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June 17, 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)

Dr. Howard,

On behalf of the National Community Action Partnership (NCAP), thank you for the opportunity to provide public comments on the proposed changes to the information collection for the Community Services Block Grant (CSBG) Annual Report, entitled “*Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Progress Report (Office of Management and Budget No. 0970-0492)*,” which was published in the Federal Register on April 22, 2024.¹

NCAP serves as the national membership association and hub that links over 1,000 Community Action Agencies (CAA) and State Associations across the country.² Our mission is “*To ensure the causes and conditions of poverty are effectively addressed and to strengthen, promote, represent, and serve the Community Action Network.*”³ NCAP is the national center for training and innovation within the CAA Network and serves as a trusted convener, trainer, and resource for local agencies and state/regional associations. With over 120 years of combined experience at the local, state, and national levels, our staff are national experts in Community Action issues, priorities, and mission alignment.

Our comments begin with an overview of the submission, followed by sections addressing the background and importance of

¹ Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Progress Report (Office of Management and Budget No. 0970–0492), 89 Fed. Reg. 29,339 (April 22, 2024).

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).

the CSBG Annual Report, NCAP's role as a significant stakeholder in the integrity of the CSBG Annual Report process, and our support for and opposition to various proposed changes, our responses to which have been separated into the categories identified by OCS in the public notice, namely: burden levels and estimates, the quality and clarity of data to be collected, and general recommendations. NCAP's comments are the culmination of an interactive engagement process, which included feedback from the CSBG Annual Report Advisory Group, (a diverse group representing CAAs, State Associations, and National Partners); a virtual public feedback forum held on May 29, 2024, an in-person feedback forum held on June 5, 2024; a Network-wide survey; and ongoing engagements with our members.

I. Overview of NCAP Comments

On April 22, 2024, OCS published a proposal in the Federal Register to continue collection of the CSBG Annual Report data through an updated version of the current information collection with minor changes for use by the Community Action Network (Network) over the next two years (Version 2.1); and proposed significant changes to the CSBG Annual Report for implementation in Federal Fiscal Year 2026 (Version 3.0). Along with the proposed changes, OCS specifically requested comments on the following:

1. Whether the proposed collection of information is necessary for the proper performance measurement of Federal, State, or local agencies.
2. The quality of the information to be collected.
3. The clarity of the information to be collected.
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?
5. The accuracy of the agency's estimate of the burden of the proposed collection of information?
6. What, if any, additions, revisions, or modifications to the information collection would you suggest?⁴

Our response aims to ensure that the CSBG Annual Report continues to serve as a valuable tool for demonstrating the efficacy and impact of the Network in fulfilling the purposes of the CSBG Act (the Act). The following highlights summarize priority comments, recommendations, and concerns based on what NCAP has heard from the Network:

- **Fulfilling CSBG Act Requirements:** The Act outlines key purposes of CSBG to be executed by the Network at the local level which include "*to provide assistance to States and local communities, working through a network of community action agencies and other neighborhood-based organizations, for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient[.]*"⁵ OCS should

⁴ 89 Fed. Reg. at 29,340.

⁵ Community Services Block Grant Act, 42 U.S.C. § 9901(1).

ensure that the proposed changes to the CSBG Annual Report are reflective of and clearly tie to all components of these purposes.

- **Meaningful Engagement:** The current process limited the Network's input due to OCS' timing and lack of proactive communication regarding the changes. NCAP recommends that OCS engage meaningfully with the Network by releasing updates in a timely manner, considering CAAs' capacity to engage, and allowing enough time for feedback and co-creation of revisions that align with the array of needs assessed through unique community assessments by the 1000+ CAAs. We believe that this exchange of input should occur prior to the final clearance of Version 3.0.
- **Balancing Burden and Quality:** It is crucial that OCS strike a balance in the proposed revisions that reduces reporting burdens while maintaining the data quality necessary to accurately showcase the impact of CAAs and meets the statutory requirements of the Act.
- **Promote Local Flexibility:** The Act supports the local flexibility and impact of CAAs and NCAP recommends that OCS avoid changes to reporting that will discourage or increase the difficulty of reporting the unique effort and impact of each local agency.
- **Reflection of Community Action:** The CSBG Annual Report should accurately represent and reflect the broad and diverse impacts of the Network in fulfilling its statutory purpose in addressing poverty, revitalizing communities, and empowering self-sufficiency; as well as represent and reflect the Network's outcomes orientation.
- **Risk of Underreporting:** NCAP is concerned about the potential underreporting of outcomes due to the proposed changes. With significant reductions of indicators and services, the proposed CSBG Annual Report Version 3.0 may not adequately capture the full scope of CAAs' efforts.
- **Resource Allocation:** NCAP recommends that OCS allocate additional resources towards training, costs associated with updates to software systems, and ongoing technical assistance to support the successful implementation of the revised report.

II. The CSBG Annual Report is a crucial tool for addressing both the causes and conditions of poverty

Established as part of the War on Poverty in 1964, the Network emerged from the Economic Opportunity Act which was designed to build grass-roots capacity to assess and implement solutions to local causes and conditions of poverty and make the entire community more responsive to the needs and interests of persons with low incomes—all with the use of federal resources. Although the administration of the funding and oversight have evolved since the inception of Community Action, the purpose of the funding remains the same – CSBG serves as core federal funding that is leveraged along with state, local, and, private funding to coordinate a wide range of local strategies and critical services to alleviate poverty, revitalize low-income communities, and empower individuals and families with low incomes. This approach to addressing poverty is a statutory requirement and the central mission for CAAs after nearly sixty years. **The proposed changes in Version 3.0 of the CSBG Annual Report include more transactional services and outcomes (such as those related to receipt of service alone) or exclude transformational services and outcomes (such as those related to a change in status as a result of services) which undermine local CAA flexibility and impact. It is imperative that OCS preserve the fidelity of local CAA flexibility and impact.**

The Act requires the Department of Health and Human Services (HHS) to prepare and submit an annual report to Congress outlining the activities and performance outcomes achieved through CSBG funding.⁶ Specifically, the report must include information on how the funds were utilized, the number and characteristics of low-income individuals served, performance measurements for both states and local CAAs, and the impact of the services provided.⁷ HHS compiles the annual report using data collected and reported by local CAAs and State CSBG Offices before submitting the report to the congressional committees of jurisdiction.⁸

After remaining unchanged for over a decade, OCS requested a significant revisions to the CSBG Annual Report in late 2016, which was approved by OMB on January 12, 2017.⁹ Since then, OCS has submitted subsequent information collection requests (ICR) proposing minor changes to the data being collected in the report. The first two received OMB approval on February 28, 2020, and November 23, 2020, and the most recent ICR, approved on June 29, 2021, expires on June 30, 2024.¹⁰

While the main purpose of the report is to keep Congress apprised of the block grant's performance, the CSBG Annual Report serves a myriad of purposes beyond merely complying with statutory reporting requirements. State CSBG Offices use the report in their oversight roles to monitor and evaluate the performance of CAAs, ensuring that funds are used effectively to fulfill the purposes of CSBG. State Associations also use the data in the CSBG Annual Report to tell the story of the statewide Network, advocating for new programs and policy changes that advance the mission of CSBG and Community Action. For CAAs, the report serves as a critical tool for demonstrating their efficacy in fulfilling the purposes of the Act to reduce poverty, revitalize communities of low-income, and promote self-sufficiency. The Act and OCS guidance require each CAA to engage in a comprehensive triennial assessment of community needs, resources, and partners to be eligible for CSBG funding.¹¹ Part of that assessment includes collection of quantitative and qualitative data on poverty, customer demographics, and key findings on the causes and conditions of poverty in their service area. Collecting detailed performance outcomes, impact data, and demographics of populations served allows CAAs to not only showcase their successes, but also identify areas for improvement and make data-informed decisions to enhance service delivery. In short, the data collected and presented through the annual report process drives the future services and performance of the full Network.

⁶ 42 U.S.C. § 9917(b)(2)-(3).

⁷ *Id.* at § 9917(b)(2).

