



August 15, 2016

Administration for Children and Families
Office of Planning, Research and Evaluation,
ATTN: ACF Reports Clearance Officer
330 C Street SW.
Washington, DC 20201

infocollection@acf.hhs.gov

RE: CSBG Annual Report OMB PRA Clearance FRN #1

Dear Mr. Sargis:

The Community Action Partnership is deeply grateful to the federal Office of Community Services for its ongoing support of the Community Action Network and its investments to improve and modernize the CSBG performance measurement and management system. The Partnership is the national membership association for local Community Action Agencies and State Associations, and includes many State CSBG Offices among its membership. The Partnership is recognized as a national CSBG partner for training and technical assistance, has been the grantee for the CSBG Organizational Standards Center of Excellence for the past four years, has been an active member of the current ROMA Work Group, and participated in the CSBG Performance Management Task Force in 2012-2013. We are well versed in the CSBG Performance Management Framework and welcome the opportunity to provide OCS and OMB with our comments and recommendations for ROMA Next Generation and the CSBG Annual Report. We hope to build on the recent track record of collaboration that led to the release of the State and Federal Accountability Measures, the Model State Plan, and the CSBG Organizational Standards. It is important to note that these efforts succeeded in no small part because of broad participation by stakeholders at all levels and a final product that reflected extensive consideration of the input, needs, and interests of the Community Action Network as a whole.

There are elements of the new CSBG Annual Report that are an improvement over the current "CSBG IS Report". These include separating services and strategies from outcomes, updating the demographics report to include items such as veteran status, and expanding the opportunity for local agencies to report on their community-level work. However, the Partnership still has significant concerns regarding many elements proposed (including how some of the potentially positive changes are deployed) and the comments in this document are a synthesis of feedback collected over the past few months from hundreds of individuals from local Community Action Agencies, State Associations, State CSBG Lead Agencies, and national partners. Unfortunately, we must note that many of our recommendations made during the informal comment period and submitted April 13, 2016 were not

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included in the current OMB Clearance Package, and the Partnership has expressed deep disappointment to OCS and the National Association for State Community Services Programs (NASCSPP) about this lack of response. We have continued working since April, however, to convey our concerns and make reasonable recommendations and we remain committed to producing the best product possible for the CSBG Annual Report.

We hope OCS and the Community Action Network will reach a compromise on the final submission for OMB clearance later this fall and believe the progress made to date since January 2011 is significant. Along with OCS, we want to get the development work behind us so we can move forward together with the implementation of ROMA Next Generation. However, we must be sure the final product has value at all levels; is doable given limited financial resources, technological capacity, diversity of the Network, and limited T/TA funds; does not place an undue burden on states or local agencies; and truly improves our performance management system. As the package currently reads, we have significant concerns.

General Comments

This letter provides detailed comments and recommendations based on the format requested in the Federal Register. Overarching concerns with the currently proposed CSBG Annual Report include:

- **Reporting requirements that exceed agency capacity for data collection, integration, and analysis.** Many agencies struggle under the burden of collecting and reporting data for multiple programs that use different – and often incompatible – software and systems. The CSBG Annual Report as currently proposed is unduly burdensome and underestimates the time required at the local level to collect, integrate, and report data at the agency level.
- **Reporting requirements that produce data of limited utility for CAAs and State CSBG Lead Agencies.** The Partnership strongly believes that all data collected for the CSBG Annual Report should have a clear purpose and use for local agencies and State CSBG Lead Agencies. Caution must be taken if data reporting is included that is not intended to be aggregated and used at the state and federal level.
- **Reporting requirements that would be better characterized as “best practices”, voluntarily adopted, and supported with additional training and technical assistance.** As noted in our April 2016 submission, investing in training and technical assistance to increase the analysis of data or to implement focused community-level initiatives using developing formats (e.g. Collective Impact) would be a much wiser use of limited CSBG resources than requiring the reporting as proposed.
- **Concerns over allocation of scarce resources are not adequately addressed.** The single greatest barrier to improved data collection and analysis is under-resourced and fragmented management information systems at the local agency level. The investment of limited resources in the creation of new state-level systems fails to correct the problem as its source and may directly trade off with improvements that could be gained at the agency level through coordinated support of capacity building efforts.

