



November 1, 2024

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

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

Dear Mr. Revesz,

On behalf of the CSBG National Partners including the National Community Action Partnership (NCAP), Community Action Program Legal Services (CAPLAW), the National Association for State Community Services Programs (NASCSPP), the Association of Nationally Certified Results Oriented Management and Accountability (ROMA) Trainers and Implementers (ANCRT), and the undersigned members of the Community Action Network (Network) (Network members or signatories), thank you for the opportunity to offer public comments in response to the significant changes proposed by the Office of Community Services (OCS) to the CSBG Annual Report, as outlined in the Federal Register notice (FRN).¹ The CSBG Annual Report is a critical and statutorily-required tool used to document the impacts of the Network on addressing the causes and conditions of poverty and to measure and manage the performance of the Network at the local, state, and national levels.

NCAP serves as the national membership association and hub that links over 1,000 Community Action Agencies (CAAs) and state associations across the country. NCAP's mission is to ensure the causes and conditions of poverty are effectively addressed and to strengthen, promote, represent, and serve the Network. CAPLAW is a membership organization that provides training and technical assistance on legal, governance and management issues to the nationwide network of CAAs. NASCSPP is the national association for the fifty-three State CSBG Lead Agencies with a mission of increasing capacity in states to achieve economic security and energy efficiency in low-income communities. ANCRT provides training and technical assistance to the Network around performance measurement and management and all areas of the ROMA cycle. ANCRT's mission is to provide support and continuing education to Nationally Certified ROMA Professionals, collaborating with national, state, and local community action partners to improve

¹ Submission for Office of Management and Budget (OMB) Review; Community Services Block Grant (CSBG) Annual Progress Report (OMB No. 0970-0492), 89 Fed. Reg. 81918 (October 9, 2024).

the network's ability to achieve, document, report, and analyze results and to use data for decision making.

As mission- and member-driven organizations comprised of professionals with extensive knowledge of and experience in working at the state, local, and national levels of the Network, we are thought leaders and key stakeholders in this process. Our feedback and comments are delivered in the interest of ensuring the proposed CSBG Annual Report Version 3.0 effectively and accurately reflects the important work of the Network.

These comments represent the culmination of interactive engagements throughout the OMB clearance process, including: gathering feedback from the CSBG Annual Report Advisory Group (a diverse group representing CAAs, state associations, and CSBG National Partners); a virtual forum held on May 29, 2024; an in-person forum held on June 5, 2024; Network-wide surveys administered by NCAP and ANCRT; and other interactions with Network members on the topic of reporting during conferences and webinars. Our comments seek to address the questions posed in the FRN² and offer additional detail and context to support our requested changes to the CSBG Annual Report Version 3.0.

I. CSBG Annual Report OMB Clearance Process and Network Response

The process for developing updates to the CSBG Annual Report must be rigorous and inclusive, providing robust opportunities for Network engagement and participation. The National Partners and Network members have significant concerns that the current process, while technically in compliance with minimum federal requirements for information collection activities, has provided insufficient engagement with the Network and, therefore, could yield results that do not accurately reflect the feedback and experiences of those most affected by the changes.

On April 22, 2024, OCS published a Federal Register notice that initiated a 60-day public comment period on proposed changes to the CSBG Annual Report.³ The proposal planned to deploy changes in two stages – Version 2.1, a largely unchanged version of the collection in effect at that time, and Version 3.0, which proposed significant revisions for use in subsequent reporting years.⁴ Despite these extensive changes, there was no structured Network engagement regarding Version 3.0 prior to its release. The changes were based solely on OCS's internal review of past reporting, technical assistance requests, and ad hoc discussions during “one-on-one and small group meetings, site visits, [and] conferences.”⁵

Additionally, OCS set the 60-day comment period to conclude on June 21, 2024, five business days before the existing clearance was set to expire. After publishing the 60-day notice on nearly the last possible date that would avoid a disruption to information collection activities, OCS

² *Id.* at 81,919.

³ 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).

⁴ *Id.*

⁵ 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).

encouraged the Network, on multiple occasions, to “submit your comments as soon as possible, in order to expedite the clearance process” to “ensure data collection currently approved under this OMB number can continue beyond June 30.”⁶ As a result, the Network did not have a structured opportunity to provide feedback on the proposal before publication and was urged to truncate its guaranteed 60-day comment period in order to prevent data collection disruptions.

All CSBG National Partners and many other Network stakeholders submitted comments during the 60-day public comment period, with the majority of comments focused on the proposed Version 3.0. We have attached comments submitted by the National Partners during the 60-day comment period and will reference key points from that submission in these comments.

On June 28, 2024, OCS issued a Dear Colleague Letter (DCL) informing the Network that it was submitting Version 2.1 to OMB for review in order to prevent interruptions to data collection, but would delay submitting Version 3.0 for review in an effort give itself more time to review the significant feedback received from the Network during the 60-day comment period.⁷ At that time, the CSBG National Partners, along with 174 Network members and stakeholders, submitted comments via a national sign-on letter that, among other salient points, applauded OCS for taking additional time to review feedback. The letter encouraged OCS to more deeply and intentionally engage with the Network to co-create an updated reporting instrument that fulfills our shared goals of reducing burden and accurately reflecting the incredible impact of Community Action. These comments are also attached for reference.

Despite this request, OCS made further revisions to Version 3.0 and submitted it to OMB for review without any engagement with the Network beyond the agency’s internal review of comments received during the initial 60 days.