⁸ The Act has not been updated since 1998, but the current committees of jurisdiction for CSBG are the Committee on Education and the Workforce in the House of Representatives and the Committee on Health, Education, Labor, and Pensions in the Senate.

⁹ Office of Information and Regulatory Affairs, Office of Management & Budget, Executive Office of the President, *OMB Control Number History*, OMB Control Number: 0970-0492, available at <https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=0970-0492#>.

¹⁰ *Id.*

¹¹ 42 U.S.C. § 9908(b)(11); Office of Community Services, Administration for Children and Families, U.S. Department of Health and Human Services, Informational Memorandum No. 138, *State Establishment of Organizational Standards for CSBG Eligible Entities under 678B of the CSBG Act*, 42 U.S.C. § 9914 (2015) at 15.

Therefore, OCS should consider how even seemingly minor changes to the data collection process can have significant consequences, not just for performance measurements, but for the availability of necessary services in communities across the country.

III. NCAP supports a robust regulatory review process for changes to the CSBG annual report information collection request (ICR)

Opportunities for Network engagement in the process to develop updates to the CSBG Annual Report must be rigorous and foster maximum feasible participation. NCAP has significant concerns that the current process, while technically in compliance with minimum federal requirements for information collection requests, has provided insufficient engagement with the Network and, therefore, could yield results that do not accurately reflect the feedback and experiences of those who will be most affected by the changes.

One of the hallmarks of modern policymaking is the evolution from a top-down paradigm to a more inclusive, engaged, customer-driven process. For decades, policymakers made rules for people whose experiences they did not understand who were living in places they had never been – sometimes trying to intuit the needs of impacted populations, but more often willfully or recklessly disregarding the unique needs of communities. As OCS is intimately aware, the maximum participation of impacted populations has been Community Action’s enduring touchstone for over sixty years. Over time, in a prime example of this Network’s innovative capacity, that participation paradigm has become the standard.

In the past, the process for developing and proposing significant changes to CSBG information collections has been intentional, extensive, and deliberative, with all stakeholders playing a crucial role. The ICR that was approved in early 2017 was the result of a process that hinged on deep, intentional engagement with and feedback from the Network to ensure that the report reflected the needs and realities of CAAs and state, regional, and local agencies and partners. By contrast, the current process did not utilize any official Network-wide engagement of impacted parties before the publication of the proposed changes.¹² This resulted in proposed changes that do not fully address the needs and realities of the Community Action Network and may not deliver data demonstrating agencies are meeting the statutory purpose of CSBG. The proposed changes pose significant challenges to the Community Action Network due to a potential increased burden, lack of quality of proposed indicators, and the immediate and long-term risk of significant underreporting of Community Action efforts to meet the three purposes of the Act.

Additionally, during the 2016-2017 ICR process, OCS reviewed comments it received during the initial 60-day comment period for nearly three months before sending the ICR package to OMB, allowing agency reviewers ample time to consider concerns and recommendations. In the current process, OCS has allotted itself only five working days (June 24, 2024, to June 28, 2024) to

¹² OCS states that input was gathered through “one-on-one and small group meetings, site visits, conferences, and training and technical assistance on the CSBG Annual Report,” but these interactions do not allow all impacted parties an equal opportunity for engagement and generates an incomplete record that is not necessarily representative of the full Network. (ACF-OCS-CSBG-DCL-24-09 at 2).

complete comment analysis and consideration of requested changes.¹³ OCS has encouraged interested parties “to submit ... comments as soon as possible, in order to expedite the clearance process,” but optional early submission and review does not mitigate the procedural deficiencies evinced by providing five days for the consideration of public comments.¹⁴

Network concerns with these constricted engagement opportunities led the CSBG National Partners, which included NCAP, CAPLAW, the National Association for State Community Services Programs (NASCS), and the Association of Nationally Certified Results Oriented Management and Accountability Trainers (ANCRT), to articulate these issues in a joint letter to OCS. The CSBG National Partners requested that OCS consider “a revised timeline that accounts for an approach that encourages full and robust comments from the Network, sends a clear message that OCS will take the time necessary to review and fully consider all comments as well as engage the Network in finding solutions for concerns and changes raised before the second Federal Register Notice proceeds.”¹⁵ OCS declined to adjust the timeline, but assured the Network that, “if OCS receives comments that require additional time to review, we will work with our colleagues across ACF, and OMB as needed, to adjust our timeline, while still complying with PRA.”¹⁶ While the timely response from OCS was appreciated, it did not fully address the concerns raised by the National Partners.

The integrity of the CSBG Annual Report ICR process is critical not only for compliance with statutory requirements but also for highlighting the participatory values of Community Action. An opaque development process and restricted engagement opportunities related to this critical component of CSBG administration risk chilling the robust public participation necessary to the evolution of information collections by and about the Network.

Although there are some positive changes, given the number and nature of challenges with the proposed CSBG Annual Report 3.0 and the lack of intentional Network engagement, we ask OCS to consider clearing CSBG Annual Report Version 2.1 and then live into its commitment to “lift up voices from the field” by strategically and robustly engaging Community Action experts prior to the clearance of CSBG Annual Report 3.0. This will allow uninterrupted data collection and provide time for a collaborative revision process that genuinely reduces burden while preserving the report's quality and integrity. We believe OCS and the Network can find creative solutions to the concerns communicated about Version 3.0, which will ultimately yield a stronger information collection tool for use by all parties.

IV. Necessity of information for the proper performance measurement of Federal, State, or local agencies

In general, we agree that the information collected is necessary for the proper performance measurement of state and local agencies, although NCAP noted areas in Module 1 that may not

¹³ *Id.* at 6.

¹⁴ *Id.* at 8.

¹⁵ Memorandum from CSBG National Partners to Dr. Lanique Howard at 2 (May 24, 2024).

¹⁶ Office of Community Services, Administration for Children and Families, U.S. Department of Health and Human Services, Dear Colleague Letter (May 31, 2024).

be necessary for effective performance measurement or statutorily supported and noted proposed streamlining of data points in Modules 3 and 4 to where proper performance measurement may not be possible.

National Program Goals

The CSBG Act identifies three national goals of CSBG: (1) reduce poverty, (2) empower low-income families and individuals to become self-sufficient, and (3) revitalize low-income communities.¹⁷ In a 2019 report, the Government Accountability Office (GAO) described that the existing performance management system did not appear to adequately address these three goals and recommended that the national measures, as collected through the CSBG Annual Report, link to the three goals.¹⁸ In response to GAO's recommendations, OCS restructured its performance measures, which are outlined each year in the budget documents prepared for the congressional appropriations committees.¹⁹ The most recent budget performance measures used by OCS include the following:

- *12A: Increase the number of individuals achieving one or more family stability or economic security outcomes as identified by the National Performance Indicators (NPI) in various domains. (Developmental Outcome); and*
- *12B: Increase the number of communities actively implementing community-wide transformation initiatives to address causes or conditions of poverty.*²⁰

It is unclear how OCS will use the proposed data in the CSBG Annual Report Version 3.0 to report on the two budget performance measures; however, it is clear that the changes to Modules 3 and 4 will make it difficult to collect data for both performance measures. Data quality challenges and potential underreporting of Family National Performance Indicators (FNPIs) are likely to negatively impact data for measure 12A. Additionally, the ongoing instruction that CSBG Annual Report 3.0 Module 4 as “optional” greatly reduces the number of CAAs and States reporting on their community-level change efforts which will impact measure 12B. If the proposed changes are approved, it is our view OCS will not have quality data to report on the two performance measures nor will it meet leading practices in federal performance management noted by GAO in their report.

It is this view and others noted below that compel us to recommend OCS clear CSBG Annual Report 2.1 now, maintaining continuity of reporting, and then engage the Network in deeper discussion to inform better improvements to CSBG Annual Report 3.0.

¹⁷ 42 U.S.C. § 9901(1).

¹⁸ Government Accountability Office, Community Services Block Grant: Better Alignment of Outcome Measures with Program Goals Could Help Assess National Effectiveness, GAO-20-25 (Nov. 19, 2019).

