



Association of Nationally Certified ROMA Trainers and Implementers

July 22, 2024

Richard L. Revesz  
Administrator  
Office of Information & Regulatory Affairs  
Office of Management & Budget  
725 17<sup>th</sup> Street NW  
Washington, DC 20503

re: Submission for Office of Management and Budget (OMB) Review; Community Services Block Grant (CSBG) Annual Progress Report (OMB No. 0970-0492)

Dear Mr. Revesz,

On behalf of the CSBG National Partners including the National Community Action Partnership (NCAP), CAPLAW, the National Association of Community Services Programs (NASCSPP), the Association for Nationally Certified Results Oriented Management and Accountability (ROMA) Trainers and Implementers (ANCRT), and Community Action Network (Network) signatories, thank you for the opportunity to offer public comments on the proposed extension and minor changes to the Community Services Block Grant (CSBG) Annual Progress Report, OMB #0970-0492, as outlined in the Federal Register Notice [FR Doc. 2024-14172].<sup>1</sup> The CSBG Annual Report plays a critical role in documenting the story of the impact and in managing and measuring the performance of the Network at the local, state, and national levels.

NCAP serves as the national membership association and hub that links over 1,000 Community Action Agencies (CAA) and State Associations across the country. NCAP's mission is to ensure the causes and conditions of poverty are effectively addressed and to strengthen, promote, represent, and serve the Network. CAPLAW is a membership organization that provides training and technical assistance on legal, governance and management issues to the nationwide network of CAAs. NASCSPP is the national association for the fifty-three state CSBG lead agencies with a mission of increasing capacity in States to achieve economic security and energy efficiency in low-income communities. ANCRT provides training and technical assistance to the Network around performance measurement and management and all areas of the ROMA cycle and has a mission to provide support and continuing education to Nationally Certified ROMA Professionals, collaborating with national, state, and local community action partners to improve the network's ability to achieve, document, report, and analyze results and to use data for decision making. Our extensive experience and deep commitment to the Network make us critical stakeholders in the development and implementation of the CSBG Annual Report.

---

<sup>1</sup> Submission for Office of Management and Budget (OMB) Review; Community Services Block Grant (CSBG) Annual Progress Report (OMB No. 0970-0492), 89 Fed. Reg. 54,004 (June 28, 2024).

All CSBG National Partners and many Network members submitted comments during the 60-day public comment period in response to the previous Federal Register notice entitled “*Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Progress Report (Office of Management and Budget No. 0970-0492)*.”<sup>2</sup> The majority of our submitted comments focused on the proposed Version 3.0, which included significant changes developed and proposed by OCS. In OCS-CSBG-DCL-24-15, OCS indicated they were moving forward with providing an opportunity for final comments of Version 2.1 but would delay submitting Version 3.0 to OMB to allow more time to review the significant feedback received from the Network during the 60-day comment period.<sup>3</sup> We applaud OCS for taking steps to maintain CSBG information collection compliance and continuity via Version 2.1 and for delaying clearance of Version 3.0 to review the substantial number of comments from the Network. **We hope that OCS will use the time offered by completing the clearance for Version 2.1 to also more deeply and intentionally engage with the Community Action Network to co-create an updated reporting instrument that fulfills our shared goals of reducing burden and accurately reflecting the incredible impact of Community Action.**

We are submitting comments on behalf of the CSBG National Partners (including NCAP, CAPLAW, NASCSP, and ANCRT) and the Network members who signed this letter. These comments focus on CSBG Annual Report Version 2.1 and are the culmination of interactive engagements throughout the OMB clearance process which included gathering feedback from the CSBG Annual Report Advisory Group (a diverse group assembled by NCAP representing CAAs, State Associations, and National Partners); a virtual public forum held on May 29, 2024; an in-person forum held on June 5, 2024; Network surveys administered by NCAP and ANCRT; and other interactions with Network members. Some of the comments submitted in response to the 60-day comment period are echoed here due to the interconnectedness of Version 2.1 and Version 3.0, particularly regarding the process OCS used to gather Network feedback to inform proposed changes. Our comments seek to address the questions posed in the Information Collection.<sup>4</sup>

## **I. Background on the Community Action Network, the CSBG Annual Report, and its Importance to the Community Action Network**

Established as part of the War on Poverty in 1964, the Network was created through the Economic Opportunity Act to build grassroots capacity for assessing and addressing local causes and conditions of poverty. The goal was to make communities more responsive to the needs and interests of low-income individuals using federal resources. Although the administration and oversight of funding have evolved since the inception of Community Action, the purpose remains the same: CSBG serves as core federal funding leveraged with state, local, and private funding to coordinate a wide range of local strategies and critical services aimed at alleviating

---

<sup>2</sup> Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Progress Report (Office of Management and Budget No. 0970–0492), 89 Fed. Reg. 29,339 (April 22, 2024).

