community Action
Helping People. Changing Lives.
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October 2, 2020

Office of the Assistant Secretary for Planning and Evaluation
U.S. Department of Health and Human Services
200 Independence Avenue SW, Room 415F
Washington, DC 20201

Re: Request for Information on Federal Coordination to Promote
Economic Mobility for All Americans [FR Doc. 2020–15319 Filed 7–
15–20; 8:45 am]

Assistant Secretary for Planning and Evaluation:

I am writing on behalf of the Community Action Partnership
(Partnership) and the undersigned organizations in response to the U.S.
Department of Health and Human Services' Request for Information
(RFI) published in the Federal Register on July 16, 2020 (FR Doc. 2020–
15319) entitled, "Request for Information on Federal Coordination To
Promote Economic Mobility for All Americans."[1] The U.S. Department
of Health and Human Services (HHS) has requested that stakeholders
consider 15 key questions that will assist its development of an
interagency Council on Economic Mobility (Council).

The Partnership is the national membership association and hub
that links the nation's more than 1,000 Community Action Agencies
(CAA).[2] Its mission is to "ensure that the causes and conditions of
poverty are effectively addressed and to strengthen, promote, represent
and serve its Network of member Agencies."[3] CAAs cover 99% of
counties in 50 states, the District of Columbia, and Puerto Rico, and
touch the lives of 15 million individuals with low-incomes, including 6.2
million families, and 3.9 million children.[4] Community Action's role in
addressing multiple factors that contribute to economic mobility gives us
a unique perspective on how federal agencies can collaborate to
accelerate economic mobility for all Americans. Please find below the
Partnership's responses to the key questions posed in the RFI.

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[1] Request for Information on Federal Coordination To Promote Economic Mobility for All Americans, 85 Fed.
Reg. 43242 (Jul. 16, 2020).
[2] *ABOUT US*, COMMUNITY ACTION PARTNERSHIP, https://communityactionpartnership.com/about-us/ (last visited
Sept. 16, 2019).
[3] *MISSION & PROMISE*, COMMUNITY ACTION PARTNERSHIP, https://communityactionpartnership.com/mission-and-promise/ (last visited Sept. 16, 2019).
[4] NATIONAL IMPACT REPORT, COMMUNITY ACTION PARTNERSHIP 5 (2019), available at
https://communityactionpartnership.com/wp-content/uploads/2019/02/CAP-Report-2.26.19-revised_MOBILE.pdf.

3.1. What priorities would you identify for the new federal Council on Economic Mobility?

The Partnership has identified five priorities that we believe should be the pillars of the Council's work:

A. Place and Community Conditions Matter—Support Policies and Strategies That Strengthen Local Communities and Economies That Help Families Thrive;

B. Disparities by Race, Gender, and Immigration Status Persist—Commit to Jointly Addressing Structural Barriers to Mobility from Poverty;

C. Stability and Income Matter—Support Policies and Programs that Lessen Economic and Psychological Burdens on Families with Children (Especially Young Children);

D. Access to Services is Fundamental—Address Outdated and Uncoordinated Eligibility Processes, and Data Use to Support Equitable, Efficient, and Effective Results; and

E. Economic Mobility, Health, and Well-Being Are Linked—Integrate Medical Care and Social Services to Improve Health Outcomes and Economic Mobility.

A. Place and Community Conditions Matter – Support Policies and Strategies That Strengthen Local Communities and Economies That Help Families Thrive

Too frequently, struggling Americans live in areas of concentrated poverty, communities with poor schools, or places where the local economy provides little access to good jobs. Drivers of economic mobility are rooted in interconnected economic, social, and health conditions that vary greatly depending on whether one lives in an urban area of concentrated poverty, a widely dispersed rural area, or somewhere in-between. At this point the economic, racial, and climate challenges and barriers facing us are "wicked problems" – complex, unpredictable, open-ended, and/or intractable.[5] Solutions to these wicked problems will be found by increasing shared understanding of the problems and possible solutions.

Prior to the COVID-19 pandemic, the world was undergoing rapid employment growth, low unemployment, and impending disruption in many sectors due to advancing technologies. The COVID-19 pandemic is affecting local economies in every corner of America. It has ended the longest economic expansion in U.S. history and increased unemployment worldwide. At the same time, it has likely accelerated transformations that will impact many sectors such as child care, retail, and hospitality. Many of the sectors that are expected to be disrupted provide jobs for low-wage workers, those with lower levels of education, minorities, women, and young people. The immediate impacts have thrown millions of workers into crisis with incomes either reduced or eliminated entirely.

In the coming months and years, decisive federal leadership will be necessary. After every U.S. recession since 1991, it has taken progressively longer for jobs to reappear. "The

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[5] Brian W. Head and John Alford, *Wicked Problems: Implications for Public Policy and Management*, 47(6) ADMIN. AND SOC'Y 711, 711-739 (2015).

United States did not regain the number of jobs it lost in the Great Recession until 2014."[6] The scale and urgency of the workforce transformation calls for nothing short of a reskilling revolution. An urgent investment in human capital is needed to revive pathways to social mobility and create a fairer world. Preparing for the "future of work" has gone from a distant hypothetical priority to a very immediate one. "Tens of millions of workers need support not only to get through today's challenges but also to put themselves on a better footing for the future."[7]

Through the Council, the immense capacity and resources of the federal agencies could focus together on the following:

- Giving sufficient consideration to the reality that not all communities and local economies have the same or even sufficient resources and positive community conditions needed for individuals to achieve economic mobility. Local progress on "wicked problems" can be accelerated if coherent action can be taken across federal agencies. The Council should provide the space for creating shared understanding across the set of interagency partners and programs that address community conditions. Where flexibilities allow, the Council should encourage the use of funds to improve community conditions that stimulate economic mobility.

- Information-sharing across federal, state, and local levels pertaining to the jobs and skills transformation taking place. Share data and analytics widely to help local partners effectively target resources and jointly problem-solve. Curate best practices and exemplars of upskilling and reskilling programs that close skills gaps.

- Leading a federal initiative that encourages private companies and businesses to do more to reskill their workers and connects them to local reskilling and redeployment ecosystems

B. Disparities by Race, Gender, and Immigration Status Persist – Commit to Jointly Addressing Structural Barriers to Mobility from Poverty

Person-level programs are important, but do very little to address the rules, laws, and power dynamics operating at the government, economic, social and/or cultural levels. If systemic barriers that hinder broader progress are not addressed alongside person-level programs, then lasting and real economic mobility gains will remain elusive. The COVID-19 pandemic and calls to address racial inequality have exposed inequities in health care and public health, the workplace, education, and the criminal justice system.

Discrimination in hiring, employment, housing, education, and health care creates barriers that block economic mobility and results in higher rates of people of color and women experiencing poverty. The Council could focus on the following cross-agency activities to elevate solutions that remove structural barriers to mobility:

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[6] SUSAN LUND, KWEILIN ELINGRUND, BRAYAN HANCOCK & JAMES MANYIKA, COVID-19 AND JOBS: MONITORING THE US IMPACT ON PEOPLE AND PLACES 2, (McKinsey Global Initiative 2020) available at https://www.mckinsey.com/industries/public-and-social-sector/our-insights/covid-19-and-jobs-monitoring-the-us-impact-on-people-and-places#.
[7] *Id*. at 10.

- Identify burdensome administrative procedures that may discourage people – especially the neediest – from accessing programs and services.

- Commit to disaggregating and analyzing data by race, ethnicity, and gender to determine who is using programs and for whom programs are working. Make this information transparent and widely available for everyone to learn from.

