

<p><i>This report contains the Module 2 Content for the following comments:  1,2,3,4,6,8,9,10,11,12,13,14,16,17,18,19,20,21,22,23,25,29,30,31,32,33,34,35,36,37,38,39,40  ,41,42,43,45,46,47,48,49,50,53,55,56,58,59,60,61,63,64,65,67,68,71,72,73,74,75,77,78,79,80  ,81,82,83,84,85,86,87,89,91,94,96,98,100,101,102,103,104,106,107,108,109,110,111,113,114,115,116,118,119,120,121,123,124,125,126,129,130,131,132,133</i></p>
<p><b>Comment 1 ( Arizona Department Of Economic Security, Division Of Aging And Adult Services, Community Action Programs And Services (Daas/Caps) ; State in AZ)</b></p>
<p>Module 2: Module 2 – Agency Expenditures, Capacity, and Resources: (pages 23-27)</p> <p>The State CSBG Office is interested in knowing the mechanism by which this data will be collected from the Network, and over which period, FFY or SFY? Will there be Excel spreadsheet forms, and/or a database (Access) type of tool for State reporting? Will these elements be entered into OLDC also? The concern on the part of the Network is the volume of manual data collection required on the part of the CAAs, and if technical assistance resources will be available to the State and the CAAs. The State CSBG Office finds the data elements of Module 2 largely satisfactory and self-explanatory.</p>
<p><b>Comment 2 ( Clarity, Impact And Performance Project Steering Committee; RPIC in ID)</b></p>
<p>Module 2: Module 2 – Agency Expenditures, Capacity, and Resources: (pages 23-27)</p> <p>Module 2, Section B: (page # 25)</p> <p>Need more clarity on the language “only report partnerships here that contribute to the agency capacity”, Is this an MOU level partnership or agencies who are partners at any level?</p>
<p><b>Comment 3 ( Hill Country Community Action Association, Inc. ; Eligible Entity/Local Agency in TX)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 4 ( Sacramento Employment And Training Agency (Seta) ; Other/Unknown in CA)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 6 (Action For Boston Community Development Inc.; Other/Unknown in MA)</b></p>

Module 2: No Comment
<b>Comment 8 (Ashtabula County Community Action Agency; Eligible Entity/Local Agency in OH)</b>
Module 2: No Comment
<b>Comment 9 (Association Of Nationally Certified Roma Trainers ; Eligible Entity/Local Agency in N/A)</b>
<p>Module 2: We support the expanded agency capacity items in this module, including the use of CSBG funding for this purpose and a way to identify the capacity activities that are supported in this way. This module section is the place where we see the importance of and the support for building and maintaining Agency Capacity that is needed as the foundation of all of the network's outcomes. We like the additional elements of staff credentialing, but want to see the family worker credentialing returned to the list (is in current IS reporting) as this is an area where we need to see skills and attitude development for our direct service workers.</p> <p>We question the placement of administrative expenditures in Module 2 Section A. We have heard from our fiscal colleagues that CSBG administrative expenditures should not be included in the other domain areas of report and then taken out to be reported separately. It has been stated that either an expenditure is related to a service domain or it is administration in nature (according to OCS 1M 37). This was the proposal in the discussions over the past two years, but in the report as it is presented for comment administration dollars are first included and then separated which is how this has been reported in the IS. This requires additional clarity.</p>
<b>Comment 10 (Blue Valley Community Action Partnership; Other/Unknown in NB)</b>
<p>Module 2: I am concerned how as a Community Action Partnership at the local level in Nebraska, we will meet some of the reporting based on expenditures by function, which no federal source separates out for budget purposes. No line items exist on most federal budget pages for planning, coordination, administration, etc. In fact most administrative costs are tied to indirect costs for the sole purpose that these areas are difficult to track.</p>
<b>Comment 11 (California Community Action Partnership Association; Other/Unknown in CA)</b>
Module 2: No Comment
<b>Comment 12 (Cap Service ; Other/Unknown in WI)</b>
Module 2: Agency Expenditures, Capacity and Resources - Module 2 Pages 23-27: The current IS

survey includes 300+ data elements to report. The proposed CSBG Annual Report includes more than 1,000. This increased burden of reporting comes with no new resources. The agency's estimated time burden of 242 hours per sub-grantee (local Community Action Agency) is significantly under estimated.

Based on our calculations, the burden to our local agency would be closer to three times that (in part due to CAP's large platform of services and because of the inconsistent data elements across programs and the need to recapture what is needed for CSBG serve about 2,500 households per year (over \$15,000), which represents over 4% of our CSBG allocation. The additional data points and the proposed community indicators we believe will result in costs of \$40,225 without inclusion of collective impact reporting or any new software systems to manage this.

Several of the elements to be collected as described are not available in smaller geographic areas usually targeted by local agencies in their community work and if created by local agencies, lose validity. CAP Services' footprint is predominantly rural and as such, easily finding base data with which to compare or track changes is already challenging.

