

Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Progress Report (Office of Management and Budget No. 0970–0492) Published in Federal Register /Vol. 89, No. 78 /Monday, April 22, 2024 /Notices

Dr. Lanikque Howard, Director
Office of Community Services (OCS), Administration for Children and Families
330 C Street SW, Washington, DC 20201

June 20, 2024

Dear Dr. Howard,

Please accept for consideration my comments related to the proposed changes to information collected using the CSBG Annual Progress Report. I am the Director of the Association of Nationally Certified ROMA Trainers (ANCRT). This association (which includes ROMA Implementers and Advocates as well as Trainers) has nearly one thousand members who have demonstrated knowledge, skills and competencies related to the performance management system known as Results Oriented Management and Accountability. These individuals work at all levels of the community action network across the country and our Board reflects that range with representatives from local Community Action Agencies, state associations and state CSBG offices.

The following are my comments, based both on my 40 years of experience in the CSBG network and also considering survey responses, focus group discussions and interviews in which I have been engaged over the past two months. ROMA professionals and ANCRT Board Members will be sending comments from their perspectives throughout the country in separate messages. The Board has approved the content of this letter.

Item 1: Clarity of information – this comment is about concern that the information collected must clearly differentiate between the services provided to individuals and families and the impact of those services. Clarity about the **change in status** is key.

While in any performance management system, there can be indicators that relate to both services and results, it is most important that these indicators are clearly understood as being different aspects of performance. The Annual Report has two sections in what is currently (in 2.0) Module 4 that are used to collect information related to the provision of services (SRV) and the achievement of results (Family National Performance Indicators, FNPIs). These have been clearly defined in prior guidance made available to all who are using this report so that what is reported in the FNPIs is about the impact of the services – clearly identifying what has changed. It is important that the language used in the FNPIs is different from the language in the SRV section.

In the proposed revisions and additions of FNPIs, this differentiation has become blurred. See below identification of the **specific items proposed to be revised or added** that are of concern and proposed changes that would improve clarity. The concern is that the revised language speaks about enrolling, connecting, completing and serving which are not outcomes. The FNPIs are to identify the impact of the services reported in SRV.

Individual/Family Level National Performance Indicators (FNPIs) proposed to be REVISED

Proposed changes all reference receipt of service instead of achievement of outcome.

Current Language	Proposed Change in Language	Suggestion for revised wording
FNPI 2a The number of children (0 to 5) who demonstrated improved emergent literacy skills.	FNPI 2a. The number of young children (0-5) <i>enrolled</i> in childcare or early childhood education services.	FNPI 2a. The number of young children (0-5) enrolled in childcare or early childhood education services who are achieving developmental milestones.
FNPI 2b The number of children (0 to 5) who demonstrated skills for school readiness.	FNPI 2b. The number of youth actively <i>connected to</i> education and skills development programs.	FNPI 2b. The number of youth actively connected to education and skills development programs who are achieving academic and/or developmental milestones.
FNPI 3a The number of individuals who achieved and maintained capacity to meet basic needs for 90 days.	FNPI 3a. The number of individuals <i>completing</i> income and asset building training.	FNPI 3a. The number of individuals completing income and asset building training, who improved knowledge and/or skills.
FNPI 4h The number of individuals with improved energy efficiency and/or energy burden reduction in their homes.	Becomes FNPI 4f. The number of individuals <i>served</i> with energy assistance or energy efficiency homes.	Retain as is

Individual/Family Level National Performance Indicators (FNPIs) proposed to be ADDED

Proposed additions reference receipt of service instead of achievement of outcome.

