

This report contains the Module 4 Content for the following comments:

1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22,23,24,25,26,27,28,29,30,31,32,33,34,35,36,37,38,39,40,41,42,43,45,46,47,48,49,50,51,52,53,54,55,56,57,58,59,60,61,62,63,64,65,66,67,68,69,71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86,87,88,89,90,91,92,93,94,95,96,98,99,100,101,102,103,104,105,106,107,108,109,110,111,112,113,114,115,116,117,118,119,120,121,123,124,125,126,127,129,130,131,132,133,134

Comment 1 (Arizona Department Of Economic Security, Division Of Aging And Adult Services, Community Action Programs And Services (Daas/Caps) ; State in AZ)

Module 4: Module 4 - Individual and Family Level: (pages 51-75)

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

The State CSBG State office shares concerns with the State's Community Action Network and the Community Action Partnership on this module. The data requested may not provide valuable information since Community Action agencies serve the majority of participants once in a given program year. The State CSBG Office believes that this data may be more valuable over time, than in an individual program year. The State and the Network concur that Section A and B will create challenges with CAA's reporting systems. The State CSBG office also agrees this report should be removed.

Module 4, Section B: All Characteristics Report: (page # 53-54)

Items 13 and 14: The State CSBG Office would like to have the opportunity to identify households earning income from self-employment, independent contracting, small business, or family businesses. The development of resources and opportunity for families to achieve economic sustainability through entrepreneurship and microbusiness enterprises is of interest to Community Action at large. Identifying these households at the local level could provide valuable insights into serving this population. This information would be especially useful for agencies and their partners operating or considering asset development and adult education programs. There appears to be an assumption that low-income individuals are either conventionally employed or not. The category "Other" is too insufficient to be useful. The economic climate in recent years has taken a toll on small and family owned businesses, and led many families who depend upon this type of income to seek assistance.

Module 4, Section C: Individual and Family NPIs: (page # 55)

The State CSBG Office concurs with the following comment made by the Community Action Partnership: "The indicators selected and included in the clearance package are not helpful or practical when reporting customers stabilized as a result of the eligible entity's work. One option duplicates data already collected and the second uses a tool that defines financial stability based on a construct the uses assumptions drawn from the general population, not low-income individuals and families specifically." The State CSBG Office is also concerned regarding technical methods for responding to a locally aggregated question. The State CSBG Office also concurs that the reporting mechanism may impact Public entities' decision making processes when contracting with local and neighborhood providers in the community that may not be technologically able to provide the requested data. The State also agrees

with the Network regarding Section C, which refers to tracking of clients at 180 days. Most CAAs do not have the funding resources to track clients receiving services for that length of time (accept for WIOA clients). Many also do not have the resources to track outcomes over multiple time periods. This would result in spotty reporting, and reduce the value of State aggregated data. Recommend removing it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development.

The State CSBG Office concurs with the following comment made by the Community Action Partnership: “Include a 4th ROMA Goal: Agencies Increase their capacity to achieve results. Reinstate this national goal that addressed the critical role the network of local agencies serving 99% of US counties plays in addressing poverty. Reasons for exclusion have been inadequate to date. Because agency capacity is critical to the ultimate success of programs and services, it is important to clearly state this objective in the overall National Goals. This also highlights the broader need of the Network for ongoing training, technical assistance, and general capacity-building supports.” This goal is contained in the CSBG statute, and goes hand in hand with improving the communities the agencies serve.

Comment 2 (Clarity, Impact And Performance Project Steering Committee; RPIC in ID)

Module 4: Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)
Currently, we are not able to fully unduplicated the data provided in the participant characteristics section due to different systems used for those programs we report on in this section (Service Point and Opus). In the new version, this will remain the same, and given the option now to report an estimated number of individuals/households not included in the report, data from either Opus or Service Point will need to be pulled out into this estimated number which will result in decreased unduplicated numbers being reported.

Disconnected Youth – We do not currently collect or have a way to collect this data for participants in the programs included in this report.

Work Status, Health Insurance Sources, Non-Cash Benefits – we will have limited data to report in these sections because this information is not available for all participants included in this report.

Module 4, Section B: All Characteristics Report: (page # 53-54)

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Module 4, Section C: Individual and Family NPIs: (page # 55)

Employment- Idaho will define “living wage” as 200% for consistency across the network, but what about other states? This again points to the fact that agreed upon definitions are necessary in order to insure any integrity and relevancy of the data.

Education and Cognitive Development- Kindergarten readiness, obtaining GED or diploma and post-secondary education or training goals are a match to CLIPP metrics. Income and Asset Building- CLIPP metric of adding money to savings matches 4, Reduction of debt to income ratio is a CLIPP metric not shown here.

Housing- if someone has housing for longer than 180 days- are they also reported in the longer than 90 days metric? What about timing of those who get housing near the end of the reporting period, where is the metric reported? Add those in crisis to designate those who receive assistance or those in immediate threat of foreclosure CLIPP metric of fewer households experiencing home energy loss is not shown; spending less of income on home energy is covered in 7.

Health and Social/Behavioral Development- Please define case management program or similar intensive program? There are a lot of variances possible with this definition; meaningful for Head Start; this is a subjective measure. If someone is living independent for longer than 180 days- are they also reported in the longer than 90 days metric? What about timing of those who achieve independent living near the end of the reporting period, where is the metric reported? What does living independent situation mean? What does recidivating event mean? Does the six months begin at intake? CLIPP metrics related to increased sense of control and options are more detailed than those shown here.

Civic Engagement/Community Involvement-1. Why is this specific to Community Action program participants instead of "the number of"; does this mean low-income volunteers? Policy Council? 1a.-1c. - What does this mean? This seems to be the same question broken down in different ways. 3 of the CLIPP metrics regarding expanded social networks and connections are not shown here; individuals spend more hours volunteering or supporting others in their community is shown in 1.

Stability- We are unclear whether this part of this section is required or not. If it is required, it will be extremely problematic to get unduplicated counts.

Stability 2. - Please clarify whether the abbreviated survey can be used.

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

Clarification is needed for these sections. If we choose indicators within a particular domain to report on in Section C, are we then responsible to report on that same domain in Section D, or does Section D work in the same way as Section C (i.e. we are able to choose which ones are relevant and have data to report on)?

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

Clarification is needed for these sections. If we choose indicators within a particular domain to report on in Section C, are we then responsible to report on that same domain in Section D, or does Section D work in the same way as Section C (i.e. we are able to choose which ones are relevant and have data to report on)?

Module 4, Section D: Individual and Family Services: (page # 68-75)

Support Services- Transportation Services CLIPP metric is based on households spending less time

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"getting where they need to go"

Support Services- Immigration Support Services CLIPP metric is more detailed; more adults achieve their goal of obtaining legal status/citizenship and more children achieve their goal of obtaining legal status/citizenship- these services are not covered in this metric.

Civic Engagement and Community Involvement Services- What does voter education and access mean? How would this be tracked?

Clarification is needed for these sections. If we choose indicators within a particular domain to report on in Section C, are we then responsible to report on that same domain in Section D, or does Section D work in the same way as Section C (i.e. we are able to choose which ones are relevant and have data to report on)?

Comment 3 (Hill Country Community Action Association, Inc. ; Eligible Entity/Local Agency in TX)

Module 4: No Comment

Comment 4 (Sacramento Employment And Training Agency (Seta) ; Other/Unknown in CA)

Module 4: Regarding Module 4, Section C, Stability Indicators, households do not just reach stability and move ahead in their lives. Rather, it is more like ripples on a pond as households make incremental progress after a disruptive event.

Comment 5 (Action For Better Community ; Eligible Entity/Local Agency in NY)

Module 4: The agency finds no practical use for a separate client characteristics report based on new customers. First, the agency does not currently have a definition of “new customer” – this would require some agency staff time and training to establish. Second, the definition of new customer would presumably vary from agency to agency, making aggregate data of little use. Finally, the agency emphasizes that what it DOES find practical, is an analysis of services and outcomes and which are in greater or less demand, and which are achieved at greater or lower rates. That information is useful to the agency. Having obtained that information, the agency would only then ask if an influx of customers with different characteristics was one of many potential variables affecting these changes. Starting with that variable is not something the agency would currently consider to be an effective use of time and resources.

Module 4, Section C

The agency considers the stability indicators to be of no practical value. The agency and its customers do not consider National Performance indicators to be measures of successful outcomes. It would not be sensible to aggregate the customers achieving one or more NPIs and claim that those customers achieved a greater degree of stability relative to those customers that did not.

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The same logic applies to “improved financial well-being.” The agency and its customers do not use this construction; instead customers have more concrete goals with milestones that lead to the achievement of those goals. While the agency could use “progress toward goals related to financial well-being” as an indicator of stability, this still excludes customers with important stability-related goals that are NOT directly connected to financial well-being. For this reason, the agency considers this measure unnecessary and of no practical benefit.

Module 4, Section A

The reporting of new customer characteristics offers no practical benefit to the agency, but comes at some additional cost. It is recommended that this requirement be removed.

Module 4, Section C

For the reasons described previously – the variation of how agencies and customers define stability, the irrelevance to customers of the National Indicators and the narrowness of the “financial well-being” concept – it is recommended that the Stability Indicators be removed.

Comment 6 (Action For Boston Community Development Inc.; Other/Unknown in MA)

Module 4: * Module 4: Characteristics for New Individuals and Households Report. The utility of this information is unclear, and there are such significant definitional and practical challenges in data collection that aggregated data is likely to be meaningless. The populations served by Community Action Agencies are fluid, in that individual clients may participate in different services over multiple years, and may move in and out of contact with the agency; because no definition of “new” is provided in the guidance, reported numbers will be ambiguous. In any case, our experience is that basic demographic characteristics of this kind will add little value to agency or state analysis; there are certainly many more accurate, sensitive, and rapid methods of tracking changing community needs, if that is the intention.

Comment 7 (Allegany County Community Opportunities And Rural Development, Inc. (Accord); Eligible Entity/Local Agency in NY)

Section A: Characteristics for NEW Individuals and Households: (page # 52) Remove the Characteristics for NEW Individuals and Households Report. This report has no practical utility at the local level given the time and expense to create it at each local agency. This is not necessary for agency performance, and the intentions outlined by OCS for its use are not reflective of how local agencies and states look at their communities to assess needs, develop programs, and report progress. It also lacks utility at the state level given that data such as this rolled up to the state level will be skewed by large population centers and decrease the practical utility of the data even further. While we have a data collection system that may allow us to track this, it will be very time consuming and of no use to us overall. It would be a struggle to integrate the required data given their use of multiple (and sometimes incompatible) reporting systems. We serve families over time and with no definition of “new” being provided for review, the CSBG Network will be unable to implement this report consistently. Defining an individual or family as new becomes challenging when they may receive different services over many years (e.g. Early Head Start, child care, after school programs, youth programs, job training, WIC,

food boxes, LIHEAP, etc.).

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

The indicators selected and included in the clearance package are not helpful or practical when reporting customers stabilized as a result of the eligible entity's work. One option duplicates data already collected and the second uses a tool that defines financial stability based on a construct the uses assumptions drawn from the general population, not low-income individuals and families specifically. Because financial well-being means something very different for the low-income population in comparison to the general population, use of the scale will produce data of limited utility.

Include a 4th ROMA Goal: Agencies Increase their capacity to achieve results. Reinstate this national goal that addressed the critical role the network of local agencies serving 99% of US counties plays in addressing poverty. Reasons for exclusion have been inadequate to date. Because agency capacity is critical to the ultimate success of programs and services, it is important to clearly state this objective in the overall National Goals. This also highlights the broader need of the Network for ongoing training, technical assistance, and general capacity-building supports.

Finally, the agency's estimated time burden of 242 hours per sub-grantee (local Community Action Agency) is low. The burden of providing an estimate of the time it would take at this point is beyond our scope, due to time limitations. Given the broad spectrum of systems and individual jobs that would be impacted, not to mention training, QI, and the need to develop data sharing systems in our community and between our funding sources seems, the time will be substantial and must be found with no additional funding.

Comment 8 (Ashtabula County Community Action Agency; Eligible Entity/Local Agency in OH)

Module 4: No Comment

Comment 9 (Association Of Nationally Certified Roma Trainers ; Eligible Entity/Local Agency in N/A)

Module 4: One area needing clarity is the proposed two demographic reports. While we support agencies reporting on an unduplicated count of all individuals and families served by local agencies, we are not completely convinced that the use of "new" characteristics report will be worth the burden to disaggregate these individuals from the whole data base of demographics. More clarity related to how the two different reports would be used is needed.

A second area is the so called "stability indicators" which do not capture much of the work that agencies do to help families become stable (moving from in-crisis or vulnerable status). We support the use of stability indicators, but feel they must more accurately describe this first step on the continuum to self-sufficiency or economic stability. We recommend language that would demonstrate the number and percent of individuals and families who avoided or reduced a crisis.

Comment 10 (Blue Valley Community Action Partnership; Other/Unknown in NB)

Module 4: I also have concerns as to year to year tracking of clients since many partnering entities do not track such clients beyond the current year. I laud the idea of multi-year tracking, I just wonder how the tracking and reporting will follow ... most grants want yearly totals, while in process numbers do not reflect accomplishments.
Comment 11 (California Community Action Partnership Association; Other/Unknown in CA)
Module 4: No Comment
Comment 12 (Cap Service ; Other/Unknown in WI)
<p>Module 4: Module 4: Remove the Stability Indicators. Poverty is complex and fluid. The indicators selected and included in the clearance package are not helpful or practical when reporting customers stabilized as a result of the eligible entity's work. One option duplicates data already collected and the second uses a tool that defines financial stability based on a construct the uses assumptions drawn from the general population, not low-income individuals and families specifically. Because financial wellbeing means something very different for the low-income population in comparison to the general population, use of the scale will produce data of limited utility.</p> <p>Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57). We are in agreement with the Partnership feedback and would ask that you please remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required. CAP Services is not provided funding to track for that period of time, leading to an inability to report the data and a possible impression of under-performance. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Data collection systems used by agencies also simply lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.</p> <p>Module 4 Please also remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, "The following outcome indicators answer the following commonly asked question: How many people (or families) are 'better off/lives improved' because of CAAs work?" The first option is duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey not specific to families with low-incomes and is too general to provide information needed or sought. In short, the scale is an inappropriate measure and will not result in the collection of useful data.</p> <p>Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67) • remove this statement from the data form: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. This sweeping statement leads one to believe the future expectation will be much broader than currently expected and exceed our capacity and the resources available to complete. It should be edited to clearly state this is limited to Workforce Investment and Opportunity Act (WIOA) activity.</p>

Comment 13 (Cattaraugus Community Action, Inc.; Eligible Entity/Local Agency in NY)
Module 4: No Comment
Comment 14 (Center For Community Future ; Other/Unknown in N/A)
<p>Module 4:</p> <p>MY COMMENT. If OCS and NASCSP want to find out what change(s) a CAA is helping to produce in individuals, rather than trying to do it across the entire CSBG network through ROMA Next Gen, then OCS should fund or require evaluations at the CAA level.</p> <p>DISCUSSION. For \$25,000 to \$50,000, a CAA could hire a university professor who would help them structure and manage a three- to five year evaluation of a program or strategy that would provide insights about, and maybe even evidence of, changes the CAA helped create.</p> <p>OCS could fund these evaluations as separate projects. OCS required and funded evaluations as part of the Demonstration Partnership Program awards in the late 1980's. About 80 evaluations were done. Those evaluations helped microbusiness and family development strategies expand and go to scale.</p> <p>OCS could simply require that CAA's do an evaluation using their block-grant pass through money. OCS does not now require evaluations of what CAA's do with block grant money. In 1979-81, CSA mandated as part of the nationwide Grantee Program Management System that every CAA must do an evaluation on one of their programs every three years, using money from their ongoing CSA allocation. It was a good requirement then, and it would be a good one now.</p>
Comment 15 (Center For Community Futures; Other/Unknown in CA)
No Module 4 Content for this comment.
Comment 16 (Central Missouri Community Action ; Other/Unknown in MO)
<p>Module 4: Module 4 - Individual and Family Level: (pages 51-75)</p> <p>Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)</p> <ul style="list-style-type: none"> • T/TA may be needed to ensure proper collecting of information, including clarity around the definition of "new". How will this data be used? <p>Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)</p> <ul style="list-style-type: none"> • These make sense, but could still be condensed some. Not sure if the general ones, such as Education #6 or Civic Engagement #1c, are necessary as NPIs, but possibly just local indicators.

MODULE 4- ENTIRE COMMENT

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

- The planning accuracy percentage does not seem necessary for the annual report, but is good for local evaluation. This would also be a need for T/TA so agencies know how to do this correctly and improve targeting.

- The 180 day follow-up was somewhat of a concern, but the Missouri State CSBG Administration has implemented an extended case management option for FY17 to assist CAA's with following clients. This allows for case management services to continue with clients who have exceeded 125% of poverty for up to 2 years to help with maintenance of outcomes and stability. Even so, T/TA emphasis may be needed on continued engagement and client follow-up.

- Page 67: Stability, #2 – In Missouri, we use the Missouri Family Self-Sufficiency Scale which already includes a subscale on income that we could revise slightly to get more direct information for this indicator. We would propose the option to do this rather than use an additional scale.

Overall, we agree with the need to improve reporting and data collection in community action. However, it should be manageable with the resources agencies have available. This is not to say that requirements should not be put above where many agencies are to obligate improvement, but the improvement should be possible and with adequate support. We know this work is important and do not want the inability of some to meet the requirements or provide adequate data to cause community action to appear ineffective. The NPIs should be able to be aggregated at the national level, be meaningful to decision makers, and show the effectiveness of community action.

