



# IDAHO DEPARTMENT OF HEALTH & WELFARE

BRAD LITTLE – Governor  
ALEX J. ADAMS – Director

JENNIFER PALAGI – Interim Administrator  
STATEWIDE SELF-RELIANCE PROGRAMS  
450 West State Street, 2<sup>nd</sup> Floor  
P.O. Box 83720  
Boise, Idaho 83720-0036  
PHONE 208-334-5815  
FAX 208-334-5817

Dr. Lanikque Howard  
Director, Office of Community Services  
Administration for Children and Families  
Department of Health and Human Services  
330 C Street, SW  
Washington, DC 20201

Dear Dr. Howard:

We are writing in response to the Office of Community Services' (OCS) release of the Dear Colleague Letter (DCL), ACF-OCS-DCL-24-09, advising the CSBG Network of the notice of information collection activity posted in the Federal Register, Vol. 89, No. 78, on April 22, 2024.

We believe the proposed changes outlined in the DCL would have the unintended consequence of impeding the Network's ability to fully share the longstanding impact this vital funding stream has had on American communities, families, and individuals.

#### Modifications to State System:

The proposed changes to the CSBG Annual Report are significantly different from the current Report and will require substantial modifications to our system for data collection and processes. These modifications will require the investment of time and financial resources to modify the existing data system and require additional training and technical assistance to CSBG Eligible Entities. These changes will increase the administrative burden as we implement the changes and provide support to our subrecipients. As a small state with limited staff, the suggested changes pose a big impact.

#### Federal Fiscal Year (FFY) Reporting Period:

OCS proposed that all modules would be reported on using the Federal Fiscal Year. This does not directly impact Idaho, but we understand this could have a substantial impact on other states that do not currently utilize this reporting timeframe. Modifications to subrecipient contracts, data systems, and other forms would be required, and would result in undue burdens during the implementation phase.

#### Change to the Services and NPIs:

With the proposed changes to the services and NPIs, there will be a need to update our data system, CAP Plans, CSBG Eligible Entity refunding applications, and similar items. These changes would require time and financial resources to realign them with the 3.0 version.

#### Movement from Outcomes to Outputs:

NPIs play a vital role in the story of CSBG. Unlike services that communicate what was done, the NPIs communicate what results were achieved. The changes drastically modify the approach, focusing more on outputs rather than outcomes. This change “checks a box to get a number” rather than focusing on what has changed for clients and the community as a result of CSBG Network efforts. Some of the proposed NPIs are duplicative of the services with which they are aligned. Rather than being the result of the service, they are just a rewording of the service language. This is concerning as this will impact the Network’s ability to help successfully tell the story of how it is changing lives and improving communities.

#### Elimination of Several NPIs and Services:

OCS has indicated that elimination of NPIs and Services would decrease the burden of data collection. However, the current NPIs and Services are a menu of options from which CSBG Eligible Entities can choose, not a list that must be reported on. The true result of the proposed decrease is the elimination of possible reporting options, not an actual decrease in the data collection burden. In fact, these changes will actually increase the administrative burden due to revisions to the current data collection and reporting systems necessary to align with the proposed 3.0 version.

Elimination of these options will impede us from reporting at the national level what is happening at the local level. CSBG is one of the most unique funding sources in that it allows flexibility to use the resources based on the needs of the community and the individuals living in it. It is important that the Annual Report can demonstrate this flexibility. Updating the current list of services and indicators to improve data collection and reporting is very much needed, but the elimination of the services and indicators and reporting other services and outcomes, will make it difficult to demonstrate the true impact of the funding stream locally.

The proposed change to eliminate the Multiple Service domain, under both the Service and NPI sections is very concerning. The number CSBG Eligible Entities that are currently reporting under this domain, and the elimination of these services and NPIs would have a negative consequence of not being able to report the comprehensive CSBG story. FNPI 7a, SRV 7a, SRV 7b, and SRV 7c are the four data points that are suggested to be continued in the Report’s NPIs and Services. FNPI 7a. is challenging for some CSBG Eligible Entities making the elimination of the multiple service indicator problematic. We would recommend implementing training and technical assistance to address identified issues while allowing the NPI to remain as an option to be utilized and reported on.

It is important to understand that we use the current list of Services and NPIs to communicate and advocate our work at the state and community levels. It is concerning that these commonly used Services and NPIs are not in the proposed 3.0 version. While we are able to collect additional data beyond what is reported nationally, the resulting effect appears to shift the reporting burden from the federal level to the state and local level, not an actual decrease in the reporting burden.



Impact on Data Analysis:

The significant changes to the services and NPIs will impact the value of trend analysis. There is a lot of historical data available to the network for longitudinal trend analysis. With the proposed v. 3.0 Services and NPIs being significantly different—either because of deletion, modification, and/or merging—the ability to compare them with the historical data would be significantly impacted, effectively eliminating the Network's ability to demonstrate CSBG's long-term outcomes and successes. We believe that the proposed changes will cause data analysis will lose most of the value.

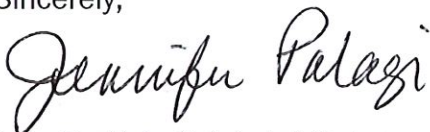
Unduplicated Count Requirement:

Not changing the unduplicated number of individuals served requirement is a concern. This requirement is very difficult to meet considering the data being collected from the various programs being administered. The work involved to obtain an unduplicated count ultimately results in an increased administrative burden when completing the CSBG Annual Report. The real result of the unduplicated requirement is that these services and outcomes are ultimately underreported which affects the data being reported to decision makers about this program.

We would like to see that this requirement be reconsidered and that changes to the proposed v. 3.0 report would promote opportunities for more robust reporting without a significant administrative burden to do so.

In addition to our concerns outlined above, we request that when the CSBG Annual Report v. 3.0 is implemented, adequate guidance and support be provided to the CSBG Lead Agencies and the CSBG Eligible Entities at the beginning of the process. This should be in the form of clear instruction and definitions of what is being collected to ensure that the Report is being implemented consistently across the CSBG Network, that adequate training and technical assistance to help with the understanding and implementation of revised report is provided, and that adequate financial support to modify the existing systems is made available.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Palagi". The signature is written in a cursive, flowing style.

Jennifer Palagi, Administrator  
Division of Self-Reliance  
Idaho Department of Health and Welfare

