Association of Nationally Certified ROMA Trainers

To: ACF Reports Clearance Officer, Robert Sargis.

From: John Edwards, President

Re: information collection, Community Services Block Grant (CSBG) Annual Report,

Date: August 15, 2016

I am writing as an officer in the Association of Nationally Certified Results Oriented Management and Accountability (ROMA) Trainers and my comments reflect what I have heard from peers across the country.

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.

 Yes – this report "closes the loop" related to several OCS initiatives: the Model State Plan, State and Federal Accountability Measures and Organizational Standards and modernizes the Information Survey currently in use for reporting on agency capacity, use of resources, demographics of individuals and families served, and achievement of outcomes. As such the practical utility is to have a vehicle for reporting on key elements of an extensive performance management system for all levels of the CSBG network.

While we hear that the reporting of services and strategies will create a burden for some agencies, we applaud the separation of services from outcomes, which has caused confusion in the past. It is important for agencies to be able to identify what they do as well as what happens as a result of their work. This report will allow that and will have practical application.

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

- One area currently proposed could be modified to increase utility

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 -- such as the number of local agencies that have met 80 – 99%, 60 to 79% or less than 60% (or similar ranges). The single standard of 100% does not show strength or allow for demonstration of progress.

- Some areas may need to be modified to respond to the barriers facing many local agencies to increase clarity regarding the information to be collected.

Agency Expenditures, Capacity, and Resources Module:
We support the expanded agency capacity items in this module, including the use of CSBG funding for this purpose and a way to identify the capacity activities that are supported in this

way. This module section is the place where we see the importance of and the support for building and maintaining Agency Capacity that is needed as the foundation of all of the network's outcomes. We like the additional elements of staff credentialing, but want to see the family worker credentialing returned to the list (is in current IS reporting) as this is an area where we need to see skills and attitude development for our direct service workers.

We question is the placement of administrative expenditures in Module 2 Section A. We have heard from our fiscal colleagues that CSBG administrative expenditures should not be included in the other domain areas of report and then taken out to be reported separately. It has been stated that either an expenditure is related to a service domain or it is administration in nature (according to OCS IM 37). This was the proposal in the discussions over the past two years, but in the report as it is presented for comment administration dollars are first included and then separated -- which is how this has been reported in the IS. This requires additional clarity.

Family Level Module:
One area needing clarity is the proposed two demographic reports. While we support agencies reporting on an unduplicated count of all individuals and families served by local agencies, we are not completely convinced that the use of "new" characteristics report will be worth the burden to disaggregate these individuals from the whole data base of demographics. More clarity related to how the two different reports would be used is needed.

A second area is the so called "stability indicators" which do not capture much of the work that agencies do to help families become stable (moving from in-crisis or vulnerable status). We support the use of stability indicators, but feel they must more accurately describe this first step on the continuum to self sufficiency or economic stability. We recommend language that would demonstrate the number and percent of individuals and families who avoided or reduced a crisis.

Community Level Module:
The community indicators asking for baseline numbers and percent of change are unclear. For example, if an agency helps to create a community center in a community where there is no such facility, the baseline would be zero and the percent would be calculated by dividing 1 by 0 – which is not a real number. Or if an agency helps to bring 30 new jobs to a community where there are 3000 jobs but the unemployment rate is 20% (thus indicating that there is a need for MANY more jobs) what will the calculation of a percent demonstrate? We propose using a narrative for identifying need and then, as the community project progresses, indicate what measurement will be used to identify success (1 community center, 30 jobs, etc.) We should remove the "and percent" in the indicators.

We support the use of three types of community work: independent, partnership, collective impact. This is a way to clarify the kind of efforts of the network.

We feel the use of "other indicators" will be very useful to secure more report data from the field. Could there also be "other indicators" in the family level module?