Executive Director Charlaine Mazzei, MSW

- Senior Nutrition Services
- Low-Income Utility Assistance
- Information & Referral
- Redwood Cove Senior Apartments
- Homeless Services

DEL NORTE SENIOR CENTER

SERVING DEL NORTE COUNTY SINCE 1976

June 16, 2024

Administration for Children and Families
Office of Community Services
Community Services Block Grant
330 C St SW
Washington, DC 20201-0001

infocollection@acf.hhs.gov.

Response to Community Services Block Grant (CSBG) Annual Progress Report, OMB #0970-0492

On behalf of the Del Norte Senior Center – Community Action Partnership of Del Norte (DNSC), I am writing to formally offer comment on the proposed changes to the Community Services Block Grant (CSBG) Annual Progress Report OMB #0970-0492.

DNSC is a small agency in Del Norte County, California on the far northern coast of California, just south of the Oregon border. Although renowned for majestic Redwood forests and stunning coastlines, the area is also plagued by a high poverty rate and significant barriers to economic growth and stability. CSBG funding makes up a critically high percentage of our agency's annual budget, and supports programs that serve seniors, the homeless and other vulnerable low-income residents of our community.

DNSC welcomes the opportunity to comment on the changes to the CSBG Annual Progress Report being proposed by the Office of Community Services (OCS); however, it would have been ideal if the national Community Action Network of agencies and associations had been consulted earlier in the revision process. In the true spirit of ROMA and CSBG's emphasis on working with those most impacted by policy decisions, earlier involvement of those who do the work, gather the information and prepare these reports should have been a critical step in insuring the most relevant results. DNSC respectfully requests that the proposed revision to the annual report not be approved until meaningful engagement with CSBG Eligible Entities has taken place.

DNSC appreciates the efforts to simplify the annual reporting process. Each agency will have to make an analysis of whether the reduction in reportable services and performance indicators will impair their ability to accurately report the impact they have in their communities. DNSC supports the idea that each agency should have sufficient opportunity to accurately report its programs, services and impact. To that end, DNSC supports the comments of other state administrating agencies, regional and state associations and local CSBG eligible entities. For DNSC, specific comments are as follows:

IS THE PROPOSED COLLECTION OF INFORMATION NECESSARY FOR THE PROPER PERFORMANCE MEASUREMENT OF FEDERAL, STATE OR LOCAL AGENCIES.

DNSC agrees that collection of information on CSBG Eligible Entity performance is necessary to promote accountability for federal funds and to educate decision-makers on the necessity, impact and effectiveness of CSBG. The primary question here is whether the information being collected in the proposed revision is the correct data to properly measure performance. Specific comments on the individual data elements will be addressed later in this letter; however, in general, OCS has shifted the FNPI's away from reporting outcomes to reporting process measures such as enrollments, engagements and other non-outcome metrics. In some cases, active participation in a service may be assumed to lead to a desired outcome, but in wherever possible, actual outcomes should be measured and reported.

THE QUALITY OF INFORMATION COLLECTED.

DNSC is concerned that the proposed FNPI's will reduce the quality of information being collected primarily because many of the new indicators measure service delivery and not outcomes. While outcomes can be more difficult to track and measure, that is no reason to abandon them. Adjusting the expectations of how improvement outcomes are documented and supported will allow OCS to retain an emphasis on outcomes without overly burdening agencies with reinventing evaluations of programs that are already based on nationally recognized, evidence-based best practices. Allowing the use of "proxy" indicators to document assumed outcomes will simplify the reporting process without sacrificing a focus on desired outcomes. For example, participants in senior exercise programs can be assumed to improve their well-being because valid studies have shown that to be true. There should not be a need to further "prove" this with extensive client evaluations at the agency level.

DNSC is also concerned that the effort to artificially link services to specific individual outcomes as outlined in the Services to Outcomes plan will seriously degrade the quality of outcome data. While DNSC understands that OCS is attempting to assist agencies – or perhaps its own staff – connect services to outcomes, we strongly disagree with the resulting plan that pigeonholes services into single outcomes. The table shows that multiple services can support a single outcome, but in only two instances does the plan acknowledge that a single service can support more than one outcome.