C. Stability and Income Matter – Support Policies and Programs that Lessen Economic and Psychological Burdens on Families with Children (Especially Young Children)

Poverty can cause negative child outcomes, especially when it begins in early childhood and continues for a large share of the child's life. Investment in early childhood education has been a priority for strengthening health and learning across the lifespan and is viewed as a key to achieving positive outcomes in adulthood. However, the importance of supporting parents in their efforts to create safe environments and nurturing relationships has been given insufficient attention and investment.

At the federal, state, and local levels, the U.S. invests billions in early childhood education while paying little attention to the material hardship many families experience due to unemployment, low-wage work, and an inadequate safety net. We are squandering our precious early childhood investments when we send children home from a day of high-quality education to an environment where safe, stable housing may not be ensured, and constant economic worries prevent parents from being the best they can be. In a recent study, the National Scientific Council on the Developing Child stated:

> Strategic investments in young children and the adults who care for them affect long-term physical and mental health as much as they affect early learning. When access to essential resources and supportive relationships is secure, the building blocks of both resilience (e.g., self-regulation and adaptive skills) and wellness (e.g., well-regulated stress response systems) are strengthened. When hardships or threats are extreme or persistent, particularly in the context of intergenerational poverty and/or systemic racism, multiple biological systems can be disrupted. The "downstream" results of these disruptions are poor educational achievement, lower economic productivity, higher rates of crime, and increased health care costs.[8]

Poor outcomes are not inevitable but are more likely if we do not adequately support children and families experiencing persistent hardships or challenges. We must consider how key family-supporting resources are used at the federal, state, and local levels and bolster safety net policies and investment choices that address the income, housing, nutrition, medical insurance, and health care access needs of families.

As the COVID-19 pandemic continues, more and more families are experiencing material hardship. The Coronavirus Aid, Relief, and Economic Security (CARES) Act supports helped to

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[8] JACK P. SHONKOFF, M.D. ET AL.,CONNECTING THE BRAIN TO THE REST OF THE BODY: EARLY CHILDHOOD DEVELOPMENT AND LIFELONG HEALTH ARE DEEPLY INTERTWINED 2 (National Scientific Council on the Developing Child 2020), available at https://46y5eh11fhgw3ve3ytpwxt9r-wpengine.netdna-ssl.com/wp-content/uploads/2020/06/wp15_health_FINAL.pdf

blunt some of the impact of income reductions, but many of those supports have now expired while unemployment, work furloughs, and reduced hours continue. The deluge of unemployment claims created significant delays for many people who urgently needed money for rent, food, and utilities. Families headed by freelancers and gig workers found it difficult to navigate application processes that were not developed with their situations in mind. The initial steps taken by Congress to broaden and deepen the U.S. unemployment insurance system and to provide one-time cash payments to more than 130 million taxpayers provided an initial buffer and temporary economic security to families during the crisis. However, material hardship continues for millions of families, and many of the supports put in place have expired.

What happens in one generation affects the next, both positively and negatively. Jobs with family-supporting wages are a critical component of economic security for parents now and economic mobility for their children in the future. Material hardship in a family may create stress that negatively impacts future child outcomes. The Council should consider working across federal agencies to further the following actions:

- Identify and prioritize opportunities for pursuing the National Academies of Sciences, Engineering, and Medicine's 2019 conclusions and recommendations for reducing child poverty.[9]

- Seek out and lift up safety-net policies and investments that help parents reduce material hardship from unstable housing, a lack of food and child care, inadequate medical care, and other basic needs.

- Work across federal agencies to examine rules and policies and identify flexibilities that exist in current programs that could support parents by reducing material hardship and stress, and allow parents more time with young children to build nurturing relationships and protect family cohesion.

- Closely examine how states are using flexibilities in block grant programs. Many of the programs (e.g., Temporary Assistance for Needy Families (TANF), Child Care Development Block Grant (CCDBG), and Social Services Block Grant (SSBG)) that help to reduce material hardship for families are block grants that allow states to interpret and set rules and policies for exactly who can get help, how much they can receive, and for how long. These polices can vary greatly across states. For example, the TANF benefit amount for a single-parent family with two children and no income in the most populous area of the state ranged from $170 in Mississippi to $1,039 in New Hampshire in 2018.[10] Unfortunately, some states have taken advantage of flexibilities designed to accommodate the unique conditions in each state in a manner that has resulted over time in a race to the bottom among states.

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[9] NAT'L ACAD. OF SCI., ENG'G, AND MED., A ROADMAP TO REDUCING CHILD POVERTY 125-211 (National Academies Press 2019), available at https://doi.org/10.17226/25246.

[10] SARAH MINTON AND LINDA GIANNARELLI, GRAPHICAL OVERVIEW OF STATE TANF POLICIES AS OF JULY 2018 7 (Office of Planning, Research, and Evaluation, Admin. for Children & Families, Dep't. of Health and Human Serv., OPRE Report 2020-121 2020), available at
https://www.acf.hhs.gov/sites/default/files/opre/wrd_2018_databook_companion_piece_508.pdf

- Support whole family approaches to improving economic mobility. Many services are directed at benefitting *either* adult or child family members. This disconnected approach can lead to discrete benefits failing to work in concert to benefit whole families. Where possible, these services should be intentionally integrated so that parents and children mutually benefit from each other's advances. Families and communities grow stronger by building economic assets, social capital, and educational achievements together.

D. Access to Services and Supports Must be Improved – **Address Outdated and Uncoordinated Eligibility, Processes, and Data Use to Support Equitable, Efficient, and Effective Results**

To access programs and services they need, families must navigate a maze of eligibility and application procedures that too often depend on processes and technology in serious need of modernization. Services are often delivered in ways that can stigmatize, isolate, and dehumanize. In some cases, applying for assistance may mean missing work or taking children on long bus rides, which can be costly and burdensome. Eligibility and recertification processes are often duplicative and waste precious resources for families and community-based organizations. Accountability for federal resources is important, but the system is full of challenges and barriers that are inefficient and do not recognize people's humanity.

At the core of our efforts to determine eligibility are flaws in the use of the Federal Poverty Guidelines (FPG) to qualify individuals for services and the use of certain thresholds to estimate a population's income and poverty levels. Federal poverty thresholds are set at artificially depressed rates. In 2020, a family of three is below the FPG if their annual household income is less than $21,720. While some programs use a percentage multiple of the guidelines, such as 125, 150, or 185 percent, others use measures based on a percentage of area median income. Additionally, the FPG vary by family size, but varies only minimally by geography. There are only three sets of measures: one for the 48 contiguous states and the District of Columbia; one for Alaska; and one for Hawaii. This inconsistency in establishing eligibility makes coordinating and integrating programs and services for families extremely challenging.

Studies have demonstrated that an income high enough to survive is more than twice the Official Poverty Measure (OPM) in some geographic areas. The Supplemental Poverty Measure (SPM) threshold, which factors in a broader bundle of basic needs expenses, defines resources to include government assistance through the tax system and in-kind transfers such as housing subsidies and the Supplemental Nutrition Assistance Program (SNAP). Both the OPM and the SPM fall short of accurately representing the amount of people in our communities who cannot survive and provide for their families. In order to truly address poverty in America, we need an accurate representation of who is struggling.

The Council should consider working across federal agencies to address the following:

- Eliminate unnecessary or punitive administrative regulations that make accessing benefits difficult (e.g., streamline eligibility and recertification processes for needed services). During the COVID-19 pandemic, many public and private agencies at the state and local levels found ways to set aside burdensome and unnecessary application procedures. The Council should lift up the learning from these real-time experiments;

- Consider how program guidelines can be applied consistently to aid in the coordination and integration of services; and

- Consider how poverty measures can be used to gain a more accurate picture of who is struggling in a particular place and what level of income may be needed to achieve economic security and mobility.

