



Comments: Proposed Changes to the CSBG Annual Report

June 21, 2024

After a series of feedback sessions and in collaboration with our 23 CAAs in Massachusetts and our CSBG state agency, we at MASSCAP, as the State Association, urge the clearance of the proposed 2.1 version of the CSBG Annual Report. We also encourage OCS to engage in a more collaborative process with the Community Action network before clearing version 3.0 of the report. We all agree with and will benefit from an edited version of the CSBG Annual Report, and appreciate OCS starting this process, but believe that the best version of the edited report will come from an inclusive process of gathering and integrating feedback.

With more than 1,000 Community Action Agencies across the country, the work of Community Action through the Community Services Block Grant is diverse, vast, and dynamic. Because of this reality, lessening the scope or burden of the CSBG Annual Report requires a delicate balance of eliminating unnecessary time and work while still fully allowing agencies to report on the nuances of their programs and services and the realities of poverty in their specific communities.

Deduplicated counts will be nearly impossible and burdensome because of the variety of data systems agencies use, and the nature of service provision in many programs. This will likely lead to the reported numbers served being decreased, which has the potential to underestimate the scope of clients served & hurt funding in the long run.

- Finding a simple and accurate way to get deduplicated counts has long been a goal of Community Action Agencies. Unfortunately, due to the complicated patchwork of data entry systems, casework software, and a lack of data bridges, we have yet to find a workable way to get accurate deduplicated counts across programs and services. We agree that this is a worthwhile goal that will benefit all levels of staff and government, but under the proposed changes that do not include provisions for data bridges or a unified data tracking system, our concern is that the deduplicated numbers of individuals and households served will need to be reported as lower than they really are. When data is entered into different systems for different services and a customer receives several different services, it is nearly impossible to cross-reference across systems to ensure a deduplicated count. Additionally, for some services like transportation programs that offer shuttles or rides, the needed amount of information per participant would be a barrier to entry for many people (i.e. a social security number in order to get on the bus). With these known limitations, agencies will be in a position to under-report numbers served if they can't ensure unduplicated counts. This would lead to a likely sharp decrease in services for at least the first year of this new report format, which would incorrectly undersell the amount of work being done and the number of individuals and families being served by CAAs. This could lead to underestimation of the need for these services, and from there a decrease in the perceived urgency for funding.

Multi-Domain NPIs are necessary to tell the story of community action as so many services build on each other and don't have a simple one-to-one outcome (i.e. case management, financial counselling, etc.) This minimizes the focus on service integration, which is an essential part of service delivery at CAAs.

- One of the things that make Community Action Agencies so unique in terms of fighting poverty is the fact that they offer a large array of services and programs aimed at addressing not only the results, but the root causes of poverty. One of the agency Executive Directors in Massachusetts aptly refers to CAAs as “the Swiss Army Knife” of human services. The way that this method of service delivery works is through a mosaic of intra-agency referrals, intensive intake forms, and layered services that support individuals and families across many domains simultaneously. For example, providing an individual with workforce-readiness coaching alone does not remove all of the barriers to a living wage job. The customer might also receive childcare vouchers so that their children are enrolled in a daycare and afterschool program while they’re at work, along with transportation support to get to and from the job reliably, and clothing to ensure that they have the necessary, appropriate clothing to get and keep the job in question. While each of these services and programs alone are necessary, they are all needed in tandem to create the desired outcome for the customer and their family. Eliminating cross-domain NPIs obscures this reality and eliminates agencies’ ability to fully tell the story of how the work they do truly serves their customers and is not just a series of one-off benefits or meetings.

Collapsing and removing NPIs will not actually reduce the burden or amount of work that goes in to collecting the data, it will simply remove the nuances and scope of work done by agencies, thereby minimizing the impact of this report and limit its ability to express the full scope and scale of the work CAAs do at the individual, family and community level to address the root causes of poverty.

- Everyone involved in the CSBG Annual Report process is aware of the length, complexity, and time commitment it entails, and we appreciate any consideration to lessen the burden of the report. The concern is that the proposed change that will collapse and remove over 100 NPIs will not significantly lower the time burden but will limit the ability of agencies to report on the work that they do, and the vast array of services and programs offered. Under the current version of the CSBG Annual Report, a vast array of NPIs are laid out like a menu, for CAAs to select and report on the ones that they offer, while leaving out the ones they do not. This allows agencies to more accurately offer a picture of not only the work that they do, but the unique status and story of poverty in their communities. Agencies are responsive to the needs of their communities, so the services they report on serve as a good indicator of what is needed in any given part of the community. While almost all CAAs offer programs like fuel assistance, childcare, or rental assistance, many have food pantries, young parent programs, weatherization services, or robust veteran supports. Not having a space in this report to speak to these more specific programs doesn’t lessen the burden of the report, it simply leaves a blind spot for the work being done in communities, the important uses of the CSBG grant, and the causes and conditions of poverty in any given community. In Massachusetts, there are four main service areas that would not be reportable in the proposed 3.0 version of the CSBG Annual Report: VITA/EITC/other Tax Preparation programs, case management, eligibility determinations, and referrals. In terms of the tax-preparation services, the VITA program acts as the point of entry for many customers across the state. They come in to have their taxes prepared, only to realize that they are eligible for fuel assistance, weatherization, food assistance, and many other services. Once they have a foot in the door at an agency, they can benefit from wraparound services that CAAs are uniquely positioned to provide. This leads perfectly into the other three top services that wouldn’t be reported in the proposed updated report which serve as the backbone for the approach to addressing poverty that Community Action was founded on. It is essential to the spirit of our work, and to the stated goals of the Community Services Block Grant that agencies are given the opportunity to report on their unique blend of services and programs aimed at not only addressing the impacts of poverty, but its root causes as well.