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GAVIN NEWSOM
GOVERNOR

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VIA ELECTRONIC MAIL ONLY

Richard L. Revesz
Administrator
Office of Information & Regulatory Affairs
Office of Management & Budget
725 17th Street NW
Washington, DC 20503

Re: Submission for Office of Management and Budget (OMB) Review; Community Services Block Grant (CSBG) Annual Progress Report (OMB No. 0970-0492) [FR Doc. 2024-23271]

Greetings Mr. Revesz:

On October 9, 2024, the Office of Community Services' ("OCS") Administration for Children and Families ("ACF") posted a Submission for Office of Management and Budget (OMB) Review; Community Services Block Grant (CSBG) Annual Report (OMB No. 0970-0492) ("FRN") to the Federal Register in Volume 89, No. 196, Office of Management and Budget (OMB) # 0970-0492, pages 81918-81919 providing a final opportunity for comment on the proposed revisions to the CSBG Annual Report. The Department of Community Services and Development ("CSD") has reviewed the FRN, ACF-OCS-CSBG-DCL-25-01 ("DCL-25-01") and associated materials to assess the necessity, quality, clarity, and potential burdens of the proposed changes.

CSD is designated by the Governor as the state lead agency responsible for administering the CSBG program in California. There are currently 60 private nonprofit and local eligible entities across California receiving CSBG funds. This network of eligible entities continues to administer programs that assist low-income individuals and families with attaining the skills, knowledge, and motivation necessary to achieve self-sufficiency.

CSD is pleased to work in collaboration with the California network of local providers and our State Association partner, the California Community Action Partnership Association (CalCAPA) during the review process. Following a review of the proposed responses to OCS of our state network and CalCAPA as well as those of national partners such as the National Association of State Community Service Providers (NASCSPP), the National Community Action Partnership (NCAP), Community Action

Program Legal Services, Inc. (CAPLaw), and the Association of Nationally Certified ROMA Professionals (ANCRT) CSD confirmed its alignment with many of the noted recommendations, including those regarding FNPI Outcome Descriptions, transition to the FFY calendar for annual reporting, change to number sequencing for Modules 3 and 4, 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 key feedback identified during CSD's review of the revised Annual Report 3.0 framework 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 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: 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 should be determined. 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 and services 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 to allow agencies to highlight their unique, impactful methods to 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 the way in which 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 greatest a degree possible, allowances to accommodate this burden should be made.

Implementation Timeline

In the release of the initial Annual Report 3.0 framework on April 22, 2024, The Timeline for Implementation and Reporting section of DCL-24-09 noted that the utilization of the Annual Report 3.0 Framework, "...will become required for the FY2025 CSBG Annual Report (due March 31, 2026)." The FRN posted on October 9, 2024 states that the updated framework will, "...begin as an option for use in Fiscal Year (FY) 2026 and to be required beginning in (FY) 2027."

Recommendation: CSD commends OCS' efforts to make provisions for the

inevitable administrative burden that will accompany the implementation of the new Annual Report framework. Providing additional time to allow agencies to perform the necessary program updates as well as the technical, logistical, and administrative tasks required will help ensure the smoothest transition possible.

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 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 on line C.6 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 Network feedback to determine if the estimated technical costs of implementing this change outweigh the benefit of this change to 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

- CSD has always seen the value of network engagement and collaboration and encourages OCS to identify opportunities to benefit from the insights of CEEs, state and national associations, state lead agencies, and other CSBG partners in the development of this crucial requirement.
- While many FNPI and SRV descriptions have been updated in the revised Annual Report framework, several descriptions still 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 and training 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, these manuals should include definitions and validation examples 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
Chief Deputy Director