¹⁹ Administration for Children and Families, U.S. Department of Health and Human Services, Justification of Estimates for Appropriations Committees, Fiscal Year 2025 (March 2024).

²⁰ Id. at 187.

Data Points Removed from CSBG Annual Report 3.0 Module 1

In CSBG Annual Report Version 3.0, OCS removed Module 1, Section D that was previously found in Version 2.0 on page 8 which reported aggregated Organizational Standards compliance. OCS states that they will continue to monitor this data point through other means. While this may streamline state reporting, state CSBG offices are still required to monitor CAAs for compliance with the Organizational Standards annually and collect this data. Reporting to OCS through this mechanism provides a cohesive review of a state's performance and can help provide insight into key areas of additional training and technical assistance that may be needed.

NCAP recommends OCS include Organizational Standards compliance data points in the updated CSBG Annual Report 3.0.

OCS also removed Module 1, Section B data points B.2 and B.3 (found in Version 2.0 on pages 5 - 6) that report state American Customer Satisfaction Index (ACSI) scores and CSBG eligible entity feedback. OCS states that they will continue to exercise oversight over this key element of CSBG State Office performance, but the mechanism for that oversight is unclear. A State's ACSI score reflects effective administration of CSBG as determined by its customers, local CAAs.

To ensure transparency in evaluating state performance, NCAP recommends OCS include State ACSI data points B.2 and B.3 in the updated CSBG Annual Report 3.0.

Removal of Individual and Family Services and Family National Performance Indicators (FNPIs) in CSBG Annual Report 3.0 Module 3

In the Dear Colleague letter titled *ACF-OCS-CSBG-DCL-24-09 Annual Report 3.0 Revisions*, OCS reiterates their commitment to reducing the reporting burden of the CSBG Annual Report and indicates to that end it has eliminated 161 indicators from the CSBG Annual Report Version 3.0. CAAs are required by the Act to conduct local community assessments to inform their efforts to alleviate the causes and conditions of poverty. State CSBG Offices are charged with ensuring that CAAs fulfill this obligation by exercising oversight. The CSBG Annual Report plays a critical role in helping CAAs to articulate the interventions they are deploying and the change that they are creating, guided by their local Community Assessments and providing a tool for states to exercise oversight. As a block grant, CSBG has inherent flexibilities that allow it to be used in ways the community deems appropriate and in accordance with the purposes of the CSBG Act to alleviate poverty, revitalize communities, and empower people with low incomes.

Therefore, the CSBG Annual Report needs to reflect the broad array of possible strategies and outcomes a CAA may deploy or seek to achieve to effectively allow the CAA to report its impacts as directed by the community assessment. Historically, since the establishment of the CSBG performance management system in 1994 under the Government Performance and Results Act (GPRA), a broad menu of services and outcome indicators has been provided within network reporting. This menu is reflective of the diverse work of local CAAs, enabling CAAs to select and report on the items that best represent their work and impact. As CAAs are responsible for making sure CSBG programs work for individuals and communities with low incomes, they

should have full discretion to select the services and measures that are meaningful for their context and environment. **Maximum local flexibility must be preserved and should not be sacrificed in the name of streamlining and burden reduction.**

While reducing burden is essential, it must be balanced with maintaining the quality of the report to ensure it is reflective of the work CAAs do and the change they create. The proposed streamlining of services and outcomes in the CSBG Annual Report Version 3.0 comes at the cost of being able to effectively detail Community Action efforts. **NCAP is concerned that the proposed changes will not provide the level of detail needed for locals to clearly articulate the connection of their strategies and changes to their Community Assessment and add burden to states to effectively engage in required oversight.** Additional details on the challenges posed by the proposed streamlining are detailed in the Quality section of this letter.

Federal Reporting of Technical Assistance Plans

OCS proposes changes to the CSBG Annual Report in sections H.4 of Version 2.1 and sections F.4, and F.5 in Version 3.0, which require states to report on Technical Assistance Plans (TAPs) to OCS. The Act recognizes Quality Improvement Plans (QIPs) for addressing issues of noncompliance; TAPs were introduced as additional tools to collaboratively support compliance with the CSBG Organizational Standards. State CSBG offices are responsible for oversight of CSBG Eligible Entities (typically CAAs), ensuring they meet their CSBG obligations. Due to the nature of the block grant, CSBG State Offices vary in defining a "deficiency" and when to use a QIP or other corrective action tool. The federal role of OCS is to ensure states have adequate oversight procedures; therefore, we do not feel that reporting TAPs as corrective action to OCS is appropriate. The current Section H.5 in Version 2.1 already provides sufficient information to alert Congress and OCS to significant issues of noncompliance and ensure states address them as required by the Act. Asking for detailed reports on TAPs can incorrectly make it appear as if a CAA receiving technical assistance has significant issues of noncompliance warranting review.

NCAP recommends removing the TAP reporting requirements in Versions 2.1 and 3.0 to avoid unnecessary complications and potential misrepresentations of CAA noncompliance.

Training and Technical Assistance Evaluation Measures

In the proposed changes to CSBG Annual Report Version 3.0, OCS included a new datapoint within D.1 State Training and Technical Assistance to require information on "evaluation measures." It is unclear what OCS is attempting to capture here, making it difficult to provide meaningful feedback. The Act requires states to provide a summary of TTA offered but does not require that specific evaluation measures be reported to OCS. Additionally, it is unclear how this information is necessary for OCS oversight, as decisions on state-funded TTA are made at the state level. Including "Evaluation Measures for TTA" without context risks giving Congress and stakeholders an inaccurate view of TTA effectiveness.

We recommend removing "evaluation measures" from the table in D.1 in Version 3.0, as it is not needed or required by the CSBG Act or necessary for federal oversight.

V. Burden

In a Dear Colleague Letter (DCL) explaining the proposed revisions, OCS detailed that it has proposed significant changes to the CSBG Annual Report in Version 3.0 in an attempt to respond to subrecipient concerns about burden and in service to its commitment to “lifting up voices from the field.”²¹ NCAP and its member agencies agree that the CSBG Annual Report produces significant burdens for the Network and applauds OCS’ commitment to examining approaches to reduce this burden. *However, we have significant concerns that the proposed changes do not effectively achieve this goal and may, in fact, hinder the Community Action Network’s ability to accurately report the impacts of the Network’s efforts.*

The significant revisions proposed in the CSBG Annual Report Version 3.0, especially coming so soon after the last significant revision to the report, will impose undue burden on the Network. This burden manifests in several ways, impacting data systems, training requirements, and the overall ability of CAAs to report accurately and effectively on their efforts.

Burden Related to Proposed Module Revisions

The proposed changes will necessitate extensive and costly updates to data systems across the Network, including software modifications, new data collection protocols, and system reconfigurations to accommodate the revised report format. While some data system updates will occur through enterprise updates with minimal immediate costs to the Network, CAAs and states will likely incur additional costs due to necessary customizations to collect necessary datapoints that were streamlined at the federal level. Additionally, significant human capital will be diverted to retrain staff on the new reporting requirements. This training will require considerable time and resources, pulling staff away from their primary work of serving communities.

In CSBG Annual Report Version 3.0, OCS proposes swapping Modules 3 (currently Community Level Transformation in Version 2.0, to become Individual and Family Level) and 4 (currently Individual and Family Level in Version 2.0, to become Community Level). These changes necessitate system updates and additional training, imposing unnecessary costs and time burdens on agencies. CAA staff have just become accustomed to the current structure, as reported by NCAP members. We see no legitimate program or performance need that necessitates this change. The Act affirms that CSBG should focus on both community change and individual and family change; one is no more important than the other.

NCAP recommends retaining the current report structure, with Module 3 as Community Level Transformation and Module 4 as Individual and Family Level, to avoid these burdens without compromising report quality.

²¹ Office of Community Services, Administration for Children and Families, U.S. Department of Health and Human Services, ACF-OCS-CSBG-DCL-24-09, CSBG Annual Report 3.0 Revisions (April 22, 2024)).

