CSBG Annual Report/ROMA Next Generation
30-Day Comment Period
Partnership Perspective and Discussion

Denise Harlow, MSW, CCAP, NCRT
Chief Executive Officer
Community Action Partnership
dharlow@communityactionpartnership.com

Jarle Crocker, PhD, NCRT
Director T/TA
Community Action Partnership
jcrocker@communityactionpartnership.com
ROMA Next Generation’s Balancing Act

Local Resources and Capacities

Need for a Robust System
Key Information

- OMB 30 day comment period: November 1, 2016 – November 30, 2016
- Comments go to: OIRA_SUBMISSION@OMB.EOP.GOV
- For deep dive information go to: www.nascsp.org
FINAL OMB COMMENT PERIOD

• A Federal Register Notice (FRN#2) was published on November 1, 2016.

• It allows for a 30-day public comment period.

• Public comments are submitted directly to OMB.

• OMB will review the submitted comments and either approve or request additional changes to the Annual Report.

• Any approval will be for a three-year period.

• OCS is creating ongoing infrastructure for future clearances.
OMB CLEARANCE OF CSBG ANNUAL REPORT

• **COMPLETED: 60-Day Initial Comment Period:** March 3, 2016 – April 13, 2016
• **COMPLETED: Formal 60-Day Comment Period (FRN#1):** June 16, 2016-August 15, 2016
• **Final Comment Period (FRN#2) - 30-Days:** November 1, 2016 – November 30, 2016
IMPLEMENTATION

The CSBG Annual Report will be implemented in two phases:

– **Phase 1:** States complete only Module 1 in the Online Data Collection (OLDC) System for FY16 and FY17. The expected submission date for FY16 is **March 31, 2017**.

– **Phase 2:** States will report on Modules 1 – 4 for the FY18 CSBG Annual Report in OLDC. The expected submission date is **March 31, 2019**.
The Critical Connections

Community Assessment
Strategic Planning
Community Action Plan

CSBG State Plan
CSBG Annual Report
CSBG Congressional Report

The Results Oriented Management and Accountability Cycle

Assessment
Community needs and resources, agency data

Evaluation
Analyze data, compare with benchmarks

Planning
Use agency mission statement and assessment data to identify results and strategies

Achievement of Results
Observe and report progress

Implementation
Services and strategies produce results
Partnership’s Perspective

- Substantive revisions have been made moving the process in a positive direction
- Some lingering concerns
- Instructional clarity still needed
- Training and Technical Assistance will be needed for CAAs and State CSBG Offices
Positive Moves Continued

• Removal of the *New Customer Characteristics Report*
• Addition of *counts* for the community level indicators
• Better estimate of the *burden*
• *Expansion of metrics* around CSBG Organizational Standards
• *Removal* of “Collective Impact” language
• Characteristics report provides *additional* options
Today’s Conversation

• The following slides note each large area of concern included the Partnership’s comments submitted at the end of the 60 Day comment window

• Slides include original concern, how it was addressed, and current thoughts
### Module 1, Question D2

<table>
<thead>
<tr>
<th>Concern</th>
<th>How Addressed</th>
<th>Thoughts</th>
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<tbody>
<tr>
<td>A <strong>single metric</strong> for State CSBG Lead Agencies to report on how many CAAs met 100% of the CSBG Organizational Standards is too narrow to capture the work towards these Standards and represents a misuse of the CSBG Organizational Standards intent.</td>
<td>Provided D2a and D2b. Allows states to report number of CAAs 90-99%, 80-89%, &amp; 70-79% of CSBG Organizational Standards. In addition allows states to report number of agencies meeting 100% of the Standards in each of the 9 categories (governance, financial management, strategic planning, etc.)</td>
<td>D2a gives much more flexibility and shows progress towards the high goal of compliance with all CSBG Organizational Standards. D2b still focuses on 100% compliance and the math gets even more challenging when working with categories of standards. In addition, states with few CAAs would also experience data that is not useful or truly reflective of performance. While this information may be helpful from a T/TA perspective, Partnership sees it problematic here.</td>
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## Module 1, Question D3

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<tr>
<td>Conveys that QIPs are the preferred option if a CAA has one or more unmet CSBG Organizational Standards. This does not reflect the spirit of the Standards and IM 138 which states that a TAP is the preferred option. More clarity needed on when TAPs and QIPs are appropriate</td>
<td>Changed language to note TAP first, added a reference to IM 138 which gives additional information on TAPs and QIPs</td>
<td>Positive add of reference to IM 138; however, could benefit from additional embedded language in the report itself on when it’s appropriate to use a TAP vs. QIP.</td>
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<tr>
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<td>Thoughts</td>
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<tr>
<td>Summary analysis of ROMA data by State grantees is beyond State capacity and would require additional data collection. Represents an added burden of data collection for both CAAs and State CSBG Lead Agencies</td>
<td>Question B7 was removed; however, questions in Section I under ROMA System were modified</td>
<td>Concerned that I5 “Provide 2-3 examples of changes made by CEEs to improve service delivery and enhance impact … based on their in-depth analysis of performance data” will lead to additional data collection. The State would already know that the CAAs underwent this process by assessing CSBG Organizational Standard 9.3, but may have to collect additional data to get narrative examples. Utility and purpose?</td>
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Also Note I4: State Feedback on Data Collection, Analysis, and Reporting