Primary Concerns

The Partnership’s responses to the four questions listed in the Federal Register and our specific comments on individual modules are included below. In summary, our recommendations in each module include:

Module 1: State Administration

- **Significantly modify Question D2 to allow for better and more accurate reporting.** Question D2 does not allow for State CSBG Lead Agencies to report the number of agencies not meeting 100% of the Organizational Standards thus providing one, very limited and difficult to consistently achieve metric. It is important to including reporting on the Organizational Standards; however, the proposed format for reporting is problematic.
- **Modify Question D3 to reflect the purpose and intent of Technical Assistance Plans and Quality Improvement Plans.** Question D3 does not clarify that a Technical Assistance Plan rather than a Quality Improvement Plan is the preferred option for agencies not meeting Organizational Standards as per the guidance provided in OCS IM 138.
- **Remove or significantly modify Question B7.** The question places an undue burden on State CSBG Lead Agencies and needs to be modified to be reflective of data collected.

Module 3: Community Level

- **Remove the use of all *rates* and *percentages* in Sections A and B.** The use of rates (e.g. violent crime rates, infant mortality rates) for local agency reporting to the state CSBG Office on community-level work is an inappropriate use of social indicator data. Community level change is affected by a wide variety of factors and the use of such indicators for reporting success or impact by a local agency's efforts will not provide data that is useful. The use of percentages for community work is also misleading and inappropriate for use in reporting on local agency performance.
- **Remove "Collective Impact" options from the reporting tool.** This is an area best left to training and technical assistance because (1) the data has little utility aggregated to the state and national level; and (2) "Collective Impact" is only one strategy for doing community-level work and should not be privileged over other approaches.

Module 4: Individual and Family Level

- **Remove Section A, *Characteristics for NEW Individuals and Households Report*, in its entirety.** This report (1) is not necessary for the proper performance of agency functions; (2) the collection of demographic data alone does not provide the agency or State CSBG Lead Agency with meaningful information for assessments; (3) there are significant problems defining who constitutes a new individual and/or household; (4) the data has very little meaning when aggregated and reported at the state and federal levels; and (5) many current agency data systems are challenged to produce this information without significant modifications.
- **Remove the 180 day reporting indicator in Section C (except in cases of WIOA) and change the introduction language that currently states this is the expectation that all agencies should work towards.** Local agencies lack the capacity (staff, funding, access to customers for follow-up, technology) to track data over such an extended period of time; and (2) many agency data systems lack the appropriate fields to track this data.
- **Remove the proposed stability indicators in Section C.** Neither option provided is appropriate to include. (1) The first option provided is duplicative with regards to data collection, does not provide meaningful information, and poses significant challenges with local agencies' data systems; and (2) the second option uses a scale (the Consumer Financial Protection Bureau's Financial Well-

Being scale) that is based on a construct not designed for use with a low-income population and will therefore produce misleading data.

General

- **Reinstate the Agency-Level Goal to the proposed ROMA goals proposed in the CSBG Annual Report.** Agency capacity is critically important to report and measure because it (1) directly impacts the ability of agencies to produce successful outcomes; (2) provides a way for agencies to formally report on improvements to management, operations, and infrastructure; and (3) helps State CSBG Lead Agencies assess training and technical assistance needs.
- **Address the unique issues of Public entities that receive CSBG.** Public agencies (sub-grantees) that sub-contract most or all of their CSBG funding to other service providers may face added challenges of requiring their grantees to collect data in accordance to the proposed report.

The balance of this letter provides additional detail about this concerns and specific recommendations for how to address them using the format requested by OCS and NASCSP.

Responses to the Four Questions

Question 1. Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility.