Proposed Language	Suggestion for revised wording
Becomes FNPI 5c. The number of individuals <i>receiving</i> reproductive services. <i>Note: this is connected to two SRV (reproductive services and maternal/child health) which would each have impacts.</i>	Number of individuals who have improved skills and/or knowledge related to reproductive health. Number of individuals who have improved skills and/or knowledge related to maternal/child health.
Becomes FNPI 5d. The number of individuals receiving wellness services.	Number of individuals who obtain or maintain wellness.
Becomes FNPI 5e. The number of older adults (age 65+) receiving home visiting services.	Retain AR 2.0 FNPI 5f: Number of older adults who maintained independent living situation
Becomes FNPI 5g. The number of adults receiving preventative oral health services.	Number of adults who maintain oral health.
Becomes FNPI 5h. The number of children receiving preventative oral health services.	Number of children who maintain oral health.

Concern: **Identifying “access” as a change in status at the family level.**

The two items identified below are of particular importance to reconsider as they include the concept of access to something (food, jobs, housing) being an outcome. The Annual Report must maintain clarity about “access.” When you drill down to the need and the actual outcome, it is not the increased access that is important at the family level – but rather having access is a community level issue. Do individuals and families have food? Jobs? Housing? That is the question, not whether they have access to those things. Just having access does not indicate a change in status. They may have access but still not take advantage of the access. Reference to access does not show the impact at the family level.

--Becomes FNPI 5b. The number of individuals with access to health coverage.

Suggested change: Number of individuals who obtained health coverage.

--Becomes FNPI 5i. The number of individuals receiving access to healthy food options.

Suggested change: Number of individuals who have healthy food. Or Number of individuals who are better able to meet food needs.

NOTE: Access is, however, an important area to report at the community level. If the agency increases access to food (such as via a food distribution program), that is a change at the community level and should be reported in that module.

Item 2: Whether the proposed **collection of information is necessary** for the proper performance measurement of Federal, State, or local agencies.

In the proposed changes, National Performance Indicators **have been removed** with the objective of reducing burden or increasing clarity. However, some items that are proposed to be removed will reduce the ability of the network to meet proper performance measurement. The items identified below are indicators that reflect important activities in which many agencies are engaged **and should be retained**.

Current Item	Suggestion for revised wording
FNPI 1b. The number of unemployed adults who obtained employment (up to a living wage).	The number of unemployed adults who obtained employment.
FNPI 1c The number of unemployed adults who obtained and maintained employment for at least 90 days (up to a living wage).	The number of employed adults who maintained employment for at least 90 days.
FNPI 2f The number of adults who demonstrated improved basic education.	The number of adults who improved basic education (reading, math) and/or English language skills.
FNPI 3d The number of individuals who increased their savings.	The number of individuals who opened or added to a savings account (or other saving instrument such as a IDA).
FNPI 3e.1 Of the above, the number of individuals who purchased a home.	The number of individuals who purchased or refinanced a home.
FNPI 5d The number of individuals who improved skills related to the adult role of parents/ caregivers.	Retain

FNPI 5f The number of seniors (65+) who maintained an independent living situation.	Retain
FNPI 5g The number of individuals with disabilities who maintained an independent living situation.	Retain

Concern: **Removal of data element regarding Income Source**

One of the data elements that allows us to clearly identify the population served is that of Income Source in Household Demographics. Knowing the percent of Community Action customers who are working, for example, can help to dispel myths about them. Knowing a large percent of an agency’s population is receiving social security income can guide decisions about the services to be provided. Suggestion: retain this data element.

Item 3: Whether the proposed **collection of information is necessary** for the proper performance measurement of Federal, State, or local agencies.

In the proposed changes, the **Community Level information is designated as “optional.”** This appears not to acknowledge the purposes of the CSBG funding legislation that includes community level goals.

(112 STAT. 2728 PUBLIC LAW 105–285—OCT. 27, 1998, 42 USC 9901. “SEC. 672. PURPOSES AND GOALS.

...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.)

Therefore, collecting information about strategies and results at this level should not be any more optional than the other sections of the report.*

Without a clear direction to recipients of CSBG funding about the importance of information to be collected at this level, the proper performance measurement related to reduction of poverty and revitalization of low-income communities cannot be achieved. Suggestion: do not label this module as optional.

