



August 15, 2016

U.S. Department of Health and Human Services
Administration for Children and Families
Office of Planning, Research and Evaluation
330 C St SW, Washington, DC 20201
ATTN: ACF Reports Clearance Officer – Robert Sargis

Dear Mr. Sargis,

Thank you for the opportunity to comment on the proposed Community Services Block Grant (CSBG) Annual Report. NASCSPP appreciates the ability to actively participate in this process through our current cooperative agreement, Performance Management System Development and Data Collection Analysis and Reporting for the CSBG Program, with the Office of Community Services (OCS). As a training and technical assistance provider and membership organization for State Administrators of both the CSBG and Weatherization Assistance Program, NASCSPP continues to applaud and actively support the federal investment and national commitment to reducing poverty in our nation that the CSBG and weatherization programs represent.

As part of this cooperative process, NASCSPP has convened, participated in, and promoted a wide range of opportunities for engagement during the process of drafting the proposed CSBG Annual Report and served as a conduit for soliciting and aggregating CSBG Network feedback. We appreciate that this is a collective, network-driven process that has been rich with engagement and dialogue. The timeline for distribution and comment between the initial release of information and the start of the 60-day comment period took place in a relatively short timeframe. This has left challenges and a remaining need for feedback, revisions, and areas of compromise to ensure a strong final product for the three year clearance of the CSBG Annual Report. We have reviewed the proposed CSBG Annual Report to identify both the strengths and potential weaknesses. Our feedback is provided below and addresses the key questions posed by OCS, as well as module specific feedback.

Practical Utility, Estimated Burden, and Quality and Clarity of Information to be Collected

As we work with all levels of the CSBG Network to revise and strengthen our performance management framework and modify our performance evaluation system, we believe that the proposed CSBG Annual Report will ultimately help showcase robust results achieved by the CSBG Network for individuals, families, and communities with low-incomes. The CSBG Annual Report will help us meet the latest reforms and expectations for performance management across the government and private sector in order to focus on analyzing results and using the data to improve programs and the outcomes achieved. ROMA Next Generation introduces new elements into the CSBG Annual Report to support the analysis of services and strategies provided and the impact of these services and strategies on individual, family, and community change.

Table with 4 columns: LEADERSHIP, LEADERSHIP, ADDRESS AND PHONE, WEBSITES. Contains contact information for Jenae Bjelland, Bill Brand, Willie Fobbs, Vaughn Clark, Joseph Pereira, Tamera Kohler, Verna Best, Bruce Hagen, and website URLs.

The modified CSBG Annual Report will provide clearer descriptive data that will demonstrate outcomes at the individual, family, and community levels, and foster improved data analysis at every level of the CSBG Network. We recognize the significant improvements within the proposed CSBG Annual Report, namely the addition of the Strategies and Services reports, the expanded section on community level work, modernized language and indicators, and the intent to automate State level reporting in OLDC.

At the same time, NASCSP urges OCS to recognize and take into account the critical training and technical assistance elements necessary to successfully implement the CSBG Annual Report and capture quality, meaningful data. Listed below is a high level summary of areas of concern as related to the CSBG Annual Report and is intended to serve as an “At-A-Glance” version of this letter. These concerns are elaborated upon in the next section of this letter:

1. Implementation and Timeline

The completion of the CSBG Annual Report will require substantial investments in staff time and resources at the Federal, State, and Community Action Agency (CAA) levels. In order for this important endeavor to succeed, it is essential for OCS to modify the projected implementation timeline to allow for the necessary training and technical assistance and systems upgrades. It will be necessary to provide significant training to staff at all levels of the CSBG Network to ensure all understand how the different pieces work together and how to complete the various reporting forms included in the new report. It is also critical to allow sufficient time for the CSBG Network to evaluate not only the content, but also the system for collection (either in the On-Line Data Collection (OLDC) system or other system), which has not yet been developed. We expect this training will be needed on an ongoing basis and not just one time at implementation.

2. Estimated Burden

NASCSP recognizes that the burden estimate is an average estimation across States and CAAs, and therefore may either over or underestimate the time and cost burden, depending on variables existing in each State. While we support the revised/automated forms, the eventual creation of an online data collection system, and agree they will yield efficiencies in the States’ processes for completing the annual report (which replaces the IS Survey), the new process also increases State accountability and places new demands on systems and software. For example, the capacity of the system in terms of interactivity and functionality for data upload, storage, and usability is an unknown element in the estimations for user burden. Additionally, the burden on States and CAAs is compounded by barriers to sharing data from other federally funded programs (e.g. Head Start, WIC, HUD, SNAP, WIOA, etc.), because few strong “bridges” currently exist at the Federal level and legal boundaries prevent data sharing.