This attempt to overly simplify the impact of services appears to have resulted in a manipulation of outcomes to match services so that enrollment in a service becomes the outcome. It has also led to the characterization of some services as lacking in outcomes ("concrete supports"), when in fact, those services clearly support multiple outcomes, often in different domains.

It appears that OCS may be trying to force a match between the number of individuals reported in Module 3, Section A, Services and the number of individuals reported in Module 3, Section B, Indicators. Perhaps this is an attempt to prevent the reporting of services without also reporting outcomes. Many of us have had to report in this way because of the unreasonable expectations for outcome documentation imposed by state monitors.

OCS should understand that expecting an exact match between individuals served and the outcomes achieved is not realistic. Attempting to force such a match will lead to confusion, bad data, multiple report revisions and a distortion of the realities of providing the types of services Community Action supports. Reporting of services and outcome numbers must be independent and only loosely correlated. An individual can participate in multiple services. They will be counted in the reporting for each service in Section A. If that individual only achieves one outcome, they are only counted once in Section B. Likewise, an individual can be served with a single service (counted once in Section A) and achieve multiple outcomes (counted more than once in Section B).

DNSC strongly recommends that OCS significantly revise the Services to Outcome plan to acknowledge that services can have multiple outcomes, and that all services support outcomes. OCS should also provide the plan strictly as an educational support to help agencies make a connection between services and outcomes. OCS should NOT expect service delivery reporting and outcome reporting to yield identical numbers.

THE CLARITY OF THE INFORMATION TO BE COLLECTED.

In general, DNSC finds the new report to be an improvement in clarity over the previous version. Specific suggestions for additional clarity are offered later in this letter.

DOES THE INFORMATION TO BE COLLECTED PRODUCE A SIGNIFICANT BURDEN? IF SO, HOW COULD THE BURDEN BE MINIMIZED ON RESPONDENTS, INCLUDING THROUGH THE USE OF AUTOMATED COLLECTION TECHNIQUES OR OTHER FORMS OF TECHNOLOGY?

The information to be collected on the All Characteristics Report produces a significant burden because it is not possible to compile a completely unduplicated count of the number and demographics of individuals and families who are served by an entire Community Action Agency, its subrecipients and its significant partners.

Each Community Action Agency operates an infinitely diverse combination of state, federal, local and private poverty reduction programs. Each of these programs have different eligibility criteria, demographic data collection elements, and – most importantly – different mandated software systems for collecting data, managing services and reporting outcomes.

In our own small agency, we use five different software systems. Most clients appear in at least two of these systems. Many clients are in three or more. It is not possible to prevent counting the client who appears in two or more systems two or more times because these systems do not share data with each other. As an example, we operate a senior nutrition program administered by the California Department of Aging (CDA). CDA mandates that we use a specific database designed specifically to manage the program. DNSC also operates the Low-Income Household Energy Assistance Program (LIHEAP). We are required to use one of two available databases designed specifically to manage that program. The two program-specific databases are incompatible with each other and cannot share data.

If a single client is served in both programs, they will appear in both databases. When demographic reports are run from each program, that client will be included in both reports. Adding the two demographic reports together will result in double-counting any client who was served by both programs. Choosing only one program to use for demographic reporting will result in undercounting the clients who only participated in the program we chose NOT to report.

There is no easy way to account for these duplicated clients. Trying to run lists and manually identify duplicates is prohibitively time consuming. The larger the agency, the more programs being operated, the more difficult such a task would be. There is currently no automated way to take data from disparate systems and combine it into a single report. This is due, in part, to the fact that each program categorizes demographics differently. In order for an automated reconciliation system to work, the data points have to be identical, which they are not. Race and ethnicity are often grouped differently, as are gender, age and income. Programs do not consistently collect the same data for health insurance coverage, employment status or any other demographics.

Trying to solve this problem by enforcing a single database into which all clients must be entered would create a nightmare of duplicate data entry that would be costly, an unproductive use of resources and likely to create data-entry errors.

OCS has been informed of these difficulties for years but has not offered clear or consistent direction as to how the All Characteristics Report should be complete in a way that acknowledges either underreporting or overreporting.

THE ACCURACY OF THE AGENCY'S ESTIMATE OF THE BURDEN OF THE PROPOSED COLLECTION OF DATA.

