

June 20, 2024

Dr. Lanique Howard, Director Office of Community Services
Administration for Children and Families
U.S. Department of Health & Human Services
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) / ACF-OCS-
CSBG-DCL-24-09 Annual Report 3.0 Revisions

Dear Dr. Howard and OCS Colleagues,

Central Missouri Community Action (CMCA) appreciates the opportunity to provide comment on the proposed changes to data collection for Community Services Block Grant (CSBG) Annual Report. CMCA is one of nineteen Community Action Agencies (CAA) serving Missouri. We are guided by the national Promise of Community Action and our own agency mission: *building relationships to empower people, strengthen resilience, and improve the quality of life for all members of the community*. CMCA served 15,790 individuals in 7,199 households last fiscal year. While serving these individuals we in turn are improving economic stability in the eight counties we serve. CMCA's Theory of change demonstrates our desire to see thriving communities in moving families from poverty to resilience by wrapping economic stability, family well-being and social connection programs and coaching models around those we serve.

CMCA understands the proposed revisions to OMB Annual Report from the Office of Community Services were designed to streamline state administrative information collection and National Performance Indicators while also reducing burden on State offices and designated CAA's. We recognize and appreciate OCS's intent to clarify and reduce required data collection. However, we have significant concerns that the proposed changes will *not* reduce the administrative burden as intended.

The following highlight and summarize priority comments, concerns and recommendations based on how OCS Annual Report 3.0 proposed changes will directly impact CMCA and many others in the Community Action network:

- The proposed changes outlined in the CSBG Annual Report 3.0 overall do not reflect understanding of the breadth and depth of blended services provided to our families

and minimizes the importance of community level initiatives by CMCA and Community Action agencies around the nation.

- It is crucial for agencies to be able to *individualize* their Community Services Block Grant (CSBG) funds to create plans to address the needs that arise from the triennial Community Needs Assessment (CNA) process through their internal Strategic Plan. The CSBG Act *requires* CAA's to develop services and community initiatives in direct response to identified community needs. The needs and strengths are vastly different between geographic regions in the United States, and the current selection of CSBG NPIs and services allows us to reflect our unique combination of services within the current Annual Report 2.1.
- CSBG National Program Goals are clearly identified in the CSBG Act to 1) reduce poverty, 2) empower low-income families and individuals to become self-sufficient, and 3) revitalize low-income communities (42 U.S.C. § 9901(1)). Performance measures 12A and 12B outline both *individual* developmental outcomes as well as *community*-wide transformation initiatives to address the causes and conditions of poverty. The proposed change to CSBG Annual Report 3.0, with the current Module 4 (Individual and Family Level) becoming Module 3, and the current Module 3 (Community Level Transformation) becoming Module 4 creates concern for us. *Community level transformation is not a suggestion, but rather a defining factor of the Community Action movement.* Relocation of the Community Level Transformation module to Module 4 may seem like a minor change, however it further devalues the importance of the innovative initiatives operating and serving our communities. If we are not reporting our community level outcomes, OCS will not have the required data to report to the Government Accountability Office (GAO) regarding Performance Measure 12B.
 - CMCA recommends OCS keep the order of Module 1, 2, 3 and 4 as they are currently written in CSBG Annual Report 2.1. Furthermore, we urge OCS to consider *requiring* Community Level Transformation (current Annual Report 2.1 Module 3).
- CMCA received the April 22, 2024, Dear Colleague letter ACF-OCS-DCL-24-09-Annual Report 3.0 Revisions along with a CSBG Annual Report Disposition Indicator List with all proposed revisions. OCS is proposing a decrease in FNPIs reported in CSBG Annual Report 3.0. Unintentionally OCS is thereby limiting CAA reportable outcomes, requiring financial resources and staff time for training, as well as necessary data system updates. This change runs the risk of weakening the connections between our unique set of services, outputs and outcomes, most notably in our **Whole Family Approach model**, *requiring* a bundled services approach to move families toward self-reliance. We understand that agency choice remains to collect additional data at the local level in the proposed Annual Report

3.0. CMCA respectfully requests OCS engage the Community Action Network and experts in the field to discuss any changes in services or outcomes (FNPIs) prior to finalizing Annual Report 3.0 revisions. This ensures you are offering agencies the ability to present a picture of our overall performance. The current CSBG Annual Report Disposition Indicator List eliminates our ability to show unique programmatic blending and braiding of services to obtain family outcomes.

