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Household Level Characteristics: We propose leaving the following in the All Characteristics Report: Single Parent Female and Single Parent Male. This is useful information when applying for certain grants or working with local schools on role modeling initiatives. (e.g., Fatherhood Initiatives, Leading Ladies, etc.).	Alternative Response	OCS acknowledges this comment and combined to reduce the burden of having to extrapolate this at the local level. Not all local agencies have the ability to split this therefore OCS suggests retaining if necessary for local efforts, but will consolidate for national reporting.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1603	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Household Level Characteristics: We also propose leaving Income Sources. This information allows us to know who we are serving and helps us breakdown myths and stereotypes of who is served.	Request Change Accepted	OCS acknowledges this comment and has restored Module 4 Section parts 13 and 14 for household income sources.
1604	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Community Action of Southern Kentucky proposes to continue using the CSBG Annual Report 2.1. There will need to be increased funding for local CSBG eligible entities because this change would actually increase thework burden.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
1605	Community Action of Southern Kentucky	Community Action of Southern Kentucky	The Kentucky State Office has stated they will not change to the Federal Fiscal Year. CASOKY runs programs on from July 1- June 30 as well. A change to the Federal Fiscal Year will never allow for our money to be correct on Module 2.	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
1606	Community Action of Southern Kentucky	Community Action of Southern Kentucky	CASOKY feels the proposed changes are breaking down the quality and clarity of ROMA.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1607	Community Action of Southern Kentucky	Community Action of Southern Kentucky	The proposed numbering format of the Modules will lead to confusion for CSBG eligible entities. We believe it would be more beneficial to maintain the existing Module numbering system.	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
1608	Community Action of Southern Kentucky	Community Action of Southern Kentucky	There will be a huge impact for agencies if we are not able to see the outcomes that clients have reached by using our annual reports. The prosed changes remove our ability to tell the Community Action story of how we impact lives, communities, and help people reach self-sufficiency. We use this information to talk to community leaders, legislators, funders, etc. Results help clarify the importance of what we do (how many people we helped find jobs, how many children are now school ready, how many seniors have been able to maintain an independent living situation).	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1609	Community Action of Southern Kentucky	Community Action of Southern Kentucky	Changing the wording of most of the outcomes to service language (received, enrolled, connected) diminishes the achievements of the outcomes. I have a concern that the quality and effectiveness of the FNPIs and Services may be diminishing.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1610	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc. proposes to continue using the CSBG AnnualReport 2. 1. There will need to be increased funding for local CSBG eligible entities because this change would increase the work burden.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
1611	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	The Kentucky State Office has stated they will not change to the Federal Fiscal Year. CKCACprograms runs from July 1- June 30. This will not allow our money to be correct on Module 2.	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
1612	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	CKCAC feels the proposed changes are failing the quality and transparency of ROMA.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1613	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	The proposed numbering format of the Modules will lead to confusion for CSBG eligible entities. We believe it would be more beneficial to maintain the ex isting Module numbering system.	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.
1614	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	There will be a huge impact for agencies if we are not able to see the outcomes that clients havereached by using our annual reports.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1615	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Employment: Helping individuals obtain employment is included in the CSBG Act and a core service for many agencies therefore services to explain how employment was obtained should remain (e.g., Job Readiness Training, Resume Development, Interview Skills Training, etc.).	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1616	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Income and Asset Building Services:SRV 3d - The number of individuals receiving transportation services supporting income and asset building (e.g. : bus voucher or pass to training, etc.). Should this be moved to Domain 7Transportation?	Request Change Accepted	OCS has updated this to correctly place transportation services in SRV 7.
1617	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Housing: SRV 4g- The number of households receiving weatherization services. This does not necessarilyline up with the FNPI 4f- The number of individuals served with energy assistance and/or energyefficiency homes . Served with energy assistance includes a service such as LIHEAP.	Request Change Accepted	OCS acknowledges this comment and appreciates this feedback. The FNPI that corresponds to weatherization has been updated to align with improved health and safety due to home improvements.
1618	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Civic Engagement and Community Involvement: We see that Leadership Training has been removed from the services. Volunteer training is provided for SCP/RSVP and to Head Start parents as they are helping to improve conditions in their communities.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1619	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Transportation Domain: SRV 3d - The number of individuals receiving transportation services supporting income and asset building (e.g.: bus voucher or pass to training, etc.). Could be included in Domain 7 Multiple Domains? Case Management, referrals, eligibility determinations	Request Change Accepted	OCS has updated this to correctly place transportation services in SRV 7.
1620	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Employment: The number of unemployed adults who obtained employment has been removed. This is a veryimportant indicator for CSBG eligible entities, and it is part of the CSBG Act.A proposed change for unemployed youth/adults who increase skills would not be the same asgetting a job. Acquiring or increasing skills does not equal getting a job. Skills can be obtained andstill not obtain a job.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1621	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Education: 2a - The number of young children (0 -5) enrolled in childcare or early childhood education services. Enrolling in a service is an output (a service), not an outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1622	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Education: 2b - The number of youth actively connected to education and skills development program. Connected is a service, not the outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1623	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Income and Asset Building: 3a - The number of individuals completing income and asset building training. Completing is not an outcome. The accomplishment is needed for the outcome.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1624	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Income and Asset Building: Home ownership is an important milestone even if reported in low numbers.	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
1625	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Housing: FNPI 4f-why was 'served with energy assistance' added? A service is an output. Will LIHEAP be counted here? A service.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1626	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Health: Many of the outcomes in Domain 5 are outputs (services), not outcomes.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1627	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Health: FNPI 5b - The number of individuals with access to health coverage. A service. The outcome could be, the number of individuals who have health coverage.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1628	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Health: FNPI 5d - The number of individuals receiving wellness services. A service. The outcome could be,the number of individuals who maintain wellness .	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1629	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Health: FNPI 5e- The number of older adults (age 65+) receiving home visiting services. A service. keep 5f.The number of older adults who maintain independent living.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1630	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Health: FNPI 5g- The nu .mber of adults receiving preventative oral health services. A service.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1631	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Health: FNPI 5h - The number of children receiving preventative oral health services. A service. Theoutcome could be, the number of children who maintain oral health .	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1632	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Health: FNPI 5i - The number of individuals receiving access to healthy food options. A service. Outcomecould be. The number of individuals who are better able to meet family food needs.All Characteristics	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1633	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Household Level Characteristics: We propose leaving the following in the All Characteristics Report : Single Parent Female and Single Parent Male. This is useful information when applying for certain grants .	Alternative Response	OCS acknowledges this comment and will explore how the validations post-OMB approval may be restructured.
1634	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Household Level Characteristics: We also propose leaving Income Sources. This information allows us to know who we are serving and helps us breakdown the stereotypes of who is served.	Request Change Accepted	OCS acknowledges this comment and has restored Module 4 Section parts 13 and 14 for household income sources.
