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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 National Community Action Partnership and 1,000+ local community action agencies and state associations we represent, I would like to 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 have given the proposed changes serious consideration with the input of our network and we have serious concerns about the impact of these proposed changes on CAAs across the country as well as the quality of the data that would be collected. We have provided responses to the specific areas of feedback that have been requested:

1. *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:*

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 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.

- **This proposed reporting approach is a significant and inappropriate departure from previous CSBG reporting**

CSBG is not a standalone program; it is core funding for all CAAs that is designed to be flexible and used to leverage additional resources. As a result, CSBG's impact must be measured in the context of all agency activities. The current Annual Report format recognizes this, requiring CAAs to report all agency activities and outcomes, regardless of how CSBG funds have been used. Requiring separate reports for CSBG Disaster Supplemental and CSBG CARES Supplemental departs from this practice. These supplemental funds are **not** standalone projects; they are additional CSBG funds to be leveraged in the same ways as the base CSBG allocation.

Recommendation -- The existing Annual Report captures all CAA resources (Module 2) and the resulting family-level and community-level outcomes

(Modules 3 and 4). While these Modules do not fully capture the breadth of agency activities, we feel this report, in comparison to past year reports, can provide the data needed to discern additional families, service and outcomes that resulted from the supplemental resources. This is the most practical and effective approach to understanding the impact of the supplemental resources.

- **This proposed reporting approach will unduly burden agencies during a global pandemic without adding useful data demonstrating the *specific* impact of the Disaster and CARES supplementals.**

For several months, local CAAs have been significantly impacted by the pandemic: their staff suffer the same challenges of the broader population, but they are also acting as first responders to support families in crisis. Although some CAAs have implemented efforts to track CARES outcomes separately from other funding, those data practices vary across agencies, and in many were not feasible. It would be an undue burden to have CAA staff retrospectively collect, analyze and “clean” data for a separate report. Additionally, the data themselves would not be useful because there are countless examples of outcomes that resulted from significant leveraging of CARES/disaster funds. In other words, many outcomes may not have happened without the availability of CARES/disaster funds, but the actual amount of those funds may have been small relative to total program expenses.

Recommendation – Again, the existing Annual Report captures all CAA resources (Module 2) and the resulting family-level and community-level outcomes (Modules 3 and 4). The best approximation of the marginal impact of CARES/Disaster funding would be the comparison of an agency’s total activities from a prior year (FY2019, for example) to an agency’s total activities from a year in which funds were expended (FY2020). A single, comprehensive Annual Report is the most practical, least burdensome approach.

- **This proposed reporting approach will produce data open to easy and harmful misinterpretation that will adversely affect CAAs.**

Because CSBG funds are designed to be leveraged to braid and blend with other sources of support, the data from separate CSBG reports would not accurately reflect this practice. For example, CSBG provides the core funding for many CAAs. They are able to use that identity to attract additional funding from state, local and private funders. If not for CSBG, those additional funds would likely not result. Accordingly, the activities/outcomes from those funds would not occur. Separate reporting would lead unsuspecting consumers of those reports to believe that CSBG translates into activities and outcomes dollar-for-dollar. Comparing those reports to other CSBG reports or to reports from other funding streams would significantly *underestimate* the impact of CSBG and cause irreparable harm to stakeholders’ understanding of CSBG’s effectiveness.

Recommendation – Again, the existing Annual Report is the only existing report that captures the totality of CSBG-related activities. Departing from this report through additional reports will create multiple reports that decision-makers will falsely compare with one another, to the detriment of the true story of CSBG’s effectiveness.

- **This proposed reporting approach does not provide sufficient data points to capture new, emerging services and outcomes across the CAA network.**

A final, but significant concern about the proposed approach is that it does not effectively capture the totality of services/outcomes or important capacity-building measures that allowed CAAs to remain in service. Specifically:

- The proposed supplemental reports only ask for number of customers served, not the number achieving specific outcomes
- The proposed supplemental reports do not provide additional/new services/outcomes that CAAs may have provided. In many cases – though not all – these new services/outcomes can be added using the existing Annual Report framework.
- Many CAAs were able to use supplemental funds to provide critical infrastructure (physical space, telecommunications, technology, etc) that allowed them to continue operations. The proposed additional reports do not provide additional value to CAAs in being able to report on these activities.

Recommendation – Again, the existing Annual Report is the only existing report that captures the totality of CSBG-related activities. It does not address some of the challenges described above, but it also does not add the additional burden of additional reports that add no additional value.

2. *The accuracy of the agency's estimate of the burden of the proposed collection of information:*

Federal partners, including OCS, have repeatedly stressed the need to *reduce administrative burden* on the network in the midst of the twin stressors of the pandemic and the economic crisis it has created. Additional reporting would not only require CAA staff to retrospectively collect, analyze, and “clean” data, they would also need to have those staff engage in several hours of training and technical assistance to be able to provide the requested data of the additional reports. Minimal burden would involve CAAs using familiar report formats and existing data collection procedures – which, in many CAAs, are already significantly time-intensive.