1.4 State Feedback on Data Collection, Analysis, and Reporting: State Accountability Measure 5S(ii) requires states to submit written feedback to each CSBG Eligible Entity regarding the entity’s performance in meeting ROMA goals, as measured through National Performance Indicator (NPI) data, within 60 calendar days of submitting the State’s Annual Report. Has the state provided each CSBG Eligible Entity written, timely (at a minimum within 60 days of the submission) feedback regarding the entity’s performance in meeting ROMA goals as measured through national performance data? □ Yes □ No

October 2016
FRN #2 – CSBG Annual Report
Module 1, State Administration

If no, describe the plan to assure timely notification of the CSBG Eligible Entities within 60 calendar days of submitting the State’s CSBG Annual Report. [Narrative 2500 characters]

If yes, please describe.

Note: This information is associated with State Accountability Measure 5S(ii).
# Module 3, Sections A & B

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<tr>
<td>Use of percent or rates for Community/Social indicators is inappropriate given the myriad of factors affecting community level indicators.</td>
<td>Provides <strong>Counts of Change</strong> and Rates of Change as options in the Community NPIs</td>
<td>Providing the counts option represents a good compromise, would still caution the use of rates. Better definitions of community, community-level work, and methodology is needed. Can be done through guidance and T/TA, though would like to see more clarity in the instructions.</td>
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## Module 3, “Collective Impact”

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<tbody>
<tr>
<td>“Collective Impact” is only one model of community-level work and should not be called out as a favored approach. This sort of data has little utility when rolled up</td>
<td>Collective Impact was removed from the Community Initiative Status Page and the overall Section A was streamlined</td>
<td>Positive change. T/TA on Collective Impact and other approaches to community-level work needed</td>
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## Module 4, Section A

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<tr>
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<th>How Addressed</th>
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<tr>
<td>The “Characteristics for NEW Individuals and Households Report” is not necessary; difficult to define “new” across the CSBG Network; challenging to make meaning when rolled up to state or federal levels; and places an immense burden on data systems that do not currently allow for this information to be produced</td>
<td>The Characteristics for New Individuals and Households Report was removed</td>
<td>Positive change with a significant impact, reducing the burden of data collection overall</td>
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### Module 4, Section C “90/180 days”

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<tr>
<td>Language around 180 day follow-up states that it is an expectation for all CAAs to work towards which is not feasible given staff capacity, funding, access to customers for follow up, or technology systems to track said data</td>
<td>Instructions modified to “CEEs are only expected to report on indicators with retention time frames for programs that specifically include follow up. If the CEE does not conduct follow up activities as a part of their programs, outcomes for indicators with retention time frames will not be reported.”</td>
<td>Positive change and clarification</td>
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## Module 4, Section C “stability”

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<tr>
<td>Neither of the options provided is appropriate (# of individuals who achieve one or more outcomes as identified by the NPIs in various domains; # of individuals who report improved financial well-being based on CFPB Financial Well Being Scale)</td>
<td>“Stability” as a domain was replaced with “Outcomes Achieved Across Multiple Domains” reflecting the first option, the CFPB Financial Well-Being Score was moved to Q8 under “Income and Asset Building”</td>
<td>The CFPB Financial Well Being Scale is still not an appropriate measure for financial well-being given its development for the population at large and not specific to low-income populations. Lingering concern about the “Outcomes Across Multiple Domains” and whether data systems are currently able to produce this data consistently to allow the roll up data to be relevant.</td>
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# General Concern – Agency Goal

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<tr>
<td>The removal of an agency level goal restricts the reporting on improvements to management, operations, and infrastructure that directly impact the ability for agencies to produce successful outcomes and gives less performance data to assess T/TA needs</td>
<td>An agency level goal was NOT reinstated</td>
<td>Disappointed, but will not be including a call for the goal in letter to OMB.</td>
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## General Concern – Public CAAs

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<tbody>
<tr>
<td>Public CAAs that sub-contract all or most of their CSBG funding to other providers may face added challenges in requiring sub-grantees to collect data in accordance with this proposal</td>
<td>No added language mentioned for Public CAAs</td>
<td>~20% of our Network are public entities that may be limited in their contracting with other service providers that already have the capacity to provide the requisite data collection and/or require more T/TA to meet these new program requirements. These unique challenges and burden is not addressed in the proposed package.</td>
</tr>
</tbody>
</table>
CLIENT REPORTING

• Agencies may have multiple data systems that do not have a process for sharing data, creating a barrier to providing an unduplicated number of individuals and households served across programs. We’ve provided the following new questions to address this issue:

