



June 21, 2024

## Proposed Pennsylvania Public Comments for CSBG Annual Report 3.0

Thank you for this opportunity to provide comments on the proposed revisions to the CSBG Annual Report. These comments were compiled and are submitted by the network of Community Action Agencies in Pennsylvania, the Community Action Association of PA (state association) and PA Department of Community and Economic Development (state office). They are based on feedback gathered through two public comment sessions held with a combined total of 52 participants from Agencies in our commonwealth.

While we applaud the Office of Community Service's efforts to reduce burden in Community Services Block Grant (CSBG) reporting and are pleased with some of the changes, we have concerns regarding the overall effectiveness of the revised report to tell the story of the comprehensive work that Community Action Agencies do. Community Action's primary purpose is in helping families improve their economic stability and engaging communities in making lasting change. By removing National Performance Indicators (NPIs) that focus on two-generational outcomes, time referenced outcomes and those that demonstrate a family's progress towards economic self-sufficiency, focus is placed back on the counting of basic, temporary outputs rather than comprehensive outcomes. This change reduces the narrative that differentiates Community Action from other social service providers.

The following specific feedback is being offered.

### Module 1

**Section G** – We are very supportive of the change in Section G to reference all Performance Management systems that meet the requirements of Section 678E(b) of the CSBG Act rather than limiting this to only the ROMA system. Pennsylvania's state office has responded to local Agency feedback in recognizing that different situations require different approaches to performance management and continuous improvement, and the state association has developed modernized performance management training to meet the changing needs of our Agencies. This change makes it clearer that accepting the use of other performance management systems is allowable under OCS regulations. We do question if G.4. was intended to still reference ROMA specifically or if it should reference overall performance management.

**Federal fiscal year switch** – We understand the decision to switch to a federal fiscal year for all reporting. However, we want to note that this switch will increase the burden for Pennsylvania's Agencies in the first couple years of implementation. PA currently contracts and reports on a calendar year; therefore, all data collection systems will need to change to the new reporting period.



Additionally, a calendar year is a reporting timeline that makes sense for reporting outcomes to the community and that is a critical part of our reporting work. Having community engagement is critical to community action and reporting our outcomes is part of that engagement strategy, it should be in a manner that makes sense to the community.

## Module 2

**Domain name changes** – The change of the Education and Cognitive Development domain to Education and Youth Development feels misleading since the adult education NPIs are in this section. Additionally, we do not agree with the removal of the Services Supporting Multiple Domains section. To reduce barriers to economic sufficiency, services such as intensive case management are essential. Having a domain to capture this is important.

## Module 3

The reordering of modules will create an increased burden for Agencies and state offices as all data collection systems will need to be updated to this new numbering scheme. If Agencies need to do this work themselves, it will result in a time burden. If client tracking software vendors choose to do the work, it will result in a cost burden. Either way there will be a time and cost associated with training staff.

While we recognize that the removing and adding of services and NPIs will adjust numbering no matter which module they are in, switching from module 4 to module 3 will increase the changes significantly.

### Module 3a – Income and Asset Building Services

**Former SRV 3o** – VITA services are a proven method for moving families out of poverty. Removing this service will eliminate a data point that demonstrates one service that CAAs use that is more than a “band-aid” service. We recommend restoring it.

### Module 3a – Housing Services

**New SRV 4d** – Utility services are provided for purposes other than eviction prevention. We recommend restoring the sub-category of *Utility Payment Assistance* and moving this service back under this section.

**New SRV 4f and 4g** – As Weatherization now has funding streams that pay for health and safety and readiness activities, it is important to provide instructions as to if those services will be reported with the other maintenance services in 4f or with the Weatherization services in 4g.

### Module 3a – Services Supporting Multiple Domains/ Transportation

**Former 7a-c** – In helping families to reach longer term goals rather than stopping when initial needs are met, intensive case management (resource navigation, coaching, etc) is essential. Former SRV 7a provided Agencies a place to show how often this was occurring; while former SRV 7b and 7c demonstrated the linkages that came from some of those case management appointments.

**Current Module regarding Transportation** – If former SRV 7d is split into the proposed SRV 7a-e, key services missed, which also serve to provide longer term supports to transportation challenges are: auto repair, purchase, ownership, etc. The proposed services only focus on temporary assistance services as opposed to services that would provide a net asset to families.



