ROMA Next Generation Initial Feedback Period Feedback Summary & Rationale for Revisions to the CSBG Annual Report

This document outlines the feedback received during the ROMA Next Generation (NG) Initial Feedback Period and an overview of the rationale for the revisions made to each component. Additionally, this document outlines concerns that may not have been fully addressed during this round of revisions, but will continue to be assessed throughout the OMB clearance process.

Contents

National Theory of Change and National Goals

This component does not require OMB clearance and as such is not included in the OMB packet. No changes have been made to this document since the Initial Feedback Period. Comments and revisions will be considered at a later date.

Module 1 State Administrative Report

This component was not reviewed during the Initial Feedback Period.

Module 2 Local Agency Fiscal and Capacity Report

Feedback Summary

NASCSP and OCS heard from a total of 553 respondents from across the CSBG Network, who provided qualitative and quantitative feedback on the ROMA Next Generation *Local Agency Fiscal and Capacity* components of the Annual Report. Of the 1,027 agencies nationwide, 509 CSBG Eligible Entities or Community Action Agencies provided feedback or were represented as part of a collective response. We heard from a total of 26 State CSBG Lead Agencies and 18 State Associations, with some states and associations submitting comments representing a collaborative response on behalf of agencies and states, while others submitted comments from their own perspective and unique role within the CSBG Network. We also received letters and emails from National Partners and interested individuals who choose to submit letters instead of responding to the survey as a representative of a community action agency, state lead agency, or state association. The respondents represented agency, state lead agency, and state association staff as well as national partners and individuals. Not every respondent provided feedback on all of the fiscal and agency capacity components.

Section A: Local CSBG Expenditures

Feedback Summary

Of the 522 respondents asked to rate how well the domains for reporting expenditures in the *Local CSBG Expenditures Report* allowed them to describe CSBG expenditures, 78% responded a 4 or 5 (very well), 12% reported a 3, and 10% reported a 2 or 1 (not well).

Written feedback via open ended questions indicated several concerns about this report. Respondents commented that the domains listed in the expenditure report should align with the domains in the services and strategies lists. Additionally, comments indicated that local agencies want to be able to report on activities related to agency capacity that are funded by CSBG and other sources.

Rationale for Revisions

Based on the feedback received on the *Local CSBG Expenditures Report*, the domains listed in the report were revised to align with the domains listed in the services and strategies lists, as well as the CSBG statute. Service Supporting Multiple Domains was added as a domain to report on CSBG Expenditures that span or support outcomes achieved across multiple domains for families and individuals. Administration funding was moved from the table and revised to follow how CSBG funds used for administration are currently reported in the current CSBG IS survey. The report now asks agencies to identify "Of the CSBG funds reported above, report the total amount used for Administration". The agency capacity report was revised to collect information on activities funded by CSBG and those funded

by other sources. The revised *Local CSBG Expenditure Report* asks only about activities funded by CSBG. Other reporting related to Agency Capacity was moved to the Agency Capacity report.

Section B: Local Agency Capacity

Feedback Summary

Of the approximately 515 respondents who completed the survey on the *Local Agency Capacity Report*, feedback was generally positive. When asked to rate how well the list of credentials and certifications reflect staff qualifications that demonstrate agency capacity, 69% responded a 4 or 5 (very well), 17% reported a 3, and 12% reported a 2 or 1 (not well). When asked how well the identification of hours demonstrates your support for board members, staff, and volunteers, 66% responded a 4 or 5 (very well), 19% reported a 3, and 14% reported a 2 or 1 (not well). When asked how well the list of activities identifies your agency capacity building activities, 59% responded a 4 or 5 (very well), 18% reported a 3, and 21% reported a 2 or 1 (not well).

Written feedback via open ended questions provided concrete suggestions for revisions to the report. These recommendations included expanding the list of credentials listed in the report, adding a section for reporting agency partnerships, and allowing agencies to report on agency capacity activities funded by CSBG and other sources.

