

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 Colorado Department of Local Affairs (DOLA), have several comments related to the proposed clearance package. In partnership with our state members and other CSBG National Partners, we have reviewed, considered, and discussed the changes to the CSBG Annual Report to identify opportunities for improvements.

DOLA 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, Module 2, capacity building, and Module 4 National Performance Indicators, as well as the burden estimate.

DOLA's comments are below.

**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:**

DOLA believes 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. 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 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 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.

It is DOLA'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.

***Missing data – Module 2:***

Both the CSBG CARES and Disaster proposed forms are not asking for data for Module 2, Section B, CSBG Eligible Entity Capacity. In this section eligible entities report on critical information such as volunteer hours

and partners. If OCS does not collect this data, then they will be without information on how CARES and Disaster funds have leveraged new community partners and increased agency capacity building through volunteerism—both significant activities that have occurred in CARES and Disaster.

#### ***Missing data – Module 4:***

The proposed forms do not ask the eligible entities to report on outcomes achieved in Module 4, Section A, Individual and Family National Performance Indicators. Outcomes achieved by individuals and families represent critical information that OCS needs to inform Congress on how community action programs are outcome focused and achieve results. The only data currently proposed to be collected in the CARES and Disaster forms in this section are the number of people who are enrolled in programs working towards an outcome, but not the number that actually achieved the outcome. This is not in line with our defined Results Oriented Management and Accountability (ROMA) principals that have been introduced and engrained in the network under IM 49<sup>1</sup> and further advanced by the Government Performance Results Modernization Act of 2010<sup>2</sup>. The increased focus on results and accountability has been further defined through ROMA Next Generation and the Annual Report<sup>3</sup>.

It is imperative that OCS collect outcome data supported by CARES and Disaster funding. This should be done through the regular Annual Report submission, rather than a separate report.

#### **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. The burden estimate for regular CSBG reporting between States and Eligible Entities in the proposed clearance package is 713,302 hours. The CSBG CARES and Disaster burden is an additional 528,226 hours. While we believe that this is accurate, we think it is unnecessary to require states and agencies during these uncertain times to take on the additional burden of more reporting. 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.

#### **The quality, utility, and clarity of the information to be collected:**

DOLA is concerned about the use of proportional analysis that is discussed in the instructions for Module 4 on the proposed forms. As mentioned earlier, proportional analysis undermines the foundational principles of CSBG as CSBG is not a standalone program, and the funding cannot be tied to a specific proportion of services, outcomes, and people served. As such, proportional analysis would produce severe undercounting of impact in the context of CSBG. The quality and clarity of the data will be highly circumspect as any figures reported via proportional analysis would be an estimate, and furthermore, cannot be applied across the network in a standardized way.

#### **Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology:**

First and foremost, burden could be minimized by collecting both CARES and Disaster data through Modules 1-4 of the regular CSBG Annual Report instead of asking states and entities to provide a separate report.

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<sup>1</sup> “CSBG IM #49 Program Challenges, Responsibilities and Strategies, FY 2001-2003”. Office of Community Services. February 21, 2001. <https://www.acf.hhs.gov/ocs/policy-guidance/csbg-im-49-program-challenges-responsibilities-and-strategies-fy-2001-2003>

<sup>2</sup> “Public Law 111-352: GPRA Modernization Act of 2010.” (124 STAT. 3866; Date: 1/4/2011). Text from: United States Public Laws. Available from: LexisNexis® Congressional; Accessed: 1/12/21.

<sup>3</sup> “CSBG IM #52 Annual Report.” Office of Community Services. January 19, 2017. <https://www.acf.hhs.gov/ocs/policy-guidance/csbg-im-152-annual-report>

Below are specific recommendations for adapting the regular CSBG Annual Report to collect data for CARES and Disaster funding (instead of mandating separate reports).

Module 2 Adaptation:

- Add an expenditure chart for each supplemental fund to Section A.
- Keep Section B.
- Add a CARES and Disaster data point to Section C, C.2 "Amount of FYX CSBG allocated to reporting entity".
- Add a CARES column to Section C, C.3 "Federal Resources Allocated".
- Expand Section A, A.4.1 and identify this as a place where agencies can provide a narrative on how they used CSBG to alter their offices for touchless services, purchase of PPE, remote workstations, etc.

Module 4 Adaptation:

- Add the following services to Section C: Cash Assistance, PPE, and ten rows for "Other Services" to be written in by the local agency in order to provide flexibility in reporting services that are specific to COVID related issues.
- Add a service count section to Section B for the following services: boxes of food, pounds of food, hygiene kits, referrals and amount of housing (rent or mortgage) payments.
- Remove reference to myRA in SRV 3n.

**Conclusion**

DOLA 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 state members and through our current cooperative agreement, CSBG Performance Management Technical Assistance for the CSBG Program, with the OCS. DOLA continues to applaud and actively support the federal investment and national commitment to reducing poverty in our nation that the CSBG and weatherization programs represent. We look forward to continuing to work with OCS to improve and strengthen the supplemental reporting process.

Sincerely,



Audrey Field, Financial Assistance Manager  
Colorado Department of Local Affairs



Alex Vercio, Program Manager  
Colorado Department of Local Affairs