

## Proposed Changes to CSBG Annual Report

Response from Action for a Better Community, Inc. – a CAA serving Monroe and Ontario Counties, NY

1. *Whether the proposed collection of information is necessary for the proper performance measurement of federal, state, or local agencies.*
  - a. Some form of data collection and reporting are essential to the Community Services Block Grant. To demonstrate the unique power of this federal funding, CAAs will need to demonstrate that their programs have impact. The proposed changes **remove some important outcomes**, especially related to employment and education. Eliminating these from the Annual Report severely limits our ability to show our impact and prove that CSBG is essential to fighting poverty. During the life of the American Recovery and Reinvestment Act (ARRA), CSBG was one of the leading job-creators and employment programs run by the federal government. This omission seriously diminishes federal and state agencies' ability to demonstrate the full impact of CSBG.
2. *The quality of the information to be collected.*
  - a. **Many of the new FNPIs are not outcomes at all, but are instead services.** Here are a few examples:
    - i. FNPI 2a. The number of young children (0-5) enrolled in childcare or early childhood education services
    - ii. FNPI 3a. The number of individuals completing income and asset building training.
    - iii. FNPI 5b. The number of individuals with access to health coverage.
    - iv. FNPI 5i. The number of individuals receiving access to healthy food options
  - b. **The removal of all services related to Case Management:** This service demonstrates that CAAs work with the whole person/family as opposed to simply providing isolated services. Bundled services, the Whole Family Approach, 2Gen – all of these approaches to providing self-sufficiency service rely on some form of case management. Removing these services from the report risks omitting a significant part of the Community Action approach – leveraging resources and connecting customers to them,
  - c. **Removal of Sources of Income, Other Income, and Non-Cash Benefits:** Sources of Income needed to be simplified, but completely removing them eliminates important information, especially the reporting of benefits such as SNAP, WIC and TANF. ABC is currently leading a community coalition helping families with low-incomes avoid the benefits cliff. CAAs should be encouraged to continue collecting data regarding sources of income to better illustrate how the network leverages existing public benefits to advance economic self-sufficiency. Not

reporting full data regarding income diminishes the quality of the CSBG story by not fully demonstrating leveraging of resources.

- d. **Community level impact by CAAs is poorly measured by the proposed reporting instrument:** The current Module regarding community-level change hypothesizes that CAA community-level work happens in a very circumscribed way and that it has a finite timespan: a plan is developed, it goes through an implementation phase and it then reaches a maturity phase. This is characteristic of some community-level work, but seriously underreports the vast array of community level work CAAs engage in. Because the Annual Report so poorly captures community level work, it grossly misrepresents the impact of the CSBG program – it makes CSBG look like it is primarily a service delivery funding program; it is not. CSBG is an anti-poverty funding stream – emphasizing BOTH services to individuals and community change. The proposed report provides a narrative about CSBG that is irresponsible and misrepresents the legislative intent of the program.
- e. **The proposed report suggests CSBG is primarily used for discrete services that follow a one-outcome-per-service model.** This is further reinforced by the effort to “map” services into outcomes. While it is obvious that services should lead to outcomes, the report falsely communicates CSBG functioning as a funder of siloed services. It is much more the case that multiple services, in concert, produce a bundle of outcomes. The proposed report’s dependence on this data model provides a low quality description of CSBG’s function and impact. OCS should deeply collaborate with local CAAs to jointly develop measures that demonstrate the uniqueness of CSBG. Unlike most federal funding where there is a singular specific impact (improved health, higher education, employment, etc), CSBG’s proposed impact is poverty reduction/elimination – the Annual Report must underscore the complexity of poverty elimination rather than reduce it to a service-impact quantitative data model.

### 3. *The clarity of the information to be collected.*

- a. Some of the wording is **not complete or does not make sense**. Here are a few examples:
  - i. FNPI 5h. The number of children preventative oral health services.
  - ii. SRV 2e. The number of individuals **that receiving** K-12 Support Services (e.g.: English, literacy, etc.)
  - iii. SRV 5u. The number of diapers/diapering supplies (e.g.: diapers, wipes).

4. *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 collection.*
  - a. The collection of data will always produce a burden. The proposed changes will slightly reduce that burden but is not worth the loss of data previously referenced.
5. *The accuracy of the agency's estimate of the burden of the proposed collection of information.*
  - a. OCS does not appear to understand that the resource burden of the CSBG Annual Report is significantly driven by reporting infrastructure: staff time, database maintenance and training, etc. Eliminating some outcome/service indicators has minimal impact on the reporting burden. OCS is seriously misstating this in their proposed estimate of reporting burden.
6. *What, if any, additions, revisions, or modifications to the information collection would you suggest?*
  - a. **Additions, revisions, modifications to Information collection should be identified through a collaborative process that includes those most knowledgeable – the 1,000+ local Community Action Agencies that collect, analyze and act on the data that are reported. No significant collaboration occurred prior to the proposed changes, resulting in changes to the report that fail to demonstrate the full impact of CSBG.**
  - b. **Include an outcome related to obtaining employment.**
    - i. It is important for CAAs to show the impact of employment programs. Leaving out 'obtain employment' means that we will not report on one of community action's most important outcome.
    - ii. Limit this outcome to obtaining employment without reference to a living wage. There is little burden to collect and record data on obtaining employment, but the term 'living wage' is not consistent and would be a larger burden.
  - c. **Change FNPI 2d because the related services do not match the outcome and the outcome is unrealistic** (*The number of individuals who obtained a recognized credential, certificate, or degree relating to the achievement of educational or vocational skills*).
    - i. Adults at these educational levels are unlikely to obtain that level of credential. Adult Basic Education is defined as grade level 0.0 to 8.9.
    - ii. A more appropriate outcome is "increase basic education skills".

- iii. **SRV 2n. The number of individuals attending basic education classes**  
(~~e.g.: financial literacy~~).
  - 1. **Adult Basic Education (ABE) is defined as “basic skills instruction below the high school level”** and includes reading, writing, math, English language proficiency, and problem-solving to be productive workers, family members, and citizens.  
(<https://aefla.ed.gov/>)
  - 2. **Remove “Financial Literacy” as an example.**
    - a. It is included in SRV 3a (*The number of individuals that received training and counseling services for income management and asset building (e.g.: credit repair, financial literacy, financial management, budgeting, homebuying, foreclosure avoidance)*)
- iv. **SRV 2l is redundant and should be removed** (*The number of individuals attending adult literacy classes*). It is part of ABE.
- v. **SRV 2m is unclear** (*The number of adults attending English Language classes*). Is this meant to track English Language Acquisition (ELA) classes for speakers of other languages?