Changes in Reporting Period

In CSBG Annual Report 3.0, OCS proposes that all reporting align with the Federal Fiscal Year (October 1 – September 30), starting from Federal Fiscal Year 2026. This change can enhance the national story and reporting quality by ensuring consistency across all reports. However, agencies not currently reporting on the Federal Fiscal Year will face significant burdens, including the need to update contracts, modify software systems, and retrain staff. On its listening sessions held with the CSBG Network, OCS explained that they expected this shift to be minor and that changes in state contract administration would not be required; however, several states impacted have expressed the significant challenges they will face with changing the reporting period without changing the contract period (which will in some cases now require additional reports to be collected from CAAs to ensure alignment of performance to the federal period and the state period). These adjustments will incur additional costs and require substantial time and effort at both the state and local levels.

To mitigate these challenges, it is essential that OCS work with the Community Action Network to provide targeted training, tools, and resources to support states and agencies during this transition. Recognizing the potential improvement in report quality, it is also crucial to acknowledge the practical impacts on local agencies and propose solutions to ease the transition, such as phased implementation and financial support for necessary updates.

Reduced Datapoints and Burden

The CSBG Annual Report functions as a comprehensive menu of reporting options, reflecting the diverse services, strategies, and impacts tailored to local community needs as identified through Community Assessments. CAAs, as diverse as the communities they serve, require a broad array of data points to accurately report their unique efforts and outcomes. While OCS asserts that reducing the number of data points will lessen the burden, it may instead dilute the richness of the Community Action story. CAAs do not report on every data point contained in the CSBG Annual Report; thus, eliminating indicators is not likely to significantly reduce the reporting burden but will compromise the quality and comprehensiveness of the report.

OCS has also suggested that CAAs can capture additional data points locally even if they are removed from the federal report. This approach imposes extra costs, as CAAs will need to customize their databases to include these commonly reported data sets, which often cover critical outcomes like job obtainment or educational improvements. Furthermore, several states have statutory requirements to collect specific data points included in the current CSBG Annual Report. These states will now have to customize their statewide databases (if available) to continue collecting this data, effectively shifting the burden from the federal level to state and local levels. Standardized data collection reduces costs for CAAs and states when procuring and configuring databases. Multiple states and CAAs use enterprise management information systems with standard CSBG Annual Report components. Removing standardized data points disrupts these efficiencies, leading to increased costs and complexity in data management for states and CAAs.

Burden Estimate

NCAP understands that multiple factors create challenges when developing burden hour estimates, including the diversity of respondents' capacities, data systems, and collection activities. Additionally, we recognize that the PRA process allows for adjustments in estimated burden hours based on comments received during the initial 60-day comment period and prior to agency submission of the ICR to OMB. OCS has indicated repeatedly that a major driver of the proposed changes in Version 3.0 is reporting burden reduction, a shared goal of the Network. Because burden reduction is so critical to these proposed changes, it is essential to understand and analyze the level of burden reduction the proposed changes may achieve. NCAP reviewed burden hour estimates, which are statutorily required as part of all ICR processes, across several Annual Report clearance activities OCS has conducted for the CSBG Annual Report in recent years, which raised a number of questions related to the burden estimates.

NCAP recommends that OCS provide clarification and additional information regarding the process or formula it utilizes in determining the average burden hour estimates.

Specifically, we believe it is important for the Network to have access to information that could shed light on comparisons between the estimated burden hours per CAA response for various collections.

NCAP has compiled the estimated average burden hours per eligible entity response into the chart below:

Date	Notice Type	Version	Estimated Average Burden Hours Per CAA Response
October 2, 2019 ²²	60-Day	2.0	242
January 22, 2020 ²³	30-Day	2.0	697
November 19, 2020 ²⁴	Expedited (60-Day)	2.0	697
April 26, 2021 ²⁵	30-Day	2.0	697
April 22, 2024 ²⁶	60-Day	2.1	493
April 22, 2024 ²⁷	60-Day	3.0	260

NCAP recommends OCS provide additional information on the wide-ranging disparities between the different estimates above, specifically 1.) what accounts for the dramatic decrease in estimated hours per response between Versions 2.0 and 2.1, if the latter only includes

²² Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Report (OMB No.: 0970-0492), 84 Fed. Reg. 52,506 (proposed Oct. 2, 2019).

²³ Submission for OMB Review; Community Services Block Grant Annual Report, 85 Fed. Reg. 3,694 (proposed Jan. 22, 2020).

²⁴ Expedited OMB Review and Public Comment: Community Services Block Grant (CSBG) Annual Report (OMB #0970-0492), 85 Fed. Reg. 73,724 (proposed Nov. 19, 2020).

²⁵ Submission for OMB Review; Community Services Block Grant (CSBG) Annual Report (OMB #0970-0492), 86 Fed. Reg. 22,056 (proposed April 26, 2021).

²⁶ Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Progress Report (Office of Management and Budget No. 0970-0492), 89 Fed. Reg. 29,339 (proposed April 22, 2024).

²⁷ Id.

“clarification revisions?”²⁸ and 2.) what accounts for the estimated hours per response for Version 2.1 being identical to those for the CSBG CARES Annual Report²⁹ (both 493 hours per response)?

NCAP believes OCS has overestimated the burden reduction associated with Version 3.0.

The claimed reduction, based on the percentage decrease in indicators, does not account for the actual workload involved in data aggregation and reporting. Fewer data points can paradoxically increase reporting burden by requiring CAAs to report multiple programs under a single indicator or service, necessitating time-consuming deduplication and integration of datasets. Deduplication is one of the most significant sources of burden for CAAs in completing the CSBG Annual Report. For example, a CAA may operate an employment program that offers specific skills training (reported in SRV 1a in Version 2.1), and an employment program that supports soft skills development for employment (reported in SRV 1e in Version 2.1). These datasets are deduplicated prior to reporting in their respective lines. In Version 3.0, both services are combined into SRV 1b (the number of adults that received skills training and opportunities for job), requiring the CAA to deduplicate these distinct datasets prior to reporting in this line which can increase reporting burden for CAAs.

VI. Quality

The proposed changes in Version 3.0 significantly compromise the quality of the CSBG Annual Report on several fronts. As previously described, the CSBG Annual Report serves as a crucial tool in detailing how CAAs strategically allocate those resources to *reduce poverty, revitalize low-income communities, and empower low-income families and individuals in rural and urban areas to become fully self-sufficient*[.]³⁰. As detailed below, OCS’s proposed elimination of numerous data points results in the report losing its capacity to comprehensively convey the diverse and nuanced approaches CAAs deploy to meet these localized needs. This diminishes the report's effectiveness in accurately reflecting the impactful and diverse work of CAAs nationwide. **While reducing burden is essential, it cannot come at the cost of report quality and its alignment with the CSBG statutory purpose.**

Services Supporting Multiple Domains

In the proposed changes to CSBG Annual Report Version 3.0, OCS has eliminated the option to report “Services Supporting Multiple Domains,” eroding a fundamental aspect of Community Action's holistic, person-centered approach to services. This omission significantly diminishes the report's quality, excluding crucial cross-cutting services such as case management, eligibility determinations, referrals, identification documents, reentry services, immigration support services, legal assistance, and mediation/customer advocacy (See CSBG Annual Report Version 2.1, Module 4, Section B, Services Supporting Multiple Domains, page 68). This removal not only overlooks critical aspects of Community Action's service provision but also undermines efforts to capture the breadth and depth of Community Action's work. Furthermore, the absence

²⁸ Id.

²⁹ 85 Fed. Reg. at 73,725; 86 Fed. Reg. at 22,057.

³⁰ Community Services Block Grant Act, 42 U.S.C. § 9901(1).

of these cross-cutting services undermines the holistic, integrated approach to service provision championed by Community Action, hindering agencies' ability to showcase innovative practices and impactful interventions while compromising CSBG's statutory purpose of addressing the multifaceted needs of individuals and families.