In addition, our agency lacks a cost-effective management information systems and the staff capacity to create and maintain it to disaggregate this type of data from its overall customer database, or struggle to integrate the required data given our use of multiple (and sometimes incompatible) reporting systems as I'd described earlier. Our Board would stand opposed to investing precious resources in management of data over delivery of services to meet the needs identified in our needs survey. Lacking a definition of "new" clients being provided for review, our network will be unable to implement this report consistently. Defining an individual or family is challenging when they may receive different services over a number of years.

I would note the reference to an online automated system may benefit State Lead Agencies but will not likely CAP Services, Inc. or our peers in the State and Nation. This will still require systems that track customers, services, outcomes, and given the requirement of many funding sources (including other federal Department of Health and Human Services funding) requires additional and sometime separate data collection systems as I described earlier. We have assessed available systems and none are designed to capture all of our current reporting obligations. CAP Services' Board is hard pressed to invest in something less than workable or the staff resources for even more data re-collection or sorting that brings no additional value to our achievement of our mission.

Module 2 Section B: (page # 25) 1. Hours of Agency Capacity Building — As commented by our state monitor, this will be very difficult to provide an accurate count of all hours spent in capacity building. Providing hours spent in training as in the current IS Survey is relatively straightforward, but counting all of the hour's staff and board members spend in "planning and assessment" activities would be much more complicated and time consuming. For some staff members, that could be a majority of their work hours and for board members, much of their time in regular board meetings and committee meetings could be considered capacity building activities. This would also be very much dependent on how agencies interpret the terms "planning and assessment". In addition to the burden of tracking these hours, the practical utility of this information is questionable. Given the potential for very large numbers, that could lead one to question the validity of the data

**Comment 13 (Cattaraugus Community Action, Inc.; Eligible Entity/Local Agency in NY)**

Module 2: No Comment

<b>Comment 14 (Center For Community Future ; Other/Unknown in N/A)</b>
Module 2: No Comment
<b>Comment 16 (Central Missouri Community Action ; Other/Unknown in MO)</b>
Module 2: Module 2 – Agency Expenditures, Capacity, and Resources: (pages 23-27)
Module 2, Section B: (page # 25)
<ul style="list-style-type: none"> <li>• If community partnerships are no longer a part of the NPIs tracked on a regular basis, there is concern about this information getting lost as agencies focus more on NPIs that are required to be tracked quarterly versus being tracked annually. We feel this information is important</li> </ul>
Module 2, Section C: (page # 26-27)
<ul style="list-style-type: none"> <li>• There is nowhere to report how CSBG dollars are used to support or advance the capacity of the agency and other programs.</li> </ul>
<b>Comment 17 (Central Nebraska Community Action Partnership; Other/Unknown in NE)</b>
Module 2: No Comment
<b>Comment 18 (City Of Austin Health And Human Services ; State in TX)</b>
Module 2: No Comment
<b>Comment 19 (Colorado Community Action Association; State Association in CO)</b>
Module 2: Agency Expenditures, Capacity, and Resources: (pages 23-27)
Module 2, Section A: (page # 24)
<ul style="list-style-type: none"> <li>· Table 1 – “Administration” should be a category in Table 1, not as a secondary question below the table. Additionally, the secondary question makes no sense as “administration” in CSBG cannot be directly tied to an activity or domain (and thus could not be contained in another domain in the Table 1 above). When asked why this was the case, NASCSP responded that if “Administration” was a category in Table 1, the figure would be too big and would not look good on the network, which is not a good reason to retain a reporting measure as currently stated. Out of all of the changes to Module 2, Section</li> </ul>

<p>A, removing this secondary question regarding administration and making administration its own domain in Table 1 was my greatest suggestion and it was not incorporated.</p> <p>Module 2, Section B: (page # 25)</p> <ul style="list-style-type: none"><li>· Item 3 – Add “on staff” to the end of each of these certifications so that agencies understand that these are certifications held by their internal staff and not a partner agency (such as the State Association or a subcontractor).</li><li>· Item 4 – Should this be partnerships “maintained or developed”? As currently stated, only partnerships developed during the reporting period would be counted, not all partnerships in the community.</li></ul> <p>Module 2, Section C: (page # 26-27) N/A</p>
<b>Comment 20 (Colorado Department Of Local Affairs ; Other/Unknown in CO)</b>
Module 2: No Comments
<b>Comment 21 (Combined Community Action ; Eligible Entity/Local Agency in TX)</b>
Module 2: No Comment
<b>Comment 22 (Community Action Agency ; Other/Unknown in NE)</b>
<p>Module 2: Module 2, Section A: (page # 24)</p> <p>There will difficulty in separating out the CSBG funds used for Agency Capacity Building, as several people are involved but only a part of their work. How to track this without being cumbersome financial reporting is the concern.</p> <p>Module 2, Section B: (page # 25)</p> <p>This same concern lies with tracking the hours that board members, agency staff and volunteer staff spend on capacity building activities.</p> <p>Module 2, Section C: (page # 26-27)</p> <p>There is no problem with this. Take straight from our audit!!!!</p>
<b>Comment 23 (Community Action Agency Of Beaver County ; Eligible Entity/Local Agency in PA)</b>