While there are elements that may be helpful, there are a number of areas detailed below where the collection of information does not meet the threshold of necessity or utility. The package as proposed in its entirety is overly burdensome, contains reporting tools and indicators that will provide information that is not meaningful or valid for the purposes outlined, and extends beyond the reach of the Community Services Block Grant (CSBG). However, with modifications, a system for collection of information can be developed that improves the performance management of the agency, has practical utility, and can assist with community-level change efforts. Detail is provided here outlining where changes need to be made to reach a level of workability and utility.

1. **Module 1, Question D2: Modify the options CSBG State Lead Agencies/grantees have when reporting to OCS on CSBG Organizational Standards to allow for a broader range of responses.** As noted below, there are significant challenges with the way this information is being reported and creates a misuse of the Organizational Standards. Expecting constant perfection is unrealistic and does not have practical utility for local agencies or the State CSBG Lead Agency. As proposed, the single metric the State Agencies will report on will be the number of eligible entities that meet 100% of the CSBG Organizational Standards. To increase utility of the information, State Agencies should have the option to report the number of agencies at a variety of thresholds that still delineate strong performance or allow for a more accurate reflection of the training and technical assistance needs. For instance, State Agencies should be able to report the number of local agencies that have met 100%, 90%, 80%, 70%, 60%, 50%, and less than 50% of the standards. This will allow for the collection of more accurate information; better tracking of results over time; and better, more efficient investment of training and technical assistance. Without the change, OCS has proposed a poor, impractical performance measurement metric; by adding thresholds OCS will move the needle toward better overall performance management and practical utility.

2. **Module 1, Section D3: Modify the language to reflect the stated intent as well as the spirit of IM 138 to reflect the preference for a Technical Assistance Plan when Organizational Standards are not met.** The current language conveys that a Quality Improvement Plan (QIP) is the preferred option if an eligible entity has one or more unmet organizational standards. OCS IM 138 clearly articulates the Technical Assistance Plan (TAP) is the preferred option.
3. **Module 4, Section A: Remove the Characteristics for NEW Individuals and Households Report.** This report has no practical utility at the local level given the time and expense to create it at each local agency. This report is not necessary for agency performance, and the intentions outlined by OCS for its use are not reflective of how local agencies and states look at their communities to assess needs, develop programs, and report progress. It also lacks utility at the state level given that data such as this aggregated to the state level will be skewed by large population centers, decreasing the practical utility of the data even further. In addition, many agencies may either lack management information systems with the capacity to disaggregate this type of data from its overall customer database, or struggle to integrate the required data given their use of multiple (and sometimes incompatible) reporting systems. In addition, as many local agencies serve families over time, with no definition of “new” being provided for review, the CSBG Network will be unable to implement this report consistently. Defining an individual or family as new becomes challenging when they may receive different services over many years (e.g. Early Head Start, child care, after school programs, youth programs, job training, WIC, food boxes, LIHEAP, etc.). This poor performance measurement tool will not have practical utility to improve performance management and should be removed.
4. **Module 3: Remove the Community Outcome Indicators/Social Indicators that include percent or rates.** The inclusion of percent and rates is inappropriate and will provide meaningless data when aggregated beyond individual initiatives. Such social indicator data has validity for geographic areas much larger in than those addressed or targeted by local agency projects. This validity is lost when the scale is smaller, and accepted data comparison points become unavailable. Having individual agencies report on rate change at the community level on social indicators does not provide information that is usable. Consider an option where local agencies report the types of community-level work they are engaged in, the number of initiatives, and the types of social indicators they review at the local level as part of their work; but remove the reporting on the change to those social indicators on the Annual Report. Invest in training and technical assistance on how to use such data. The social indicators to remove include but are not limited to: community level graduation rates, infant mortality rates, child and adult obesity rates, homelessness rates, home ownership rates, immunization rates, teen pregnancy rates, substance abuse rates, etc.
5. **Module 3: Remove Collective Impact from all reports.** Collective Impact is simply one set of strategies for doing community-level work and while CSBG eligible entities are engaged in such efforts, privileging one approach given the broader range of options for doing community-level work is inappropriate and unnecessary. This should be removed and included in training and technical assistance endeavors.
6. **Module 4: Remove the Stability Indicators.** The indicators selected and included in the clearance package are not helpful or practical when reporting customers stabilized as a result of the eligible entity’s work. One option duplicates data already collected and the second uses a tool that defines financial stability based on a construct the uses assumptions drawn from the general population, not low-income individuals and families specifically. Because financial well-being means something

very different for the low-income population in comparison to the general population, use of the scale will produce data of limited utility.