- **Specific recommendations to the proposed outcome (FNPI) changes in CSBG Annual Report 2.1 include:**
 - CMCA recommends keeping “z” level indicators in the Annual Report 3.0. This allows individualization of our services. These specific indicators allow us to record measurable gains or losses in innovative programming and evaluate their effectiveness.
 - CMCA recommends leaving FNPI 1b: *The number of unemployed adults who obtained employment* with slight written revisions as it is not necessary to differentiate between 1b and 1e if the option to record “obtained employment” remains and is clearly distinguished between youth (up to age 24) and adults (over age 24).
 - CMCA agrees with the elimination of FNPI 1c, 1d, 1f and 1g, as it has been burdensome measuring employment retainment on the schedule required in Annual Report 2.1. We do see the importance of measuring employment retainment and recommend keeping an employment retention FNPI to measure adults who maintain employment for 90 days.
 - CMCA recommends keeping FNPI 2d: *The number of children and youth who are achieving at basic grade level (academic, social, and other school success skills)*. This outcome is used at our agency and assists in showing the impact of our Whole Family Approach and Head Start programs. It is unnecessary to break down this data point by grade level. Keeping FNPI 2d without grade level specification will reduce the administrative burden while allowing us to continue reporting this critical outcome.
 - CMCA recommends FNPI 2e: *The number of parents/caregivers who improved their home environments* remains as written. Working in close partnership with Children’s Division and child abuse prevention, the home environment is often a focus of goal development in our Whole Family Approach.
 - CMCA operates a Financial Opportunity Center as well as a Women’s Business Center. The changes proposed in *FNPI goal area 3* is quite limiting and does not capture the breadth and scope of our financial focus. CMCA recommends not changing any current Income domain NPIs as they are written in Annual Report 2.1.

- CMCA recommends keeping FNPI 5d: *The number of individuals who improved skills related to the adult role of parents/caregivers*. Working in close partnership with Children's Division and with a focus on child abuse prevention, the relationship between guardians and children is of utmost importance in serving the whole family.
- **CSBG Annual Report 2.1 Module 4 Section B recommendations regarding Services (SRV):**
 - CMCA recommends keeping all SRV 1a-1q (Employment Services) as written. While we support the consolidation of reportable services in the CSBG Annual Report 3.0, the *Employment* domain services SRV 1a-q are *vital* to telling the story of our families working toward career goals. The proposed revision of services is limited to outputs and appears to devalue the coaching model we have worked tirelessly to implement at CMCA.
 - CMCA recommends keeping SRV 2l-SRV2q (*Adult Education & Skill Development Programs*) as currently written in CSBG Annual Report 2.1. This proposed change has eliminated *parenting supports* and *post-secondary education*, both key elements to our Whole Family Approach model at CMCA.
 - CMCA recommends wording revision to SRV 2cc *Home Visits (Home Visits)* to "*The number of families participating in evidence-informed home visiting services.*" CMCA operates robust home visiting programs, within our Early Head Start, Homebased Early Head Start, Head Start and BRIDGE programs at CMCA. Nearly 60 years operating the two-generation approach has led us to forming our current Whole Family Approach model, which requires a home visit component for some elements of our model.
 - CMCA recommends keeping SRV 3a, 3b, 3c, 3e, 3f, 3m, 3n and 3o (*Income Management and Asset Building*) to avoid reducing the vital importance and impact of a variety of financial and income services provided to our members. CMCA operates a nationally recognized Rural LISC Financial Opportunity Center (FOC), requiring us to use *all* of the currently available services in our FOC delivery model as we help members work toward economic growth goals.
 - CMCA recommends SRV 3b, *the number of individuals that received business and entrepreneurial financial services*, should **not** be connected to a "concrete support." CMCA operates the Missouri Women's Business Center (WBC), employing business coaches to help with business start up and more recently partnered with the local Regional Economic Development to start a retail incubator in downtown Columbia, MO. The coaching work done in the WBC is individualized to each business owner and often stretches for long periods of

time over multiple coaching sessions. It is imperative we can tell the story of small business owner success in our CSBG Annual Report 3.0