1635	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc. proposes to continue using the CSBG AnnualReport 2.1. There will need to be increased funding for local CSBG eligible entities because thischange would increase the work burden.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
1636	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	The Kentucky State Office has stated they will not change to the Federal Fiscal Year. CKCACprograms runs from July 1- June 30. This will not allow our money to be correct on Module 2.	Alternative Response	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive
1637	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	CKCAC feels the proposed changes are failing the quality and transparency of ROMA.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1638	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	The proposed numbering format of the Modules will lead to confusion for CSBG eligible entities. Webelieve it would be more beneficial to maintain the existing Module numbering system.	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1639	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	There will be a huge impact for agencies if we are not able to see the outcomes that clients havereached by using our annual reports. The prosed changes remove our ability to tell the Community Action story of how we impact lives,communities, and help people reach self- sufficiency. We use this information to talk to community leaders, legislators, funders, etc. Results help explain the importance of what we do. How many people have we helped find jobs, how many children are now school ready, how many seniors have been able to maintain an independent living situation.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1640	Central Kentucky Community Action Council, Inc.	Central Kentucky Community Action Council, Inc.	Changing the wording of most of the outcomes to service language (received, enrolled, connected)lessens the achievements of the outcomes. We need to be able to accurately demonstrating the progress, they have made in assisting individuals towards economic security.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1641	Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc.	Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc.	The progress of individuals and families moving out of poverty is not linear. Poverty is generational and can be cyclical (including bringing people back to baseline after national economic hardships i.e. the pandemic, the dot-com bubble, recessions). The greatest achievement of the War on Poverty has been the effect of programs and services-the way they are designed-by and with consideration of the needs of people with low incomes. Measuring the success of helping individuals and families therefore must take into consideration all the steps (many different types of services and strategies) and causal links to short-term and long-	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1642	Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc.	Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc.	CAC recommends that the Office of Community Services (OCS) adopt the CSBG AnnualReport 2.1 and continue to engage the Community Action Network in a thoughtfulprocess that would pave the way for a more comprehensive and well-informed CSBGAnnual Report 3.0.The CSBG Act requires that Community Action Agencies (CAAs) create services andstrategies that address the specific needs of their communities; in Kentucky, by statestatute, community action agencies develop a community needs assessment every year.The approaches employed by CAAs that are directly tied to their needs assessment areinherently localized and	Alternative Response	OCS acknowledges this comment and highlights that we followed the process governed by ACF, HHS and the Office of Management and Budget through the formal Paperwork Reduction Act (PRA) approval process to include the 60-day public comment period and 30-day comment period directly to OMB. All comments submitted are reviewed as a response to the proposed changes and this exercise is about ensuring the federal government adheres to its responsibilities under PRA. OCS added the listening sessions and extensive supplemental materials to provide an
1643	Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc.	Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc.	CAC suggests adopting the CSBG Annual Report 2.1 to prevent agencies and state entities from bearing the expenses of restructuring their data systems. Additionally, it avoids the need to allocate resources and time for training, especially considering that many front-line staff have less than two years of experience at their community action agency.	Alternative Response	OCS acknowledges this comment and emphasizes the majority of the proposed changes are removal of data points that underutilized which should result in a reduced number of what systems are required to collect. Similarly, sub grant recipients collecting information that is reported to multiple federal agencies has been reduced to avoid duplication. OCS will work to issue guidance on how states and their sub grant recipients can leverage existing resources such as admin funding to address system changes for a routine process such as updated information collection
1644	Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc.	Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc.	The Cabinet for Health and Family Services, as communicated to our state association,Community Action Kentucky, has stated its intent not to report on a federal fiscal year basis. IfOCS transitions to aligning the report with the federal fiscal year, CAC (along with all other Kentucky CAAs) will be out of sync with the reporting requirements set by the state. Thisdiscrepancy will likely require additional technology and human capital investments to manage separate reporting cycles.CAC recommends maintaining the current reporting year.	Request Change Not Accepted	OCS aims to shift the entire country to federal fiscal year reporting solely for CSBG reports so when we compile and aggregate the data, we're using the same point in time. This does not change how states manage their funds but the periods that they report their services. This will show up in minor changes and reduction of information in subsequent elements of the report where states and eligible entities are repeatedly being asked to confirm the reporting year. We anticipate this to be a minor change as we reviewed federal funding that many of our state and local agencies receive

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1645	Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc.	Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc.	CAC appreciates that with a new service-to-outcome plan, OCS is interested in showcasing the alignment of services to outcomes. CAC recommends OCS provide additional information on the implementation, such as whether reporting a service is required to report a corresponding outcome. As OCS is aware, certain services do not align neatly with specific outcomes, or with only one outcome, which can introduce complexity and frustration when determining how best to report the support provided to an individual or family.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1646	Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc.	Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc.	The proposed changes eliminate the reporting of critical services such as case management,eligibility determinations, and referrals. These and other services are fundamental to ourcommunity action agency's main work, which focuses on meeting individuals where they are,identifying their most pressing needs, and connecting them or working with them to access local resources and assets-whether our own or from community partners-for them to increase intheir self-sufficiency. This comprehensive continuum of support for individuals and familiesdefines the essence of a community action agency. These services should	Request Change Accepted	OCS acknowledges this comment and appreciates the feedback. OCS is keenly aware of the vital role processes and services such as case management, referral, and eligibility determinations play in connecting individuals and families with low income to services with the goal of achieving self-sufficiency. OCS has added a component to the report that measures the number of individuals that receive these types of services under Service Delivery and Access. The goal with this updated revision is to capture the component of the story of how individuals are connected to
1647	Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc.	Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc.	The information CAC reports to the state and, through it, to the national offices and Congress must allow us to clearly articulate the evidence-based and thoughtful interventions, strategies, and services we employ to create meaningful change.CAC, and all community action agencies, are economic development organizations-and thecore of economic development for most people, families, and communities is employment,income, and asset building. CAC's commitment extends beyond assisting individuals in securingjobs as mandated by the CSBG Act; we aim to support individuals in obtaining, retaining, andadvancing in	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an 'other' with requirement of description.
1648	Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc.	Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc.	In consolidating the reportable Family/Individual National Performance Indicators (NPIs), CACis very concerned that the story about the work of our CAA, along with the national network,will be diminished. CAC wants to retain outcome-focused reporting, which not only aligns withthe principles and framework of ROMA but helps inform others about the changes we areassisting individuals and families to make in their lives, and not just focusing on outputs-which,by design, do not tell a complete story nor emphasize change. If the breadth of outcomesavailable to report is removed, the story being told about the investment of federal dollars	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1649	Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc.	Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc.	The reporting of community-level work/transformation should not be considered by OCS asoptional, nor should community-level work not be counted unless it is "new."In 2017, CAC launched a pilot initiative providing coursework and training to assist individualswith low incomes in obtaining their Commercial Driver's Permit and License-Class B withPassenger Endorsements. This initiative was initiated in response to a critical local need: thesevere shortage of qualified bus drivers in our region's largest school district.The project has had a profound transformative effect on our community, leading to its expansionand growth. One of the key	Request Change Not Accepted	OCS acknowledges this comment and notes that Community Level Transformation is recommended but not required due to the content of submissions in previous years, indicating the need for increased technical assistance and also keep in mind there are a vast array of state and local agencies that may not have the capacity to carry out a transformation initiative based on their funding levels. OCS believes that with enhanced training and technical assistance once we have addressed data validity in the current reporting structure, we can work collectively to build capacity
1650	Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc.	Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc.	Removal of Housing Income Sources: Excluding household income data from the report does not reduce burden, as this information isalready required for eligibility assessment. Moreover, failing to report household income datacould perpetuate misconceptions about the individuals and families we serve. Our clients deservea complete representation through accurate data that tells their full story.Recommendation: CAC recommends that OCS retain the ability to report household income as part of itsdemographic reporting.	Request Change Accepted	OCS acknowledges this comment and has restored Module 4 Section parts 13 and 14 for household income sources.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1651	Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc.	Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc.	It's concerning that sections of the report capturing program datasets that cannot be unduplicated are proposed to be removed from demographics. This poses a risk of underreporting the true impact of programs.Recommendation:• CAC recommends retaining the ability to report program data that cannot be unduplicatedto ensure that the full picture of the work of our agency has a place within the report. Wetypically serve 12,329 people in those datasets, and we must have the ability to reportthose efforts in some way.	Alternative Response	OCS appreciates this feedback and notes the counts are still to remain unduplicated.