Comment 17 (Central Nebraska Community Action Partnership; Other/Unknown in NE)

Module 4: No Comment

Comment 18 (City Of Austin Health And Human Services ; State in TX)

Module 4: Module 4 - Individual and Family Level: (pages 51-75)

The current reports we submit are clearer in terms of new (unduplicated) along with ongoing (cumulative) clients. New vs. All Characteristics is more confusing. Several new data points are being added here as well, which will mean additional time and energy spent on gathering all the data. Please consider prioritizing what data is most important to collect to demonstrate the greatest impact of our work. It will also be important that those of us who report on these measures get clear instructions on what is meant by some of the terminology, and how we are expected to gather the data and document it. For example, how do you determine if someone has increased their social network? What documentation would we be expected to gather to support the increase?

We are very concerned about the move to try and track clients for 180 days (6 months). It is already difficult for us to keep people engaged for 90 days to provide us all the documentation we are required to keep and report. In addition, if we are truly dedicated to helping people gain self-sufficiency as quickly as possible, so they no longer need to rely on our services, tracking them for 180 days seems counterintuitive.

Module 4, Section D: Individual and Family Services seems to repeat a lot of the information already gathered in Section C. Please consider streamlining all these elements as much as possible, to decrease duplicative reporting in multiple different sections. These are all good strategies that could be recommended to get to the data reported in the earlier section, but it is not clear how valuable it is to list all of these individual strategies and gather data on each one of them.

Comment 19 (Colorado Community Action Association; State Association in CO)

Module 4: Individual and Family Level: (pages 51-75)

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

· The reporting of the number and characteristics of customers served by CEE's each year is important data to be collected and is required by the CSBG Act. However, the proposed Baseline Characteristic Report will require additional work for local CEE's (and is often not possible for many CEE's given their current data collection systems), and will not provide information that is useful or comparable at a state or national level. A report such as the proposed Baseline Characteristic Report has little value, usefulness or integrity given how local agencies operate and how customers access services. It would be a much better use of resources to develop tools to help local agencies do internal analysis rather than attempt to have an aggregate report at the state or federal level. Improved local analysis would be a significant outcome for ROMA Next Generation (but is not currently encompassed in the proposed changes).

<p>Module 4, Section B: All Characteristics Report: (page # 53-54)</p> <ul style="list-style-type: none"> For all individuals/families not included in this report (questions below the unduplicated individuals and families questions): collecting this information in this manner will be ineffective and will not be useful at the state/national level. Make this an open ended question or remove it from the section. <p>Module 4, Section C: Individual and Family NPIs: (page # 55)</p> <p>Agree with the Community Action Partnership's comment on this section: Remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, "The following outcome indicators answer the following commonly asked question: How many people (or families) are 'better off/lives improved' because of CAAs work?" The first option is duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau's Financial Well-Being Scale relies on assumptions and definitions about what constitutes "well-being" drawn from the general population. This will result in the collection of data of limited utility for two reasons. First, compared to what constitutes financial well-being as defined by working and middle class Americans, the large majority of agency customers will be at the lowest end of the scale, meaning there will be little variance in the data to allow for meaningful comparison. Second, what constitutes successful outcomes for most agency customers would only result in slight changes on the scale. For example, doubling savings from \$50 to \$100 a month would be represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. In short, the scale is an inappropriate measure and will not result in the collection of useful data.</p> <p>Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)</p> <p>N/A</p> <p>Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)</p> <p>N/A</p> <p>Module 4, Section D: Individual and Family Services: (page # 68-75)</p> <p>N/A</p>
Comment 20 (Colorado Department Of Local Affairs ; Other/Unknown in CO)
Module 4: No Comments
Comment 21 (Combined Community Action ; Eligible Entity/Local Agency in TX)
Module 4: No Comment
Comment 22 (Community Action Agency ; Other/Unknown in NE)

MODULE 4- ENTIRE COMMENT

Module 4: Module 4 - Individual and Family Level: (pages 51-75)

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

This requirement seems unnecessary. If it is to compare the change between “New” with “All”, it will not produce that.

Module 4, Section B: All Characteristics Report: (page # 53-54)

Module 4, Section C: Individual and Family NPIs: (page # 55)

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

What if there are NPIs that do not fit into any of the descriptions?

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

It will take so much time to gather target numbers on all the NPIs from all of our departments.

Comment 23 (Community Action Agency Of Beaver County ; Eligible Entity/Local Agency in PA)

Module 4: mission of CAAs in our communities. Furthermore, our agency like many other agencies throughout our state and, I would surmise, throughout the country, does not currently have the capacity to provide a truly unduplicated number of people receiving services by domain. Many of our services such as energy assistance and housing/homeless services have separate data reporting systems in our area. The sole purpose that these areas are difficult to track. I also have concerns as to year to year tracking of clients since many partnering entities do not track such clients beyond the current year. I laud the idea of multi-year tracking, I just wonder how the tracking and reporting will follow ... most grants want yearly totals, while in process numbers do not reflect

Comment 24 (Community Action Agency Of Butte County Inc. ; Other/Unknown in CA)

MODULE 4- ENTIRE COMMENT

<p>Module 4: The All Measures Report of the Annual Report process seems to be a reasonable modification. However the Baseline Measures Report exceeds the ability of many in the network to reasonably complete and should then be omitted. The effort that will be necessary to put into the completion of a Baseline Report will exceed its utility both locally and at other levels. Other sources of measurement are more cost-effective in seeking to identify a baseline of conditions without going the extra distance (including time, resources and more) of creating an entirely new set of descriptors from data that may or may not be available easily (translate affordably). While the use of the current NPI structure is considered a snapshot in time it is conceivable that more work could be done to enhance the utility of existing data sets over time.</p>
Comment 25 (Community Action Agency Of North Alabama ; Other/Unknown in AL)
Module 4: No Comment
Comment 26 (Community Action Agency Of Northwest Alabama, Inc.; Eligible Entity/Local Agency in AL)
No Module 4 Content for this comment.
Comment 27 (Community Action Agency Of Northwest Alabama, Inc.; Eligible Entity/Local Agency in AL)

Module 4: Section A: Characteristics for NEW Individuals and Households: (page # 52)

Not sure what “new” means in this context. Would characteristics be for new clients or new services or would households that split be considered new? A new and separate characteristic report should not be needed.

Module 4, Section C: Individual and Family NPIs: (page # 55)

Why does the NPI’s need a ‘percent’ for outcomes? Tracking for 90 or 180 days is unrealistic and sets up an atmosphere of having to ‘meet’ the indicator. The loser is the household requesting assistance which the agency cannot meet due to making follow-up a priority. ALL 90-180 days criteria should be removed. Case management is not about meeting a 3 to 6 month date. People obtain financial independency and self-sufficiency at different levels. Individual and families themselves must determine what self-sufficiency is to their household.

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

‘Stability’ is redundant and should be removed. When a client is enrolled in the “income and Asset Building”, the ‘stability’ question is answered by meeting the indicator outcome.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

The second of 3 layers to the NPI’s. A format should be picked without having to go to another ‘layer’ to answer the same question in a different way. The ‘levels/layers’ are unnecessary. Of what use is the ‘target’ or ‘percentage’? Who uses this number?

Module 4, Section D: Individual and Family Services: (page # 68-75)

The third layer to reporting on the same NPI’s as above. The third breakdown seems to have little to no value in reporting on a state or federal level and many of the items are the same answers already reported on earlier pages. It looks more like a local level tool. Should be removed or have the option of local agencies using for in-house purposes only

Comment 28 (Community Action Agency Of Northwest Alabama, Inc. ; Eligible Entity/Local Agency in AL)

<p>Module 4: Module 4 - Individual and Family Level: (pages 51-75)</p> <p>Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52) Not sure what “new” means in this context. Would characteristics be for new clients or new services or would households that split be considered new? A new and separate characteristic report should not be needed.</p> <p>Module 4, Section C: Individual and Family NPIs: (page # 55) Why does the NPI’s need a ‘percent’ for outcomes? Tracking for 90 or 180 days is unrealistic and sets up an atmosphere of having to ‘meet’ the indicator. The loser is the household requesting assistance which the agency cannot meet due to making follow-up a priority. ALL 90-180 days criteria should be removed. Case management is not about meeting a 3 to 6 month date. People obtain financial independency and self-sufficiency at different levels. Individual and families themselves must determine what self-sufficiency is to their household.</p> <p>Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57) ‘Stability’ is redundant and should be removed. When a client is enrolled in the “income and Asset Building”, the ‘stability’ question is answered by meeting the indicator outcome.</p> <p>Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67) The second of 3 layers to the NPI’s. A format should be picked without having to go to another ‘layer’ to answer the same question in a different way. The ‘levels/layers’ are unnecessary. Of what use is the ‘target’ or ‘percentage’? Who uses this number?</p> <p>Module 4, Section D: Individual and Family Services: (page # 68-75) The third layer to reporting on the same NPI’s as above. The third breakdown seems to have little to no value in reporting on a state or federal level and many of the items are the same answers already reported on earlier pages. It looks more like a local level tool. Should be removed or have the option of local agencies using for in-house purposes only.</p>
<p>Comment 29 (Community Action Agency Of Southern New Mexico; State Association in NM)</p>
<p>Module 4: Module 4 - Individual and Family Level: (pages 51-75)</p> <p>Module 4, Section B: All Characteristics Report: (page # 53-54) Response: Add “No Children” to the Household Type, Single. This is confusing to “singles” who have children, but are not married. Unmarried adults sometimes check “single” even when they have children.</p>
<p>Comment 30 (Community Action Association ; State Association in NM)</p>

<p>Module 4: - Individual and Family Level (pages 51-75)</p> <p>Module 4, Section B: All Characteristics Report: (page #53-54) Response: Add “No Children” to the Household Type, Single. This is confusing to “singles” who have children, but are not married. Unmarried adults sometimes check “single” even when they have children.</p>
<p>Comment 31 (Community Action Commission Of Erie, Huron, & Richland Counties ; Eligible Entity/Local Agency in N/A)</p>
<p>Module 4: No Comment</p>
<p>Comment 32 (Community Action Committee Of Victoria, Texas; Eligible Entity/Local Agency in TX)</p>
<p>Module 4: No Comment</p>
<p>Comment 33 (Community Action Council ; Eligible Entity/Local Agency in KY)</p>
<p>Module 4: - Individual and Family Level: (pages 51-75)</p> <p>Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52) The term NEW needs to be further defined to make this category valid or useable. Participants frequently transition from one community to another, and/or enroll in various programs throughout the course of the year, so without a clearer definition it will be very difficult to determine who should be counted as NEW.</p> <p>Module 4, Section D: Individual and Family Services: (page # 68-75) This data seems to be duplicated in some areas and will not add much value to the information that is currently being reported.</p>
<p>Comment 34 (Community Action Council Of Lexington-Fayette, Bourbon, Harrison And Nicholas Counties ; Eligible Entity/Local Agency in KY)</p>

<p>Module 4: - Individual and Family Level: (pages 51-75)</p> <p>Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52) The term NEW needs to be further defined to make this category valid or useable. Participants frequently transition from one community to another, and/or enroll in various programs throughout the course of the year, so without a clearer definition it will be very difficult to determine who should be counted as NEW.</p> <p>Module 4, Section D: Individual and Family Services: (page # 68-75) This data seems to be duplicated in some areas and will not add much value to the information that is currently being reported.</p>
<p>Comment 35 (Community Action Council Of Portage County; Other/Unknown in OH)</p>
<p>Module 4: No Comment</p>
<p>Comment 36 (Community Action Partnership ; National Partner in DC)</p>
<p>Module 4: Module 4: Individual and Family Level</p> <ul style="list-style-type: none"> · Remove Section A, Characteristics for NEW Individuals and Households Report, in its entirety. <p>This report (1) is not necessary for the proper performance of agency functions; (2) the collection of demographic data alone does not provide the agency or State CSBG Lead Agency with meaningful information for assessments; (3) there are significant problems defining who constitutes a new individual and/or household; (4) the data has very little meaning when aggregated and reported at the state and federal levels; and (5) many current agency data systems are challenged to produce this information without significant modifications.</p> <ul style="list-style-type: none"> · Remove the 180 day reporting indicator in Section C (except in cases of WIOA) and change the introduction language that currently states this is the expectation that all agencies should work towards. Local agencies lack the capacity (staff, funding, access to customers for follow-up, technology) to track data over such an extended period of time; and (2) many agency data systems lack the appropriate fields to track this data. · Remove the proposed stability indicators in Section C. Neither option provided is appropriate to include. (1) The first option provided is duplicative with regards to data collection, does not provide meaningful information, and poses significant challenges with local agencies' data systems; and (2) the second option uses a scale (the Consumer Financial Protection Bureau's Financial Well-Being scale) that is based on a construct not designed for use with a low-income population and will therefore produce misleading data.

Comment 37 (Community Action Partnership Of Kern ; Other/Unknown in CA)

Module 4:– Individual and Family Level: (pages 51-75)

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

- Remove this report in its entirety. It is not necessary for the proper performance of the functions of the agency, and when rolled up to the state, the information has no practical utility. At a state level it will be misinterpreted and can be influenced by what happens in larger population centers.

- Two further points illustrate this issue. First, the Characteristics report is of little use to determine if the agency is responding to needs identified in its community assessment. Demographic data alone does not identify the needs the new customers may have and is therefore of limited utility in comparison to data about individual, family, and community needs. Second, since several core CAA programs (e.g. LIHEAP) have a large number of new customers with limited or one time contact with the agency, demographic data collected from the “low touch” services would confuse meaningful analysis of demographic trends. Third, many CAAs have to rely on data collected by their partners and grantees (in the case of public agencies), many of whom may have limited capacity to collect demographic data for new individuals and

households. Fourth, there are many practical problems to identifying who constitutes a new customer or household which also constitutes an additional data collection burden on staff.

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

- Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required. Local entities are not provided funding to track those receiving services for that period of time, leading to an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Many of the data collection systems used by agencies also simply lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.

- Remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, “The following outcome indicators answer the following commonly asked question: How many people (or families) are 'better off/lives improved' because of CAAs work?” The first option is duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau’s Financial Well-Being Scale relies on assumptions and definitions about what constitutes “well-being” drawn from the general population. This will result in the collection of data of limited utility for two reasons. First, compared to what constitutes financial well-being as defined by working and middle class Americans, the large majority of agency customers will be at the lowest end of the scale, meaning there will be little variance in the data to allow for meaningful comparison. Second, what constitutes successful outcomes for most agency customers would only result in slight changes on the scale. For example, doubling savings from \$50 to \$100 a month would be represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. In short, the scale is an inappropriate measure and will not result in the collection of useful data.

<p>Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)</p> <ul style="list-style-type: none"> · Remove this statement from the data collection form. Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking). This sweeping statement leads the reader to believe the future expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies. It should be edited to clearly state this is limited to Workforce Investment and Opportunity Act (WIOA) activity.
<p>Comment 38 (Community Action Partnership Of Orange County; Eligible Entity/Local Agency in CA)</p>
<p>Module 4: Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)</p> <p>Tracking New individuals and households is difficult and confusing. Coordination of reporting between programs enrollments and delivery of services based on multiple contracts with different contract periods further complicates completing this section.</p>
<p>Comment 39 (Community Action Partnership Of Riverside County; Eligible Entity/Local Agency in CA)</p>
<p>Module 4: - Individual and Family Level: (pages 51-75)</p> <p>In general, the inclusion of strategies and services in this Module will allow eligible entities to better demonstrate how they are achieving the outcomes reported.</p>
<p>Comment 40 (Community Action Partnership Of San Luis Obispo County, Inc.; Eligible Entity/Local Agency in CA)</p>
<p>Module 4: · Regarding the revised Client Characteristics Report (pages 52-54), I like the proposed changes, but there would be a financial impact for the agency. I don't know specific costs for this, but I'm assuming we would have to pay Client Track to make these changes. This could prove to be costly.</p> <p>· Pages 58--65, Individual and Family NPIs, there are several categories requesting outcomes on clients 180 days out (i.e. "Of the above, the number of unemployed adults who maintain existing employment for at least 180 days.). Many programs struggle to obtain information on clients 90 days out, but 180 days would be extremely challenging. Once a client exits a program, it's hard for the program to remain in contact with them (based on feedback from the programs) to keep in contact with the clients-- they move, change their phone #s, etc.</p>

Comment 41 (Community Action Planning Council Of Jefferson County, Inc.; Eligible Entity/Local Agency in NY)

Module 4: Individual and Family Level: (pages 51-75)

- No Comments

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

- Remove this report in its entirety. It is not necessary for the proper performance of the functions of the agency, and when rolled up to the state, the information has no practical utility. At a state level it will be misinterpreted and can be influenced by what happens in larger population centers.

- Two further points illustrate this issue. First, the Characteristics report is of little use to determine if the agency is responding to needs identified in its community assessment. Demographic data alone does not identify the needs the new customers may have and is therefore of limited utility in comparison to data about individual, family, and community needs. Second, since several core CAA programs (e.g. LIHEAP) have a large number of new customers with limited or one time contact with the agency, demographic data collected from the “low touch” services would confuse meaningful analysis of demographic trends. Third, many CAAs have to rely on data collected by their partners and grantees (in the case of public agencies), many of whom may have limited capacity to collect demographic data for new individuals and households. Fourth, there are many practical problems to identifying who constitutes a new customer or household which also constitutes an additional data collection burden on staff.

Module 4, Section B: All Characteristics Report: (page # 53-54)

- No Comments

Module 4, Section C: Individual and Family NPIs: (page # 55)

- No Comments

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

- Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required. Local entities are not provided funding to track those receiving services for that period of time, leading to an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Many of the data collection systems used by agencies also simply lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.

- Remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, “The following outcome indicators answer the following commonly asked question: How many people (or families) are 'better off/lives improved' because of CAAs work?” The first option is duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau’s Financial Well-Being Scale relies on assumptions and definitions about what constitutes “well-being” drawn from the general population. This will result in the collection of data of limited utility for two reasons. First, compared to what constitutes financial well-being as defined by working and middle class Americans, the large majority of agency customers will be at the lowest end of the scale, meaning there will be little

variance in the data to allow for meaningful comparison. Second, what constitutes successful outcomes for most agency customers would only result in slight changes on the scale. For example, doubling savings from \$50 to \$100 a month would be represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. In short, the scale is an inappropriate measure and will not result in the collection of useful data.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

- Remove this statement from the data collection form: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking). This sweeping statement leads the reader to believe the future expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies. It should be edited to clearly state this is limited to Workforce Investment and Opportunity Act (WIOA) activity.