*A note about the concept of “optional.” The entire report is designed as a menu of possible areas in which local agencies are engaged. Agencies report only the services and indicators that are appropriate for them to address the findings of their Community Needs Assessment – and all the other items are in effect optional as they are not appropriate to be included. If an agency is not engaged in community level work, for them the Community Level module *would* be optional. But if they ARE engaged in community level work, the collection of information about that work is necessary, not optional.

Item 4: Whether the proposed **collection of information is necessary** for the proper performance measurement of Federal, State, or local agencies.

Because of the foundational principle that each local CAA will be responsive to the needs assessed that are unique to the community it serves, there will be impacts that are not a part of the standard set of Indicators identified in the FNPIs. Currently an agency with an impact that is not identified can add that to the FNPI report using the

indicators labeled as “z” in each section. This option is being proposed for elimination in 3.0. Loss of this option will limit the ability of the network to identify innovative changes that may be the seeds of new approaches and new advancements to be identified. Suggestion: retain the “z” indicators.

Item 5: Does the information to be collected produce significant burden?

A factor to weigh about information collection related to the Annual Report is that burden is limited by the understanding that agencies are only reporting on the items that reflect their actual work, not the full menu of items included in the report. Reducing the total number of items in the report may not impact in any way the number of items that an individual agency is including in their report, so burden may not be reduced at all.

While the addition of a Transportation domain to the list of possible domains for which information will be collected is welcomed, the elevation of this service will pose a significant burden. The SRV section asks agencies to collect and provide information on unduplicated individuals served. Agencies that provide services without the collection of demographic data at each encounter will be challenged. If “riders” use the service multiple times, the task of deduplication can be burdensome and in some cases impossible. I do not have a suggestion to address this burden at this time and feel this will take some further consideration to solve.

****Note:** it is not clear why the Transportation domain does not have any Indicators. Is it an attempt to reduce burden? In the course of providing any service, the associated outcomes are identified, so this it is not an additional burden beyond collecting information about the service to also identify the outcome. While in some cases providing transportation services may be identified as “concrete support,” in many cases the move from not having transportation to having transportation produces an impact on a family’s ability to meet their basic needs and their sense of independence. When a family “obtains adequate transportation” that is a change in status, similar to when a family “obtains housing,” and should have NPIs associated with the services. Not having any indicators associated with an entire domain sends a message that concrete services do not have a purpose – when in fact they can be part of an approach that helps avoid crisis or supports family stability (which are outcomes!).

Item 6: Clarity of information – this is a series of comments regarding the **SRV items** proposed. I have included my concerns in each item and a suggested change.

1 – Question the wording of revision SRV 2n. The number of individuals attending basic education classes (e.g.: financial literacy).

This should say “adults,” (not “individuals”) as basic education for children is captured elsewhere. Financial capacity training is captured SRV 3a so referring to it here is confusing (could lead to duplication) and not appropriate as financial literacy is not considered to be “basic”. Suggested change: SRV 2n. The number of adults attending basic education classes (e.g.: reading, writing, math, English language).

2 - Question the removal of SRV 2w Parenting Supports. This is an important aspect of many programs provided by CAAs (Head Start, 2 Generation). If it must be included with another item it might be added to the item moved from 5ll. Becomes SRV 2q. The

number of adults receiving life skills and coaching services. While “parenting supports” are much broader than “parenting skills training,” and parenting skills are not routinely included with life skills, it could make sense to include them together. Also add the word “training” so this SRV item is not confused with the outcome of gaining skills.

Suggested change: SRV 2q. The number of adults receiving life skills (including parenting skills) training, coaching and support services.

3 – Removal of SRV7a – Case Management. Suggestion: Retain this item. Generic “case management” service are provided in “2 Generation” or “whole family” or “bundled services” approaches where services cover more than one domain area. There is evidence that these approaches involving multiple domains are effective in achieving improved outcomes for individuals and families, so the loss of this item will reduce the ability of the network to demonstrate how their activities produce results.

