



CALIFORNIA COMMUNITY ACTION PARTNERSHIP ASSOCIATION  
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January 19, 2020

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

Dear ACF Reports Clearance Officer,

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

It should first be noted that CalCAPA supports the Office of Community Services (OCS) in collecting quality data about the impact that both CSBG CARES and CSBG Disaster funding have in communities across the country. However, CalCAPA does have some concerns regarding the proposed reporting tools and process that will be outlined in this document. Our comments in this letter will address: the general approach to data collection, the CSBG model of service delivery and community transformation, as well as the burden estimate during the time of an ongoing pandemic.

CalCAPA believes that Modules 1-4 of the CSBG Annual Report is the proper vehicle to report critical information to OCS; however, asking California 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. 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. This data can simply be collected in conjunction with the current CSBG Annual Report for 2020 and 2021 and the data carefully evaluated to demonstrate the greater impact due to CARES and Disaster funding.

CSBG might be a relatively small percentage of a local agency's funding, but it is 100% of their identity. 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 dollars only, and it would erode the decades of work accomplished by the network if reporting was to make an about face on our network's culture of focusing on the systemic approach to overcoming poverty injustice.

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. The CSBG CARES and Disaster burden continues to push the many staffs to a maximum output while personnel also try to overcome their own families expanded needs.

CalCAPA appreciates the work of OCS to collect data on critical funding to be able to communicate the impact of CSBG. We also appreciate the ability to actively participate in this process on behalf of our members and through our current cooperative agreement, Regional Performance and Innovation Consortium, with the OCS. As a training and technical assistance provider and membership organization for CSBG providers in Region IX, CalCAPA continues to applaud and actively support the federal investment and national commitment to reducing poverty in our nation that the CSBG programs represent. We look forward to continuing to work with OCS to improve and strengthen the supplemental reporting process.

Sincerely,

A handwritten signature in cursive script that reads "David Knight".

David Knight, Executive Director  
Board of Directors

CalCAPA Member Agency sign-on:

Amador-Tuolumne Community Action Agency

A handwritten signature in cursive script that reads "Joseph Bors".

Calaveras-Mariposa Community Action Agency

California Human Development Corporation

Campesinos Unidos, Inc.

Center for Employment Training

Central Valley Opportunity Center

*Jorge De Nava Jr.*

City of Los Angeles Housing & Community Investment Department

City of Oakland, Human Services Department

Community Action Agency of Butte County, Inc.

*Thomas Tenorio*

Community Action Board of Santa Cruz County, Inc.

*Maria Elena De La Garza*

Community Action Commission of Santa Barbara County

Community Action Marin

*Chancha Alexandre*

Community Action of Napa Valley

*Shirley Johnson*

Community Action of Ventura County, Inc.

*Susana Lopez-Garcia*

Community Action Partnership of Kern

*Jeremy T. Tobias*

Community Action Partnership of Madera County

*Mattie Mendez*

Community Action Partnership of Orange County

*Gregory C. Scott*

Community Action Partnership of Riverside County

Community Action Partnership of San Bernardino County

*Patricia Nichols-Butler*

Community Action Partnership of San Luis Obispo County, Inc.

*Elizabeth Steinberg*

Community Action Partnership of Solano, JPA

Community Action Partnership of Sonoma County

*Susan Cooper*

Community Design Center

Community Services & Employment Training, Inc.

*Mary Alice Escarcega*

Contra Costa Employment & Human Services Department

County of Los Angeles Workforce Development, Aging & Community Services

County of Los Angeles Department of Public Social Services

County of San Diego, Health & Human Services Agency, Community Action Partnership

County of Yolo Health and Human Services Agency

*Nolan R. Sullivan*

Del Norte Senior Center

*CMazzei*

El Dorado County Health and Human Services Agency

Foothill Unity Center, Inc.

Fresno Economic Opportunities Commission

Glenn County Health and Human Services Agency

Inyo-Mono Advocates for Community Action, Inc.

*Robert W. Hyman*

Kings Community Action Organization Inc.

Long Beach Community Action Partnership

*Maria D.*

Merced County Community Action Agency

*Brenda Callahan Johnson*

Modoc-Siskiyou Community Action Agency

Monterey County Community Action Partnership

*Lauren C. Suwasupa*

Nevada County Department of Housing & Community Services

North Coast Opportunities, Inc.

Northern California Indian Development Council, Inc.

*Gregory W. Gehn*

Plumas County Community Development Commission

Project GO, Inc.

*Lynda J. Timbers*

Proteus, Inc.

Redwood Community Action Agency

*Val Martinez*

Rural Community Assistance Corporation

Sacramento Employment and Training Agency

Sacred Heart Community Service

San Benito County Health & Human Services Agency

San Joaquin County Department of Aging & Community Services

Shasta County Community Action Agency

*Jaclyn K Disney*

Tehama County Social Services

Urban Services, YMCA

*Evelyn Das-Ralakis*