



June 21, 2024

US Department of Health and Human Services
Administration for Children and Families (ACF)
Office of Community Services (OCS)
330 C Street SW
Washington, DC 20201

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

Dear Dr. Howard,

Thank you for the opportunity to provide feedback. Please accept these comments from Allegany County Community Opportunities and Rural Development, Inc. (ACCORD) related to the proposed changes to information collected using the CSBG Annual Progress Report. We have focused on the items we feel are the most critical to assure the quality and clarity of information and meet the necessary performance measurements. First, the network appreciates the following changes in the following report and sees them as positive.

- Module 2: The removal of hours of Agency Capacity Building and the number of staff who hold certifications. These data points have posed an additional burden to Community Action Agencies.
- Module 3 (individual and Family Level): The addition of “service as concrete support” is seen as beneficial, reflecting the critical work Community Action Agencies (CAA) do to stabilize individuals and families.
- The inclusion of the new Transportation Domain elevates the recognition of the critical transportation work done by CAAs around the country, although the full impact of this work will likely still be unreportable due to duplication challenges and limitations on what is reportable in Community Level Transformation. (see note in section III)

I. Clarity of Information:

The Annual Report, specifically Module 4 (version 2.0), is designed to collect information on service provision (SRV) and the achievement of results (National Performance Indicators, NPIs). Community Action Agency staff clearly understand the differentiation between services and the impact/changes that were achieved as a result of the service (NPI). It is essential that the language used in NPIs is different from that used in SRVs. However, in the proposed revisions and additions to NPIs concerning individuals and families, this differentiation has become unclear.

For example, the following Individual/Family Level National Performance Indicators (NPIs) proposed to be **revised** refer to services and not to outcomes.

- FNPI 2a – The number of young children (0-5) enrolled in childcare or early childhood education services.
 - Enrolling in a service is an output, not an outcome.

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- FNPI 2b – The number of youth actively connected to education and skills development program.
 - Being connected is a service, not the outcome.
- FNPI 2e – The number of individuals who enrolled in post-secondary degree program (e.g., associates, bachelors, etc.)
 - What is the change? Enrolling does not mean achieving; this is a service.
- FNPI 3a – The number of individuals completing income and asset-building training.
 - What is the change? Completing a training does not mean achieving an outcome.
- FNPI 4f - The number of individuals served with energy assistance or energy efficiency homes.
 - The number served is not an outcome.

The following Individual/Family Level National Performance Indicators (NPIs) proposed to be **added** refer to services and not to outcomes.

- FNPI 5b – The number of individuals with access to health coverage.
 - Having access to coverage does not mean an improved status
- FNPI 5c – The number of individuals receiving reproductive services.
 - Receipt of a service is not an outcome.
- FNPI 5d – The number of individuals receiving wellness services.
 - Receipt of a service is not an outcome.
- FNPI 5e – The number of older adults (age 65+) receiving home visiting services.
 - Receipt of a service is not an outcome.
- FNPI 5g – The number of adults receiving preventative oral health services.
 - Receipt of a service is not an outcome.
- FNPI 5h – The number of children receiving preventative oral health services.
 - Receipt of a service is not an outcome.
- FNPI 5i – The number of individuals receiving access to healthy food options.
 - Having access to food options does not mean an improved status.

II. Proposed collection of information necessary

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

- National Performance Indicators (NPI):
 - FNPI 1b - The number of unemployed adults who obtained employment.
 - FNPI 5d - The number of individuals who improved skills related to the adult role of parents/caregivers.
 - FNPI 5f - The number of seniors (65+) who maintained an independent living situation
 - FNPI 5g - The number of individuals with disabilities who maintained an independent living situation.

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- Services (SRV):
 - SRV 5mm - Parenting Classes
 - SRV 3o - VITA, EITC, or Other Tax Preparation programs
 - SRV 7l - Immigration Support Services (relocation, food, clothing)
- This option of using “z” indicators is being proposed for elimination in 3.0. We recommend retaining the “z” indicators to allow for flexibility to reflect the unique outcomes not otherwise captured by the federal report. Loss of this option will limit the ability of the network to identify innovative changes that may be the seeds of new approaches and new advancements to be identified.

Proposed All Characteristics Report (Module 3c)

D. Household Level Characteristics

- ACCORD recommends retaining the household income source data point in demographics reporting to ensure the accurate representation of the economic impact of services provided by CAAs and to maintain critical insights into the economic conditions of the populations they serve.
- ACCORD proposes retaining the following data indicator:
 - Single Parent Female and Single Parent Male. This is useful for agencies when applying for certain grants (e.g., Fatherhood Initiatives, etc.).

III. Does the information to be collected produce a significant burden?

While the addition of a Transportation domain to the list of possible domains for which information will be collected is welcomed, the elevation of this service may pose a significant burden. The SRV section asks agencies to collect and provide information on unduplicated individuals served. Agencies that provide services without the collection of demographic data will be challenged. If “riders” use the service multiple times, the task of deduplication can be burdensome and, in some cases, impossible. Some of this may be resolved if there were related NPIs for the services to be connected.

It is not clear why the Transportation domain does not have Indicators. While in some cases, providing transportation services is what is being identified as “concrete support,” in many cases, the move from not having transportation to having transportation produces an impact on a family’s ability to meet their basic needs. When a family “obtains adequate transportation,” that is a change in status, similar to when a family “obtains housing” and should have NPIs associated with the services. Not having any indicators associated with an entire domain sends a message that outcomes are not important.

ACCORD also asks if consideration can be given to how gender is collected and, as some individuals carry more than one health insurance, adding this option would save a report error.

ACCORD recommends that OCS collaborate with the network to provide support, training, and resources to help with the transition to the new report when it is cleared. We sincerely appreciate your time and the thoughtful consideration OCS has given to making the proposed changes to the CSBG Annual Report.

Sincerely,

Lesley Gooch-Christman

Lesley Gooch-Christman, Executive Director

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