7. **Address the unique issues of Public entities that receive CSBG.** Public agencies (sub-grantees) that sub-contract most or all of their CSBG funding to other service providers may face added challenges of requiring their grantees to collect data in accordance with ROMA Next Generation requirements since it may limit agencies to contracting with providers that have the requisite data collection capacity or require additional technical assistance to meet the reporting requirements. This challenge is not addressed in the proposed reporting package.
8. **Include a 4th ROMA Goal: Agencies Increase their capacity to achieve results.** Reinstate this national goal that addressed the critical role the network of local agencies serving 99% of US counties plays in addressing poverty. Reasons for exclusion have been inadequate to date. Because agency capacity is critical to the ultimate success of programs and services, it is important to clearly state this objective in the overall National Goals. This also highlights the broader need of the Network for ongoing training, technical assistance, and general capacity-building supports.

Question 2: The accuracy of the agency's estimate of the burden of the proposed collection of information.

Based on feedback from the broader Community Action Network, the Partnership is concerned that the estimate of the burden of the proposed collection of information is low. The reasons for this include:

- The current IS survey includes 300+ data elements to report. As proposed, the CSBG Annual Report increases this number significantly. This increased burden of reporting comes with no new resources.
- The burden on the vast majority (and perhaps all) local agencies is not impacted by the implementation of the Online Data Collection system (OLDC). To comply with the draft CSBG Annual Report local agencies will need to modify existing systems.
- Many agencies lack management information systems with the capacity to provide the required data. Data fields required for ROMA Next Generation reporting may not be mirrored in those used by agencies. In addition, many agencies use multiple (and sometimes incompatible) reporting systems which adds to the time necessary to provide the data.

What seems to be clear is that the full current national burden for the current IS Report has not been established giving a challenge to establishing a baseline to work from which to estimate. In addition, variance across states and local agencies is significant and the individual burden largely depends upon the current state of data collection and management systems at each agency and in each state.

As noted, it is not clear how the burden for local agencies is decreased by the online data collection system described in the by OCS. OCS' Dear Colleague Letter of June 17, 2016, states, "Aware of the reporting burden the proposed Annual Report will entail, OCS will decrease that burden by establishing an on-line automated system for use by the states and – at the discretion of the states – the local agencies, for reporting that allows in many instances auto-populating data from one year to the next and a variety of data entry processes (e.g. manual entry and automatic upload)." It is important to note, this online automated system may benefit State Lead Agencies (grantees), but will most likely not benefit local Community Action Agencies (sub-grantees). Sub-grantees will still need systems that track customers, services, outcomes, and given the requirement of many funding sources (including other federal

Department of Health and Human Services funding) requires additional and sometime separate data collection systems. State grantees do not have the funding or capacity for the most part, to create systems or support local agencies to develop systems that will streamline or decrease the burden outlined here.

Question 3: The quality, utility, and clarity of the information to be collected.

As noted above in Question 1 and below in the detailed comments by module, several elements of data to be collected under this proposal have no meaning at the state and federal levels, and only have value, meaning, and usefulness at the local level. Other elements only have meaning for larger scale analysis and are not appropriate for smaller geographically-defined projects conducted by local agencies. We question data that loses its quality when aggregated, lacks utility at the local level, and is unclear in its intent and purpose. For example:

- Module 4, Section A: Characteristics for NEW Individuals and Households - Data Entry Form is an unnecessary document that will not produce quality data given lack of consistent definitions; it will have little utility at a local level as agencies use a myriad of tools to assess needs in their community and among their current customer base; it lacks utility at the state level given population centers in states; and it lacks clarity as to its purpose and real value at all levels. It should be removed.
- Several of the Community Level elements to be collected as described are not available in smaller geographic areas usually targeted by local agencies in their community work; and if created by local agencies, they lose validity. The social or population level indicators being requested are not meant for single agency reporting and are best served for community-wide scorecards or utilized as part of a community needs assessment. For example, comparing overall percentages of community indicators (e.g. the unemployment rate, violent crime rate) to individual local agencies outcomes is misleading. These data will be of poor quality when looking at local initiatives, have little to no utility to the state and feds as they cannot be aggregated when local agencies have the ability to define community, and lack clarity as to the real impact of the community change efforts when any comparisons are attempted.
- Module 3, Section A: Many of the indicators used here are inappropriate for reporting by local sub-grantees to States and by States to OCS and will produce data of limited utility. Several challenges underscore this point. First, community-level data on indicators is not always available at the level (e.g. regional or zip code/census tract) or population (e.g. low-income children aged 0-5) that matches the area and population targeted by the agency. Second, community-level indicators are influenced by a wide number of sources that would most likely overwhelm the impact of even successful community initiatives, a fact that significantly limits their utility for providing meaningful information about outcomes. Third, any meaningful data about the outcomes of community-level initiatives would require a rigorous program evaluation and could not be determined on the data collected through the Annual Report alone.
- Stability Indicators Module 4, Section C. Neither option will provide data that has the quality, utility and clarity needed. The first option is a duplicative effort to collect data, and does not provide meaningful information to answer the question of stability. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau's Financial Well-Being Scale relies

on assumptions and definitions about what constitutes “well-being” drawn from the general population, and will not provide clarity to the stability of families with low income.

Question 4: Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

As noted above, OCS’ Dear Colleague Letter of June 17, 2016, states, “Aware of the reporting burden the proposed Annual Report will entail, OCS will decrease that burden by establishing an on-line automated system for use by the states and – at the discretion of the states – the local agencies, for reporting that allows in many instances auto-populating data from one year to the next and a variety of data entry processes (e.g. manual entry and automatic upload).” It is important to note, this online automated system may benefit State Lead Agencies (grantees), but will most likely not benefit local Community Action Agencies (sub-grantees). Sub-grantees (local agencies) will still need systems that track customers, services, outcomes, and given the requirement of many funding sources (including other federal Department of Health and Human Services funding) requires additional and sometime separate data collection systems. State grantees as well do not have the funding or capacity for the most part, to create systems that will streamline or decrease the burden outlined here. Furthermore, new state-level systems will do little to address the needs of local agencies for improved management information systems with the capacity to collect and report the data required by ROMA Next Generation.

OCS and the federal government provide funding to local sub-grantees that require separate systems and prohibit the aggregation of data. To minimize the burden on respondents, DHHS should examine its own practices to ensure that all DHHS-funded programs in the field can use data collection systems that can be easily integrated and “talk” to one another to produce reports that meet the needs of local agencies, states, and OCS.

Comments and Recommendations on the Annual Report Modules

The Partnership has focused its comments in areas with the most significant concerns. The reader should not assume that a lack of comments in a particular area reflects full agreement.

Module 1 - State Administration: (pages 2-22)

Module 1, Section A: (page # 3-4)

- No Comments at this time.

Module 1, Section B: (page # 5-6)

- *B7. Summary Analysis.* As written, this question exceeds the capacity of many state CSBG Lead Agencies (grantees). This question will require information be collected that goes beyond what is being collected through the ROMA data included in this draft annual report. The estimated time burden in the federal register did not assume this additional data collection. This is added reporting burden on State CSBG Lead Agencies because as written, the questions require the agencies to go beyond merely reporting the data and conduct sophisticated data analysis that will require additional time and may exceed the capacity of agency staff to provide meaningful information.
 - **Recommendation:** Either remove the question entirely or change the instructions before the bulleted examples.

- Module 1, Section C: (page # 7)
 - No comments at this time.