<p>Module 2: I am concerned how as a Community Action Partnership at the local level in Nebraska, we will meet some of the reporting based on expenditures by function, which no federal source separates out for budget purposes. No line items exist on most federal budget pages for planning, coordination, administration, etc. In fact most administrative costs are tied to indirect costs for the sole purpose that these areas are difficult to track.</p>
<p><b>Comment 25 (Community Action Agency Of North Alabama ; Other/Unknown in AL)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 29 (Community Action Agency Of Southern New Mexico; State Association in NM)</b></p>
<p>No Module 2 Content for this comment.</p>
<p><b>Comment 30 (Community Action Association ; State Association in NM)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 31 (Community Action Commission Of Erie, Huron, &amp; Richland Counties ; Eligible Entity/Local Agency in N/A)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 32 (Community Action Committee Of Victoria, Texas; Eligible Entity/Local Agency in TX)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 33 (Community Action Council ; Eligible Entity/Local Agency in KY)</b></p>
<p>Module 2: The Council has systems in place that will allow the organization to easily adopt this report format within the existing system. It would be most advantageous for the local community action agencies to have access to the database to ensure validity of the data.</p>
<p><b>Comment 34 (Community Action Council Of Lexington-Fayette, Bourbon, Harrison And Nicholas Counties ; Eligible Entity/Local Agency in KY)</b></p>

Entire Module 2

<p>Module 2: Module 2 – Agency Expenditures, Capacity, and Resources: (pages 23-27)</p> <p>The Council has systems in place that will allow the organization to easily adopt this report format within the existing system. It would be most advantageous for the local community action agencies to have access to the database to ensure validity of the data.</p>
<p><b>Comment 35 (Community Action Council Of Portage County; Other/Unknown in OH)</b></p>
<p>Module 2: NO Comment</p>
<p><b>Comment 36 (Community Action Partnership ; National Partner in DC)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 37 (Community Action Partnership Of Kern ; Other/Unknown in CA)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 38 (Community Action Partnership Of Orange County; Eligible Entity/Local Agency in CA)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 39 (Community Action Partnership Of Riverside County; Eligible Entity/Local Agency in CA)</b></p>
<p>Module 2: Section A: Table 2 – Details on Agency Capacity Building (page # 24)</p> <p>“Community Needs Assessment” does not appear to be consistent, as an option to choose in Table 2 – Details on Agency Capacity Building Activities, with either the information requested in Module 2, Section B: Local Agency Capacity Building or with the categories listed for the Organizational Standards (where “Community Needs Assessment” is referenced under the Categories of Consumer Input and Involvement, Community Engagement, Community Assessment, or is foundational for the Community Action Plan and Strategic Plan. Therefore, it would more naturally fall under the option of “Strategic Planning,” than to be an option of its own.</p>
<p><b>Comment 40 (Community Action Partnership Of San Luis Obispo County, Inc.; Eligible Entity/Local Agency in CA)</b></p>
<p>Module 2: No Comment</p>

<b>Comment 41 (Community Action Planning Council Of Jefferson County, Inc.; Eligible Entity/Local Agency in NY)</b>
Module 2: – Agency Expenditures, Capacity, and Resources: (pages 23-27)
Module 2, Section A: (page # 24)
• No Comments
Module 2, Section B: (page # 25)
• No Comments
Module 2, Section C: (page # 26-27)
• No Comments
<b>Comment 42 (Community Action Program Associations For Community Action Agencies; State Association in WI)</b>
Module 2: No Comment
<b>Comment 43 (Community Renewal Team ; Eligible Entity/Local Agency in CT)</b>
Module 2: No Comments
<b>Comment 45 (Del Norte Senior Center, Inc.; Eligible Entity/Local Agency in CA)</b>
Module 2: Module 2 – Agency Expenditures, Capacity, and Resources: (pages 23-27)
Module 2, Section B: (page # 25)
This information has previously been reported as part of the NPI reporting. There does not appear to be a valid reason for requiring a separate report for this information.
<b>Comment 46 (Delaware Opportunities Inc.; Eligible Entity/Local Agency in DE)</b>
Module 2: No Comment
<b>Comment 47 (Department Of Community Service And Development ; State in CA)</b>