<sup>3</sup> Office of Community Services, Administration for Children and Families, U.S. Department of Health and Human Services, ACF-OCS-CSBG-DCL-24-15, CSBG Annual Report and PRA Clearance Process Updates (June 28, 2024)).

<sup>4</sup> 89 Fed. Reg. at 54,005-6.

poverty, revitalizing low-income communities, and empowering individuals and families with low incomes. This approach to addressing poverty is both a statutory requirement and the central mission for CAAs sixty years later.

The CSBG Act (the Act) mandates the Department of Health and Human Services (HHS) to prepare and submit an annual report to Congress outlining the activities and performance outcomes achieved through CSBG funding.<sup>5</sup> Per the Act, the report must include details on fund utilization, the number and characteristics of individuals with low-incomes served, performance measurements for both states and local CAAs, and the impact of the services provided.<sup>6</sup> HHS compiles this report using data collected and reported by local CAAs and State CSBG Offices through the CSBG Annual Report before submitting it to Congress.

In late 2016, after over a decade without changes, OCS requested significant revisions to the CSBG Annual Report and after extensive Network collaboration and input, OMB approved the revisions on January 12, 2017.<sup>7</sup> Since then, OCS submitted additional information collection requests (ICRs) proposing minor changes to the report's data. The first two ICRs were approved on February 28, 2020, and November 23, 2020, respectively, and the most recent ICR, approved on June 29, 2021, expired on June 30, 2024.<sup>8</sup>

While the primary purpose of the CSBG Annual Report is to keep Congress informed of the block grant's performance, the CSBG Annual Report serves multiple purposes beyond statutory compliance. State CSBG Offices use the report to monitor and evaluate CAA performance, ensuring effective use of funds to fulfill CSBG's purposes. State and national associations use the data to advocate for new programs and policy changes that advance CSBG's mission. For CAAs, the report is a critical tool for demonstrating their efficacy in addressing locally prevalent causes and conditions of poverty, revitalizing low-income communities, and promoting self-sufficiency.

The Act requires each CAA to engage in a comprehensive triennial assessment of community needs, resources, and partners to receive CSBG funding.<sup>9</sup> This assessment includes collecting quantitative and qualitative data on poverty, customer demographics, and key findings on the causes and conditions of poverty in their service area. Detailed performance outcomes, impact data, and demographics of populations served allow CAAs to showcase their successes, identify areas for improvement, and make data-informed decisions to enhance service delivery and leverage resources. This data is collected, aggregated, and reviewed through the CSBG Annual Report, making the report a critical tool for CAAs to demonstrate they are fulfilling the requirements of the Act by deploying services and strategies to fit unique local needs.

---

<sup>5</sup> 42 U.S.C. § 9917(b)(2)-(3)

<sup>6</sup> *Id.* at § 9917(b)(2)

<sup>7</sup> Office of Information and Regulatory Affairs, Office of Management & Budget, Executive Office of the President, OMB Control Number History, OMB Control Number: 0970-0492, available at <https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=0970-0492#>.

<sup>8</sup> *Id.*

<sup>9</sup> 42 U.S.C. § 9908(b)(11).