Module 1, Section D: (page # 8-9)

- *D2. Organizational Standards Performance.* This question is too narrow in its potential responses and decreases the capacity of the state fulfill its duties and impacts both the quality of the data collected and the utility of the data. The single metric sought is the number of entities that met all state-adopted organizational standards; this is a poor metric when used in isolation of performance at a variety of levels. No one and no agency will score 100% of anything 100% of the time. Ongoing perfection is an unreasonable expectation and is inappropriate to be used as the single reporting measure.
 - **Recommendation:** This question should be changed to allow states to report on how many entities met 100%, 90%, 80%, 70%, 60% and less than 50% of the Standards. This will increase the performance of states by allowing them to focus their limited training and technical assistance resources on those entities not meeting multiple standards. It would also improve the quality of data as it will provide a more robust assessment of performance.
- *D3. Technical Assistance Plans and Quality Improvement Plans.* The current language conveys that a Quality Improvement Plan (QIP) is the preferred option if an eligible entity has one or more unmet organizational standards. OCS IM 138 clearly articulates the Technical Assistance Plan (TAP) is the preferred option.
 - **Recommendation:** (1) Change the wording of the question to clarify that a TAP is the preferred option for an eligible entity with one or more unmet standards; and (2) Add a clarifying reference IM 138's statement that as long as an eligible entity is making progress towards meeting the standards, the state should not take action to reduce or eliminate funding.

Module 1, Section E: (page # 10-14)

- No comments at this time.

Module 1, Section F: (page # 15-16)

- No comments at this time.

Module 1, Section G: (page # 17-19)

- *G3b. Eligible Entity Linkages and Coordination.* This question would not be able to be answered with the ROMA data being collected as proposed. This will increase the burden on states to report.
 - **Recommendation:** Remove or modify question G3b.

Module 1, Section H: (page # 20-21)

- No comments at this time.

Module 1, Section I: (page # 22)

- *14 State Feedback on Data Collection, Analysis, and Reporting.* This question seeks information regarding written feedback regarding the entity’s performance in meeting the ROMA Goals. As the ROMA Goals are not listed in one module, it noted here the Partnership recommends the reinstatement of current ROMA Goal 5: Agencies increase their capacity to achieve results. It is unfortunate there is not a module or section number that requests feedback on proposed new national ROMA goals. Feedback on the three proposed goals would have been better presented as a separate question to demonstrate transparency of the change and to promote feedback and comment, not presented only within other documents. In addition to adding back the aforementioned Agency Goal, the Partnership recommends the OCS seek approval for the new ROMA goals in its final clearance package to OMB later this fall.
 - **Recommendation:**
 - Reinstatement of the ROMA Goal: Agencies increase their capacity to achieve results.
 - Include all recommended ROMA Goals as a separate section in the final OMB Clearance package to allow for full transparency of this change and allow for more reflective and informed comments from the CSBG Network.

Module 2 – Agency Expenditures, Capacity, and Resources: (pages 23-27)

Module 2, Section A: (page # 24)

- No Comments at this time.

Module 2, Section B: (page # 25)

- No Comments at this time.

Module 2, Section C: (page # 26-27)

- No Comments at this time.

Module 3 – Community Level: (pages 28-50)

Module 3, Section A: Community Level Initiatives Home Page: (page # 29)

- The data to be reported on collective impact is unnecessary for the performance of the agency. It will have no utility at the state and national levels as described currently. Collective Impact is a current “term of art” that refers to a specific set of strategies for engaging in community-level work and it makes little sense to privilege this approach over all other options. Also, requiring agencies to distinguish between collective impact and the other options will be confusing, especially since some may be unfamiliar with the concept.
 - **Recommendation:** Remove all Collective Impact options from the reporting tool and transition Collective Impact to training and technical assistance efforts.
- Reporting changes in rates of social or population indicators is inappropriate, unnecessary for proper performance of the state and federal agencies, and will not provide clarity to the impact of community-level initiatives and strategies implemented by eligible entities and their partners. These elements are commonly (and appropriately) used in community scorecards and community needs assessments, not as an outcome indicator for an agency to a state CSBG office. Community-

level outcomes are influenced by a wide range of factors and even successful agency initiatives may show little impact when data is rolled up to a level where social indicators are calculated, meaning the data is of limited utility and potentially misinterpreted in negative ways. Accurate determination of the outcomes of many types of community-level initiatives requires rigorous evaluation and cannot be assessed by reporting community-level indicators alone.