<p>Module 2: The Agency Expenditures, Capacity and Resources module is similar to what is currently reported under the CSBG IS. This continuity in reporting is appreciated. Also, streamlining the reporting to include agency capacity under this section will assist in viewing agency administrative contributions at a glance. This will be helpful and will reduce the amount of crosswalk between fiscal and programmatic elements currently provided in the annual CSBG IS</p>
<p><b>Comment 48 (Department Of Housing And Community Development ; State in MA)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 49 (Department Of Human Services ; State in AR)</b></p>
<p>Module 2: Module 2 – Agency Expenditures, Capacity, and Resources: (pages 23-27)</p> <p>Further conversation is recommended on where and how CSBG administrative expenditures are reported to align with Network feedback and OCS guidance in the form of IM 37.</p>
<p><b>Comment 50 (Department Of Social Services Office Of Community Services ; State in CT)</b></p>
<p>Module 2: Module 2 – Agency Expenditures, Capacity, and Resources: (pages 23-27)</p> <p>Module 2, Section A: (page # 24)</p> <ul style="list-style-type: none"> <li>o See reference to Table 2 in inquiry below at Module 2, Section B.4.</li> </ul> <p>Module 2, Section B: (page # 25)</p> <ul style="list-style-type: none"> <li>o “1.a Hours of Board Members in capacity building activities” – This may be challenging or burdensome to some CAAs as staff responsible for tracking Board Member volunteer hours may not have the facility to determine when an individual’s time is specifically focused on capacity building activities. If such an activity were to occur during a regular Board meeting, it may be complicated to separate and calculate the timing (e.g. Planning Committee Member presents report/minutes to full Board regarding activities/update – Is the Committee Member conducting a capacity building activity by informing the whole Board about progress? Is the whole Board participating due to their receipt of information and discussion/feedback that follows?).</li> <li>o “1.b Hours of Agency Staff in capacity building activities” – This may be burdensome to staff especially those that are paid through multiple funding streams. Staff in this situation already must track</li> </ul>

their time to be compliant with funding requirements (percentages of time devoted to certain activities must align with payroll allocations). Adding “capacity building activities” into existing tracking systems may not be feasible or practical. It is a layer that may cross over some funding streams or parts of funding streams. It may be more practical to report/estimate the number of FTE participating in “capacity building activities” throughout the year (if specific activities/projects are assigned to personnel).

O “3. Staff Development and Certification Attainment” – It is not clear if this section is asking for existing information or information limited to newly attained status for the year. For example, at “a. Number of Nationally Certified ROMA Trainers”, is the CAA meant to enter the number of existing ROMA Trainers at the agency whether they received their national certification in the reporting year or prior? Or is the CAA meant to only report those that attained their certification within the reporting year?

O “4. Partnerships Developed to Expand Agency Capacity...only report partnerships that contribute to the agency’s capacity” – As Module 2, Section A Table 2 defines Capacity Building as Community Needs Assessment, Data Management, Strategic Planning, Training and Technical Assistance and Other, it may be presumed that CAAs will list all partners and not make a differentiation between capacity building and non-capacity building. It is expected that a CAA will collect and utilize information to assess community needs through all of its partnerships (part of ROMA cycle). CAAs would be hesitant to admit a partnership existed without an understanding that useful data would be a component of such a relationship.

O In addition, does the inclusion of the word “developed” in the heading suggest that the report should only include those partnerships initiated within the reporting year or is the CAA supposed to report on all existing partners?

Module 2, Section C: (page # 26-27)

o “Federal Resources Allocated (Other than CSBG)” – There is a possibility of duplicative reporting in this section if it is not made clear which entity shall report on dollars received. For example, if one CAA receives federal money and subcontracts to another CAA in the same State, which entity reports the resource allocation? Grantee or sub-grantee?

**Comment 53 (Division Of Sate Service ; State in DE)**

Module 2: No Comment

**Comment 55 (Florida Department Of Economic Opportunity ; Other/Unknown in FL)**

Module 2: \* Changes will take place mostly on a state level, but we need to remember that changes made at that level could eventually affect us at the local level. Module 2 is information that we already gather and provide as the total amount of

\* CSBG funding expended during the reporting period based on the various domains.

<p>* Allowing state agencies to only provide a 100% or fail to local agencies for CSBG Organizational Standards doesn't provide a true picture of the agencies standards. States should be able allowed to report how many agencies met 100%, 90%, 80%, etc. in order to truly reflect a state's performance. Also, it would allow for focused technical assistance on agencies with the most need.</p>
<p><b>Comment 56 (Four Square Community Action ; Other/Unknown in NC)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 58 (Greater Bergen Community Action; Eligible Entity/Local Agency in NJ)</b></p>
<p>Module 2: Module 2 – Agency Expenditures, Capacity, and Resources: (pages 23-27)</p> <p>Module 2, Section A: (page # 24)</p> <p>Adding Agency Capacity Building to the list of CSBG expenditures not only underlines the importance of these activities, but also creates a funding stream that wasn't available before. Great change. The Annual Report should also be listed as an activity.</p> <p>Module 2, Section B: (page # 25)</p> <p>Increasing the list of Staff Development and Certification Attainment provides a better picture of the steps agencies are taking to provide opportunities for staff to grow.</p>
<p><b>Comment 59 (Greater Bergen Community Action ; Eligible Entity/Local Agency in NJ)</b></p>
<p>Section A: (page # 24)</p> <p>Adding Agency Capacity Building to the list of CSBG expenditures not only underlines the importance of these activities, but also creates a funding stream that wasn't available before. Great change. The Annual Report should also be listed as an activity.</p> <p>Module 2, Section B: (page # 25)</p> <p>Increasing the list of Staff Development and Certification Attainment provides a better picture of the steps agencies are taking to provide opportunities for staff to grow.</p>
<p><b>Comment 60 (Hinds County Human Resources Agency ; Other/Unknown in MS)</b></p>