1652	Central Missouri Community Action	Central Missouri Community Action (CMCA)	The proposed changes outlined in the CSBG Annual Report 3.0 overall do not reflect understanding of the breadth and depth of blended services provided to our families and minimizes the importance of community level initiatives by CMCA and Community Action agencies around the nation.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1653	Central Missouri Community Action	Central Missouri Community Action (CMCA)	It is crucial for agencies to be able to individualize their Community Services Block Grant (CSBG) funds to create plans to address the needs that arise from the triennial Community Needs Assessment (CNA) process through their internal Strategic Plan. The CSBG Act requires CAA's to develop services and community initiatives in direct response to identified community needs. The needs and strengths are vastly different between geographic regions in the United States, and the current selection of CSBG NPIs and services allows us to reflect our unique combination of services within the current Annual Report 2.1.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1654	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CSBG National Program Goals are clearly identified in the CSBG Act to 1) reduce poverty, 2) empower low-income families and individuals to become self-sufficient, and 3) revitalize low-income communities (42 U.S.C. § 9901(1)). Performance measures 12A and 12B outline both individual developmental outcomes as well as community-wide transformation initiatives to address the causes and conditions of poverty. The proposed change to CSBG Annual Report 3.0, with the current Module 4 (Individual and Family Level) becoming Module 3, and the current Module 3 (Community Level Transformation) becoming Module 4 creates concern	Request Change Not Accepted	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations. OCS acknowledges this comment and notes that Community Level Transformation is recommended but not required due to
1655	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA received the April 22, 2024, Dear Colleague letter ACF-OCS-DCL-24-09-Annual Report 3.0 Revisions along with a CSBG Annual Report Disposition Indicator List with all proposed revisions. OCS is proposing a decrease in FNPIs reported in CSBG Annual Report 3.0. Unintentionally OCS is thereby limiting CAA reportable outcomes, requiring financial resources and staff time for training, as well as necessary data system updates. This change runs the risk of weakening the connections between our unique set of services, outputs and outcomes, most notably in our Whole Family Approach model, requiring a bundled services	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1656	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA recommends keeping "z" level indicators in the Annual Report 3.0. This allows individualization of our services. These specific indicators allow us to record measurable gains or losses in innovative programming and evaluate their effectiveness.	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an 'other' with requirement of description.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1657	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA recommends leaving FNPI 1b: The number of unemployed adults who obtained employment with slight written revisions as it is not necessary to differentiate between 1b and 1e if the option to record “obtained employment” remains and is clearly distinguished between youth (up to age 24) and adults (over age 24).	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1658	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA agrees with the elimination of FNPI 1c, 1d, 1fand 1g, as it has been burdensome measuring employment retainment on the schedule required in Annual Report 2.1. We do see the importance of measuring employment retainment and recommend keeping an employment retention FNPI to measure adults who maintain employment for 90 days.	Alternative Response	OCS appreciates this feedback.
1659	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA recommends keeping FNPI 2d: The number of children and youth who are achieving at basic grade level (academic, social, and other school success skills). This outcome is used at our agency and assists in showing the impact of our Whole Family Approach and Head Start programs. It is unnecessary to break down this data point by grade level. Keeping FNPI 2d without grade level specification will reduce the administrative burden while allowing us to continue reporting this critical outcome.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1660	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA recommends FNPI 2e: The number of parents/caregivers who improved their home environments remains as written. Working in close partnership with Children’s Division and child abuse prevention, the home environment is often a focus of goal development in our Whole Family Approach.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1661	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA operates a Financial Opportunity Center as well as a Women’s Business Center. The changes proposed in FNPI goal area 3 is quite limiting and does not capture the breadth and scope of our financial focus. CMCA recommends not changing any current Income domain NPIs as they are written in Annual Report 2.1.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1662	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA recommends keeping FNPI 5d: The number of individuals who improved skills related to the adult role of parents/caregivers. Working in close partnership with Children’s Division and with a focus on child abuse prevention, the relationship between guardians and children is of upmost importance in serving the whole family.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1663	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA recommends keeping all SRV 1a-1q (Employment Services) as written. While we support the consolidation of reportable services in the CSBG Annual Report 3.0, the Employment domain services SRV 1a-q are vital to telling the story of our families working toward career goals. The proposed revision of services is limited to outputs and appears to devalue the coaching model we have worked tirelessly to implement at CMCA.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1664	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA recommends keeping SRV 2l-SRV2q (Adult Education & Skill Development Programs) as currently written in CSBG Annual Report 2.1. This proposed change has eliminated parenting supports and post-secondary education, both key elements to our Whole Family Approach model at CMCA.	Alternative Response	OCS acknowledges this comment are restored a service specific to basic adult education that may precede a diploma.
1665	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA recommends wording revision to SRV 2cc Home Visits (Home Visits) to "The number of families participating in evidence-informed home visiting services." CMCA operates robust home visiting programs, within our Early Head Start, Homebased Early Head Start, Head Start and BRIDGE programs at CMCA Nearly 60 years operating the two-generation approach has led us to forming our current Whole Family Approach model, which requires a home visit component for some elements of our model.	Alternative Response	OCS acknowledges this comment and aims to keep the written indicators written in plain language for public access. The supplemental guides for reporting to be released post-OMB approval will include additional guidance on models and evidence-based strategies.
1666	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA recommends keeping SRV 3a, 3b, 3c, 3e, 3f, 3m, 3n and 3o (Income Management and Asset Building) to avoid reducing the vital importance and impact of a variety of financial and income services provided to our members. CMCA operates a nationally recognized Rural LISC Financial Opportunity Center (FOC), requiring us to use all of the currently available services in our FOC delivery model as we help members work toward economic growth goals.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1667	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA recommends SRV 3b, the number of individuals that received business and entrepreneurial financial services, should not be connected to a "concrete support." CMCA operates the Missouri Women's Business Center (WBC), employing business coaches to help with business start up and more recently partnered with the local Regional Economic Development to start a retail incubator in downtown Columbia, MO. The coaching work done in the WBC is individualized to each business owner and often stretches for long periods oftime over multiple coaching sessions. It is imperative we can tell the story of small business owner success in	Request Change Accepted	OCS acknowledges this comment and notes this is no longer listed as a concrete support due to the inclusion of supportive non-tangible services such as entreprenurial support that may be in the form of coaching. There is also a clear NPI connected to this service.
1668	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA recommends deleting Annual Report 2.1 SRV 3d-Services Supporting Income and Asset Building- as it is subjective and lacks clarity in practice.	Alternative Response	OCS has updated this to correctly place transportation services in SRV 7.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1669	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA recommends keeping SRV 4a-4b Housing Payment Assistance to show direct financial assistance provided as currently written in Annual Report 2.1. This category of the annual report is used for other funding sources who directly fund housing financial assistance at CMCA. A change in the report in this category will cause an unnecessary agency burden.	Request Change Not Accepted	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1670	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA recommends wording revision of SRV 4c to “Eviction Prevention Coaching” instead of Annual Report 2.1 wording “Eviction Prevention Services.” This wording change is preferred over eliminating it completely from Annual Report 3.0. Our CMCA “Coach approach” model is built on a strengths-based theory of change with housing stability and eviction prevention seen as a priority need for our community members.	Request Change Not Accepted	OCS acknowledges this comment and notes the term services is more inclusive of other models that may differ across the country but carry the same outcome of preventing eviction.
1671	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA recommends keeping SRV 4f -Housing Placement and Rapid Rehousingand SRV 4g-Weatherization as currently written in CSBG Annual Report 2.1. Any change will affect our annual reporting with the contracted Management Information System. We currently record home repairs outside Weatherization funded services in SRV 4f.	Alternative Response	OCS acknowledges this comment and notes those services can still be captured under weatherization. Post-OMB approval, OCS will issue additional guidance on what services count under a specific indicator.
1672	Central Missouri Community Action	Central Missouri Community Action (CMCA)	Reinstate SRV 6b- Leadership Training as currently written in CSBG Annual Report 2.1. CMCA holds Step Up to Leadership training for our low-income members to learn civic engagement and leadership skills. We are able to recruit low-income board members for both our own non-profit and other partner agencies in our communities once they have completed the 12 week course. The CSBG Act clearly articulates the requirement to engage and empower low-income persons and revitalize communities. Removing Leadership Training eliminates our capacity to report the work done in this domain area.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1673	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA recommends refinement in the language in the Service to Outcome Plan to clearly demonstrate that concrete economic supports are not only tangible services to support economic mobility, but also address economic security or ongoing stability.	Alternative Response	OCS acknowledges this comment. Concrete supports have traditionally been in the report but have not had a clear delineation into how they may be counted. Research in human and social services highlights the outcome of providing concrete supports lead to a better quality of life because basic needs are met. At the national level, the goal would be shape the reporting narrative by showing all these concrete supports as a performance measure along with the other indicator to tell the broader story. For example, SRV 1c which provides supplies for employment like work boots
1674	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA recommends reconsideration of adding a new Transportation domain to Annual Report 3.0. Transportation initiatives should largely remain reported at the community level (CSBG Annual Report 2.1 Module 3) to avoid administrative burden on collecting individual passenger information for large scale transportation initiatives. CMCA recommends the continued use of SRV 7a – 7e (Transportation) for capturing individual level outcomes for annual reporting purposes.	Alternative Response	OCS acknowledges this comment and emphasizes the unit of measurement for the transportation domain is not the individual rider due to limitations in capturing that information but by the units already captured by way of inventory such as gas cards, vouchers, etc.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1675	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA recommends reinstating the requirement to capture both single parent female and single parent male designated households for CSBG Annual Report 3.0 Module 3, Section B, D- Household Characteristics, 9) Household Type. This data allows CMCA to make informed decisions regarding the population we are serving and align programmatic goals to fit with the population demographics. This information can also help inform other grant opportunities that will add value to the specified single parent population array of available services.	Alternative Response	OCS acknowledges this comment and combined to reduce the burden of having to extrapolate this at the local level. Not all local agencies have the ability to split this therefore OCS suggests retaining if necessary for local efforts, but will consolidate for national reporting.
