



**KCEOC Community Action Partnership**  
**PO Box 490, Barbourville, KY 40906**

June 18, 2024

Dear Office of Community Services (OCS),

I am writing on behalf of KCEOC Community Action Partnership in regard to the proposed changes to the Community Services Block Grant annual reporting. We appreciate the Office of Community Services (OCS) allowing the agency to submit comments regarding items that will affect our agency's ability to show the differences we are making in the lives we serve.

Below are our areas of concern; please note there are several other areas we also share with our colleagues that may not be listed here. The items below are most pressing for our agency.

- **Costs:** Changes in the reporting system will not only increase costs to the agency, but will also take away precious time needed to be working with our families in need.
- **Numbering Changes of Modules:** As difficult as it was to learn the different module numbers of the reports, changing those numbers now will be very confusing to staff and will once again create a learning curve that will take up even more time to re-learn.
- **Outputs v/s Outcomes:** As a ROMA trainer for the last 12 years, I have been taught and am dedicated to showing the outcomes and changes we make in the lives of those we are serving. Seeing the language changed to capture services or "outputs" is very disappointing. Even with other funders we work with, such as the Department of Housing and Urban Development (HUD), they focus on outcomes. For instance, they do not focus on how many homeless individuals we enroll (output) in our program. They want to know how many were permanently housed (outcome), how many become employed (outcome), how many increased their income (outcome). By changing the criteria, we think OCS may be weakening the purpose of CSBG instead of being progressive with how Community Action should be looking at client success.
- **Demographics:** It is critical that Single Parent Females and Single Parent Males be left in as part of the All Characteristics Report. Last year alone, these populations made up almost 20% of the household types served by KCEOC. In addition, the



single parents (both male and female) make up almost 100% of the household composition of individuals with children served by the agency's homeless shelter and youth homeless crisis center. In fact, between 83% and 90% of all homeless families are headed by single mothers.

Income sources are yet another item that is critical to collect on those being served. Not only does it provide data for prospective grants (as does household type), but it also provides a way to show a breakdown of who is being served (e.g., disabled households, veterans, working families). Showing different income sources in the system can also assist the case manager's work with clients by helping them achieve their financial goals; understanding the different income sources is crucial for effective financial planning and budgeting, which can lead to self-sufficiency.

- Module 3a

Employment- Please do not remove unemployed adults who obtained employment as a FNPI; this is critical to show as an outcome. KCEOC does not want to be viewed as a "hand out" organization and we have worked for almost 60 years to show that our purpose is to bring people out of poverty through employment, housing, early childhood education, and many other vital programs. Obtaining employment should also include more services to explain how employment was obtained, such as job readiness training, resume development, and interview skills training.

Income and Asset Building Services- Please move SRV 3d the number of individuals receiving transportation services supporting income and asset building to Domain 7 transportation. Also, 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. In our experience, there are always services to back up meeting a NPI. Also, for 3a, please take out that clients are completing training; this is an output. Again, we need to focus on outcomes and what change took place in the lives of the client. Going to a training is great, but what was accomplished as a result? Did the individual get a job? What is the ultimate outcome that is trying to be reached?

Housing- SRV 4g the number of households receiving Weatherization services does not align with FNPI 4f number of individuals served with energy assistance and/or energy efficiency homes. It is not clear here if this is still a Weatherization service or if the agency is to count LIHEAP too. For FNPI 4g, is this referencing LIWAP? Is it anticipated that LIWAP is returning? Plus, individuals "served" is also an output, not an outcome.

Multiple Domains- Please do not remove case management, referrals, and eligibility determinations. All of these are critical to our homeless and other services. We are serving hundreds of client in extensive case management services and we need to keep up with who is in case management and what services they are receiving. We



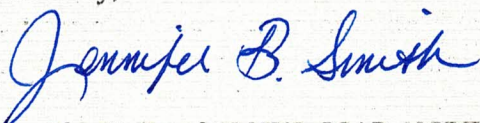
are very serious about helping people move up the ladder from in crisis to stable to secure to even further.

Education- Please take out the words "enroll" and "connected" in 2a, 2b, and 2e; these turn outcomes in to outputs and does not give a true picture of accomplishments/differences made in the lives in those we are serving.

Health- 5b, 5c, 5d, 5e, 5g, 5h, 5i are all outputs; this is revealing through the words "access" and "receiving." There are no actual outcomes and these are NPIs. NPIs should always be outcome focused. Also, 5f has been removed, which leaves the agency no way to report outcomes for our senior services, including our Service Coordinator program we have had since 2005. It provides services that allow seniors to age in place and avoid being institutionalized.

Thank you for allowing us to convey KCEOC Community Action Partnership's thoughts and concerns regarding the new reporting criteria. We sincerely appreciate your consideration of the changes we have proposed and hope you understand our trepidations. Please know, our comments are meant to be able to report a true picture of what we are accomplishing at the local level. We think this can be done best through the conveyance of outcome driven service provision and reporting. If you need anything further, please do not hesitate to contact me at 606-546-3152, extension 0300 or by email at [jsmith@kceoc.com](mailto:jsmith@kceoc.com).

Sincerely,



Jennifer B. Smith, MSW, CCAP, NCRT  
Vice President/Chief Operating Officer  
CSBG Director