



151 University Dr. P.O. Box 367, West Liberty, Kentucky 41472
Voice: 1-800-927-1833 or (606) 743-3133, Fax: (606) 743-1130
An Equal Opportunity Employer "M/F/D/V"

June 18, 2024

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

Dear OCS,

Our mission at Gateway Community Action is to work closely with community partners, empowering individuals and families in overcoming the causes of poverty through a range of human service programs.

As a CSBG eligible entity, I am writing to express my sincere gratitude for allowing me the opportunity to review the proposed changes to the CSBG Annual Report. Your commitment to ensuring that these changes are thoroughly vetted is greatly appreciated.

After a comprehensive review, I would like to highlight three key points in the areas of process, quality, and burden.

The proposed changes streamline several existing procedures, which is commendable. However, there are aspects where clarity and consistency could be improved to ensure smooth implementation.

- Gateway Community Action offers a recommendation to maintain the use of the annual report 2.1. If this is not feasible, financial assistance will be required to support in updating software systems and providing training and technical assistance. Additionally, increased funding to our agency will be necessary to alleviate the increased workload.
- If our annual report cannot be used to collect outcome results, it will become more cumbersome to our agency when the state and state associations have to contact us to collect the necessary information. This will create a burden for both the state and our agency due to the additional amount of time required to collect data.
- We anticipate challenges with the upcoming launch of the OCS Dashboard. If we fail to highlight the outcomes of our services instead group them together, how will this impact the perception of our work by the public, legislators, and other funding sources? We are concerned that this may undermine the efforts of our agency.

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The revisions aim to enhance the overall quality of our operations. While the intent is clear, there are potential risks that could affect the quality standards we strive to maintain.

- Modifying the language used in describing outcomes to be more service may downplay the achieved. There are worries the FNPI and services losing their quality and effectiveness, which could make it challenging for our agency to address obstacles and accurately showcase the strides we've taken in helping individuals attain economic stability. We recommend that FNPI's are reflective of our outcomes-orientation and do not mix outputs and outcomes.
- We often use the ALL Characteristics Reports to assist us when applying for specific grants. If the Single Parent Female and Single Parent Male is removed, our agency will lose data necessary to conduct daily operations.
- Additionally, we recommend maintaining the All Characteristics Report: Income Source as this report also allows us to identify our clients by income status and report to funding entities.

We believe these changes are diminishing the quality and clarity of ROMA and or PEAAK.

The changes are designed to reduce the burden on our team, yet there are areas where the new requirements might inadvertently increase workload or complexity for certain departments.

- The Kentucky State Office has declared that they will not transition to the federal fiscal year, which will prevent us from aligning correctly with module two.
- The proposed change in module format may cause confusion for our staff. We recommend that retaining the current module numbering system would be more beneficial.
- The expenses relating to upgrading software systems may prove to be quite substantial, posing a significant financial burden to our agency.

I will explain our concerns in more detail below:

Proposed Services (Module 3a)

Employment

1. The metric for the number of unemployed adults who obtained employment has been removed as an FNPI. This indicator is crucial for CSBG eligible entities and is included in

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the CSBG Act. Given its importance, obtaining employment should be included, and additional services explaining 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** –We recommend moving the number of individuals receiving transportation services supporting income and asset building (e.g., bus vouchers or passes to trainings) to Domain 7: Transportation.
2. **NPI 3b** –We recommend adding a SRV for individuals who opened savings accounts/IDAs and other asset-building accounts under the number of individuals who opened a savings account.
3. **NPI 3c** –We recommend adding a SRV for individuals who received homebuyer counseling and other home buying support services under the number of individuals who purchased a home,. Although these services may be covered under the new SRV 3b, we would find it challenging to accurately demonstrate our progress in assisting individuals toward economic security.

Housing

1. **SRV 4g** – The number of households receiving weatherization services does not necessarily align with **FNPI 4f** (The number of individuals served with energy assistance and/or energy-efficient homes.) Energy assistance includes services like LIHEAP and should not be included in weatherization services.
2. **FNPI 4** – Is it assumed that the number of individuals served with improved water safety in their homes would be achieved if someone received water safety services included in **SRV 4f** (The number of individuals receiving housing maintenance and improvement services? We recommend clarification.

Civic Engagement and Community Involvement

1. Leadership Training was removed from the services and we feel leadership training is a strategic investment that yields significant benefits across various dimensions of any organization, from enhancing performance and innovation to improving employee engagement and retention.

Transportation Domain

1. **SRV 3d** – The number of individuals receiving transportation services supporting income and asset building (e.g., bus vouchers or passes to training). Should this be moved to Domain 7: Transportation?

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Multiple Domains

1. Why was Case Management, referrals, and eligibility determinations removed? Removing services under Multiple Domains reduces the scope of our work.

Proposed FNPIs (Module 3b)

Employment

1. We recommend keeping the number of unemployed adults who obtained employment. This is a very important indicator for our agency and is part of the CSBG Act.

Education

1. **2a** – The number of young children (0-5) enrolled in childcare or early childhood education services is an output, not an outcome.
2. **2b** – The number of youth actively connected to education and skills development programs is a service, not an outcome.
3. **2e** – The number of individuals who enrolled in post-secondary degree programs (e.g., associate's, bachelor's, etc.). Again, enrolling does not equate to achieving, therefore, this is a service.

Income and Asset Building

1. **3a** – Completing a training does not necessarily mean achieving an outcome.
2. **NPI 3b** does not have services to match this indicator.

Housing

1. **FNPI 4f** – “served with energy assistance” was a Weatherization outcome. It appears as if it may now include LIHEAP assistance. If this is the case, LIHEAP assistance is an output (service), not an outcome.
2. **FNPI 4g** – Is “Individuals served with improved water safety in their homes” related to LIHWAP? If so, individuals served would be an output (service), not an outcome.

Health

1. Domain 5 only includes outputs (services). We are in the business of tracking outcomes as it is our role to help individuals gain economic stability. Outputs are included in FNPI 5b, FNPI 5c, FNPI 5d, FNPI 5e, FNPI 5g, FNPI 5h, and FNPI 5i. We recommend revising this domain to include outcomes.





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2. We recommend adding 5f back to this domain as the number of seniors (65+) who maintained an independent living situation is an important FNPI and allows us to use this data for grant writing purposes.

Proposed All Characteristics Report (Module 3c)

Household Level Characteristics

1. We propose retaining: Single Parent Female and Single Parent Male. We often use the ALL Characteristics Reports to assist us when applying for specific grants. If the Single Parent Female and Single Parent Male is removed, our agency will be lose data necessary to conduct daily operations
2. We propose retaining: Income Sources as this report also allows us to identify our clients by income status and report to funding entities.

Once again, I appreciate the opportunity to review these changes and provide feedback. Your openness to input ensures that we can collaboratively refine these changes for the betterment of our organization. Thank you for your attention to these matters. I look forward to continued collaboration.

Respectfully,

Martina Roe, CEO
Gateway Community Action