Because the content (in the form of the CSBG Annual report) is still in its draft form, it is and will be difficult to accurately project costs and time investments needed to implement the final format. Given that both the content to be collected and the processes by which the data will be collected are still under conceptual development, making an accurate burden estimate is difficult as it is dependent on certain assumptions about capacity and implementation. With these outstanding elements, it is extremely difficult for State offices, CAAs, and the Federal government to accurately estimate the true burden of this system, the CSBG Annual Report, and a revised data collection system.

3. Module 1

- a. **B.2 and B.3 Eligible Entity Satisfaction Targets:** There are issues related to completing B.2 and B.3. These issues are related to the need for statistically significant data, guidance from OCS, and consistent administration and dissemination of the survey and the results.
- b. **B.7 Summary Analysis:** Analysis is contextual and therefore, these questions should not be mandated. Limited data sharing across programs creates challenges for meaningful analysis of trends and results.
- c. **D.2 Organizational Standards Performance:** This question sets an unreasonable standard for CAAs to meet 100% of the Organizational Standards in a reporting period. NASCSP acknowledges this standard is set in the CSBG State Plan, but believes it should not be the single reporting measure.
- d. **D.3 QIPs and TAPs:** Additional guidance will be necessary to ensure consistent practices throughout the CSBG Network for creating and implementing TAPs and QIPs.
- e. **H.4 and H.5 QIPs:** Question H.4 and H.5 will require additional training and technical assistance and guidance from OCS before implementation of Module 1.

4. Module 2

- a. **Section A, CSBG Expenditures:** NASCSP recommends further conversation on where and how CSBG administrative expenditures are reported to align with CSBG Network feedback and OCS guidance in the form of IM 37.

5. Module 3

- a. **Section A, Numerical Baseline Data:** NASCSP believes these sections must undergo additional streamlining. As such, we recommend removing numerical baseline data as a data point on the data entry forms and suggest alternate options detailed later in this letter.
- b. **Section B, Social/Population Indicators:** We recommend categorizing the social/population level indicators as developmental indicators that could be assessed and modified.
- c. **Social B, Civic Engagement and Community Involvement:** The Civic Engagement and Community Involvement goal should be strengthened to further spotlight the involvement of people with low incomes.

6. Module 4

- a. **Section A, Characteristics for NEW Individuals and Households:** NASCSP recommends eliminating this report.
- 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.

- c. **Section C, Stability Measures:** NASCSP recommends dropping Stability Measure #2.

MODULE SPECIFIC FEEDBACK:

Proposed National Goals

The three proposed National Goals included on the reporting forms for the services, strategies, and national performance indicators should be revised. The CSBG Network should continue national dialogue and engagement efforts to ensure the goals have been fully vetted and best reflect the work of the CSBG Network collectively.

Module 1 – State Administration

The sections included to manage and measure State Administration align well with the CSBG State Plan and State Accountability Measures; however, since Module 1 was not included in the initial feedback period for the proposed annual report, additional conversation, training and technical assistance, and concrete guidance are needed prior to implementation. Given its importance, Module 1 deserves thorough review and consideration by the full CSBG Network. This need for additional vetting directly effects the projected timeline for reporting on this module.

Overall, NASCSP is concerned that OIS will not have sufficient time to build Module 1 in OLDC and work with States to ensure a smooth data entry process by March 31, 2017. Additionally, the proposed Module 1 reporting date of March 31, 2017 does not allow State CSBG Lead Agencies sufficient time to prepare for reporting on this information, update their internal processes and procedures, and use OLDC. While, NASCSP recognizes OCS' budget request includes additional set aside funding to support States, it is essential—not optional—that States receive the funding necessary to fulfill the increased administration and oversight requirements. Given that this is a request and not an approved budget item, NASCSP is conscientious of the potentially increased need to dedicate staff time and resources at the State level in order to continue the CSBG Network's focus on quality administration and oversight. The following sections in Module 1 include new reporting elements that will require intensive and targeted training and technical assistance. As such, the proposed timeline is not realistic.