Rationale for Revisions

The *Local Agency Capacity Report* was revised in several ways. The question regarding "activities that were funded by CSBG under Agency Capacity" continues to be included in the *CSBG Expenditures Report*, however the remaining questions in the *Local Agency Capacity Report* were moved to a separate report. The revised *Local Agency Capacity Report* includes the hours of agency capacity building, volunteer hours, staff development and certification attainment, and partnerships developed to expand agency capacity. The category on volunteer hours was previously included in the *Resources Administered by the CSBG Network Report*. It was recommended in survey feedback that volunteer hours be moved to the Agency Capacity section. Several new staff development certifications (e.g. Quality Control Inspectors, LEED Risk Certified assessors, etc.) were added to the report, per the suggestion of survey respondents. The category on partnerships was added to the report and includes all organizations, both public and private, that are currently reported in NPI 4.1 in the current CSBG IS survey, and with whom partnerships are designed to support agency capacity.

Section C: Local Resources of the CSBG Network Report

Feedback Summary

Of the 527 respondents who completed the survey on the *Resources Administered by the CSBG Network*, feedback was generally positive. When asked to rate how well the categories for recording resources allow you to describe your resources, 71% responded a 4 or 5 (very well), 17% reported a 3, and 11% reported a 2 or 1 (not well).

Written feedback via open ended questions was largely focused on the addition of volunteer hours to this report, as this was the only change made from the current *Resources Administered by the CSBG Network* in the CSBG IS survey. Respondents indicated that calculating the value of volunteer hours

based on the federal minimum wage does not align with their agency practices in making this calculation and will not accurately reflect the true value that volunteers contribute.

Rationale for Revisions
Question 2d (what is question 2D?) was removed from the *Resources Administered by the CSBG Network Report*. The questions related to volunteer hours were moved to the revised Agency Capacity report. Per the recommendations from survey respondents, the revised questions on volunteer hours do not calculate the monetary value of volunteer hours.

Module 3 - Community

Feedback Summary
NASCSP and OCS heard from a total of 731 respondents from across the CSBG Network, who provided qualitative and quantitative feedback on the ROMA Next Generation community-level components of the Annual Report. Of the 1,027 agencies nationwide, 670 CSBG Eligible Entities or Community Action Agencies provided feedback or were represented as part of a collective response. We heard from a total of 30 State CSBG Lead Agencies and 27 State Associations, with some states and associations submitting comments representing a collaborative response on behalf of agencies and states, while others submitted comments from their own perspective and unique role within the CSBG Network. We also received letters and emails from National Partners and interested individuals who choose to submit letters instead of responding to the survey as a representative of a community action agency, state lead agency, or state association. The respondents represented agency, state lead agency, and state association staff as well as national partners and individuals. Not every respondent provided feedback on all of the community level components.

Section A: Community Level Efforts-in-Progress

Feedback Summary
Of the 684 respondents, indicating how well the *Community Level Efforts in Progress Report* allows them capture the work done for communities over time, 48% responded a 4 or 5 (very well), 37% reported a 3, and 13% reported a 2 or 1 (not well). When asked how well the report captured work done independently, 46% of the 684 respondents indicated a 4 or 5 (very well), 37% reported a 3, and 15% reported a 2 or 1 (not well). When asked how well the report captured work done in partnership, 47% responded with a 4 or 5 (very well), 38% reported a 3, and 14% reported a 2 or 1 (not well). Finally, when indicating how well the report captured work done as part of a Collective Impact Initiative, 45% responded with a 4 or 5 (very well), 31% reported a 3, and 20% reported a 2 or 1 (not well).