E. Economic Mobility, Health, and Well-Being Are Intertwined – Integrate Medical Care and Social Services to Improve Health Outcomes and Economic Mobility

Multiple environmental factors contribute to the health and well-being of individuals and families. Health professionals and organizations are beginning to identify and address social determinants as powerful predictors of a person's health. Cross-industry, interdisciplinary efforts to address these social determinants – including economic stability, neighborhood characteristics, and education – as a form of preventative health care are essential. Access to affordable, equitable health care is becoming more and more elusive, and addressing social determinants of health can increase the well-being of people with lower incomes and circumvent costly health issues in the future.

Improving the health and well-being of individuals and families is the shared goal of those working in the health care industry and those operating predominately in the human service ecosystem. Over the last few years, leaders in both sectors have recognized that the effective integration of community and medical services shows great promise for improving long-term outcomes for individuals and lowering overall costs. More recently, the COVID-19 pandemic has underscored not only that everyone's health is inextricably linked but also that while all communities are experiencing harm, some groups are suffering disproportionately – including people of color, workers with low incomes, and people living in areas that were already struggling financially before the current economic downturn. Faced with these new insights and challenges, more leaders feel a fierce sense of urgency and opportunity that we must join with new partners to find new solutions. Business as usual is no longer an option.

Economic status is one of many determinants of health, with poverty's material hardship and the stressful conditions that accompany it at one end of the spectrum. Poor economic status has wide-ranging effects on health. It is also true that adults with physical and mental ailments, and parents with children that have physical and mental illness, also face significant challenges that may negatively impact their ability to successfully learn, earn, and achieve economic success. The Council should consider working across federal agencies on the following:

- Identify and prioritize collaborative approaches between health care and social services at the federal, state, and local levels that spur integration and innovation and help individuals and families achieve health and well-being;

- Issue joint guidance encouraging collaboration on local community needs assessments required by various programs; and

- Issue joint guidance encouraging coordination at the state and local level to follow COVID-19 protective measures, and when a COVID-19 vaccine is available, connecting people with low incomes to vaccine resources.

3.2. As a state, community, or provider, what are your suggestions for how to make federal workforce and work support programs work better together in your state or community at this time and in the long-term? Please share any examples of effective federal program coordination.

Individuals in need of workforce support have their own unique capabilities, desires, and areas for growth. Some workers are parents as well as workers, others are young adults just starting their work life. Programs must be flexible and able to provide or connect these individuals to supports beyond training and education, such as child care, transportation, housing, health and behavioral care. Individuals need customized plans and supports that fit their lives and dreams.

CAAs have extensive experience integrating a wide range of programs at the local level. For example, Aroostook County Action Program, Inc. (ACAP), located in northern Maine, has blended federal, state, and private funding to provide integrated services to individuals and families to help them on their journey to economic mobility. Over the course of several years, ACAP has shifted their approach to serving individuals and families and now uses a streamlined intake process with a common application and high-quality navigation and family-centered coaching. ACAP currently has seven coaches supported by multiple funding sources. These integrated services are provided by braiding a suite of funding that includes Community Services Block Grant (CSBG), Head Start, Early Head Start, the Low Income Home Energy Assistance Program (LIHEAP), and the Weatherization Assistance Program (WAP).

In 2017, CAAs received nearly $280 million in Workforce Innovation and Opportunity Act (WIOA) and other Department of Labor employment and training funding. CAAs lead and/or participate in local one stop efforts to coordinate workforce and work supports. These collaborations are natural for CAAs, which bring a wide range of programs together to respond to the needs of struggling families.

Many CAAs lead and/or participate in their local Housing and Urban Development (HUD) Continuum of Care program (CoC).[11] The CoC program is designed to: promote community-wide commitment to the goal of ending homelessness; provide funding to local partners to re-house homeless individuals and families; promote access to mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness. In many local communities, this model has created the space for partners to come together to increase communication, better coordinate programs, and, in some cases, integrate available funding and services to end homelessness.

Through offering training, technical assistance, and guidance, federal agencies should encourage the maximum use of program flexibility, and service and support integration, to help respond to the unique needs of each individual. Suggested activities and strategies to help federal workforce and work support programs better collaborate locally are as follows:

- Pursue at all levels—federal, state and local—the development of sustainable, integrated, and person-centered networks of supports and services for workers seeking to advance their skills and income.
    - o Work across public and private sectors, and engage multiple systems such as education, health, workforce development, housing, transportation, and others.

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[11] DEP'T OF HOUS. AND URBAN DEV., CONTINUUM OF CARE (COC) PROGRAM, HUD EXCHANGE, https://www.hudexchange.info/programs/coc/ (last visited Sept. 28, 2020).

o Encourage cross-sector and cross-system commitment to shared community assessment and planning to deepen a common understanding of the challenges people with low incomes face and identify possible solutions.

- Engage individuals and families in the design, planning, and operation of workforce and work supports so the systems are responsive to their needs, barriers are reduced, and access is increased. Recognize notable examples and support organizations that are pursuing human-centered design and journey mapping to increase program efficiencies and customer satisfaction.

- Increase access to hubs or one-stops that coordinate services across multiple delivery systems. Past efforts at service integration have demonstrated improved access, increased efficiency, and enhanced outcomes.[12] Local leaders need flexibility to assemble the unique set of local partners to play a role in integrating and coordinating services and supports for struggling families in their own community.

3.3. As a state, community, or provider, what do you think are the immediate barriers preventing federal workforce and work support programs from collaborating in your state or community? What are the long-term barriers?

In some places, existing workforce programs are hampered by limited funding and performance standards that prevent agencies from serving individuals who need higher levels of support. Additionally, there are some in the workforce system whose strict view of the types of supports individuals may need to succeed at work may prevent housing, health, substance abuse, and other important partners from being included in workforce coordination and planning efforts.

Right now, CAAs and many of their local partners are overwhelmed by the food, housing, and other basic needs of individuals and families brought on by the COVID-19 pandemic. Some CAAs have seen as much as a 200 percent increase in requests for assistance. CAAs are utilizing both long-standing and new partner collaborations to meet these needs.

3.4. How can federal agencies collaborate and coordinate to help program operators foster participant economic mobility, recovery, and resilience, using administrative authorities such as joint communications, technical assistance, and program guidance? What are specific examples based on your experience?

In the coming years, local communities will endeavor to help workers become reemployed, reskill, and recover from the pandemic. The Council should prioritize working across federal agencies to strengthen the federal, state, and local response to helping low-wage, low-skilled workers – especially minorities, women, and young people – retrain and prepare for high-demand jobs. Developing new skills will be critical for many workers in order to achieve economic mobility.

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[12] SOCIAL SERV. INTEGRATION, CNTY. HEALTH RANKINGS & ROADMAPS, https://www.countyhealthrankings.org/take-action-to-improve-health/what-works-for-health/strategies/social-service-integration (last visited Sept. 28, 2020).

The Department of Energy (DOE) should be added to the interagency Council on Economic Mobility. As a principal federal source for "greening" the economy, DOE policies and programs – particularly WAP – have a significant impact on individuals and communities with low incomes.

For example, WAP not only provides energy efficiency upgrades to 35,000 eligible homes annually, the program supports 8,500 jobs in this in-demand sector. Within the energy industry, energy efficiency is the fastest growing field, employing twice as many workers than the fossil fuel economy.[13] These installers, energy auditors, quality control inspectors, and program managers contribute to local economies. These jobs cannot be outsourced, and over time, provide a career ladder for greater opportunities. The WAP network also leverages its DOE core funding, skilled workforce, and latest technology to partner with utility companies and private contractors, maximizing its reach and ensuring more families benefit from energy savings.

