



SOUTH TEXAS DEVELOPMENT COUNCIL

June 18, 2024

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

Ref: Comments on Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Progress Report (Office of Management and Budget No. 09-70-0492)

Dr. Howard,

On behalf of the South Texas Development Council (STDC), we would like to thank you for the opportunity to provide public comments on the proposed changes to the CSBG Annual Report entitled "*Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Progress Report (Office of Management and Budget No. 0970-0492)*" as published in the Federal Register.

STDC is one of thousands of Community Action Agencies (CAA's) across the country serving in the front lines to support, encourage, and empower our most vulnerable households and individuals. STDC has been a designated Public CAA/CSBG Eligible Entity since 2008 servicing the counties of Jim Hogg, Starr, and Zapata in South Texas. With the Office of Community Services' (OCS's) support, we've been able to reach thousands of vulnerable households and individuals with limited resources.

STDC's begins with a response to questions 1 through 5 before diving into specific line items or sections asked by question 6. Wherever possible, to reduce the burden on OCS, STDC comments build upon those submitted by the National Community Action Partnership (NCAP) so as reduce duplication unless additional context is being provided to add clarity.

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

The collection of information is necessary not only for proper performance measurement but also to comply with the CSBG Act Accountability and Reporting Requirements (§678E.(a)(2)) and the Government Performance and Results Act (GPRA). The CSBG Act requires OCS, in collaboration with State and Local agencies, to facilitate the development of one or more model performance measurement systems which may be used by states and local agencies to measure their performance in fulfilling CSBG requirements (42 U.S.C. §9917).

However, STDC strongly feels that OCS has not fully adhered to collaboration with State and Local agencies in developing, or in this case updating the model performance measurement system. NCAP has also addressed this concern in their comment's submission (pg. 3, line 3: Meaningful Engagement; and pg. 5 § III. NCAP Supports a robust regulatory review process for changes to the CSBG annual report information collection request (ICR)). The current process utilized by OCS did not include engagement with state and local agencies to conduct a review of the current performance management measures prior to releasing the proposed changes. We agree with NCAP that a facilitated engagement between OCS and State and Local Agencies should occur prior to the final clearance of Version 3.0.

2. The quality of the information to be collected.

In terms of the quality of the information to be collected, STDC strongly supports NCAP's comments subsection related to *Outputs Reported as Outcomes in CSBG Annual Report Version 3.0* (pg. 14, VI. Quality). The proposed revisions represent

a significant departure from established Community Action performance management principles, including the Results-Oriented Management and Accountability (ROMA) framework...and undermines the fundamental beliefs of Community Action, which emphasize not only the provision of services but also the creation of meaningful change.

STDC strongly encourages OCS to keep Output reporting measures listed as Services and Outcome reporting measures that bring about change to be reported as FNPIs. STDC strongly supports NCAP's comments on the proposed revisions to Section B FNPIs that reflect outputs rather than outcomes in the CSBG Annual Report Version 3.0, Module 3.

STDC, however, disagrees with some of the eliminated measures. Specifically, as it relates to the employment measures, job attainment is a common and essential milestone for families and individuals because of Community Action intervention, but we do not agree that there should be a differentiation of living wage vs nonliving wage employment attainment nor with the number of unemployed adults who maintained employment for 90/180 days. We would request that a FNPI capturing "The number of unemployed adults who obtained employment" should be retained. Similarly, STDC would encourage OCS to consider consolidation of other FNPIs currently proposed for elimination in order to maintain available reportable outcomes understanding that local agencies do never report on **all** outcomes contained in the report.

Lastly, we do agree with OCS on streamlining the demographic report with the elimination of Income Source in Household Demographics. While we appreciate NCAP's comments on the potential value to keep D.13, D.14 and D.15, from a data analysis perspective, these measures add little context to the holistic picture of who is receiving services by CAAs. D. 13 would need to be restructured for clarity if it is retained, because the D. 14 Other Income Sources is a combination of public and private income sources. D. 14 would need additional data definitions and increased metric subsections to be added in order for this section to add value in capturing an accurate picture of who is being served. As is, the data is convoluted, and it is sufficient to demonstrate the level of household income related to the Federal

Poverty Level as captured by D.12. Similarly, the elimination of CSBG Annual Report Version 2.1 Module 4 Section C: E-F is welcomed as it overlaps with Section B: A-B.

