



State of California-Health and Human Services Agency
DEPARTMENT OF COMMUNITY SERVICES AND DEVELOPMENT
2389 Gateway Oaks Drive, Suite 100, Sacramento, CA 95833
Telephone: (916) 576-7109 | Fax: (916) 263-1406
www.csd.ca.gov



January 27, 2021

Administration for Children and Families
Office of Planning, Research, and Evaluation
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 Community Services Block Grant (CSBG) Annual Report (OMB No.: 0970-0492). The California Department of Community Services Development (CSD) offers several comments related to the proposed clearance package.

It should first be noted that CSD supports the effort of the Office of Community Services (OCS) to collect quality data in order to quantify the impacts of CSBG CARES and Disaster Supplemental funding in communities throughout California. After reviewing the proposed clearance package, CSD has some concerns and recommendations for the proposed reporting tools and process outlined below.

Reporting Systems

OCS proposes to establish separate reporting systems for CARES and Disaster Supplemental funding. CSD believes that the current reporting system for the CSBG Annual Report is the appropriate vehicle to report data in Modules 1 through 4 for CSBG CARES and Disaster Supplemental funding. California recommends one centralized reporting system for all CSBG funds and program activities, including, but not limited to: CARES, Disaster Supplemental, and regular CSBG. As such, mandating the use of separate reporting systems will undoubtedly place an additional burden on CSBG agencies and render an incomplete picture of outcomes resulting from such leveraging strategies.

Critical Information Missing

The proposed forms for CSBG CARES and Disaster Supplemental funding are missing key data elements. Specifically, the proposed forms do not ask for Module 2, Section B, Eligible Entity Capacity data. This Module and Section is where eligible entities typically provide critical information pertaining to volunteer hours and partners. The lack of reporting in this area fails to support the collection of information to support how CSBG agencies achieved capacity gains through volunteerism and leveraged strategic

partnerships to better service local communities, which are both considered significant activities and features of CSBG.

In addition, the proposed forms do not ask for outcomes achieved (only requests the number of people enrolled) in Module 4, Section A, Individual and Family National Performance Indicators. The outcome results of individuals and families in this section is crucial to demonstrate CSBG's outcome focus and gives us the ability to quantify service impacts. Nationally, there has been a concerted effort to increase focus on results, accountability, and ensuring the CSBG network is better positioned to demonstrate outcomes resulting from its program services and activities. The absence of collecting outcome results of individuals and families in this section undermines this effort and eliminates critical data points used to demonstrate the success of CSBG and the network of Community Action Agencies. Further, it should be noted that the reporting change to Module 4 does not align with management and accountability principals reflected within the Results Oriented Management and Accountability System (ROMA).

Reducing Administrative Burden

It is imperative that OCS consider the burden reporting changes will impose on local CSBG agencies and state grantees, especially during a time of national emergency where the CSBG infrastructure as a whole is being stretched thin to provide crucial services and maintain operations under very challenging circumstances. It is vital that appropriate measures be taken to not impose additional reporting burdens on CSBG agencies and state grantees, but rather to encourage the use of existing reporting systems to support CARES and Disaster Supplemental reporting.

Summary

CSD appreciates the opportunity to offer feedback during this comment period for the CSBG CARES and Disaster Supplemental funding reporting. CSD agrees with OCS that it is important that the activities and achievements of each CSBG grantee and subgrantee are reported as accurately and in the most efficient manner possible.

CSD looks forward to partnering with OCS to improve the collection and submission of annual report data.

Sincerely,

A handwritten signature in blue ink, appearing to read 'DS', with a long horizontal line extending to the right.

David Scribner
Acting Director