1676	Central Missouri Community Action	Central Missouri Community Action (CMCA)	CMCA recommends retaining the household income source data point in demographics reporting in CSBG Annual Report 3.0 Module 3 Section C: All Characteristics Report, D.13. It is imperative in working with individuals toward economic upward mobility in our Financial Opportunity Center we are able to capture sources we categorize as “income supports,” (i.e. SNAP, TANF, WIC, HCVformally Section 8). We measure success through increasing earned net income and reducing household debt. By recording a household’s sources of income, we can better establish a budget and then tell the story behind someone’s	Request Change Accepted	OCS acknowledges this comment and has restored Module 4 Section parts 13 and 14 for household income sources.
1677	cott Carver Dakota CAP Agency, Inc.	Community Action Partnership of Scott, Carver, and Dakota Counties	We believe the revisions to the CSBG are a positive step forward as multiple categories from the CSBG Annual Report 2.1 will be updated, combined, or eliminated in the CSBG Annual Report 3.0. This will streamline the process, particularly in reducing the time needed to complete the report each year.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1678	cott Carver Dakota CAP Agency, Inc.	Community Action Partnership of Scott, Carver, and Dakota Counties	The data and information collected align appropriately with the objectives of our programs	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1679	cott Carver Dakota CAP Agency, Inc.	Community Action Partnership of Scott, Carver, and Dakota Counties	We find that the clarity of the information collected has improved compared to the previous 2.1 version. For instance, in the Education and Cognitive Development Services section of the CSBG Annual report 2.1 (category 2.a), the information was limited to Early Head Start. Conversely, the CSBG Annual Report 3.0 provides a more detailed description within the same section and category, specifying "The number of individuals (age 0-3) receiving Early Head Start Services."	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1680	cott Carver Dakota CAP Agency, Inc.	Community Action Partnership of Scott, Carver, and Dakota Counties	While there will be an adjustment period, we believe that the burden resulting from the changes is manageable. The primary challenge lies in the time required for our agency to communicate and adapt to the modifications necessary for the future CSBG Annual Report. The presence of a transition period allows us to make necessary preparations effectively.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1681	cott Carver Dakota CAP Agency, Inc.	Community Action Partnership of Scott, Carver, and Dakota Counties	The process of consolidating data and identifying unduplicated number proves to be the most time-consuming aspect of the reporting process.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1682	Chandra Alexandre	Community Action Marin	Response to Community Services Block Grant (CSBG) Annual Progress Report, OMB #0970-0492 Thank you for the opportunity to provide feedback on the proposed changes to the CSBG Annual Report. Community Action Marin was founded in 1966, and in 1967 the Marin County Board of Supervisors designated Community Action Marin as the county's official antipoverty agency, with a mandate to work to eliminate the causes and consequences of poverty in Marin County. We are proud to carry that mandate forward today as the largest non-profit social services provider in the county. Our Mission: We make it possible for	No Change or Response Needed	No response required.
1683	Chandra Alexandre	Community Action Marin	1. Whether the proposed collection of information is necessary for the proper performance measurement of federal, state, or local agencies. • We support CalCAPA's comments	No Change or Response Needed	No response required.
1684	Chandra Alexandre	Community Action Marin	2. The quality of the information to be collected. • Many of the FNPIs are worded as outputs rather than outcomes. While outcomes are more difficult to document, the rigor involved is consistent with ROMA principles and helps better reflect the Community Action goals of alleviating the causes and conditions of poverty. See CalCAPA's comments for detailed comments and examples.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1685	Chandra Alexandre	Community Action Marin	3.The clarity of the information to be collected. • The Service to Outcome Plan is an excellent addition to the CSBG Annual Report resources.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1686	Chandra Alexandre	Community Action Marin	• Suggested improvements to the Service to Outcome Plan: o Domain 3 Income and Asset Building is incorrect and incomplete. Incorrect because it maps SRV 3 to FNPI 1. Incomplete because it doesn't include SRV 3d or any FNPI 3a-c.	Request Change Accepted	OCS acknowledges and has incorporated this feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1687	Chandra Alexandre	Community Action Marin	• Suggested improvements to the Service to Outcome Plan: o Domain 3 Income and Asset Building is incorrect and incomplete. Incorrect because it maps SRV 3 to FNPI 1. Incomplete because it doesn't include SRV 3d or any FNPI 3a-c.	Request Change Accepted	OCS acknowledges and has incorporated this feedback.
1688	Chandra Alexandre	Community Action Marin	o SRV 1a & 1b should also map to FNPI 2d because it includes vocational skills (which comes from Domain 1 SRVs	Request Change Accepted	OCS acknowledges and has incorporated this feedback
1689	Chandra Alexandre	Community Action Marin	o SRV 4d (utility assistance) is proposed as concrete support. We suggest associating SRV 4d with a new FNPI 4xx "avoided utility shut-off or had utility service restored"	Request Change Accepted	OCS acknowledges and has incorporated this feedback.
1690	Chandra Alexandre	Community Action Marin	4. Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of collection. • Accurate data collection and reporting requires effort, and thus will place some burden on CAAs. Ideally the effort/burden in data collection and reporting will be commensurate with the value provided to elected officials in Washington, D.C. in deciding on funding of CAAs through CSBG. For our agency, the burden is worth it if the data is being used by our elected officials.	Alternative Response	OCS acknowledges this comment and appreciates the feedback. The report revisions were to ensure we addressed the expansive nature of performance measures across CSBG while meeting the requirements of the CSBG Act, the findings of the CSBG Government Accountability Office (GAO) report, and minimize the burden on the public under the Paperwork Reduction Act. The connection between service to outcome also enhances how we tell the national story of CSBG.
1691	Chandra Alexandre	Community Action Marin	• The burden of data collection could be minimized if it was easier to gain access to data systems used by CAAs but managed by government agencies. For example, the burden of data collection related to serving unhoused clients could be reduced if CAAs were given access (e.g. via API) to Homeless Management Information Systems (HMIS) used by counties.	Alternative Response	OCS acknowledges this comment and appreciates the feedback, the state systems are outside of our purview but OCS has invested in the CSBG Performance Management Website which provides a dynamic display of data submitted to the federal office.
1692	Chandra Alexandre	Community Action Marin	6. What, if any, additions, revisions, or modifications to the information collection would you suggest? • We recommend maintaining the ability to add agency-specific outcomes (currently designated as "FNPI-z"). Eliminating this flexibility is not consistent with the Community Action principle of meeting the needs of the diverse communities we serve. In the same vein, we suggest adding similar flexibility for agency-specific services.	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an 'other' with requirement of description.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1693	Chandra Alexandre	Community Action Marin	• As mentioned in item 4 above, add an FNPI 4xx “avoided utility shut-off or had utility service restored"	Request Change Accepted	OCS acknowledges and has incorporated this feedback.