## Module 3b

Within the provided NPIs in Module 3b, we have overall concerns regarding the removal of the NPIs that show time measurements, which measure longer-term stability and outcomes, as opposed to solely focusing on immediate service counts ("band-aids"). Such changes risk obscuring the true impact of the CSBG program and may hinder efforts to assess its effectiveness in addressing poverty and promoting self-sufficiency.

While it was noted on the calls with OCS that there was a concern regarding the burden of follow-up when requesting reporting on these measures, many Agencies already collect this data for other funding such as WIOA, Early Head Start, Head Start, and HUD Housing Counseling; therefore, aligning with the types of data and timeframes that those programs use would allow the impactful work of the Agencies to be told without creating additional burden.

We understand that the data reported in the "Other" NPIs (Z outcomes) was not collated and used. However, we recognize that this is where some of the most innovative work that CAAs were doing was being reported. We would recommend a data work group discussion with OCS, state offices, state associations, and CAAs to discuss a workable alternative so that valuable data is not lost.

### Module 3b – Employment

While measuring skills gained leading to employment is important (NPIs 1a-1b), it only takes participants half-way to the end goal. We would encourage the Department to add an NPI back in that would measure employment obtained as this is the result that will lead to actual economic gains.

### Module 3b – Education and Youth Development

**New NPIs 2a, 2b and 2e** – Simply measuring "enrollment" or "connection" does not actually measure an outcome of a skill gain or change. We encourage changing the wording of these NPIs back to outcomes wording rather than output wording.

**New NPI 2b** – While it is implied that this NPI is for youth aged 5 and older, the age range is not clear.

**Former NPI 2e** – Combined with former NPIs 5d and 5e, 2e was one of the measures where the results of multi-generational programming could be reported. If these three NPIs are eliminated, it is important to provide an NPI to replace them where whole family outcomes can be captured.

**Former NPI 2f** – Many individuals enrolling in adult education classes will have many years before they are ready to begin taking GED-preparation level classes. Former NPI 2f captured the progress of these individuals and could have been standardized if it had been tied to rising in assessment level with which ever assessment (such as TABE) a program was using.

### Module 3b – Income and Asset Building

**New NPI 3a** – This NPI is worded as an output rather than an outcome.

**Measuring Economic progress** – Goal 1 of CSBG Theory of Change is "Individuals and families with low incomes are stable and achieve economic stability." The Income and Asset Building section should contain at least one NPI that measures achievement of this goal.



## Module 3b – Housing

**New NPI 4f** – This NPI is unclear. It is worded as an output. Splitting it into two separate NPIs – one focused on increasing energy efficiency of homes and the other focused on avoiding or restoring utility access – would allow this to be worded as an outcome again.

## Module 3b – Health and Nutrition

**New NPIs 5c, 5d, 5e, 5g, 5h, and 5i** – The NPIs all are measuring receipt of service and not an outcome of that service. We encourage rewording these back to outcomes wording, as otherwise, they only should be in new Module 3b – Services.

**Former NPI 5f** – Rather than change this NPI to 5e which only measures home visiting services, we encourage leaving the original wording so that other means of maintaining independent living can be captured (home delivered meals, home modifications, etc.). We also recommend changing the age range captured in this NPI to ages 60+ to align with the Older Americans Act. This will reduce burden for those Agencies who dually serve as their community's Area Agency on Aging as the same age range will be used for multiple funders.

## Module 4

Communities should be at the heart of all Community Action Agencies. It is literally in our names. By once again leaving this Community Level initiatives module optional and largely untouched, it is sending the message that this larger transformative work is less valued or less important.

The real impact of CAA comes from community involvement: sitting and being heard at the decision tables, being recognized as community/county/state leaders, being recognized as problem solvers, being capable of leveraging resources and finding solutions, demonstrating high integrity and transparency, being individual/ family/ business/ community mentors, and developing and growing networks/ collaborations/ partnerships!

The current method for reporting community initiatives is clunky. Community initiatives are messy. Rarely do they follow one linear path and end with the same outcomes that they started with. Ideally, this section would provide a way for Agencies to report an initial overarching goal and then to provide yearly updates as to the developments that have happened and the impacts that have been made.

We encourage the department to reconsider leaving this section as optional, as well as to modify the measurements in this section to better capture the impacts being made. Tying reporting and impact to local community needs assessments, the demonstrated position of the community action agency as a trusted pillar in their communities, and the innovative ways CAAs are working to make long-term sustainable change in their communities are all ways to better capture community level outcomes.