- **Recommendation:** Remove all rates and percentages. Alternatively, a more appropriate system would allow a local agency to report (1) the overall domain of the community initiatives (e.g. health, workforce, etc.); (2) the types of strategies employed (e.g. campaign to increase the minimum wage, EITC, etc.); (3) the target population (e.g. all at-risk high school students in a three county area); and (4) Outputs or Counts (this would allow for agencies to get credit for activities that move the initiative forward but had not yet resulted in outcomes). We are supportive of finding ways to talk about the community level work done by Community Action. Reporting a percentages based off a baseline number is not appropriate, nor is reporting changes in rates when looking at a local agency reporting to the State CSBG Office.

Module 3, Section A: Community Level Initiative Status Page: (page # 30-31)

- **Recommendation:**
 - Remove Collective Impact and transition to training and technical assistance. See above.
 - See additional comments later regarding Outcome Indicators

Module 3, Section A: Supplemental Data: (page # 32)

- **Recommendation:**
 - Remove Collective Impact

Module 3, Section A: Strategies Popup Windows: (page # 33-36)

- No Comments at this time.

Module 3, Section B: Community Level NPIs: (page # 37)

- No Comments at this time.

Module 3, Section B: Community Level NPI Landing Page: (page # 37-39)

- Remove percentages. Using percent as a measure for community indicators is confusing and negatively impacts the quality, utility and clarity of the data and will lead to data misuse and misinterpretation. Including the “percent” has several problems. First, even though agencies are allowed to define what constitutes “community”, it may be difficult for agencies to collect this data if it does not correspond to a unit or level of analysis for which there is readily available data (e.g. if community is defined as several census tracts for which the specific data in question is not available). Second, because the definition of what constitutes the community is left up to the agency, agencies may struggle to define it exactly (e.g. in the case of a broad public awareness campaign) which is unduly burdensome and may result in the collection of data with limited utility. Third, it may unfairly force a comparison between the agency’s outcome and the overall rate of a particular community level indicator. For example, a county-wide workforce development initiative

may successfully create 100 jobs, but may look like (misleadingly) like a minimal result when compared with the overall county unemployment rate.

- **Recommendation:** Remove “and percent” from ALL community level indicators.
- Rates and social indicators are not appropriate for a reporting instrument from a local agency to the state office. These elements are commonly and more appropriately used in community score cards or collected as part of a needs assessment. As with percentages, rates are problematic. First, even though agencies are allowed to define what constitutes “community”, it may be difficult for agencies to collect “rates” for comparison data for the sub-set area the local agency and its partners are focus upon with their efforts. Such data has validity for geographic areas much larger in than those addressed or targeted by local agency projects. This validity is lost when the scale is smaller and accepted data comparison points become unavailable. Having individual agencies report on rate change at the community level on social indicators does not provide information that is usable. It is more appropriate to give agencies the option of reporting outcome data and the flexibility to define which indicators they use. If data is not available that corresponds to the area selected, data becomes unreliable and misleading.
 - **Recommendation:** Remove all indicators that address “Rates”, including but not limited to:
 - Education and Cognitive Development: 5, 6, 7, 10
 - Housing: 6, 7, 8
 - Health and Social/Behavioral (2a, 2b, 2c, 2d, 2e, 3a, 3c,)
 - Public Safety (4a, 4c)

Module 3, Section B: Community Level NPI Data Entry Forms: (page # 40-50)

- This instruction is misleading and is inappropriate. It will negatively impact the capacity of the agency to perform its functions properly. Local CAAs have the ability to determine the strategies they implement in a community and to have the reporting tool state, “agencies must provide a narrative justifying...” is inappropriate.
 - **Recommendation:** Remove/modify this sentence to remove the word *justify*, “When reporting a baseline number (Column II), agencies will have the option to provide a baseline number when the information is available, feasible, and reasonable to collect and track. In situations where the baseline is not available, agencies must provide a narrative justifying the need for the initiative...”