DNSC does not believe that OCS's estimate of the burden of the proposed data collection is accurate, especially with respect to the All Characteristics Report. OCS has failed to take into account the difficulties discussed above when agencies must use disparate data collection systems to operate their programs and these data collection systems cannot produce integrated data.

With respect to the reporting burden related to services and performance indicators, DNSC does not anticipate as significant a reduction in the time or effort needed to collect reportable data as is being estimated by OCS. The actual entry of data into the annual report may be simpler, but the same data will need to be collected in the same way as before. It will just be entered in differently configured service categories and performance indicators.

Finally, DNSC does not believe that OCS has accurately estimated the burden of reconfiguring automated systems that have already been designed to conform to current reporting arrangements. Costs will be incurred to make the changes proposed here. Those costs should not have to be borne by states and local agencies out of already tight CSBG allocations. OCS should present a plan for how these automation changes will be supported.

WHAT ADDITIONS, REVISIONS OR MODIFICATIONS TO THE INFORMATION COLLECTION IS SUGGESTED?

Module 1 – State Administration
DNSC does not have specific comments regarding changes to the State Administration portion of the proposed reporting format. DNSC asks OCS to work with states to insure that additional burdens are not imposed as the state collects reportable data from local agencies.

Module 2 – Eligible Entity Expenditures, Capacity and Resources

Section A: CSBG Expenditures by CSBG Eligible Entity

In general, OCS needs to gather more information and provide more clarity on how the change to reporting on a Federal Fiscal Year will impact states and local agencies who do not already report in this way. If OCS anticipates that state contracting and fund distribution will also follow the FFY, then DNSC does not support this change. The vagaries of the Federal budgeting and funds release processes are such that local agencies cannot rely on timely receipt of funds to support critical needs if contracts are based on a FFY. If, however, OCS is simply asking that whatever CSBG funds were expended during the FFY be reported, regardless of the year from which the funds were released, then this change may not be as impactful.

Report Field A.1.
Separating out the types of CSBG expenditures into Allocation, Carryover and Discretionary has the potential to increase erroneous reporting. DNSC questions the value of this separation.

Report Field A.2.
DNSC disagrees with the removal of the option to report expenditures supporting multiple domains. Much of our CSBG funding supports first-line management, clerical, janitorial, and maintenance staff, building maintenance, utilities and other common costs. These expenditures support all of the activities of the agency and cannot be easily allocated to a specific domain.

Section B: CSBG Eligible Entity Capacity Building
DNSC is aware that some agencies are not in favor of removing the agency staff certification section because it is seen as an opportunity to report on the professional-level capacity of their organizations. DNSC is in favor of removing that section as it is not relevant to the skill sets of our staff. It is one less set of data to report.

Report Field B.5.
DNSC questions the utility of this section. While it may be desirable to show that CSBG Eligible Entities are actively entering into partnerships, counting or categorizing those partnerships is not a focus of our work.

Section C: Allocated Resources per CSBG Eligible Entity
DNSC recommends replacing the word "Allocated" with the word "Expended". It is not accurate to try to report funds that may have been allocated to an agency, but not expended within any reporting period. I believe there is a lack of clarity and some agencies may be trying

to account for their entire contracted available funding amounts, while others are only reporting what was actually spent in support of services and outcomes. There is no utility in reporting unspent funds that may have been available during the reporting period. Reporting on available but unspent funds does nothing to provide information on the cost of services and can obscure what programs actually cost. Clearly instructing agencies that they are to report on expended funds will simplify the accounting process and insure consistent data on the actual costs of the services being reported.

Module 3, Individual and Family Level

DNSC supports the reorganization of the reporting format to put Individual and Family Services as Module 3; however, the impact on automated systems that may need reconfiguration because of this change should be taken into consideration.

In general, DNSC would like to see sections added to the services module that would allow for units other than individuals served to be reported. In many cases, service volume is a more compelling and accurate reflection of the impact an entity has on its community. Some examples of service units that could be included are meals served, pounds of food distributed, number of food boxes distributed, number of hygiene services provided, etc. Reporting used to be allowed for these types of service units in previous versions of the annual report but were removed with the current version. We would like to see them returned.