Module 2: No Comments
<b>Comment 61 (Illinois Association Community Action Agency ; Other/Unknown in IL)</b>
Module 2: No Comment
<b>Comment 63 (Indiana Housing And Community Development Authority ; State in ID)</b>
Module 2: No Comment
<b>Comment 64 (Iowa Community Action Association; Eligible Entity/Local Agency in IA)</b>
Module 2: No Comment
<b>Comment 65 (Kceoc Community Action Partnership; Eligible Entity/Local Agency in KY)</b>
Module 2: Agency Expenditures, Capacity, and Resources: (pages 23-27)
Module 2, Section A: (page # 24) See Section B comments
Module 2, Section B: (page # 25)
*Additional staff time to now keep up with staff hours in planning & assessment (In addition to training). I'm not sure why this matters. What does it matter how much time we spend completing our community needs assessment or strategic plan? What matters is that we do complete it. Agencies function at different capacities. If we were struggling in these areas I could see this as a recommendation to review to help improve, but not as ongoing everyday reporting criteria. Again, this is process, not results.
*Q4-How is agency capacity defined in terms of partnerships? Why have a partner if it not improving your ability to meet agency goals or programmatic requirements?
<b>Comment 67 (Lorain County Community Action Agency ; Other/Unknown in OH)</b>
Module 2: No Comment
<b>Comment 68 (Louisville Metro Community Service ; State in KY)</b>

Entire Module 2

Module 2: Module 2 – Agency Expenditures, Capacity, and Resources: (pages 23-27)
Module 2, Section A: (page # 24) · “Services supporting multiple domains” and “Agency Capacity Building” are welcomed additions to the traditional service categories.
Module 2, Section B: (page # 25)  · Building Performance Institute professionals are no longer a requirement for Weatherization. As a result, this data element seems unnecessary.
<b>Comment 71 (Maine Community Action Association ; Other/Unknown in NE)</b>
Module 2: No Comment
<b>Comment 72 (Massachusetts Community Action Agency Planners’ Group; State Association in MA)</b>
Module 2: No Comment
<b>Comment 73 (Maui Economic Opportunity Inc. ; Other/Unknown in HI)</b>
Module 2: No Comment
<b>Comment 74 (Merced County Community Action Agency ; Other/Unknown in CA)</b>
Module 2: No Comment
<b>Comment 75 (Michigan Community Action ; Eligible Entity/Local Agency in MI)</b>
Module 2: Module 2 - Agency Expenditures, Capacity, and Resources: (pages 23-27)  • The current reporting is already significant and should remain unmodified.
<b>Comment 77 (Minnesota Valley Action Council, Inc. ; Eligible Entity/Local Agency in MN)</b>
Module 2: Module 2 – Agency Expenditures, Capacity, and Resources: (pages 23-27)

<p>Module 2, Section B: (page # 25) Recommend not only reporting how many, but how many added in report period to see how agency capacity is growing / changing.</p>
<p><b>Comment 78 (Missouri agency Inc. ; Other/Unknown in MO)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 79 (Missouri Community Action Network (Can); State Association in MI)</b></p>
<p>Module 2: Module 2 – Agency Expenditures, Capacity, and Resources: (pages 23-27)</p> <p>Module 2, Section B: (page # 25)</p> <ul style="list-style-type: none"> <li>· If community partnerships are no longer a part of the NPIs tracked on a regular basis, there is concern that this information will be lost as agencies focus more on NPIs that are required to be tracked quarterly versus being tracked annually. We feel this information is important.</li> </ul> <p>Module 2, Section C: (page # 26-27)</p> <ul style="list-style-type: none"> <li>· There is nowhere to report how CSBG dollars are used to support or advance the capacity of the agency and other programs.</li> </ul>
<p><b>Comment 80 (Montgomery County Community Action Development Commission; Other/Unknown in PA)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 81 (Multi-Service Center (MSC) ; Eligible Entity/Local Agency in WA)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 82 (National Association For State Community Service Program ; Other/Unknown in N/A)</b></p>
<p>Module 2: a. Section A, CSBG Expenditures: NASCSP recommends further conversation on where and how CSBG administrative expenditures are reported to align with CSBG Network feedback and OCS guidance in the form of IM 37.</p> <p>Module 2 – Agency Expenditures, Capacity, and Resources</p> <p>NASCSP supports the reorganization and expansion of Module 2. Sections A and B were updated and</p>