Module 1, Section B, Statewide Goals and Accomplishments (page # 5-6):

Questions B.2 and B.3 address the State's target for eligible entity Overall Satisfaction and process for considering feedback. The State's response to this question relies greatly on the ability of OCS, through use of the American Customer Satisfaction Index (ACSI) Survey, to achieve an acceptable response rate, administer the survey with regularity, and provide subsequent feedback to States in a timely manner. The ACSI was administered for the first time in FY 2015 and States received their results in February 2016. The process for gathering statistically significant results across the States was time consuming and response rates varied greatly across the nation. Additionally, in some states there were not enough eligible entities to achieve a statistically significant and anonymous result for the ACSI. States were not fully informed of intended reporting requirements and State responsibilities around the ACSI, until Module 1 was released for review during the 60-day comment period and additional guidance

from OCS was projected to be released by August 2016. States will need guidance and additional time to work with their agencies and prepare reports on their use of the ACSI.

The analysis component of Question B.7 presents examples of the types of analysis questions integral to quality performance management and review at the State level. However, NASCSP emphasizes that analysis is contextual and these questions should not be mandated as implied in the language, and should instead be clearly marked as examples of the ways in which data could be analyzed and understood. The State's ability to provide meaningful analysis of trends and results relies on the States' and CAA's ability to access, aggregate, and analyze data from a wide range of federally funded programs, some of which have limited data sharing capabilities. Furthermore, language in the final bullet that refers to States "encouraging" local entities to change based on state analysis can be interpreted as a potential intrusion of State authority upon statutorily mandated local control and should be altered or eliminated. We are hopeful that if States receive the necessary guidance and additional training, States will improve their ability to identify questions and data analysis procedures to guide State-level analysis.

Module 1, Section D, Organizational Standards for Eligible Entities (page # 8-9): NASCSP recognizes the work done by the Community Action Partnership and the larger CSBG Network in crafting a common set of organizational standards and the enhanced emphasis on organizational excellence. Question D.2 sets an unreasonable standard for CAAs to meet 100% of the Organizational Standards in a reporting period. NASCSP acknowledges this standard is set in the CSBG State Plan, but believes it should not be the single reporting measure. This section should also reference IM 138's statement that as long as an eligible entity is making progress towards meeting the standards, the state should not take action to reduce or eliminate funding. Question D.3 asks States to provide the number of CSBG Eligible Entities with unmet standards with a Technical Assistance Plan (TAP) or Quality Improvement Plan (QIP) in place. Guidance on standardizing the development of TAPs and QIPs must be provided to ensure consistent practices throughout the CSBG Network.

Module 1, Section H, Monitoring, Corrective Action, and Fiscal Controls (page # 20-21): As stated in reference to Quality Improvement Plans in the above paragraph, question H.4 and H.5 will require additional training and technical assistance and guidance from OCS before implementation of Module 1.

Module 2 – Agency Expenditures, Capacity, and Resources

NASCSP supports the reorganization and expansion of Module 2. Sections A and B were updated and modified to better capture the agencies' investments using CSBG funds and other leveraged resources to provide effective services and strategies, and support quality performance evaluation. During the Initial Feedback Period, Module 2, Section A, Table 1, contained the Administrative portion of CSBG funds expended by the CAA within the larger table of CSBG Expenditures. Data collected during this Initial Feedback Period showed a high level of support for the inclusion of administrative dollars within Table 1. NASCSP recommends further conversation on where and how CSBG administrative expenditures are reported to align with CSBG Network feedback and OCS guidance in the form of IM 37.

Module 3 – Community Level

NASCSP recognizes the complex and systemic causes and conditions of poverty and is dedicated to supporting and advancing the CSBG Network’s effort to address these issues at the individual, family, and community level. As such, NASCSP supports a robust framework for measuring the approaches and impact of community level work across the country. The current proposal in Module 3 expands the number of options and methods of reporting on community level work to ensure data collection will represent the initiatives implemented and outcomes achieved. Specifically, NASCSP supports the Community Level Status page and the data points proposed within that form. We recognize that the Community Level Indicators have not received the same amount of attention in the past several years as the individual and family indicators and are pleased that there is sufficient opportunity during this comment period.