Throughout this process, the CSBG National Partners and Network members voiced concerns about the inadequate level of Network engagement and repeatedly requested additional opportunities to engage in a collaborative conversation with OCS about processes to identify solutions for all parties. OCS declined these requests for collaborative engagement and indicated in both its June 28th DCL and responses to received public comments that the Paperwork Reduction Act (PRA) information collection process provides equitable and sufficient Network input to inform updates.⁸ While the Network respects the PRA process, experience shows us that reliance on that process alone is insufficient as input is invited only after decisions on solutions have been made by OCS. This experience is affirmed by recent guidance from the Office of Information and Regulatory Affairs (OIRA) which concludes that early engagement of

⁶ *Id.* at 8.

⁷ Office of Community Services, Administration for Children and Families, U.S. Department of Health and Human Services, ACF-OCS-CSBG-DCL-24-15, CSBG Annual Report and PRA Clearance Process Updates (June 28, 2024)).

⁸ Office of Community Services, CSBG FRN Comment Workbook (October 11, 2024), as referenced in Office of Community Services, Administration for Children and Families, U.S. Department of Health and Human Services, ACF-OCS-CSBG-DCL-25-01, CSBG Annual Report 3.0 30-Day Comment Period (October 11, 2024).

stakeholders is critical to effective and equitable federal agency decision making and priority setting.⁹

Community Action Agencies, state associations, and State CSBG Offices have extensive, practical experience working with the CSBG Annual Report and its data at the local and state levels, making them uniquely positioned to foresee all potential impacts of proposed changes. In the current review process, OCS missed the opportunity to leverage that knowledge by declining to meaningfully engage the Network from the early stages of identifying the problem to designing and drafting solutions. **The Network’s expertise and insights are essential for co-creating solutions that result in a streamlined, relevant, and effective collection tool, and we look forward to future opportunities to partner with OCS on a more transparent, engaged clearance process.**

II. Background on the Community Action Network, the CSBG Annual Report, and its Importance to the Community Action Network

The Economic Opportunity (EOA) of 1964 established Community Action as a central strategy for building local capacity to address the unique causes and conditions of poverty in America’s communities. Although the administration and oversight of funding have evolved since the launching of Community Action, the purpose, as articulated today in the CSBG Act (the Act) remains the same; CSBG serves as core federal funding to support a community-driven response that leverages federal, state, local, and private funding to fortify the nation’s safety net and coordinate a range of strategies and services aimed at having a measurable impact on reducing poverty, revitalizing low-income communities, and empowering individuals and families with low incomes. This approach to addressing poverty is a statutory requirement and continues as the central mission of CAAs sixty years later.

The Act requires the Department of Health and Human Services (HHS) to prepare and submit an annual report to Congress detailing the activities and performance outcomes achieved through CSBG funding.¹⁰ The report must include details on fund utilization, the number and characteristics of individuals with low-incomes served, performance measurements for both states and local CAAs, and the impact of the services provided.¹¹ The CSBG Annual Report is

⁹ Office of Information and Regulatory Affairs, Office of Management & Budget, Executive Office of the President, Broadening Public Participation and Community Engagement in the Regulatory Process (2023) at 10 (“Broad public input is often most useful at an early stage, helping agencies in choosing among priorities or developing potential regulatory approaches. OIRA encourages agencies to consider how they can prioritize early engagement with affected communities, especially when considering an overall regulatory program... This focus on early engagement with communities during the regulatory agenda setting process is consistent with Executive Order 14094, section 2(c), which calls on agencies to proactively engage interested or affected parties” to “inform the development of regulatory agendas and plans,” as well as Executive Order 14091, section 5, which calls on agencies to “conduct proactive engagement, as appropriate, with members of underserved communities [to inform]” “selection of items for their respective regulatory agendas and plans.”)

¹⁰ 42 U.S.C. § 9917(b)(2)-(3)

¹¹ *Id.*

the vehicle through which HHS receives the necessary data from the local and state level to compile this report.¹²

The primary statutory purpose of the CSBG Annual Report is to inform Congress of the performance of the block grant, however, it is also a crucial tool in the management and measurement of performance at the local and state levels. States, charged with oversight of local CAAs, use the CSBG Annual Report as a tool to fulfill statutory obligations to monitor and evaluate CAA performance, ensuring effective use of funds to fulfill CSBG's purposes. For local CAAs, the report is more than a federal and state reporting instrument; it is a tool for demonstrating efficacy in addressing local causes and conditions of poverty, revitalizing low-income communities, and promoting self-sufficiency. State and national associations use the report data to advocate for policy changes and resources that advance CSBG's purpose and goals.

CSBG is much more than a funding source to deliver locally designed programming to address poverty; CSBG supports the network of approximately 1,000 local CAAs that coordinate community-driven responses to address the identified needs in communities across America. Under the Act, States must designate a private nonprofit (or in some cases a public) entity to serve the geographic area. By design, CAAs are governed by a tripartite, local volunteer board of directors that facilitates intentional collaboration across public, private, and community sectors in the designated geographic area. States have the authority and responsibility to maintain this Network and ensure that the Network that receives CSBG funding effectively carries out the goals and purposes of the Act.

