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VIA ELECTRONIC MAIL ONLY

Administration for Children and Families
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**SUBJECT: CSD Comments on OCS Proposed Annual Report 3.0 Framework
Outlined in ACF-OCS-CSBG-DCL-24-09**

To Whom It May Concern:

On April 22, 2024, the Office of Community Services (OCS), Administration for Children and Families (ACF) posted ACF-OCS-CSBG-DCL-24-09 (DCL-24-09) to the Federal Register in Volume 89, No. 78, Office of Management and Budget (OMB) #0970-0492, pages 29339-29340, outlining proposed changes to the Community Services Block Grant (CSBG) Annual Report. The California Department of Community Services and Development (CSD) has reviewed DCL-24-09 and associated attachments to assess the necessity, quality, clarity, and potential burdens of the proposed changes.

CSD is pleased to work in collaboration with the California network of local CSBG agencies and our State Association partner, the California Community Action Partnership Association (CalCAPA). Following a review of the proposed response to OCS from California's CSBG agencies and CalCAPA, CSD confirmed its alignment with many of the CSBG agencies' recommendations, including those regarding Family National Performance Indicator (FNPI) Outcome Descriptions, the transition to the federal fiscal year (FFY) calendar for annual reporting, a change to number sequencing for Modules 3 and 4, Module 2 Line A.1 Itemized Expenditure Breakdown, and Weighing Reporting Burden Reduction Against the Need to Develop Sufficient Performance Measures to Demonstrate the Value and Impact of CSBG Funding to Federal Policymakers.

Please find a summary of feedback identified during CSD's review of the proposed Annual Report 3.0 below. For clarity, recommendations appear in **bold**. CSD looks

forward to continuing to partner with OCS to refine the proposed framework and strengthen CSBG data collection.

FNPI Outcome Descriptions

In articulating the goals of the CSBG Annual Report during the initial development process in 2017, in Information Memorandum 152, OCS identified the following goals, among others: “At the local eligible entity level, the information in the CSBG Annual Report will support agency efforts to set and measure progress on targets for individual, family, and community outcomes resulting from locally-determined services and strategies to address locally-identified community needs.”

Recommendation: CSD encourages OCS to ensure that finalized FNPI language reflects, to the greatest extent possible, the stated intent of the Annual Report to clearly illustrate client achievements, connect to the three goals of the CSBG theory of change, and capture the full impact of the CSBG Network to address the root causes of poverty.

Consistency and Clarity of Terminology

Through its review, CSD noted several FNPIs and services (SRVs) which used age-related demographic terms where the age range of the individuals intended to be included in that group were unclear. The terms “young children,” “children,” and “youth,” as well as “seniors” and “older adults” are used in the descriptions in several FNPIs and SRVs.

Recommendation: CSD recommends, if these age-related descriptors are intended to be synonymous, the use of designated terms and definitions throughout the report to describe each of these demographic groups. Whether a single descriptor for each of these demographic categories can be determined or not, please consider including the covered age ranges (X-Y) for each term whenever terms like young children, children, youth, and young adult, older adult, or senior are used to eliminate potential confusion and allow for consistent reporting.

Weighing Reporting Burden Reduction Against the Need to Develop Sufficient Performance Measures to Demonstrate the Value and Impact of CSBG Funding to Federal Policymakers

CSD recognizes that it can be a daunting task to develop a definitive list of potential program outcomes which balances the goal of reducing the administrative burden the Annual Report places on agencies against the foundational premise of CSBG to allow for local determination of the best methods to address the barriers to self-sufficiency facing those in poverty.

Recommendation: To achieve these two equally laudable goals, where state associations, individual agencies, state lead agencies, or other partners, raise concerns about the adequacy of the revised indicators to meet this objective,

CSD encourages OCS to evaluate those concerns and craft opportunities for agencies to highlight their unique, impactful methods for addressing poverty in their communities wherever possible. CSD recognizes that there may be instances where qualitative methods other than program service and outcome reporting may be advisable to respond to specific concerns raised.

Clarifying The Purpose and Goals of The Service Outcome Plan

Recommendation: To place agencies in the best position to benefit from the Service Outcome Plan, CSD encourages OCS to provide clarification on the goals and intent of the Plan. Specifically, whether this Plan is intended to be non-binding guidance to help support agency planning and reporting or whether it is designed to capture every potential service-to-outcome connection. Further guidance on how OCS will utilize this Plan when evaluating state Annual Report submissions and performing compliance oversight of state lead agencies would also be beneficial.

Transition to FFY Calendar for Annual Reporting

As one of the seventeen states impacted by this proposed change, CSD appreciates the desire to align state annual reporting to a single, consistent timeframe.

Recommendation: CSD strongly encourages OCS to take into consideration and make provisions for the investment of time and resources that will be required to update digital data collection platforms and reporting policies and procedures, as well as provide staff training on this new reporting timeframe. To the highest allowable degree, allowances to accommodate this burden should be made.

Transition from DUNS to UEI

CSD has already implemented this change throughout the state CSBG Network and does not anticipate any additional steps that will need to be taken to affect this change.

Streamlining of State Administration Module 1

CSD appreciates the consolidation or elimination of numerous data elements throughout this module. These changes have the potential to significantly reduce the administrative burden currently required to complete this portion of the Annual Report.

Module 2 Line A.1 Itemized Expenditure Breakdown

CSD concurs with the support expressed for this change in Community Service Block Grant Eligible Entity (CEE) expenditure reporting in the comments submitted by California's state CSBG agency association, CalCAPA, which reflects the sentiment of CEEs in the California CSBG Network. This approach clarifies the reporting requirement and potentially reduces the administrative burden of both the state lead agency and CEEs.

Recommendation: It may be advisable to add a line A.1e, which auto-calculates agency expenditure reporting on lines A.1a through A.1d. This could serve as a useful quality control check for agencies prior to submission of their Annual Report for state agency review by allowing them to confirm that the total expenditures reported in this area and those shown on line A.2k are actually the same.

Module 2 Reporting of CSBG Allocation

With the removal of line C.2 from the Annual Report 3.0 framework, CSD requests clarification on how and where agencies will report their total annual CSBG allocation for inclusion in the auto-calculated total of total agency resources.

Change to Module Numbering Sequence

If this change is simply intended to place the two modules agencies are required to report on in consecutive order in the reporting layout, CSD encourages an assessment of CSBG Network feedback to determine if the cost outweighs the benefit of this change to the form.

Ongoing Refinement of Community-Level Reporting

Recommendation: CSD urges OCS to review the feedback received from CEEs currently engaged in community-level projects as they are well positioned to evaluate the benefits and workability of the proposed changes to this module.

General Recommendations:

- Several FNPI and SRV descriptions use the present tense (e.g., receiving, participating, attending, etc.). Since the Annual Report captures services provided during the previous program year, consider using past tense descriptions instead (who received, who participated, etc.).
- Ideally, the release of module-specific instruction manuals should be provided concurrent to the release of the final Annual Report 3.0 framework to guide agency planning and allow for adequate training.
- To the greatest extent possible, this manual should include definitions which describe the intended meaning of programs, services, outcomes, and client descriptions used in the report.

In closing, CSD would like to reiterate the value it sees in our ongoing partnership to achieve our mutual goal of strengthening the CSBG Network and eliminating the barriers facing those in poverty. If you have any questions regarding any of the points noted above, please contact Wilmer Brown, Jr. at (916) 594-2290 or Wilmer.Brown@csd.ca.gov.

Sincerely,

Daphne Hunt

DAPHNE HUNT
Deputy Director of Programs