Written feedback via open ended comments indicated several areas of concern regarding the *Community Level Efforts in Progress Report* and the associated tool. Respondents questioned the appropriateness of asking agencies to explain why it does not do community level work. The reporting requirements for this tool were identified as time consuming and burdensome. Respondents commented that the tool needed to be streamlined and provide clearer instructions and guidance on definitions of community level work done independently, through partnerships, or through a Collective Impact Initiative. Additionally, respondents requested that the report be revised to allow accurate reporting of initiatives that end early, or take a different direction over the course of the project. In

regard to the Collective Impact tool, respondents expressed concern that it will be difficult or impossible to accurately measure Behavior and Systems change. Additionally, respondents expressed concern about having access to the data necessary to track and report their progress in a community initiative.

Rationale for Revisions

The question asking agencies to report why they do not do community level work has been removed, and the report has been modified and simplified so that it collects basic information on all community level initiatives (independent, through partnerships, or collective impact) and better showcases the connection between strategies and outcomes. This simplified report also demonstrates how initiatives would be reported on over time, where information would carry over from year to year, and how outcomes would be tracked and captured. The Collective Impact reporting tool first presented to the Network is now offered as an agency level tool to inform and support reporting in the revised *Community Level Efforts in Progress Report*, now presented as the Community Level Landing? Page and Status Page.

Section A Supplemental: Strategies List

Feedback Summary

The following list demonstrates the responses from the 660 respondents who indicated how well the *Community Strategies* allows them capture the work done for communities by domain:

- Employment: 59% responded a 4 or 5 (very well), 22% reported a 3, and 16% reported a 2 or 1 (not well).
- Education and Cognitive Development: 52% responded a 4 or 5 (very well), 31% reported a 3, and 12% reported a 2 or 1 (not well).
- Infrastructure and Asset Building: 46% responded a 4 or 5 (very well), 28% reported a 3, and 23% reported a 2 or 1 (not well).
- Housing: 57% responded a 4 or 5 (very well), 25% reported a 3, and 16% reported a 2 or 1 (not well).
- Health and Social/Behavioral Development: 53% responded a 4 or 5 (very well), 31% reported a 3, and 13% reported a 2 or 1 (not well).
- Community Support Services: 59% responded a 4 or 5 (very well), 25% reported a 3, and 13% reported a 2 or 1 (not well).
- Emergency Management: 45% responded a 4 or 5 (very well), 34% reported a 3, and 14% reported a 2 or 1 (not well).
- Civic Engagement and Community Involvement (Goal 2): 57% responded a 4 or 5 (very well), 29% reported a 3, and 13% reported a 2 or 1 (not well).
- Civic Engagement and Community Involvement (Goal 3): 41% responded a 4 or 5 (very well), 35% reported a 3, and 19% reported a 2 or 1 (not well).

The Employment and Housing Domains were viewed the most favorably as allowing respondents to describe all the work done to ensure communities where people with low-incomes are healthy and offer economic opportunity. The list of strategies under Infrastructure and Asset Building, Emergency Management, and Civic Engagement and Community Involvement (as it related to Goal 3) received the lowest ratings, a 46%, 45% and 41% respectively.

Written feedback via open ended comments indicated that the Strategies List was not comprehensive and seemed disconnected from the outcomes and the efforts-in-progress tool.

Rationale for Revisions

The revised *Community Level Efforts in Progress Report* has become the basis of the Community Level module and integrates the *Strategies List* and associated report to capture the number and type of strategies that are implemented, and underscore that strategies are connected to and related to community-level outcomes. The option to add "Other", which had been included in the initial release, has been highlighted.

Section A Supplemental: Dropdown Lists

Rationale for Revisions

The revised *Community Level Efforts in Progress Report* has become the basis of the Community Level module and serves as the central reporting mechanism for basic information about community level initiatives in progress via dropdown menus to collect standard information such as the number and type of initiative at each agency (e.g. independent, through partnerships, or collective impact), the ultimate expected outcome, the target community, expected duration, project year and strategies implemented, along with additional information that varies by type of community level work being done.