Section A: Individual and Family Services

DNSC would like to see Case Management returned as a service, potentially under Domain 5. This is a critical function that provides holistic services to individuals who need to access multiple supports in order to achieve stability. Outcomes for Case Management can be reported within the FNPI that corresponds to each service in which the client participated.

Domain 1: Employment Services No suggestions

Domain 2: Education, Childcare and Youth Development Services No suggestions.

Domain 3: Income and Asset Building Services

SRV 3d. Should be removed. Transportation has been created as a separate domain. In addition, tracking the purposes for which transportation is being provided is often not possible, as will be discussed more fully in comments on the Transportation domain.

Domain 4: Housing Services

SRV 4a. Remove the word "emergency" from the parenthetical description. Agencies who operate ongoing housing subsidy services should be clear that they can report ongoing rental payments in this section.

SRV 4b. Same as above. Remove the word "emergency".

<u>Domain 5: Health and Nutrition Services</u>

Parenting classes, currently in Module 4, Section B, SRV 5mm, need to be reinstated. This is an important service in preventing intergenerational trauma and poor educational outcomes.

SRV 5d. Remove the qualifier (age 65+) from the definition of services. Programs serving "seniors" have different age eligibility standards that often include those younger than 65. Older Americans Act defines eligibility for senior services as 60+. HUD defines senior housing eligibility as 62+. Agencies need to be able to report all participants that were served according to the guidelines of the specific program(s) being operated. Suggest replacing the current description with the term, "older adults" as is used in SRV 5i.

SRV 5j. Same as above. Remove the qualifier (age 65+) from the definition of services.

<u>Domain 6: Civic Engagement and Community Involvement Services</u>

DNSC would like to see a service entitled, "The number of individuals participating in community engagement and organizing training."

SRV 6c. Self-sufficiency services are not civic engagement activities. This service is more appropriately place in Domain 3: Income and Asset Building.

<u>Domain 7: Transportation Services</u>

DNSC supports separately tracking the types of transportation support being distributed, but recommends removing SRV 7c. and SRV 7d. Trying to determine the specific use a low-income person makes of transportation support is not always possible. If an agency gives a participant a monthly bus pass, that single support could be used for multiple purposes, including going to school or job training, work, medical appointments, shopping or to access other services.

Section B: Individual and Family NPIs

General Comment:
DNSC strongly recommends that all domains retain the ability to add "Other" outcomes to the report. This is currently available and clearly had efficacy in informing OCS of potential outcomes that needed to be added to reporting.

General Comment:
All FNPI's should clearly specify (or it should be stated in instructions) that the reported outcomes are for participants who are served by Community Action, whether through direct services, subcontracts or significant partnerships. As currently written, the FNPI's could be interpreted to require data on all members of a service territory, whether or not they are participants in Community Action programs. This is not feasible, is beyond the scope of local agencies to accomplish, and could damage credibility if Community Action is seen to be trying to take credit for outcomes in which it had little to no actual influence.

General Comment:
Please remove the Target and Performance Target Accuracy columns. Estimating performance at the beginning of a reporting period is challenging at best. Requiring individual agency estimated targets and explanations when those targets are not met or are exceeded does not add value to federal reporting that rolls up nationwide data. These fields simply add to the reporting burden and provide areas in which agency, state and federal staff must follow-up when questions arise.

General Comment:
Please remove the benchmarking from prior years to current year reporting. Again, service levels and needs change regularly and requiring individual agency explanations when these shifts occur does not add value to aggregated federal reporting.

General Comment:
For FNPI's that report intangible outcomes, such as increased wellness, OCS must be very clear with states that monitoring reported achievements should not require agencies to produce pre- and post-tests, surveys or other research-like documentation when the programs in use are already nationally recognized as evidence-based best practices. For example, national-level research has clearly shown that home visiting services increase senior well-being and ability to remain independently in their own homes. Likewise, it is nationally recognized that access to primary medical care improves long-term health outcomes that agencies are not in a position to measure. Active participation in these best-practice services should be allowed to stand alone as proxy outcomes without the need to document participant's increased feelings of well-being or obtain medical records showing better health. In some cases, a state's insistence on documentation of health and well-being documentation has led to underreporting of outcomes because agencies do not have the capacity to provide the state's desired documentation. It is less burdensome to stop reporting the outcome than it is to meet the state's expectations.