DOE also supports the development and expansion of the renewable energy sector. According to the Bureau of Labor Statistics, wind turbine service technicians and solar panel installers are among the top three "fastest growing occupations" in the U.S., with median annual pay for both positions in the $45,000 to $53,000 range.[14] And over the past ten years, solar jobs have increased 167% nationwide.[15]

For energy efficiency and renewable energy, the Council should encourage greater equity within the workforce. The Council should recommend additional incentives to ensure such underrepresented populations as people of color, women, and returning citizens benefit from these booming industries. Training and hiring local residents are also key. Rural communities, particularly those traditionally driven by the fossil fuel economy, need targeted investment as well.

Other recommendations:

- Provide local agencies relief and flexibility to respond to the COVID-19 pandemic, including approval to use categorical eligibility to expedite the processing of basic needs assistance.

- Issue joint agency guidance encouraging categorical eligibility where allowed, affirming discretion in setting eligibility criteria and reducing recertification burdens when allowable so states and local agencies can streamline eligibility processes.

- Issue joint guidance encouraging collaborative community needs assessments and making the case for the benefits.

- Issue program guidance clarifying how funds can be blended and braided. See these examples:

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[13] E4THEFUTURE, ENERGY EFFICIENCY JOBS IN AMERICA 2019 1 (2019), available at https://e4thefuture.org/wp-content/uploads/2019/09/Energy-Efficiency-Jobs-in-America-2019.pdf.

[14] Bureau of Labor Statistics, Fastest Growing Occupations (last visited Sept. 28, 2020), available at https://www.bls.gov/ooh/fastest-growing.htm.

[15] THE SOLAR FOUNDATION, 10TH ANNUAL NATIONAL SOLAR JOBS CENSUS 2019 11 (2020), available at https://www.thesolarfoundation.org/wp-content/uploads/2020/03/SolarJobsCensus2019.pdf.

- - o CSBG IM #139 Federal Matching Requirements AmeriCorps[16] (Clarifies that it is allowable to use CSBG funds to meet cost-sharing requirements for the Corporation for National and Community Service AmeriCorps program); and
    - o CSBG IM #135 Federal Matching Requirements HUD McKinney-Vento[17] (Use of CSBG funds to meet matching requirements for Department of Housing and Urban Development McKinney-Vento Homeless Assistance Programs).

- Issue guidance across federal agencies encouraging a particular collaborative effort. See these examples:
    - o Summer Jobs: CSBG IM #129 Use of Funds to Support Summer Jobs[18]; and
    - o Affordable Care Act: CSBG IM #143 Use of Resources to Support Information and Referral for Affordable Care Act (ACA) Benefits and Services.[19]

- Examples of federal agency collaborations:
    - o Rural Integration Models for Parents and Children to Thrive (Rural IMPACT)[20];
    - o HUD Continuum of Care[21]; and
    - o Strong Cities, Strong Communities.[22]

3.5. How are program cliff effects and high effective marginal tax rates impacting the economic mobility of individuals and families in your community? What methods are being used to address these challenges?

The cliff effect is a phenomenon that is difficult for families to anticipate. It is challenging both to plan ahead for it and to manage it successfully once it occurs. Families need time to adapt as their income makes them ineligible for benefits so that they can maintain new-found stability and succeed in their efforts to achieve economic security.

States have proven effective incubators for possible solutions, including expanded transition services and supplemental buy-in programs to create an "eligibility slope." We strongly recommend the Council identify and lift up best practices and policies that have been

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[16] OFFICE OF COMMUNITY SERVICES, CSBG IM #139 FEDERAL MATCHING REQUIREMENTS AMERICORPS (2015), available at https://www.acf.hhs.gov/ocs/resource/csbg-im-139-federal-matching-requirements-americorps.
[17] OFFICE OF COMMUNITY SERVICES, CSBG IM #135 FEDERAL MATCHING REQUIREMENTS HUD MCKINNEY-VENTO (2014), available at https://www.acf.hhs.gov/ocs/resource/csbg-im-135-federal-matching-requirements-hud-mckinney-vento.
[18] OFFICE OF COMMUNITY SERVICES, CSBG IM #129 USE OF FUNDS TO SUPPORT SUMMER JOBS (2013), available at https://www.acf.hhs.gov/ocs/resource/csbg-information-memoranda-no-129.
[19] OFFICE OF COMMUNITY SERVICES, CSBG IM #143 USE OF RESOURCES TO SUPPORT INFORMATION AND REFERRAL FOR AFFORDABLE CARE ACT (ACA) BENEFITS AND SERVICES (2015), available at https://www.acf.hhs.gov/ocs/resource/csbg-im-143-use-of-resources-to-support-information-and-referral-for-affordable-care-act-aca-benefits-and-services.
[20] See ASSISTANT SECRETARY FOR PLANNING AND EVALUATION, DEP'T. OF HEALTH AND HUMAN SERV., IMPLEMENTATION OF THE FEDERAL RURAL IMPACT DEMONSTRATION (2016), available at https://aspe.hhs.gov/system/files/pdf/224826/ImplementationFederalRuralIMPACT.pdf.
[21] DEP'T OF HOUS. AND URBAN DEV., *supra* note 11.
[22] WHITE HOUSE COUNCIL ON STRONG CITIES, STRONG COMMUNITIES FINAL REPORT (2017), available at https://www.huduser.gov/portal/sites/default/files/pdf/SC2-FinalReport-January-2017.pdf.

successful in reducing cliff effects and preventing families from having to decide between benefits and economic opportunity.

Methods CAAs are using to help families navigate and plan ahead:

- Cliff effect calculators produced locally or by state organizations that can help families project when they might anticipate a cliff, and

- Coaching, case management, and financial capability counseling to help families plan ahead, and take a long-term view of the benefits and tradeoffs of increased income and subsequent loss of benefits.

3.6. What kind of federal operational systems—such as data interoperability, grant, and contract mechanisms—would make it easier to meet your goals related to economic mobility?

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) provide a government-wide framework for grants management. The Uniform Guidance helps to reduce the administrative burden on award recipients, while also reducing the risk of waste and misuse of federal funds. Unfortunately, functions and activities not covered by the Uniform Guidance are administered very differently across federal agencies and programs, which often results in extensive time and money spent managing disparate processes, systems, and reporting requirements. One local leader described that reality this way:

> *We'll have funding from three or four different funding sources, and we have to use their exact paperwork—HUD money from different programs may all have different forms. For a $25,000 once-a-year grant issued by the State (with HUD funding) we may have to submit 100 pages—for the feds, maybe 3 pages. Everyone wants their own system, their own paperwork process.*

The Council should consider the following actions:

- Encourage and support the use of categorical eligibility to reduce redundant eligibility determination and promote more human-centered processes. The Affordable Care Act created new opportunities to integrate Medicaid and human services program eligibility, enrollment systems and related policies. How much of the potential has been realized is unclear and should be examined by the Council.

- Issue guidance on blending and braiding federal funds while maintaining financial accountability.

- Pursue actions to make data sharing easier by modernizing archaic laws and regulations. Start by engaging with local agencies to understand their data-sharing needs, help them recognize where privacy concerns are legitimate, and then refine rules and regulations as

appropriate—balancing the need for client confidentiality with the public interest in accessing valuable data for improvement.[23]

- Work together to build "Uniform Data Interoperability Requirements"

    o Coordinate across federal agencies to promulgate more consistent and harmonized guidance to grantees on data interoperability.
    o Work more closely together on the National Information Exchange Model (NIEM) to improve interoperability of data. Ensuring consistency in the naming, defining, and structuring of data will enable cross-program communication. Build out technical architecture frameworks including the National Human Services Interoperability Architecture to promote effective planning and design of integrated systems. It is important to connect the health and human services work using these tools.

