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lives, embodies the spirit of hope,
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America a better place to live. We
care about the entire community, and
we are dedicated to helping people
help themselves and each other.

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Response to Community Services Block Grant (CSBG) Annual Progress Report, OMB #0970-0492

On behalf of the California Community Action Partnership Association (CalCAPA), I am writing to formally offer comments on the proposed changes to the Community Services Block Grant (CSBG) Annual Progress Report OMB #0970-0492.

CalCAPA exists to support Community Action Agencies and CSBG Eligible Entities (EEs) to strengthen communities and support a unified Community Action presence in California. Sixty agencies across California's fifty-eight counties strive to create opportunities to overcome the causes and conditions of poverty and help communities and families of low-income reach self-sustainability. CalCAPA is responding to proposed changes in the Community Services Block Grant (CSBG) Annual Progress Report posted to the Federal Register in Volume 89, No. 78, Office of Management and Budget (OMB) #0970-0492, pages 29339-29340 on April 22, 2024.

CalCAPA appreciates the opportunity to provide feedback on the proposed changes to the CSBG Annual Report. We commend OCS for its commitment to reducing the reporting burden and enhancing the quality of data collected. However, we believe further refinement is necessary to ensure alignment with the core purposes of the CSBG Act and the realities of the Community Action Network.

First, CalCAPA asserts that including the network in outcome tracking development can greatly enhance the effectiveness and efficiency of the process. By establishing and including a network of stakeholders, such as CSBG Executive Directors, program managers, data analysts, and Community Action Associations, it becomes possible to analyze processes, then promote changes in the collecting and sharing of data more seamlessly. Additionally, a network with sixty years of experience can facilitate collaboration and knowledge-sharing, leading to improved learning and innovation in outcome tracking. Incorporating the Community Action Network into outcome tracking development could have led to more accurate, timely, and impactful results. Instead, the

Office of Community Services chose not to openly communicate their desire to adapt outcome tracking and chose an outside entity without direct CSBG experience.

The proposed changes in Version 3.0 significantly compromise the quality of the CSBG Annual Report on several fronts. As previously described, the CSBG Annual Report serves as a crucial

tool in detailing how CAAs strategically allocate those resources to reduce poverty, revitalize low-income communities, and empower low-income families and individuals in rural and urban areas to become fully self-sufficient. As detailed below, OCS's proposed elimination of numerous data points results in the report losing its capacity to comprehensively convey the diverse and nuanced approaches CAAs deploy to meet these localized needs. This diminishes the report's effectiveness in accurately reflecting the impactful and diverse work of CAAs nationwide. While reducing burden is essential, it cannot come at the cost of report quality and its alignment with the CSBG statutory purpose.

Direct comments on proposed Annual Report 3.0 include:

Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies.

The original intent of Community Action, as defined by the Economic Opportunity Act (Title II, Part A, Section 201), is to provide stimulation and incentive for both urban and rural communities to mobilize their resources to combat the root causes of poverty. The Act specifies that Community Action Agencies should provide services, assistance, and other activities of sufficient scope and size to promise progress toward the elimination of poverty or its causes (Section 202). While Module 2 of the new report adequately provides the opportunity for organizations to report leveraged resources, the limited selection of FNPIs and the use of outputs as outcomes will not adequately communicate the Network's impact on the root causes of poverty.

A CalCAPA CSBG EE member ran a comparison spreadsheet using the new Indicator Disposition Report and created a crossroad to their current CSBG annual report because they wanted to know "what will change for them" for reporting. This agency will go from reporting 26 FNPIs to 10 FNPIs, from 27 SRVs to 12 SRVs, and from 157 CCRs to 112 CCRs. For them alone, it's a big change not being able to fit some of their programs, including outcomes like the 90 and 180-day for both employment and housing. They are not alone in our survey of the California CSBG EEs whose measured outcomes will be negatively impacted.

In the realm of goal achievement and productivity, there is a popular saying: "What gets measured gets done." This simple yet profound statement highlights the powerful impact of measurement on our ability to accomplish tasks and reach our desired outcomes. The act of measurement brings several benefits. Primarily, it provides clarity and focus. When we have a clear understanding of what needs to be accomplished and how to measure it, we can direct our energy and resources effectively. Measurement acts as a guiding compass, showing us the path to success and enabling us to stay on track. Additionally, measurement allows us to identify areas for improvement. By tracking specific metrics, we can identify bottlenecks, inefficiencies, or areas where we may be falling short. This insight empowers us to make informed decisions and take corrective actions to enhance our performance. CSBG has long functioned as the beacon of poverty outcome development and research. While many other poverty programs lack dollars for capacity to research, CSBG has allowed that space. Limiting tools to simply measuring outputs does not continue the path of giving the opportunity to track and therefore measure successful change. Without measurement, it becomes challenging to clearly show how the federal investment of CSBG allows agencies to identify areas of improvement and demonstrate when they overcome stagnation or complacency.