The CSBG Annual Report plays a key part in demonstrating the comprehensive impact of CAAs in responding to local needs across multiple domains resourced by multiple funding streams. As mandated by the Act, CAAs conduct community assessments to identify local needs, resources, and opportunities, and develop strategies accordingly. The CSBG funding stream is central to these efforts, and it is often leveraged and amplified alongside other resources. Together, the resources create a holistic, anti-poverty strategy and impacts. By capturing a CAAs full range of performance outcomes, demographic data, and other key metrics, the report enables CAAs, States, and OCS to demonstrate the full effect of CSBG, and maintain compliance with the Act's purpose of reducing poverty and revitalizing communities. **Because the fundamental design of CSBG weaves together several requirements to create local capacity for a flexible, coordinated response to poverty, it is imperative that the CSBG Annual Report captures the full scope of activities and outcomes achieved by a CAA, regardless of the specific role of CSBG in the CAA efforts.**

¹² In 2017, OMB approved a significantly revised CSBG Annual Report. The revised report was developed collaboratively with OCS and the Network over a carefully designed, multi-year engagement. Subsequent to the collaborative updates in 2017, minor changes to the CSBG Annual Report were approved on February 28, 2020 and November 23, 2020. Prior to the current process, the most recent information collection request (ICR) was approved on June 29, 2021 and expired on June 30, 2024. See 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#>.

Given the wide variation in local needs and strategies across the Network, it is essential that the CSBG Annual Report remains flexible. The elements of the CSBG Annual Report, as well as instructions and federal guidance, should capture the meaningful efforts and impacts CAAs worked to achieve during the reporting period. CAAs must be able to report on the diverse services and outcomes that result from their locally driven approaches, ensuring that the report accurately reflects the impact of their work at the state and national levels.

III. Improvements to the Revised Version 3.0

The National Partners and Network signatories would like to recognize that OCS made several updates to the revised Version 3.0 in response to Network feedback and comments received that strengthen the proposed report:

- **The addition of “other” to all services and family National Performance Indicators in Module 3, Section A and Section B.** With approximately 1,000 CAAs charged with developing services to address local causes and conditions of poverty, it is essential that the report include inherent flexibility to allow for the range of services and outcomes a local CAA may achieve. Adding “Other” ensures CAAs can develop and report on the unique impacts of locally developed services.
- **The addition of “Service Delivery Access” in Module 3, Section A, SDA 1-3, services including eligibility determinations, referrals, and case management.** These services are a critical component of the Network’s holistic, person-centered approach that coordinates and delivers comprehensive supports to address the needs of individuals and families. It is important that the CSBG Annual Report accurately captures and reflects this fundamental component of the service integration approach used by most CAAs.
- **The revision of Transportation Services in Module A (SRV 7 a- e).** OCS streamlined transportation services to mitigate the potential for duplication and included services related to individual vehicle supports like car insurance payments or repairs. OCS also indicates that CAAs may report service counts as opposed to the unduplicated number of individuals for several transportation service datapoints, which will allow CAAs with broad scale transportation systems to, for the first time, reflect the scope and reach of their transportation services in the CSBG Annual Report. It is critical for OCS to clarify in instructions and training these are service counts as opposed to unduplicated counts of individuals served and to also clarify this family-level service as opposed to broader community strategies included in Module 4, Section C.
- **The inclusion of employment outcomes for youth and adults (FNPI 1c, 1d, 3c).** CAAs assist community members with finding employment or starting a business regularly; the inclusion of these outcomes is important to ensure the report is reflective of the work of the Network.
- **Revisions to Module 3, Section C: All Characteristics Report.** OCS updated the CSBG Annual Report gender identity and race and ethnicity sections to better align with current best practice and included sources of household income as a characteristic. Gathering and aggregating these characteristics allows CAAs to understand who they serve, dispel common myths about people and families assisted, and use data to make improvements in service delivery.

While OCS made notable improvements to Version 3.0 based on feedback from the Network, significant concerns remain unaddressed. Additional engagement with the Network would have resulted in a deeper, more nuanced understanding and resolution of many concerns rejected by OCS and its contractor. Opportunities for two-way communication and collaboration could have provided valuable insight and context to further strengthen the report at all levels. Our comments highlight items we feel did not receive full consideration or adequate response from OCS in the revised Version 3.0.

IV. Necessity of Information

In general, we agree that the information collected in the CSBG Annual Report is necessary for performance measurement of CAAs and states. The report serves as a key tool for demonstrating the impact of CAA services tailored to the unique needs of local communities, as mandated by the Act. To achieve this, the report must be broad enough to encompass the diverse ways CSBG is used to support the work of CAAs while remaining specific enough to reflect the unique strategies employed to reflect the responsiveness of CAAs to local needs, enabling meaningful assessment at the local and state levels. The report must also effectively capture state performance data, ensuring compliance with federal requirements and supporting states in their oversight responsibilities.

State Accountability Gaps

The Act requires each state to “annually prepare and submit to the Secretary a report on the measured performance of the State and the eligible entities in the State.”¹³ The CSBG Annual Report is required to include “a summary of each State’s performance results” along with the results for eligible entities.¹⁴ The Act mandates that OCS collect State Plans, which detail State administrative approaches, targets, goals, and required State Assurances.¹⁵ In 2015, in collaboration with the Network and as part of a wider performance management framework, OCS established state and federal accountability measures to track, measure, and improve performance and accountability at all levels of the Network.¹⁶ Since the inception of the State Accountability Measures, OCS has used the statutorily required State Plan and the CSBG Annual Report to collect information from states on their plans and progress for eight accountability measures. Several revisions to Module 1 of Version 3.0 remove the collection of information about state performance related to the State Plan and State Accountability Measures, limiting state performance oversight and transparency. While OCS has stated that this data could be obtained through other avenues, such as meetings with the OCS Program Specialists, the CSBG Annual Report is the only PRA-approved data collection tool and should be used to obtain State

¹³ 42 U.S.C. § 9917(a)(2).

¹⁴ *Id.* (b)(2)(3)

¹⁵ The most recent OMB approval of the CSBG Model State Plan information collection occurred on August 9, 2024, and expires on August 31, 2027, *see* Office of Management and Budget, Notice of Action, *Community Services Block Grant (CSBG) Model State Plan Applications* (OMB Control Number 0970-0382) (August 9, 2024), available at <https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=0970-0382#>.