- Reporting (excluding financial reporting) like data can benefit from more uniform guidance across federal agencies. Federal agencies do little to harmonize outcomes, demographics and other reporting elements. Additionally, reporting is often a black hole; data needs to be transparent and public. Federal agencies need to encourage the use of data for continuous improvement and not merely compliance. The Council might consider adopting a framework such as the Human Services Value Curve that encourages moving from a regulative business model to a generative one.[24]

- Federal agencies need to examine rules and policies that prevent covering the full cost of providing services. Payment of full, reasonable costs should include all costs related to delivering services – including both direct program costs and indirect costs, as well as costs related to general operations, capacity building, and innovation. Local agencies also need payment practices that support timely payments from federal and state funders.

- All federal agencies should recognize and accept Negotiated Indirect Cost Rate Agreements (NICRA). In addition to looking at NICRA across federal agencies, the Council should look at policies and guidance provided to states on the use of NICRA and encourage state use of the NICRA.

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[23] ALLIANCE FOR STRONG FAMILIES AND COMMUNITIES AND THE AM. PUBLIC HUMAN SERV. ASS'N, A NATIONAL IMPERATIVE: JOINING FORCES TO STRENGTHEN HUMAN SERVICES IN AMERICA (2018), available at https://www.alliance1.org/web/resources/pubs/national-imperative-joining-forces-strengthen-human-services-america.aspx.
[24] LEADERSHIP FOR A NETWORKED WORLD, THE HUMAN SERVICES VALUE CURVE: A FRAMEWORK FOR IMPROVED HUMAN SERVICES OUTCOMES, VALUE AND LEGITIMACY (Technology and Entrepreneurship Center at Harvard 2014), available at https://lnwprogram.org/sites/default/files/HSVC_Guide.pdf.

3.7. What are the most significant challenges that prevent participants/recipients of federal workforce, work support, and housing programs from fully participating in such programs? Do these challenges present obstacles for participants in meeting their economic and employment goals? For example, are there barriers related to child care, transportation, health, disability, caring for a family member, substance use disorder, etc.?

One of the most significant barriers to an individual's pursuit of additional education or training is the need to work to earn income to meet basic needs. Before the pandemic, a record number of people were working two jobs in order to make ends meet. This reality keeps many individuals interested in advancing their skills from pursuing education and training.

Other barriers that keep individuals from advancing their skills include, but are not limited to, the following:

- Child Care Availability and Affordability
  - The expense of quality child care is a barrier to many individuals wanting to enter the workforce. In some states, the annual cost of child care is equal to tuition at a public university. Availability and affordability were serious concerns in most communities before COVID-19, and now local agencies are even more worried about this continual challenge. We are especially concerned about child care availability in rural places. CAAs have indicated families are having to rely more on family/kinship care. In the past, CAAs had policies about only reimbursing providers that met quality care requirements, but that has become very difficult during the pandemic.

- Transportation
  - While many people in the U.S not in poverty drive cars, people living with low incomes have great difficulty affording and maintaining private transportation; therefore, access to an efficient, affordable, and safe public transportation system is a key factor in their transition out of poverty. However, in many communities, public transportation is either not available where the jobs are or not available at all, and access to a car is paramount for retaining employment, food security, and other essential goods and services. Even when public transportation exists, parents with multiple children have difficulty getting children to care and themselves to work using public transportation, and during COVID-19, many rural transit systems have reduced their services or shut down.

- Education, Literacy, and Language
  - Individuals may have had a bad or inferior educational experience growing up and are afraid to return to school. In some communities, literacy and adult basic education services simply do not exist.
  - In some states, education activities do not meet TANF work requirements.

- Skill Training and Apprenticeship and Post-Secondary Education
  - In many communities, funding is insufficient for training and apprenticeship programs, waiting lists are long, and not all individuals interested can get assistance.

- o Many individuals cannot afford post-secondary education or have debt from previous schooling attempts that they are not able to address.

- Housing Affordability
  - o In most places around the country, housing is not affordable for families below 200% FPL. Many families can barely meet housing expenses even while working full-time. In these circumstances, pursuing further training or post-secondary education is out of reach.

- Discriminatory Policies
  - o Historically, certain demographic groups—including racial and ethnic minorities, individuals with disabilities, and previously incarcerated individuals—have been excluded from accessing quality housing in safe areas. HUD receives thousands of complaints of discriminatory housing practices each year. We support expanding current housing discrimination prohibitions to include sexual orientation, gender identity, source of income, and marital status. We also oppose any changes in housing discrimination policy that will make it easier for housing providers to discriminate against potential consumers. These include changes to the enforcement of the Fair Housing Act (FHA) that shift the burden of proof from the housing provider to the potential consumer, and relaxing mortgage disclosure requirements that hold financial institutions accountable for their loan origination decisions.

- Health, Behavioral Health, and Dental Services
  - o Individuals who experience health or behavioral health challenges often are unable to afford or access care. Leaving issues untreated often makes retaining employment difficult. Or an individual must act as primary caretaker of another sick family member and is unable to go to work. Serious untreated dental issues can also prevent individuals from securing or retaining employment. Many health, mental health, and dental services were difficult to access before COVID-19; these services are even more difficult to access now.

- Substance Abuse and Recovery Services
  - o The opioid crisis continues to ravage communities across the country. From 2000 to 2014, overdose deaths from opioid and heroin use increased by 200 percent.[25] Individuals needing recovery services are often not ready to access workforce services, but finding treatment can be very difficult. Even before COVID-19, the waiting lists for clinics and other treatment centers were often long.

- Telecommunications
  - o Advanced telecommunications capability has become a necessity of everyday life for many Americans, and during this time of social distancing imposed by

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[25]Rose A. Rudd, MSPH, Noah Aleshire, JD, Jon E. Zibbell, PhD & R. Matthew Gladden, PhD, *Increases in Drug and Opioid Overdose Deaths — United States, 2000–2014*, 64 CENTERS FOR DISEASE CONTROL & PREVENTION MORBIDITY AND MORTALITY WEEKLY REPORT 1369, 1378 (2016), available at https://www.cdc.gov/mmwr/pdf/wk/mm6450.pdf.

COVID-19, the need has been greatly amplified. High-speed internet access is essential for education, healthcare, and economic opportunity. Despite recent advancements, more than 24 million Americans are still without adequate broadband services. Within that group, dramatic inequalities persist between urban and rural areas. Where access is available, many households are not able to afford internet. This can create a barrier to accessing a range of workforce and work supports.

- Justice-Involved Individuals
  - Justice-involved individuals often have multiple barriers to accessing workforce and work supports, and support services for this population—including the ability to have a nonviolent criminal record expunged—are often not available. Adequate funding for reentry programs (both pre- and post-release) and "ban the box" proposals that do not require conviction disclosure on employment and housing applications are critical.

- Social Capital
  - Some individuals lack the social networks and supports that can help connect them to workforce services and work supports. Not only are these individuals more likely to be unaware of such resources in their community but also their isolation can have a negative impact on their feeling of self-worth. Others may not have people they can call on for assistance with child care, transportation, or financial assistance while they are training or starting a job.

As the COVID-19 pandemic continues, most of the issues outlined above have been exacerbated. Additionally, such complications as food insecurity, utility, and water service delinquencies have exponentially increased.

3. 8. How can federal agencies better work together to help participants, including those facing multiple barriers, overcome these barriers in the short term and achieve economic mobility and resilience in the long term?