A core purpose of CSBG is to not only to implement services and strategies that alleviate poverty and create economic opportunity, but also to coordinate the existing system of services to better serve people and communities to this end.³¹ Some of the services eliminated in OCS' proposed changes to the CSBG Annual Report Version 3.0 are those that allow agencies to operate exactly in this space – coordinating eligibility determinations across complex systems; making referrals to existing services; and supporting individuals to obtain documentation needed to navigate the complex web of services. There is concern that the exclusion of these services from the CSBG Annual Report could be interpreted as indicating that these services are not allowable with CSBG, which would significantly impact CAAs' ability to deliver comprehensive support to individuals and families. Additionally, the elimination of this domain will have budget impacts, as CAAs will need to determine how to allocate costs associated with cross-cutting services, assuming states still allow them. This could lead to increased administrative burdens and challenges in maintaining the effectiveness of integrated service delivery.

NCAP proposes that OCS incorporate holistic, cross cutting services into CSBG Annual Report Version 3.0 to mitigate these concerns and maintain our commitment to holistic service delivery. This could be addressed by incorporating a holistic services or integrated services domain, which would ensure consistent reporting of these essential services, help CAAs budget for these services appropriately, and reduce administrative burdens.

Outputs Reported as Outcomes in CSBG Annual Report Version 3.0

The proposed revisions to CSBG Annual Report Version 3.0, Module 3, Section B (Individual and Family National Performance Indicators or FNPIs) include a mixture of outputs and outcomes, which blur the distinction between the activities undertaken by agencies and the tangible impacts achieved as a result of these endeavors. This is a significant departure from established Community Action performance management principles, including the Results-Oriented Management and Accountability (ROMA) framework (as included in the OCS Performance, Evaluation, Accountability, Accessibility, and Knowledge (PEAAK) framework) and undermines the fundamental beliefs of Community Action, which emphasize not only the provision of services but also the creation of meaningful change. By diluting the focus on outcome-oriented measures, the revised report risks obscuring the true effectiveness of Community Action and detracting from the program's overarching goal of going beyond service provision to creating positive change for individuals and communities. These proposed changes not only compromise the integrity of the Annual Report but also undermine the foundational principles that underpin the Community Action movement and CSBG's statutory purpose.

³¹ Community Services Block Grant Act, 42 U.S.C. § 9908

We recognize that performance management principles incorporate the measurement of outputs along with outcomes; the CSBG Annual Report incorporates this concept by measuring outputs within the family level services CAAs report on in Module 3 of Version 3.0. **NCAP is supportive of continuing to collect and report outputs as important datapoints to understand Network performance; however, we recommend that the proposed new indicators that are better reflective of outputs either be reworded to reflect the outcomes they seek to achieve, or if appropriate, be included in the family-level services section of Module 3 in CSBG Annual Report Version 3.0 to keep the clear distinction between outputs and outcomes apparent in reporting.** Further, adding outputs as FNPIs as proposed in the changes from OCS that are duplicative of reported services adds burden and complexity to reporting that will not improve report quality. **NCAP would also recommend that OCS consider revising proposed FNPI language that includes references to people served, as the outcome is meant to reflect the change in status as a result of the output or unit of service.**

In addition to the other changes noted in our comments, NCAP proposes revisions to Section B FNPIs that reflect outputs rather than outcomes in CSBG Annual Report Version 3.0, Module 3, including:

OCS Proposed CSBG Annual Report Version 3.0 FNPI Identified as Outputs	NCAP Proposed Revision
FNPI 2a. The number of young children (0-5) enrolled in childcare or early childhood education services. (Note: as written this indicator duplicates SRV 2a and 2b)	FNPI 2a. The number of young children (0-5) enrolled in childcare or early childhood education services who achieve developmental milestones.
FNPI 2b. The number of youth actively connected to education and skills development programs.	FNPI 2b. The number of youth actively connected to education and skills development programs who are achieving milestones.
FNPI 2e. The number of individuals who enrolled in a post-secondary degree program (e.g., associates, bachelors, etc.)	Eliminate – covered through SRV 2g and FNPI 2f
FNPI 3a. The number of individuals completing income and asset building training.	FNPI 3a. The number of individuals who demonstrated improved financial stability through increased savings, reduced debt, or new assets.
Becomes FNPI 4f. The number of individuals served with energy assistance or energy efficiency homes.	FNPI 4f. The number of individuals served with energy assistance who experience increased home energy efficiency or reduced energy burden.
FNPI 5b. The number of individuals with access to health coverage.	FNPI 5b. The number of individuals who obtain health coverage.
FNPI 5c. The number of individuals receiving reproductive services. (Note: as written this indicator duplicates SRV 5f and 5g)	FNPI 5c. The number of individuals who improved their ability to make informed decisions regarding reproductive health.

	FNPI 5d.* The number of individuals who gained knowledge and skills related to maternal and child health. (proposed second indicator impacting report sequence)
FNPI 5d. The number of individuals receiving wellness services. (Note: as written this indicator duplicates SRV 5h)	Eliminate – covered through SRV 5h and FNPI 5f
FNPI 5e. The number of older adults (age 65+) receiving home visiting services. (Note: as written this indicator duplicates SRV 5i)	Keep AR 2.0 FNPI 5f: Number of older adults who maintained independent living situation.
FNPI 5g. The number of adults receiving preventative oral health services.	FNPI 5g. The number of adults who maintain oral health.
FNPI 5h. The number of children receiving preventative oral health services.	FNPI 5h. Number of children who maintain oral health.
FNPI 5i. The number of individuals receiving access to healthy food options. (Note: as written this indicator duplicates SRV 5q)	FNPI 5i. Number of individuals who are better able to meet family food needs.

Reduced CSBG Annual Report Version 3.0 FNPIs

OCS proposes a significant reduction of FNPIs in CSBG Annual Report Version 3.0. While OCS remains focused on reducing burden, consideration must be given to balancing the need for reduced burden with data quality. **The proposed streamlining of FNPIs risks presenting an incomplete picture of agency impact, thereby diminishing reporting quality.** Notably, the reduced focus on employment outcomes, now primarily centered on skills enhancement and income augmentation, overlooks critical metrics such as job attainment, retention, and career advancement. Similarly, the narrowed scope of education indicators misses essential CAA impacts on developmental milestones and broader educational outcomes. Moreover, removing indicators related to holistic family impact undermines our understanding of CAAs' role in enhancing parenting practices, family dynamics, and children's developmental progress.

While the consolidation of outcomes may streamline reporting processes, it poses challenges regarding flexibility and the ability to demonstrate impact. In the current report, CAAs have this flexibility through the reporting of “Z” indicators, which allow CAAs to develop their own outcomes. CAAs use “Z” indicators to report these custom outcomes, crucial for gathering comprehensive data at local, state, and national levels, and can be used as a critical dataset to inform future improvements of the CSBG Annual Report.

The reduction in reportable outcomes, coupled with the removal of “z” indicators, may constrain agencies' capacity to showcase their effectiveness in fulfilling the statutory purpose of CSBG. Given the flexibility of CSBG to be used for the broad purposes of reducing poverty, revitalizing communities of low-income, and promoting self-sufficiency as directed by local CAA community assessments, there are countless possible outcomes that a CAA may seek to achieve. Thus, it is essential that the CSBG Annual Report maintain the ability to report custom localized outcomes as directed by local assessment.