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

As addressed in several ways previously, there are significant concerns around the interpretation of data resulting from this collection approach. More specifically, the **proportional analysis** approach is not only substantively flawed (because it cannot accurately capture the leveraging impact of CSBG funds), it would also require significant training and technical assistance across the network to implement. It is simply impractical and ineffective to have CAA staff learn a data reporting technique that will ultimately fail to accurately report their efforts.

4. *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:*

The National Community Action Partnership supports the following recommendations jointly developed by NCAP, NASCSP and the CSBG Data Task Force:

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.

In summary, the National Community Action Partnership and the State Community Action Association and local CAAs who are co-signing this letter agree that the proposed reporting approach is an undue burden that will actually yield less accurate and useful information than the existing Annual Report. We all share a strong common interest in accountability. Every day our agencies are directly accountable to their communities through their work with families and local partners. It is critical that our network continue to capture the entirety of CSBG's impact and the countless ways it is leveraged at the local level to achieve its purpose of securing and supporting American families. We strongly believe the best path forward, in these circumstances, is to continue reporting on all of our activities in one comprehensive CSBG Annual Report.

Sincerely,



Denise Harlow
Community Action Partnership

Additional Signatories:

Community Action Partnership of Mercer County, Sharon, PA
Northeast SD Community Action Program dba GROW, SD
Rural Alaska Community Action Program, Anchorage, AK
Virginia Community Action Partnership, VA
Lebanon County Community Action Partnership, Lebanon, PA
West Central Wisconsin Community Action Agency, Inc., WI
Pittsburgh Community Services, Inc., Pittsburgh, PA
Community Action Partnership of San Luis Obispo County, Inc., CA
Community Action Marin, San Rafael, CA
KCEOC Community Action Partnership, Barbourville, KY
Tompkins Community Action, Inc., Ithaca, NY
United Community Corporation, Newark, NJ
Ohio Association of Community Action Agencies, Columbus, OH
Connecticut Association of Community Action (CAFCA), CT
Colorado Community Action Association, CO
New Jersey Association on Correction, NJ
Community Action Partnership of Utah, UT
Tri-Valley Opportunity Council in Crookston, MN
Georgia Community Action Association, Inc., GA
Jewish Renaissance Foundation, Community Action Agency, Perth Amboy, NJ
Schenectady Community Action Program, Inc., Schenectady, NY
The Agricultural and Labor Program, Inc., Lake Alfred, FL
Westchester Community Opportunity Program, Inc (WestCOP), NY
New York State Community Action Association (NYSCAA), NY
Kansas Housing Resources Corporation, KS
Community Action Planning Council of Jefferson County, Inc., Jefferson County, NY
Albany Community Action Partnership (ACAP), Albany NY
Community Action Kentucky, Frankfort, KY
Delaware Opportunities, Delaware County, NY
LifeWorks Community Action, Saratoga County, NY

Embarras River Basin Agency, Inc., Greenup, IL
Minnesota Community Action Partnership (MinnCAP), MN
NEK-CAP, Inc.; Northeast & North Central Region, KS
Community Action for Improvement, Inc. (CAFI), LaGrange, GA
Okanogan County Community Action Council, Okanogan, WA
California Community Action Partnership Association (CalCAPA), Sacramento, CA
Northeast Iowa Community Action Corporation, Decorah, IA
Northern Tier Community Action Corp., Emporium, PA
Kansas Association of Community Action Agencies (KACAP), Topeka, KS
Greater East Texas Community Action Program; Regional Base, Nacogdoches, TX
Blueprints – Pennsylvania, Washington and Greene Counties, PA
Central Piedmont Community Action, Inc., Siler City, NC
Cortland County Community Action Program, Inc. (CAPCO), Cortland, NY
Cattaraugus Community Action, Inc. (dba Connecting Communities in Action), Cattaraugus County, NY
Mohawk Valley Community Action Agency, Inc. (MVCAA), Utica, NY
Schoharie County Community Action Program, Inc., Schoharie County, NY
Community Action Partnership of North Dakota, Fargo, ND
Community Action Partnership for Dutchess County, Inc., Dutchess County, NY
Pro Action of Steuben and Yates, Inc., NY
East Central Kansas Economic Opportunity Corporation (ECKAN), KS
Central Susquehanna Opportunities, Inc. "A Community Action Agency", Shamokin, PA
EnAct Community Action Agency, Charleston, WV
Tri County Community Action - Cumberland, Dauphin, and Perry Counties, PA
Bucks County Opportunity Council, Bucks County, PA
Schuylkill Community Action- Schuylkill County, PA
Tioga Opportunities, Inc., Owego, NY
Alger-Marquette Community Action, Marquette, MI
Community Action Partnership of Hennepin County, Hennepin County, MN
Community Action Partnership New Jersey, Inc., NJ
Mississippi Association of Community Action Agencies, MS
L.E.A.P., Washington County, NY
Mountain CAP of West Virginia, Inc., a CDC, WV
Greater Erie Community Action Committee, Erie, PA