Module 4, Section D: Individual and Family Services: (page # 68-75)• No Comments

Comment 42 (Community Action Program Associations For Community Action Agencies; State Association in WI)

Module 4: No Comment

Comment 43 (Community Renewal Team ; Eligible Entity/Local Agency in CT)

Module 4: Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

a. Remove this report in its entirety. It is not necessary for the proper performance of the functions of the agency.

b. Data Entry Form is an unnecessary document that will not produce quality data; it has little utility at an agency/local level; and it lends itself to meaningless data at a state and national level. It should be removed. The large number of “one time” customers in programs such as LIHEAP will skew any meaningful interpretation of the data. Aside from the challenge of defining who constitutes a new customer, our agency uses multiple reporting systems and it will have the added burden of tracking new customers across all programs and services.

c. Several core Agency programs (e.g. LIHEAP) have a large number of new customers with limited or one time contact with the agency, demographic data collected from the “low touch” services would confuse meaningful analysis of demographic trends.

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

a. Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required. Our Agency is not provided

funding to track those receiving services for that period of time, leading to an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Data collection systems also lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.

b. Remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, “The following outcome indicators answer the following commonly asked question: How many people (or families) are ‘better off/lives improved’ because of CAAs work?” The first option is duplicative effort to collect the data, and does not provide meaningful information. Data would be difficult to obtain and report due to multiple funder mandated software systems in place – which could lead to under-reporting or double counting. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau’s Financial Well-Being Scale relies on assumptions and definitions about what constitutes “well-being” drawn from the general population. The indicators selected and included in the clearance package are not helpful or practical when reporting customers stabilized as a result of an agency’s work. The first option duplicates data already being collected. The second option which uses a tool (CFPB Financial Well Being Scale) to define financial stability, using assumptions drawn from the general population, but not specifically from low income individuals and families. Financial well-being has different meaning for the low-income population in comparison to the general population. For example, doubling savings from \$50 to \$100 a month would be represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. In short, the scale is an inappropriate measure and will not result in the collection of useful data.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

a. Remove this statement from the data collection form: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking). This sweeping statement leads the reader to believe the future expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies. It should be edited to clearly state this is limited to Workforce Investment and Opportunity Act (WIOA) activity.

Comment 45 (Del Norte Senior Center, Inc.; Eligible Entity/Local Agency in CA)

Module 4: Module 4 - Individual and Family Level: (pages 51-75)

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

Asking for the incredibly detailed statistics being required on any of our individuals and households is challenging, intrusive and likely to result in barriers to service access. Asking us to then separate those into individuals who are new to services, and those who are “existing” is unreasonable.

Module 4, Section B: All Characteristics Report: (page # 53-54)

Same as above.

Module 4, Section C: Individual and Family NPIs: (page # 55)

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

- Health and Social/Behavioral Development, indicator 6 defines seniors as 65 or older. The Older Americans Act, which supports senior nutrition services, defines a senior as anyone age 60 or older. The HUD program that subsidizes housing complexes for low-income seniors defines a senior as anyone 62 or older. The current CSBG age breakdown defines seniors as 55 and older. The inconsistent definition of “senior” for federal programs increases the reporting burden, as clients have to be separated by different age categories for different funding source reporting, even though they are participating in the same blended-funding-supported program.

- A number of indicators require maintenance of a condition for 60 to 180-day follow up periods. This is not always possible and should not be required. Who is to decide which interval is “successful”?

- ALL indicators ask for a percentage of individuals who achieve the goal. Percentages are not always logical.

- The first Stability NPI is nearly impossible to track and not at all useful to the efficient operation of services. The requirement to try to track clients who may be participating in multiple programs across different indicators in an unduplicated manner is not feasible without significant data re-entry or filtering. The disparate funding sources for CSBG agencies all require their own proprietary database and reporting structures. None of the program databases work with each other and trying to aggregate an unduplicated count is practically impossible.

- Where is the indicator that measures participation in Community Action activities without requiring that participants “work with Community Action to improve conditions in the community?” In the case of CAA’s who run community or senior centers, participation in the activities offered at the center is the end outcome. Participants should not be required to become activists in order to be considered to be participating in civic engagement. In other words, outcome 1.b should be a standalone outcome and the indicator measuring engagement in community enrichment activities should be restored.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

Why are “Served” and “Targeted” two different columns? Wouldn’t you target everyone you served to achieve the goal?

Comment 46 (Delaware Opportunities Inc.; Eligible Entity/Local Agency in DE)

Module 4: Module 4 - Individual and Family Level: (pages 51-75)

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

Remove this report in its entirety. It is not necessary for the proper performance of the functions of the agency, and when rolled up to the state, the information has no practical utility. The definition of "new" presents problems. Our agency does not have the capacity to generate this report at present, even after the issues of definition are addressed. Attempts to gather this data will be expensive and the results will be essentially meaningless.

Module 4, Section C: Individual and Family NPIs: (page # 55)

Remove (and percent) wherever it appears. The base information from which the percentage is derived is frequently unknown. Aggregating percentages at the state or national level cannot be provide an

accurate or meaningful number.

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required. Our agency is not provided with funding to track those receiving services for that period of time, leading to an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Collecting this information will be burdensome at best.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

Page 65. The number of seniors should be 60+ consistent with the Older Americans Act. Remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, "The following outcome indicators answer the following commonly asked question: How many people (or families) are 'better off/lives improved' because of CAAs work?" The first option is duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought.

Module 4, Section D: Individual and Family Services: (page # 68-75)

There are gaps in services provided. Sexual assault appears to be an issue which is not reported, nor is WIC. We found no place to report on services to those with disabilities. Car seat safety and youth in foster care. Big Brothers Big Sisters. Nutrition in general. SNAP outreach. Parent Aide. These were accommodated by the previous NPIs. They should not have been discarded. Thank you for the opportunity to comment. We made many of these same comments in response to the initial comment period; however our recommendations regarding these items have yet to be addressed. We trust that our comments will be seriously reviewed.

Comment 47 (Department Of Community Service And Development ; State in CA)

Module 4: Module 4 proves to be the module with the greatest degree of change and poses the greatest challenges to states and the network of CSBG agencies. Module 4 is plagued by some of the reporting features contained within the Characteristics Report and Individual and Family National Performance Indicators.

The Characteristics Report has two iterations: one for new individuals and households and one for all individual households. Through discussions and analysis it is not clear how creation of a baseline adds a notable value to the delivery of services to the individuals and families who receive CSBG services. It has been described that this report is not designed to be a pre- and post- assessment of individual and household composition. However, it appears that there will be duplication of some program participants who are receiving services if the program is short term. For instance, an individual who participates in a program for six months would be reported on both the "New" and "All" report forms. This person would likely not have changed many individual characteristics (i.e.: age, gender, ethnicity, or military status) or household characteristics (i.e.: household type or size) within a six month timeframe. The example is used to be a mere illustration of how this level of documentation could be more burdensome in terms of agency reporting than useful for CSBG. In addition, the "All Characteristics" reports are segregated by individual and household. This seems to be an excessive amount of data collection. This would mean that agency staff would need to collect, reassess and report on an individual and household composition a total of three times. It is difficult to determine how this information would be used and if there is a smaller degree of information

that could be collected in order to tell the same story about the individuals and households we serve.
Comment 48 (Department Of Housing And Community Development ; State in MA)
<p>Module 4: With the exception of Module 4 – Section A “Characteristics for NEW Individuals and Households” (discussed further below), the collection of information proposed in the CSBG Annual Report is necessary and shall have practical utility for our State when supporting the work of our Community Action Agencies (CAAs).</p> <p>While the intent of Module 4 – Section A is understood, the data resulting will be unreliable across all agencies and will lose its utility when aggregated to the State and National level. Since there is such broad variance in agency client tracking and data collection systems across the CAA network, this report will only be as reliable as the data systems of the CAA completing it. Additionally, even if agencies had equal ability to track and collect client data, the report loses its utility once rolled up to the State and National Level since it seems to assume an individual/family did not receive social services elsewhere in the state or country before applying to a specific CAA. In reality, we know many individuals/families in need reach out for services from multiple agencies in the same or different jurisdictions. Our ability to track the demographics of those who reach out for help before an intervention is provided is limited by our ability to share data across agencies and jurisdictions.</p> <p>Remove Module 4 – Section A “Characteristics for NEW Individuals and Households” from the requirements of the report since, as discussed above, the information collected will not yield quality information or have practical utility.</p>
Comment 49 (Department Of Human Services ; State in AR)
Module 4: No Comment
Comment 50 (Department Of Social Services Office Of Community Services ; State in CT)
<p>Module 4: Module 4 - Individual and Family Level: (pages 51-75)</p> <p>Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)</p> <ul style="list-style-type: none"> o “NEW” meaning individuals/households that have never entered the agency for services or individuals/households that have not entered the agency within a specified time period (e.g. 2 years)? <p>O 11. Sources of Household Income – CAAs may be challenged with coming up with an unduplicated count of households as systems collect income information on all household members; households typically have multiple sources of income. Example: For a household with two adults and no children, Adult A may earn income from a. Employment Only and Adult B’s income is categorized as g. No Income. One data point would be assigned to a. and one to g. Therefore the household would be counted twice (heading column states “Number of Households”). It may be more accurate to delete the heading “Number of Households” and indicate that Sources of Household Income in a duplicative number.</p>

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

o A number of these standards are unnecessarily vague. Specific questions include:

o What is meant by “basic needs”? What one household/agency/state may consider to be a basic need is different from another interpretation.

O What is the timeline for avoiding eviction/foreclosure? One might avoid the outcome for a 90 day period only to ultimately be in that situation further into the year.

O What is the measure that should be used for “improved physical health”? One might not lose weight, for example, but increase strength and/or endurance capacity, however neither of these things will likely be a result of the CAA.

O There is no specific measure for “increased sensitivity and responsiveness” for parents toward children. According to which parenting model? Parenting is always an individual and unique choice and this measure seems both vague and potentially insulting toward clients etc.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

Module 4, Section D: Individual and Family Services: (page # 68-75)

Other items:

Reporting Burden – According to the IM, “OCS is keenly aware of the burden data collection, analysis and reporting may have on the CSBG Network. We also believe that these tasks are investments that can help agencies improve, grow and produce breakthrough results. To estimate the reporting burden (the collection and review of performance data as well as the development of any necessary technology) on the CSBG Network to produce the proposed Annual Report, OCS factored in several variables:

1. Whether the data being requested is new or is “usual and customary” for each section of the proposed Annual Report (e.g. local agencies are already legally required to collect much of the demographic data to determine eligibility of participants, while the services and strategies are new); 2. How the data collection effort differs at the state versus the local level (e.g. the states are responsible for reporting on the Administrative Module including performance against the State Accountability Measures as set in each State’s Annual Plan, and for reviewing and analyzing the data collected from the local agencies. The local eligible entities have the burden of tracking participants served and the outcomes they achieve); 3. The current capacity to collect, report and review the requested data, and how that varies throughout the network (e.g. some organizations currently have sophisticated technology and trained staff; others will need to upgrade their technology, and some number will need to develop new systems and train staff); and 4. Over time the burden will decrease as systems are developed or modified and as staff gain experience with reporting and analysis.”

Unfortunately, reporting burden does not take into consideration the activities associated with implementation and integration to ensure compliant reporting. The time effort assumes that systems are in place. The reporting burden/time effort should be revisited to more realistically reflect the time associated with implementation, testing and alignment of Theory of Change and the Annual Report. For example, when CT worked with the LIHEAP staff to align the Assurance 16 Report with ROMA reporting, the initial investment was approximately 50 hours and that number does not include the time investment that will be required to work with our source systems to ensure uniform reporting. Finally it appears that there are no funds identified to assist with the dissemination of the local data entry model and integration of programs for local CAAs. Difficult decisions will have to be made; however, the proposed system and timeline does not allow for CAAs to conduct mindful planning and integration

activities. CT rolled out this effort in 2004 when it implemented its Human Services Infrastructure (HSI) model, the local response to ROMA. Now with the proposed changes, the systems will change and resources must be identified to ensure compliance.

Comment 51 (Dickinson Community Action Partnership ; Other/Unknown in ND)

Module 4: Tracking clients who seek emergency services over the course of up-to 180 days is invasive and does little to protect the rights of the clients and their reasonable expectation of privacy. Our concerns are outlined below.

Module 4: Remove the Characteristics for NEW Individuals and Households Report. This report has no practical utility at the local level given the time and expense to create it at each local agency. This is not necessary for agency performance, and the intentions outlined by OCS for its use are not reflective of how local agencies and states look at their communities to assess needs, develop programs, and report progress. It also lacks utility at the state level given that data such as this rolled up to the state level will be skewed by large population centers and decrease the practical utility of the data even further. In addition, many agencies may either lack management information systems with the capacity to disaggregate this type of data from its overall customer database, or struggle to integrate the required data given their use of multiple (and sometimes incompatible) reporting systems. In addition, as many local agencies serve families over time, with no definition of "new/" being provided for review, the CSBG Network will be unable to implement this report consistently. Defining an individual or family as new becomes challenging when they may receive different services over many years (e.g. Early Head Start, child care, after school programs, youth programs, job training, WIC, food boxes, LIHEAP, etc.).

Module 4: Remove the Stability Indicators. The indicators selected and included in the clearance package are not helpful or practical when reporting customers stabilized as a result of the eligible entities work. One option duplicates data already collected and the second uses a tool that defines financial stability based on a construct the uses assumptions drawn from the general population, not low-income individuals and families specifically. Because financial well- being means something very different for the low-income population in comparison to the general population, use of the scale will produce data of limited utility.

Module 4, Section A: Characteristics for NEW Individuals and Households - Data Entry Form is an unnecessary document that will not produce quality data; it will have little utility at a local level; and it lends itself to meaningless data at a state and national level. It should be removed. Because demographic data alone does not include information about the needs of new customers, this information fails to help agencies determine if they are addressing issues identified in their community assessments. Furthermore, the large number of "one time" customers in programs such as LIHEAP will skew any meaningful interpretation of the data. Aside from the challenge of defining who constitutes a new customer, agencies that use multiple reporting systems will also have the added burden of tracking new customers across all programs and services.

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required. Local entities are not provided funding to track those receiving services for that period of time, leading to an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Many of the data collection systems used by agencies also simply lack

the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.

Remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, "The following outcome indicators answer the following commonly asked question: How many people (or families) are 'better off/lives improved' because of CAAs work?" The first option is duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau's Financial Well-Being Scale relies on assumptions and definitions about what constitutes "well-being" drawn from the general population. This will result in the collection of data of limited utility for two reasons. First, compared to what constitutes financial well-being as defined by working and middle class Americans, the large majority of agency customers will be at the lowest end of the scale, meaning there will be little variance in the data to allow for meaningful comparison. Second, what constitutes successful outcomes for most agency customers would only result in slight changes on the scale. For example, doubling savings from \$50 to \$100 a month would be represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. In short, the scale is an inappropriate measure and will not result in the collection of useful data.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

- Remove this statement from the data collection form: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking). This sweeping statement leads the reader to believe the future expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies. It should be edited to clearly state this is limited to Workforce Investment and Opportunity Act (WIOA) activity.

Comment 52 (Dickinson Iron Community Service Agency ; Eligible Entity/Local Agency in MI)

Module 4: We are concerned with how our current management information systems (that already don't 'talk' to each other) will be able to gather the data needed to fit this report. For example, the characteristic of 'new individuals/households' is difficult to track across our multiple systems and it will be unclear as to who should be considered new. Are they new if they receive a different service within DICSA or only if they've never been through our doors before? It is not data we would look to when assessing community needs or program development.

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

Module 4: Module 4 Individual and Family Level

- o Request to change the case load requirements from 35 to 30 with 180 days retention – this will provide

more flexibility for case managers to support individuals who require additional support such as those transitioning from incarceration back into the community

o The agencies work with a population of individuals who are never going to achieve the goals set forth in the current NPI, but through case management we can assist them in having a better quality of life then they would have if left to fend for themselves. Where do we report on these individuals? Does CSBG recognize lateral moves as successful?

O Not sure what the CSBG mandate is for reporting but performance needs to follow funding period. Perhaps this is a Delaware issues but it is one that needs to be re-evaluated.

O Can continuing clients from one year to the next be counted as clients in which no characteristics is collected and only take characteristics on new client throughout the reporting period. The problem this causes is the perception of servicing clients that are over income, I did see the information on new Characteristics was not sure it addressed this concern.

Comment 54 (East Missouri Action Agency, Inc.; Eligible Entity/Local Agency in MO)

Module 4: - Individual and Family Level: (pages 51-75)

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

I believe that the Characteristics for NEW Individuals and Households Report should not be used. It is meaningless data, and has no practical utility for our agency. I do not know how using this basic demographic data will help our agency to determine that we are meeting our customer's needs. It does not show the impact of our programs in any way. Also, defining an individual, or family as "new" is extremely difficult. Many of the families we work with are on a continuing basis from year to year, and may receive many different services, such as LIHEAP, Head Start, Housing, etc. So, for those families and individuals we serve over time, how would we define "new"? This information is not needed in any way at our agency, and will just be another financial burden considering the time and expense it will take to compile.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

In Missouri, we already use the MO Family Self-Sufficiency Scales (FSS Scales) to assess our customers increase in stability. I believe that the FSS Scales can be revised to include more information in order to meet the reporting requirements for Stability #2. This would be a much more cost effective solution for our state network, rather than using an additional scale.

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

Module 4: * One of the biggest concerns is the department's capacity to obtain the required data. Currently, we are required to report on 300+ data points. The proposal would require reporting of 1,000+ data points. Our current systems and staff are limited. Many of the proposed data points are not currently being collected by our case management system. Technology that will track all of the required information can be costly.