1694	Chandra Alexandre	Community Action Marin	• The proposed Module 4 Community Level Transformation continues to be optional – we recommend making it required. While reporting on Community Level services and outcomes is time consuming, these efforts are consistent with the goals of Community Action and it is important elected officials in Washington, D.C. who vote to continue CSBG funding are aware of community level efforts and impacts of CAAs.	Alternative Response	OCS acknowledges this comment and notes that Community Level Transformation is recommended but not required due to the content of submissions in previous years, indicating the need for increased technical assistance and also keep in mind there are a vast array of state and local agencies that may not have the capacity to carry out a transformation initiative based on their funding levels. OCS believes that with enhanced training and technical assistance once we have addressed data validity in the current reporting structure, we can work collectively to build capacity
1695	Chandra Alexandre	Community Action Marin	(This module could be simplified and streamlined to lessen the reporting burden.)	Alternative Response	OCS acknowledges this comment and appreciates the feedback.
1696	Chandra Alexandre	Community Action Marin	Thank you for the opportunity to provide feedback on the proposed CSBG 3.0 changes.	No Change or Response Needed	No response required.
1697	Brittany Poe Luxton	WAMY Community Action, Inc.	Dear OCS,Please find below comments from WAMY Community Action, Inc., a community action in Boone, North Carolina covering four counties, Watauga, Avery, Mitchell, and Yancey. Thank you for the opportunity to submit our comments.June 21, 2024CSBG Annual Report Proposed 3.0Comments from WAMY Community Action, North Carolina	No Change or Response Needed	No response required.
1698	Brittany Poe Luxton	WAMY Community Action, Inc.	I. Changes in Report Structure: We (WAMY Community Action-NC) initially watched and experienced the struggle of understanding how module 3 worked. Leave it as it is.	Alternative Response	OCS reviewed the data and looked at equity across our data collection for all grant recipients to include states, tribes, and territories. Under the proposed reporting schema, switching the modules would ensure when OCS refers to Module 3 across the entire network, it's capturing the same type of information whether the grant recipient is a state, territory, or tribe. Keeping the modules as is would exclude CSBG direct-funded tribes and tribal organizations.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1699	Brittany Poe Luxton	WAMY Community Action, Inc.	Additionally, data systems make it difficult and burdensome to report, not the actual report itself - having to pull from many systems and make it fit the categories is where the burden lies	Alternative Response	OCS acknowledges this comment and appreciates the feedback, the state systems are outside of our purview but OCS has invested in the CSBG Performance Management Website which provides a dynamic display of data submitted to the federal office.
1700	Brittany Poe Luxton	WAMY Community Action, Inc.	II. Changes in Reporting Period: We do not currently have the systems in place to easily report on a different fiscal year.	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical
1701	Brittany Poe Luxton	WAMY Community Action, Inc.	III. Removal of CSBG Domain: Services Supporting Multiple Domains: There are some initiatives that we have (SFS), community garden that it is not possible to track how many unduplicated individuals - further these are existing community wide initiatives, and we will not be able to demonstrate the full work we are doing.	Alternative Response	OCS acknowledges and appreciates this feedback. There are services in the current Services Supporting Multiple Domains (such as Child Care Subsidies/Payments, Day Centers, clothig assistance) that have been restructured into other domains. OCS reviewed the last five years worth of data submissions and technical requests and several of the services presented here were either underutilized or created a burden with capturing the correct unduplicated count. Therefore, OCS has removed them from the federal reporting requirement to minimize the collective
1702	Brittany Poe Luxton	WAMY Community Action, Inc.	IV. Addition of New Transportation Domain: We like the transportation addition - we are seeing a lot more of this in our work and in our community needs assessment preliminary data and are excited to be able to further report on our efforts.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1703	Brittany Poe Luxton	WAMY Community Action, Inc.	VII. Streamlining of Reportable Services: Narrowing the categories of reporting increases burden on our staff to recategorize our work, further it does not offer the full picture of what our community action agency is doing.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1704	Brittany Poe Luxton	WAMY Community Action, Inc.	VIII. Consolidation of Family and Individual Outcomes (New Module 3): We would like to see being able to have cross domain services - we utilize central intake to take the burden off of families - when someone applies, our intake specialist is looking at more than just what the family came in for, he considers all internal programs and other agencies to then make referrals - we will not be able to report this critical work he does and our efforts to comprehensively meet family needs and lean into the whole family approach.	Alternative Response	OCS acknowledges and appreciates this feedback. There are services in the current Services Supporting Multiple Domains (such as Child Care Subsidies/Payments, Day Centers, clothig assistance) that have been restructured into other domains. OCS reviewed the last five years worth of data submissions and technical requests and several of the services presented here were either underutilized or created a burden with capturing the correct unduplicated count. Therefore, OCS has removed them from the federal reporting requirement to minimize the collective

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1705	Brittany Poe Luxton	WAMY Community Action, Inc.	IX. Inclusion of Outputs in the Family National Performance Indicators: Reducing the number of FNPIs limits the understanding and spirit of CSBG - it needs to be clear across the board that CSBG supports broad initiatives and services based on identified community needs.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1706	Donna Pace and Mistie Sanders	Harlan County Community Action Agency, Inc.	Good afternoon,Thank you for allowing us a chance to talk about the proposed modifications to the CSBG Annual Report.Enclosed, you will find detailed comments from Harlen County CAA team, we have carefully reviewed the proposed changes to the CSBG Annual Report and have complied our thoughts and suggestions for your consideration.	No Change or Response Needed	No response required.
1707	Donna Pace and Mistie Sanders	Harlan County Community Action Agency, Inc.	Although some may feel the changes to be less cumbersome and save time, it truly diminishes the important service and outcomes of CSBG and it shows it's significant importance to individuals and families.	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1708	Donna Pace and Mistie Sanders	Harlan County Community Action Agency, Inc.	1. There will be a huge impact on the State and the State Association if they are not able to see the outcomes that clients have reached by using the annual reports. If not using the annul report there is no way of showing how many clients received an outcome and not just a service. This will be a burden to all agencies as this will require additional time and reporting.	Alternative Response	OCS is continuing to collect both services (outputs) and outcomes (performance indicators).
1709	Donna Pace and Mistie Sanders	Harlan County Community Action Agency, Inc.	2. Changing the wording of most of the outcomes to service to language (received, enrolled) diminishes the achievements of the outcome. Harlan CAA has concerns that the quality and effectiveness of the FNOIs and Services may be diminishing. Our agency will have difficulties in accurately demonstrating the process we have made in assisting our clients towards economic security.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1710	Donna Pace and Mistie Sanders	Harlan County Community Action Agency, Inc.	3. Harlan CAA has concerns with the new OCS Dashboard website that will roll out in the future. If Harlan CAA is lumping services and not showing outcomes, how will this look on the website to the public, legislators, and other funding sources, etc.? We are afraid, this will weaking the work that CSBG eligible entities do.	Alternative Response	OCS acknowledges this comment and all related performance management tools including websites, dashboards, and technical assistance materials will be calibrated to reflect what is reported in future years.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1711	Donna Pace and Mistie Sanders	Harlan County Community Action Agency, Inc.	4. Harlan CAA proposes leaving the following in the All-Characteristics Report: Income sources allows us to know who we are serving and helps to breakdown myths of who we served.	Request Change Accepted	OCS acknowledges this comment and has restored Module 4 Section parts 13 and 14 for household income sources.
1712	Donna Pace and Mistie Sanders	Harlan County Community Action Agency, Inc.	We sincerely appreciate your time and the thoughtful consideration you are giving these critical matters.	No Change or Response Needed	No response required.
1713	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc. (UDMO) is one of sixteen Community Action Agencies in Iowa.UDMO is dedicated to helping build stronger communities by addressing the effects of poverty onindividuals and families. The UDMO Administrative Team appreciates the review of the CSBG reporting measures and the attempts to reduce the burden for tracking and reporting.After our review of the proposed changes, the UDMO team notes the following:	No Change or Response Needed	No response required.
1714	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	• There are some indicators that need additional clarification and are noted below.	No Change or Response Needed	No response required.
1715	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	• The removal of some NPI's is concerning, in that, once removed, will that eventually be a service not allowed to be supported by CSBG funds.	Alternative Response	OCS acknowledges this comment and notes the flexibilities with the funding are not impacted by what is reported. The reporting schema provides a national summary of performance.
1716	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	Following are UDMO comments specific to each indicator.Service: Employment1d. – This indicator is burdensome, unclear where this info can be reported and tracked in any current data systems.	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1717	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	Suggested Edits:Take current 2.1 CSBG 1.a # of unemployed adults who obtain employment and make that 1d to track the outcome of becoming employed.	Request Change Accepted	OCS revised and added in FNPI 1d and 1e to reflect youth and adult who obtained employment.