## II. Process

On April 22, 2024, OCS published a notice in the Federal Register in which it proposed to continue collection of the CSBG Annual Report data through an updated version of the current information collection with minor changes for use by the Network over the next two years (Version 2.1); and proposed significant changes to the CSBG Annual Report for implementation in Federal Fiscal Year 2026 (Version 3.0).<sup>10</sup> The Network was surprised to see such a significant revision proposed without prior network-wide engagement or input into the proposed changes, especially given the fundamental values of co-creation and power sharing inherent to the Community Action movement. Recognizing that OCS needed to obtain clearance of the CSBG Annual Report to allow for uninterrupted data collection, many Network members and CSBG National Partners suggested that OCS move forward with seeking clearance of Version 2.1, and then engage more robustly and intentionally with the Network to craft updates to CSBG Annual Report Version 3.0 to ensure it is reflective of Network needs.<sup>11</sup> **We appreciate the efforts of OCS in advancing the clearance of CSBG Annual Report Version 2.1. However, we believe that initiating the process with the Network earlier could have allowed for more substantial improvements to the report.**

The CSBG National Partners and Network signatories continue to have concerns about the level of engagement with the Network and the process OCS used to revise the report and seek clearance. While we are pleased to see OCS working to review public comments and pausing Version 3.0 clearance, it remains unclear if OCS intends to further engage the Network before proceeding with the 30-day comment period. Because block grants are broader in scope and offer states discretion in using the funds, reporting has historically been complex and multi-faceted. CSBG adds additional complexity beyond most block grants, as each of the 1,000 agencies awarded CSBG funding is directed by the Act to assess local poverty conditions and causes and use CSBG funds to respond to their unique local conditions. Finally, the multi-pronged purpose of CSBG to address poverty, a complex problem stemming from underlying social and economic structural factors that impact individuals, families, and communities, presents additional reporting challenges as CAA efforts are by design extremely diverse and constantly evolving. **Navigating these complexities calls for engaging the Network in a meaningful way to ensure that the revisions to the CSBG Annual Report truly reflect the diverse needs and efforts of the agencies involved.**

In its Dear Colleague Letter titled “CSBG Annual Report and Paperwork Reduction Act (PRA) Clearance Process Updates” released on June 28, 2024, OCS states “*The Paperwork Reduction Act comment period process allows us to provide an opportunity for every member of the Network and the general public to review these changes and provide comments on the information collection at the same time ensuring that the opportunity for review is robust, equitable, and accessible.*”<sup>12</sup> While the PRA process does not specifically reference an opportunity for Network member voice in the framing of proposed changes (provides only an

---

<sup>10</sup> 89 Fed. Reg. 29,339.

<sup>11</sup> See, e.g., National Community Action Partnership, Comments re: Proposed Information Collection Activity; CSBG Annual Progress Report at 6 (June 17, 2024), available at <https://communityactionpartnership.com/wp-content/uploads/2024/06/NCAP-CSBG-Annual-Report-Public-Comments-F-OMB-No.-0970-0492.pdf>.

<sup>12</sup> ACF-OCS-CSBG-DCL-24-15 at 2.

opportunity for a response to the framing and approach set out by federal staff and contractors), the unique nature of the CSBG network has previously been engaged to provide more extensive input in the revision process. **CAAs, State Associations, and State CSBG Offices are best positioned to understand the impacts of the CSBG Annual Report and, as context and content experts with valuable insights, should play a substantial role in the co-creation of a strategy for updating the Report that informs the PRA approach and process.** Recent guidance from the Office of Information and Regulatory Affairs (OIRA) supports this understanding and affirms that early engagement of stakeholders is critical to effective and equitable federal agency decision making and priority setting.<sup>13</sup>

### III. Necessity of Information

**In general, we agree that the information collected in the CSBG Annual Report is necessary for performance measurement of state and local agencies.** The CSBG Annual Report is a critical tool for CAAs to demonstrate the impacts of their services and strategies tailored to meet the unique needs of their local communities. The Act outlines key purposes of CSBG, executed by the Network at the local level, which include "*to provide assistance to States and local communities, working through a network of community action agencies and other neighborhood-based organizations, for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient*["].<sup>14</sup> Given the diverse strategies and outcomes that may arise in response to local needs and these broad purposes, it is vital that the CSBG Annual Report accommodate this diversity to ensure the reporting accurately represents the wide range of work done by CAAs. CAAs do not report on every data point within the CSBG Annual Report; rather, they select the data points that reflect only their own deployed services, strategies, and achieved outcomes. Thus, flexible reporting that allows for local customization is essential for CAAs to effectively report on their impacts and provide states with the necessary details to support their required oversight.