* Future CSBG funds are not likely to be sufficient enough to help sustain such a complicated system and additional staff. OCS has proposed an on-line automated system for use by states and possibly local

agencies.
* Our agency will have to continue with our current case management systems and then manage the data input to the proposed online system. This will cost us staff hours to train and manage.
Comment 56 (Four Square Community Action ; Other/Unknown in NC)
Module 4: No Comment
Comment 57 (Fresno Economic Opportunities Commission ; Other/Unknown in CA)
Module 4: c. Another new form – Characteristics for NEW Individuals and Households Data Entry Form – would be extraordinarily burdensome, time consuming, and costly to produce, for most agencies, particularly agencies the size and breadth of Fresno EOC. We have 14 major programs through which we serve 250,000 individuals each year. But, the many components within these 14 programs total more than 60. It is unclear why such new data should be collected and what value it would add to our ROMA report. Furthermore, collecting such data from among our programs when they are already collecting substantial data for their funders (more than 100 contracts in place now) will without question further burden our directors by adding a significant responsibility on top of reports similar in nature but unique enough and utilizing unique reporting standards and systems such that they would require additional staff and significant expense to respond to ROMA NG.
Comment 58 (Greater Bergen Community Action; Eligible Entity/Local Agency in NJ)
Module 4: - Individual and Family Level: (pages 51-75)
Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52) While information on new clients could be beneficial to individual agencies, I don't know what the information, when aggregated, will tell the states. I think its usefulness is on a local level only, and should not be a part of an annual report.
Module 4, Section C: Individual and Family NPIs: (page # 55) 180 day follow-up is important, but without additional resources almost impossible.
Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67) Overall, these NPIs do a good job of laying out the work of our community action agency. Changing the wording on the last column for % Planning and the definition makes the reason for the column clearer than in the past, however, this is only useful internally. Why collect this information at a state or

national level? A funder only cares if we don't deliver what we said we would, not how well we forecast our outcomes. Stability measures don't give the whole picture. The first measure is better, but still leaves a lot to be desired. For example, someone working toward their HSE can't be counted unless they have achieved their outcome, yet most would say that they are better off right now. The second measure requires us to have clients complete the CFPB scale. In our agency only a small percentage of the clients assisted would be available after receiving services to complete the scale, so it's usefulness as a national measure is limited.

Module 4, Section D: Individual and Family Services: (page # 68-75) Separating the services from the outcomes improves both sections of the report, but it also seems to be a step back into counting services instead of outcomes.

Comment 59 (Greater Bergen Community Action ; Eligible Entity/Local Agency in NJ)

Section A: Characteristics for NEW Individuals and Households: (page # 52) While information on new clients could be beneficial to individual agencies, I don't know what the information, when aggregated, will tell the states. I think its usefulness is on a local level only, and should not be a part of an annual report.

Module 4, Section C: Individual and Family NPIs: (page # 55)
180 day follow-up is important, but without additional resources almost impossible.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67) Overall, these NPIs do a good job of laying out the work of our community action agency. Changing the wording on the last column for % Planning and the definition makes the reason for the column clearer than in the past, however, this is only useful internally. Why collect this information at a state or national level? A funder only cares if we don't deliver what we said we would, not how well we forecast our outcomes. Stability measures don't give the whole picture. The first measure is better, but still leaves a lot to be desired. For example, someone working toward their HSE can't be counted unless they have achieved their outcome, yet most would say that they are better off right now. The second measure requires us to have clients complete the CFPB scale. In our agency only a small percentage of the clients assisted would be available after receiving services to complete the scale, so it's usefulness as a national measure is limited.

Module 4, Section D: Individual and Family Services: (page # 68-75) Separating the services from the outcomes improves both sections of the report, but it also seems to be a step back into counting services instead of outcomes.

Comment 60 (Hinds County Human Resources Agency ; Other/Unknown in MS)

Module 4: Module 4 – Individual and Family Level: (pages 51-75)
No Comments

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52) No Comments

MODULE 4- ENTIRE COMMENT

Module 4, Section B: All Characteristics Report: (page # 53-54)

No Comments

Module 4, Section C: Individual and Family NPIs: (page # 55)

No Comments

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required. Local entities are not provided funding to track those receiving services for that period of time, leading to an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Many of the data collection systems used by agencies also simply lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.

Remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, “The following outcome indicators answer the following commonly asked question: How many people (or families) are ‘better off/lives improved’ because of CAAs work?” The first option is duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau’s Financial Well-Being Scale relies on assumptions and definitions about what constitutes “well-being” drawn from the general population. This will result in the collection of data of limited utility for two reasons. First, compared to what constitutes financial well-being as defined by working and middle class Americans, the large majority of agency customers will be at the lowest end of the scale, meaning there will be little variance in the data to allow for meaningful comparison. Second, what constitutes successful outcomes for most agency customers would only result in slight changes on the scale. For example, doubling savings from \$50 to \$100 a month would be represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. In short, the scale is an inappropriate measure and will not result in the collection of useful data.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67) Remove this statement from the data collection form: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking). This sweeping statement leads the reader to believe the future expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies. It should be edited to clearly state this is limited to Workforce Investment and Opportunity Act (WIOA) activity.

Module 4, Section D: Individual and Family Services: (page # 68-75)

No Comments

Comment 61 (Illinois Association Community Action Agency ; Other/Unknown in IL)

Module 4: Module 4 - Individual and Family Level:

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

Remove this report in its entirety. It is not necessary for the proper performance of the functions of the agency, and when rolled up to the state, the information has no practical utility. At a state level it will be misinterpreted and can be influenced by what happens in larger population centers. These further points illustrate this issue. First, the Characteristics report is of little use to determine if the agency is responding to needs identified in its community assessment. Demographic data alone does not identify the needs

the new customers may have and is therefore of limited utility in comparison to data about individual, family, and community needs. Second, since several core CAA programs (e.g. LIHEAP) have a large number of new customers with limited or one time contact with the agency, demographic data collected from the "low touch" services would confuse meaningful analysis of demographic trends. Third, many CAAs have to rely on data collected by their partners and grantees (in the case of public agencies), many of whom may have limited capacity to collect demographic data for new individuals and households. Fourth, there are many practical problems to identifying who constitutes a new customer or household which also constitutes an additional data collection burden on staff while simultaneously further eroding any public policy value from aggregated data.

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) requirements. Local entities are not provided funding to track those receiving services for that period of time, leading to an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Many of the data collection systems used by agencies also simply lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.

Remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, "The following outcome indicators answer the following commonly asked question: How many people (or families) are 'better off/lives improved' because of CAAs work?" The first option is duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau's Financial Well-Being Scale relies on assumptions and definitions about what constitutes "well-being" drawn from the general population. This will result in the collection of data of limited utility for two reasons. First, compared to what constitutes financial well-being as defined by working and middle class Americans, the large majority of agency customers will be at the lowest end of the scale, meaning there will be little variance in the data to allow for meaningful comparison. Second, what constitutes successful outcomes for most agency customers would only result in slight changes on the scale. For example, doubling savings from \$50 to \$100 a month would be represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. In short, the scale is an inappropriate measure and will not result in the collection of useful data.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

Remove this statement from the data collection form: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this timeframe and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by

those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking). This sweeping statement leads the reader to believe the future expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies. It should be edited to clearly state this is limited to Workforce Investment and Opportunity Act (WIOA) activity. Thank you for the opportunity to submit these comments for your review and consideration. We look forward to our continued involvement in these deliberations as we strive to develop a framework that will truly work for our network. I can be reached directly at dsulamoyo@iacaanet.org or 217-652-0878.

Comment 62 (Inca Community Service; Eligible Entity/Local Agency in OK)

Module 4: Section A: Characteristics for NEW Individuals and Households: (page # 52)

- Remove the report in its entirety. It is not necessary and does not give any useful information to the local agency or state.

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

- Remove the follow-up indicators. Agencies are not provided funding to track those receiving services. The collection of this information is burdensome, usually inaccurate and too expensive for the information obtained.

- Remove the Stability Indicators. Unable to narrow the definition and the meaning causing the information collected to be inappropriate and not useful data.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

- Remove the statements and requirement for tracking outcomes.

Comment 63 (Indiana Housing And Community Development Authority ; State in ID)

Module 4: No Comment

Comment 64 (Iowa Community Action Association; Eligible Entity/Local Agency in IA)

Module 4: Module 4, REMOVE Section A: Characteristics for NEW Individuals and Households: (page #52) Our network has not been convinced how this information is useful to the agency or network as a whole, in relation to measuring performance.

Module 4, Section C: Individual and Family NPIs: (page # 55-66)

Remove the indicator for 90 days and 180 days throughout UNLESS there is funding provided to setup the systems needed to collect/track this information and pay for staff time to implement the process. Local entities are not provided funding to track those receiving services for that period of time, leading

to an inability to report the data. Remove this statement from all forms: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking). This sweeping statement exceeds the capacity of local agencies and the purpose and function of many of the programs operated by local agencies. Additional resources would be needed to successfully implement follow-up with families with a limited income as well as to secure a system to track the data being collected; which many programs offered by Community Action Agencies do not provide.

Comment 65 (Kceoc Community Action Partnership; Eligible Entity/Local Agency in KY)

Module 4: General comment for this section: Why do a baseline? Is the information going anywhere? Also, I continue to be concerned about tracking requirements. Please allow us to make that decision based on the needs of the client and mutually agreed upon tasks/goals/etc. in their case plans. In our experience, our local middle class families are primarily stable. None of us of really self-sufficient; to us, self-sufficiency is depending on no outside resources. Our staff cannot even make that claim as, for instance, our employer is paying part of our health insurance costs.

If we can get our families stabilized, we have made a great accomplishment. Why do we only consider success by the amount of money someone makes? About 18 years ago, we helped our first household become a homeowner. She was a single, disabled SSI recipient back when SSI was about \$545 per month. The lady is still in the home, still making her payments. Was this a success? She's in poverty, but she is a long standing homeowner in the community. She has an asset that only 63% of the county population has, and does it on an income that is only about 33% of the median income of \$25,523.

Comment 66 (Lakes And Prairies Community Action Partnership ; Other/Unknown in MN)

Module 4: Module 4 - Individual and Family Level: (pages 51-75)

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

Remove this report in its entirety. It is not necessary for the proper performance of the functions of the agency, and when rolled up to the state, the information has no practical utility. At a state level it will be misinterpreted and can be influenced by what happens in larger population centers. Demographic data alone does not identify the needs the new customers may have and is therefore of limited utility in comparison to data about individual, family, and community needs. There are also many practical problems to identifying who constitutes a "new" customer or household which also constitutes an

additional data collection burden on staff.

Module 4, Section C: Individual and Family NPIs: (page # 55-57)

Remove the indicator for 180 days. Local entities are not provided funding to track those receiving services for that period of time, leading to an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Many of the data collection systems used by agencies also simply lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.

Remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, "The following outcome indicators answer the following commonly asked question: How many people (or families) are 'better off/lives improved' because of CAAs work?" The first option is duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau's Financial Well-Being Scale relies on assumptions and definitions about what constitutes "well-being" drawn from the general population. This will result in the collection of data of limited utility for two reasons. First, compared to what constitutes financial well-being as defined by working and middle class Americans, the large majority of agency customers will be at the lowest end of the scale, meaning there will be little variance in the data to allow for meaningful comparison. Second, what constitutes successful outcomes for most agency customers would only result in slight changes on the scale. For example, doubling savings from \$50 to \$100 a month would be represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. In short, the scale is an inappropriate measure and will not result in the collection of useful data.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

Remove this statement from the data collection form: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The timeframe of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i. e. longitudinal tracking). This sweeping statement leads the reader to believe the future expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies.

Comment 67 (Lorain County Community Action Agency ; Other/Unknown in OH)

Module 4: No Comment

Comment 68 (Louisville Metro Community Service ; State in KY)

Module 4: Module 4 - Individual and Family Level: (pages 51-75)

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

MODULE 4- ENTIRE COMMENT

· Section A of Module 4 is unnecessary and adds no value for local agencies. In fact, the report becomes even less valuable as the data is aggregated, as there is no way to assure an unduplicated count of people served.

Module 4, Section B: All Characteristics Report: (page # 53-54)

· The new data elements counting veterans and disconnected youth are welcomed additions to the Section G report.

Module 4, Section C: Individual and Family NPIs: (page # 55)

· Include an NPI to measure individuals served who are already employed at the time of first involvement with the CAA. This would allow agencies to report the impact of crisis intervention and stabilization efforts when a crisis threatens the employment of a person served. This is a common problem faced by many low-income people— their job is threatened by barriers as a result of transportation, childcare, health, and housing. CAAs do not only help people obtain employment, CAAs help people maintain their employment to ensure family stability.

· Income and asset building NPIs could be strengthened with the addition of an NPI to measure debt reduction. Debt reduction is a common goal of the people served by CAAs (and the general population), and should be included as a way to measure success for our agencies.

· Reporting individuals who are able to maintain an independent living situation as a result of CAA services is another welcomed addition to the NPIs.

Comment 69 (Lycoming-Clinton Counties Commission For Community Action (Step), Inc.; Eligible Entity/Local Agency in PA)

Section A: Characteristics for NEW Individuals and Households: (page # 52)

- Improvements made are appreciated. Is this talking about NEW Individuals over a year or ever in our system? Head Start families can engage with us for up to 5 years, so each year at enrollment are they counted as NEW?

- This can be very difficult for some CAAs if they do not already have a tracking system in place.

Module 4, Section D: Individual and Family Services: (page # 68-75)

- For the Data Entry Forms could there be an 'other' category as there are services that are not detailed that data can be gathered on, in terms of number of customers.

Comment 71 (Maine Community Action Association ; Other/Unknown in NE)

Module 4: No Comment

Comment 72 (Massachusetts Community Action Agency Planners' Group; State Association in MA)

Module 4: · Module 4, Section A: Group had concerns and questions around the benefit of trying to collect characteristics specifically on "new" clients. How will this information be used? Creating an

accurate report would be very challenging. Often clients who appear “new” had already been receiving services through another CAA and have moved, or were previously included in a different household, or may have participated in another program previously, which might not be identified due to database and data sharing limitations.

· Module 4, Section B: As previously expressed, the group has concerns around obtaining an accurate unduplicated count and robust characteristics for all individuals and households served. A great investment in data housing and management would be required in order to resolve issues around different databases not currently “speaking” to one another; even if provided with the funding and capacity necessary to solve these issues, different funders and partners who “own” data are not always willing or able to share that data across programs/partners.

Comment 73 (Maui Economic Opportunity Inc. ; Other/Unknown in HI)

Module 4: No Comment

Comment 74 (Merced County Community Action Agency ; Other/Unknown in CA)

Module 4: No Comment

Comment 75 (Michigan Community Action ; Eligible Entity/Local Agency in MI)

Module 4: 1. Module 4: Remove the Characteristics for NEW Individuals and Households Report. This report has no practical utility at the local level given the time and expense to create it at each local agency. This is not necessary for agency performance, and the intentions outlined by OCS for its use are not reflective of how local agencies and states look at their communities to assess needs, develop programs, and report progress. Unless clients could be enrolled in federal and state programs for multiple years, the designation is unnecessary.

-It also lacks utility at the state level given that data such as this rolled up to the state level will be skewed by large population centers like Detroit or Grand Rapids and decrease the practical utility of the data even further. Defining an individual or family as new becomes challenging when they may receive different services over many years (e.g. Early Head Start, child care, after school programs, youth programs, job training, WIC, food boxes, LIHEAP, etc.) and when the expectation is that eligibility is re-determined annually.

Module 4: Remove the Stability Indicators. The indicators selected and included in the clearance package are not practical when reporting customers stabilized as a result of the eligible entity's work. One option duplicates data already collected and the second uses a tool that defines financial stability that is statistically incompatible with where income eligible clients begin their journey out of poverty.

Module 4 - Individual and Family Level: (pages 51-75)
No Comments

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

1. 2. Remove this report in its entirety. It is not necessary for the proper performance of the functions of the agency, and when rolled up to the state, the information has no practical utility. At a state level it will be misinterpreted and can be influenced by what happens in larger population centers. Two further points illustrate this issue. First, the Characteristics report is of little use to determine if the agency is responding to needs identified in its community assessment. Demographic data alone does not identify the needs the new customers may have and is therefore of limited utility in comparison to data about individual, family, and community needs. Second, since several core CAA programs (e.g. LIHEAP) have a large number of new customers with limited or one time contact with the agency, demographic data collected from the "low touch" services would confuse meaningful analysis of demographic trends. Third, many CAAs have to rely on data collected by their partners and grantees (in the case of public agencies), many of whom may have limited capacity to collect demographic data for new individuals and households. Fourth, there are many practical problems to identifying who constitutes a new customer or household which also constitutes an additional data collection burden on staff.

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

I. 2. Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required. Local entities are not provided funding to track those receiving services for that period of time, leading to an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Many of the data collection systems used by agencies also simply lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.

Remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, "The following outcome indicators answer the following commonly asked question: How many people (or families) are 'better off/lives improved' because of CAAs work?" The first option is duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau's Financial Well-Being Scale relies on assumptions and definitions about what constitutes "well-being" drawn from the general population. This will result in the collection of data of limited utility for two reasons. First, compared to what constitutes financial well-being as defined by working and middle class Americans, the large majority of agency customers will be at the lowest end of the scale, meaning there will be little variance in the data to allow for meaningful comparison. Second, what constitutes successful outcomes for most agency customers would only result in slight changes on the scale. For example, doubling savings from \$50 to \$100 a month would be represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. In short, the scale is an inappropriate measure and will not result in the collection of useful data.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67) Remove this statement from the data collection form: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The timeframe of 90 days is included to allow agencies with current limited capacity to report on this timeframe and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking). This sweeping statement leads the reader to believe the future expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies. It should be edited to clearly state this is

limited to Workforce Investment and Opportunity Act (WIOA) activity.

