



December 2, 2019

Administration for Children and Families
Office of Planning, Research, and Evaluation
330 C Street SW
Washington, DC 20201

Re: Proposed Information Collection Activity; Community Services Block Grant (CSBG)
Annual Report (OMB No.: 0970-0492)

OPRE Reports Clearance Officer:

We are writing as members of the Community Action Network to address the proposed information collection entitled, “Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Report (OMB No.: 0970-0492), which was published in the Federal Register on October 2, 2019.”¹

The Community Action Partnership (Partnership) is the national membership association and hub that links the nation’s more than 1,000 Community Action Agencies (CAA).² Its mission is to “ensure that the causes and conditions of poverty are effectively addressed and to strengthen, promote, represent and serve its Network of member Agencies.”³ CAAs cover 99% of counties in 50 states, the District of Columbia, and Puerto Rico, and touch the lives of 15 million low-income individuals, 6.2 million families, and 3.9 million children.⁴

Community Action Program Legal Services, Inc. (CAPLAW) provides the legal, governance, and management resources necessary to sustain and strengthen the national CAA network. Its consultation, training, and resources allow CAAs to operate legally sound and well-governed community organizations.

¹ Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Report (OMB No.: 0970-0492, 84 Fed. Reg. 52506 (proposed Oct. 2, 2019).

² *About Us*, Community Action Partnership, <https://communityactionpartnership.com/about-us/> (last visited Sept. 16, 2019).

³ *Mission & Promise*, Community Action Partnership, <https://communityactionpartnership.com/mission-and-promise/> (last visited Sept. 16, 2019).

⁴ National Impact Report, Community Action Partnership at 5 (2019), available at https://communityactionpartnership.com/wp-content/uploads/2019/02/CAP-Report-2.26.19-revised_MOBILE.pdf.

Each of our member agencies receive funds through the CSBG and report information about their activities to the state and federal government as part of the CSBG Annual Report. This engagement gives our organizations unique insight into the substantive and procedural aspects of that reporting, which is the subject of this public submission.

Collecting information for the CSBG Annual Report is crucial to the efficacy and accountability of our organizations. It identifies how effectively we are serving our communities and how we might be able to serve them better. However, the frame and scope of a question can magnify different narratives in a data set and we are committed to supporting a process that yields the most accurate representation of our network as a whole. With that commitment in mind, the comments in this public submission address issues apparent in the proposed collection that we believe could lead to an imprecise or incomplete Annual Report.

I. Background

The Community Services Block Grant Act (the Act) requires each state to report annually to the Department of Health and Human Services (HHS) on the performance of the state and CSBG-eligible entities within that state.⁵ The Act also requires HHS to submit an annual report to Congress summarizing allocated CSBG funds and the impact of those funds on clients in served communities.⁶ In early 2017, the Office of Management and Budget (OMB) authorized the Office of Community Services (OCS) to collect CSBG Annual Report information for three years, expiring on January 31, 2020.⁷ OCS separated the Annual Report into four modules: state administration; CSBG eligible entity expenditures, capital, and resources; community level information; and individual and family information.⁸

On October 2, 2019, OCS published a proposal to continue annual report information collection and disseminated proposed changes to the questions presented in the modules.⁹ Along with the proposed changes, OCS specifically requested comments on the following topics: “(a) whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the accuracy of the agency’s estimate of the burden of the proposed collection of information; (c) the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden including through the use of automated collection techniques or other forms of information technology.”¹⁰

This public submission addresses the Community Action network’s concerns with some of the proposed changes as well as its support for others. We believe adoption of the suggestions

⁵ Community Services Block Grant Act, Pub. L. No. 105-285, sec. 201, § 678E(a)(2), 112 Stat. 2729, 2746 (1998) (codified as amended at 42 U.S.C. § 9917(a)(2)).

⁶ *Id.* at § 678E(b)(3) (codified as amended at 42 U.S.C. § 9917(b)(3)).

⁷ Office of Community Services, U.S. Dept. of Health and Human Services, Information Memorandum No. 152, Community Services Block Grant Annual Report (2017) at 1.

⁸ Community Services Block Grant (CSBG) Annual Report, Administration for Children and Families, OMB Control No: 0970-0492, available at

https://www.acf.hhs.gov/sites/default/files/ocs/rpt_csbg_annual_report_final.pdf.

