



Good afternoon,

Thank you for providing us with the chance to submit our feedback concerning the proposed modifications to the CSBG Annual Report.

Enclosed, you will find detailed comments from our team at Community Action Kentucky, Inc., the State Association. We have carefully reviewed the proposed changes to the CSBG Annual Report and have compiled our thoughts and suggestions for your consideration.

1. CAKs proposal is to continue using the CSBG Annual Report 2.1. If not, there will need to be funding to help states offset the expense of updating software systems and T/TA. There should also be more funding for local CSBG eligible entities, as this will cause the burden of work to be greater.
2. The cost associated with updating the software systems could be significantly high and present a major burden.
3. The Kentucky State Office has stated they will not change to the Federal Fiscal Year. This will never allow for our money to be correct on Module 2.
4. CAK feels like this is breaking down the quality and clarity of ROMA and/or PEAAC.
5. The proposed numbering format of the Modules will lead to confusion for CSBG eligible entities. I propose it would be more beneficial to maintain the existing Module numbering system (Module 4a FNPis, Module 4b Services, Module 4c All Characteristics Report, Module 3 Community).
6. There will be a huge impact on the State and the State Association if we are not able to see the outcomes that clients have reached by using their annual reports. It will be more burdensome to have to reach out to each agency to request additional information to make snapshots for legislative visits, etc. (e.g., how many people did you help find employment). This will be a burden for the state association, state office, and each agency as this will require additional time.
7. Changing the wording of most of the outcomes to service language (received, enrolled, connected) diminishes the achievements of the outcomes. CAK has concerns that the quality and effectiveness of the FNPis and Services may be diminishing. An agency will encounter difficulties in accurately demonstrating the progress they have made in assisting individuals towards economic security.
8. CAK proposes leaving the following in the All Characteristics Report: Single Parent Female and Single Parent Male. This is useful for agencies when applying for certain grants (e.g., Fatherhood Initiatives, etc.). This could cause a huge burden for agencies applying for grants.
9. CAK proposes leaving the following in the All Characteristics Report: Income Sources allows agencies to know who they are serving and helps to breakdown myths of who is served.

10. CAK has concerns with the new OCS Dashboard (website) that will roll out in the future. If we are lumping services and not showing outcomes, how will this look on the website to the public, legislators, other funding sources, etc.? We are afraid, this is weakening the work that a CSBG eligible entities do.

Proposed Services (Module 3a)

Employment

1. The number of unemployed adults who obtained employment has been removed as a FNPI. **This is a very important indicator for CSBG eligible entities, and it is part of the CSBG Act.**

As referenced above, obtain employment should be included therefore, more services to explain how employment was obtained should be added (e.g., Job Readiness Training, Resume Development, Interview Skills Training, etc.).

Income and Asset Building Services

1. SRV 3d – The number of individuals receiving transportation services supporting income and asset building (e.g.: bus voucher or pass to trainings, etc.). **Should this be moved to Domain 7 Transportation?**
2. There are no services to match the new NPI 3b – The number of individuals who opened a savings account **(Suggest adding a SRV – Individuals who opened a savings accounts/IDAs and other asset building accounts)** or IDA or NPI 3c – The number of individuals who purchased a home **(Suggest adding a SRV – Individuals that received Homebuyer Counseling and other homebuying support services)**. You may assume that these services are covered under the new SRV 3b but again, an agency will encounter difficulties in accurately demonstrating the progress they have made in assisting individuals towards economic security.

Housing

1. SRV 4g – The number of households receiving weatherization services. This does not necessarily align with the FNPI 4f – The number of individuals **served with energy assistance** and/or energy efficiency homes. **Served with energy assistance is including a service such as LIHEAP.**
2. Is the assumption that FNPI 4 - The number of individuals served with improved water safety in their homes - would be reached if someone had water safety which is included in SRV 4f – The number of individuals receiving housing maintenance and improvement services (e.g., structural, accessibility improvements, emergency home repairs, **water safety**, healthy home)?

Civic Engagement and Community Involvement

1. Why was Leadership Training removed from the services?

Transportation Domain

1. SRV 3d – The number of individuals receiving transportation services supporting income and asset building (e.g.: bus voucher or pass to trainings, etc.). **Should this move to Domain 7 Transportation?**

Multiple Domains

1. Why was Case Management removed?
2. Why were referrals removed?
3. Why were eligibility determinations removed?

Removing Services under Multiple Domains lessens an agency's work.

Proposed FNPIs (Module 3b)

Employment

1. The number of unemployed adults who obtained employment has been removed. **This is a very important indicator for CSBG eligible entities, and it is part of the CSBG Act.**

Education

1. 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.**
2. 2b – The number of youth actively connected to education and skills development program. **Actively connected is a service, not the outcome.**
3. 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.**

Income and Asset Building

1. 3a – The number of individuals completing income and asset building training. **What is the change? Just because I complete a training does not mean I accomplish an outcome.**
2. There are no services to match the new NPI 3b – The number of individuals who opened a savings account or IDA or NPI 3c – The number of individuals who purchased a home.

Housing

1. FNPI 4f – why was 'served with energy assistance' added? Is this still a Weatherization outcome or do you now count LIHEAP assistance here? **If so, LIHEAP assistance is an output (service), not an outcome.**
2. FNPI 4g – individuals served with improved water safety in their homes – is the LIHWAP? **Individuals served would be an output (service), not an outcome.**

Health

1. Many of the outcomes in Domain 5 are outputs (services), not outcomes.
2. FNPI 5b – The number of individuals with access to health coverage. **This is an output**

- (service), not an outcome. What is the change?
3. FNPI 5c – The number of individuals receiving reproductive services. This is an output (service), not an outcome. What is the change?
 4. FNPI 5d – The number of individuals receiving wellness services. This is an output (service), not an outcome. What is the change?
 5. FNPI 5e – The number of older adults (age 65+) receiving home visiting services. This is an output (service), not an outcome. What is the change?
 6. FNPI 5g – The number of adults receiving preventative oral health services. This is an output (service), not an outcome. What is the change?
 7. FNPI 5h – The number of children receiving preventative oral health services. This is an output (service), not an outcome. What is the change?
 8. FNPI 5i – The number of individuals receiving access to healthy food options. This is an output (service), not an outcome. What is the change?
 9. Why was the old 5f removed (The number of seniors (65+) who maintained an independent living situation)? To agencies supporting senior independent living, this is an important FNPI.

Proposed All Characteristics Report (Module 3c)

D. Household Level Characteristics

1. I propose leaving the following: Single Parent Female and Single Parent Male. This is useful for agencies when applying for certain grants (e.g., Fatherhood Initiatives, etc.).
2. I propose leaving the following in the All Characteristics Report: Income Sources allows agencies to know who they are serving and helps to breakdown myths of who is served.

We sincerely appreciate your time and the thoughtful consideration you are giving these critical matters. Your dedication to understanding and addressing these issues is greatly valued by Community Action Kentucky.

Respectfully,

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