FNPI 1: Employment

While DNSC agrees with simplifying the FNPI's in this section to remove reporting of different time frames, we disagree with deletion of all FNPI's that report attained and maintained employment. Reporting only skills acquisition is insufficient. In addition, FNPI 1c. is awkwardly written and difficult to track. DNSC respectfully requests that the FNPI's for this domain be as follows:

FNPI 1a. Remains as written.

FNPI 1b. Remains as written.

FNPI 1c. **Add**: Number of unemployed youth who obtained and maintained employment during the reporting period.

FNPI 1d. **Add:** Number of unemployed adults who obtained and maintained employment during the reporting period.

FNPI 1e. **Add:** Number of employed individuals who maintained employment during the reporting period.

FNPI 1f. **Rewrite:** Number of employed individuals who increased wage or salary income from employment during the reporting period.

FNPI 2: Education and Youth Development Indicators

Enrollment in and connection to programs are not outcomes. Several proposed FNPI's need to be rewritten to show achievement of an outcome. Numbers of individuals enrolled are reported in column I.) number of individuals served. DNSC respectfully requests that the FNPI's for this domain be as follows:

FNPI 2a. **Rewrite:** Number of children age 0 to 5 served who achieve age-appropriate school readiness benchmarks. (Number of children enrolled in early childhood programs is reported in column I.)

FNPI 2b. **Rewrite:** Number of youth served who achieved grade-level academic benchmarks. (Number of youth connected to education is reported in column I.)

FNPI 2c. Remains as written.

FNPI 2d. Remains as written.

FNPI 2e. **Delete**: Enrollment in a program is not an outcome.

FNPI 2f. Remains as written. (Number of individuals enrolled in post-secondary education is reported in column I.)

FNPI 3: Income and Asset Building Indicators

Completion of training and opening accounts are not outcomes. As stated above, the number of individuals enrolled in services is reported in column I.). DNSC respectfully requests that the FNPI's for this domain be as follows:

FNPI 3a **Rewrite:** Number of individuals served by Community Action income and asset building training who achieve and maintain financial stability during the reporting period. (Number enrolled is reported in column I.)

FNPI 3b **Rewrite:** The number of individuals served by Community Action who open and maintain contributions to a savings or individual development account during the reporting period. (Those who only open an account, but do not maintain contributions would be reported in column I.)

FNPI 3c. Remains as written; however, is a home the only asset that should be reported?

FNPI 4: Housing Indicators

While DNSC agrees with simplifying the FNPI's in this section to remove reporting of different time frames, we disagree with deletion of all FNPI's that report non-emergency housing and housing retention outcomes. Reporting only emergency or short-term outcomes is insufficient. In addition, FNPI 4e is awkwardly written, FNPI 4f mixes outcome types and FNPI 4g could be combined with a rewritten FNPI 4e. DNSC respectfully requests that the FNPI's for this domain be as follows:

FNPI 4a. Remains as written.

FNPI 4b. **Rewrite:** The number of individuals who obtained and/or maintained safe and affordable housing.

FNPI 4c. Remains as written.

FNPI 4d. Remains as written.

FNPI 4e. **Rewrite:** The number of individuals who experienced improved health, safety and energy efficiency due to weatherization, lead and radon abatement; reduction in fire and electrical hazards; installation of grab bars and wheelchair ramps; home heating and water heating repair/replacement and other improvements to their homes.

FNPI 4f. **Rewrite:** Number of individuals served by Community Action who experienced reduced utility costs, established utility service and/or avoided utility disconnection.

FNPI 4g. Remains as written if there is a purpose to separating out water safety from FNPI 4e.

FNPI 4h. **Added if there is a purpose to separately reporting water and wastewater outcomes:** Number of individuals served by Community Action who experienced reduced water/wastewater costs, established water/wastewater service and/or avoided water/wastewater service disconnection.