In addition to the other changes noted in this document, NCAP has provided specific recommendations regarding FNPIs that were available in Version 2.1 but have been streamlined or eliminated in Version 3.0. Details of our recommendations can be found in the chart below:

CSBG Annual Report Version 2.1 Module 4 Section A (Individual & Family Services) Streamlined FNPIs	Comments	NCAP Recommendations
FNPI 1b. The number of unemployed adults who obtained employment (up to a living wage). / FNPI 1e. The number of unemployed adults who obtained employment (with a living wage or higher).	• Job attainment is a common, essential outcome of CAA efforts. It is a milestone achievement for some individuals on a longer journey. CAAs meet people where they are with all types of capabilities. • The differentiation of living wage vs nonliving wage may pose a burden in data collection and reporting.	Retain with revision in Version 3.0: The number of unemployed adults who obtained employment.
FNPI 1c./FNPI 1d./FNPI 1f./FNPI 1g. The number of unemployed adults who obtained and maintained employment up to a living wage/with a living wage or higher for 90/180 days	• These outcomes have been burdensome for the Network due to the required subset reporting by living wage and by period of time. • The outcome misses assistance provided by CAAs to help people who are already employed maintain their employment.	Retain with revision in Version 3.0 to: The number of adults who maintained employment for 90 days.
FNPI 2d. The number of children and youth who are achieving at basic grade level (academic, social, and other school success skills).	• This FNPI shows the results of enrollment in agency services and programs. It is a critical outcome for agencies that are pursuing Whole	Retain with revision in Version 3.0 to: The number of children and youth who are achieving at basic grade level. (no subset reporting)

	Family 2/Generation approaches and other evidence-informed promising practices. • In the prior report, this datapoint required a breakdown by grade; this could be simplified to still capture the impact while reducing burden.	
FNPI 2e. The number of parents/caregivers who improved their home environments.	• This outcome is important to capture Whole Family/2 Gen approaches and other evidence-informed promising practices. • Agencies using this indicator usually have some form of assessment they administer to measure change.	Retain in Version 3.0: The number of parents/caregivers who improved their home environments.
FNPI 2f. The number of adults who demonstrated improved basic education.	• This outcome captures the change in status from CAA services and is a critical outcome to helping individuals achieve social and economic mobility.	Retain with revision in Version 3.0: The number of adults who demonstrated improved basic education or English language.
FNPI 3d. The number of individuals who increased their savings.	• CAAs do extensive work in the financial well-being/financial literacy area with individuals to improve their financial condition and assets; this outcome captures a portion of these efforts	Revise Version 3.0 proposed FNPI 3a to: The number of individuals who opened a savings account/IDA or increased savings.
FNPI 3e.1 Of the above, the number of individuals who purchased a home.	• CAAs offer homebuying assistance; this outcome captures this important milestone in supporting	Retain with revision in Version 3.0: The number of individuals who purchased or refinanced a home.

	social and economic mobility. • Even if the numbers are small, this is a high impact outcome as housing and particularly home-ownership is a lever for other outcomes, a protective factors, and a gateway to build generational wealth. • The prior report required this as a subset of a larger indicator, which created burden.	
FNPI 5d. The number of individuals who improved skills related to the adult role of parents/caregivers.	• This outcome is essential to capturing the impact of CAAs when working in Whole Family/2 Gen Approaches and other evidence-informed practices. • CAAs that operate Head Start and Early Head Start achieve outcomes in this area as part of the Parent, Family, and Community Engagement Framework services which are often integrated with a variety of CAA services. • Agencies that conduct this work use assessment tools to measure the change.	Retain in Version 3.0: The number of individuals who improved skills related to the adult role of parents/caregivers.
FNPI 6a.2 The number of Community Action program participants who improved their social networks.	• Increasing bonding social capital is an important outcome of some CAA programs, especially Whole Family/2 Generation Approaches	Retain in Version 3.0: The number of Community Action program participants who increased their social networks. (no subset reporting)

FNPI 1z; FNPI 2z; FNPI 3z; FNPI 4z; FNPI 5z; FNPI 6z; FNPI 7z	• Because CAAs are statutorily required to develop strategies to meet unique local needs, CAAs need flexibility to report indicators beyond standard FNPIs included in the CSBG Annual Report. • z indicators reflect the importance of local control in designing services and outcomes to respond to local needs	Retain in Version 3.0: The number of individuals who... (to be completed as needed by each CAA)
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It is important to again recognize that reduction in reportable outcomes does not necessarily alleviate the reporting burden, given that CAAs use the CSBG Annual Report as a menu of possible reportable outcomes and never reporting on all outcomes contained therein. Therefore, maintaining a diverse range of potential outcomes is essential to accurately reflect the broad impact of the national Network and ensure robust reporting quality.

NCAP supports removing Outcome 7a from the prior CSBG Annual Report Version 2.1 in the revised CSBG Annual Report 3.0 to reduce burden which is driven by deduplication efforts needed to report in this datapoint.

Reduced CSBG Annual Report Version 3.0 Individual and Family Services

In CSBG Annual Report 3.0, Module 3, Section A, OCS has proposed a significant reduction of reportable services, aiming to reduce the burden on agencies by consolidating and eliminating various service categories. While the removal of duplicative services could reduce the reporting burden, the streamlining proposed may ultimately compromise the quality, comprehensiveness of the CSBG Annual Report, and the report's alignment with statutory expectations for CSBG impact. By consolidating services to the point where the specific and varied efforts of CAAs are no longer fully represented, there is a risk of underreporting the breadth and depth of critical services that CAAs provide.

Specifically, NCAP recommends OCS consider streamlined services (revised or removed) and their unintended consequences, including:

CSBG Annual Report Version 2.1 Module 4 Section B (Individual & Family Services) Streamlined Datapoints	Challenges	NCAP Recommendations
SRV 1a – 1q (Employment Services)	• The streamlining of services in the Employment domain eliminated services beyond supplies and job skills training; CAAs provide a broad range of services in this domain. • Coaching was removed as a service here and under other domains. Coaching and/or case management are critical services to helping achieve employment	• Revise Version 3.0 Module 3 to include the following services: ○ Add the number of adults receiving employment development supports (including resume writing, career counseling, etc.)
SRV 2r-z (Adult Education Programs)	• The proposed streamlined services no longer include education services for adults related to post-secondary education and eliminated parenting supports – both key elements of CAA programming including 2 Gen/Whole Family approaches and other evidence-informed practices.	• Revise Version 3.0 Module 3 to include the following services: ○ Change SRV 2g. The number of individuals receiving college/post-secondary readiness support (e.g.: applications, scholarships, textbooks, computers) to SRV 2g. The number of adults receiving post-secondary supports (including tuition assistance/scholarships, materials/supplies, etc.) ○ Add the number of adults receiving services and supports to improve their parenting skills

SRV 2cc Home Visits (Home Visits)	• The service list in Version 2.1 Module 4, Section B. includes the service “home visits” within the education domain. The CSBG Annual Report Lexicon defines this service as “services related to early learning, health, and family well-being that occur in the family’s home. This service is provided in addition to other educational opportunities.”³² The current CSBG Annual Report service list includes a mix of services and common CAA programs - For example, Early Head Start, Parents as Teachers, Nurse Family Partnership all use home visiting to help achieve the specific goals each program targets. If OCS intends to differentiate between different types of programs, it should consider the interventions commonly found in these programs. • Home visiting is a form of practice like coaching, case management, or navigation that can be used in different types of programs and in combination with other services. This coordination and integration of services is a hallmark of Community Action and the service and FNPI lists must account for this important reality. • In Version 3.0, OCS proposes changing this service to “The number of families participating in an evidence-	• Revise Version 3.0 Module 3 to include the following services: ○ Change SRV 2r. The number of families participating in an evidence-based home visiting program to SRV 2r. The number of households participating in evidence-informed home visiting services (<i>note – this service may be best captured in a holistic services domain</i>)
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³² National Association for State Community Services Programs (NASCS), "CSBG Annual Report Lexicon," January 2019, accessed 6/18/2024, https://nascsp.org/wp-content/uploads/2019/01/CSBG-AR-Lexicon_01019.pdf.

	based home visiting program” which significantly narrows the reportable and important services CAAs provide to families in their homes.	
SRV 3a – 3f; 3m – 3o (Income Management and Asset Building)	• The streamlined services merge many CAA services into proposed SRV 3a, which dilutes the ability of CAAs to detail their specific approaches in response to community needs. Additionally, this outcome is a high impact outcome as asset building is a lever for other outcomes that are protective factors, and a gateway to generational wealth. • Many CAAs are informed by the Consumer Financial Protection Bureau's (CFPB) research and tools on financial well-being.	Revise Version 3.0 Module 3 to include the following services: ○ Add the number of households receiving Volunteer Income Tax Assistance (VITA) or other no/low-cost tax preparation ○ Add the number of households accessing Saving Accounts/IDAs and other asset building accounts ○ Add the number of households receiving home-buying counseling or other support Eliminate proposed CSBG Annual Report Version 3.0 Module 3 Section A Service: ○ SRV 3d (<i>The number of individuals receiving transportation services supporting income and asset building</i>) due to duplication with services reported in the new Transportation domain.
SRV 4a-4b; 4i-l; and 4r-4s	• Within housing services, CAAs do more than just provide direct cash assistance; many employ certified housing counselors who offer extensive support beyond simply arranging for a housing payment. • In Version 3.0, the program category Utility Payment	• Revise Version 3.0 Module 3 to include the following services: ○ Add the number of individuals that received housing counseling. ○ Add the number of households receiving independent-living