⁹ 84 Fed. Reg. 52506; Community Services Block Grant (CSBG) Annual Report 2.0, Administration for Children and Families, OMB Control No.: 0970-0492, available at

https://www.acf.hhs.gov/sites/default/files/ocs/attachment_a_csbg_annual_report_fr1_fy2019.pdf.

¹⁰ 84 Fed. Reg. 52506.

herein will yield a more effective data collection process and an Annual Report that more accurately represents the qualities of our network.

II. Necessity and Practical Utility of Information to be Collected

The proposed collection of information is necessary and beneficial for OCS to perform its function as a liaison to the Community Action network. Accurate, representative reporting of quality data is crucial to the continued success of Community Action. The CSBG Annual Report provides vital data about our network to local CAAs, state associations, state CSBG lead agencies, and national partner organizations that not only demonstrates successes, but identifies areas where the network can improve the provision of assistance and services to families and communities.

Although Module 1 is the main focus of this proposed information collection, we believe that aspects of Modules 2, 3, and 4 would also benefit from modifications. We are committed to working with OCS and other stakeholders in a future information collection to solicit feedback from the network on updates to these Modules, which will yield a more accurate and inclusive representation of the positive effects CSBG funds have in our communities.

III. Accuracy of Burden Estimate

OCS's estimate of the burden of the proposed collection of information on respondents is generally accurate, with the exception of two issues of concern. First, the proposal's burden estimate is partially based on the agency's assertion that there are 1,035 eligible entity respondents. However, the most recent CSBG Annual Report to Congress identifies 1,026 eligible entities.¹¹ In light of this discrepancy, we believe the annual burden for eligible entities should be reduced to 246,469 hours in order to reflect this reduction. Second, the additional questions proposed in the information collection will increase the burden on both states and eligible entities and, as such, the average burden hours per response should be increased to reflect this additional burden.

IV. Quality, Utility, and Clarity of Information to be Collected

Ensuring the quality, utility, and clarity of the questions presented and data collected through the CSBG Annual Report process is paramount. While we appreciate the willingness of OCS to adjust and update the questions in the reporting modules, we believe that the following Module 1 proposals require further study or present unnecessary challenges:

a. Module 1 § A.2

Section A.2 requires a state's CSBG lead agency to report programs the agency administers in addition to CSBG. Although four additional program options are listed as well as

¹¹ Office of Community Services, Dept. of Health and Human Services, Community Services Block Grant: Report to Congress, Fiscal Year 2015 at 12 (2015), available at <https://www.acf.hhs.gov/ocs/resource/csbg-report-to-congress-fy-2015>.

an “Other” option to include unlisted programs, we believe that more programs should be added, including, but not limited to, the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF); Head Start and Early Head Start; the Community Development Block Grant (CDBG), and the Social Services Block Grant (SSBG). Including these options will lead to more specific reporting on additional programs administered by CSBG lead agencies and create a more complete national data set on state lead agency program portfolios.

b. Module 1 § D.2

Section D.2 requires states to report the quantity of CSBG eligible entities in the state that met all state-adopted organizational standards. The information is reported in a table that requires states to breakdown how many eligible entities met 100%, 90%-99%, 80%-89%, and 70%-79% of the organizational standards, respectively. The proposed collection adds one additional row, requiring states to report the number of eligible entities that met less than 69% of the state organizational standards. Although we do not oppose the addition of the new percentile reporting, OCS should clarify this proposed change for the network, specifically why it believes reporting the lower percentile is necessary.

c. Module 1 § D.3

Section D.3 requires states to report on their response to unmet organizational standards. In the current CSBG Annual Report, states must disclose how many eligible entities with unmet organizational standards were placed on Technical Assistance Plans (TAP) as well as how many were given Quality Improvement Plans (QIP). The new proposal removes QIP reporting from this section, making section H on Monitoring, Corrective Action, and Fiscal Controls where states report on QIPs. We support this removal as it more accurately reflects the way in which the Community Action network operates.

d. Module 1 § E

Section E requires states to report on the use of CSBG funds, including allocations, obligations, and expenditures.¹² The current proposed information collection includes changes to multiple subsections of section E, including updated financial categories and explanations.¹³ The network is concerned that including these adjustments without clarification regarding their inclusion will dilute the purpose of the Annual Report to serve as an accurate reflection of the Community Action network’s performance.

