



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). At Minnesota Community Action Partnership (MinnCAP), we support 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, MinnCAP does have three concerns regarding the proposed reporting tools and processes that will be outlined in this document.

**Issues for our agencies reporting on a single funding stream:**

The proposed CSBG Cares/ Disaster report asks for only the number of customers served with CSBG CARES dollars and does not provide space for MinnCAP agencies to highlight new programs and services they have provided throughout the pandemic. We are concerned that not being able to provide additional details in the separate CSBG CARES/ Disaster report will show a limited picture of the impact our agencies have had in their local communities. MinnCAP agencies have responded quickly and nimbly to the needs in their communities, serving more clients across the state with new and innovative programs. To see the full picture of our agencies' impact, MinnCAP recommends CARES and Disaster data are included in the regular Module 1-4 CSBG reporting process and not collected separately. The existing Annual Report has questions that can more accurately show the full scope of work our agencies have done throughout the pandemic, providing OCS with a more complete picture of the impact agencies have had during COVID-19 and beyond.

**Administrative burden to MinnCAP Agencies:**

For almost a year, MinnCAP agency staff have been working overtime to meet the growing needs of their local communities, and the burden of their work to mitigate the health and economic crises caused by COVID\_19 will not dissipate any time soon. Although some of our agencies have been tracking CSBG CARES outcomes separately from other funding streams, many have not. The administrative burden on staff to have to retrospectively clean and analyze the CSBG CARES funding during a global pandemic would be an undue burden. Having agencies instead submit the data in existing Annual Report (Modules 2-4) could illustrate an increase in

total activities from a previous year to years where CSBG CARES dollars are expended, showing the impact of these dollars on the agency outcomes as a whole.

**Underestimation of the impact of CSBG and CSBG CARES/ Disaster:**

Because agencies use CSBG funds to leverage additional funding and often blend it with other funding streams, data from separate CSBG reports would not accurately reflect this practice. Although CSBG is often a relatively small percentage of local agency funding, it is 100% of their identity. That identity is an essential tool for agencies to leverage additional funding from state, local and private funders. CSBG CARES/ Disaster funding in particular has helped agencies leverage significant additional dollars to provide assistance during COVID-19. Separate reporting could lead people to significantly underestimate the impact of CARES/Disaster funding, which could cause harm to stakeholders' understanding of CSBG's effectiveness.

In summary, MinnCAP believes the easiest ways to mitigate these three concerns is to allow agencies to continue reporting on all of their activities, including those done using CSBG CARES/ Disaster funding, in one comprehensive Annual Report. By having the one report, OCS and key stakeholders will see the full impact local agencies have had in their communities during the pandemic, including how they have leveraged additional funding and through new and innovative programs they have participated in or created to meet the ever-changing and growing needs on the ground. Our agencies have worked tirelessly during the pandemic, and we believe having one Annual Report will showcase the full picture of all the outstanding work they have done.

Thank you for the opportunity to comment.

Sincerely,

Bill Grant

*Executive Director, Minnesota Community Action Partnership*