Good afternoon,

Thank you for the opportunity to submit feedback regarding the proposed modifications to the CSBG Annual Report. Community Action of Southern Kentucky's thoughts and suggestions after much review, discussion, and careful consideration of the proposed changes are enclosed.

Individual Module Concerns and Suggestions:
Services (Module 3a)
Employment
- Helping individuals obtain employment is included in the CSBG Act and a core service for many agencies therefore services to explain how employment was obtained should remain (e.g., Job Readiness Training, Resume Development, Interview Skills Training, etc.).

Education
- No comments or suggestions.

Income and Asset Building Services
- No comments or suggestions

Housing
- 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.

Health
- No comments or suggestions

Civic Engagement and Community Involvement
- Why was Leadership Training removed from the services? Volunteer training is provided for FGP, RSVP, SCP and to Head Start parents as they are helping to improve conditions in their communities.

Transportation Domain
- SRV 3d – The number of individuals receiving transportation services supporting income and asset building (e.g.: bus voucher or pass to trainings, etc.). Could these be included in Domain 7 Multiple Domains and not remove these existing supporting services? Case Management, referrals, eligibility determinations.

FNPIs (Module 3b)

Employment
- 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.
- The proposed change unemployed youth/adults who increase skills is not the same as getting a job. Acquiring or increasing skills does not equal getting a job. You can obtain skills and still not obtain a job.

Education
- 2a – The number of young children (0-5) enrolled in childcare or early childhood education services. Enrolling in a service is an output/service not an outcome.
- 2b – The number of youth actively connected to education and skills development program. Being connected is a service, not the outcome.

Income and Asset Building
- 3a – The number of individuals completing income and asset building training. Completing is not an outcome. What happened because of this training? What was the change?
- Home ownership is an important milestone even if reported in low numbers.

Housing
- FNPI 4f – why was 'served with energy assistance' added? Receiving a service is an output.
- Suggest adding the number of individuals who avoided utility disconnect.

Health
- Many of the outcomes in Domain 5 are outputs (services), not outcomes.
- FNPI 5b – The number of individuals with access to health coverage. This is a service. Suggestion: The number of individuals who have health coverage.
- FNPI 5c – The number of individuals receiving reproductive services. This is a service. Suggestion: The number of individuals who have improved skills, knowledge, ability to make decisions related to reproductive health.
- FNPI 5d – The number of individuals receiving wellness services. This is a service. Suggestion: The number of individuals who maintain wellness.
- FNPI 5e – The number of older adults (age 65+) receiving home visiting services. This is a service. Suggestion: keep 5f. The number of older adults who maintain independent living.
- FNPI 5g – The number of adults receiving preventative oral health services. This is a service. Suggestion: The number of adults to maintain oral health.
- FNPI 5h – The number of children receiving preventative oral health services. This is a service. Suggestion: The number of children who maintain oral health.
- FNPI 5i – The number of individuals receiving access to healthy food options. This is a service. Suggestion: The number of individuals who are better able to meet family food needs.
- Suggested removal of current 5d, the number of individuals who improved skills related to the adult role of parents/ caregivers. Improving parenting skills is important to Community Action programs including Head Start and Family Nurturing.

All Characteristics Report (Module 3c)

Household Level Characteristics

- We propose leaving the following in the All Characteristics Report: Single Parent Female and Single Parent Male. This is useful information when applying for certain grants or working with local schools on role modeling initiatives. (e.g., Fatherhood Initiatives, Leading Ladies, etc.).
- We also propose leaving Income Sources. This information allows us to know who we are serving and helps us breakdown myths and stereotypes of who is served.

Overarching Core Concerns:

- Community Action of Southern Kentucky proposes to continue using the CSBG Annual Report 2.1. There will need to be increased funding for local CSBG eligible entities because this change would actually increase the work burden.
- The Kentucky State Office has stated they will not change to the Federal Fiscal Year. CASOKY runs programs on from July 1- June 30 as well. A change to the Federal Fiscal Year will never allow for our money to be correct on Module 2.
- CASOKY feels the proposed changes are breaking down the quality and clarity of ROMA.
- The proposed numbering format of the Modules will lead to confusion for CSBG eligible entities. We believe it would be more beneficial to maintain the existing Module numbering system.
- There will be a huge impact for agencies if we are not able to see the outcomes that clients have reached by using our annual reports. The prosed changes remove our ability to tell the Community Action story of how we impact lives, communities, and help people reach self-sufficiency. We use this information to talk to community leaders, legislators, funders, etc. Results help clarify the importance of what we do (how many people we helped find jobs, how many children are now school ready, how many seniors have been able to maintain an independent living situation). Changing the wording of most of the outcomes to service language (received, enrolled, connected) diminishes the achievements of the outcomes. I have a concern that the quality and effectiveness of the FNPIs and Services may be diminishing.

Your dedication to understanding these issues is very much appreciated by the network. We appreciate your time and consideration in review of these critical matters.

Sincerely,

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