

**To Whom It May Concern,**

**We would like to first and foremost thank you for giving us the opportunity to submit our concerns on the proposed modifications to the CSBG Annual Report.**

**We believe that we should 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. There should also be more funding for local CSBG eligible entities.**

**The Kentucky State Office has stated they will not change to the Federal Fiscal Year. With this being said, that will never allow for our money to be correct on Module 2.**

**The proposed numbering format of the Modules will lead to confusion for CSBG eligible entities. I believe 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).**

**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.**

**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. An agency will encounter difficulties in accurately demonstrating the progress they have made in assisting individuals towards economic security.**

**We believe that we should leave the following in the All Characteristics Report: Single Parent Female and Single Parent Male. This is useful for many agencies when applying for certain grants (e.g., Fatherhood Initiatives, etc.).**

**We believe that by leaving Income Sources in the All Characteristics Report allows our agency to know who we are serving and helps to breakdown myths of who is served.**

## **Proposed Services (Module 3a)**

### **Employment**

1. The number of unemployed adults who obtained employment has been removed as a FNPI. This is one of the main indicators for CSBG eligible entities, and it is part of the CSBG Act  
Obtaining 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.).

### **Education**

1. We have no comment.

### **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.). May need to be moved to Domain 7 Transportation

### **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.

### **Health**

### **Civic Engagement and Community Involvement**

1. Why would Leadership Training be 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.). May need to be moved to Domain 7 Transportation

### **Multiple Domains**

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

## **Proposed FNPis (Module 3b)**

### **Employment**

1. The number of unemployed adults who obtained employment has been removed. This is another main 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. This would be service not an outcome, just being enrolled doesn't mean they complete.
2. 2b – The number of youth actively connected to education and skills development program. This would be a service, not the outcome, just being connected doesn't mean they accomplish an outcome.
3. 2e – The number of individuals who enrolled in post-secondary degree program (e.g., associates, bachelors, etc.) Again, being enrolled doesn't mean they complete.

## **Income and Asset Building**

1. 3a – The number of individuals completing income and asset building training. Complete a training does not mean accomplishing an outcome, what did they accomplish from completing training.
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? This would be a service, not an outcome.

## **Health**

Many of the outcomes in Domain 5 are outputs (services), not outcomes.

1. FNPI 5b – The number of individuals with access to health coverage. This is a service
2. FNPI 5c – The number of individuals receiving reproductive services. This is a service
3. FNPI 5d – The number of individuals receiving wellness services. This is a service
4. FNPI 5e – The number of older adults (age 65+) receiving home visiting services. This is a service
5. FNPI 5g – The number of adults receiving preventative oral health services. This is a service
6. FNPI 5h – The number of children receiving preventative oral health services. This is a service
7. FNPI 5i – The number of individuals receiving access to healthy food options. This is a service
8. Why was the old 5f removed (The number of seniors (65+) who maintained an independent living situation)? To our agency supporting senior independent living, this is an important FNPI.

We deeply appreciate your time and consideration on addressing our concerns on these important matters. Your commitment to understanding and confronting these concerns is greatly valued by Northeast Community Action Agency.

Respectfully Yours,

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