¹⁶ Office of Community Services, Administration for Children and Families, U.S. Department of Health and Human Services, CSBG IM #144 State and Federal Accountability Measures and Data Collection Modernization (October 2, 2015).

accountability information. **We recommend that OCS incorporate the following sections from Version 2.1 that report on required State Plan Assurances and Accountability Measures into Version 3.0:**

- **Version 2.1 Module 1, Section B: Statewide Goals and Accomplishments.** OCS has removed this section, which asks the State to report on progress towards its goals, which is associated with State Accountability Measure 4Sa(i); American Customer Satisfaction Index (ACSI) targets; information on how the State considers feedback from its network received in the ACSI; and management accomplishments of the State and Network.
- **Version 2.1, Module 1, Section G: State Linkages and Communication.** OCS removed the datapoints (G.1 and G.2 in Version 2.1) in this section that gathers detail on state linkages. Section 676(b)(3) of the CSBG Act and State Accountability Measure 7sa call for the state to coordinate, establish, and provide examples of linkages developed to assure effective service delivery and avoid duplication. OCS also removed data element G.6 in Version 2.1 which asked states to report on how they provided feedback to the state Network on its performance in state accountability measures as required by State Accountability Measure 5s(iii).
- **Version 2.1, Module 1, Section H: Monitoring, Corrective Action, and Fiscal Controls.** OCS removed datapoint H.3 in Version 2.1 which asked states to report if they conducted all monitoring as outlined in its policies and disseminated reports to Network members within 60 calendar days as required in State Accountability Measure 4Sa(ii).

V. Quality

The quality of the CSBG Annual Report has improved in this revised Version 3.0 due to changes made by OCS in response to Network feedback in the prior 60-day comment period. However, several quality issues remain, primarily stemming from OCS's focus on reducing reporting burdens. This emphasis has led to gaps that will result in the CSBG Annual Report failing to collect data on critical outcomes and services for common CAA interventions. **While we understand the importance of reducing the reporting burden and share this goal, it is critical that this goal not compromise the quality of the report or its alignment with CSBG's statutory purpose of alleviating poverty and revitalizing communities.**

Outputs Reported as Outcomes in CSBG Annual Report Version 3.0

Historically, the Network has reported family-level interventions and outputs, or the services provided, in the family-level services section of the report (now Module 3, Section A), while outcomes, or the results and changes created by these services, were captured in the FNPIs (now Module 3, Section B). This approach is consistent with most theory of change or logic model practices. However, the proposed FNPIs in Module 3, Section B of the revised Version 3.0 continue to reflect a mixture of outputs and outcomes—a concern that was raised in multiple comments from the Network during the 60-day public comment period. While the updates better reflect change in several indicators, OCS continues to include outputs in the proposed FNPIs.

We recognize that performance indicators (and logic models) can include both outputs and outcomes, but the current mixture in the family outcomes section of Version 3.0 represents a significant departure from established Community Action performance management principles, such as the Results-Oriented Management and Accountability (ROMA) framework, as outlined in OCS's PEAAK (Performance, Evaluation, Accountability, Accessibility, and Knowledge) framework. Several indicators proposed by OCS in Version 3.0 reflect enrollment or participation in a program as an outcome – enrollment and participation reflect milestones or action steps that can lead to change, but they are not in and of themselves change. For instance, FNPI 2a reflects the number of children who received childcare or early childhood services; this is a service count and does not reflect changes in status such as children who were ready to enter kindergarten or children who improved their social or emotional skills. Several proposed FNPIs also measure increased access (such as FNPI 5b the number of individuals with increased access to health coverage), which does not reflect a change in status for the individual – access does not guarantee that an individual will achieve the intended change (such as improved wellness). Reflecting enrollment or participation in a program or receipt of a service as an outcome undermines the core values of Community Action, which prioritize not only the delivery of services but also the creation of meaningful change and performance management best practices.

While we support the inclusion of outputs as important data points for understanding and improving Network performance, it is essential to maintain a clear distinction between outputs and outcomes in reporting. We recommend that OCS move outputs to the family-level services section in Module 3 or reword the outputs to better reflect the change that is created by the service. OCS should also consider collaboration with the network to develop the training and technical assistance efforts to prevent confusion between outputs and outcomes, ensuring consistent and accurate reporting.

Reduction and Streamlining of FNPIs Reduces Quality

The Network's 60-day comments, including those from CSBG National Partners, requested revisions or reinstatement of indicators OCS converted from outcomes to outputs and others that were removed or adjusted. In the disposition workbook OCS provided to the Network to explain the rationale for accepting, rejecting, or partially accepting requested changes we noted the following response themes that require further consideration:

1. **Varied Measurement:** OCS determined certain indicators (e.g., children reach developmental milestones) do not allow for reliable measurement and are open to interpretation (often tagged as lacking face validity) across the Network at the local level. In some instances, OCS indicated the term "improve" or "maintain" was subjective and without a universal definition created concerns around data validity, however OCS also indicated standard definitions could create issues with local flexibility. In these instances, OCS converted the indicator to an output or removed it from the report. It appears this approach was not applied consistently as indicators measuring improvement remain in the revised report. Excluding key FNPIs based solely on the absence of a national measurement tool seems inconsistent and unrealistic (we could report little nationally with this standard) as a federal block grant like CSBG should anticipate and plan for variation in measurement across 1,000 entities, balancing burden with credibility.

