

January 19, 2021

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

Dear ACF Reports Clearance Officer,

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

Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information has practical utility:

Pennsylvania agrees with NASCSPP that Modules 1-4 of the CSBG Annual Report is the proper vehicle to report critical information to OCS; however, asking states and agencies to submit separate reports for CARES and Disaster funding would undermine the foundational principles of CSBG and yield an inaccurate picture of impact of these dollars. While collecting information on CARES and Disaster impact is necessary, it is not necessary that it be collected through separate reports, which would pose a great administrative burden as well as a risk of significant inaccuracies, rendering the data of no practical utility. It is difficult to split outcomes which arise from two different funding streams because a single-family unit may be served from one program using regular CSBG funds and from CARES funding in another program.

Additionally, the proposed forms are missing key pieces of data that would be critical to telling the story of CARES and Disaster funding at the local level that could easily be collected through the regular Annual Report submission.

Reporting on a single funding stream:

CSBG might be a relatively small percentage of a local agency's funding, but it is the glue that binds the agency together and provides the Community Action identity and is vital to the function of many other agency programs. Since the inception of mandatory reporting in 2001, states and eligible entities have reported people served, services, and outcomes for all programs and funding

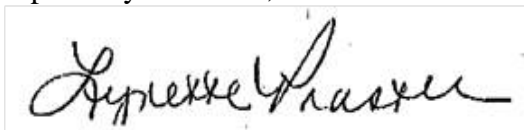
they administer because CSBG touches all customers and leverages additional funding sources to be able to offer robust services that achieve outcomes. Eligible entities have never connected a specific proportion of services, outcomes, and people to specific CSBG dollars, and it would not make sense to begin doing so for a supplemental. CSBG is not a program—CSBG is a strategy that supports, coordinates, and leverages all work of the entity. As such, OCS will not receive a complete picture of the impact of CARES and Disaster funding if they ask for reporting only on these funding streams in a report separate from all other state and agency level data.

Pennsylvania agrees with NASCSP's recommendation to include CARES and Disaster data in the regular Module 1 -4 CSBG reporting process and not collect the data separately. This would provide OCS with a complete picture of impact and reduce reporting burden.

The accuracy of the agency's estimate of the burden of the proposed collection of information:

In this time of a national crisis, local agencies and state offices are working overtime to try to keep systems running and provide crucial services to families and people. OCS has stressed the need to reduce administrative burden in order to focus on what is most critical: serving our communities made vulnerable because of the crises. Due to the priority of providing services to our families and a safe and expedient way given these circumstances, we think it is unnecessary to require states and agencies during these uncertain times to take on the additional burden of more reporting. Accurate reporting can be very challenging and CSBG is intended to report all combined Outcomes towards self-sufficiency which occur from the agencies work in multiple funding streams into a single accurate report. With the splitting of the CARES Funding into it's own separate report, this poses the added challenge of determining which program provided what Outcomes to a family that may be served using multiple funding streams (based on their enrolled programs. If CARES and Disaster reporting were reported in the regular report, however, it would not increase the reporting burden to this extent and would still enable OCS to collect information regarding CARES and Disaster.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lynette Praster", enclosed within a thin black rectangular border.

Lynette Praster, Director
Center for Community Services

Cc: File