Similarly, 42 USC 9908 (b)(1)(A) mandates that CSBG funds be used to remove obstacles to self-sufficiency, secure and retain meaningful employment, attain adequate education, and obtain and maintain adequate housing, among other objectives. Thus, it would be expected that the revised report would include detailed indicators for each of these areas to comply with federal mandates and to illustrate the comprehensive impact of Community Action. It is our opinion that a number of these critical reporting elements have been removed from the current document, which in turn removes our ability to show accountability. When we have a standard against which we can measure our progress, we become more accountable to ourselves and to others, instilled with a sense of responsibility and urgency to act and deliver results. Community Action does this and should be able to continue telling this story of accountability. This accountability helps to drive productivity, as leaders and agencies strive to meet or exceed the established metrics. CSBG has not been, and never should be, simply about tracking CSBG dollars to outputs but rather what the local communities, CAA Board of Directors and their agencies are able to achieve within the whole process.

Furthermore, it is concerning that basic ROMA principles were not utilized for the development of this report. While statements made in the listening session suggest that analytics were used, there was a significant question regarding expertise from within the Network being adequately leveraged to develop a strategy for identifying essential reporting elements that aligned with the Network's goals. It is acknowledged that external perspectives can be valuable for forward momentum; however, as previously mentioned, harnessing the vast experience and expertise of those within the Community Action Network is vital for crafting a report that accurately reflects and supports the

Network's objectives.

A critical aspect, highlighted in Module 4 of the Introduction to ROMA Training, emphasizes that "National Performance Indicators are a selective sampling of what we do, and reflect only a portion of our work and accomplishments." It underscores the expectation that Community Action Agencies report annually on their full range of outcomes, in addition to the required standard set of national indicators. Importantly, the training module suggests flexibility for agencies to include additional indicators that capture the entirety of their impact, fostering innovation by allowing agencies to demonstrate unique or emerging outcomes. The new proposed report format, however, lacks designated areas to report these additional outcomes, potentially stifling innovation within the Network by restricting agencies to a predefined set of indicators that may not fully encapsulate their diverse impacts.

The current draft predominantly uses terms that emphasize outputs rather than outcomes, which may not fully convey the effectiveness of the services provided. For instance, terms like "enrolled" in FNPI 2a and 2e, "connected" in FNPI 2b, "completing training" in FNPI 3a, "served" in FNPI 4f, 4g, and 5a, and "receiving services" in FNPI 5c, 5d, 5e, 5f, 5g, 5h, and 5i, focus primarily on the activities themselves rather than the actual impact on participants' lives. To truly reflect the transformative effects of Community Action Programs and adhere to ROMA principles, these indicators should be revised to reflect outcomes such as increased employment rates, improved living conditions, enhanced skill sets, and better access to critical services. This shift from documenting mere participation to measuring tangible benefits would better align with ROMA's outcomes-oriented framework and enhance the report's utility in demonstrating the real value and effectiveness of Community Action Programs to stakeholders, including Congress.

To maintain alignment with performance management principles, all activities of the Network should be provided to address a specific problem. The removal of this problem is measured using an outcome. Some of the new services do not include outcomes, which contrasts with any performance management principles and practices.

The quality and clarity of the information to be collected.

Module 2 Recommendations

Report Field A.1.

The new format introduced in the CSBG Annual Report, which breaks down CSBG allocation expenditures into regular allocation, carryover, discretionary, and discretionary carryover, is a commendable improvement. This categorization is crucial as it addresses a common reporting issue where organizations previously struggled to accurately account for different types of funding. However, we recommend a minor yet significant

clarification in terminology: the term "allocation" could be misleading, as it might be interpreted by agencies as referring to the total funds allocated rather than the portion that was expended.

Section A.2,

CalCAPA does not agree with the removal of the option to report expenditures supporting multiple domains. Much of CSBG funding supports first-line management, clerical, janitorial and maintenance staff, building maintenance, utilities, and other common costs. These expenditures support all the activities of agencies and cannot be easily allocated to a specific domain. The removal of this begins to signify direct service funding and move CSBG away from the idea of building capacity and expanding an agency to maximize results.

