



Texas Association of Community Action Agencies, Inc.
1250 S. Capital of TX Hwy, Building 3, Suite 400
Austin, TX 78746

June 21, 2024

Dr. Lanikue 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

**Re: Proposed Information Collection Activity; Community Services Block Grant (CSBG)
Annual Progress Report (Office of Management and Budget No. 0970-0492)**

To Dr. Howard and the Office of Community Services:

Texas Association of Community Action Agencies (TACAA) appreciates the opportunity to comment on the DRAFT Federal Annual Report Guidance, released for public comment on April 22, 2024. TACAA strongly supports the intent of the Annual Report changes to establish streamlined requirements for calculating and reporting outcomes and services associated with Community Services Block Grant activity. In advance, TACAA thanks OCS Staff for considering our comments stated here and anticipated comments on possible revisions to the guidance Federal Register Notice #2.

Background on TACAA

The Texas Association of Community Action Agencies, a 501(c)(3), provides a unified voice for Community Action Agencies across Texas. TACAA advocates for Community Action Agencies on the state, regional, and national levels. Through our statewide association of local agencies, TACAA has one of the state's largest networks directly supporting low-income families in Texas.

The Texas Network of Community Action Agencies has deep expertise in addressing the causes and conditions of poverty through local programs and partnerships designed to move families and

communities toward economic progress and independence. For six decades, we have worked together to make Texas a better place to live, work, and do business. Proposed changes to the way that Texas reports on its effectiveness may threaten the network's ability to serve Texas communities and the Texans who live in them.

General Comments

TACAA would like to express its support of the OCS in establishing a thorough task force to review the data collection framework and reporting requirements. This aligns with Dr. Howard's promise to the Network in Year 1, to intensely review the data collected and reported. The hours spent on office visits, state office tours, and local engagement across the United States have informed many of the developments captured in Annual Report 3.0.

Feedback and Recommendations to CSBG Annual Report 3.0

1. The quality of the information to be collected.

Poor data quality collectively threatens each Community Action Agency and the entire network. Decision makers may lose confidence when unclear data hides an agency or state's accomplishments or obscures progress. Finally, efforts based on poor data fails to recapture previous support or attract new support. This network has sustained itself through federal transitions and state changes, yet the threat of dissolution, funding restriction, and reduction remains imminent.

TACAA recommends that OCS reconsider several data points removed in Annual Report 3.0. The removal ignores essential elements of Community Action's service delivery but also weakens attempts to fully capture the scope and impact of Community Action's effort. For example, in Annual Report 3.0, Module 3 – Individual Level, the sources of income are now excluded from reporting. To qualify a household for eligibility, a CAA entity is required to collect all sources of income. The community submits documentation, and the entity collects sources of income, analyzes, and determines eligibility, but based on Annual Report 3.0, it will not capture the time invested and the outcome of that effort from both the household applicants and the Agency. This is seemingly an unclosed loop.

Continuing to document the sources of household income better informs the report. It demonstrates the inequity between income and well-being for many working-poor families, an important narrative in policymaking around systemic issues and systemic solutions.

2. The clarity of the information to be collected.

To minimize the burden associated with individual interpretation and data collection, TACAA strongly recommends the following actions:

- Publishing the data specification well in advance of the collection, ensuring enough time for changes to systems and operational processes for implementation, testing, and completion. TACAA is concerned with the timeline required to fully implement Annual Report 3.0. The concern is heightened by the fact that each Texas CAA has its own reporting system(s), which are deeply integrated into its operational systems to achieve maximum efficiency.
- Publishing high-quality, timely documentation/tools that are clear, unambiguous, and easy to navigate. State Administrators and/or Associations should not be required to individually interpret the definition of each revised or new standard. Finally, it is important to note that without OCS enforcing uniformity across state administrators who are responsible for data implementation and oversight, the network of local entities will not maintain quality in the data collection process.
- Supporting the specification through the provision of high-quality in-person training and webinars.

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

TACAA recognizes OCS's effort to evaluate and reduce the activities above and beyond business as usual necessary to meet external data requirements, also known as data burden. One critical factor in evaluating the data burden, which may have been neglected in the review process of Annual Report 3.0, is the significant impact of a state's discretion in performance reporting requirements imposed on the subgrantees/CAAs.

It is important to note that Texas has requirements on Federal Grants, including CSBG, in which an entity must submit a monthly report and, at grant close, a final report each that captures metrics and data points outlined in the Annual Report Module 4. Texas entities, and possibly other network entities, will not realize the intended outcome of reducing the burden imposed by data collection. Instead, the frequency of reporting required by State Administrators will continue to impose a significant investment of time and resources.

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

TACAA has reviewed the Annual Report 3.0 and concluded that specific areas aimed at reducing data burden may concurrently impair the report's purpose as stated in the CSBG Act, resulting in the loss of significant, relevant, and necessary data points. These data points serve to raise the impact of the community action agencies and their effective work to address the complexities of poverty.

With the removal of data points in Annual Report 3.0, TACAA is requesting clarity on OCS's intention to capture the same relevant information either (1) through inclusion in new performance indicators or (2) through derivations or computations from existing data sets.

Where OCS has determined that a data point (FNPI and SRV) is no longer relevant to the Annual Report, TACAA requests specificity regarding the determination that led to its complete deletion from the annual report. For example, several employment FNPIs are eliminated, including those that demonstrate gainful employment and retention as a result of Community Action intervention. The clarity requested is how OCS concluded that gainful employment and retention are no longer substantial/significant/beneficial measures for congressional reporting.

5. Does the information to be collected produce a 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.

TACAA expects the change in the reporting year to be a significant burden to implement. Without funding for system improvements at the state and agency levels, this shift in behavior, fiscal management, and expected reporting in the next 24 months will significantly affect existing systems. TACAA requests that OCS provide clarity on the Federal Fiscal Year reporting standard. Specifically, how will misalignment in timing be explained or treated in congressional reports? The Federal Fiscal Year period, compared to the block grant award period versus the CAA contract period, each has three distinct, noncongruent schedules and timelines. Local agencies currently plan programs and forecast performance results on a calendar basis, which aligns with the flow of funding, typically a calendar year. Will states and local agencies be expected to adjust planning, budgeting, community engagement, and performance expectations to align with the Federal Fiscal Year?

Again, Texas Association of Community Action Agencies (TACAA) appreciates the opportunity to comment on the DRAFT Federal Annual Report Guidance, released for public comment on April 22, 2024. TACAA is hopeful to receive feedback and comments on points of clarity submitted. TACAA strongly supports the intent of the Annual Report changes to reduce the burden, embolden the story of Community Action, and enhance reporting across the states and Network.

Thank you,



Amanda Shelton
Executive Director

Texas Association of Community Action Agencies