#### *Federal Reporting of Technical Assistance Plans (TAPs)*

In CSBG Annual Report Version 2.1, Module 1, data point H.4c asks, "*Reporting TAPs: Did the state report all TAPs to the Office of Community Services within 30 calendar days of creation?*"

---

<sup>13</sup> Office of Information and Regulatory Affairs, Office of Management & Budget, Executive Office of the President, Broadening Public Participation and Community Engagement in the Regulatory Process (2023) at 10 ("Broad public input is often most useful at an early stage, helping agencies in choosing among priorities or developing potential regulatory approaches. OIRA encourages agencies to consider how they can prioritize early engagement with affected communities, especially when considering an overall regulatory program... This focus on early engagement with communities during the regulatory agenda setting process is consistent with Executive Order 14094, section 2(c), which calls on agencies to proactively engage interested or affected parties" to "inform the development of regulatory agendas and plans," as well as Executive Order 14091, section 5, which calls on agencies to "conduct proactive engagement, as appropriate, with members of underserved communities [to inform]" "selection of items for their respective regulatory agendas and plans.")

It is unclear why OCS asks this question, as there are no statutory requirements for states to report TAPs to OCS. The Act recognizes Quality Improvement Plans (QIPs) for addressing issues of noncompliance. TAPs were introduced as additional tools to collaboratively support compliance with the CSBG Organizational Standards. State CSBG offices are responsible for the oversight and monitoring of CSBG Eligible Entities (typically CAAs) and use various tools like QIPs, TAPs, and other corrective action plans to address issues of noncompliance or technical assistance needs. Since oversight is the responsibility of the states, and states vary in what they call these tools and what constitutes an issue of noncompliance, we believe that reporting TAPs as corrective actions to OCS is inappropriate. Section H.5 of the CSBG Annual Report already provides sufficient information to alert Congress and OCS to significant issues of noncompliance and ensure states address them as required by the Act. Asking for detailed reports on TAPs could mistakenly imply that a CAA receiving technical assistance has significant issues of noncompliance warranting federal attention. **We recommend removing the TAP reporting requirements (Module 1, H.4a.-H.4c.) from the CSBG Annual Report to avoid unnecessary complications and potential misrepresentations of CAA compliance.**

#### IV. Quality

##### *Community Level Transformation*

A core purpose of CSBG is to not only create individual and family-level change but also to revitalize communities of low-income.<sup>15</sup> CAAs regularly work at a broader community level, such as developing housing, addressing structural racism, and creating jobs. However, the current CSBG Annual Reporting process does not accurately portray this essential CAA work due to inconsistent understanding and implementation of revisions made to the report in 2017. Following significant revisions in 2017, reflected in CSBG Annual Report Version 2.1, the updated reporting form was not accompanied by appropriate training and as a result, posed challenges for local CAAs and states. CAAs that completed Module 3 (community-level work) submissions early on received limited or contradictory feedback. OCS also restricted Module 3 reporting to new initiatives only, excluding ongoing community efforts such as operating community transportation systems and affordable housing complexes. This limitation not only diminishes the recognition of sustained infrastructure and community assets supported by CAAs, but also obscures the substantial benefits CAAs bring to communities. Further, OCS' guidance that Module 3 is "optional" has reduced Network utilization of Module 3. CAAs are required to report only on the indicators and services applicable to their efforts; thus, reporting in Module 3 should be no less optional than any other section of the report. This has led to an overall underreporting of community-level change efforts which counteracts the intent of the statute. We are especially concerned that recent CSBG Reports to Congress do not include any community-level change outcomes.<sup>16</sup>

---

<sup>15</sup> Community Services Block Grant Act, 42 U.S.C. § 9901(1).

<sup>16</sup> CSBG Reports to Congress, The Administration for Children and Families (April 12, 2024), available at <https://www.acf.hhs.gov/ocs/report/csbg-reports-congress>.

The ability to pursue community change is fundamental to CSBG's statutory purpose; it is the cornerstone of CAAs' mission and should be reflected within the CSBG Annual Report. Very few federal funding sources support such flexible and transformative community change efforts. We believe a renewed focus on community-level data is imperative. The quality of the report is negatively impacted by these gaps. **While we recognize that the expiring clearance limits capacity to consider updates, it is essential to recognize that Module 3 captures and reflects the important and ongoing work of CAAs at the community level. We encourage OCS to update its guidance to recognize Module 3 is not any less optional than other sections of the report.**

## V. Clarity

Clear and comprehensive guidance is crucial for ensuring that CAAs can accurately and effectively report their activities and outcomes in any version of the CSBG Annual Report. Accessible and detailed guidance helps the Network understand the reporting requirements and ensures consistency and reliability in the data collected. Clear definitions and comprehensive guidance are essential for reducing the reporting burden and improving data quality across the Network.