Section B

In previous versions of the report, data on agency staff certifications was collected, which played a significant role in substantiating the capabilities and qualifications of staff involved in executing CSBG-funded programs. Restoring this data collection would not only enhance transparency, but also support agencies in defending organizational funds by showcasing the expertise and professionalism of their staff. We suggest not only maintaining this element in the document to continue highlighting the preparedness and qualifications of personnel within the network, but to also expand that element to provide agencies with the opportunity to add their own certifications.

Report Field C.1

The previous format allowed agencies to directly report CSBG allocations, which is essential for transparency and effective financial oversight. Many agencies have previously attempted to include these figures in an "Other" category, which can lead to inconsistencies and confusion. We recommend adding a dedicated section to report CSBG allocations explicitly, thereby reducing confusion and streamlining financial reporting. This adjustment will clarify the total amount available to each entity and support more accurate financial management and reporting.

Module 3 Recommendations

Module Reordering

Changing module numbers may improve logical flow at a national level but could cause significant confusion among network agencies accustomed to the current structure. Adequate training and clear guidance will be essential to mitigate this confusion.

Also advise removing the comparisons to prior year reporting. The explanations required when reported metrics are out of line with expectations or with prior year reporting adds to the reporting burden without an increase in data value. **This is the overall crutch to delayed reporting from states and the collaboration of the report at the federal level.**

General Service Comment

Service reporting could be further simplified to goods, services, payments, and referrals for each domain.

Section SRV 3

Include "case management" as a distinct service since it often encompasses comprehensive plans for moving individuals out of poverty, which aligns with the overarching goals of Community Action.

Service SRV 3d

Remove SRV 3d and consolidate all transportation services to avoid duplication and confusion, allowing outcomes to be clearly associated with the service provided.

Section SRV 4

Simplify by categorizing services into "housing payments (rent/mortgage)," "utility payments," "housing counseling," "housing goods," and "housing services." This modification aims to reduce confusion and improve data clarity.

The word "emergency" should be removed from descriptions to allow for reporting of ongoing support for those agencies that operate longer term subsidized housing programs.

Section SRV 5

The term "Seniors" should not be defined by the report as "65+". Various programs serving "seniors" have different age requirements that often include those younger than 65; the Older Americans Act defines eligibility for senior services as 60+, while HUD defines senior housing eligibility as 62+. Agencies need to be able to report all participants that were served according to the guidelines of the program being operated. Suggest replacing the current description in SRV 5d and SRV 5j with the term, "older adults" as is used in SRV 5i.

Section SRV 6

Clarify whether SRV 6b includes all board members or only those who are low-income, and consider adding "community engagement skill-building" to allow reporting on broader engagement activities.

SRV 6b should include all board members. Since agencies do not screen for income on their Board of Directors, it is difficult to determine which members qualify as low-income. Those serving in the low-income slots may represent low-income populations without being low-income themselves. Since the statutes and organizational standards require and monitor low-income representation on the tripartite board, reporting it here should not be necessary.

SRV 6c

Participation in self-sufficiency services is not a Civic Engagement and Community Involvement service. This is more appropriately placed in SRV 3 Income and Asset Building.

SRV 6e. The number of individuals participating in community engagement and organizing training. This would track to FNPI 6a.

Section SRV 7

If added, ensure there is no duplication of transportation services reported in other sections, and simplify to "transportation payments" to cover all types of transportation aids. We advocate for removing SERV 7c and SERV 7d, but retaining the separate categories of SERV 7a, 7b and 7e.

General FNPI Comment

Add an "Other" outcome section for each domain to foster innovation and identify new reporting trends in the network.

Section FNPI 1

Add outcomes that specifically measure the securing and maintaining employment of unemployed people, as specified in the CSBG Statutes. Outcomes FNPI 1a and 1b are not necessary and are duplicative of FNPI 2d, where they should be counted.

Outcome FNPI 1c.

Add: Number of unemployed youth who obtained and maintained employment during the reporting period.

Outcome FNPI 1d.

Add: Number of unemployed adults who obtained and maintained employment during the reporting period.

Outcome FNPI 1e.

Add: Number of employed individuals who maintained employment during the reporting period.

Outcome FNPI 1f.

Rewrite: Number of employed individuals who increased income from employment during the reporting period.

Outcome FNPI 2a

Enrollment in a program is not an outcome, therefore it should be removed. The outcome

measuring the success of an early childhood program is “improved school readiness.”
Suggestion: FNPI 2a. Number of children age 0 to 5 who achieve age-appropriate school readiness benchmarks.

