To: Administration for Children and Families (ACF) via email: infocollection@acf.hhs.gov

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

Please find comments on the above-referenced activity on behalf of Community Action Partnership NJ (CAP NJ), the Statewide Association with a mission to function as an advocate, provide training and technical assistance and help reduce poverty by building a more robust network of agencies, programs, and outcomes in New Jersey. CAP NJ appreciates the opportunity to respond to the changes associated with the Community Services Block Grant (CSBG) Annual Report, the Office of Community Services (OCS), and the potential to reduce the burden of completing this document while improving the overall usefulness of the information obtained from the Annual Report.

Regarding the *Reorganization of the Report:*

- Regarding reorganizing the report, changing Module 3 (Community Level Change) to Module 4 seems unnecessary. The current Module 3 is a multi-year reporting measurement and changing the number from 3 to 4 appears superfluous. It may also yield confusion in the data collection and reporting in future years. This change may also impact the quality and clarity of information, and it seems unnecessary when Module 3 can remain. This change would require many revisions to training material in other areas. Training material referencing Module 3 bleeds into different areas, including data systems, organizational standards, and community need assessment training. If this reorganization occurs of the modules, additional costs and a time burden will be related to this exchange of names and functions and add unnecessary confusion.

Regarding the *Reporting Burden:*

- The need to phase in reporting requirements with this change is critical as many agencies do not currently report on a federal fiscal year. Changing all reporting to align with the federal fiscal year will eventually provide more helpful information, with the understanding that sufficient time to incorporate this information will occur over multiple years.
- Data provided in the reporting burden analysis also identifies the need for systematic reporting; requiring software can also yield reduced reporting burden and opportunities for multiple federal reporting systems to be able to share data outcomes, which continue to be a goal of providing accurate reporting information. For example, demonstration projects for data collection with Head Start, LIHEAP, and USDA should be encouraged to optimize reporting accuracy and reduce the reporting burden. The CAA network is committed to capturing our

work's full scope and impact by adding tools and technology and streamlining reporting, which is a worthwhile use of time.

Regarding the *OMB PRA Clearance Process:*

- An opportunity to learn about the changes and respond is helpful; it would be beneficial to intentionally engage the network as we continue to collaborate, share ideas and perspectives, leverage our viewpoints, and incorporate philosophies that yield a strong partnership. Working together with the network and those responsible for compiling the reporting can lead to a better understanding of the barriers to accurate reporting information and improve the overall product. Also, please consider consistent and ongoing training for accurate reporting on the final product and understanding the significant staff turnovers and changes that occur at federal, state, and local levels, including federal legislators.

Regarding the *Removal of CSBG Domain: Services Supporting Multiple Domains*

- The nature of CSBG and its value is found in the multiple domains section, and eliminating this section reduces the quality and clarity of the information connected. Removing this option also reduces the ability to demonstrate the needs of low-income persons and the services and opportunities that can help them thrive. The information in this section also allows agencies to identify screening tools and services best suited to the population they serve, identify other gaps in services in their local communities, and help demonstrate the community's emerging needs. CSBG reporting, by nature, is designed to allow agencies to illustrate how service delivery is leveraged through holistic approaches to service delivery, and removing this option will significantly reduce the ability to incorporate integrated service reporting, which is the very model of CSBG funding. The current reporting with multiple domains allows experienced data analysts to review patterns and identify links that may support information relating to causation. In New Jersey, we devote specific time to train agency staff on multiple domains because it is an effective manner to identify the uniqueness of CSBG funding by nature of the flexibility and the vast resources of the CAA network and to assess the data to build additional supports and services based on the needs of low-income individuals and families. Research and evidence also support increased trust when an agency can help individuals across domains.

Regarding the <u>*Service to Outcome Plan:*</u>

- The proposed Service to Outcome Plan requires additional information before implementation. If reporting to an outcome is required when reporting a service, CAAs may not be able to include information critical to demonstrate the agency's results. The Service to Outcome Plan for the new Transportation Domain seems to be an activity; transportation, even mobility, is a critical factor in allowing poor individuals to access resources to end poverty. Sometimes, job opportunities, education, and even Head Start services are only available in certain areas. So, it makes sense that CAAs are providing transportation. Including transportation in the service-to-outcome plan does not make sense, as transportation alone does not lead to one of the three national goals. If transportation is considered a "concrete support," what does that say about

case management not being included? Or some of the other services that are critical to service delivery. Further, differentiating pre-employment support, such as "concrete support," seems unnecessarily detailed and will require splitting outcomes into employment domains.

Regarding *SRV's and NPI's*:

The SRVs and NPIs need updating. I hoped that when they were updated, the opportunity to tie these to the three National Goals would exist, providing a tangible link between services, activities, outcomes, and the network's mission. Some general comments along with the global comment that concrete support is not feasible to ensure accurate reporting:

- SRV 1d includes employment retention, but the FNPI 1c only applies to increased income.
- FNPI 2e: Would like to see (e.g., associate, bachelor, *vocational)*
- For consistency purposes (global), when identifying services for youth and a separate duplicate service for adults, it would be more beneficial to list the youth SRV consistently and then the adult SRV (Ex, SRV 2k and SRV 2q) rather than sometimes having them grouped together and sometimes not. Also, many of the FNPIs are not outcome-based. For example, FNPI 2b: The number of youth actively connected to education and skills development programs.
- For privacy issues on data collection that could lead to additional information to improve data accuracy, combining SRV 5e and 5F to "the number of individuals with access to health coverage and health options" could increase data quality.
- FNPI 5g: The number of adults receiving preventative **and** oral health services (not all referrals may be for preventative), adding for all referrals to be included in data collection.
- Gray boxes are confusing; I hope OCS provides an additional public comment period before the final version is adopted.
- Several SRVs in Category 5 require additional FNPIs, for example, domestic violence, mental health services, and substance use *disorder* (please use language as per SAMSHA guidelines). Data must be collected when possible as research indicates poor and minority women are disproportionately affected and experience other adverse outcomes (NIH).
- There is still an opportunity to identify food/hunger separate from nutritional outcomes.
- SRV 6a: Voter Education and Access services- language that includes other civic engagement, volunteerism, participating in elected or public meetings, speaking, assembling, etc., could increase data collection accuracy while maintaining the privacy of individuals who may not want to disclose their voting habits, voting registration efforts, or
- It is essential to understand the process of submitting the Annual Report and the review by OCS, and steps that can reduce the time for accurate data are welcome.
- The use of "Z" is still confusing. While I understand the need to create some flexibility, I also know that having a streamlined, systematic approach to data collection by more than 1,000 agencies is more important, focusing on reducing poverty, revitalizing communities, and empowering individuals and families.

Very Truly Yours,

Dr. Georjean W. Trinkle CAP NJ