Comment 76 (Minnesota Community Action Partnership; State Association in MN)

Module 4: Individual and Family Level

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

- Remove this report in its entirety. It is not necessary for the proper performance of the functions of the agency, and when rolled up to the state, the information has no practical utility. At a state level it will be misinterpreted and can be influenced by what happens in larger population centers.

- These further points illustrate this issue. First, the Characteristics report is of little use to determine if the agency is responding to needs identified in its community assessment. Demographic data alone does not identify the needs the new customers may have and is therefore of limited utility in comparison to data about individual, family, and community needs. Second, since several core CAA programs (e.g. LIHEAP) have a large number of new customers with limited or one time contact with the agency, demographic data collected from the “low touch” services would confuse meaningful analysis of demographic trends. Third, many CAAs have to rely on data collected by their partners and grantees (in the case of public agencies), many of whom may have limited capacity to collect demographic data for new individuals and households. Fourth, there are many practical problems to identifying who constitutes a new customer or household which also constitutes an additional data collection burden on staff while simultaneously further eroding any public policy value from aggregated data.

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

- Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) requirements. Local entities are not provided funding to track those receiving services for that period of time, leading to an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Many of the data collection systems used by agencies also simply lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.

- Remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, “The following outcome indicators answer the following commonly asked question: How many people (or families) are 'better off/lives improved' because of CAAs work?” The first option is duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau’s Financial Well-Being Scale relies on assumptions and definitions about what constitutes “well-being” drawn from the general population. This will result in the collection of data of limited utility for two reasons. First, compared to what constitutes financial well-being as defined by working and middle class Americans, the large majority of agency customers will be at the lowest end of the scale, meaning there will be little variance in the data to allow for meaningful comparison. Second, what constitutes successful outcomes for most agency customers would only result in slight changes on the scale. For example, doubling savings from \$50 to \$100 a month would be represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. In short, the scale is an inappropriate measure and will not result in the collection of useful data.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

· Remove this statement from the data collection form: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking). This sweeping statement leads the reader to believe the future expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies. It should be edited to clearly state this is limited to Workforce Investment and Opportunity Act (WIOA) activity.

Comment 77 (Minnesota Valley Action Council, Inc. ; Eligible Entity/Local Agency in MN)

Module 4: Module 4 - Individual and Family Level: (pages 51-75)

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

This data is going to be skewed by large programs such as LIHEAP. Just by volume alone, those seeking this program vs. others are going to impact data.

It would be helpful to have a definition of “New”

I see what you are getting at with trying to collect his data, I’m just not sure you are going to get the data you are really looking for unless you can break it down by program or service the individual is seeking. Local agencies can gather this information more as part of a needs assessment, which would be more helpful, rather than national reporting.

Module 4, Section B: All Characteristics Report: (page # 53-54)

I question the reason for reporting total number of individuals not included – will this have negative impact on the agency? Can an agency choose not to complete this report since other areas of the report are optional based on information available?

Module 4, Section C: Individual and Family NPIs: (page # 55)

I have already commended on % being a figure we should not use.

Many of these are subjective – “improved positive approaches towards learning”, “improve home environments,” “improved basic education” – I would recommend this improvement be measured in some way or eliminated from the report. Again, this lacks reliability in reporting.

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

Income and asset building: “# individuals who increased their savings” – by what? \$1? \$1000? – This doesn’t tell us anything without more specifics or ranges. Health and Social/Behavioral Development: #2, 3, 4, 5 are extremely subjective, difficult to measure, and are moving targets. You can improve mental health and then have a setback – so do we report this as a success or not?

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67) Stability is difficult to assess. #1 is now duplicating earlier reporting numbers.

Module 4, Section D: Individual and Family Services: (page # 68-75)

Comment 78 (Missouri agency Inc. ; Other/Unknown in MO)
<p>Module 4 - Individual and Family Level: (pages 51-75)</p> <p>Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52) I believe that the Characteristics for NEW Individuals and Households Report should not be used. It is meaningless data, and has no practical utility for our agency. I do not know how using this basic demographic data will help our agency to determine that we are meeting our customer's needs. It does not show the impact of our programs in any way.</p> <p>Also, defining an individual, or family as "new" is extremely difficult. Many of the families we work with are on a continuing basis from year to year, and may receive many different services, such as LIHEAP, Head Start, Housing, etc. So, for those families and individuals we serve over time, how would we define "new"? This information is not needed in any way at our agency, and will just be another financial burden considering the time and expense it will take to compile.</p> <p>Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67) In Missouri, we already use the MO Family Self-Sufficiency Scales (FSS Scales) to assess our customers increase in stability. I believe that the FSS Scales can be revised to include more information in order to meet the reporting requirements for Stability #2. This would be a much more cost effective solution for our state network, rather than using an additional scale.</p>
Comment 79 (Missouri Community Action Network (Can); State Association in MI)
<p>Module 4: - Individual and Family Level: (pages 51-75)</p> <p>Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52) · T/TA may be needed to ensure proper collecting of information, including clarity around the definition of "new". How will this data be used?</p> <p>Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57) · These make sense, but could still be condensed some. Not sure if the general ones, such as Education #6 or Civic Engagement #1c, are necessary as NPIs, but possibly just local indicators.</p> <p>Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67) · The planning accuracy percentage does not seem necessary for the annual report, but is good for local evaluation. This would also be a need for T/TA so agencies know how to do this correctly and improve targeting.</p> <p>· The 180 day follow-up was somewhat of a concern, but the Missouri State CSBG Administration has implemented an extended case management option for FY17 to assist CAAs with following clients. This allows for case management services to continue with clients who have exceeded 125% of poverty for up to 2 years to help with maintenance of outcomes and stability. Even so, T/TA emphasis may be needed on continued engagement and client follow-up.</p> <p>· Page 67: Stability, #2 – In Missouri, we use the Missouri Family Self-Sufficiency Scale which already includes a subscale on income that we could revise slightly to get more direct information for this</p>

indicator. We would propose the option to do this rather than use an additional scale.
Comment 80 (Montgomery County Community Action Development Commission; Other/Unknown in PA)
Module 4: No Comment
Comment 81 (Multi-Service Center (MSC) ; Eligible Entity/Local Agency in WA)
Module 4: mission of CAAs in our communities. Furthermore, our agency like many other agencies throughout our state and, I would surmise, throughout the country, does not currently have the capacity to provide a truly unduplicated number of people receiving services by domain. Many of our services such as energy assistance and housing/homeless services have separate data reporting systems in our area.
Comment 82 (National Association For State Community Service Program ; Other/Unknown in N/A)
<p>Module 4: 6. Module 4</p> <p>a. Section A, Characteristics for NEW Individuals and Households: NASCSP recommends eliminating this report.</p> <p>b. Section C, NPIs Tracking 90 and 180 days: The proposed indicators tracking outcomes for 90 and 180 days should remain in the CSBG Annual Report, however the instruction and guidance for these indicators should be modified. The instructions should clearly state that CAAs are only expected to report on these outcomes if tracking these indicators is already a part of programs that are designed specifically to include follow up.</p> <p>c. Section C, Stability Measures: NASCSP recommends dropping Stability Measure #2.</p> <p>Module 4 – Individual and Family Level</p> <p>NASCSP supports the majority of the modifications made to Module 4. Specifically, NASCSP values the separation of outputs and outcomes into the respective Services Report and NPI Report as this will promote better analysis of the connection between services and outcomes. While we support the general framework of Module 4, there are concerns related to the Characteristics for NEW Individuals and Households Report, the inclusion of an Other Outcome Indicator, and the proposed Stability Measures.</p> <p>Characteristics for NEW Individuals and Households Report: NASCSP recognizes the importance of capturing characteristic and demographic data on new individuals and households served by local agencies. There are concerns related to CAA’s ability to define and identify new participants, database and system capacity, and the utility of this data at the State and National Level. In other words, since there is such broad variance in agency client tracking and data collection systems across the CSBG Network, this report will only be as reliable as the systems of the CAA completing it. Based on complexities identified by the CSBG Network and NASCSP board, NASCSP recommends this report be removed from the packet and, with adequate funding and technical support in place, phased in at a later date. This recommendation is based on the concerns raised by the CSBG Network related to the</p>

feasibility of this report at this point in time. We recommend that this be reconsidered during the next OMB Clearance process.

National Performance Indicators Tracking Outcomes for 90 and 180 Days: NASCSP acknowledges that the indicators intended to track progress over 90 and 180 days are valuable in appropriate programs and circumstances. However, not all programs are designed with follow up in mind and/or follow up is not a feasible approach. The current instructions state “The time frame of 90 days is included to allow agencies with current limited capacity to report on this same time frame and to encourage quarterly review of data. The expectation is that CAAs will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. Longitudinal tracking)”. NASCSP recommends modifying the instructions to make it clear that tracking information will not be required for any CAAs and that the report forms provide a place for capturing follow up where it is appropriate. Specifically, NASCSP recommends striking the statement “The expectation is that agencies will eventually report on the 180 day indicator”.

Other Outcome Indicator: The Community Level NPIs include an option to add an Other Outcome Indicator. This allows for greater flexibility in reporting and creates opportunity to capture the vast range of outcomes achieved. NASCSP recognizes the addition of an Other Outcome Indicator will require a greater level of training and technical assistance, but believes the addition of an Other Outcome Indicator option in Module 4 will ensure flexible reporting around outcomes achieved that are not captured in the standard set of indicators. In the current CSBG IS Survey, CAAs have the opportunity to report on an Other indicator. To date, this has not caused any significant challenges in the CSBG IS Survey, and is a helpful method of identifying new ways CAAs are addressing their work.

Stability Indicators: The proposed Stability Measure #2 measures outcomes related to financial well-being based on responses to the CFPB Financial Well Being Scale. While this is a tested and validated scale, NASCSP does not believe that financial well-being is an appropriate national measure for measuring stability. Stability is more complex and encompasses more than financial or economic stability alone. Additionally, the set of questions, while validated and accepted, are not questions that accurately represent the typical experiences of individuals and families living at or below the poverty line. NASCSP recommends this be removed from the annual report and encouraged as a resource tool for agencies to use at the local level at their own discretion.

Comment 83 (National Community Action Foundation ; Eligible Entity/Local Agency in N/A)

Module 4: • The individual and family indicators of success, that have been clarified, are not fundamentally changed. They will continue to be flawed because of the simplistic agency information systems that we believe would have been a better focus for “next-generation” upgrades. about the “new participant” characteristics: In our April comments, we expressed concern that the data required will be difficult to validate, to store and has no practical application for making comparisons related to CAA performance, a concern shared by the Community Action Partnership. OCS provided additional explanations about this new report in a July 6 webinar stating, in summary:

There is no intention for the data on each year’s cohort of new participants to be used as “before” data to contrast to the same participants’ demographic characteristics at the end of their participation in CAA programs.

OCS clarified, instead it is:

1. A tool to allow local agencies to compare their year-to-year entrants' characteristics, situation and needs, and to understand, through a time series analysis, trends in local residents' needs. Then, CAAs can compare those trends in 'needs' to the priorities they identified in their Community Needs Assessment or perhaps compare them to the priority populations and activities of their strategic and annual plans. In other words, OCS explained the new participant's data should be used to see whether the CAA recruited the populations and individuals of greatest concern based on their Community Needs Assessment.

2. Or, it can be used as a record of the trends in conditions of poverty, which would allow the agency to track one year's entrants against past or subsequent years and determine whether any observed evolution tracked their Community Needs Assessment. The CSBG data systems in place today cannot be the source of reliable data for a next generation of reports. There are significant weaknesses in the current CSBG information system reports as a result of the disaggregated nature of local information systems and their lack of "Big Data" capacity. Those weaknesses will simply carry from the current reports into the new system's reports. For example, the demographic snapshot, provided in section G of current reports and Module 2 of the proposed report, is made up of the data from the most recent encounter with the participant during the year reported, as opposed to over a brief interval of time, as is the practice in the Census. Maintaining unique family identifiers for several related people is a special challenge. Community Action Agencies are positioned at the intersection of many domestic programs, including private, state and local initiatives. Thus, CAAs' method of achieving change for individuals, families and communities depends on integrating and sequencing different services and investments. The funders of those investments, whether public or private, typically have their own customized reporting system, including their own customized data requirements and identifiers for participants. In other words, CAAs typically report to numerous funders about the same participant or project. This means CAAs must coordinate multiple funding sources for various purposes and combinations of partners, each of which has its own tracking requirements for the same participants or project.

Today, much of the participant or project tracking by CAA staff occurs by way of traditional narrative files. In order to create an unduplicated tracking of one individual or family, agency professionals struggle to disentangle and integrate across the records for a family or project entered in different systems. They then write down much of the details they will need to track progress and needs. Every data requirement attached to investments a CAA administers must be reconciled with multiple other reports on the related investments, and only the local agency can manage the combinations for which it is responsible.

For most participants, CSBG only funds the facility to which they come, the professional coordinating the program and the staff managing data. ROMA NG, properly executed, requires that each individual's file stores data on the contacts and nature of services in the format required by the CSBG report, as well as in the other formats required by all the other funders. Integrating this information requires software and operations that select information in different funder databases and transfer it to a central file. Such software operations are generally known as data warehouse management, which involves a higher level of IT skill than most individual agencies or state associations possess.

Comment 84 (National Community Partnership ; Other/Unknown in ND)

Module 4:

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

- Remove this report in its entirety. It is not necessary for the proper performance of the functions of the agency, and when rolled up to the state, the information has no practical utility. At a state level it will be misinterpreted and can be influenced by what happens in larger population centers.

- Two further points illustrate this issue. First, the Characteristics report is of little use to determine if the agency is responding to needs identified in its community assessment. Demographic data alone does not identify the needs the new customers may have and is therefore of limited utility in comparison to data about individual, family, and community needs. Second, since several core CAA programs (e.g. LIHEAP) have a large number of new customers with limited or one time contact with the agency, demographic data collected from the “low touch” services would confuse meaningful analysis of demographic trends. Third, many CAAs have to rely on data collected by their partners and grantees (in the case of public agencies), many of whom may have limited capacity to collect demographic data for new individuals and households. Fourth, there are many practical problems to identifying who constitutes a new customer or household which also constitutes an additional data collection burden on staff.

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

- Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required. Local entities are not provided funding to track those receiving services for that period of time, leading to an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Many of the data collection systems used by agencies also simply lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.

- Remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, “The following outcome indicators answer the following commonly asked question: How many people (or families) are 'better off/lives improved' because of CAAs work?” The first option is duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau’s Financial Well-Being Scale relies on assumptions and definitions about what constitutes “well-being” drawn from the general population. This will result in the collection of data of limited utility for two reasons. First, compared to what constitutes financial well-being as defined by working and middle class Americans, the large majority of agency customers will be at the lowest end of the scale, meaning there will be little variance in the data to allow for meaningful comparison. Second, what constitutes successful outcomes for most agency customers would only result in slight changes on the scale. For example, doubling savings from \$50 to \$100 a month would be represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. In short, the scale is an inappropriate measure and will not result in the collection of useful data.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

- Remove this statement from the data collection form: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking). This sweeping statement leads the reader to believe the future

expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies. It should be edited to clearly state this is limited to Workforce Investment and Opportunity Act (WIOA) activity.

Comment 85 (Nek-Cap, Inc. (Northeast Kansas Community Action Agency); Eligible Entity/Local Agency in KS)

Module 4: Module 4 Sections A-D would require a significant amount of staff resources due to the longer term follow up. However, I do concur it is the most accurate method of documenting individual and family outcomes associated with the direct result of CSBG interventions. This would necessitate significant consumer cooperation and self-reporting and/or a system for verification through external sources in order to document specific outcomes. The current CAP 60 software system does have the capacity to capture such information.

Comment 86 (New England Community Action Partnership (NECAP) ; State Association in CT)

Module 4: Module 4 – Individual and Family Level: (pages 51-75)

- Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52) o Remove this report in its entirety. It is not necessary for the proper performance of the functions of the agency, and when rolled up to the state, the information has no practical utility. At a state level it will be misinterpreted and can be influenced by what happens in larger population centers.

- Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57) o Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Many of the data collection systems used by agencies also simply lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.

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Comment 87 (New York Department Of Youth And Community Development ; State in NY)

Module 4: Module 4, Section A:

1. We recommend transforming “Gender” into two separate variables, rather than just adding an “Other” category to the existing variable. We suggest one “Sex” variable, wherein the participant can select between female and male (based on biological status at birth); and one “Gender” category, wherein the participant can select or write in a category based on their sense of self or self-identity.

2. For Household Size, reinstate use of “Seven” and “Eight or more” as discrete categories, rather than collapse them into “Six or more” category.

3. Define “Other permanent housing” category under Housing variable.

Module 4, Section D:

1. Requiring an unduplicated count of participants per activity, program, or service listed in this module is confusing. There are many scenarios in which participants can partake in multiple programs (thereby receiving more than one activity listed) and/or one program can provide multiple types of activities. In these instances, decision-making on how to count participants would be arbitrary, rather than illustrative of service provision.

Comment 88 (New York State Community Action Association; Eligible Entity/Local Agency in NY)

Module 4: Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

· This report should be removed as it does nothing to contribute to the critical function of a CAA and when aggregated on the state level, provides no useful information Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

· Except when required by the Workforce Investment and Opportunity Act (WIOA), the indicator for 180 days should be removed in all sections. It is difficult if not impossible to track most customers for that period of time and there is therefore little value to asking CAAs to go to the time and expense required for such long term data collection.

· The Stability Indicators should be removed as they do little to help answer the question of whether people’s lives are improved because of the services received from a CAA. Because the majority of CAAs customers have very low incomes, the improvements they make would not be significant as

measured by the suggested tools and scales and the most commonly used measures of financial well-being are based on the general population and therefore are not relevant to the experiences of the low income people who are served by CAAs.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

· The statement that 180 day tracking is the standard agencies should work toward should be removed. This statement strongly indicates that this will be the expectation in the future, an unrealistic and unproductive goal with the exception of Workforce Investment and Opportunity Act (WIOA) activity.