Outcome FNPI 2b

Connection to a program is not an outcome, therefore it should be removed. The outcome for measuring the success of a program of this type is “improved skills” or “achieving at academic standards.” Suggested: FNPI 2b. Number of youth served by Community Action who achieve grade-level academic benchmarks.

Outcome FNPI 2e

Enrollment in a program is not an outcome, therefore it should be removed. The outcome of a post-secondary education program can be captured in FNPI 2f.

Outcome FNPI 3a

Completing training is not an outcome, therefore it should be removed. The outcome would be “improved financial well-being” or “maintaining a budget for 90 days.” These should be added back. Although numbers may be lower, these are key outcomes for the network.

Outcome FNPI 3c

It is questionable whether purchasing a home improves a person's ability to escape poverty. Further, this is a housing outcome.

Outcome FNPI 4f

Being served by a program is not an outcome. The appropriate outcomes would be “avoided utility disconnection” and “established utilities.”

Outcome FNPI 4g

Being served by a program is not an outcome. The appropriate outcomes would be “improved water safety” or “improved water quality.”

Outcome FNPI 5a

The verbiage “preventative measures” is not an outcome, therefore this verbiage should be removed. The use of the word “improve” in FNPI 5a and 5f could lead to inconsistency when doing reviews/audits of CAAs and the data required to support CSBG annual report outcomes. One state monitor could expect the CAA to produce data that shows physical and/or mental health improved for clients who were reported as achieving these outcomes, while another could not.

Outcome FNPI 5c

Receiving services is not an outcome. What is the problem that is being resolved?

Outcome FNPI 5d

Receiving services is not an outcome. The results of a service of this type can be communicated in FNPI 5a.

Outcome FNPI 5e

Receiving services is not an outcome. The appropriate outcome is “maintaining independence.”

Outcome FNPI 5g

Receiving services is not an outcome. The appropriate outcome is “improved oral health.”

Outcome FNPI 5h

Receiving services is not an outcome. The appropriate outcome is “improved oral health.”

Outcome FNPI 5i

Receiving access to food is not an outcome. The appropriate outcome is “improved food security.”

Demographics

Is “retired” not included in “Not in labor force?”

Is it necessary to differentiate between “Two adults, no children” and “Multiple adults, no children” for the purposes of national reporting?

Does the information to be collected produce significant burden? If so, how could the burden be minimized on respondents, including through the use of automated collection techniques or other forms of technology?

The efforts to consolidate fields in the new CSBG Annual Report 3.0 are highly commendable. While we applaud the potential to improve data quality and reporting efficiency, we must also express concern about the possible implications of this streamlined approach. Our analysis suggests that while the new format effectively reduces complexity, it may inadvertently underrepresent the full spectrum of initiatives directed at eliminating the causes of poverty. By increasing the emphasis on poverty conditions, the report risks overshadowing the comprehensive efforts undertaken by Community Action Agencies to address systemic issues. This shift in focus could potentially impact the political support that is crucial for sustaining and expanding these programs.

The biggest concern towards creating a significant burden is that Annual Report 3.0 is attempting to place all data collection on a reporting schedule of October 1 to September 30. A clear understanding of what the Annual Report is attempting to explain must be established prior to this being a possibility. If the Annual Report is reporting a particular point in time count of expenditures, outcomes, and services, then a single time frame can be set for all states. If the Annual Report states “these are the accomplishments based on a specific federal fiscal year funding,” then setting a timeframe the same for all states will not be correct or will create a large burden on separating funding year reporting.

Furthermore, changing a report year midway can be a significant burden for several reasons. First, it requires a thorough review and adjustment of all financial data and statements, which can be time-consuming and resource intensive. This process includes revisiting and updating financial records, reconciling accounts, and ensuring accuracy in the financial reporting process. Second, changing the report year may disrupt the comparison and analysis of data. Annual Reports are often used to evaluate the performance and trends of a CSBG Eligible Entity over time. Changing the report year midway can make it difficult to accurately compare data with previous years, potentially affecting decision-making and financial planning. Changing the report year may raise questions and concerns from elected officials, funders, and other interested parties who rely on the accuracy and consistency of this information.

The training cost associated with implementing a new report can be a significant burden. This will involve hiring trainers or consultants, developing training materials, scheduling, conducting training sessions, and providing ongoing support to agencies. All these activities require allocation of time, manpower, and budget, which can strain the resources of our Network that has already been operating underbudgeted for some time.