1718	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	Post-Employment HeadingUDMO can separate unemployed and employed that are receiving this service in the current data system.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1719	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	Service: Education 2a. – Clarify if this is cumulative or a point in time count of children	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1720	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	2b. – Clarify if this is cumulative or a point in time count of children	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1721	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	2d. – Many programs track early childhood services, but do not differentiate what program (HS, EHS, Childcare)	Alternative Response	OCS acknowledges this feedback and shifted the wording to capture age categories and included a category that notes services that may not be Head Start but the same age group.
1722	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	2e. – UDMO does not collect this data	Alternative Response	OCS appreciates this feedback and as with the current reporting structure, if a service is not offered, subrecipients should enter '0'.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1723	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	2f. – UDMO does not collect this data on young adults vs. adults (18+)	Alternative Response	OCS appreciates this feedback and as with the current reporting structure, if a service is not offered, subrecipients should enter '0'.
1724	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	2g. – UDMO does not collect this data	Alternative Response	OCS appreciates this feedback and as with the current reporting structure, if a service is not offered, subrecipients should enter '0'.
1725	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	2h. – UDMO tracks and CAN report this data	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1726	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	2i. – UDMO does not collect this data2j. – UDMO does not collect this data2k. – UDMO does not collect this data	Alternative Response	OCS appreciates this feedback and as with the current reporting structure, if a service is not offered, subrecipients should enter '0'.
1727	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	2l. – UDMO tracks and CAN report this data2m. – UDMO tracks and CAN report this data2n. – UDMO tracks and CAN report this data2o. – UDMO tracks and CAN report this data2p. – UDMO tracks and CAN report this data2q. – UDMO tracks and CAN report this data	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1728	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	2r. – Define evidenced-based home visiting to clarify what programs qualify under this FNPI.UDMO tracks and can report this data	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1729	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	Service: Training and Counseling , Benefit Coordination and Advocacy, Services Supporting Income and Asset Building3a. – UDMO tracks and CAN report this data	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1730	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	3b. – UDMO does not offer programming that provides this service	Alternative Response	OCS appreciates this feedback and as with the current reporting structure, if a service is not offered, subrecipients should enter '0'.
1731	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	3c. – UDMO tracks and CAN report this data3d. – UDMO tracks and CAN report this data	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1732	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	Service Area: Housing Services 4a. – UDMO tracks and can report this data	Alternative Response	OCS appreciates this feedback and as with the current reporting structure, if a service is not offered, subrecipients should enter '0'.
1733	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	4b. – UDMO does not offer programming that provides this service	Alternative Response	OCS appreciates this feedback and as with the current reporting structure, if a service is not offered, subrecipients should enter '0'.
1734	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	4c. – UDMO tracks and CAN report this data	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1735	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	4d. – UDMO tracks and CAN report this data (Outreach, LIHEAP, Housing)	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1736	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	4e. – UDMO tracks and CAN report this data	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1737	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	4f. – Define if this includes Weatherization or not, if it does UDMO tracks and CAN report this data	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1738	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	4g. – UDMO tracks and CAN report this data	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1739	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	Service Area: Health and Nutrition Services 5a. – UDMO tracks and CAN report this data 5b. – UDMO tracks and CAN report this data 5c. – UDMO tracks and CAN report this data 5d. – UDMO tracks and CAN report this data	Alternative Response	OCS appreciates this feedback and as with the current reporting structure, if a service is not offered, subrecipients should enter '0'.
1740	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	5e. – UDMO does not offer programming that provides this service 5f. – UDMO does not offer programming that provides this service 5g. – UDMO does not offer programming that provides this service 5h. – UDMO does not offer programming that provides this service	Alternative Response	OCS appreciates this feedback and as with the current reporting structure, if a service is not offered, subrecipients should enter '0'.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1741	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	5i. Define older adults, what age range? – UDMO does not offer programming that provides this service	Alternative Response	OCS appreciates this feedback and as with the current reporting structure, if a service is not offered, subrecipients should enter '0'. As noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1742	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	5j. – UDMO does not offer programming that provides this service	Alternative Response	OCS appreciates this feedback and as with the current reporting structure, if a service is not offered, subrecipients should enter '0'.
1743	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	5k. – UDMO tracks and CAN report this data 5l. – UDMO tracks and CAN report this data 5m. – UDMO tracks and CAN report this data	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1744	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	5n. – UDMO tracks and CAN report this data (Free Dental Clinic) 5o. – UDMO tracks and CAN report this data (HS/EHS, Free Dental Clinic)	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1745	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	5p. – UDMO does not offer programming that provides this service 5q. – UDMO does not offer programming that provides this service	Alternative Response	OCS appreciates this feedback and as with the current reporting structure, if a service is not offered, subrecipients should enter '0'.
1746	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	5r. – UDMO tracks and CAN report this data 5s. – UDMO tracks and CAN report this data	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1747	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	5t. – Suggestion to report number of Individuals accessing or receiving instead of the number of kits. UDMO tracks and CAN report this data regarding number of individuals	Alternative Response	OCS acknowledges this comment and emphasizes the unit of measurement across the report was expanded to collect more than just individual in cases where there are limitations tin ascertaining individual data. So this is meant to collect the unit not the individual.
1748	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	5u. – Suggestion to report number of Individuals accessing or receiving instead of the number ofdiapers/supplies. UDMO tracks and CAN report this data regarding number of individuals	Alternative Response	OCS acknowledges this comment and emphasizes the unit of measurement across the report was expanded to collect more than just individual in cases where there are limitations tin ascertaining individual data. So this is meant to collect the unit not the individual.
1749	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	5v. – Wording in this measure is confusing, “utilizing” (change to accessing)	Request Change Accepted	OCS appreciates this feedback and revised the subsequent reporting element (e.g., service, indicator, domain.
1750	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	5w. – UDMO tracks and CAN report this data	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1751	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	Service: Civic Engagement and Community Involvement Services Needs clarification. Is this section directed at community members or individuals who use community action services?	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1752	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	6a. – UDMO does not offer programming that provides this service at this time	Alternative Response	OCS appreciates this feedback and as with the current reporting structure, if a service is not offered, subrecipients should enter '0'.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1753	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	6b. – UDMO tracks and CAN report this data	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1754	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	6c. – UDMO tracks and CAN report this data, • Please include more examples to clarify if this is trainings, books, classes and what services are offered by individual States.	Alternative Response	OCS appreciates this feedback. As noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1755	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	6d. – Is this community members or consumers of community action services.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1756	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	Service: Transportation 7a. – UDMO tracks and CAN report this data	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1757	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	7b. – UDMO does not separate this from 7a. 7c. – UDMO does not separate this from 7a. 7d. – UDMO does not separate this from 7a. 7e. – UDMO does not separate this from 7a.	Alternative Response	OCS appreciates this feedback and as with the current reporting structure, if a service is not offered, subrecipients should enter '0'.
1758	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	UDMO currently does not report Module 4: Community Level FNPI	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1759	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	In conclusion, the Upper Des Moines Opportunity, Inc. CSBG and Administrative team's main concerns are: 1. The vagueness of some measures and recommends for items to be better clarified/defined to ensure proper tracking and reporting.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.
1760	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	2. The removal of some measures, will this lead to those key services being eliminated from allowable services to be supported by CSBG funding in the future.	Alternative Response	OCS acknowledges this comment and notes the flexibilities with the funding are not impacted by what is reported. The reporting schema provides a national summary of performance.
1761	Upper Des Moines Opportunity, Inc.	Upper Des Moines Opportunity, Inc.	Additional comments or feedback can be provided by UDMO staff, including: • Julie Edwards, Executive Director jedwards@udmo.com 712-859-3885 ext. 1025 • Alisa Schlief, Family and Community Services Director & Certified ROMA Trainer aschlief@udmo.com 515-576-7774 • Shakira Meye rDirector of Development, Compliance and Reporting smeyer@udmo.com 712-298-1447	No Change or Response Needed	No response required.