Comment 89 (Ninth District Opportunity, Inc.; Eligible Entity/Local Agency in GA)

Section A: Characteristics for NEW Individuals and Households: (page # 52)

The logistics of properly capturing short/long-term unemployment are likely to be a burden on intake workers. While this could be a case management talking point, it is not a necessary data field for all clients.

Module 4, Section B: All Characteristics Report: (page # 53-54)

The logistics of properly capturing short/long-term unemployment are likely to be a burden on intake workers. While this could be a case management talking point, it is not a necessary data field for all clients. Capturing "VA service related" vs. "non service related" will be difficult for intake workers and is not necessary for national aggregation. Otherwise, the new elements are very nice.

Module 4, Section C: Individual and Family NPIs:

Domains should be numbered in alignment with CSBG expenditure categories. Every NPI category should have a direct link to a CSBG expenditure category/service category. Every service/strategy should be able to be linked to an outcome. While it is understood that the goal of the network is to focus on long-term change, outcomes should exist that coincide with the strategies listed under Support services. Each NPI needs to be provided with a unique identifier for consistent tracking purposes.

There should be an indicator to track increased unearned income (child support, disability, etc.). There should be an indicator to document improved employment skills for adults, not just youth.

Comment 90 (North Central Community Action Program; Eligible Entity/Local Agency in WI)

Module 4: -Tracking people for 180 days seems way out of the realm of anything that we could manage. In some cases a contact with us is time limited.

-Tracking people who are "new" doesn't seem to serve a purpose. It also could imply that we are trying to appease people who think community action only serves the same people over and over. I feel like there is a value judgement buried in there somewhere.

Comment 91 (North Dakota Community Action ; State Association in ND)

Module 4: Module 4 - Individual and Family Level: (pages 51-75)

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

Remove this report in its entirety. It is not necessary for the proper performance of the functions of the agency, and when rolled up to the state, the information has no practical utility. At a state level it will be misinterpreted and can be influenced by what happens in larger population centers.

Two further points illustrate this issue. First, the Characteristics report is of little use to determine if the agency is responding to needs identified in its community assessment. Demographic data alone does not identify the needs the new customers may have and is therefore of limited utility in comparison to data about individual, family, and community needs. Second, since several core CAA programs (e.g. LIHEAP) have a large number of new customers with limited or one time contact with the agency, demographic data collected from the "low touch" services would confuse meaningful analysis of demographic trends. Third, many CAAs have to rely on data collected by their partners and grantees (in the case Of public agencies), many Of whom may have limited capacity to collect demographic data for new individuals and households. Fourth, there are many practical problems to identifying who constitutes a new customer or household which also constitutes an additional data collection burden on staff.

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57) Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required. Local entities are not provided funding to track those receiving services for that period of time, leading to an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Many of the data collection systems used by agencies also simply lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst. Remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, "The following outcome indicators answer the following commonly asked question: How many people (or families) are 'better off/lives improved' because of CAAs work?" The first option is duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau's Financial Well-Being Scale relies on assumptions and definitions about what constitutes "well-being" drawn from the general population. This will result in the collection of data of limited utility for two reasons. First, compared to what constitutes financial well-being as defined by working and middle class Americans, the large majority of agency customers will be at the lowest end of the scale, meaning there will be little variance in the data to allow for meaningful comparison. Second, what constitutes successful outcomes for most agency customers would only result in slight changes on the scale. For example, doubling savings from \$50 to \$100 a month would be represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. In short, the scale is an inappropriate measure and will not result in the collection of useful data.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67) o Remove this statement from the data collection form: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking). This sweeping statement leads the reader to believe the future expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies. It should be edited to clearly state this is limited to Workforce Investment and Opportunity Act (WIOA) activity. If there are any questions about

the submitted, please contact me via email: andrea@capnd.org

Comment 92 (North Dakota Department Of Commerce; State in ND)

Module 4:

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

- Remove this report in its entirety. It is not necessary for the proper performance of the functions of the agency, and when rolled up to the state, the information has no practical utility. At a state level it will be misinterpreted and can be influenced by what happens in larger population centers.

- The Characteristics report is of little use to determine if the agency is responding to needs identified in its community assessment. Demographic data alone does not identify the needs the new customers may have and is therefore of limited utility in comparison to data about individual, family, and community needs.

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

- Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required. Local entities are not provided funding to track those receiving services for that period of time, leading to an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Many of the data collection systems used by agencies also simply lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.

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Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

- Remove this statement from the data collection form: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where

appropriate (i.e. longitudinal tracking). This sweeping statement leads the reader to believe the future expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies. It should be edited to clearly state this is limited to Workforce Investment and Opportunity Act (WIOA) activity.

Comment 93 (North Dakota Lead Agency; State in ND)

Module 4: Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

- Remove this report in its entirety. It is not necessary for the proper performance of the functions of the agency, and when rolled up to the state, the information has no practical utility. At a state level it will be misinterpreted and can be influenced by what happens in larger population centers.

- The Characteristics report is of little use to determine if the agency is responding to needs identified in its community assessment. Demographic data alone does not identify the needs the new customers may have and is therefore of limited utility in comparison to data about individual, family, and community needs.

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

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- Remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, “The following outcome indicators answer the following commonly asked question: How many people (or families) are ‘better off/lives improved’ because of CAAs work?” The first option is duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau’s Financial Well-Being Scale relies on assumptions and definitions about what constitutes “well-being” drawn from the general population. This will result in the collection of data of limited utility for two reasons. First, compared to what constitutes financial well-being as defined by working and middle class Americans, the large majority of agency customers will be at the lowest end of the scale, meaning there will be little variance in the data to allow for meaningful comparison. Second, what constitutes successful outcomes for most agency customers would only result in slight changes on the scale. For example, doubling savings from \$50 to \$100 a month would be represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. In short, the scale is an inappropriate measure and will not result in the collection of useful data.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

- Remove this statement from the data collection form: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where

appropriate (i.e. longitudinal tracking). This sweeping statement leads the reader to believe the future expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies. It should be edited to clearly state this is limited to Workforce Investment and Opportunity Act (WIOA) activity.
Comment 94 (Northeast Kansas Community Action Agency; Eligible Entity/Local Agency in KS)
<p>Module 4: Module 4 - Individual and Family Level:</p> <p>Module 4 Sections A-D would require a significant amount of staff resources due to the longer term follow up. However, I do concur it is the most accurate method of documenting individual and family outcomes associated with the direct result of CSBG interventions. This would necessitate significant consumer cooperation and self-reporting and/or a system for verification through external sources in order to document specific outcomes. The current CAP 60 software system does have the capacity to capture such information.</p>
Comment 95 (Northeast Pennsylvania Community Action Agency; Other/Unknown in PA)
<p>Module 4: While the Community Services Block Grant (CSBG) Annual report serves the purpose of reporting the outstanding accomplishments of agencies, entities, associations and partnerships, one critical area is missing, emergency services. An emergency is defined as an unexpected or difficult situation, which happens suddenly and which requires an expedited response. In the state of Pennsylvania 40 of the 41 Community Action Agencies administer programs that directly relate to providing emergency services. These emergency services include but are not limited to, emergency sheltering, emergency food, emergency rent/mortgage assistance, and emergency heating assistance. Often times those cases that require immediate, emergency services are one time assistance. These difficult and frequent cases will not have a 90 or 180 day outcome as the resolution, in most cases, is immediate. This is of concern, as agencies will not have the opportunity to report an outcome on these countless individuals, children and families who face difficult daily challenges that require immediate intervention.</p>
Comment 96 (Northern Tier Community Action Corp. ; Eligible Entity/Local Agency in PA)

MODULE 4- ENTIRE COMMENT

Module 4: Module 4, Section A: Characteristics for NEW Individuals and Households: (Page # 52)
Is there a real value in tracking characteristics of new individuals and households vs. tracking characteristics already being tracked?

Module 4, Section B: All Characteristics Report: (page 53-54)
No Comment

Module 4, Section C: Individual and Family NPIs: (page 55)
No Comment

Module 4, Section C: Individual and Family Landing page: (page 55-57)
Section asks us to report on outcomes at 180 days. It is often difficult even to report on client outcomes at 90 days out. Many of the client services are provided over 30 — 60 - 90 day period of time and we may never see the client again. To follow-up with that client at 180 days out is going to take time away from the case manager working with additional clients.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page 56-67)
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Module 4, Section D: Individual and Family Services: (page 68-75) No Comment

Comment 98 (NORWESCAP; Eligible Entity/Local Agency in NJ)

Module 4: No Comment

Comment 99 (Northeast Community Action Agency ; Other/Unknown in FL)

Module 4: Module 4 - Individual and Family Level: (pages 51-75)

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

The Characteristics for NEW Individuals and Households poses the most concerns will probably be the most burdensome and concerning section. Several concerns include:

- * System updates to capture the new data (cost and programming issues)
- * Staff training to accurately collect the data.
- * Additional resources to collect and quality review the data.
- * Data will not provide agencies with valid, reliable, and useful data.

Module 4, Section B: All Characteristics Report: (page # 53-54)

No Comment: Minor changes to data already being collected by most agencies that have client tracking systems.

Module 4, Section C: Individual and Family NPIs: (page # 55)

No Comment

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

Living Wage Outcomes should be removed as few communities have established living wages and there is no consistency to this outcome. Stability indicators should be deleted and re-worded.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

Tracking outcomes for 180 would add an additional burden on agency staff with limited resources.

Comment 100 (Nothing Compares; Other/Unknown in NC)

Module 4: Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

Consider including "total unduplicated number of all individuals about whom no characteristics were obtained" and "total unduplicated number of all households about whom no characteristics were obtained". Based on the 2014 CSBG Annual Report, the number individuals whom no characteristics were obtained accounted for 20% of the 15.7 million individuals reported. The number families whom no characteristics were obtained accounted for 15% of the 6.7 million families reported. Agencies in NC have indicated some funding sources prohibit characteristics from being obtained. Omitting these items may hinder full analysis and result in the appearance of less individuals/ households being served than actually were. Further, past data collected indicates serving individuals and households for which characteristics are not obtained is part of the community action story documenting services rendered.

It should be noted that there will be challenges and a lack of consistency with defining, identifying and tracking new participants.

Module 4, Section B: All Characteristics Report: (page # 53-54)

Remove all items that indicate an estimated number of individuals and families not included in this report. There is no defined purpose for nor a way to validate this information.

Module 4, Section C

Remove "The expectation is that agencies will eventually report on the 180 day indicator" and modify the instructions to state that tracking information will not be required for any CAA and that the report forms provide a place for capturing follow up where it is appropriate. Other general points are as follows:

- L Under the current annual report structure, local agencies have 5 report sections in which they may report. Under the proposed annual report structure, local agencies have at least 9 sections in which they may report. ROMA Next Gen should make every effort possible to streamline reporting and decrease opportunities for misreporting. The accuracy and ultimately quality of information gathered in the proposed report is questionable as no single, agency-wide data collection software has been offered as a model for combining all community action programs for tracking to meet the requirements of this report with unduplicated information. Should such a system exist, agencies would likely need additional funding to supplement the related expense.

- L The estimated burden associated with completing this Annual Report is likely underestimated because of the unknown variables and significant increase in information collected. u- North Carolina continues to advocate for a National Goal that clearly links the Network's effort to eliminate poverty since the primary purpose of CSBG is poverty reduction, community revitalization and empowerment of families to become self-sufficient as indicated in current legislation. Specifically, we recommend a national goal that speaks to poverty reduction that defines what poverty is and is ultimately linked to performance indicators representing family level movement up the % of poverty income scale.

North Carolina's Office of Economic Opportunity believes that the state's administrative oversight is the linchpin for successful CSBG operations and has been active on all workgroups in expressing feedback for every effort supporting the Performance Management Framework. It is our hope that NC's experience, expertise and commitment to ensuring that low-income families have access to best available resources through CSBG will be given consideration as ROMA Next Gen is vetted and finalized. We further believe that NASCSP has a reputable history of progressive leadership, qualified and committed staff and a track record of demonstrated effectiveness in performance with ROMA and other CSBG Training and Technical Assistance efforts. Therefore, we further hope that OCS will accept final recommendations from NASCSP as to what will best depict the work of the CSBG network. Together, we are confident that we will achieve the desired breakthrough results and demonstrate accountability and transparency while stewarding the resources obtained through the Community Services Block Grant.

Comment 101 (Ohio Association Of Community Action Agencies; Other/Unknown in OH)

Module 4: No Comment

Comment 102 (Opportunities For Otsego, Inc. ; Other/Unknown in NY)

Module 4: Module 4, Section A: Characteristics for NEW Individuals and Households:

- Remove this report in its entirety. It is not necessary for the proper performance of the functions of the agency, and when rolled up to the state, the information has no practical utility. At a state level it will be misinterpreted and can be influenced by what happens in larger population centers.

- Two further points illustrate this issue. First, the Characteristics report is of little use to determine if the agency is responding to needs identified in its community assessment. Demographic data alone does not identify the needs the new customers may have and is therefore of limited utility in comparison to data about individual, family, and community needs. Second, since several core CAA programs (e.g. LIHEAP) have a large number of new customers with limited or one time contact with the agency, demographic data collected from the “low touch” services would confuse meaningful analysis of demographic trends. Third, many CAAs have to rely on data collected by their partners and grantees (in the case of public agencies), many of whom may have limited capacity to collect demographic data for new individuals and households. Fourth, there are many practical problems to identifying who constitutes a new customer or household which also constitutes an additional data collection burden on staff. Module 4, Section C: Individual and Family NPI Landing Page:

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Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

- Remove this statement from the data collection form: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking). This sweeping statement leads the reader to believe the future

expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies. It should be edited to clearly state this is limited to Workforce Investment and Opportunity Act (WIOA) activity.
Comment 103 (Oregon Housing And Community Services ; Other/Unknown in OR)
Module 4: No Comment
Comment 104 (People Incorporated Of Virginia; Other/Unknown in VA)
Module 4: - Individual and Family Level: (pages 51-75)
<p>Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)</p> <p>Remove this report in its entirety. This report has no practical utility at the local level given the time and expense to create it at each local agency. This is not necessary for agency performance, and the intentions outlined by OCS for its use are not reflective of how local agencies and states look at their communities to assess needs, develop programs, and report progress. It also lacks utility at the state level given that data such as this rolled up to the state level will be skewed by large population centers and decrease the practical utility of the data even further. This agency -and many others- lack management information systems with the capacity to disaggregate this type of data from its overall customer database, so this would require a substantial change to client MIS systems.</p> <p>Finally, People Incorporated serves families over time, and with no definition of “new” being provided for review, staff will be unable to implement this report consistently. Defining an individual or family as new becomes challenging when they may receive different services over many years (e.g. Early Head Start, child care, after school programs, youth programs, job training, WIC, food boxes, etc.).</p> <p>Module 4, Section B: All Characteristics Report: (page # 53-54)</p> <p>No comment.</p> <p>Module 4, Section C: Individual and Family NPIs: (page # 55)</p> <p>No comment.</p> <p>Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)</p> <p>Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required. Local entities are not provided funding to track those receiving services for that period of time, leading to an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Many of the data collection systems used by agencies also simply lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.</p> <p>Remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, “The following outcome indicators answer the following commonly asked question: How many people (or families) are 'better off/lives improved' because of CAAs work?” The first option is duplicative effort to collect the data, and does not provide meaningful information.</p>

The second option uses a survey that is not specific to families with low incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau's Financial Well-Being Scale relies on assumptions and definitions about what constitutes "well-being" drawn from the general population. This will result in the collection of data of limited utility for two reasons. First, compared to what constitutes financial well-being as defined by working and middle class Americans, the large majority of agency customers will be at the lowest end of the scale, meaning there will be little variance in the data to allow for meaningful comparison. Second, what constitutes successful outcomes for most agency customers would only result in slight changes on the scale. For example, doubling savings from \$50 to \$100 a month would be represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. The scale is an inappropriate measure and will not result in the collection of useful data.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

Remove this statement from the data collection form: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking). This sweeping statement leads the reader to believe the future expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies. It should be edited to clearly state this is limited to Workforce Investment and Opportunity Act (WIOA) activity, or other programs that fund this follow-up.

Module 4, Section D: Individual and Family Services: (page # 68-75)

No comment.

Comment 105 (Proaction Of Steuben And Yates Inc.; Eligible Entity/Local Agency in NY)

Module 4: Individual and Family Level: (pages 51-75)

· No Comments

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

· Remove this report in its entirety. It is not necessary for the proper performance of the functions of the agency, and when rolled up to the state, the information has no practical utility. At a state level it will be misinterpreted and can be influenced by what happens in larger population centers.

· Two further points illustrate this issue. First, the Characteristics report is of little use to determine if the agency is responding to needs identified in its community assessment. Demographic data alone does not identify the needs the new customers may have and is therefore of limited utility in comparison to data about individual, family, and community needs. Second, since several core CAA programs (e.g. LIHEAP) have a large number of new customers with limited or one time contact with the agency, demographic data collected from the "low touch" services would confuse meaningful analysis of demographic trends. Third, many CAAs have to rely on data collected by their partners and grantees (in the case of public agencies), many of whom may have limited capacity to collect demographic data for new individuals and households. Fourth, there are many practical problems to identifying who constitutes a new customer or household which also constitutes an additional data collection burden on

staff.

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

- Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required. Local entities are not provided funding to track those receiving services for that period of time, leading to an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Many of the data collection systems used by agencies also simply lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.
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Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

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Comment 106 (Project Bravo; Eligible Entity/Local Agency in TX)

Module 4: population is made up of a high percentage of immigrants, many of them are not documented. In addition to having one of the poorest zip codes in the United States, we have isolated colonial communities and a large military base. It is very difficult to keep up with our very mobile population. Keeping current phone numbers and addresses has always been a challenge and we do our best to follow-up and document positive outcomes. The simpler the process for follow-up is, the more likely clients are to comply and provide information on a timely basis. I fear that our ability to report on outcomes will be compromised if we add more requirements and data points to gather. Our organization will have to designate people to work solely on gathering data rather than providing client services in order to comply with new requirements.