**We recommend that OCS work with the Network to develop reporting guidance and definitions.** CAAs, State Associations, and CSBG State Offices, who work with this data every day, are best positioned to provide insights to OCS to inform instructions that are clear, realistic, and meet the needs of the Network. By engaging the Network in the creation of reporting guidance, OCS can ensure that definitions and guidance are both practical and reflective of the on-the-ground realities states and CAAs face. Collaborating with the Network in this manner will not only improve clarity but also foster a better understanding of the implementation process.

## VI. Burden

The CSBG National Partners and Network members acknowledge the burden the CSBG Annual Report imposes at the local, state, and national levels, and that this burden is recognized by OCS. Given the urgency of the current clearance expiring, we understand that there is limited time to explore and address the root causes of this burden. **However, we hope that future updates to the CSBG Annual Report will involve network input and co-creation of solutions to mitigate this burden and develop a report that is reflective of the impacts of the Network.**

### *Burden Estimate*

In prior comments, CSBG National Partners and Network members identified several questions for OCS clarification that remain unaddressed. Understanding OCS' method for determining burden estimates is crucial for providing thoughtful feedback. We reviewed the burden hour estimates, which are statutorily required as part of all ICR processes, across several CSBG Annual Report clearance activities in recent years, which raised questions about the burden

estimates. We have compiled the estimated average burden hours per eligible entity response into the chart below:

Date	Notice Type	Version	Estimated Average Burden Hours Per CAA Response
October 2, 2019 <sup>17</sup>	60-Day	2.0	242
January 22, 2020 <sup>18</sup>	30-Day	2.0	697
November 19, 2020 <sup>19</sup>	Expedited (60 Day)	2.0	697
April 26, 2021 <sup>20</sup>	30-Day	2.0	697
April 22, 2024 <sup>21</sup>	60-Day	2.1	493
April 22, 2024 <sup>22</sup>	60-Day	3.0	260
June 28, 2024 <sup>23</sup>	30-Day	2.1	493

These wide-ranging burden estimates raise several questions; for example, what accounts for the decrease in estimated hours per response between Versions 2.0 and 2.1, given that the latter includes only “clarification revisions”?<sup>24</sup> **We recommend OCS provide clarification and additional information regarding the process or formula used to determine the average burden hour estimates to help the Network assess the estimated burden hours per CAA response for various collections.**

#### *Burden Reduction Suggestions*

CAA data goes through several layers of validation to check for accuracy and completeness prior to becoming final. This usually involves a quality check at the local level, followed by a quality check at the state level using validation tools provided through SmartForms or other guidance from OCS’ training and technical assistance provider NASCSP; and then a final validation at the federal level. While reviewing data for completeness and accuracy is essential to ensuring a quality report, some of the currently used validations create unnecessary burden.

Although States are not required to submit comments addressing flagged validations when submitting their CSBG Annual Reports, many do so preemptively to reduce the number of flagged validations on the data quality assurance review memos received post-report submission. To facilitate this, State CSBG Offices may require the CAAs to provide comments when they

<sup>17</sup> Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Report (OMB No.: 0970–0492), 84 Fed. Reg. 52,506 (proposed Oct. 2, 2019).

<sup>18</sup> Submission for OMB Review; Community Services Block Grant Annual Report, 85 Fed. Reg. 3,694 (proposed Jan. 22, 2020).

<sup>19</sup> Expedited OMB Review and Public Comment: Community Services Block Grant (CSBG) Annual Report (OMB #0970–0492), 85 Fed. Reg. 73,724 (proposed Nov. 19, 2020).

<sup>20</sup> Submission for OMB Review; Community Services Block Grant (CSBG) Annual Report (OMB #0970–0492), 86 Fed. Reg. 22,056 (proposed April 26, 2021).

<sup>21</sup> 89 Fed. Reg. 29,339.

<sup>22</sup> *Id.*

<sup>23</sup> 89 Fed. Reg. at 54,005.