Of particular concern is Section E.10, which requires states to report on the unobligated balance for the federal fiscal year. The proposed collection attempts to align this reporting requirement with the unobligated balance of federal funds in other federal financial reports. We are concerned that this will decouple federal spending reporting from measurable CSBG outcomes because federal grants are on a 24-month timeline. The report was established, in part, to provide a clear picture of the direct outcomes of CSBG allocations and the integrity of the

¹² Community Services Block Grant (CSBG) Annual Report, Administration for Children and Families, OMB Control No: 0970-0492, 10-14, available at https://www.acf.hhs.gov/sites/default/files/ocs/rpt_csbg_annual_report_final.pdf.

¹³ Office of Community Services, U.S. Dept. of Health and Human Services, CSBG-DCL-2020-02, CSBG Annual Report: 60 Day Open Comment Period, Attachment A at 9, available at https://www.acf.hhs.gov/sites/default/files/ocs/attachment_a_csbg_annual_report_fr1_fy2019.pdf.

report will be compromised if spending and demographic outcomes are misaligned. While we understand that OCS is attempting to align the CSBG Annual Report with other instances of federal financial reporting¹⁴, we believe all stakeholders would benefit from a more deliberate revision process.

To that end, we urge that no changes be made to Section E during the current OMB clearance process and that OCS form an advisory committee including members of stakeholder organizations to research what changes to the financial disclosure section, if any, are necessary for OCS to fulfill its obligations. At a minimum, we urge OCS to immediately convene stakeholders to solicit feedback on how to address these issues prior to the 30-day clearance period to solicit comments from the public to OMB.

e. Module 1 §§ H.4-5

Section H of the Annual Report deals with monitoring and corrective action. The proposed changes convert the current sections H.4 and H.5 concerning QIP reporting into H.4a and H.4b and adds a new section H.5 to address the use of TAPs. To better align with section 678C of the Act, which gives the state the option to also provide training and technical assistance (T/TA) to an eligible entity as part of a corrective action process¹⁵, we recommend deleting Section H.5, renumbering Section H.4 so that H.4a is H.4b and H.4b is H.4c, and adding Question H.4a to address T/TA provided in connection with a QIP. We also recommend asking a threshold question that would allow states without any eligible entities on QIPs during the reporting period to skip the sub-questions in this section. We recommend revising Section H.4 as follows:

H.4. Reporting Quality Improvement Plans (QIPs)

Were any CSBG eligible entities on a Quality Improvement Plan during the reporting period?

- ☐ Yes
- ☐ No

[If the state checks YES, the state should proceed to answer questions H.4a, H.4b, and H.4c. If the state checks NO, it can skip the remaining questions addressing QIPs]

H.4a. Training and Technical Assistance (T/TA): Did the state offer T/TA to eligible entities in connection with a Quality Improvement Plan (QIP)?

- ☐ Yes
- ☐ No

¹⁴ Office of Community Services, U.S. Dept. of Health and Human Services, CSBG-DCL-2020-02, CSBG Annual Report: 60 Day Open Comment Period, Attachment B at 2, available at https://www.acf.hhs.gov/sites/default/files/ocs/attachment_b_ar_revisions_summary.pdf.

¹⁵ Pub. L. No. 105-285, sec. 201, § 678C, 112 Stat. 2729, 2743-4 (1998) (codified as amended at 42 U.S.C. § 9915).

H.4b. Quality Improvement Plans (QIPs): Did all CSBG eligible entities on Quality Improvement Plans resolve identified deficiencies within the schedule agreed upon by the state and eligible entity?

- Yes
- No

H.4c. Reporting QIPs: Did the state report all CSBG eligible entities with serious deficiencies from a monitoring review to the Office of Community Services within 30 calendar days of the state approving a QIP?

- Yes
- No

f. Module 1 § H.6

CSBG eligible entities are required to submit their annual audits to the Federal Audit Clearinghouse (FAC).¹⁶ The state must review each audit and, if there is an audit finding related to the program or questioned costs, issue and report a management decision.¹⁷ State accountability measures issued by OCS require states to report on whether and when any management decisions were issued.¹⁸ The proposed information collection adds a yes/no question that reads as follows: “Did the state have Single Audits in the Federal Audit Clearinghouse during this reporting period?” We oppose the inclusion of this question because all eligible entities are legally required to submit audits to the FAC in each reporting period. Essentially, owing to state accountability requirements, the answer to this question should never be “No,” and the question should, therefore, be removed.