	Assistance (SRV 4i-l) was combined under Eviction Prevention Services. We advocate for utility assistance to be reinstated as a distinct category separate from eviction prevention services. • The program category Utility payment Assistance (SRV 4i-l) was collapsed and placed under Eviction Prevention Services in Version 3.0. We believe that utility service should be a separate category from eviction prevention.	Home Improvements (e.g. ramps, tub and shower grab bars, handicap accessible modifications, etc.) ○ Add the number of households receiving Healthy Homes Services (e.g. reduction or elimination of lead, radon, carbon monoxide and/or fire hazards or electrical issues, etc.) • Add the program category of Utility Assistance back as its own program category.
SRV 6b (Leadership Training)	• Eliminated service related to leadership training; this service may not be reported by all CAAs but is reflective of CAAs efforts to maintain the fidelity of their statutory mission to empower low-income persons and revitalize communities.	• Revise Version 3.0 Module 3 to include the following services: ○ Add the number of individuals receiving voter education and access ○ Add the number of individuals participating in Leadership Training
SRV 7a – c; SRV 7h -m; SRV o (Services Supporting Multiple Domains)	• As detailed in these comments in Part VI. Quality – Section Services Supporting Multiple Domains, OCS proposes elimination of key services including Case Management (SRV 7a); Eligibility Determinations (SRV 7b); Referrals (SRV 7c); Identification documents (SRV 7h-j); Reentry Services (SRV 7k); Immigration Support Services (SRV 7l);	• As detailed in Part VI. Quality – Section Services Supporting Multiple Domains, NCAP recommends including the following services: ○ Add the number of individuals receiving coaching or case management services; ○ Add the number of individuals for whom eligibility for CAA

	Legal Assistance (SRV 7m); and Mediation/Customer Advocacy (SRV 7o) which undermines CAAs' ability to tell the story of their integrated, holistic service delivery. • The CSBG Annual Report does not currently capture the important role that CAAs play in disaster response. This update to the CSBG Annual Report provides an opportunity to not only revise existing services, but also to incorporate essential services such as this to reflect the impact of CAAs.	and other community programs was determined; ○ Add the number of individuals receiving referrals for services from community partners; ○ Add the number of individuals obtaining identification documents; ○ Add the number of individuals receiving reentry services; ○ Add the number of individuals receiving immigration services; ○ Add the number of individuals receiving legal assistance; ○ Add the number of individuals receiving mediations or customer advocacy; ○ Add the number of households receiving disaster response services
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The consolidation of services can help streamline reporting, but it must be balanced to ensure that the Network can clearly articulate its interventions and strategies to create change. The CSBG Annual Report acts as a menu of options for reporting common services and requires flexibility to allow locally driven agencies to report on the diverse and adaptable services and strategies deployed to meet local needs. **Eliminating key services does not necessarily reduce the burden and may decrease the report's quality and its alignment with CSBG's statutory purpose.**

Identification of Services as Concrete Supports with No Performance Indicators

In CSBG Annual Report 3.0, OCS introduces the concept that approximately fourteen services included in Module 3, Section A are "Concrete Supports." In the Service to Outcome Plan, OCS added a new concept that a service identified as a concrete support that "does not require a performance indicator as it is a tangible service to support economic mobility." This change is an

important recognition that addressing material hardship, supplementing income and/or public benefits is critical, but often alone does not contribute to a measurable outcome. More often these types of services combined with others work together to increase economic security and/or economic mobility depending on the population assisted. **The inclusion of Concrete Supports is a positive step, as it reflects the critical work CAAs do to address material hardship and stabilize individuals and families.** These services, while not always resulting in immediate measurable outcomes, are essential for providing tangible assistance and creating a foundation for longer-term success. Recognizing and reporting these supports will give a more accurate picture of the diverse and comprehensive efforts of CAAs. NCAP has several recommendations related to the addition of concrete supports:

- **Refine the language in the Service to Outcome Plan to more clearly demonstrate that concrete economic supports are not only tangible services to support economic mobility, but also economic stability or security.** For senior populations or persons with disabilities many of the types of services identified by OCS as concrete supports are delivered to supplement public benefits, reduce material hardship, and maintain stability or security. We believe it is important to reflect both economic mobility and economic stability/security in this new concrete support framing.
- Three services in the Service to Outcomes plan are not identified as concrete supports or having a performance indicator. **Services 3c and 5j should be identified as concrete supports.** See above for recommendations on Service 2r.
- **SRV 3b, the number of individuals that received business and entrepreneurial financial services, should not be connected to a concrete support.** Many CAAs work in this space, and the outcome they target is individuals starting small businesses. Although the numbers for this outcome may be small, we believe the impact of these services is significant and should be captured in an actual performance measure rather than identification as a concrete support.

Addition of Transportation Domain to CSBG Annual Report Version 3.0

In CSBG Annual Report 3.0, OCS proposes adding a new Transportation domain to capture transportation services provided by CAAs. This addition elevates the recognition of the critical transportation work done by CAAs. **However, challenges remain in capturing the full impact of these services as many CAAs do not collect demographic data on riders or cannot deduplicate the people served, limiting the ability to report these services accurately in CSBG Annual Report Version 3.0 Module 3 (Individual & Family).** Additionally, the current OCS guidelines limit CAA's ability to report community level transformation in the CSBG Annual Report only to new efforts; therefore, CAAs with existing broad transportation efforts still will not be able to report their impacts. For instance, CAAs operating large-scale transportation systems provide critical services to thousands of individuals, facilitating access to employment, education, healthcare, and other essential services. However, without the ability to deduplicate ridership data or track individual-level outcomes, these extensive efforts cannot be accurately captured in Module 3 (Individual & Family). Consequently, the significant community-wide impact of these transportation services—such as improved community mobility, economic development, and enhanced quality of life—goes unreported because these

systems may be long-standing Community Action efforts and therefore unreportable as a community-level transformation effort under current guidelines. Better reflection of Community Action efforts in the transportation space will require significant revisions of the report and policies related to Module 4 of the CSBG Annual Report Version 3.0.

Elimination of Single Parent Female/Single Parent Male Designation in Household Type

In CSBG Annual Report Version 3.0, OCS streamlined the Household Type section in Module 3, Section B, D – Household Characteristics, 9) Household Type, on page 41, removing the differentiation between single-parent female and male heads of household. These distinctions are crucial for understanding who CAAs are serving and enable CAAs to make informed decisions about program policy. They provide insights into the demographic makeup of households served, essential for tailoring services to meet specific needs. Differentiating between single-parent female and male heads of households helps identify unique challenges and develop targeted strategies to address issues like childcare, employment, and financial stability. This data is also vital for telling state and national stories, showcasing the impact of CSBG-funded programs on diverse family structures. Some CAA data systems may not be refined enough to query this information out of the data, so having it as a characteristic encourages data system vendors to make that data easily available in reporting components.

NCAP recommends reinstating the differentiation of single parent female/single parent male in the Household Characteristics section of the CSBG Annual Report to ensure a comprehensive understanding of household characteristics and provide needed data for decision making at the local and state levels.

Elimination of Income Source in Household Demographics

OCS' CSBG Annual Report Version 3.0 Module 3 Section C eliminates the Sources of Household Income datapoint found in CSBG Annual Report Version 2.1 Module 4 Section C: All Characteristics Report, D.13. This datapoint informs program development and evaluation and plays a pivotal role in debunking myths about the demographics of individuals and families assisted by CAAs. Given that this data is already collected for eligibility purposes, the elimination of this data point would not alleviate the reporting burden.

NCAP recommends retaining the household income source data point in demographics reporting to ensure the accurate representation of the economic impact of services provided by CAAs and to maintain critical insights into the economic conditions of the populations they serve.