<sup>24</sup> 89 Fed. Reg. 29,339.

submit their CSBG Annual Reports. However, many validation flags in the data collection tools for Network use are not included on the federal data quality assurance review memos. For instance, the validation tools look for “significant variances” in data reported by CAAs year to year; if an agency reports 0 people achieved a particular outcome one year and 40 people achieved the outcome in the following year, this would be flagged for validation because it is a 100% increase. A CAA may have to provide a comment to their State CSBG Office that details why there was a significant variation even though this would not be included on the federal review memo because many of these variations are attributable to the natural fluctuation of programming, staffing, or funding year to year. As a result, CAAs and States are unnecessarily expending time and efforts addressing items that would not be called out during the federal review process. Additionally, the State CSBG Offices are required to provide comments to OCS addressing the validation flags listed on the data validation review memo, and often act as a conduit for gathering comments or updated data from CAAs. This back and forth, regardless if it occurs prior to or after submission to OCS, can cause delays in processing data at the state and federal levels (sometimes delaying the reporting at the federal level by months and even years) and creates an undue burden relative to any improvements in data quality.

**We recommend that OCS consider developing and reviewing its validations with Community Action data experts, such as the Data Task Force, to ensure validations are relevant, improve quality, and minimize burden wherever possible.** OCS can further reduce burden by setting threshold criteria to minimize insignificant validation triggers and providing options for agencies to affirm data accuracy without additional detail where it is not needed. Development of common comments, such as “change to program structure or budget” or “updates to reporting system” that CAAs can select when responding to validation flags can also decrease burden.

## **VII. What, if any, additions, revisions, or modifications to the information collection would you suggest?**

### *Training and Technical Assistance*

To ensure the successful deployment of the CSBG Annual Report, it is crucial to provide comprehensive and ongoing training and technical assistance at both the local and state levels. The complexities of the CSBG Annual Report, combined with its evolving nature, necessitate ongoing support to guarantee that the report is implemented as intended. **We recommend that OCS collaborate with Network experts to develop and deliver tailored training and technical assistance.** This partnership will ensure that the training materials and support provided are relevant, practical, and directly address the needs of Network members. The involvement of Network experts will also help in leveraging the extensive experience and knowledge within the Network, ensuring that the training and assistance are grounded in real-world application and best practices.

## VIII. Closing

On behalf of the CSBG National Partners and the Network signatories, thank you for the opportunity to offer public comments on the CSBG Annual Report. The CSBG Annual Report plays an essential role in documenting the impact of the Network and in managing and measuring its performance at the local, state, and national levels. We want to emphasize the importance of continued engagement and co-creation of solutions with the Network as OCS works on this and future clearances of the CSBG Annual Report. The collective expertise and on-the-ground experience of CAAs, State Associations, and State CSBG Offices are invaluable in crafting a reporting instrument that accurately reflects the impact of Community Action and reduces burdens. In the spirit of maximum feasible participation, public participation, and community engagement, recognizing the context and content expertise of the Network is essential to this process.

While we support moving forward with Version 2.1 to prevent data collection interruptions, we urge OCS to engage more robustly with the Network to ensure Version 3.0 reflects Network needs. OCS can take steps to reduce the burden of Version 2.1 by developing, reviewing, and streamlining its data validations with Network data experts such as the Data Task Force. OCS should also continue to prioritize training and technical assistance to ensure proper implementation and understanding of the report. We also hope that future updates to Module 3, informed by Network input and feedback, will better capture and reflect the important and ongoing work of CAAs at the community level.

**We are stronger when we work together, and we urge OCS to create ongoing spaces for collaboration to achieve our shared goals.** Thank you for considering our comments. We look forward to continued partnership and the opportunity to contribute to the development of a robust and effective CSBG Annual Report that serves the needs of the Community Action Network, OCS, and Congress.

Sincerely,

---

Denise L. Harlow, MSW, CCAP  
Chief Executive Officer  
National Community Action Partnership

---

Allison Ma'luf, Esq.  
Executive Director/General Counsel  
Community Action Program Legal Services

---

Cheryl Williams  
Executive Director  
National Association for State  
Community Service Programs

---

Barbara J. Mooney, Ed. D  
Director  
Association of Nationally Certified ROMA  
Trainers and Implementers