3. The clarity of the information to be collected.

STDC supports NCAP's comments as it relates to Clarity (NCAP Comments Submission pg. 28 § VII. Clarity). STDC agrees that OCS has not provided sufficient instructions and guidance on how OCS interprets the data points for the network to fully understand what data should be reported where. While it was noted that OCS would engage with the network and partners to develop guidance post adoption, this approach appears to prioritize subsequent steps before foundational actions are completed. OCS, and the network of state, local, and national partners need to have a clear footing of how each performance measure is defined. OCS attempts to provide this by attempting to transition to "plain language", but areas still remain unclear. STDC would encourage OCS to work with the network and partners to develop a definition manual similar to how Area Agencies on Aging have developed service definitions in carrying out their work for the Administration on Aging (a sample which could be found here:

https://www.hhs.texas.gov/sites/default/files/documents/appendix_ii_ffy_2022_service_definitions.pdf.

The definition manual would provide much needed clarity as to how each individual measure is treated and understood across the national network of over 1,000 CAAs. Along with this exercise, the Services to Outcome Plan would have consistent alignment of services to outcomes across the network but detailed guidance is lacking for effective implementation. The Services to Outcome Plan would be better realized if value chain analysis and workflows are mind mapped to have a better understanding of how services may contribute to an outcome, or how multiple outcomes may be achieved through a single service. This could then reflect the real-world interventions carried out by CAA's and demonstrate the flexibility patterns of intervention services implemented by CAAs in their work.

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 technology?

For the most part, STDC agrees with NCAP on its submitted comments regarding Burden (pg. 10 § V. Burden), more specifically subsections: *Burden Related to Proposed Module Revisions*, and *Changes in Reporting Period*. STDC wishes to emphasize that **any** revisions to the current reporting structure will impact existing data systems utilized by local eligible entities and incur costs in order to program these revisions into data systems used by both State and Local agencies. The State agencies will need to update their current collection systems to adjust to the federal requirements, while local agencies will probably incur higher costs with system configurations. Local agencies that have their own data systems, like STDC, will need additional resources to cover costs for configuration as our data system is mapped to capture activity based on individual and family service plans. As a family/individual progresses through a wide range of service plans, their activity is reflected in the CSBG Report. Unlike NCAP, however, we disagree that the swap of Modules 3 and 4 will add on to the burden, the costs for system configuration updates will need to be incurred

regardless of swapping Module order, the data point remapping and configuration update will have to be realized in either case.

Moreover, the changes in the reporting period will impose a significant burden, especially for local agencies in Texas. As stated by NCAP, Texas is one of many states that does not report on a federal fiscal year, and currently follows a calendar year for reporting. To compound the issue, while most states may report on a quarterly, semi-annual, or annual basis, agencies in Texas are required to report on a monthly basis. The transition from one performance period to another that would align with the federal fiscal year will impose undue burden on the state administrative agency to shift contract periods as well as local agencies to shifting one month to another. STDC would request that OCS consider establishing uniform reporting guidelines for all states around reporting intervals (monthly, quarterly, semi-annual, annual) that would reduce reporting burdens on local agencies but adhere to federal reporting requirements.

Lastly, in terms of reduced data points, STDC agrees in part and disagrees in part with both OCS and NCAP on the reduction of data points being considered. There are many data points that are being recommended for elimination, and while STDC agrees the majority of these data point eliminations are ideal, OCS is creating additional data points that don't seem to add value or context to the data that is being collected. This will be elaborated on under item 6.

5. The accuracy of the agency's estimate of the burden of the proposed collection of information?

It remains unclear what methodology was followed for OCS to estimate the agency's burden of the proposed collection of information. STDC understands that as a local agency our perspective in this matter differs greatly from OCS's broad view of the national network. However, STDC would encourage OCS to take into account the reporting methodologies currently in place for each individual state. As previously stated in part 4, Texas requires CAAs to report on a monthly basis. Therefore, the reduction of the reporting burden in the State of Texas will not be realized because the reporting burden will continue month after month. If anything, the reporting burden will increase in the beginning due to implementation of changes to data systems, increased demand for training and technical assistance to understand the proposed changes; and verification checks to ensure changes have been implemented accurately and effectively in data systems. These steps will entail additional costs not currently budgeted by local agencies. Only after these steps are carried out will the reporting burden be reduced to normal levels, because of the ongoing need to provide monthly reports. STDC would encourage OCS to establish a national standard for reporting frequency in addition to any proposed revisions if it wishes to reduce the agency reporting burden across the network.