<p>modified to better capture the agencies’ investments using CSBG funds and other leveraged resources to provide effective services and strategies, and support quality performance evaluation. During the Initial Feedback Period, Module 2, Section A, Table 1, contained the Administrative portion of CSBG funds expended by the CAA within the larger table of CSBG Expenditures. Data collected during this Initial Feedback Period showed a high level of support for the inclusion of administrative dollars within Table 1. NASCSP recommends further conversation on where and how CSBG administrative expenditures are reported to align with CSBG Network feedback and OCS guidance in the form of IM 37.</p>
<p><b>Comment 83 (National Community Action Foundation ; Eligible Entity/Local Agency in N/A)</b></p>
<p>No Module 2 Content for this comment.</p>
<p><b>Comment 84 (National Community Partnership ; Other/Unknown in ND)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 85 (Nek-Cap, Inc. (Northeast Kansas Community Action Agency); Eligible Entity/Local Agency in KS)</b></p>
<p>Module 2: – Agency Expenditures, Capacity, and Resources:</p> <p>Data elements in Module 2 Sections A-C provide clarity, focus and the prospect for improving agency capacity and resources. The agency currently collects several of the data elements and has the capacity to utilize existing CAP 60 database system to collect other data elements indicated. Data elements demonstrate the opportunity for increasing funding and building enhanced partnerships. The data elements do not include capacity building of the agency through advocacy and public policy endeavors, unless those activities are to be reported under other.</p>
<p><b>Comment 86 (New England Community Action Partnership (NECAP) ; State Association in CT)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 87 (New York Department Of Youth And Community Development ; State in NY)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 89 (Ninth District Opportunity, Inc.; Eligible Entity/Local Agency in GA)</b></p>
<p>Section A: (page # 24)</p>

Entire Module 2

<p>Financial categories should match service/outcome categories exactly so that agencies are able to easily make a connection between what is provided and what is expended. From the perspective of a planner and data analyst, this absolutely imperative! You MUST be able to easily draw the line for every service/outcome.</p> <p>Module 2, Section B:</p> <p>As Head Start data is expected to be included in the report, staff certifications for this program should be listed under question 3. This is especially true of those required in the PIR.</p> <p>Module 2, Section C:</p> <p>This section should allow for the documentation of leveraged dollars for client services (not donated to the agency, but paid at the request of the agency through referrals and other networking activities).</p>
<b>Comment 91 (North Dakota Community Action ; State Association in ND)</b>
Module 2: No Comment
<b>Comment 94 (Northeast Kansas Community Action Agency; Eligible Entity/Local Agency in KS)</b>
Module 2: Module 2 – Agency Expenditures, Capacity, and Resources:  Data elements in Module 2 Sections A-C provide clarity, focus and the prospect for improving agency capacity and resources. The agency currently collects several of the data elements and has the capacity to utilize existing CAP 60 database system to collect other data elements indicated. Data elements demonstrate the opportunity for increasing funding and building enhanced partnerships. The data elements do not include capacity building of the agency through advocacy and public policy endeavors, unless those activities are to be reported under other.
<b>Comment 96 (Northern Tier Community Action Corp. ; Eligible Entity/Local Agency in PA)</b>
Module 2: No Comment
<b>Comment 98 (NORWESCAP; Eligible Entity/Local Agency in NJ)</b>
Module 2: No Comment
<b>Comment 100 (Nothing Compares; Other/Unknown in NC)</b>
Module 2: Module 2 Agency Expenditures, Capacity and Resources  Module 2, Section A: (page # 24)



<p>The current proposal does not include a national goal for agency capacity. Specifications of expenditures and activities surrounding agency capacity building as indicated in Table I and Table 2 support the need for a national goal regarding agency capacity.</p> <p>Module 2, Section B: (page # 25)</p> <p>The current proposal does not include a national goal for agency capacity. Specifications of activities surrounding agency capacity building as indicated Items 1, 2, 3 and 4 supports the need for a national goal regarding agency capacity.</p>
<p><b>Comment 101 (Ohio Association Of Community Action Agencies; Other/Unknown in OH)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 102 (Opportunities For Otsego, Inc. ; Other/Unknown in NY)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 103 (Oregon Housing And Community Services ; Other/Unknown in OR)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 104 (People Incorporated Of Virginia; Other/Unknown in VA)</b></p>
<p>Module 2: No comment</p>
<p><b>Comment 106 (Project Bravo; Eligible Entity/Local Agency in TX)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 107 (Pueblo County Housing And Human Services; Other/Unknown in CO)</b></p>
<p>Module 2: Module 2: Agency Expenditures, Capacity, and Resources / No Comments</p> <p>1. Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility</p>