**E. Number of Individuals Not Included in the Totals Above**  (due to data collection system integration barriers)

1. Please list the unduplicated number of INDIVIDUALS served in each program*:

<table>
<thead>
<tr>
<th>Program Name</th>
<th>Number of Individuals</th>
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<td></td>
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</tbody>
</table>

**F. Number of Households Not Included in the Totals Above**  (due to data collection system integration barriers)

1. Please list the unduplicated number of HOUSEHOLDS served in each program*:

<table>
<thead>
<tr>
<th>Program Name</th>
<th>Number of Households</th>
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</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</tbody>
</table>

*The system will add rows to allow reporting on multiple programs.*
NATIONAL GOALS

1. Individuals and families with low incomes are stable and achieve economic security.
2. Communities where people with low incomes live are healthy and offer economic opportunity.
3. People with low incomes are engaged and active in building opportunities in their communities.
BURDEN ESTIMATE

• Burden ranges and estimates are averaged over a three year period for every module and include the estimated hours projected to be spent on:
  1) Data entry and review;
  2) Data collection; and
  3) Training and Technical Assistance

• Varying levels of capacity throughout the 1,035 local agencies.
Estimated Annualized Burden Hours

<table>
<thead>
<tr>
<th>Instrument</th>
<th>Number of respondents</th>
<th>Number of responses per respondent</th>
<th>AVERAGE RANGE of annualized burden hours per response*</th>
<th>AVERAGE annualized burden hours per response</th>
<th>AVERAGE annualized national burden Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>CSBG Annual Report</td>
<td>52 Grantees</td>
<td>1</td>
<td>144-252</td>
<td>203</td>
<td>10,566</td>
</tr>
<tr>
<td></td>
<td>1,035 Sub-Grantees</td>
<td>1</td>
<td>508-885</td>
<td>756</td>
<td>782,460</td>
</tr>
</tbody>
</table>

Estimated Average Range of Annualized Burden Hours by Module

<table>
<thead>
<tr>
<th>CSBG Annual Report</th>
<th>Grantee average range of annualized hours by Module</th>
<th>Sub-grantee average range of annualized hours by Module</th>
</tr>
</thead>
<tbody>
<tr>
<td>Module 1</td>
<td>38-70 hours</td>
<td>10-20 hours</td>
</tr>
<tr>
<td>Module 2</td>
<td>24-39 hours</td>
<td>115-187 hours</td>
</tr>
<tr>
<td>Module 3</td>
<td>30-57 hours</td>
<td>115-240 hours</td>
</tr>
<tr>
<td>Module 4</td>
<td>52-86 hours</td>
<td>268-438 hours</td>
</tr>
<tr>
<td>*AVERAGE RANGE</td>
<td>144-252 hours</td>
<td>508-885 hours</td>
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Resources

Recorded Webinars

November 10, 2016 - Module Guides
Check out the brief webinar recordings (approximately 30 minutes) for each module of the CSBG Annual Report. The recordings will guide you through the CSBG Annual Report as you put together your feedback for the 30-day comment period.

Module 1: State Administration  Recording | Slides
Module 2: CSBG Eligible Entity Expenditures, Capacity, and Resources  Recording | Slides
Module 3: Community Level  Recording | Slides
Module 4: Individual and Family Level  Recording | Slides

November 1, 2016 - "Updated CSBG Annual Report":  Recording | Slides

Tools

CSBG Annual Report/CSBG IS Survey Crosswalk - Use this quick reference tool to identify how the CSBG Annual Report and CSBG IS Survey overlap!

Annotated CSBG Annual Report - This detailed document provides line by line notations on which CSBG IS NPIs and Sections are included, expanded upon, or used to inform the CSBG Annual Report.
Questions

???
We Want To Hear From You!

• Let us know what positive changes were made and what challenges remain from your perspective
• Send questions, comments, concerns to Denise and/or Jarle no later than
  – Dharlow@communityactionpartnership.com
  – Jcrocker@communityactionpartnership.com
• Comments to OIRA_SUBMISSION@OMB.EOP.GOV, Attn: Desk Officer for the Administration for Children and Families by 11/30
Register Today!

www.communityactionpartnership.com
Assistant Secretary for Planning and Evaluation (ASPE) releases brief of the work of Rural IMPACT

This report summarizes findings from an ASPE study of the first year of the White House Rural Council/HHS Rural IMPACT demonstration, which aims to reduce poverty through coordinated services for both children and parents. ASPE did a summary scan of all 10 demonstration sites and more in-depth study of six of those sites (including visits to two). Key findings include: greater tailoring of technical assistance to individual site circumstances may increase its effectiveness; additional site resources could better support Rural IMPACT; a range of partners must be involved, particularly families themselves; leadership is critical; the federal role in Rural IMPACT facilitated planning and implementation, with limitations; and sites are eager to encourage twogeneration efforts more widely.

Click here to download the brief