1762	David Hagen	Hawkeye Area Community Action Program, Inc.	Hi, I appreciate your willingness to review process and tools used to collect and aggregate performance outputs and outcomes from the Community Action Network regarding the Community Service Block Grant (CSBG). In this era of Big Data, the network should have the capacity to the tell the story of how CSBG funds can be leveraged forA.strengthening of communitiesB.addressing the needs of low-income people to support their economic securityC.developing innovative and effective community-based approaches to attack the conditions and causes of poverty, andD.engaging low-income populations through maximum participation	Alternative Response	OCS acknowledges this comment. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS understands there are nuances at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden does not preclude a local agency
1763	David Hagen	Hawkeye Area Community Action Program, Inc.	The majority of the non-profit Community Action Agencies (CAAs) that I have worked or worked for a grant- management organizations where CSBG funds are less than 5% of their annual budgets. The data burden that CAAs management regularly is not a result of the current CSBG Annual Report, but a result of virtually every federal, state, andlocal funding organization requirement to use a specific data system. Many of those systems used within the CAA network were developed last century and without data migration capacities. Data systems that do have the capacity for secure, data migration – like systems that utilize REST API structures –	Alternative Response	OCS acknowledges this comment and appreciates the feedback, the state systems are outside of our purview but OCS has invested in the CSBG Performance Management Website which provides a dynamic display of data submitted to the federal office.
1764	David Hagen	Hawkeye Area Community Action Program, Inc.	For the record, we rely on HUD- and VA-grants for homeless services. They are great partner and ally. We have an agency-level data systems that allows us to manage data tracking in those programs with little to no double data entry. The data burden at the CAA-level, then, is a function of the quality of data system(s) utilized by the local CAA. If you asked the CAAs that complained about the data burden of the current CSBG report before you started the plan to revise the annual report, I think you would have learned quickly that the CAAs in question probably do not have sufficient data system infrastructure. FYI, since we have a robust	Alternative Response	OCS is committed to incrementally changing the reporting structure to ensure grant recipients and subrecipients can calibrate these systems to adjust to these changes. Use of the Annual Report 3.0 will be optional in FY2026. Therefore, the first mandatory year for the updated reporting is not until the FY2027 CSBG Annual Report is due which is March 31, 2028. This would provide for additional time for OCS to develop the business rules and coding for systems (which we currently provide to grant recipients), update the Smart Forms, and provide needed technical

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1765	David Hagen	Hawkeye Area Community Action Program, Inc.	The re-ordering of Modules 3 and 4 really is a insubstantial change, which will not reduce the data burden. The four goals of the CSBG Act summarized earlier, will always require CAAs to perform Community Needs Assessment(CAN) and then plan, Implement, and evaluate family-level services and community-level strategies. Some CAAs may only do family-level services (the Module 4 of Version 2.0); other CAAs will do both types of work based upon the CNA, their CAA capacities, and the capacities of their partners. As a result, both community-level work (the current Module 3) and the family-level work (the current Module 4 of	Alternative Response	OCS acknowledges this comment and notes that Community Level Transformation is recommended but not required due to the content of submissions in previous years, indicating the need for increased technical assistance and also keep in mind there are a vast array of state and local agencies that may not have the capacity to carry out a transformation initiative based on their funding levels. OCS believes that with enhanced training and technical assistance once we have addressed data validity in the current reporting structure, we can work collectively to build capacity
1766	David Hagen	Hawkeye Area Community Action Program, Inc.	While on the topic of community-level reporting, Module 2, B.5 could be dropped from the reports. Just having a list of partners that is not linked to any type of family or community work really is a data burden. I would see value in having something like this list linked to the Community Initiative Status Forms (current Module 3) to help tell the story of the number and types of partners needed to plan, implement, and maintain a community-level, multi-year project.	Request Change Not Accepted	OCS appreciates this feedback. These remained as it provides an opportunity for local agencies to demonstrate the organization standards met.
1767	David Hagen	Hawkeye Area Community Action Program, Inc.	AS an agency, we have already used the NPIs of version 2.0 in the planning of our CSBG Application. Recall that GPRA of 1993 and the Modernization of GPRA 2010, outline they need for a planning process as part of the collection of performance measures. We already started using version 2.0 for FY2024 and FY2025, so, I will only review 3.0.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.
1768	David Hagen	Hawkeye Area Community Action Program, Inc.	Service count (SRV) performance metrics are simply outputs. I would like the option to add outputs that are not listed.	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an 'other' with requirement of description.
1769	David Hagen	Hawkeye Area Community Action Program, Inc.	Having a "Z" options like the FNPIs would be fantastic.	Request Change Accepted	OCS accepts this edit and has updated all FNPIs to include an 'other' with requirement of description.
1770	David Hagen	Hawkeye Area Community Action Program, Inc.	I fine with the addition of Concrete Supports (as they align with many would define as a proxy outcome). Given the growing research body toward this concept, this is an improvement.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1771	David Hagen	Hawkeye Area Community Action Program, Inc.	The four goals of the CSBG Act outlined at the top of this message truly require outcome performance metrics (or the FNPIs and CNPIS of the current CSBG Report Version 2.0) The relationship between service outputs and outcomes in not always a one-to-one relationship as proposed by the Service to Outcome Plan. A good example is Version 3.0's Transportation Domain (which needs to be added to the National Theory of Change if implemented). There are no list FNPIs with SRV 7a-e or the proposed Version 3.0. I would guess part of these reason for this is that transportation outputs can lean into outcomes across multiple domains. The list	Alternative Response	OCS acknowledges this comment and notes the service to outcome plan is a supplemental guide to demonstrate congruency and a logic model method between the investments in services to longer term outcomes to truly illustrate the performance of local agencies and their ability to help individuals achieve self-sufficiency. Concrete supports have traditionally been in the report but have not had a clear delineation into how they may be counted. Research in human and social services highlights the outcome of providing concrete supports lead to a better quality of life because
1772	David Hagen	Hawkeye Area Community Action Program, Inc.	In the pre-GPRA world of the 1980s, CAAs performance metrics often amounted to efficiency performance measures. Things like the # of applications evaluated within 30 days (in fact our State LiHEAP office still operates like its 1985). Efficiency performance metrics and outputs tell a story, but they are not able to tell us if a low-income family achieve economic security or if an innovative community-based approach reduced a condition or cause of poverty. The NPIs of the current CSBG Annual Report (Version 2.0) do that well. Many of the revised FNPIs replaced outcome language (that allows us to measure successes) with output language	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1773	David Hagen	Hawkeye Area Community Action Program, Inc.	NPI 2a Enrolling in childcare does not translate to being school ready or any type of age-appropriate development along any dimension: language, socioemotional, fine or gross motor, etc.)	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1774	David Hagen	Hawkeye Area Community Action Program, Inc.	NPI 2b youth being actively connected to an education program does not report on age appropriate skill- development.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1775	David Hagen	Hawkeye Area Community Action Program, Inc.	NPI 2e is the output metric for the outcome 2f. [2e should be eliminated]	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure of FNPIs with directional language (i.e., increase or decrease) to better capture change the impact of services.
1776	David Hagen	Hawkeye Area Community Action Program, Inc.	NPI 3a should not be the completion of a training, but obtaining measurable financial skills	Request Change Not Accepted	OCS appreciates this feedback and encourages the use of the FNPI Other category for additional outcomes.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1777	David Hagen	Hawkeye Area Community Action Program, Inc.	[NPI] 3b is the output; increasing wealth is the outcome.	Alternative Response	OCS acknowledges this comment. This indicator was updated to measure obtaining one or more asset. Adding the term wealth may increase concerns about data validity due to the subjectivity with the term wealth.
1778	David Hagen	Hawkeye Area Community Action Program, Inc.	NPI 4a HUD defines shelter and transitional housing (long term shelter) as variations of homelessness. Shelter should be a service count; not an outcome measure.	Request Change Not Accepted	OCS acknowledges this comment and notes this indicator was not revised in the proposed revision. Understanding the pathway to self-sufficiency may require obtaining safe temporary place before permanent housing is a critical measure as our goals are ultimately self-sufficiency. This is a measure reported on widely by local agencies and carries significant utility in understanding trends on the pathway to permanent and stable housing.