Training costs will also escalate since the new report involves complex systems and technologies. Employees may need to be trained in new software, tools, or data analysis techniques. This could involve specialized training programs or external experts, which can be expensive. There is a potential productivity loss during the training period. Employees need time away from their regular tasks to attend training sessions, which can impact their ability to fulfill their daily responsibilities. This can result in a temporary decrease in overall productivity until employees become proficient in using the new report.

At a time when many agencies are facing difficulties with employee retention post-pandemic, there is the risk of employee resistance and heightened stress due to change. Some employees may be resistant to taking the time to learn new skills or adopting new reporting methods. Overcoming that resistance may require additional training resources and a shift in management efforts, further increasing the burden of training costs.

What, if any, additions, revisions, or modifications to the information collection would you suggest?

The Service to Outcome Plan implies that all outcomes and services are directly related, or that an agency delivers them directly in a vacuum. OCS needs to clearly identify their opinion on what constitutes an effected outcome. Often things like energy, food access, or rental assistance could determine an individual's ability to maintain a job. This is a common misunderstanding by policy makers that "getting a job" or "keeping a job" are not activities simply related to employment services. Often, even obtaining a job does not imply that families no longer require ongoing assistance to remain in the workforce.

Other examples include:

SRV 4d "The number of individuals who received utility payment assistance (to include deposits, arrears, and assistance)" is considered Concrete Support. Suggestion: why not associate SRV 4d with an FNPI of "avoid utility shutoff or had utility service restored"? There is a similar correlation with receiving rental assistance service and achieving the outcome of avoiding eviction.

SRV 5q. "The number of individuals receiving prepared meals (e.g.: through a congregate nutrition site, Meals on Wheels, a prepared food delivery or pickup program)". What is the unit of measure for this SRV? In some cases, it can be difficult or impossible for the CAA to count individual, unique people who received prepared meals. For example, one CAA had a contract with their county to prepare congregate meals using the resources of a commercial kitchen and fresh produce from small farms and gardens; they provided the meals, and a different entity served them. They can count the number of meals but cannot count the unique individuals who received them. Proposal: provide flexibility for the CAA to report "number of services" for SRV such as this, with a requirement to specify the unit of measure when not individuals.

In CSBG 2.1 the instructions say to count all members of households for domain 4 (housing) SRV & FNPI. We recommend applying this same approach to all domains for simplicity & consistency, and because a strong argument can be made that when one person in a HH receives a service or achieves an outcome, all members of the HH benefit.

Other items being removed limit agencies in their ability to tell the story about the agency too. Items include:

- The removal of the previous Module 2 - Staffing certifications; this is an opportunity for agencies to show their capacity.
- The removal of FNPI 5d-5f is crucial because Parenting programs and senior programs are reported here.

- The removal of the previous FNPI 7a - reporting individuals with multiple outcomes; this is a great way to share clients who get more than one service and helps the agency share success stories internally.

Using FFY is hard for agency systems and internal reports that are already set to calculating a calendar year. This shift will be a massive undertaking, and the sizeable time and monetary investment warrant further consideration by OCS. Additionally, OCS should determine if they want a report of outcomes during the timeframe or want a report of the dollars allocated for that FFY.

Many CalCAPA members share the concern that OCS rewrote the outcome-tracking rather than focusing time on rewriting manuals and providing training and technical assistance to state offices that oversee the data collection. This report overhaul comes across as a way to make up for the shortcomings of previous years' attempts to collect, compile, and communicate data from state offices into the federal report. This maneuver will punish agencies by forcing them to sacrifice resources and reliable reporting, ultimately shaping the data in a way to simplify the state office collectors and OCS processes, rather than to better tell the story of CSBG.

Given the significant concerns raised with the proposed CSBG Annual Report Version 3.0 and the lack of comprehensive engagement with the Network, we ask that OCS consider clearing CSBG Annual Report Version 2.1 at this time and engage with the Community Action Network prior to the clearance of Version 3.0 in order to allow for a collaborative process that genuinely reduces burden while preserving the quality and integrity of the report.

Thank you for the opportunity to provide feedback on the proposed changes. Please feel free to contact us directly if we can provide any additional information or support during this process. We look forward to working with OCS on these critical issues that affect the continued stability, efficacy, and health of the California Community Action Network as well as the social and economic wellbeing of families we serve.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Knight', with a stylized, cursive script.

David Knight
Executive Director
California Community Action Partnership Association