Comment 107 (Pueblo County Housing And Human Services; Other/Unknown in CO)

Module 4: Module 4: Individual and Family Level / Stated above

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
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 4: Module 4 - Individual and Family Level:

The capacity to collect unduplicated information on individuals and families in Section A and B is not within the technical or programmatic abilities of many CAAs due to the breadth of programs and operators providing the diverse range of services in local communities. The data collection systems either have conflicting ranges and confidentiality restrictions or do not interact at all. Specific technology upgrades to existing intake procedures and different individual client interactions would be required; this would result in significantly increased burden for information collection than anticipated in the proposed rule. The collection of this information is not necessary for the proper performance of the functions of the agency services.

In Section C, requiring eligible entities to determine and rate employment goals based on "living wage" (which will differ drastically in communities) will not have practical utility. This is due to a variety of factors but most importantly due to the number of days (given the expectation for reporting at 90 or 180 days) it is likely that the client may achieve employment out of the service area which may have

significantly different living wage. The expectation that entities would need to determine the living wage for every client that may leave the area to attain employment will require an abundant amount of time, far exceeding the expected burden listed currently in this rule. The proposed collection of information is not necessary for the proper performance of the functions of the agency services and presents undue financial and staff burdens

Furthermore, our organization feels that the requirement to report on outcomes for clients served broken out based on age (especially the children/youth categories) will be cumbersome and at times impossible due to differing reporting systems and requirements which are not funded by CSBG. Section C also asks to report on Civic Engagement which, while important overall, also requires intensive surveying in order to meet the new proposed requirements to show leadership skills, social networking and ability to engage; we recommend that "a-c" be eliminated due to that fact that this will significantly increase the time burden on reporting and not have practical utility. In addition, the final portion of this Section asks entities to utilize a client survey of financial well-being which is not viewed as an appropriate tool for many clients and an incomplete measure of this outcome.

Finally, in Section D the requirement for measuring unduplicated individuals meeting at least one of the NPI outcomes is not necessary for the proper performance of the functions of the agency services.

The capacity to collect Unduplicated information on individuals and families is not within the technical or programmatic abilities of many CAAs due to the breadth of programs and operators providing the diverse range of services in local communities. The data collection systems have conflicting ranges and confidentiality restrictions and/or do not interact at all. Specific technology upgrades to existing data collection procedures and different individual client interactions would be required; this would result in significantly more burden for information collection than anticipated in the proposed rule.

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

Module 4: If multiple characteristics reports are to be used, it makes more sense to include a pre/post document showing the progress made during program enrollment as it relates to employment, income, education level, etc. This makes more sense than the “new individual” report. The logistics of properly capturing short/long-term unemployment are likely to be a burden on intake workers and are completely unnecessary for national data aggregation.

Module 4, Section B

The new format is very nice. The logistics of properly capturing short/long-term unemployment are likely to be a burden on intake workers and are completely unnecessary for national data aggregation. Capturing “VA service related” vs “non service related” will be an unnecessary hardship on frontline staff members.

Module 4, Section C

Domains should be numbered and in alignment with CSBG expenditure categories. Every NPI category should have a direct link to a CSBG expenditure and service category. Every service/strategy should be able to be linked to an outcome. While it is understood that the goal of the network is to focus on long-term change, short-term outcomes should exist that coincide with the strategies listed under support services. Identifying which applicants obtain employment up to living wage vs. living wage and higher

will be an undue hardship on intake workers and could be measured by a pre/post characteristic report much easier. It is expected that this data will be inaccurate due to incorrect reporting, anyway. Each NPI should be assigned a unique identifying number for consisting tracking purposes. The number should align with service/expenditure categories. There should be an indicator to track increased unearned income (child support, disability, etc.) or other household resources that may increase economic stability. There should be an indicator to document improved employment skills for adults, not just youth.

Module 4, Section D

Apprenticeships and internships should include college internships and senior citizen employment programs, not just youth. “Home visits in the education section should be moved to a category where it can be used for all programs. It is not necessary to specifically track, on a national level, how many educational home visits were made as opposed to those for other programs. Financial capability skills training, financial coaching, and budgeting can be consolidated and defined on a local or state level. Too many options will confuse agency administrators and intake workers, resulting inconsistent (aka useless) data. Credit counseling and credit repair counseling can be consolidated and defined on a local level. Too many options will confuse agency administrators and intake workers resulting in inconsistent (useless) data. Financial capability skills training and financial coaching/counseling should not be in the housing section. While it is understood they can be related to housing indirectly (and other domains), this is contrary to ROMA principles. There should be an area to count non-prescription medical supplies. There should be a follow-up activity

There should be an “other” option for every service category.

Additional thoughts: States using certain software systems will not be greatly impacted, as they fully support ROMA implementation and can be easily in compliance with the new data fields. Other states may need to consider a transition to a new system. The national network should consider a standardized reporting format (similar to HMIS) that will allow for data fields to be easily mapped for aggregation on a national level. As software packages are available that meet the requirements at a very reasonable cost, the financial burden will be primarily in the training of staff to use a better tracking system. Further, many of the requirements that are included in the cost burden estimates have been mandated for more than 20 years. The cost burden to high performing organizations with an adequate tracking system will be very minimal.

A stronger emphasis should be made on an agency-wide unduplicated count for all programs.

Comment 110 (SEMCAC; Eligible Entity/Local Agency in MN)

No Comments

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

- Remove this report in its entirety. It is not necessary for the proper performance of the functions of the agency, and when rolled up to the state, the information has no practical utility. At a state level it will be misinterpreted and can be influenced by what happens in larger population centers. OR at the very least, clearly define the use of the word “new”. This page seems completely unnecessary. Consider providing it as an internal document for CAP agencies to utilize, should they so choose, for their annual reporting.

- First, the Characteristics report is of little use to determine if the agency is responding to needs identified in its community assessment. Demographic data alone does not identify the needs the new

customers may have and is therefore of limited utility in comparison to data about individual, family, and community needs. Second, since several core CAA programs (e.g. LIHEAP) have a large number of new customers with limited or one time contact with the agency, demographic data collected from the “low touch” services would confuse meaningful analysis of demographic trends. Third, many CAAs have to rely on data collected by their partners and grantees (in the case of public agencies), many of whom may have limited capacity to collect demographic data for new individuals and households. Fourth, there are many practical problems to identifying who constitutes a new customer or household which also constitutes an additional data collection burden on staff.

Module 4, Section B: All Characteristics Report: (page # 53-54)

- No Comments

Module 4, Section C: Individual and Family NPIs: (page # 55)

- No Comments

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

- Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required. Local entities are not provided funding to track those receiving services for that period of time, leading to an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Many of the data collection systems used by agencies also simply lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.

- Remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, “The following outcome indicators answer the following commonly asked question: How many people (or families) are ‘better off/lives improved’ because of CAAs work?” The first option is duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau’s Financial Well-Being Scale relies on assumptions and definitions about what constitutes “well-being” drawn from the general population. This will result in the collection of data of limited utility for two reasons. First, compared to what constitutes financial well-being as defined by working and middle class Americans, the large majority of agency customers will be at the lowest end of the scale, meaning there will be little variance in the data to allow for meaningful comparison. Second, what constitutes successful outcomes for most agency customers would only result in slight changes on the scale. For example, doubling savings from \$50 to \$100 a month would be represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. In short, the scale is an inappropriate measure and will not result in the collection of useful data.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

- Remove this statement from the data collection form: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking). This sweeping statement leads the reader to believe the future expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies. It should be edited to

clearly state this is limited to Workforce Investment and Opportunity Act (WIOA) activity.
Module Section D: Individual and Family Services: (page # 68-75) · No Comments
Comment 111 (South Plain Community Action Association ; State Association in TX)
Module 4: No Comment
Comment 112 (Southeastern North Dakota ; Eligible Entity/Local Agency in ND)
Module 4: Individual and Family Level: (pages 51-75)
<p>Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)</p> <ul style="list-style-type: none"> •Remove this report in its entirety. It is not necessary for the proper performance of the functions of the agency, and when rolled up to the state, the information has no practical utility. At a state level it will be misinterpreted and can be influenced by what happens in larger population centers. <p>Two further points illustrate this issue. First, the Characteristics report is of little use to determine if the agency is responding to needs identified in its community assessment. Demographic data alone does not identify the needs the new customers may have and is therefore of limited utility in comparison to data about individual, family, and community needs. Second, since several core CAA programs (e.g. LIHEAP) have a large number of new customers with limited or one time contact with the agency, demographic data collected from the "low touch" services would confuse meaningful analysis of demographic trends. Third, many CAAs have to rely on data collected by their partners and grantees (in the case of public agencies), many of whom may have limited capacity to collect demographic data for new individuals and households. Fourth, there are many practical problems to identifying who constitutes a new customer or household which also constitutes an additional data collection burden on staff.</p> <p>Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)</p> <p>Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required. Local entities are not provided funding to track those receiving services for that period of time, leading to an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Many of the data collection systems used by agencies also simply lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.</p> <p>Remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, "The following outcome indicators answer the following commonly asked question: How many people (or families) are 'better off/lives improved' because of CAAs work?" The first option is duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau's Financial Well-Being Scale relies on assumptions and definitions about what constitutes "wellbeing drawn from the general population. This will result in the collection of data of limited utility for two reasons. First,</p>

compared to what constitutes financial well-being as defined by working and middle class Americans, the large majority of agency customers will be at the lowest end of the scale, meaning there will be little variance in the data to allow for meaningful comparison. Second, what constitutes successful outcomes for most agency customers would only result in slight changes on the scale. For example, doubling savings from \$50 to \$100 a month would be represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. In short, the scale is an inappropriate measure and will not result in the collection of useful data.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

- Remove this statement from the data collection form: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The timeframe of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking). This sweeping statement leads the reader to believe the future expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies. It should be edited to clearly state this is limited to Workforce Investment and Opportunity Act (WIOA) activity.

Comment 113 (Southern New Hampshire Services ; Eligible Entity/Local Agency in NH)

Module 4: - Individual and Family Level: (pages 51-75)

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

The value in collecting this data for compilation at a national level seems dubious at best. If the purpose of this information is to determine at a national level how many “new” households utilize services at Community Action Agencies (CAAs) in a given program year, that says nothing about the worth or effectiveness of an agency. It also says nothing useful about the needs of the individuals and households at a national level. Additionally, it will in all likelihood not accurately measure new households. Families frequently utilize CAAs over a period of time which may span 2 or more years, depending on household composition, needs, and services accessed. Agencies and even some programs within agencies are likely to use different definitions of “new.” They may also have issues retrieving information from previous years to document when someone may have received services previously, depending on the capacity of their data collection and reporting system. All of this could lead to skewed and essentially useless information at the national level.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

A 180 day tracking period presents challenges to program resources, even those with sufficient case management resources in place. Tracking clients for 6 months naturally leads to a larger number of active cases at any one time, impacting staff and potentially impacting the quality of client contact for smaller staffs. The term “strive for” leaves the expectation of achieving that level of tracking in question. Is it a best practice that typifies the ideal, or is it a standard we should expect will be a requirement at some point in the future for more programs, and what would that look like?

Module 4, Section D: Individual and Family Services: (page # 68-75)

The purpose of the new Data Entry Forms and how they relate to the other sections of the report is unclear. They gather data on individuals served with no consideration of outcomes or context.

Comment 114 (Southwest Oklahoma Community Action ; Other/Unknown in OK)
Module 4: No Comment
Comment 115 (State Of North Carolina; State in NC)
Module 4: Module 4 — Individual and Family Level
<p>Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52) Consider including "total unduplicated number of all individuals about whom no characteristics were obtained" and "total unduplicated number of all households about whom no characteristics were obtained". Based on the 2014 CSBG Annual Report, the number individuals whom no characteristics were obtained accounted for 20% of the 15.7 million individuals reported. The number families whom no characteristics were obtained accounted for 15% of the 6.7 million families reported. Agencies in NC have indicated some funding sources prohibit characteristics from being obtained. Omitting these items may hinder full analysis and result in the appearance of less individuals/ households being served than actually were. Further, past data collected indicates serving individuals and households for which characteristics are not obtained is part of the community action story documenting services rendered. It should be noted that there will be challenges and a lack of consistency with defining, identifying and tracking new participants.</p> <p>Module 4, Section B: All Characteristics Report: (page # 53-54) Remove all items that indicate an estimated number of individuals and families not included in this report. There is no defined purpose for nor a way to validate this information.</p> <p>Module 4, Section C Remove "The expectation is that agencies will eventually report on the 180 day indicator" and modify the instructions to state that tracking information will not be required for any CAA and that the report forms provide a place for capturing follow up where it is appropriate. Other general points are as follows:</p> <ul style="list-style-type: none"> •L Under the current annual report structure, local agencies have 5 report sections in which they may report. Under the proposed annual report structure, local agencies have at least 9 sections in which they may report. ROMA Next Gen should make every effort possible to streamline reporting and decrease opportunities for misreporting. The accuracy and ultimately quality of information gathered in the proposed report is questionable as no single, agency-wide data collection software has been offered as a model for combining all community action programs for tracking to meet the requirements of this report with unduplicated information. Should such a system exist, agencies would likely need additional funding to supplement the related expense. •L The estimated burden associated with completing this Annual Report is likely underestimated because of the unknown variables and significant increase in information collected. u- North Carolina continues to advocate for a National Goal that clearly links the Network's effort to eliminate poverty since the primary purpose of CSBG is poverty reduction, community revitalization and empowerment of families to become self-sufficient as indicated in current legislation. Specifically, we recommend a national goal that speaks to poverty reduction that defines what poverty is and is ultimately linked to

performance indicators representing family level movement up the % of poverty income scale.

North Carolina's Office of Economic Opportunity believes that the state's administrative oversight is the linchpin for successful CSBG operations and has been active on all workgroups in expressing feedback for every effort supporting the Performance Management Framework. It is our hope that NC's experience, expertise and commitment to ensuring that low-income families have access to best available resources through CSBG will be given consideration as ROMA Next Gen is vetted and finalized. We further believe that NASCSP has a reputable history of progressive leadership, qualified and committed staff and a track record of demonstrated effectiveness in performance with ROMA and other CSBG Training and Technical Assistance efforts. Therefore, we further hope that OCS will accept final recommendations from NASCSP as to what will best depict the work of the CSBG network. Together, we are confident that we will achieve the desired breakthrough results and demonstrate accountability and transparency while stewarding the resources obtained through the Community Services Block Grant.

Comment 116 (Texas Association Of Community Action Agencies, Inc. (TACAA); Other/Unknown in TX)

Module 4: No Comment

Comment 117 (Texas Department Of Housing And Community Affairs ; State in TX)

Module 4: OVERALL COMMENTS FOR MODULE 4: We strongly recommend removing the Landing Page; it only adds another layer of information and it becomes cumbersome requiring the user to toggle back and forth between the Landing Page and the Data Entry Form. Simplify the process and go straight to the Data Entry Form to enter information. Also, recommend the removal of the 180 day standard and at the most requiring 90 days for certain critical measures. It's very difficult and unrealistic to expect agencies to track persons for 180 days. In Texas, for the past 25+ years we've been tracking data on persons transitioned out of poverty for 90 days and it is extremely difficult to get clients to return and provide documentation once they are employed and no longer qualify for services. Consider having one indicator/measure under Stability where information is obtained on persons receiving case management for at least 180 days and remove the 180 days from the other domains e.g., Employment, Health and Social/Behavioral Development.

Please clarify why the differentiation of having a different set of NPIs for working and non-working such as elderly or disabled was removed. It's difficult to determine under the new structure, which NPIs are for working or able to work versus those that are elderly or disabled. In the current NPIs, under 1.2. "Employment Support", the structure distinguishes between working persons and persons able to work; and under the 6.4s, the population of seniors, disabled, and caregivers.

MODULE 4 SECTION A

1. Module 4, Section A Characteristics for NEW Individuals and Households - There is a need for a clear definition of "NEW Individuals and Households." Is this "new" in that the participant has never been served by the community action agency or new for the program year (unduplicated)?

MODULE 4 SECTION B

1. Module 4, Section B Proposed All Characteristics Report, it is unclear if persons reported in Section A also get reported in Section B "All Characteristics Report."

2. Recommend that Module 4, Section A and Section B collect the same information. This will streamline the collection of data for staff and support a more efficient process for program development.

3. Module 4, Section B, Section 13 Sources of Household Income, recommend not having so many variations and deleting b., c., and d. Consider separate choices for employment, other income source, non-cash benefits, 2 sources, 3 or more sources instead of the current combinations.

MODULE 4 SECTION C

1. Module 4, Section C. Individual and Family NPIs – Data Entry Forms recommend changing name of the % Achieved Column to % Served to match the Served column. Also, for % Planning revise to be % of Target Achieved or % of Planned Target Achieved.

2. Module 4, Section C., Employment – #1. Next to the term “youth,” add the age range for youth. Also, consider not having #1 for youth and just merging it with # 2 adults, but change it to be persons and not differentiate by age.

Module 4, Section C., Employment - #2. C. delete “up to a living wage” because this is confusing or use the terms “below a living wage.” Delete c. maintain employment for at least 180 days because this will be extremely difficult to document and reporting will be very low.

Module 4, Section C., Employment - #2 c. the 180 day period to track is much too long. It’s extremely difficult to get clients to return once they obtain a job. A recommended time period is to not exceed 90 days.

Module 4, Section C., Employment - #3. Revise the term “with a living wage or higher” to be “at or above a living wage.” Texas anticipates very low numbers for these measures based on past performance.

Module 4, Section C., Employment - #4. “The number of employed participants in a career advancement related program who entered or transitioned into a position that provided increased income and/or benefits.” Change this to read “The number of employed participants who obtained increased income and/or benefits.” The current language limits who can be reported. Also, the vast majority of CSBG clients are not in a career advancement related program. Second, merge #4.a.-c. To read “The number of employed participants who obtained an increase in employment income through wage/salary increases, an increase in hours worked, or increased benefits.”

