

June 21, 2024

Dr. Lanique Howard  
U.S. Department of Health & Human Services  
Administration for Children & Families  
Office of Community Services

RE: Request for Public Comments to Changes in CSBG Annual Report Requirements

Dear Dr. Howard,

Thank you for the opportunity to provide comment on the proposed revisions to the CSBG Annual Report. ABCD was one of the first Community Action Agencies in the nation and it is deeply committed to its status as a Community Action Agency within the CSBG network. ABCD serves approximately 100,000 individuals and families each year through approximately 75 different programs. ABCD takes its reporting requirements seriously and thus reviewed the proposed revisions to the annual report in great detail. ABCD kindly asks that you move forward with CSBG Annual Report 2.1 and put on hold CSBG Annual Report 3.0 until you seek further feedback from the Community Action Agency network. At this time, proposed CSBG Annual Report 3.0 would require complex and significant changes to existing data collection systems that would be burdensome and costly for Community Action Agencies to implement.

Specifically, ABCD highlights the following concerns for CSBG Annual Report 3.0:

1. The revisions outlined in Module 3, Section A: Individual and Family Services will negatively impact the quality and clarity of the data in the report. The proposed reporting standards call for mixed units of measurement. Some indicators call for the number of individuals served, some call for the number of goods provided (e.g. diapers) and some call for the specific number of individuals served in identified demographic categories. This revision would require an overhaul in the way that ABCD and most Community Action Agencies track and report data because, for example, most Community Action Agencies are not tracking the number of goods provided (e.g. 44 diapers) but rather are tracking the service (e.g. provision of an essential good, diapers) provided to an individual or family.

Further, the removal of some service options and the merging of others in the module will result in underreporting and thus underrepresentation of the scope of services provided by ABCD.

2. The revisions outlined in Module 3, Section B: Individual and Family NPIs will negatively impact the quality and impact of the data in the report. The removal of the “z” FNPIs will result in underreporting of outcomes achieved by ABCD’s community members and the entire Massachusetts Community Action Agency network. In Massachusetts, a statewide CSBG data working group was created in response to transition to ROMA Next Generation, tasked with developing a common listing of “z” FNPI indicators for all Massachusetts Community Action Agencies to utilize. The goal being two-fold, to enable Massachusetts Community Action Agencies to report on outcomes not found in the listing of the National FNPIs in order to better capture the full scope of work provided and to standardize reporting for the “z” FNPIs to allow for aggregation statewide. With the removal of the “z” FNPI indicator, Massachusetts Community Action Agencies will be unable to report on some of the innovative services that are provided which are not listed in the list of services outlined by OCS. Further, we are concerned that the removal of the “z” FNPI indicator will stifle the creative implementation of innovative programming moving forward, since there will be no pathway to report it.
3. ABCD is committed to working with OCS and the Community Action Agency network to ensure that the full impact of services provided by Community Action Agencies is accurately reported. This data collection is critical to demonstrating that Community Action Agencies are persistently fulfilling the CSBG Act’s mission to alleviate the causes and conditions of poverty in under-resourced communities. ABCD is concerned that the revision to Module 2, Section A.2 which eliminates the services supporting multiple domains will result in underreporting of services provided by Community Action Agencies. This domain allows ABCD to report on the number of individuals who receive case management, eligibility determinations and information and referral services, a critical component of ABCD’s provision of CSBG services. Eliminating it will result in undercounting the services that ABCD provides to its clients. ABCD, like all Community Action Agencies, is dedicated to meeting individuals and families in-need in the community where they are and providing them with a full array of services, consistent with the flexibility permitted by the CSBG Act. ABCD wants to ensure that this data is accurately reported, so that Congress and the public are aware of the full impact of CSBG funding.

Additionally, ABCD is concerned that the elimination of the services supporting multiple domains will impact the accuracy of Module 2, Section A: CSBG Expenditures by CSBG Eligible Entity and will potentially limit ABCD’s ability to allocate CSBG funds to information and referral services. This may result in masking the true and comprehensive use of the funds by ABCD and the entire Community Action Agency network. The ability to tie a service provision to an Expenditure Domain in the Annual Report is

critical—ABCD reported 6,786 services supporting multiple domains in 7C referrals in FFY23. ABCD reiterates that it is of critical importance that this data is reported in order to establish the true reach of CSBG funding in serving those in all communities in need.

4. The revisions outlined in Module 3, Section C: The All Characteristics Report, sub-section D: Household Level Characteristics will not reduce the data collection burden for ABCD. In order to determine income eligibility for CSBG funded programs as well other programs administered by ABCD such as Head Start and LIHEAP, ABCD would still need to collect sources of household income. Additionally, Module 3, Section C sub-section 12, Level of Household Income is still a required reportable field. It is necessary to collect sources of household income in order to calculate levels of household income.
5. The removal of CSBG Annual Report 2.0 Module 4, Section C: The All Characteristics Report Sub-Section E: the Number of Individuals or Who May or May Not be Included in the Totals Above & CSBG Annual Report 2.0 Module 4, Section C: The All Characteristics Report Sub-Section F: the Number of Households Who May or May Not be Included in the Totals Above will result in an underreporting of clients served. ABCD reported nearly 22,000 individuals in the FFY23 CSBG Annual Report under Module 4, Section C, sub-section E. ABCD is unable to de-duplicate clients served in some programs provided by ABCD's Housing and Homeless Prevention Department, Health Services Department, Climate Equity & Impact Department as well as subgrantee receipts due to data integration barriers.
6. The proposed staggered implementation in 2025 and 2026 is concerning because, if a state (or states) elect to require the implementation of the Annual Report 3.0 in 2025, it will result in inconsistent data collection across the nation. Thus, if Annual Report 3.0 is implemented, we recommend implementation, at the earliest, in 2026.
7. The proposed revisions to the CSBG Annual Report 3.0 do not establish a single national reporting standard. As OCS acknowledged in its listening sessions, states may ask agencies to report on data beyond what is requested by OCS. Thus, it is unlikely that this version of the annual report will result in any decreased reporting burden for Community Action Agencies.
8. The proposed revisions do not fully and accurately measure all of the outcomes of the services provided. In order to have a more comprehensive picture, OCS may consider having a long and short version of the annual reporting requirements, and have the short version due on a regular basis, which reports solely on number of unduplicated clients and demographics and provides as attachments any programmatic HHS reports that are

applicable (e.g. Head Start, LIHEAP) and a long version due every 3 to 5 years that is more comprehensive and aligns more closely with proposed Annual Report 3.0.

We applaud the efforts and goal of the proposed revisions and appreciate the opportunity to comment. We hope that these will be considered and Community Action Agencies may engage in further dialogue prior to the implementation of Annual Report 3.0. We are happy to meet to provide context and details on the implementation of the reporting requirements from a Community Action Agency perspective. We look forward to hearing from you.

Thank you,

*Sharon Scott-Chandler*

Sharon Scott-Chandler

President/CEO

Action for Boston Community Development, Inc.