As noted earlier, streamlining and modernizing of eligibility and application mechanisms would help people navigate burdensome processes. The Council can work together to encourage the use of existing flexibility, harmonize eligibility, and promote innovative solutions that increase access. Additionally, leaders at all levels need to consider how processes may be screening out persons of color and identify measures to address any barriers.

Federal agencies and programs must appreciate that progress takes time: outcomes are not achieved overnight. In some cases, local agencies need to be able to work with families for an extended period, and the flexibility to reduce caseloads when necessary is essential.

CAAs are uniquely suited to work with individuals facing multiple barriers. Most CAAs provide a wide array of services, and provide case management or coaching services that meet people where they are. However, CAAs often face push back from federal and state funders when they seek to blend funding to support case management or coaching services. Federal agencies could help local agencies in this area by making sure federal staff at all levels, including

the regional offices, share a priority to provide intensive, person-centered services, and the importance of using program flexibilities and resources to maximum benefit.

3. 9. What federal rules do you wish had more flexibility? What flexibilities do you need to respond to economic crises?

Eligibility criteria across federal programs vary greatly and create many challenges for local agencies and the individuals and families they serve. Significant resources are used to determine eligibility over and over for households seeking multiple services. More flexible criteria would allow increased uniformity between criteria of different programs, streamline access, and increase service provision.

Specifically, CAAs recommend CSBG eligibility levels be increased to 200% of poverty as is included in recent CSBG reauthorization proposals. Items eligible for purchase with SNAP funds should include non-food products such as household cleaners, hygiene products, and over-the-counter medications. Broad limitations on the eligibility of people with felony convictions as well as undocumented individuals and family members to receive federal services should be lifted. Work requirements for programs including TANF, SNAP and child care should be less stringent. Finally, asset caps should be increased or removed for federal public assistance programs.

Greater flexibility to use categorical eligibility is also needed, especially during the COVID-19 pandemic when demand for rental and mortgage assistance and other financial assistance is creating challenges to timely processing of applications. Some states have been amenable to approving recent categorical eligibility requests. We hope these experiences can be positive learning opportunities and adopted more broadly and permanently.

The use of eligibility levels that do not take into account the variances (e.g. cost of living) in local conditions create real challenges. CAAs in certain areas would prefer the option of using a level such as percentage of area median income as is done in many HUD programs.

Many CAAs report experiencing significant barriers and obstacles when they seek to integrate participant data in an agency enterprise management information system (MIS). Rules regarding data sharing and protecting personally identifiable information (PII) seem to be applied in an uneven manner across federal agencies. Some programs are more difficult to integrate in an MIS than others. Clarifications on existing rules and more flexibility would assist CAAs in managing and making data-informed decisions and improvements. Also related to this problem is the requirement that many federal programs (and state programs operated as pass-throughs to local agencies) require grantees to use very specific management information systems. For organizations like CAAs – that may manage upwards of 40 different programs – this requirement results in CAAs managing multiple management information systems. This results in many inefficiencies.

Greater flexibility and efficiency is needed in managing no cost extensions to grants and cooperative agreements. The process is very cumbersome and time consuming.

3.10. What do you wish government officials knew about your work?

  CAAs work in every corner of our nation, serving small towns and big cities. They serve families, seniors, adults, and youth all over the country. They know from experience that every community faces obstacles, but also that no two communities face the same barriers to progress. Community Action rejects the idea of one-size-fits-all solutions to poverty. CAAs rely on the diverse perspectives of both community members (particularly those with lived poverty experience) and state and local officials to guide community change. Community Action leaders are at city halls, state legislatures, and on Capitol Hill, advocating alongside community members.

  We pride ourselves on a truly evidence-based approach. Each agency completes a community-specific assessment to drive solutions that respond to local needs, because we know that effectively addressing poverty across different states or even in neighboring counties requires a tailored approach. CAAs tap the power of local volunteers to help their neighbors improve their lives and build more resilient communities.

  CAAs deliver a rich mix of services and community development interventions to help adults, children, and families stabilize and improve their lives. For example, each year CAAs help:

- over 4 million children and families access child care, after school programs and more;
- put more than 5.8 million people on a pathway to good jobs through employment supports;
- 339,000 people to obtain safe, affordable housing, and millions more to receive energy assistance; and
- more than 8 million people obtain food and health care services.

  Community Action serves more than 15 million individuals annually, and often the poorest of the poor. Of the 4.45 million families served by Community Action in 2017, over 70% were at or below the Federal Poverty Guidelines (FPG). Nearly 1.5 million of these families were "severely poor," with incomes at or below 50 percent of FPG. Approximately 90% of all families coming through Community Action's doors include a worker, an unemployed job-seeker, or a retired worker. Additionally, 20 percent of CAA program participants are disabled.

  CSBG is what unites all CAAs, identifying each one as the lead anti-poverty organization in their respective communities. CSBG may be a small portion of a local agency's budget, but it is one hundred percent of its mission. The CSBG Act spells out important tenets of CAAs, including: a data-driven community needs assessment, as noted above; a "tripartite" board of directors composed of elected officials, the business sector, and community members with low-incomes; and the "maximum participation" of members with low-incomes to help empower them in responding to local community needs. In other words, values, ethics, and laws require local members – including people living in poverty – to guide and steer local CAAs. It is in the network's DNA to share power across different income levels, across sectors, knowing that all belong, and all have gifts and wisdom to contribute.

  Community Action is grounded in a robust performance management framework that ensures accountability at all levels of the network – federal, state and local.[26] Federal and state

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[26] OFFICE OF COMMUNITY SERVICES, CSBG IM #152 ANNUAL REPORT (2017), available at https://www.acf.hhs.gov/ocs/resource/csbg-im-152-annual-report.

accountability measures address areas such as training and technical assistance, and timeliness in the distribution of funds. At the local level, CAAs must meet or exceed organizational standards across a range of domains including community engagement, strategic vision and board governance, and finance and operations.

The Results Oriented Management and Accountability (ROMA) framework of continuous improvement guides all levels of the network in ensuring high-quality services and strategies. Performance indicators addressing individual and community-level measures across funding streams are captured in a local agency's data set. All levels of the network use and analyze this data to inform decision making.

CAAs manage a range of public and private resources. Each local agency has its own unique mix of services and integrates many federal funding streams at the local level. Essentially, CAAs function as local "economic mobility councils." For over 56 years, CAAs have developed and maintained efficient and effective practices and systems to manage and account for funding, impact, and return on investment. Below is a snapshot of resources in the CAA Network in 2017 (the last year for which information is available):

- $14.1 billion from federal, state, local and private sources
  - Federal Funding totaling $8.9 billion
    - $669 Million CSBG
    - $3.1 Billion Head Start and Early Head Start
    - $437 Million Temporary Assistance for Needy Families (TANF)
    - $1.4 Billion Low-Income Home Energy Assistance Program (LIEAHP)
    - $212 Million Women, Infants, and Children (WIC)
    - $305 Million Department of Housing and Development (HUD) Section 8
    - $164.7 Million Other HUD Funding (Sec. 202, Emergency Solutions Grant, Continuum of Care, etc.)
    - $278 Million Department of Labor (DOL) Workforce Innovation and Opportunity Act (WIOA) and other DOL Employment and Training
    - $162 Million Department of Energy (DOE) Weatherization Assistance Program (WAP)
  - $1.8 Billion State Sources
  - $1.6 Billion Local Sources
  - $1.5 Billion Private Resources
  - $298 Million - Value of Volunteer Hours

The Network maximizes these funds to provide life-changing services that increase stability and economic security, building pathways to opportunity. CAAs provide critical short-term, financial relief. Addressing material hardship is important as it provides a backstop, preventing families from falling further down into greater economic insecurity, and perhaps becoming homeless. Material hardship can create stress in families. If child stress responses remain activated at high levels for long periods, this can have a significant wear-and-tear effect on the brain and other biological systems.