3. Module 4, Section C., Education and Cognitive Development, include in the guide clear definitions for terms such as “emergent”, “improved positive approaches”, “improved basic education.” For “improved basic education” does this include GED and Adult Basic Education or life skills? We are not clear why the 180 day standard is at the top of the page.

MODULE 4 SECTION C

4. Module 4, Section C., Income and Asset Building, #1 after “basic needs” include examples such as housing, food, transportation. For #8 define what constitutes net worth. If a short description is possible, include it on the form.

5. Module 4, Section C., Housing, #2, it is unclear whether these measures pertain to persons who obtained housing who were homeless? Please clarify. Also, we recommend not qualifying this measure with the terms “safe” and “affordable” housing that has varying interpretations and also limits who can

be reported. Subsidized housing may not be affordable without assistance. Delete 2.b. because 180 days is too long a period to track. For #5-#7, ensure that the guide clearly describes the types of programs can be reported. We recommend deleting #3 households who avoided eviction and #4 households who avoided foreclosure. In Texas, the vast majority of community action agencies do not operate housing focused programs and we anticipate this to be the similar in other states. If not removed, we suggest merging #3 and #4. For #5-#7, expand instructions to clarify the programs or grants concerned and if it is programs such as weatherization and LIHEAP, state such.

6. Module 4, Section C., Health and Social/Behavioral Development, for #2 individuals who demonstrate improved physical health and well-being and #3 individuals who demonstrate improved mental and behavioral health and well-being. Please clarify how “improvement” is documented? We have concerns about how this improvement will be documented. Would a questionnaire to the clients be adequate documentation? Consider having measure read “The number of individuals who received services targeted to improve physical health and well-being.” Also, it’s unclear why there is a need to break down the data into 4 age groups and the ultimate value of the information? What is going to be done with this data? To ease reporting burden, recommend not breaking it into age groups. For #2, what kinds of services are reported? Do services include food, utilities, and medical?

#4 “Families who improve skills related to adult role as parents/caregivers.” How are improved skills determined and documented? Consider using the current language in NPIs 6.3J and K or state “the number of families who received education or services to improve their skills or functioning in their role as a parent/caregiver.”

#5 “The number of parents/caregivers who demonstrate increased sensitivity and responsiveness in their interactions with their children.” How would a sub recipient document “increased sensitivity and responsiveness”? We recommend deleting this measure.

#6-#8, The reporting of #6, “The number of seniors who maintain an independent living situation”; #7 “The number of individuals with disabilities who maintain an independent living situation”; and #8, “The number of individuals with chronic illness who maintain an independent living situation”; is reported following a 90 and 180 days tracking. The number of tracking days is too long. Also the breakdown of data into three separate groups of individuals is an added burden. At most #7 and #8 can be grouped. Also recommend not tracking them for 90 or 180 days which is an additional reporting burden. Also, it doesn’t state in the description “as a result of services provided,” that it means as a result of CAA services. Please clarify. In the guide,

MODULE 4 SECTION C

describe what kind of services or assistance would this be referring to. Preference is with the current reporting format of NPIs for 6.1’s and the 6.4s. The 6.4s show the variety of assistance that is provided to stabilize the vulnerable populations.

#9 “The number of individuals with no recidivating event for 6 months,” is not clear regarding the relevance of reporting this measure for the community action network. Is this about involvement in criminal justice system only or also school delinquency? Recommend reporting more positive measures for youth such as the current NPIs of 6.3 E thru 6.3 I.

7. Module 4, Section C., Civic Engagement and Community Involvement, #1 “The number of Community Action program participants who increase skills, knowledge, and abilities to enable them to work with Community Action to improve conditions in the community.” Concern with the measure are

the words “to enable them to work with Community Action” because this restricts who to report in this area. Persons may be gaining skills or volunteering to assist other schools or other organizations and not necessarily community action. Recommend revising language and expand community. Example, “The number of Community Action program participants who increase skills, knowledge, and abilities to enable them to improve their community.” Delete a.i. “number who become engaged in a leadership role.” Very detailed and we anticipate that activity would be minimal.

For #1.b. “number who improve their social networks,” the term “social network” is really not commonly understood or utilized. We recommend using another term or not collecting this data. Also, if they volunteer, don’t they automatically improve their social networks? What is meant by “social network”? Is it the circle of persons that they associate with?

For #1.c. “number Who gain other skills, knowledge and abilities to enhance their ability to engage?” How is this going to be measured and documented? What exactly are we measuring? If it is necessary to collect, redefine and perhaps merge with #1.a. and expand and broaden language so it does not imply that they will be able to demonstrate or measure this improvement.

8. Module 4, Section C, Individual and Family NPIs, #1 “the number of individuals who achieve one or more outcomes as identified by the NPI in various domains.” The achievement of one or more outcomes in various domains does not necessarily mean that a person or household is more stable. This is also adding another layer of reporting which may not be necessary. The issue of whether an individual achieved one or more outcomes may not be the basis of the measure, but whether they are successful. Recommend deleting this measure or using another term other than stability.

In initial discussions, we did discuss bundled services and that persons who received bundled services had better outcomes. An alternative is to simplify the measure of persons who received one or more services and remove the implication that this leads to stability because for the vast majority of the households, it is only helping them for the short term. Narrowing the measure to those who achieved one or more outcomes in employment, education, and/or income and asset building may be a good indication of longer term stability.

#2 “The number of individuals engaged with the Community Action Agency who report improved financial well-being.” Consider moving this measure to Income and Asset Building category because it appears to be a more appropriate location.

MODULE 4 SECTION D

1. It would good to remove Section D so that Module 4 doesn’t have another section. The report is lengthy and will be very time consuming for staff to prepare and track. If Section D can be merged some way with Section C, that would be ideal. So, for example, a way to merge one would be in Module 4.C. Education category, in #6, add in parenthesis (Adult Literacy classes, English classes, Basic Education Classes, Leadership Training). Then for Module 4.C. Education category, #7 “obtain a high school diploma or equivalency” just add in parenthesis (GED).

2. Recommend incorporating NPI codes to facilitate references to sections. For clarity, sections should refer to Module 4.C. and each service/activity should state what Module 4, Section C. it relates to. As an example, in Adult Education Programs, there could be added in parenthesis (Module 4.C.6.).

3. How does this section relate to Module 4.C.? Is this to capture those that were enrolled only and they do not have to have achieved an outcome? More importantly, if the organization did not provide the service but referred the person to another organization for the service, would the client be reported in

this section only if the sub recipient verified enrollment with the other organization or do they also have to document achievement of the outcome?

4. Also recommend establishing a definition of “individuals served” in column two.

Comment 118 (The State Of New York Community Action Association ; State Association in NY)

Module 4: Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

- This report should be removed as it does nothing to contribute to the critical function of a CAA and when aggregated on the state level, provides no useful information

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

- Except when required by the Workforce Investment and Opportunity Act (WIOA), the indicator for 180 days should be removed in all sections. It is difficult if not impossible to track most customers for that period of time and there is therefore little value to asking CAAs to go to the time and expense required for such long term data collection.

- The Stability Indicators should be removed as they do little to help answer the question of whether people’s lives are improved because of the services received from a CAA. Because the majority of CAAs customers have very low incomes, the improvements they make would not be significant as measured by the suggested tools and scales and the most commonly used measures of financial well-being are based on the general population and therefore are not relevant to the experiences of the low income people who are served by CAAs.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

- The statement that 180 day tracking is the standard agencies should work toward should be removed. This statement strongly indicates that this will be the expectation in the future, an unrealistic and unproductive goal with the exception of Workforce Investment and Opportunity Act (WIOA) activity.

Comment 119 (TN Department Human Services ; State in TN)

Module 4: No Comment

Comment 120 (Tompkins Community Action ; Eligible Entity/Local Agency in NY)

Module 4: 1. The baseline report: As much as NCAF wishes there was a credible and cost-effective method for tracking Community Action individual and family participants over time, those most expert in our network’s field data and technology systems have identified huge barriers and costs to attaining and linking data to individuals for a period of years, especially when following their successful passage into economic security. We have proposed OCS undertake a pilot program, funded by grants and implemented by willing Community Action Agencies, so that they may design and test a system of multi-year tracking for large numbers of program participants.

2. The report on services delivered is an extensive exercise to list outputs instead of outcomes. Many Community Action Agencies are enthusiastic about substituting such a report for ROMA NPIs. We believe it will not be useful in telling the story to policymakers, nor should it be a requirement. It appears to be a step backwards from a focus on results. However, it is an elegant tool for states and local

agencies that choose to use it for their own purposes, and it should be made widely available, along with training on how to use it.
Comment 121 (Total Action For Progress ; Other/Unknown in VA)
Module 4: No Comment
Comment 123 (Tri County Community Action ; Other/Unknown in MN)
<p>Module 4: - Individual and Family Level: (pages 51-75)</p> <p>Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52) Remove this. Gathering data specifically on “new” individuals and households is not clear how this would be useful. If agencies do not operate programs that only interact with clients on a single basis per year such as LIHEAP, this would confuse data that on programs that work with clients on a long term basis or goal oriented.</p> <p>Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57) This appears to be duplicative and would not produce useful information. How does this help? The definition of well-being to a low-income person is different than that of middle class persons. A change such as opening a savings account and consistently saving would have a much different and larger impact to a local agency customer that it would for a mainstream consumer.</p> <p>Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67) Specific tracking outcomes would be dependent on the program and may be more appropriate for case management intensive programs and would be beyond the capacity of all local agency programs.</p>
Comment 124 (U.S Department Of Health And Human Service ; Eligible Entity/Local Agency in DC)
<p>Module 4: Module 4— Individual and Family Level In this module, all of the new requirements and proposed changes would require IT software changes that could potentially be costly; and the costs would have to be absorbed by our eligible entities. The new requirements would require additional staff time and effort for the State CSBG Office and our eligible entities to track, collect, and report this data and information. Training and technical assistance for the State CSBG Office and our eligible entities would be necessary and could be costly; and our eligible entities would have to pay for their costs.</p> <p>Section A: Characteristics for NEW Individuals and Households This proposed report is new and would probably work for describing the people who come to an eligible entity for services for the first time, but it is unlikely it would be useful beyond that, and it really is not necessary for eligible entity performance. Our State CSBG Office and eligible entities agree that this new requirement would be too costly (IT software changes) for something that appears would only provide little benefit. This report should be removed.</p>

Section C: Individual and Family NPIs

In regards to the expectation that eligible entities track outcomes for 180 days: This section should be clarified to state that these requirements should only apply to community action programs that have this tracking mechanism included in their program design. The language stating that the expectation is that all eligible entities will be able to report this data in the future should be removed.

In regards to requiring eligible entities to report targets: Our state sees the Individual and Family Level NPIs Report as a tool for reporting and showing eligible entity individual and family level outcomes (telling the story), not as a planning and analysis tool. Our eligible entities stated that they use their client and community needs assessment data, program specific data, and other local data and information for program planning and implementation; rarely do they use the data and information from their Individual and Family Level NPIs Report for planning and analysis.

The State CSBG Office and our eligible entities agree that the eligible entities should report their outcomes annually to the state and OCS. Therefore, we suggest the targeting component be removed from this report and the report focus on collecting community action performance data and information solely.

Comment 125 (Vermont Community Action Partnership ; Other/Unknown in VT)

2. Module 4: Remove the Characteristics for New Individuals and Households Report. This report has very little if any practical utility at the local level in most cases, and will be a significant net drain on agency resources, given the time and expense required to create it at each local agency. This is not necessary for agency performance (and may in fact contribute to diminishing it), and the intentions outlined by OCS for its use are not reflective of how local agencies and states look at their communities to assess needs, develop programs, and report progress. It also lacks utility at the state level given that data such as this rolled up to the state level will often be skewed by large population centers and will therefore decrease the practical utility of the data even further. In addition, many agencies, including those in Vermont, either lack management information systems with the capacity to disaggregate this type of data from its overall customer database, or struggle to integrate the required data given their use of multiple (and often incompatible) reporting systems required by our disparate funding sources. Moreover, since our agencies serve many families over time, with no definition of “new” being provided for review, the CSBG network will be unable to implement this report consistently. Defining an individual or family as new becomes challenging when they may receive different services over many years (e.g. Head Start / Early HS, child care, afterschool programs, youth services, job training / readiness, food, fuel, homelessness prevention, small business support, financial literacy, IDAs, income tax assistance, senior services, etc.).

Module 4: Module 4 – Individual and Family Level: (pages 51-75)

Module 4, Section A: Characteristics for New Individuals and Households: (page # 52)

Remove this report in its entirety. It is not necessary for the proper performance of the functions of local agencies, and when rolled up to the state, the information has no practical utility. At a state level it will be misinterpreted and can be unduly influenced by what happens in larger population centers. Four further points illustrate this issue: First, the Characteristics report is of little use to determine if the agency is responding to needs identified in its community assessment. Demographic data alone does not identify the needs the new customers may have and is therefore of limited utility in comparison to data about individual, family, and community needs. Second, since several core CAA programs (e.g.

LIHEAP) have a large number of new customers with limited or one time contact with the agency, demographic data collected from the “low touch” services would confuse meaningful analysis of demographic trends. Third, many CAAs have to rely on data collected by their partners, many of whom may have limited capacity to collect demographic data for new individuals and households. Fourth, there are many practical problems to identifying what constitutes a new customer or household, which also creates an additional data collection burden on staff.

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

1. Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required. Local entities are not provided funding to track those receiving services for that period of time, leading to a significant financial / infrastructure burden and often an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Many of the data collection systems used by agencies also simply lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.

2. Remove the Stability Indicators. The options available do not provide data to answer the question on the data collection form on page 67, “The following outcome indicators answer the following commonly asked question: How many people (or families) are ‘better off/lives improved’ because of CAAs work?” The first option is a duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau’s Financial Well-Being Scale relies on assumptions and definitions about what constitutes “well-being” drawn from the general population. This will result in the collection of data of limited utility for two reasons: First, compared to what constitutes financial well-being as defined by working and middle class Americans, the large majority of agency customers will be at the lowest end of the scale, meaning there will be too little variance in the data to allow for meaningful comparison. Second, what constitutes successful outcomes for most agency customers would only result in slight changes on the scale. For example, doubling savings from \$50 to \$100 a month would represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. In short, the scale is an inappropriate measure and will not result in the collection of useful data.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

Remove this statement from the data collection form: Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking). This sweeping statement leads the reader to believe the future expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies. It should be edited to clearly state this is limited to Workforce Investment and Opportunity Act (WIOA) activity or to any other programs whose funders require that follow-up outcome data.

Comment 126 (Vernon Community Action Council, Inc.; Eligible Entity/Local Agency in LA)

Module 4: No COMMENT

Comment 127 (Virginia Community Action Partnership ; State Association in VA)
<p>Module 4: Regarding Module 4, we are concerned about the characteristics for “new” individuals and households report. This is only one of the areas where we are deeply concerned about the lack of information systems at the local agency level and the inability to integrate multiple (and sometimes incompatible) reporting systems for programs and services. We do not think that collection of this data meets the standard of practical utility, particularly due to the time and expense of data collection at each local agency as well as our concern about whether data will be able to be reported consistently across the network. Many agencies serve families over a period of time, and with no clear definition of a “new” family, there is a real concern about how to reflect services provided to a family that receives different community action services over a period of years. Regarding Module 4, the stability indicators are a source of concern. The indicators selected for stability appear to duplicate data already collected (in one option) and use a tool for financial stability that does not reference assumptions for low-income people and families (in another option). It would appear that any data collected in this area would be of limited utility at best, and we would recommend removal of the stability indicators.</p> <p>Regarding Module 4, Section A-Characteristics for “NEW” Individuals and Households, we recommend removing this document because it will not produce quality data. In addition, there is a challenge in providing a consistent definition of who constitutes a new customer. Agencies that use multiple reporting systems will have a new burden of tracking new customers across all programs and services delivered by the agency.</p>
Comment 129 (Western New York Community Action Agency; Eligible Entity/Local Agency in NY)
Module 4: No Comment
Comment 130 (Wisconsin Community Action Program Association ; State Association in WI)
<p>Module 4: * The requirements for baseline characteristics will require a collection of information before any services are provided – an activity which is both time-consuming for staff and financially burdensome for the agency</p> <p>We believe the progress made to date (since January 2011) in the development of ROMA: Next Generation is significant and we want to keep moving forward. In doing so, we must be sure the final product has value at all levels; is realistic given existing financial resources, technological capacity, diversity of the network, and is sensitive to the burdens placed on states and local agencies.</p>
Comment 131 (Wisconsin Department Of Children And Families; Eligible Entity/Local Agency in WI)

Section B: All Characteristics Report: (page # 53-54)
<p>3. Education Levels: I do not believe it is useful to track the education level of individuals ages 14-24 as a group. Since this group includes both minors and young adults, data about the group's education level would not be meaningful. For example, having an 8th grade education is entirely different for a 14-year-old who is currently in 9th grade and on track to graduate from high school than it is for a 22-year-old individual.</p> <p>4. Disconnected Youth: This is data is a very good addition to the demographic form.</p> <p>7. Military Status: This is data is a very good addition to the demographic form.</p> <p>15. Non-Cash Benefits: I believe this is very useful information to track. I know that some agencies in my state's network have expressed the view that collecting this information will be overly burdensome, but if nothing else it will cue agency staff to help people connect to benefits for which they are eligible.</p>
Comment 132 (Work And Family Support Bureau; Other/Unknown in NM)
Module 4: No Comment
Comment 133 (WSOS Community Action; Eligible Entity/Local Agency in OH)
Module 4: No Comment
Comment 134 (York County Community Action ; Eligible Entity/Local Agency in ME)
Module 4: * Remove the expectation that all organizations will have 100% unduplicated data. We certainly strive to de-duplicate our information, however, with a robust transportation program, we cannot guarantee that our number of riders is unduplicated without undue burden on our systems.