While NASCSP appreciates the importance of a strong framework for data collection on community level work, some aspects of the current proposal are complex and/or beyond the current scope and capacity of the CSBG Network. Specifically, the following items are of concern:

Baseline Data for Reporting on National Performance Indicators (NPIs): While NASCSP commends OCS for the great strides taken to tackle the complex issue of tracking community level change, particularly change achieved over time through coalitions or community collaborative efforts, NASCSP recommends that the proposed data entry forms and associated calculations be modified in order to produce meaningful data. NASCSP urges OCS to eliminate some data points before moving forward in the next comment period. The Baseline (i.e. existing starting point used for comparisons) is proposed as an optional data point on the Community Level Initiative Status page and auto-populated on the NPI data entry forms and intended to provide the expected and actual percentage change from baseline. While NASCSP recognizes baseline data is critical to the local process of accurately assessing need, planning for an appropriate initiative, and evaluating efforts, there are concerns associated with including this as a data point as part of the packet moving forward. According to the proposal, the baseline data is optional and will not be aggregated to the State or National level. Consistency of reporting is a concern. In addition, NASCSP questions the value of reporting the baseline at the local level if it will not be used at the State and National levels. NASCSP recommends the following options for modifying this element of the data entry forms: 1) numerical baseline data is not collected in the data entry forms and CAAs instead provide a narrative describing the initiative; or 2) numerical baseline data is not reported in the CSBG Annual Report and baseline data remains a training and technical assistance effort at the local level and is included in the Community Needs Assessment to inform the Community Action Plan and approach for the year.

Community Level National Performance Indicators: NASCSP is keenly aware of the vast diversity of approaches implemented by local agencies to address community needs. The menu of options proposed in the CSBG Annual Report provides CAAs with a wide range of indicators in order to demonstrate community level initiatives. In addition to all of the optional indicators, we support the addition of the “other” indicator option as especially helpful in ensuring agencies are able to capture unique community outcomes. Nonetheless, the population/social indicators included in the proposal are extremely complex, difficult to measure and track, and may not accurately represent the efforts of local CAAs. NASCSP understands the concerns around social/population indicators that were expressed during the previous feedback period, as well as the fact that there are CAAs that are working toward these outcomes. Given the feedback from

the CSBG Network and the diverse approaches to community level work, NASCSP recommends keeping the social indicators in the CSBG Annual Report, but classifying the population/social indicators as developmental indicators. As a developmental indicator, this would allow for the CSBG Network to assess the clarity and utility of the indicators in capturing community level work. This revision will acknowledge the vast range of CAAs' involvement in community level initiatives, as well as the fact that needed changes within communities take a great deal of time, investment, commitment, and resources, and are often dependent on other factors outside of the scope of agencies and their partners.

Emphasis on Civic Engagement and Community Involvement: NASCSP believes it is critical that local agencies analyze community needs and conditions and aggressively pursue partnerships that address the causes and conditions of poverty. As such, the additional data points on the Community Level Initiative Status page related to partnerships are valuable in realistically telling the story of community level work. NASCSP recommends including additional emphasis on the involvement of people with low-incomes (i.e. stakeholders) in informing and contributing to community level work. We believe this will speak to CSBG's core principle of maximizing involvement of people with low incomes, ensuring initiatives are effective by including all appropriate stakeholders, and add additional context to proposed goal 3 "People with low incomes are engaged and active in building opportunities in their communities". One possible option for addressing this issue is to include stakeholder involvement in the Community Level Initiative Status page.

Module 4 – Individual and Family Level

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.

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 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.

Conclusion

The current CSBG Act, passed in 1998, establishes requirements for OCS, States, and Eligible Entities to collect data and report on the planned and actual uses of CSBG. Each state must submit a report on performance, expenditure of funds spent by the state and eligible entities, delivery of direct services, characteristics of clients served, and training and technical assistance provided to eligible entities. This has been accomplished using the CSBG IS Survey. NASCSP commends OCS for the evolution of the CSBG IS Survey into the CSBG Annual Report and for taking steps to ensure our CSBG Network is fully prepared to move forward in the ever-changing work to end poverty; however, the modifications discussed in this letter are critical in ensuring the CSBG Annual Report can be successfully implemented. Our recommendations include the removal of the New Characteristics Report, simplification of the community measures, and addition of developmental measures. These revisions will greatly alleviate the burden of data collection at all levels while still meeting the requirements of legislation and launching the CSBG Network forward into a learning culture rather than a compliance and reporting culture and further the goals laid out in the Act.

NASCSP urges OCS to extend the proposed implementation timeline to ensure the CSBG Network's capacity to accurately report on their efforts and outcomes. We acknowledge that time is of the essence; however, in order to fortify administration of CSBG and best document the performance gains of this CSBG Network, considerable revisions and extensive vetting are essential to determining what can realistically be accomplished and done well.

Sincerely,

A handwritten signature in blue ink that reads "Bill Brand". The signature is fluid and cursive, with the first name "Bill" and the last name "Brand" clearly distinguishable.

Bill Brand, President
Board of Directors