- CMCA recommends deleting Annual Report 2.1 *SRV 3d-Services Supporting Income and Asset Building*- as it is subjective and lacks clarity in practice.
- CMCA recommends keeping *SRV 4a-4b Housing Payment Assistance* to show direct financial assistance provided as currently written in Annual Report 2.1. This category of the annual report is used for other funding sources who directly fund housing financial assistance at CMCA. A change in the report in this category will cause an unnecessary agency burden.
- CMCA recommends wording revision of *SRV 4c* to “Eviction Prevention Coaching” instead of Annual Report 2.1 wording “Eviction Prevention Services.” This wording change is preferred over eliminating it completely from Annual Report 3.0. Our CMCA “Coach approach” model is built on a strengths-based theory of change with housing stability and eviction prevention seen as a priority need for our community members.
- CMCA recommends keeping *SRV 4f-Housing Placement and Rapid Rehousing* and *SRV 4g-Weatherization* as currently written in CSBG Annual Report 2.1. Any change will affect our annual reporting with the contracted Management Information System. We currently record home repairs outside Weatherization funded services in *SRV 4f*.
- Reinstate *SRV 6b- Leadership Training* as currently written in CSBG Annual Report 2.1. CMCA holds Step Up to Leadership training for our low-income members to learn civic engagement and leadership skills. We are able to recruit low-income board members for both our own non-profit and other partner agencies in our communities once they have completed the 12 week course. The CSBG Act clearly articulates the requirement to engage and empower low-income persons and revitalize communities. Removing Leadership Training eliminates our capacity to report the work done in this domain area.
- CMCA recommends refinement in the language in the *Service to Outcome Plan* to clearly demonstrate that concrete economic supports are not only tangible services to support economic mobility, but also address economic security or ongoing stability.
- CMCA recommends reconsideration of adding a new Transportation domain to Annual Report 3.0. Transportation initiatives should largely remain reported at the community level (CSBG Annual Report 2.1 Module 3) to avoid administrative burden on collecting individual passenger information for large scale transportation initiatives. CMCA recommends the continued use of *SRV 7a – 7e (Transportation)* for capturing individual level outcomes for annual reporting purposes.

- CMCA recommends reinstating the requirement to capture both single parent female and single parent male designated households for *CSBG Annual Report 3.0 Module 3, Section B, D- Household Characteristics, 9) Household Type*. This data allows CMCA to make informed decisions regarding the population we are serving and align programmatic goals to fit with the population demographics. This information can also help inform other grant opportunities that will add value to the specified single parent population array of available services.
- CMCA recommends retaining the household income source data point in demographics reporting in *CSBG Annual Report 3.0 Module 3 Section C: All Characteristics Report, D.13*. It is imperative in working with individuals toward economic upward mobility in our Financial Opportunity Center we are able to capture sources we categorize as “income supports,” (i.e. SNAP, TANF, WIC, HCV-formally Section 8). We measure success through increasing earned net income and reducing household debt. By recording a household’s sources of income, we can better establish a budget and then tell the story behind someone’s economic mobility journey within our Financial Opportunity Center. Understanding these income sources also helps our Coaches navigate the cliff benefits effect with our members to prepare to reduce dependence on public assistance.

In closing, Central Missouri Community Action (CMCA) appreciates the opportunity provided by the Office of Community Services to provide feedback on the proposed CSBG Annual Report version 3.0. We hope you will carefully review and consider the feedback provided in making final decisions that impact the overall health and well-being of the Community Action Network.

Please feel free to contact either of us signed below regarding any additional questions or clarification needed.

In Partnership,

A handwritten signature in blue ink that reads "Darin Preis".

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