Section B: Community Level National Performance Indicators Landing Page

Rationale for Revisions

The Community Level National Performance Indicators landing page was added to streamline reporting the Module 3 and to demonstrate that CAAs will only report on community level national performance indicators that measure and demonstrate the impact of the initiatives they have chosen to pursue. Agencies will select all indicators for which they have outcomes to report from all appropriate domains. Agencies will fill out a single data entry page that will be generated based on the indicators and domains they have selected.

Section B: Community Level National Performance Indicators Data Entry Form

Feedback Summary

The following list demonstrates the responses from the 656 respondents who indicated how well the *Community NPIs* allows them capture the work achieved in communities by domain:

- Employment: 51% responded a 4 or 5 (very well), 23% reported a 3, and 23% reported a 2 or 1 (not well).
- Education and Cognitive Development: 45% responded a 4 or 5 (very well), 32% reported a 3, and 18% reported a 2 or 1 (not well).
- Infrastructure and Asset Building: 41% responded a 4 or 5 (very well), 31% reported a 3, and 23% reported a 2 or 1 (not well).
- Housing: 51% responded a 4 or 5 (very well), 26% reported a 3, and 21% reported a 2 or 1 (not well).
- Health and Social/Behavioral Development: 44% responded a 4 or 5 (very well), 30% reported a 3, and 20% reported a 2 or 1 (not well).

- Civic Engagement and Community Involvement: 45% responded a 4 or 5 (very well), 34% reported a 3, and 20% reported a 2 or 1 (not well).

Approximately 40% to 50% of the respondents noted that the indicators in each domain enabled them to capture the impact of the work done to achieve community-level change. Similar to the Strategies List, the Employment and Housing Domains were viewed the most favorably, while the Infrastructure and Asset Building Domain received 41% support of favorable rankings.

Written feedback indicated concern that some of the Community NPIs are beyond the likelihood of achievement, due to issues such as capacity, local need, scope, or resources available to the agency. Comments, particularly from agency-level staff, presented the possibility that CAAs do not have access to the data (i.e. baseline statistics) needed to measure some of the indicators with reliable, comparable data and that some indicators are not possible to measure. There was also concern around the aggregation of indicators from the local, to state, to national levels, and concern that meaning and local context would be lost as the numbers aggregated beyond the local level.

Rationale for Revisions
Several of the NPIs were revised in response to Network comments that there were indicators missing which prevented agencies from capturing their work, and others were reordered to more accurately capture outcomes. Additionally, OCS and NASCSP conducted a thorough review of the social/population indicators included in the proposed Community Level NPIs in order to ensure the NPIs listed accurately represent the current capacity of Community Action Agencies. It is noted in the revised Community Level NPIs that agencies are encouraged to report the baseline where it is appropriate and alternately provide a narrative description of the current conditions that have led to the community level initiative if baseline information is not available. The baseline will not be rolled up to the State or National level.

Module 4 - Individual and Family

Feedback Summary
NASCSP and OCS heard from a total of 609 respondents from across the CSBG Network, who provided qualitative and quantitative feedback on the ROMA Next Generation individual and family-level components of the Annual Report. Of the 1,027 agencies nationwide, 559 CSBG Eligible Entities or Community Action Agencies provided feedback or were represented as part of a collective response. We heard from a total of 27 State CSBG Lead Agencies and 21 State Associations, with some states and associations submitting comments representing a collaborative response on behalf of agencies and states, while others submitted comments from their own perspective and unique role within the CSBG Network. We also received letters and emails from National Partners and interested individuals who choose to submit letters instead of responding to the survey as a representative of a community action agency, state lead agency, or state association. The respondents represented agency, state lead agency, and state association staff as well as national partners and individuals. Not every respondent provided feedback on all of the family and individual level components.