## Overall

**Clarification and guidance documentation** – One of the biggest challenges from Annual Report version 2.0 is a lack of guidance documentation for the collection and reporting of data. This has resulted in an inconsistency in how data is reported from Agency to Agency and state to state. Pennsylvania's CAAs have emphasized the importance of standardized guidance and improved documentation of community-level initiatives. It is imperative to develop a better framework for reporting outcomes and demonstrating the impact of CSBG-



funded initiatives on the ground. This includes establishing clearer guidelines for data collection and analysis, as well as enhancing efforts to showcase the transformative impact of the program on individuals and communities.

### **Service to Outcome Plans**

*Education* – SRV 2l-2n do not necessarily result in certificates or credentials. Rather they result in a skills gain (formerly captured under former NPI 2f).

In light of these concerns, we urge policymakers and relevant stakeholders to reconsider the proposed changes to the CSBG Annual Plan 3.0. It is essential to ensure that any modifications to the program are guided by a commitment to transparency, accountability, and the overarching goal of alleviating poverty and promoting economic self-sufficiency. It is our hope that the Department will reconsider the removal of NPIs and services that focus on the comprehensive, economic-stability-achieving work that CAAs are doing. This is the work that separates us from other social service providers. If the goal is to reduce the number of data points being collected, we would encourage the elimination or merger of the data points that focus on the temporary, “band aid” supports.

The story of Community Action that Pennsylvania's community action network would like to see told is one of a community of change agents who are focused on the long-term growth of the individuals, families and communities with whom they work. Our goal is to create a world where we no longer see multiple generations of the same family returning to receive our services, but rather one where future generations are returning to volunteer to help others because their family's cycle of generational poverty was broken. This is the story the CSBG Annual Report data should be capturing and telling.

Thank you for considering our concerns and for your commitment to strengthening the CSBG program for the benefit of all those it serves.

Sincerely,



Beck S. Moore  
Chief Executive Officer  
Community Action Association of Pennsylvania

On behalf of:

Jim Wansacz	Agency for Community EmPOWERment of NEPA
John Litz	Allegheny County Department of Human Services
Marlene Petro	Armstrong County Community Action Partnership
Lawrence Berringer	Berks Community Action Program, Inc.
Jeffrey Fondelier	Blueprints
Erin Lukoss	Bucks County Opportunity Council, Inc.
Kimberley Miller	Carbon County Action Committee for Human Services
Wendy Melius	Center for Community Action



Michelle Stiner	Central Pennsylvania Community Action, Inc.
Megan Bair	Central Susquehanna Opportunities, Inc.
Dolores Colligan	Chester County Department of Community Development
Jennifer Warabak	Commission on Economic Opportunity
Dawn Godshall	Community Action Committee of the Lehigh Valley, Inc.
Josh Yoder	Community Action Partnership of Cambria County
Vanessa Philbert	Community Action Partnership of Lancaster County
Christine Hartman	Community Action Partnership of Lebanon County
Wilma Torres	Community Action Partnership of Mercer County, Inc.
Robert Cardamone	Community Action, Inc.
Sandra Curry	Community Partnership, Inc.
Robin Rohrbaugh	Community Progress Council, Inc.
Kim Hawk	Fayette County Community Action Agency, Inc.
Danny Jones	Greater Erie Community Action Committee
Brandi Fleming	Indiana County Community Action Program, Inc.
Tom Scott	Lawrence County Community Action Partnership
James Plankenhorn	Lycoming-Clinton County Commission for Community Action, Inc. (STEP, Inc.)
Jennifer Strauch	Monroe County Fiscal Affairs Office
Rick Beaton	Montgomery County Community Action Development Commission
David Greene	Northern Tier Community Action Corporation
Orlando Rendon	Office of Community Empowerment & Opportunity
Brenda Lee Soto Colon	PathStone Corporation
Pamela Wilbon	Pittsburgh Community Services Inc.
Dave Young	Schuylkill Community Action
Megan Shreve	South Central Community Action Programs, Inc.
Anne Garrison	Tableland Services, Inc.
Marlene Landrum	The Community Development Program of Beaver County
Dennis Phelps	Trehab Community Action Agency
Jennifer Wintermyer	Tri County Community Action
Sue Auman	Union-Snyder Community Action Agency
Amie Wood-Wessell	Venango County Human Services
Tressa Sweeney	Warren-Forest Counties Economic Opportunity Council
Mandy Welty Zalich	Westmoreland Community Action