2. **Burden:** OCS noted several indicators would require repeated data collection, including pre and post testing, to validate the outcomes. Due to this perceived burden, OCS removed those indicators. However, CAAs often use reliable, validated measurement tools to establish baselines and track progress. CAAs frequently braid funding in their services, and measurement tools are often required by funders. Validation of outcome achievement and tracking progress is central to any quality data collection and performance management system. This type of quality measurement should be supported and advanced, not eliminated.
3. **Underutilization:** OCS indicates it reviewed five years of the CSBG Annual Report to identify “underutilized” datapoints that could be removed to reduce burden. This led to the removal of several high-impact measures directly tied to the purpose of CSBG. We understand CAAs can still collect and report on these eliminated measures using the “other” indicator, but we may miss future opportunities to enhance Network reporting in meaningful ways. We believe that measures tied to predictors of social and economic mobility (e.g., employment, education) are too essential to be removed. There are many drivers of “underutilization”, and without confirmation of those drivers, a better approach would be to keep or revise these indicators and focus on increasing their use where they align with agency goals and services.
4. **Removal of Indicators Used by Key Federal Programs:** It appears OCS intentionally removed indicators used by other Federal programs such as Head Start, Weatherization, and LIHEAP in an effort to reduce burden. For CAAs that operate these programs, removing these indicators achieves little burden reduction and may actually complicate reporting. Often the data from these programs are reported in other sections of the report (including funding leveraged in Module 2, and services provided and people assisted in Module 3), which makes the removal of outcomes inconsistent and obscures the complete picture of CAA impact. Additionally, since subrecipients of these federal programs include organizations other than CAAs, relying on external data from federal offices would not accurately represent Community Action's efforts. Finally, the unique purpose of CSBG, the Act and OCS guidance, has directed States and CAAs for nearly 25 years that reporting and broader performance management should be applied to the work of Community Action, not CSBG alone.¹⁷

It appears many of the justifications were applied inconsistently or with limited appreciation for their ramifications and impacts. We believe these indicator revisions will reduce CSBG Annual Report data quality (e.g., utility/relevance, objectivity/coherence, integrity/credibility) rather than stimulate learning, improvement and advancement.¹⁸

A combination of the factors outlined above create a significant gap in Version 3.0 is resulting from the omission of outcomes commonly used to measure the impact of whole family approaches which seek to simultaneously achieve impact with children and impact with their parents or other care takers. Outcomes tied to parenting services that target increased knowledge, skill development, attitudes, and changed behaviors and conditions related to family functioning

¹⁷ Office of Community Services, Administration for Children and Families, U.S. Department of Health and Human Services, CSBG IM #49 Program Challenges, Responsibilities and Strategies, FY 2001-2003 (May 31, 2001).

¹⁸ Federal Committee on Statistical Methodology, *A Framework for Data Quality*, FCSM-20-04, 30-47 (September 2020).

were removed. Additionally, child focused measures related to developmentally appropriate interventions were also removed or converted to outputs. These parent and child outcomes are crucial to understanding the progress of whole family approaches CAAs use to achieve economic mobility goals. The report no longer includes key whole family indicators such as childhood development milestones, reading at grade level, or parent outcomes like improved caregiving skills and home environments. Excluding standard indicators for childhood and parent outcomes overlooks a critical strategy, informed by research and science that CAAs use to help families achieve social and economic mobility.

Version 3.0 includes FNPIs that are significantly bundled together, diluting the ability to effectively showcase the unique impacts CAAs have on addressing poverty and revitalizing communities. For example, CAAs that operate Weatherization programs that reduce household energy burdens will now report outcomes in a single, combined outcome FNPI 4e – “The number of individuals who experienced improved home health and safety due to improvements (e.g., weatherization, water safety, reduction or elimination of lead, radon, carbon monoxide or fire hazards or electrical issues, etc.)” While the Department of Energy tracks specific Weatherization outcomes, the CSBG Annual Report should reflect the unique outcomes achieved by CAAs, especially those leveraged using CSBG.

We encourage OCS and OMB to reconsider the proposed changes and our attached comments from the 60-day comment period to ensure Version 3.0, Module 3 indicators achieve the following:

- **Include indicators of individual and family level changes in status** (e.g., knowledge, skills, attitudes, behavior) in the CSBG Annual Report that clearly reflect outcomes, not outputs.
- **Reinstate indicators that require measurement tools**, such as pre or post assessments, especially those related to key predictors of social and economic mobility such as employment and education for adults and children. Address concerns about burden and face validity through improved guidance and training.
- **Reconsider removal of indicators due to underutilization for key indicators related to the purposes of CSBG.** Work with the Network to improve guidance and training and monitor utilization.
- **Reconsider the removal of measures used by key federal programs common to Community Action such as Head Start, LIHEAP, WAP.** Additionally, consider unbundling indicators of common programs such as Weatherization so that a clear story about the role of Community in these programs can be clearly presented.

As it relates to outcomes and more, it is important to remember that CSBG is not a program but a funding stream that supports CAA capacity and essential services and strategies for reducing poverty and revitalizing communities. CAAs coordinate a range of services responsive to local needs. Removing key outcomes related to employment, childhood development, and energy services risks an incomplete view of the comprehensive nature of CSBG’s economic mobility impact. We recommend reinstating these outcomes, as proposed in our comments from the 60-day comment period, to ensure the report fully reflects the Network’s work and CSBG’s role in maximizing this impact.

Reduction and Streamlining of Individual and Family Services Reduces Quality

In Version 3.0, OCS significantly reduced the number of reportable services to streamline the CSBG Annual Report and lessen the reporting burden on the Network. While the removal of duplicative services can alleviate this burden, excessive consolidation risks compromising the report's quality and comprehensiveness, as well as its alignment with CSBG's statutory expectations. By merging services to the extent that the specific efforts of the Network are underrepresented, the breadth and depth of essential services may be lost.