CAAs are not only about financial relief, but also human capacity building. A person-centered, strength-based design guides such longer-term work with families and individuals. Often taking a whole family approach, CAAs may streamline access to employment and training for a Head Start parent while ensuring that their young child receives a high-quality education.

Coaching and case management dovetail well with this approach, as a staff person builds a rapport with a family member and serves as a sounding board for discussing and achieving longer-term life goals. We know social support is key to our success no matter our income levels, and often CAAs will intentionally convene community members on a regular basis so they can learn from one another and encourage one another – all while growing their social capital.

Metropolitan Action Commission in Nashville Tennessee is a prime example of a local agency taking a whole family approach. The agency has combined a robust workforce training program with Head Start/Early Head Start. Approximately 10 percent of their parents are ages 18-24. CSBG funding is used to help parents obtain a High School Equivalency diploma/GED, Child Development Associate (CDA), which enables them to qualify for entry-level teaching positions, CompTIA A+ Certification, which is a gateway credential for careers in Information Technology, or increase proficiency in English as a Second Language (ESL). Students in the CompTIA A+ program are provided an internship placement within local technology companies. Metro Government's Information Technology Department has hired students from the program. The students seeking their CDA intern at the agency's early childhood education program, Head Start, as they pursue their associate's degree. Upon completion, students are offered full-time teaching positions by the agency.

Community Action not only provides direct services for individuals and families, but also creates community change. Working in tandem with local partners, Community Action is often the convener and catalyst for addressing wicked or complex community problems. Such problems include housing, transportation, opioid addiction, and infant mortality in African American families. We know these issues require engaged leadership, cross-sector collaboration and perseverance.

Community Action's Response to COVID-19

When COVID-19 wreaked havoc on our communities, Community Action's systems and services shifted to meet the crisis head-on. The Community Action Network has pivoted not only to continue providing assistance to people experiencing hardship across America, but also to rapidly expand services, implement new strategies, and engage community partners in joint problem solving. In communities large and small, rural and urban, CAAs have risen to the challenges created by the crisis. The quick thinking and bold actions of agencies will help guide communities out of the devastation caused by the pandemic and get the future right.

For example, in Maine, as in several other states, the Governor's office identified Community Action as a ready conduit to implement a statewide COVID-19 rental assistance program. The program was operated through the 10 Maine CAAs to provide assistance to those unable to pay their rent because of the pandemic. The Governor dedicated $10 million to the program, allowing CAAs to offer $1,000 to eligible customers for a period of three months in order to stay sheltered.

3.11. What workforce and work support programs more easily align with others?

As noted in the prior answer, CAAs integrate a number of federal resources depending on family needs. CAAs often bundle CSBG, Head Start, and WIOA as part of a whole family approach. As families need rental assistance, food or utilities in order to stay in school or maintain employment, additional programs are added to the bundle. Robust coordination takes

place between LIHEAP and WAP. Many CAAs take WAP applications as part of their LIHEAP process, providing longer-term savings on energy bills.

States award approximately $430 million annually to CAAs which is often utilized alongside CSBG funding to support adults in pursuing training and securing and retaining employment.

New since the COVID-19 pandemic are partnerships that CAAs are making with health and public health stakeholders to provide supports to individuals asked to quarantine. As CAAs are seen as trusted community organizations, CAAs are setting up testing sites and helping reach "the hard to reach."

3.12. What are your suggestions for how to proactively support workforce preparation prior to an individual needing to participate in a federal workforce or work support program, such as programs focused on youth?

As outlined in our suggested priorities for the Council in question number one, Community Action believes in "going upstream" and addressing issues of place, structural racism, material hardship and health in order to help children reach their full potential. The rationale for some of these upstream solutions are noted below and will go a long way to being proactive early.

We know from Raj Chetty's work on economic mobility that place matters for mobility. Chetty's research has demonstrated poverty is sticky and the chances a child born in poverty will do better than his/her parents has eroded since 1940. There are significant differences in upward mobility rates across different places too, right down to the county and city level. Cities in the Deep South and Midwest tend to have more sluggish mobility than other regions. Children who move from a low-mobility area to a higher-mobility area do better in life as measured by earnings, education, and even marriage rates. The earlier in the child's life the move, the greater the benefit.[27] Every year of exposure to a high opportunity neighborhood pays off for children. High opportunity neighborhoods have more stable family structures, lower poverty rates, better school quality, and greater social capital. This information indicates policymakers should improve neighborhoods and perhaps help families move to higher opportunity areas. However, moving families away from their existing support system and families is complicated. If we want to get ahead of the need for workforce and work supports, we should look at how we might improve neighborhoods, reduce segregation, improve schools, and build more social capital in local places.

We know investing early in a child's life can have long-term positive impacts. We also know that parents are central, and we need to support both children and their parents at the same time. Providing parents with financial and concrete supports helps parents be the best they can be. Providing supports to all parents, but especially young parents ages 16-24, would benefit both generations.

In his book, *Our Kids: The American Dream in Crisis*, Robert Putnam described the diverging life chances of children in rich and poor families. Putnam's work demonstrates that people struggle to move up the economic ladder. Kids from higher income families benefit from

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[27] Richard V. Reeves and Eleanor Krause, *Raj Chetty in 14 charts: Big findings on opportunity and mobility we should all know*, BROOKINGS INSTITUTION (Jan. 11, 2018), https://www.brookings.edu/blog/social-mobility-memos/2018/01/11/raj-chetty-in-14-charts-big-findings-on-opportunity-and-mobility-we-should-know/.

quality child care, better schools, extracurricular activities, and more. While poor kids may experience poor quality child care and schools, limited afterschool enrichment, and perhaps even a few adverse childhood experiences, we pour on enrichment and advantages to children who from the start already have incredible advantages. Programs such as Head Start, Home Visiting, Youthbuild, and Summer Employment provide important enrichment and remediation to children and youth without these advantages. These opportunities are essential, and we need more of them in order to help children and families reach their full potential.

The Earned Income Tax Credit (EITC) has been proven to be one of the most effective tools for preventing and reducing poverty. Increasing eligibility caps for the credit would allow many more individuals and families to access it, preventing them from sliding into poverty and expanding the path toward achieving their fullest potential. Increased funding for Volunteer Income Tax Assistance (VITA) sites would ensure that workers eligible for the credit are aware of and have access to it. Many CAAs around the country host and support VITA sites in their local communities.

3.13. Are there existing workforce programs or strategies that have not historically been widely accessible to lower income individuals and families that could help them achieve economic mobility, recovery, and resilience if they had better access to them? If so, please identify.

From our experiences locally we have learned that many individuals who could benefit from skill training, education, and employment assistance do not have an opportunity to participate. In FY 2019, WIOA employment and training programs assisted 7.3 million individuals. While workforce development funding has declined since 2001, there was a $30 million increase in funding for FY 2020 over FY 2019 levels.[28] Considering 29 million people claimed unemployment the week of August 29, 2020 (compared with 1.4 million for the same week in 2019), we can expect many more people to be looking for workforce and work support services than will be able to be served.

Many workforce programs are limited and serve only a small number of individuals who might benefit. A CAA staff member from Georgia indicated that the wait list to enter a school sponsored pre-apprenticeship program that helps students earn their high school diploma and develop a marketable manufacturing skill includes four times as many students as there are slots available. People cannot afford to wait for long-term training. They need short-term skills and trade training that gets them into living-wage employment in high-demand fields quickly.