Module 4 – Individual and Family Level: (pages 51-75)

- No Comments at this time.

Module 4, Section A: Characteristics for NEW Individuals and Households Report: (page # 52)

- *The Characteristics for NEW Individuals and Households is not necessary for the proper performance of the functions of the agency; and when aggregated to the state level, the information has no practical utility.* This report is not necessary for agency performance and the intentions outlined by OCS for its use are not reflective of how local agencies and states look at their communities to assess needs, develop programs, and report progress. Demographic data alone does not identify the needs the new customers may have and is therefore of limited utility in comparison to data about individual, family, and community needs. Second, since several core CAA programs (e.g. LIHEAP) have a large number of new customers with limited or one time contact with the agency,

demographic data collected from the “low touch” services would confuse meaningful analysis of demographic trends. Third, many CAAs have to rely on data collected by their partners and grantees (in the case of public agencies), many of whom may have limited capacity to collect demographic data for new individuals and households. Fourth, there are many practical problems to identifying who constitutes a new customer or household which also constitutes an additional data collection burden on staff. Finally, data system challenges to collect and report this sub-set of data are significant and the cost to address these challenges outweighs any potential benefit of this data.

- **Recommendation:** Remove the Characteristics for NEW Individuals and Households Report in its entirety.

Module 4, Section B: All Characteristics Report: (page # 53-54)

- No Comments at this time.

Module 4, Section C: Individual and Family NPIs: (page # 55)

- No Comments at this time.

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

- *Local entities are not provided funding to track all individuals and families receiving services over the 180 day period of time requested by this indicator, leading to an inability to report the data.* Additionally, many customers of local agencies seek and receive one-time services when experiencing challenges and have no interest in maintaining contact with the local agency, making follow-up challenging and invasive. Finally, many local agencies lack data collection systems that track time-related data, making collection of this information burdensome.
 - **Recommendation:**
 - Remove the indicator for 180 days from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development *except* in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required.
 - Revise the language in the introduction to these forms that state the “Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this same time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator.”
- The options available to report on the Stability Indicators do not provide data to answer the question on the data collection form on page 67, “The following outcome indicators answer the following commonly asked question: How many people (or families) are 'better off/lives improved' because of CAAs work?” The first option is duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau’s Financial Well-Being Scale relies on assumptions and definitions about what constitutes “well-being” drawn from the general population. This will result in the collection of data of limited utility for two reasons. First, compared to what constitutes financial

well-being as defined by working and middle class Americans, the large majority of agency customers will be at the lowest end of the scale, meaning there will be little variance in the data to allow for meaningful comparison. Second, what constitutes successful outcomes for most agency customers would only result in slight changes on the scale. For example, doubling savings from \$50 to \$100 a month would represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. In short, the scale is an inappropriate measure and will not result in the collection of useful data.

- **Recommendation:** Remove the Stability Indicators in their entirety. Neither of the options presented provide information needed to report on stability as a result of local agencies' efforts.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

- The following statement included in this section is problematic as written: *Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking).* This sweeping statement leads the reader to believe the future expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies.
 - **Recommendation:** The statement should be edited to clearly state that tracking outcomes for 180 days is limited solely to Workforce Investment and Opportunity Act (WIOA) activity.

Module 4, Section D: Individual and Family Services: (page # 68-75)

- No Comments at this time.

Thank you for your consideration of our comments. We are happy to meet with OCS and OMB to discuss any of the content included in this feedback and appreciate the efforts underway to incorporate feedback received. Please contact me at dharlow@communityactionpartnership.com or 202-595-0660.

We look forward to working with OCS on to ensure the final package provided to OMB for clearance is the best product for the Community Action Network.

Sincerely,

Denise L Harlow

Denise L Harlow, CCAP
Chief Executive Officer