When reporting, CAAs select only the data points that best reflect their unique efforts, so reducing reportable services does not inherently decrease the reporting burden; instead, it diminishes the clarity and overall quality of the report. Streamlining must be balanced to allow the Network to accurately convey its diverse strategies to report and measure change. The CSBG Annual Report must serve as a flexible menu of options reflecting locally driven efforts. **Notable gaps detailed in comments from the 60-day comment period which must be addressed include specific services related to parenting supports and skills development; VITA (as its own service); asset building (as its own service); housing counseling (beyond tied only to eviction prevention); healthy homes services; and disaster response services (beyond Module 4 additions).**

Streamlining of All Characteristics Report Reduces Quality

Version 3.0 Module 3, Section C no longer includes a section (Version 2.1, Module 4, Section C items E and F) for respondents to provide information on data sets that could not be unduplicated. Previously this section of the report provided a method for respondents to identify programs, and the number of individuals and households served that could not be unduplicated. The purpose of collecting this information was to increase understanding of individuals and/or households served, but due to system interoperability barriers an unduplicated count could not be obtained. Understanding this information can provide important context to OCS and other users of the Report. We understand OCS determined that these items were underutilized nationally and suggested states and CAAs could continue to collect this information if needed. We believe this information could be useful at a national level to understand the full scope and scale of the Network's impact and challenges. Underutilization is likely attributed to training challenges and not burden. We recommend retaining this section in demographics reporting and ensuring report instructions provide clear guidance.

Consistency and Technical Corrections

Updating a report of this magnitude is a significant undertaking, and we applaud OCS and its contractor for its efforts to update, streamline, and produce a quality final information collection instrument. Potential areas that may need technical corrections or other edits include:

- In Module 2, Section A, A.1.i refers to Table A.4 for further information, but table A.4 is not included. If this is not a technical error, this table should be included in the revised Version 3.0 to capture important details and affirm the allowability of CSBG dollars for these central purposes.

- While the transportation domain was added, it is only represented in Module 2 and in Module 3, Section A; there are no FNPIs or the option to report FNPIs related to the Transportation domain, and it does not appear in Module 4, Community Level. We recommend OCS incorporate Transportation throughout the report for consistency.
- In Module 3, Section A – Education Services, the service headers and service numbering schema do not align (e.g., Adult Education and Skill Development Programs reference SRVs 2l – 2q, but reflect SRVs 2l – 2p, and subsequent headers are affected).
- In Module 3, Section A – Housing Services, the services headers and service numbering schema do not align (Housing Assistance references SRV 4a – b, but reflect services 4a – 4c, and subsequent headers are affected).
- In Module 3, Section A – Civic Engagement and Community Involvement Services, SRV 6c is missing, affecting subsequent services and headers.
- In Module 3, Section B – Income and Asset Building, two FNPIs are numbered FNPI 3d.
- In Module 4, Section B, there are added domains of community support strategies and emergency management strategies that do not align to Module 2, Section A.1. We recommend that domains be consistent across all modules of the report.

Community Level Change

Reduction of poverty requires more than providing services and supports to individuals. Since its inception, Community Action has engaged in improving community conditions as well as helping individuals and families. The purpose and goals of CSBG speak directly to pursuing and achieving community-level change. Community level initiatives like housing development, job creation, and addressing structural barriers are included in the work of many CAAs. However, since the significant revisions to the CSBG Annual Report in 2017, community-level work has been severely underrepresented in the CSBG Annual Report. Inconsistent guidance from OCS and lack of adequate training following those revisions, along with OCS’s restriction of Module 3 reporting to only new initiatives, led to underreporting of community efforts.

Additionally, OCS's designation of Module 3 as "optional" over the last several years has further reduced Network engagement, hindering the full portrayal of CAAs' impact at the community level. **OCS did not accept our request to remove the “optional” framing from Module 4. We urge OCS to reconsider this decision.** CAAs that identified community level change needs and goals should report on their efforts. OCS’ ongoing approach is resulting in underreporting of the impact of CSBG and conveying to Congress that CAAs are not effectively driving community change/revitalization. OCS indicated in their response to the first round of comments that some states and local agencies may not have the capacity to conduct community level change efforts due to their funding levels. As is the case for the services and outcomes sections of the report (Modules 3 and 4), CAAs only report on areas that correspond with the work they plan and implement. If an agency does not have capacity, then they would not report. For agencies that are pursuing community level change, reporting would be expected.

We agree with OCS’ comments that additional training to enhance community level change reporting is needed. We hope that OCS will consider intentional, proactive communication with the network to discuss challenges with community level reporting, including challenges related to the collection instrument and guidance, to inform future updates to the report. In the

meantime, we urge OCS to re-emphasize the importance of community-level reporting and provide quality technical assistance in partnership with the Network. The inclusion of ongoing community initiatives and their impact in Module 4 is essential to fully reflect CAAs' contributions. Refer to our 60-day comment submission for more detailed recommendations.

VI. Burden

The CSBG National Partners and Network Signatories appreciate that OCS recognizes the burden produced by the CSBG Annual Report on local, state, and national levels. As evidenced in the Network comments in response to the 60-day comment period, the drivers of this burden are multifaceted. While our comments include recommendations on ways to reduce the reporting burden, network engagement is required to better understand the drivers of the burden.