1779	David Hagen	Hawkeye Area Community Action Program, Inc.	[NPI] 4g is written as an output. Consider something like “The number of individuals who obtain or maintain safe, quality water service in their homes”	Request Change Accepted	OCS acknowledges this comment and appreciates this feedback. The FNPI that corresponds to weatherization has been updated to align with improved health and safety due to home improvements.
1780	David Hagen	Hawkeye Area Community Action Program, Inc.	All of the Health NPIs should be reviewed to clarify, which may be Concrete Supports. Otherwise, the revised language needs to assessed if it is output or outcome language.	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
1781	David Hagen	Hawkeye Area Community Action Program, Inc.	[NPI] 5e home visits should be a service count; the outcome is individuals that maintain independent living. (You may want to consider one outcome measure for seniors and another for people with disabling conditions)	Request Change Accepted	OCS acknowledges this comment and has added language to improve the structure with directional language (i.e., increase or decrease) to better capture change the impact of services.
1782	David Hagen	Hawkeye Area Community Action Program, Inc.	If oral health services are concrete supports (and hence a proxy outcome). I would think that a dental fluoride varnish could be a concrete support service (output) that translates to individuals who maintain appropriate oral or dental health.	Alternative Response	OCS acknowledges this comment and as noted in the listening session and Dear Colleague Letter, OCS will release a manual and expand training on the revised report to clearly define which services would be countable in an indicator. Similarly, the update collection adds illustrative language following indicators where there may be a general service.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1783	David Hagen	Hawkeye Area Community Action Program, Inc.	Seriously, the revised language here is a mess, and sets out reporting back instead of forward.	Alternative Response	OCS acknowledges this comment and emphasizes this exercise was primarily to examine the burden placed on the public through information collection. One critical element noted is the expansive nature of Community Action creates many variations for service delivery at the local level that are driven by local needs. This report captures elements that have common components across the nearly 1,000 agencies and 56 grant recipients the federal office collects information from. OCS offers three alternative opportunities to capture this information: 1. use the 'Other'
1784	David Hagen	Hawkeye Area Community Action Program, Inc.	I like the simplification of FNPI 6. I think that it should include “low-income individuals” to align with the goals of the CSBG Act.	Request Change Accepted	OCS acknowledges this comment and adopted this change. Please note the update was made with person-first language.
1785	David Hagen	Hawkeye Area Community Action Program, Inc.	I think the removal of FNPIs 7 in version 2.0 is a mistake. I understand that CAAs are challenged to report on the number of individuals who obtained one or more outcomes with an unduplicated count as it is a direct results of any CAA’s need to use multiple data systems that are either obsolete as they do not use current data migration technology and/or the controllers of mandatory data systems resist or prevent data migration efforts. That being said, this single FNPI is the only one where we begin to tell the story of the multitude of services needed across service domains to assist low- income people obtain economic security. The NPI 7 in	Alternative Response	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency
1786	David Hagen	Hawkeye Area Community Action Program, Inc.	5 Health. Should be “individuals with a disabling condition”	Request Change Not Accepted	OCS acknowledges this comment and used person first language where the term condition may not be inclusive of all categories of a disability.
1787	David Hagen	Hawkeye Area Community Action Program, Inc.	Health Insurance SourcesAny data system that reports this metric needs to allow for the fact that any person may have more than one of these.	Alternative Response	OCS acknowledges this comment and appreciates the feedback.
1788	David Hagen	Hawkeye Area Community Action Program, Inc.	6 RaceIt’s time for uniform classification:Are Asians not American? Why not Asian-American?	Request Change Not Accepted	OCS has updated the race and ethnicity categories to align with the White Office of Management and Budget directive (SPD-15) on race and ethnic categories for federal reporting.

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1789	David Hagen	Hawkeye Area Community Action Program, Inc.	6 RaceIt's time for uniform classification:Let's recognize our history. White or European-American	Request Change Not Accepted	OCS has updated the race and ethnicity categories to align with the White Office of Management and Budget directive (SPD-15) on race and ethnic categories for federal reporting.
1790	David Hagen	Hawkeye Area Community Action Program, Inc.	9 Household TypeSingle female parent and single male parent of version 2 allowed us to track community needs related to underserved populations (low-income, single dads often have access to fewer community services)	Alternative Response	OCS acknowledges this comment and combined to reduce the burden of having to extrapolate this at the local level. Not all local agencies have the ability to split this therefore OCS suggests retaining if necessary for local efforts, but will consolidate for national reporting.
1791	David Hagen	Hawkeye Area Community Action Program, Inc.	Note: data systems that report on 9a and 10a should be able to cross-check these two data points; many do not.	Alternative Response	OCS acknowledges this comment and appreciates the feedback.
1792	David Hagen	Hawkeye Area Community Action Program, Inc.	Except for medical insurance, the totals for characteristics 1 to 11 should equal unduplicated individuals. Some data systems cannot check this.	Alternative Response	OCS acknowledges this comment and appreciates the feedback.
1793	David Hagen	Hawkeye Area Community Action Program, Inc.	Characteristic 12's total should equal the unduplicated household count.	Alternative Response	OCS acknowledges this comment and will explore how the validations post-OMB approval may be restructured.
1794	David Hagen	Hawkeye Area Community Action Program, Inc.	I would like characteristics 13 Sources of household income, 14 Other income Sources, and 15 Non-cash benefits to remain as this data can be used to program planning, testing of innovative project concepts, the assessment of community needs and how well CAAs are bundling services. I assume that they have been complaints about data burden of these characteristic, which again is a direct reflection of no or substandard agency-level data systems. If you keep these three, then the association between them needs to be cross-checked.	Request Change Not Accepted	OCS acknowledges and appreciates this comment. With over 1,000 local agencies and 56 CSBG grant recipients, there is significant variation in the services provided across the network. At the federal level, we want to ensure we are only collecting data that is essential and that we will use. OCS understands that some data we have removed maybe beneficial to collect at the local level and emphasizes that the removal of the federal reporting requirement to minimize the collective burden of all grant recipients and subrecipients does not preclude a local agency

No.	Name of commentor	Organization	Comment	Final OCS change	Final OCS response
1795	David Hagen	Hawkeye Area Community Action Program, Inc.	There should be a total on 14 Other Income that is cross checked against the Other Income categories of 13 Sources of Household Income.	Alternative Response	OCS acknowledges this comment and will explore how the validations post-OMB approval may be restructured.
1796	David Hagen	Hawkeye Area Community Action Program, Inc.	The unduplicated count on Non-Cash Benefits in 13 should equate to an unduplicated household count for 15 Non-cash benefits.	Alternative Response	OCS acknowledges this comment and will explore how the validations post-OMB approval may be restructured.
1797	David Hagen	Hawkeye Area Community Action Program, Inc.	Lastly, as Community Action is about improving low-income communities, the lives of low-income people, and a CAAs capacity to leverage other community services, the demographic report should include a second Level of Household Incomes that reports HUD's Area Median Income (AMIs), which is the gold standard indicator for housing programs for low-income people in the USA.	Request Change Not Accepted	OCS acknowledges this feedback and highlights the statutory requirement for eligibility is that of the Federal Poverty Guidelines and any application state or territorial rulemaking, the changing of the eligibility would require a legislative change. OCS is also cognizant of not adding reporting burden for grant recipients and subgrant reicpients.
1798	David Hagen	Hawkeye Area Community Action Program, Inc.	And finally, there needs to be some thought about setting data standards for services for a single individual (like youth job shadowing services) and food assistance or rent assistance (that serve all people in the household). For example, if CAA #1 provides rent assistance for 100 families with 3 members and CAA #2 provides rent assistance for families with 5 members, then what should be reported:•300 and 500 individuals served for CAA #1 and CAA #2 respectively or•100 and 100 households.•OR both	Alternative Response	OCS appreciates this feedback. The guides and instructions post-OMB approval will adopt the recommendation to expound further.
1799	David Hagen	Hawkeye Area Community Action Program, Inc.	In summary, quality data standards for uniform reporting are critical.	No Change or Response Needed	OCS acknowledges this comment and appreciates the feedback.