Elimination of Datasets that Cannot be Unduplicated

OCS' CSBG Annual Report Version 3.0 Module 3 Section C eliminates the ability to report datasets that cannot be unduplicated as found in CSBG Annual Report Version 2.1 Module 4 Section C E-F. While the removal may streamline reporting processes at the local level, there is a risk of underreporting the full impact of CAAs. Datasets that cannot be unduplicated often

include segments of the population served by CAAs that cannot be integrated into agency reporting systems. These datasets often represent vulnerable populations or specialized services that require unique reporting mechanisms. This section of the report can also be leveraged to identify possible areas where the Federal and State governments may be helpful in removing barriers to data sharing that can drive the need for this section.

NCAP recommends retaining this section in demographics reporting to ensure a comprehensive and accurate representation of the impacts of CAAs.

VII. Clarity

Clarity of Reporting and Definitions

OCS has not provided sufficient instructions and guidance on how OCS interprets the data points and changes for the Network to fully respond to the proposed changes. Without clear implementation details and definitions of key terms, it is difficult for us to provide fully informed comments. The absence of instruction manuals to understand how OCS interprets data points and what they expect to be included or excluded creates uncertainty.

We recommend that OCS work with the Network to develop reporting guidance and definitions. CAAs, who work with this data every day, are best positioned to provide guidance to OCS to inform instructions that are clear, realistic, and meet the needs of the Network prior to posting Version 3.0 for clearance. This collaboration will ensure a better understanding of the implementation process and allow for more precise and constructive comments on the proposed changes in the next phase of the clearance process.

CSBG Annual Report Version 3.0 Module 4 – Community Level Transformation

In the revised CSBG Annual Report 3.0, OCS continues to identify what is now Module 4, Community Level Transformation, as optional. This optional status, coupled with OCS's lack of recent feedback or reporting on community change efforts, has resulted in a significant gap in reflecting the true impact of these initiatives. For example, CAAs across the country are developing housing, addressing systemic racism, and creating jobs and yet these types of critical impacts are going unreported. We are especially concerned that the recent reports to Congress do not include any community level change outcomes.

It is important to note that while CSBG Annual Reporting itself is not optional, CAAs report only on the indicators and services in which they are working. Thus, to some extent, all datapoints could be marked as optional, yet to designate only Module 4 as optional seems to portray that it is not required even when a CAA is working to achieve community level transformation. Designating Module 4 as optional risks diminishing the importance of community-level efforts at the local and state levels and inadvertently convey to Congress and other stakeholders that CAAs are not effectively driving community change.

The ability to pursue community change is fundamental to CSBG’s statutory purpose; it is the cornerstone of CAAs' mission and should be reflected as such within the CSBG Annual Report. Very few federal funding sources support such flexible and transformative community change efforts. We believe a renewed focus on the community-level data is imperative.

OCS's decision not to propose changes to Module 4 in CSBG Annual Report Version 3.0 misses a crucial opportunity to strengthen this vital aspect of the report. Historically, OCS has restricted reporting in Module 4 to new initiatives only, excluding ongoing community efforts such as transportation systems and affordable housing complexes. This limitation not only undermines the recognition of sustained, essential services but also hinders understanding of the substantial benefits CAAs bring to communities. By designating community level work as optional, there is a risk of underreporting critical activities, thereby obscuring the significant contributions CAAs make at the community and/or systems level.

NCAP recommends that OCS remove the “optional” framing from Module 4 in the CSBG Annual Report Version 3.0 and update its guidance to allow for reporting of ongoing Community Action initiatives within the module.

Services to Outcome Plan

In CSBG Annual Report 3.0, OCS introduces a new Services to Outcome plan, aiming to perhaps create a direct link or mapping between services provided and the outcomes achieved. While this approach holds potential for more consistent alignment of services to outcomes across the nation, additional detailed guidance on the implementation of this plan is necessary before it can be fully considered. It is unclear whether reporting a service will be mandatory to report the associated outcome as proposed in the Services to Outcome plan. If OCS mandates that a service must be reported to claim an outcome, this could create significant reporting challenges, increase burden, and reduce reporting quality. For instance, CAAs may struggle with deduplication of services, leading to outcomes being reported without linked services. Additionally, not all services align neatly with specific outcomes, further complicating accurate reporting and potentially misrepresenting the comprehensive work of CAAs.

The proposed Services to Outcome plan may also inadvertently reduce the flexibility needed by local CAAs to respond effectively to unique local conditions. Many services may contribute to an outcome, or many outcomes may be achieved through a single service (as represented with Services 4e and 4f, which are mapped to multiple outcomes); a rigid link between services and specific outcomes does not capture the complexity or reality of the work CAAs do every day. Depending on the goal and purpose of this document we think there could be significant negative impacts on reporting.

To ensure that the proposed plan supports accurate and comprehensive reporting, OCS should share additional information on its intent and goals and engage the Community Action Network in deeper, intentional engagement before proceeding with clearance of Version 3.0.

Individual Characteristics Section Revision

OCS has stated they will be revising the demographics section to comply with recent updates to Statistical Policy Directive No. 15 (Directive No. 15) and better align demographics with census categories.³³ However, this information has not been made available for review during the 60-day comment period. Demographics are a key element of the CSBG Annual Report, helping CAAs to tell the story of who is impacted by services, evaluate agency impact and reach, ensure there is no disproportionality in those served, and use data to make informed decisions. **Detail related to the demographics that will be collected is crucial, and OCS should consider making this a key area for review with the Network prior to the next clearance of Version 3.0.** Ensuring that demographic data collection aligns with Directive No. 15 and census categories while reflecting the needs of the Network is essential for accurate reporting and effective program evaluation.

VIII. Other Additions, Revisions, and Modifications

Considering the proposed changes to the CSBG Annual Report, it is imperative to address the need for enhanced training, resources, and support for Network members to ensure successful implementation. **OCS should allocate additional resources to support necessary updates to software systems, and training and technical assistance** using providers fluent in the context and needs of the CSBG Network. Ensuring that CAAs have access to relevant, comprehensive, and ongoing training and resources will facilitate a smoother transition and minimize disruptions in service delivery and reporting accuracy

IX. Conclusion

NCAP appreciates the opportunity to provide feedback on the proposed changes to the CSBG Annual Report. We commend OCS for its commitment to reducing the reporting burden and enhancing the quality of data collected. However, we believe further refinement is necessary to ensure alignment with the core purposes of the CSBG Act and the realities of the Community Action Network.

We urge the Office of Community Services (OCS) to carefully consider the feedback, comments, and recommendations provided by NCAP, its member agencies, and other stakeholders in the Community Action Network. We hope OCS will take the time to review all the comments and look for creative solutions to maintain continuity of reporting and not rush to complete a clearance process that is incomplete. Our joint mission calls for collaboration to alleviate poverty, revitalize communities, and empower people and families and we remain committed to working together with OCS and other stakeholders to ensure that the CSBG Annual Report accurately reflects the impact achieved by CAAs across the country.

³³ Office of Information and Regulatory Affairs, Office of Management and Budget, Executive Office of the President, Revisions to OMB's Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity, 89 Fed. Reg. 22,182 (March 29, 2024).

Given the significant concerns raised with the proposed CSBG Annual Report Version 3.0 and the lack of comprehensive engagement with the Network, we ask that OCS consider clearing CSBG Annual Report Version 2.1 at this time and engage with the Community Action Network prior to the clearance of Version 3.0 in order to allow for a collaborative process that genuinely reduces burden while preserving the quality and integrity of the report.

Thank you for the opportunity to provide feedback on the proposed changes. Please feel free to contact us directly if we can provide any additional information or support during this process. We look forward to working with OCS on these critical issues that affect the continued stability, efficacy, and health of the Community Action Network as well as the social and economic wellbeing of the millions of families we serve.

Sincerely,

A handwritten signature in black ink, appearing to read 'Denise L. Harlow', with a stylized, cursive script.

Denise L. Harlow, MSW, CCAP
Chief Executive Officer
National Community Action Partnership