Anticipated Burden Produced by Proposed Updates

The proposed changes in CSBG Annual Report Version 3.0 will impose a significant burden on the Network due to the extensive revisions required for existing reporting systems. While OCS notes that it provides SmartForms at no cost to the Network, CAAs must maintain sophisticated data systems to capture the required data to generate the CSBG Annual Report. OCS indicated that these local systems are beyond its scope of responsibility, but this overlooks the significant burden created by the proposed changes prompted by OCS. **Given the changes as proposed, nearly every data point will need recoding due to the restructuring of modules, resulting in significant costs for CAAs and states.**

The shift to reporting on the Federal Fiscal Year (FFY) starting in 2026 will create a tremendous burden for those states impacted. While OCS indicated it feels these impacts will be minor, feedback from States suggests otherwise as evidenced by the public comments received in response to the 60-day comment period. Collectively, the Network will need to update contracts, adjust software systems, process flows, and retrain staff—efforts that will require substantial time and financial resources. For some states, this shift will result in the need to collect additional reports to reconcile state and federal reporting periods.

Burden Estimate

In prior comments, CSBG National Partners and Network stakeholders identified several questions for OCS clarification that remain unaddressed. Understanding OCS' method for determining burden estimates is crucial for providing thoughtful feedback. We reviewed the burden hour estimates, which are statutorily required as part of all ICR processes, across several CSBG Annual Report clearance activities in recent years, which raised questions about the burden estimates. We 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 ¹⁹	60-Day	2.0	242
January 22, 2020 ²⁰	30-Day	2.0	697
November 19, 2020 ²¹	Expedited (60 Day)	2.0	697
April 26, 2021 ²²	30-Day	2.0	697
April 22, 2024 ²³	60-Day	2.1	493
April 22, 2024 ²⁴	60-Day	3.0	260
June 28, 2024 ²⁵	30-Day	2.1	493
October 9, 2024 ²⁶	30-Day	3.0	426

These wide-ranging burden estimates raise several questions; for example, what accounts for the decrease in estimated hours per response between Versions 2.0 and 2.1, given that the latter includes only “clarification revisions”²⁷ **We recommend OCS provide clarification and additional information regarding the process or formula used to determine the average burden hour estimates to help the Network assess the estimated burden hours per CAA response for various collections.**

Although we do not have insight into the formula used to calculate the anticipated burden, we believe OCS overestimates the burden reduction associated with Version 3.0. This overestimation is tied to the significant investments required to transition to the new report, the switch to reporting on the federal fiscal year, and the assumption that reducing data points will reduce burden. While OCS suggests that fewer data points, particularly those removed due to “underutilization,” will reduce burden, the primary drivers of reporting challenges are not the number of unique outcomes and services in the CSBG Annual Report given that CAAs only report on data points tied to their efforts. A significant portion of the burden stems from the processes required to aggregate people, services, and outcomes to get to unduplicated counts – an effort that is not alleviated by reducing data points. Collaboration with the Network could provide valuable insights into the true nature of the reporting burden and its impacts, allowing for the development of solutions that reduce burden without compromising the report’s integrity.

¹⁹ Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Report (OMB No.: 0970–0492), 84 Fed. Reg. 52,506 (proposed Oct. 2, 2019).

²⁰ Submission for OMB Review; Community Services Block Grant Annual Report, 85 Fed. Reg. 3,694 (proposed Jan. 22, 2020).

²¹ 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).

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

²³ 89 Fed. Reg. 29,339.

²⁴ *Id.*

²⁵ 89 Fed. Reg. at 54,005.

²⁶ 89 Fed. Reg. at 81,918-9.

²⁷ 89 Fed. Reg. 29,339.

Recommendation for Ongoing Engagement to Reduce Burden

We encourage OCS to establish mechanisms for ongoing engagement with the Network to co-create future updates to the CSBG Annual Report. Ideally there would be multiple methods that could include using the existing CSBG Data Task Force, as well as topic-specific work groups (e.g., community level initiative measurement and reporting, data validation and integrity processes) to harness the experience and expertise of the Network and facilitate ongoing two-way communication between the Network and OCS. By engaging the Network directly, OCS can ensure that reporting processes align with practical realities, reducing unnecessary complexities and better preparing CAAs to manage changes. Ongoing engagement would not only ensure that the reporting process remains responsive to the Network’s needs but would also provide a platform for addressing reporting burden while ensuring that the CSBG Annual Report captures the full scope of the Network’s critical work and impact. In the near-term as the Network transitions to the new report, it will be important for OCS, or others working on their behalf, to increase engagement with the Network to guide the development of targeted, responsive training and technical assistance.

To further reduce the reporting burden associated with the transition to the new report, we recommend that OCS not only provide training and technical assistance but also allocate additional financial support to the Network. Although OCS suggested members repurpose existing resources to cover costs, this effectively places an unfunded mandate on the Network. OCS must clearly and directly address the significant costs associated with updating databases and systems. We urge OCS to provide additional resources and support, ensuring that local agencies can implement these changes without diverting funds from critical services. Further, these resources should not come at the expense of current training and technical assistance efforts – it is crucial that updating the report does not further divert resources needed to support a strong and responsive Network.

Finally, OCS could convene software vendors who provide data systems to CAAs to advocate for and support enterprise-wide updates. By coordinating efforts with vendors, OCS can help standardize necessary changes across platforms, easing the financial and operational burden on CAAs and State Offices. This collaboration would ensure that system updates are compatible, cost-effective, aligned with the reporting requirements, and accessible to the entire Network.

For more recommendations related to burden reduction, we encourage OCS to review our 30-day comments on Version 2.1.