V. Minimizing Burden of Information Collection on Respondents

Frictionless reporting processes are essential to an accurate, comprehensive CSBG Annual Report. We support the past and current initiatives by OCS and the National Association of State Community Services Programs (NASCSPP) to streamline the process through online reporting. Continued training for eligible entities, state associations, and state offices on reporting requirements and processes will also reduce burdens on information collection. Finally, we believe that accepting the suggestions in this public submission, especially increased clarity on financial reporting terms and requirements, would make the reporting process less burdensome for all respondents.

VI. Conclusion

The CSBG Annual Report is fundamental to the Community Action network’s ability to provide effective assistance and services to our communities. Our investment in the quality,

¹⁶ 45 C.F.R. § 75.512.

¹⁷ 45 C.F.R. § 75.521.

¹⁸ Office of Community Services, U.S. Dept. of Health and Human Services, Info. Memorandum No. 144, State and Federal Accountability Measures and Data Collection Modernization, Attachment B, 4Sd (2015), available at https://www.acf.hhs.gov/sites/default/files/ocs/appx_2_csbgs_state_accountability_measures_10022015.pdf.

accuracy, and completeness of that report has prompted us to review the proposed changes and request the adjustments set forth in this public submission.

OCS has a history of productive collaboration with the Community Action network on significant issues including CSBG data collection and accountability mechanisms. We believe that renewed cooperation is essential to meet the needs of not just Congress and OCS, but states and agencies as well. The undersigned organizations appreciate the opportunity to be a part of the dialogue surrounding CSBG issues and look forward to working closely with OCS and other members of the Community Action network to identify solutions that work for all parties and ensure a timely clearance reauthorization.

Sincerely,



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Executive Director & General Counsel
CAPLAW

Virginia Community Action Partnership
Community Action for Improvement, Inc.
Pace Community Action Agency, Inc.
Community Action Association of Pennsylvania
Jefferson County Community Action Council, Inc.
Nevada Community Action Association
Community Action Partnership of New Jersey
Fayette County Community Action Agency Inc.
Kentucky Communities Economic Opportunity Council
Community Action Agency of Somerville, Inc.
Community Action Planning Council of Jefferson County, Inc.
Northcentral Arkansas Development Council, Inc.
Action Inc. of Gloucester, MA
Community Renewal Team, Inc. of Hartford, CT
Brightpoint, Inc. of Fort Wayne, IN
Community Action Marin
Community Action Partnership for Dutchess County, Inc.
Cattaraugus Community Action, Inc.
Community Action Partnership Association of Idaho
Community Action Partnership of Orange County
Community Action Partnership of Lewiston, ID
Community Action of Nebraska
Community Action Agency of Southern New Mexico

Capstone Community Action of Vermont
Opportunities for Otsego
Great Lakes Community Action Partnership
Solutions that Empower People, Inc. of Virginia
Blueprints of Pennsylvania
Total Action for Progress
Clinch Valley Community Action, Inc.
Pittsburgh Community Services, Inc.
Supporting Transformational Opportunities for People, Inc.
Bucks County Opportunity Council, Doylestown, PA
Northeast Iowa Community Action Corporation, Decorah, Iowa
Economic Opportunity Council of Suffolk County, NY
Montgomery County Community Action Development Commission
Commission on Economic Opportunity, Wilkes-Barre, PA
Northern Tier Community Action Corporation
Project Discovery of Virginia
New River Community Action, Radford, VA
People Incorporated of Virginia
Multi-Service Center of Washington State
Northeast Kentucky Community Action Agency
Connecticut Association for Community Action
Lincoln Hills Development Corporation, Indiana
Ohio Association of Community Action Agencies
New York State Community Action Association
New Jersey Association on Correction
Central West Virginia Community Action, Inc.
L.K.L.P. Community Action Council
Pro Action of Steuben and Yates, Inc.
Grow South Dakota
INCA Community Services, Inc.
Mountain Heart Community Services, Inc.
Oakland Livingston Human Service Agency
Will County Center for Community Concerns
Community Action Agency of Greater Kansas City
Mid Michigan Community Action Agency, Inc.
Citizens for Citizens, Inc.
Community Action Association of Alabama
Philadelphia Office of Community Empowerment and Opportunity
Sandhills Community Action Program, Inc.
Massachusetts Association for Community Action
District 4 Human Resources Development Council of Montana
CAP Services, Inc. of Wisconsin
EnAct Community Action Agency of West Virginia
Tri County Community Action of Pennsylvania
I-CARE, Inc. of North Carolina
Maryland Community Action Partnership