2. The accuracy of the agency’s estimate of the burden of the proposed collection of information
3. The quality, utility, and clarity of the information to be collected; and
4. Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

**Comment 108 (Redwood Community Action Agency ; Eligible Entity/Local Agency in CA)**

Module 2: Module 2 —Section B: Capacity Building —

The first part of this Section B (#1 and 4) requires reporting on capacity building activities for Board, staff and volunteers as well as partnerships specific to this activity which is currently not tracked. This will present more of a burden for information collection than is anticipated in the proposed rule. The collection of this information is not necessary for the proper performance of the functions of the agency services and will unnecessarily generate increased reporting and staff costs without any discernable benefit.

**Comment 109 (Sa Howell, LLC ; Other/Unknown in GA)**

Module 2: Module 1.

State offices should have the option to report multiple benchmarks concerning the achievement of OS compliance to demonstrate progress over time rather than insinuating failure for those not performing at a rate of 100%.

Many state employees are not qualified to provide ROMA oversight, technical support, and monitoring. State offices should be held accountable for access to a ROMA professional (NCRT, NCRI, or Master Trainer) and document regular participation in ROMA training, along with agencies.

Module 1, Section B

This section requires states to demonstrate an understanding of ROMA. States will more than likely be required to hire better qualified staff (data analysts) or contract these activities out. This is expected to result in a strong, more productive network along with more accurate data on a national level.

Module 1, Question E3a is especially important, as some states have been holding allocations until late in the Fiscal year, making it difficult for agencies to spend within appropriate timelines. Some states have even gone so far as to modify allocations without notifying agencies and the refusing to provide an explanation of the changes. This level of accountability is absolutely imperative to the proper operation of the network.

Module 2, Section A

<p>Financial categories MUST match service/outcome categories EXACTLY so that agencies are able to easily make a connection between the services provided and the monies expended. If no other changes are made to the document, this MUST!!</p> <p>Module 2, Section B</p> <p>As Head Start data is expected to be included in the report, staff certifications for this program should be listed under question 3. This is especially true for those documented in the PIR.</p> <p>Module 2, Section C</p> <p>This section should allow for the documentation of leveraged dollars for client services (not donated to the agency, but paid at the request of the agency through referrals and other networking activities) and to include matching funds. If private sector resources under 22F allows for collecting these dollars, it should be modified for clarification. As no other indicator now includes a place to capture this data, this is absolutely imperative to show the importance of the network in the local community and the scope of dollars leveraged on behalf of customers.</p>
<p><b>Comment 110 (SEMCAC; Eligible Entity/Local Agency in MN)</b></p>
<p>Section A: (page # 24) · No Comments</p> <p>Module 2, Section B: (page # 25) · No Comments</p> <p>Module 2, Section C: (page # 26-27) · No Comments</p>
<p><b>Comment 111 (South Plain Community Action Association ; State Association in TX)</b></p>
<p>Module 2: No Comment</p>
<p><b>Comment 113 (Southern New Hampshire Services ; Eligible Entity/Local Agency in NH)</b></p>
<p>Module 2: Module 2 – Agency Expenditures, Capacity, and Resources: (pages 23-27)</p> <p>Module 2, Section B: (page # 25)</p> <p>Does “partnership” refer solely to arrangements which includes a Memorandum of Agreement or a Memorandum of Understanding, or does it include more informal relationships which are not defined by any documentation? Local agencies collaborate with many entities on various levels, and the value of some of these collaborations, while worthwhile and effective, is difficult to quantify. Also, the concept of expanding Agency Capacity is potentially problematic in that it could mean a variety of things. This</p>

could lead agencies to omit some collaborations in which an agency plays an important role but any increase in agency capacity is difficult or impossible to quantify.
<b>Comment 114 (Southwest Oklahoma Community Action ; Other/Unknown in OK)</b>
Module 2: No Comment
<b>Comment 115 (State Of North Carolina; State in NC)</b>
Module 2: Module 2 Agency Expenditures, Capacity and Resources  Module 2, Section A: (page # 24)  The current proposal does not include a national goal for agency capacity. Specifications of expenditures and activities surrounding agency capacity building as indicated in Table I and Table 2 support the need for a national goal regarding agency capacity.  Module 2, Section B: (page # 25)  The current proposal does not include a national goal for agency capacity. Specifications of activities surrounding agency capacity building as indicated Items 1, 2, 3 and 4 supports the need for a national goal regarding agency capacity.
<b>Comment 116 (Texas Association Of Community Action Agencies, Inc. (TACAA); Other/Unknown in TX)</b>
Module 2: No Comment
<b>Comment 118 (The State Of New York Community Action Association ; State Association in NY)</b>
Module 2: No Comment
<b>Comment 119 (TN Department Human Services ; State in TN)</b>
Module 2: No Comment
<b>Comment 120 (Tompkins Community Action ; Eligible Entity/Local Agency in NY)</b>
Module 2: No Comment
<b>Comment 121 (Total Action For Progress ; Other/Unknown in VA)</b>