Section A: Characteristics Report for NEW Individuals and Households

Feedback Summary

Of the 581 respondents, indicating how well the *Baseline Characteristics Report* allows them to describe the population with which their agency works, 65% responded a 4 or 5 (very well), 17% reported a 3, and 17% reported a 2 or 1 (not well). Written feedback indicated concern that the *Baseline Characteristics Report* is intended as a comparison against the *All Characteristics Report.* The comments varied from responders not seeing the value of this report to those who agreed it is important and are already collecting and reporting in this manner. Comments also addressed systems issues with collecting and tracking this information over time, and raised concerns over agencies' ability to produce unduplicated counts. Comments also varied in their response to the addition of "Other" as a gender category.

Rationale for Revisions

The name of this report has been changed from *Baseline Characteristics Report* to *Characteristics Report for NEW Individuals and Households.* This name change emphasizes that this report will not be used as a comparison against the *All Characteristics Report*. This report has also been shortened to capture key information essential to providing agencies, states, and OCS with a stronger understanding of the participants who enter CAA services within a reporting year, prior achieving outcomes as a result of receiving services. The revised *Characteristics Report for NEW Individuals and Households* collects information on Gender, Age, Education Levels, Disconnected Youth, Health Insurance, Work Status, Source of Household Income, Level of Household Income, Housing, Household Size, and Household Type. "Unknown or not reported" has been added as a data point to each category to underscore that we recognize that not all data can or will be collected on every individual and household. Due to concerns related to interoperability, agencies can now provide an estimate of how many new participants are not – counted in this report.

Additionally, the proposed revisions respond to interoperability issues, an agency's ability to identify and maintain records for participants new to a local agency within a program year, or an agency's ability to produce unduplicated counts by allowing the opportunity to report the estimated total number of new individuals and households who were not included in the report. Agencies can also specify the programs that were serving these new individuals and households.

Section B: All Characteristics Report

Feedback Summary

Of the 581 respondents, indicating how well the *All Characteristics Report* allows them to describe the population with which their agency works, 74% responded a 4 or 5 (very well), 16% reported a 3, and 9% reported a 2 or 1 (not well). Written feedback addressed systems issues with collecting and tracking this information over time, and raised concerns over agencies' ability to produce unduplicated counts. Comments also varied in their response to the addition of "Other" as a gender category.

Rationale for Revisions

 "Unknown or not reported" has been added as a data point to each category to underscore that we recognize that not all data can or will be collected on every individual and household. Due to concerns

related to interoperability, agencies can now provide an estimate of how many participants are not reported in this report.

Section C: Individual and Family National Performance Indicators Landing Page

The Individual and Family Level National Performance Indicators landing page was added to streamline reporting for Module 4 and to demonstrate that CAAs will only report on individual and family level national performance indicators that measure and demonstrate the impact of the initiatives, programs, and/or services they have chosen to pursue. Additional guidance was added to underscore the fact that agencies should report on all outcomes achieved by the agency, not only those achieved through CSBG funding. OCS and NASCSP will continue to emphasize that this is not a step towards mandating case management or removing local determination and the unique nature of the CSBG.

Section C: Individual and Family National Performance Indicators Data Entry Forms

Feedback Summary

The following list demonstrates the responses from the 573 respondents who indicated how well the indicators in each domain allow them to capture the impact of the work done to ensure individuals and families with low-incomes are stable and achieve economic security.

- Employment: 45% responded a 4 or 5 (very well), 36% reported a 3, and 13% reported a 2 or 1 (not well).
- Education and Cognitive Development: 45% responded a 4 or 5 (very well), 38% reported a 3, and 11% reported a 2 or 1 (not well).
- Income and Asset Building: 48% responded a 4 or 5 (very well), 35% reported a 3, and 11% reported a 2 or 1 (not well).
- Housing: 52% responded a 4 or 5 (very well), 34% reported a 3, and 8% reported a 2 or 1 (not well).
- Health and Social/Behavioral Development: 44% responded a 4 or 5 (very well), 35% reported a 3, and 14% reported a 2 or 1 (not well).
- Civic Engagement and Community Involvement: 33% responded a 4 or 5 (very well), 45% reported a 3, and 16% reported a 2 or 1 (not well).