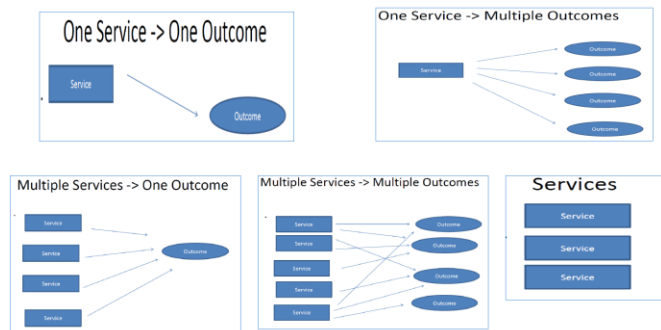
4 - Removal of SRV7c – Referrals. Suggestion: retain this item. If removed, suggest guidance be provided for where referrals are to be counted. If they are to be counted the same as services actually provided by the agency itself, this may cause confusion, but the loss of referral information will reduce the agency’s ability to document its work.

5 - Assure consistency in identifying the “unit” – there are “individual” and “adult” and “children” and “youth” and those are all appropriate for the different kinds of services. But there is both “older adults” and “seniors” – use of either one of these terms throughout would reduce confusion. Two items say “people”- should be “individuals.” One item says “families” and one says “households” – are these intended to have two different meanings or could one word be used for both? And should these actually be “individuals” to remain consistent in what is being counted in this section? Finally two items identify the things that are distributed not the people who receive them. They stand out as different from all the rest: SRV 5t. The number of hygiene kits or supplies and SRV 5u. The number of diapers or diapering supplies. These should say the number of individuals (or families/households) who received kits, supplies, diapers.

Item 7: Clarity of information - The **Services to Outcome Plan** must include recognition of a wider interpretation of the relationship between services and outcomes. In its current form, it implies that there is a one to one relationship between service and outcome.

The proposed chart of relationships can be very useful to the network to help understand some of the more common ways that services produce outcomes, and may improve standardized approaches to connecting data elements. However, we cannot devalue the understanding of situations presented by families in need of assistance. Most of these have problems in several domains, and often multiple services are required to achieve a single outcome. Or a single service (such as case management) can produce multiple outcomes.

The graphic below shows the range of relationships we know exist in the community action network.



(Introduction to ROMA, p94)

CONCLUDING REMARKS: As you will be receiving numerous comments that you will have to process quickly, I have limited mine to those I feel are most critical for your review.

We understand the primary purpose of the Annual Report, but the role of this report is much more than as the tool to meet regulation. This report serves as a guide to the 1000 CAAs and CSBG state offices – and it (if intentionally or unintentionally) sends a message about the value of the items included. It is useful to have the most common items identified for reporting in a standard format. I am proud that our network has established a set of NPIs (which many other human service networks do not have). To assure they are meaningful, however, OCS must negate the perception that things that are not included are not important or not eligible for CSBG support.

OCS has always been mindful of the need for balancing a desire to limit information collection and also to make sure that there is sufficient information that will tell the full story of the impact of CSBG funding. We expect that with input from all levels of the CSBG network, this balancing act will be productive for the various purposes of the Annual Report. If you decide, based on volume of responses and concerns, to move forward with clearance for 2.1 and delay submitting 3.0 until you have a chance for further discussion and revision, you can count on us to be available to help and participate as you require for comprehensive engagement of the network.

The need for accurate and timely accountability for the on-going work and impact, via an Annual Report that represents the impact of CSBG, is critical. Regardless of the changes that are made, we know there will be a need for training, guidance and other supports to enable the network to meet expectations. The ROMA professionals look forward to working together with OCS and our national partners to assure the best possible performance measurement and performance management systems are available to support the implementation of high quality services for families and strategies for community work that produce results at all levels.

Sincerely,

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