Module 2: No Comment
<b>Comment 123 (Tri County Community Action ; Other/Unknown in MN)</b>
Module 2: No Comment
<b>Comment 124 (U.S Department Of Health And Human Service ; Eligible Entity/Local Agency in DC)</b>
Module 2: No Comment
<b>Comment 125 (Vermont Community Action Partnership ; Other/Unknown in VT)</b>
Module 2: No Comment
<b>Comment 126 (Vernon Community Action Council, Inc.; Eligible Entity/Local Agency in LA)</b>
Module 2: No Comment
<b>Comment 129 (Western New York Community Action Agency; Eligible Entity/Local Agency in NY)</b>
Module 2: No Comment
<b>Comment 130 (Wisconsin Community Action Program Association ; State Association in WI)</b>
Module 2: * The ROMA: Next Generation requirement for an increased level of demographic characteristics to be collected will create an undue burden on the low-income families seeking out services - even to the point where such a burden may cause a family to “walk away” from receiving assistance
<b>Comment 131 (Wisconsin Department Of Children And Families; Eligible Entity/Local Agency in WI)</b>
Section B: (page # 5-6)
p. 6 – B.7 Summary Analysis: The first six bullet points all seem like they will be easy for states to answer and will provide useful information.
The last two bullet points appear to place new expectations on the State office that are not included in the State Accountability Measures. They may be problematic on two levels: 1) they would increase the workload for our state’s CSBG administration, which is currently handled by one staff person; and 2)

our state's network of eligible entities values local control and is not looking to the State for directives on their programming decisions.

“Based on analysis, what services, strategies, or administrative practices were identified to be shared across the State?” The passive voice makes it confusing. Is the State CSBG office charged with identifying best services, strategies, and administrative practices to share across the state? Is this a new requirement from OCS?

“Based on analysis of performance data, what changes will the State encourage and support with the local eligible entities?” Is this question referring to 5.Sii? from the State Accountability Measures, which requires States to provide individual written feedback on the each eligible entity's performance in meeting ROMA goals, or does it refer to a new requirement?

Module 1, Section E: (page # 10-14)

p. 14 - E.9b. Carryover for this Fiscal Year: Wisconsin's CSBG contracts operate on the calendar year and the agencies have 90 days after the end of December to close out their contracts. Therefore, the State did not have the final data to report at the time the Annual Report is due at the end of March. Our office will be able to send the correct Carryover amount during April, a few weeks after the Annual Report is submitted.

Module 1, Section H: (page # 20-21)

p. 21 – H.6 Single Audit Review: Does “Audit Number” mean “Report ID”?

Module 1, Section I: (page # 22)

p. 22 – “State and Eligible Analysis of Data: Describe how the State validated that the eligible entities used data to improve service delivery.”

Would this be addressed by monitoring the agencies for CSBG Organizational Standard 9.3, which states, “The organization has presented to the governing board for review and action, at least within the 12 months, an analysis of the agency's outcomes and any operational or strategic program adjustments and improvements identified as necessary.”?

What other expectations would there be relating to how the State validates that the eligible entities used data to improve service delivery?

, Section A: (page # 24)

p. 24 – Table 2 – Details on Agency Capacity Building Activities Funded by CSBG: I'd recommend including “Volunteer Coordination” and “Grant Writing” to the list of activities.

Module 2, Section B: (page # 25)

1. Hours of Agency Capacity Building - This will be very difficult to provide an accurate count of all hours spent in capacity building. Providing hours spent in training as in the current IS Survey is relatively straightforward, but counting all of the hours staff and board members spend in “planning and assessment” activities would be much more complicated and time consuming. For some staff members, that could be a majority of their work hours and for board members, much of their time in regular board meetings and committee meetings could be considered capacity building activities. This would also be

Entire Module 2

<p>very much dependent on how agencies interpret the terms “planning and assessment”. In addition to the burden of tracking these hours, the practical utility of this information is questionable.</p>
<p>4. Partnerships Developed to Expand Agency Capacity – It is unclear what agencies would be counting here. The top row says Partnerships, but the column header says it’s an unduplicated count of organizations. This will cause confusion if, for example, an agency works on a taskforce with five other agencies. Would the agency count the taskforce as five organizations, or one partnership?</p>
<b>Comment 132 (Work And Family Support Bureau; Other/Unknown in NM)</b>
Module 2: No Comment
<b>Comment 133 (WSOS Community Action; Eligible Entity/Local Agency in OH)</b>
Module 2: No Comment