FNPI 5: Health and Nutrition Indicators

DNSC has long advocated for the recognition that evidence based best practices in the health and nutrition domain should allow participation and receipt of services to be used as proxy indicators of improved outcomes. DNSC stopped reporting outcomes in this domain because state monitors insisted that individual participants have survey, pre- and post-service evaluations or other documentation of outcomes that were too burdensome to collect. If it is clearly communicated that for evidence-based services do not need to be documented in this way, the FNPI's could be written in a way that makes the relationship between participation and outcomes clear. Instruction and training should also include clear direction to state monitors that when an evidence-based best practice service is in use, agencies should not be required to further document improved outcomes. Other rewritten wording is suggested to increase clarity and

allow reporting of all types of care, not just preventive. DNSC respectfully requests that the FNPI's for this domain be as follows:

FNPI 5a. **Rewrite:** Number of individuals served by Community Action who improve health by receiving immunizations, blood pressure checks, bone density screenings, cancer screenings, prenatal and reproductive health care, and other preventive health care. (For this FNPI, all participants who receive the service are assumed to achieve the outcome without further documentation.)

FNPI 5b. **Add:** Number of individuals served by Community Action who improve health by achieving and/or maintaining access to a primary health care provider.

FNPI 5~~b~~c. **Rewrite:** Number of individuals served by Community Action who are enrolled in and/or sustain enrollment in health care coverage during the reporting period. (Access to health care coverage is not an outcome unless the individual is actually enrolled.)

FNPI 5~~c~~d. Is there a reason that this is reported separately from other health care service outcomes?

FNPI 5~~d~~e. **Rewrite:** Number of individuals who improved wellness through participation in wellness services such as exercise, meditation, stress reduction, healthy aging, nutrition education and similar wellness classes and activities. (For this FNPI, all participants are assumed to achieve the outcome without further documentation.)

FNPI 5~~e~~f. **Rewrite to remove (age 65+) due to differing age eligibility among senior service programs:** The number of older adults who improve their independence by receiving home visiting services. (For this FNPI, receiving the service is an evidence-based gateway to the desired outcome. All participants are assumed to achieve the outcome without further documentation.)

FNPI 5~~f~~g. **Rewrite:** Number of individuals served by Community Action who achieve and/or maintain access to and participation in supportive mental, behavioral and substance abuse health counseling and/or therapeutic services.

FNPI 5~~g~~h. **Rewrite:** Number of adults who achieve and/or maintain access to and participation in oral health services.

FNPI 5~~h~~i. **Rewrite:** Number of children who achieve and/or maintain access to and participation in oral health services.

FNPI 5~~i~~j. **Rewrite:** Number of individuals served by Community Action who have improved food security through access to healthy food. (For this FNPI receipt of the service is the evidence-based outcome. All recipients are assumed to achieve the outcome without further need for documentation.)

FNPI 6: Civic Engagement and Community Involvement Indicators

DNSC does not have comments in this area.

FNPI 7: Services Supporting Multiple Domains Indicators

DNSC fully supports the removal of this FNPI as it was confusing and often resulted in reporting that duplicated counts already being reported in other individual domains. That being said, OCS must acknowledge that some services do, in fact, support multiple outcomes in multiple domains instead of trying to artificially link services to single outcomes.

Section ~~B~~ C: All Characteristics Report

Please see earlier comments under the question of whether data collection creates a significant burden for details regarding the challenges of trying to complete a single report of unduplicated demographics from disparate sources of data.
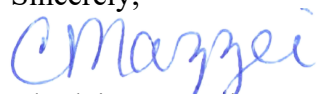
Subsection E in the current reporting appears to have been removed. While DNSC supports the removal of this section as confusing and duplicative, it did provide the opportunity to count program participants who were not otherwise included in the All Characteristics report. How will OCS provide the opportunity for that to occur?

Module 4, Community Level

Module 4, as currently structured, does not provide agencies with a meaningful or easily completed format for reporting the community-level work in which we all participate. The module expects intensive reporting on a single project, when the work that most of us do is ongoing participation in multiple community-level collaboratives that may not have discreet outcomes. Many of us who do community-level work choose not to report it because of the complexity and restrictions of Module 4. DNSC encourages OCS to work with the Community Action network to better understand how we approach community-level work and the format that can best be used to allow us to tell our diverse stories.

DNSC would again like to express appreciation for the opportunity to comment on the proposed CSBG Annual Report. Further engagement with CSBG Eligible Entities would achieve even better results than the truncated comment period currently allowed. We look forward to participating in such efforts.

Sincerely,

Charlaine Mazzei, MSW
Executive Director

CC: California Department of Community Services & Development
       California Community Action Partnership Association