Community Action Partnership of San Luis Obispo County, Inc.
Northern Kentucky Community Action Commission
Community Action Partnership of Dickinson, North Dakota
Western Illinois Regional Council & Western Illinois Community Action Agency
Wabash Area Development, Inc.
Wayne Action Group for Economic Solvency, Inc.
Central Piedmont Community Action, Inc.
Coastal Community Action, Inc. of North Carolina
C.E.F.S. Economic Opportunity Corporation
Sangamon County Community Resources
Tri-County Opportunity Council of Illinois
Davidson County Community Action, Inc. of North Carolina
Texas Association of Community Action Agencies, Inc.
Community Action Agency of Butte County, Inc.
Indiana Community Action Association
Community Services Agency, Reno, NV
Charlotte Area Fund, Inc.
South Plains Community Action Association, Inc., Levelland, TX
Okanogan County Community Action Council, Okanogan, WA
Action Pathways Inc., Fayetteville, NC
Blue Grass Community Action Partnership, Frankfort, KY
Community Action Agency of St. Louis County, Inc., St. Louis, MO
Community Action Partnership-Minot Region, Minot, ND
Union County Community Action, Inc., Monroe, NC
McHenry County Housing Authority, Woodstock, IL
Illinois Valley Economic Development Corporation, Gillespie, IL
St. Clair County Illinois Community Action Agency
Action for Eastern Montana
Western Egyptian Economic Opportunity Council, Steeleville, IL
Interlocal Community Action Program, New Castle, IN
Choanoke Area Development Corporation, Rich Square, NC
Mississippi County, Arkansas, Economic Opportunity Commission, Inc.
Inter-Lakes Community Action Partnership, Madison, SD
Central Missouri Community Action
Central Florida Community Action Agency
Champaign County Regional Planning Commission, Urbana, IL
Southeastern Association of Community Action Agencies
North Carolina Community Action Association
Michigan Community Action
West Virginia Community Action Partnerships, Inc.
NeighborImpact, Redmon, OR
Salisbury-Rowan Community Action Agency, Inc.
Mountain Projects Community Action Agency, Waynesville, NC
Montana Community Action Partners
Yadkin Valley Economic Development District, Inc., Boonville, NC
Wisconsin Community Action Program Association

Dubois Pike Warrick Economic Opportunity Committee, Jasper, IN
Rural Alaska Community Action Program
Montgomery County, Maryland Community Action Board
Community Action Kentucky
Southeastern Community & Family Services, Inc., Lumberton, NC
Eastern West Virginia Community Action Agency
Northwest Indiana Community Action
Adirondack Community Action Programs, Inc.
Monterey County Community Action Partnership, Salinas, CA
Fresno Economic Opportunities Commission
Embarras River Basin Agency, Inc., Greenup, IL
Community Action Council of Lewis, Mason, and Thurston Counties, Washington
Community Service Programs of West Alabama, Inc.
Rooftop of Virginia Community Action Program, Inc.
Peoria Citizens Committee for Economic Opportunity, Inc.
MAHUBE-OTWA Community Action Partnership, MN
Community Action Agency of Anne Arundel County, MD
East Central Illinois Community Action Agency
Community Action Partnership of Riverside County, CA
Community and Economic Development Association, Chicago, IL
North Central West Virginia Community Action
Community Resources, Inc., Parkersburg, WV
Greater Lawrence Community Action Council, Inc., Lawrence, MA
Minnesota Community Action Partnership
Southwest Michigan Community Action Agency
Community Action Committee of the Lehigh Valley, Inc.
Tri-County Community Action Agency, LaGrange, KY
Community Action Pioneer Valley, Greenfield, MA
Blue Mountain Action Council, Walla Walla, WA
Washington State Community Action Partnership
Kansas Association of Community Action Programs
The Agriculture and Labor Program, Lake Alfred, FL