3.14. How does your program define and measure economic mobility? What data do you use?

The Partnership has embraced the definition of economic mobility presented by the U.S. Partnership on Mobility from Poverty. This definition of economic mobility includes the following three dimensions: economic success; power and autonomy – the ability to exercise control over one's personal circumstances and to influence policies and practices that affect

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[28] NAT'L ASS'N OF COUNTIES, 2020 POLICY BRIEF, SUPPORT WORKFORCE AND LOCAL BUSINESS DEVELOPMENT: THE WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA) (2020), available at https://www.naco.org/sites/default/files/documents/2020%20WIOA%20pdf.pdf.

one's life; and a sense of belonging – being valued by one's community. Economic success, autonomy and power, and belonging are interconnected and mutually reinforcing.[29]

As noted above, Community Action uses a results-based performance system that provides flexibility for the 1,000 plus CAAs to select indicators that are appropriate for measuring the community-level or individual-level change they seek to achieve, including those indicators for measuring economic success, power and autonomy, and belonging.[30]

CSBG provides CAAs with a menu of indicators to measure CAA efforts across funding streams or programs. Because CSBG requires CAAs to respond to the unique poverty causes in the area the agency serves, CAAs are given flexibility to select the indicators that make sense for measuring their work. CAAs are also provided an opportunity to design a unique indicator if needed. A sample of the measures included in the results-based performance system that support achievements in economic mobility include the following:

- Employment
    - Unemployed adults obtaining and maintaining employment (for 90/180 days) with a living wage.
    - Living wage jobs created in the community.

- Education
    - Children who demonstrate improved emergent literacy skills.
    - Individuals who obtained a recognized credential, certificate, or degree relating to achievement of educational or vocational skills.
    - Accessible and affordable early childhood education assets or resources added to the identified community.
    - Percent increase in high school graduation rate in the community.

- Income, Infrastructure, and Asset Building
    - Individuals purchase a home.
    - Individuals who report improved financial well-being.
    - Addition of new transportation resources created in the community.

- Housing
    - Individuals who obtained safe and affordable housing.
    - Housing units developed.
    - Increase of affordable housing in the community.

- Health and Social/Behavioral Development
    - Individuals who demonstrated improved physical health and well-being.
    - Percent decrease in the teen pregnancy rate in the community.

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[29] US PARTNERSHIP ON MOBILITY FROM POVERTY, RESTORING THE AMERICAN DREAM: WHAT WOULD IT TAKE TO DRAMATICALLY INCREASE MOBILITY FROM POVERTY? (2018), available at https://www.mobilitypartnership.org/restoring-american-dream.

[30] OFFICE OF CMTY. SERV., ADMIN. FOR CHILDREN AND FAMILIES, DEP'T OF HEALTH AND HUMAN SERV., COMMUNITY SERVICES BLOCK GRANT ANNUAL REPORT VERSION 2.0, OMB #0970-0492, available at https://nascsp.org/wp-content/uploads/2020/05/RPT_CSBG_Annual-Report-V2-1.pdf.

- Civic Engagement
    - Individuals improve their social networks
    - Percent increase of people with low incomes acquire and maintain leadership roles.

3.15. Do you have recommendations for how to define and measure economic mobility that could be used across different programs?

Any model or framework that measures economic mobility must allow local organizations the flexibility to select measures that are meaningful for the communities and families they serve. Community Action's performance management framework allows for that flexibility. The economic mobility metrics recently released by the Urban Institute include a set of metrics that are flexible, but comprehensive in their view of what defines economic mobility.[31]

Thank you for the opportunity to submit comments on the establishment of priorities for the Economic Mobility Council. Please do not hesitate to contact us directly if we can provide any additional information.

Sincerely,

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Arkansas Community Action Agencies Association (Little Rock, AR)
Arrowhead Economic Opportunity Agency, Inc. (Virginia, MN)
Blue Ridge Community Action, Inc. (Morganton, NC)
Central Missouri Community Action (Columbia, MO)
Champaign County Regional Planning Commission (Urbana, IL)
Community Action Agency of St. Louis County, Inc. (St. Louis, MO)
Community Action Association of Pennsylvania (Harrisburg, PA)
Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (Lexington, KY)

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[31] MARGERY AUSTIN TURNER, GREGORY ACS, STEVEN BROWN, CLAUDIA D. SOLARI & KEITH FUDGE, BOOSTING UPWARD MOBILITY: METRICS TO INFORM LOCAL ACTION (Urban Institute 2020), available at https://www.urban.org/sites/default/files/publication/102342/boosting-upward-mobility-metrics-to-inform-local-action_1.pdf.

Community Action Marin (San Rafael, CA)
Community Action of Nebraska (Lincoln, NE)
Community Action Partnership Association of Idaho (Boise, ID)
Community Action Partnership New Jersey, Inc. (Clinton, NJ)
Community Action Partnership of Greater St. Joseph (St. Joseph, MO)
Community Action Partnership of Madera County, Inc. (Madera, CA)
Community Action Partnership of North Dakota (Fargo, ND)
Community Action Partnership of San Luis Obispo County, Inc. (San Luis Obispo, CA)
Community Action Partnership of Utah (Layton, UT)
Community Concepts, Inc. (Lewiston, ME)
Community Relations-Social Development Commission (Milwaukee, WI)
Connecticut Association for Community Action, Inc. (Middletown, CT)
Crowley's Ridge Development Council, Inc. (Jonesboro, AR)
CSRA Economic Opportunity Authority, Inc. (Augusta, GA)
District 4 Human Resources Development Council (Havre, MT)
East Missouri Action Agency (Desloge, MO)
Economic Security Corporation (Joplin, MO)
EnAct Community Action Agency (Charleston, WV)
Georgia Community Action Association, Inc. (Decatur, GA)
Great Lakes Community Action Partnership (Fremont, OH)
I-CARE, Inc. (Statesville, NC)
Kansas Association of Community Action Programs (Topeka, KS)
Lincoln Hills Development Corporation (Tell City, IN)
Lower Columbia CAP (Longview, WA)
Maine Community Action Partnership (Augusta, ME)
Maryland Community Action Partnership (Annapolis, MD)
Michigan Community Action (Okemos, MI)
Mid-Iowa Community Action, Inc. (Marshalltown, IA)
Minnesota Community Action Partnership (St. Paul, MN)
Mississippi Association of Community Action Agencies (Jackson, MS)
Missouri Community Action Network (Jefferson City, MO)
Mohawk Valley Community Action Agency, Inc. (Utica, NY)
New River Community Action, Inc. (Radford, VA)
New York State Community Action Association (Guilderland, NY)
North East Community Action Corporation (Bowling Green, MO)
Northeast Iowa Community Action Corporation (Decorah, IA)
Ohio Association of Community Action Agencies (Columbus, OH)
Ohio Heartland Community Action Commission (Marion, OH)
Opportunities for Otsego, Inc. (Oneonta, NY)
Oswego County Opportunities, Inc. (Fulton, NY)
Ozarks Area Community Action Corporation (Springfield, MO)
People, Incorporated of Virginia (Abingdon, VA)
Sandhills Communtiy Action Program, Inc. (Southern Pines, NC)
Schenectady Community Action Program, Inc. (Schenectady, NY)
Southeastern Vermont Community Action (Westminster, VT)
Texas Association of Community Action Agencies, Inc. (Austin, TX)

Tri-Valley Opportunity Council, Inc. (Crookston, MN)
Utah Community Action (Salt Lake City, UT)
Virginia Community Action Partnership (Richmond, VA)
Washington State Community Action Partnership (Olympia, WA)
West Central Wisconsin Community Action Agency, Inc. (Glenwood City, WI)
Wildfire: Igniting Community Action to End Poverty in Arizona (Phoenix, AZ)