



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,

On behalf of the seven North Dakota Community Action Agencies serving all 53 counties across our state, I 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). Our network has given this substantial consideration and feels strongly that the proposal will place an undue burden on our network resulting in a less accurate and less useful information; we encourage capturing the CSBG activities in their entirety via the already-existing CSBG Annual Report.

The proposed data collection approach is problematic in several ways:

1. It does not properly represent the intended and actual ways that CSBG funding is used by CAAs;
2. The reporting approach will unduly burden agencies during a global pandemic without adding useful data demonstrating the specific impact of the Disaster and CARES supplementals;
3. Data resulting from this approach will be open to easy and harmful misinterpretation that will adversely affect CAAs; and
4. The reporting approach does not provide sufficient data points to capture new, emerging services and outcomes across the CAA network. While imperfect, the existing Annual Report is the most practical vehicle to capture the breadth of CAA activities without unduly burdening them with new reporting concepts and the implications of multiple reports that will be misunderstood by governmental and network stakeholders.

In conclusion, we all share a focus on accountability and our seven agencies are accountable daily to their clients, communities, funding agencies, partner agencies, and Boards of Directors. It is essential that the impact of the CSBG work be measured and reported showcasing the impact of our work as we move individuals and families into the realm of Self-Sufficiency. However, we emphatically believe that the one comprehensive and already-existing Annual CSBG Report will suffice for these purposes; please do not impose further requirements on our network as we're in the throes of a global pandemic impacting us in unimaginable and unprecedented ways.

Sincerely,

Andrea Olson, MS, CCAP, NCRT/NCRI  
Executive Director