VII. Clarity

Implementation Timeline Clarifications

One critical point of clarification is the timeline for optional use of the CSBG Annual Report Version 3.0. OCS’s Dear Colleague Letter stated that the report could be used as an option for the FFY 2025 report, while the FRN suggested the instrument would be optional for FFY 2026. This discrepancy needs to be addressed to ensure accurate planning. Given the significant

changes introduced in Version 3.0, the timeline suggested in the FRN, while still ambitious, is more realistic for ensuring a smooth transition. The substantial differences between Version 2.1 and Version 3.0 require sufficient time and resources for CAAs, State CSBG Offices, and software vendors to implement and test new data collection and reporting processes effectively. This transition cannot be rushed, as the complexities of the new system will take time to integrate smoothly at all levels.

Development of Clear and Collaborative Guidance, Training, and Technical Assistance

Clear and collaborative guidance, supported by comprehensive training and technical assistance, is essential to ensure that CAAs can effectively report their activities and outcomes under the new system. OCS should work in partnership with the Network—including CAAs, State Associations, and CSBG State Offices—to develop this guidance. Their daily experience with the data provides valuable insights to ensure that instructions are clear and align with the practical realities of large-scale system transitions. Involving these stakeholders will foster collaboration and build a shared understanding of the necessity for these changes, ultimately enhancing the Network’s ability to track, analyze, and demonstrate both services and impact. To support this guidance, it is equally important to provide ongoing training and technical assistance at both the local and state levels. Given the complexities of the new reporting requirements, continuous support will help CAAs meet expectations effectively. OCS should collaborate with CSBG National Partners and Network experts to co-develop training that is relevant and practical, addressing the unique challenges CAAs face. By grounding training in real-world applications and best practices, we can improve data quality while reducing the reporting burden.

The CSBG National Partners stand ready to assist OCS in facilitating these collaborative efforts to ensure that the guidance, training, and technical assistance are timely, supportive, and aligned with the Network’s needs.

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

In summary, we recommend the following additions, revisions, and modifications to enhance the CSBG Annual Report to ensure required information about state performance and accountability is collected.

- **Revise Family National Performance Indicators (FNPIs)** to reflect outcomes. OCS should either refine FNPIs to better reflect the change achieved through the provision of services described or clearly designate those FNPIs that are outputs as process measures.
- **Incorporate FNPIs that are paramount to the Community Action approach and story**, including those related to achieving social and economic mobility via a whole family approach, and weatherization outcomes.
- **Ensure that outcomes are not so streamlined that the story of CSBG impact is not easily discernible.** Streamlining of FNPIs cannot come at the cost of fully telling the Community Action story.

- **Restore data points that were eliminated due to reporting to other federal agencies.** The CSBG Annual Report is meant to reflect the entirety of outcomes achieved by the Network.
- **Restore services that were removed or streamlined which are paramount to the Community Action approach and story,** including those related to parenting supports and skills development, VITA, asset building, housing counseling, healthy homes services, and disaster response services.
- **Restore Version 2.1, Module 4, Section C items E and F** which allow CAAs to report datasets that otherwise cannot be unduplicated.
- **Restore Module 2, Section A, Table A.4** to capture detail about how CSBG capacity-building dollars are utilized.
- **Ensure domains are consistent across the report** by incorporating transportation FNPIs and CNPIs to ensure consistent reporting about transportation efforts across modules.
- **Remove “optional” framing from Module 4 – Community Level,** re-emphasize the importance of community-level reporting, and provide quality technical assistance in partnership with the Network.
- **Establish mechanisms for ongoing engagement with the Network** to co-create future updates to the CSBG Annual Report.
- **Allocate additional resources** to support the Network transition without taking away from current training and technical assistance contracts.
- **Partner with the CSBG National Partners and Network experts** to co-develop and deliver comprehensive reporting guidance training and technical assistance that is tailored to the unique needs of Network members.

IX. Closing

On behalf of the CSBG National Partners and Network Signatories, we extend our appreciation to OCS for the work done to update the CSBG Annual Report. While the revisions in the 30-day comment period of Version 3.0 represent progress, there are still areas that require further revision and refinement to meet the needs of the Network.

The challenges highlighted in this letter point to a broader issue—the limited engagement of the Network, or those most impacted by these updates, in shaping these updates. **We strongly believe that our collective efforts are most effective when OCS and the Network work closely together and collaboratively.** We share the common goal of creating a report that reduces burden while fully capturing the significant and diverse impact of the Network. Encouraging deeper collaboration and co-creation of solutions with the Network will ensure that the CSBG Annual Report is a more accurate reflection of the good work CAAs do every day to help people and change lives. The collective expertise of CAAs, State Associations, and State CSBG Offices is a powerful tool for crafting a reporting instrument that aligns with statutory requirements and reflects community-level realities.

We invite OCS to engage with the Network more deeply and with greater frequency advance the work and collaborate for success. Together, we can ensure the CSBG Annual Report fulfills its role in capturing and reflecting the critical work of Community Action.

Sincerely,

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

Allison Ma'luf, Esq.
Executive Director/General Counsel
Community Action Program Legal Services

Cheryl Williams
Executive Director
National Association for State
Community Service Programs

Barbara J. Mooney, Ed. D
Director
Association of Nationally Certified ROMA
Trainers and Implementers

Attachments:

NCAP 60-day Public Comments on CSBG Annual Report 2.1 and 3.0
CAPLAW 60-day Public Comments on CSBG Annual Report 2.1 and 3.0
NASCSP 60-day Public Comments on CSBG Annual Report 2.1 and 3.0
ANCRT 60-day Public Comments on CSBG Annual Report 2.1 and 3.0
CSBG National Partners 30-day Public Comments on CSBG Annual Report 2.1