

Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Progress
Report (Office of Management and Budget No. 0970-0492)

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Overall Feedback

With the OCS proposed changes, Iowa Community Action Agencies still have to pull program data from a variety of software systems, therefore the burden will not be reduced much without addressing this difficulty. The proposed report formatting does not give the full picture of all the work Community Action Agencies are doing. Because unduplicated counts are required, there is a high rate of underreporting.

The Iowa Community Action Network would like to see a mix of Outcome Reporting (Through Individual/Family/Community NPIs) and Output Reporting through Individual and Family Services (ideally allowing for duplicated counts as it is more reflective of actual effort by CAAs)

ICAA encourages OCS to collaborate with more intentionality with the Community Action Network to develop a workable report for local, state, and national needs. Methods for collaboration could include an advisory panel or regional focus groups to get a clearer understanding of scope, diversity and impact.

Module 4: Individual and Family Level,

Section A: Individual and Family National Performance Indicators

In general, the Iowa network supports OCS's Proposed 3.0 changes related to the FNPIs, however, we would like to make recommendations regarding some of the proposed changes for NPIs to continue to capture outcomes achieved by customers. Many of OCS's proposed changes replace outcome statements with outputs – the receipt of services. Therefore, our recommendations are to keep or modify NPIs so that they are measurable outcomes achieved by customers and not outputs.

OCS' proposed change is to remove **FNPI 1b**, The number of unemployed adults who obtained employment (up to a living wage). **Our suggestion is to modify FNPI 1b to state: The number of unemployed adults who obtained employment.**

OCS' proposed change to **FNPI 2a**, The number of children (0 to 5) who demonstrated improved emergent literacy skills, to change it to The number of young children (0-5) enrolled in childcare or early childhood education services, **does not provide clarity or quality in the data being reported.** We recommend leaving the FNPI in its original version.

OCS' proposed change to **FNPI 2b**, The number of children (0 to 5) who demonstrated skills for school readiness, to change it to The number of youth actively connected to education and skills development programs, **does not provide clarity or quality in the data being reported.**

"Actively connected" is a service, not an outcome. OCS could consider, The number of youth actively connected to education and skills development programs who are achieving milestones.

Keep FNPI 2f, The number of adults who demonstrated improved basic education.

OCS' proposed **FNPI 2e**, The number of individuals who enrolled in a post-secondary degree program (e.g., associates, bachelors, etc.), is an output, not at outcome. **Eliminate proposed FNPI 2e**.

OCS' proposed FNPI 3a, The number of individuals completing income and asset building training, is an output, not an outcome. Eliminate this NPI and keep FNPI 3h The number of individuals engaged with the Community Action Agency who report improved financial well-being.

Keep FNPI 4h, The number of individuals with improved energy efficiency and/or energy burden reduction in their homes. Changing it to (FNPI 4f) The number of individuals served with energy assistance or energy efficiency homes is an output, not an outcome. Or consider, number of individuals who avoided utility disconnect.

OCS' proposed changes for the FNPIs below are <u>outputs</u> not outcomes. Suggested outcome statements included for each below.

Becomes FNPI 5b. The number of individuals with <u>access</u> to health coverage. Restructured indicators to measures with service delivery. **SUGGESTED CHANGE: The number of individuals who have health coverage.**

Becomes FNPI 5c. The number of individuals <u>receiving</u> reproductive services. Restructured indicators to measures with service delivery. **SUGGESTED CHANGE:** number of individuals who have improved skills, knowledge, related to maternal/child health.

Becomes FNPI 5d. The number of individuals <u>receiving</u> wellness services. Restructured indicators to measures with service delivery. **SUGGESTED CHANGE: Number of individuals who maintain wellness.**

Becomes FNPI 5e. The number of older adults (age 65+) <u>receiving</u> home visiting services. Restructured indicators to measures with service delivery. **SUGGESTED CHANGE: Number of older adults who maintained independent living situation (originally 5f)**

Becomes FNPI 5g. The number of adults <u>receiving</u> preventative oral health services. Restructured indicators to measures with service delivery. **SUGGESTED CHANGE: Number of adults who maintain oral health**

Becomes FNPI 5h. The number of children <u>receiving</u> preventative oral health services. Restructured indicators to measures with service delivery. **SUGGESTED CHANGE: Number of children who maintain oral health**

Becomes FNPI 5i. The number of individuals <u>receiving</u> access to healthy food options. Restructured indicators to measures with service delivery. One suggestion was to accept the change as it would enable us to include food pantry services that previously were not captured in the NPIs; another suggestion was to change it to: Number of individuals who are better able to meet family food needs.

Do Not Remove original FNPI 5f, The number of seniors (65+) who maintained an independent living situation. **Supporting senior independent living is an important part of the Community Action portfolio.**

Recommend keeping something to capture the sphere of these three items for Community Action Agencies who do this important work:

Original FNPI 5g, The number of individuals with disabilities who maintained an independent living situation.

Original FNPI 5h, The number of individuals with a chronic illness who maintained an independent living situation.

Original FNPI 5i, The number of individuals with no recidivating event for six months.

Section B - Individual and Family Services

Overall Comment: Why must we have unduplicated numbers and households served? With bundled services, it makes much more sense to provide a full picture of all services provided to households, not just the numbers served. Community Action Agencies bundle services to really have an impact and that should be a part of the reporting process.

There will be a <u>data burden and deduplication challenges</u> with the proposed changes to the original SRV 1a-1c Vocational Training, On-the-Job and other Work Experience, Youth Summer Work Placements, 3d First-time Homebuyer Counseling, 3g-I Child Support Payments, Health Insurance, Social Security/SSI Payments, Veteran's Benefits, TANF Benefits, SNAP Benefits. Keep original services for these.

SRV 2n The number of individuals attending basic education classes (e.g.: financial literacy)
Recommendation: Since the new SRV 3a includes financial literacy as part of the portfolio of services that align with income management, remove the reference to financial literacy in the new SRV 2n.

SRV 7 – Recommend keeping the referral and advocacy services

Section C – All Characteristics Report

Agree with changes made with the exception of removing the Sources of HH income, other income and non-cash benefits. This data is critical to the CAA story of the families we serve.

Submitted by Iowa Community Action Association representing the following Iowa Community Action Agencies:

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Sincerely,

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