Of the 573 respondents asked how well each stability indicator option for the Individual and Family Stability domain allow them to capture the impact of the work done to ensure individuals and families with low incomes are stable and achieve economic security, the responses were as follows:

- Option 1: 40% responded a 4 or 5 (very well), 20% reported a 3, and 37% reported a 2 or 1 (not well).
- Option 2: 28% responded a 4 or 5 (very well), 19% reported a 3, and 50% reported a 2 or 1 (not well).
- Option 3: 29% responded a 4 or 5 (very well), 27% reported a 3, and 41% reported a 2 or 1 (not well).

Written feedback via the survey comments indicated additional clarification is needed regarding how to calculate a living wage. Comments also indicated some general confusion related to whether or not

CAAs will have to report on every indicator and whether or not they can report outcomes if the program or outcome was not funded by CSBG. Additionally, respondents indicated additional clarity regarding the purpose of the stability indicators is required. There was sufficient concern regarding agency's ability to track outcomes over a 90 or 180 day period.

Rationale for Revisions

An indicator was added under the employment domain to respond to feedback requesting the addition of an indicator to capture unemployed youth who obtain employment to gain skills or income. The indicators under the employment domain has been changed to specify adult, youth, or all participants. Under Education and Cognitive Development and Income and Asset Building, indicators asking about education attainment and increased financial assets have been modified to allow agencies to report a single participant who obtained multiple outcomes as opposed to picking a single outcome for a participant. Additionally, the indicator under Education and Cognitive Development regarding the number and percent of children and youth who are achieving at grade level has been modified to provide additional clarity around grade level.

We heard the Network's concern over tracking outcomes over a 90 day and 180 day period, and additional instruction has been added to clarify that 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, but these indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking).

Based on Network feedback, Option 2 of the suggested stability measures, the sustained impact measure (The number and percent of individuals engaged with the Community Action Agency who achieved and maintained the ability to meet basic needs for six months), has been removed. We will move forward with suggesting Option 1 (The number and percent of individuals who achieve one or more outcomes as identified by the NPIs in various domains) and the proposed Option 3 (The number and percentage of individuals engaged with the Community Action Agency who report improved financial well-being) to OMB for formal comment.

Additional instruction was added regarding the definition of living wage. Agencies can provide their own definition or select from national or locally-defined models.

Section D: Services

Feedback Summary

The following list demonstrates the responses from the 568 respondents who indicated how well the Services allow them to capture the range of work done by domain to ensure individuals and families with low-incomes are stable and achieve economic security:

- Employment: 67% responded a 4 or 5 (very well), 18% reported a 3, and 11% reported a 2 or 1 (not well).
- Education and Cognitive Development: 67% responded a 4 or 5 (very well), 23% reported a 3, and 8% reported a 2 or 1 (not well).

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- Income and Asset Building: 70% responded a 4 or 5 (very well), 20% reported a 3, and 8% reported a 2 or 1 (not well).
- Housing: 74% responded a 4 or 5 (very well), 16% reported a 3, and 8% reported a 2 or 1 (not well).
- Health and Social/Behavioral Development: 67% responded a 4 or 5 (very well), 18% reported a 3, and 13% reported a 2 or 1 (not well).
- Support Services: 69% responded a 4 or 5 (very well), 19% reported a 3, and 11% reported a 2 or 1 (not well).
- Civic Engagement and Community Involvement: 56% responded a 4 or 5 (very well), 30% reported a 3, and 12% reported a 2 or 1 (not well).

Written feedback indicated concern around measuring and defining services, requested that the words "classes" and "sessions" be removed, and asked for the addition of an "Other" option.

Rationale for Revisions
The list of services was expanded to include concrete suggestions from the Network, and the words "classes" and "sessions" have been removed.