

Office of Community Services  
Administration for Children and Families  
Department of Health and Human Services  
330 C Street, SW  
Washington, DC 20201

Dear Office of Community Services Staff:

Following consultation with the Virginia Community Action Network, our office writes (as the CSBG State Office) in response to the Office of Community Services' (OCS) release of the Dear Colleague Letter (DCL), ACF-OCS-DCL-2409.

First, we would like to acknowledge the efforts to improve, strengthen and streamline the CSBG Annual Report. There are proposed changes that could provide long-term benefits to the Community Action Network, and we would like to recognize the good work that has gone into preparing these recommendations. For your consideration, we have identified, for both the Virginia State CSBG office and our eligible entities, short-term (and potentially long-term) impacts that will require mitigation, and a few overall questions/concerns.

**Shift to Federal Fiscal Year:** In the CSBG Annual Report v. 3.0., OCS proposed that all modules would be reported on using the Federal Fiscal Year (October 1 to September 30). Currently, we grant funds using the state fiscal year and our reporting is collected using the state fiscal year. As a state office we would need to modify contract dates and make significant changes to our state database systems to accommodate this shift. For our eligible entities, this would require time-consuming and costly work to update systems, processes, and records. It also disrupts financial comparability, making comparing previous fiscal years' financial statements difficult. This would increase our short-term burden in order to become compliant with the shift in reporting timeframe.

**Shift from outcomes to outputs:** Our network has prioritized the impacts of outcomes over the last several years. The ability to show how an agency can impact a client through outcomes is a powerful storytelling tool. Many of the new FNPIs are focused on outputs rather than outcomes. Several of the NPIs are similar to the services, rather than a result of the services. We have concern regarding how the network will be able to continue to show the impact of the great work being done in their communities with the loss of outcomes.

**Services across multiple domains:** In Virginia we are prioritizing the whole family concept. The proposed changes to eliminate many services in category 7 (specifically: FNPI 7a, SRV 7a, SRV 7b, and SRV 7c) would negatively impact the ability of our agencies to show the specific impacts through the whole family work being done in Virginia.

**Significant changes to services and outcomes:** The elimination and combination of a vast majority of the services and outcomes will create the need for the state to completely overhaul the state database. This will come with a significant cost burden as well as a significant time burden for state staff. All training materials will need to be updated which includes many webinars and informational templates. Also, agencies with database systems will need to update their systems and training materials for agency staff. There are several key services and outcomes that we would like to see stay in the report, as they help

tell the story of the great work being done in our communities. Those key services and outcomes we would like to see remain are: SRVs = 2i, 2j, 3m, 3o, 4p 5hh, 5kk, 5mm, 5nn, 7a, 7b, 7c, 7m. FNPIs =1e, 2a, 2b, 2e, 3b, 3d, 3e, 3g, 3h, 3i, 4d, 5d. One area of burden typically discussed is unduplicated count, this area was not addressed by the elimination of services and outcomes, allowing for service counts vs. people counts would eliminate some of the burden of unduplicated counts and give a better picture of the services provided at an agency.

With the proposed changes, we will need additional training and technical assistance for both the CSBG State Office and the eligible entities. We hope this training will be provided at the beginning of the process so we can ensure a smooth transition to the new reporting requirements. We also will need support for our required systems changes, the systems changes will have a significant cost, which will need to be covered with our administrative funds, this would not allow us to have as much available for training and technical assistance.

We look forward to working with OCS and our national partners in this effort to streamline reporting requirements.

Sincerely,

The Virginia State CSBG Office

Abby Hanks, CSBG Program Manager

Matt Fitzgerald, Director, Office of Economic Opportunity