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

Specifically, STDC would like to comment on the following additions, revisions, or modifications:

CSBG AR Section	CSBR AR Item	Proposed Disposition	STDC Comments
A	FNPI 1a.	Revised	STDC agrees with revision to FNPI1a. The number of unemployed youth who increased skills to obtain employment.
A	FNPI 1b.	Revised	STDC recommends revision to: The number of unemployed youth who obtained employment.
A	FNPI 1c.	Removed	STDC recommends the recommend FNPI1b. proposal of: The number of unemployed adults who increased skills to obtain employment.
A	FNPI 1d.	Removed	STDC recommends consolidation of former FNPI 1c-g. to: The number of unemployed adults who obtained employment.
A	FNPI 1h.	Revised	STDC would agree for this measure to become FNPI 1e.: The number of employed individuals who increased income from employment through a wage or salary amount increase.
A	FNPI 1h.1-3	Removed	STDC agrees with removal.
A	FNPI 1z.1	Removed	STDC agrees with removal.
A	FNPI 2a.	Revised	STDC disagrees with revision. The proposed revision would reduce the tracked measure from outcome to output (FNPI to Service). STDC would recommend consolidating Version 2.1 FNPI a-b: The number of young children (0-5) who demonstrated emergent literacy or school readiness skills.
A	FNPI 2b.	Revised	STDC disagrees with revision. The proposed revision would reduce the tracked measure from outcome to output (FNPI to Service).
A	FNPI 2c-f (including subsections)	Removed	STDC agrees with removal.
A	FNPI 2g-h	Remain	STDC agrees with numbering sequence change.
A	FNPI 2i.	Revised	STDC disagrees with revision. The proposed revision would reduce the tracked measure from outcome to output (FNPI to Service).
A	FNPI 2j.	Revised	STDC agrees with revision as a consolidation of Version 2.1 FNPI 2i and 2j.
A	FNPI 2z.	Removed	STDC agrees with removal.
A	FNPI 4h	Revised	STDC agrees with revision.
A	FNPI 6a.	Revised	STDC agrees with revision.
B	SRV1a-o	Merged	STDC agrees with revision.
B	SRV1p.	Merged	STDC agrees with revision to SRV1d. The number of individuals that received services for employment retention and growth (e.g. referrals, employer interaction, career pathways). Number sequence changes, etc.
B	SRV1q.	Merged	STDC agrees with revision to SRV 1c. The number of individuals that received employment supplies for employment readiness and sustainment (e.g., uniforms, work boots, equipment). Number sequence changes, etc.
B	SRV2a-c		No Comment

B	SRV2d-e	Revised/Merged	STDC recommends revision to state SRV2e. The number of individuals receiving K-12 Education and/or Support Services (English, literacy, etc.). Number sequence change. STDC would caution that this item would require a service definition to ensure standardization across the national network, especially if it's meant to merge Version 2.1 SRV 2d and 2e.
B	SRV2f-q		No Comment
B	SRV2r-s	Remain	STDC agrees with revisions.
B	SRV2t	Remain	STDC agrees it should remain, however, would caution the use of "(e.g.: financial literacy). Again, this item would require a service definition to ensure standardization across the national network. Could potentially incorporate SRV2v as well.
B	SRV2u	Remain	STDC agrees.
B	SRV2v	Removed	See SRV2t comment above or could also be incorporated into new proposed SRV2q (life skills and coaching services).
B	SRV2w	Removed	STDC agrees with removal
B	SRV2x	Remain	STDC agrees
B	SRV2y-bb	Merged	STDC agrees
B	SRV2cc	Revised	STDC cautions proposed revision. Again, this item would require a service definition to ensure standardization across the national network. Home visits at one point were used to track visits to individual's homes that were enrolled in an educational program and then became disconnected or stopped attending.
B	SRV3a-q	Multiple	No Comment
B	SRV4a-t	Multiple	STDC agrees
B	SRV5a-oo	Multiple	No Comment
B	SRV6a-f	Multiple	STDC agrees
B	SRV7a-c	Removed	STDC agrees
B	SRV7d-o	Multiple	No Comment
C	ALL C-D	Multiple	STDC agrees

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Thank you for the opportunity to provide feedback on the proposed changes. Please feel free to contact me if you should have any questions on the contents contained herein or would like additional clarification/information. We look forward to continuing to engage with OCS as you proceed through the revision process.

Sincerely,

A handwritten signature in blue ink, reading "Juan E. Rodriguez". The signature is fluid and cursive, with the first name "Juan" and last name "Rodriguez" clearly legible.

Juan E. Rodriguez
Executive Director