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DEPARTMENT FOR COMMUNITY BASED SERVICES**

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Good afternoon,

Thank you for providing us with the chance to submit our feedback concerning the proposed modifications to the CSBG Annual Report.

Enclosed, you will find detailed comments from our team at Kentucky State Office. We have carefully reviewed the proposed changes to the CSBG Annual Report and have compiled our thoughts and suggestions for your consideration.

1. The Kentucky State Office will not be changing the contract year from State to Federal Fiscal year. Furthermore, Kentucky is a reimbursement state, and the invoices would still be on the state fiscal year. Consequently, this will not reflect correctly with the eligible entities totals for Module 2.
2. Since the contracts in Kentucky will be on a state fiscal year the monitoring for the agencies will reflect this.
3. Kentucky does not use or have discretionary funding for T & TA we allocate 95 percent of the funding to our entities and have a contract with our State Association to perform T & TA with the State office.
4. Kentucky would like to propose continue use the CSBG Annual Report 2.1. If not, there will need to be funding to help states offset the expense of updating software systems and T/TA. The cost associated with updating the software systems could be significantly high and present a major burden on our agencies.
5. Kentucky believes this change will dismantle the quality and clarity of ROMA and/or PEAAC.
6. The proposed numbering format of the Modules will lead to confusion for CSBG eligible entities. Kentucky proposes 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).



7. The extreme impact on the State, the State Association, and the eligible entities 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.
8. 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.
9. Kentucky proposes leaving the following in the All-Characteristics Report: Single Parent Female and Single Parent Male. This is a program that is greatly supported by the state office and there are programs that would be impacted applying for certain grants (e.g., Fatherhood Initiatives, etc.). This could cause an extreme burden for agencies applying for grants. Also, in the All-Characteristics Report: Income Sources allows agencies to know who they are serving and helps to breakdown myths of who is served. Which is reported to our legislators.
10. It has been brought to our attention that the new OCS Dashboard (website) that will roll out in the future. It may not reflect correct information, if we are only lumping services together and not showing outcomes, how will the information be available to the public, legislators, other funding sources? We believe this could weaken the exceptional work that a CSBG eligible entity do for their communities.

Below are areas on the report Kentucky consider important and are still needed to reflect the outcomes and performances from the entities.

#### (Module 3a)

##### Employment

1. The number of unemployed adults who obtained employment has been removed as a FNPI. **This is a very important indicator for CSBG eligible entities, and it is part of the CSBG Act.**

As referenced above, obtain 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. No comments or suggestions.

##### 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.). **Should this be moved to Domain 7 Transportation?**

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2. There are no services to match the new NPI 3b – The number of individuals who opened a savings account (Suggest adding a SRV – Individuals who opened a savings accounts/IDAs and other asset building accounts) or IDA or NPI 3c – The number of individuals who purchased a home (Suggest adding a SRV – Individuals that received Homebuyer Counseling and other homebuying support services). You may assume that these services are covered under the new SRV 3b but again, an agency will encounter difficulties in accurately demonstrating the progress they have made in assisting individuals towards economic security.

### 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.
2. Is the assumption that FNPI 4 - The number of individuals served with improved water safety in their homes - would be reached if someone had water safety which is included in SRV 4f – The number of individuals receiving housing maintenance and improvement services (e.g., structural, accessibility improvements, emergency home repairs, water safety, healthy home)?

### Health

#### Civic Engagement and Community Involvement

1. Why was Leadership Training 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.). Should this move to Domain 7 Transportation?

#### Multiple Domains

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

#### FNPIs (Module 3b)

#### Employment

1. The number of unemployed adults who obtained employment has been removed. This is part of the CSBG Act and is a very important indicator for CSBG eligible entities.

#### Education

1. 2a – The number of young children (0-5) enrolled in childcare or early childhood education services. Enrolling in a service is an output not an outcome.
2. 2b – The number of youths actively connected to education and skills development program. Actively connected is a service, not the outcome.

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3. 2e – The number of individuals who **enrolled** in post-secondary degree program (e.g., associates, bachelors, etc.) **Enrolling does not mean achieving; this is a service.**

#### **Income and Asset Building**

1. 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. Many of the outcomes are outputs (services), not outcomes, however they are output services.
  - FNPI 4f – why was ‘served with energy assistance’ added? Is this still a Weatherization outcome or do you now count LIHEAP assistance here?
  - FNPI 4g – individuals served with improved water safety in their homes – is the LIHWAP?

#### **Health**

2. Many of the outcomes in Domain 5 are outputs (services), not outcomes they are output services.
  - FNPI 5b – The number of individuals with access to health coverage.
  - FNPI 5c – The number of individuals receiving reproductive services.
  - FNPI 5d – The number of individuals receiving wellness services.
  - FNPI 5e – The number of older adults (age 65+) receiving home visiting services.
  - FNPI 5g – The number of adults receiving preventative oral health services.
  - FNPI 5h – The number of children receiving preventative oral health services.
3. 5f should not be removed (The number of seniors (65+) who maintained an independent
4. living situation)? **Supporting senior independent living is a large part of what our entities serve, this is an important FNPI.**

#### **All Characteristics Report (Module 3c)**

##### **D. Household Level Characteristics**

1. Single Parent Female and Single Parent Male. This is beneficial to agencies when applying for certain grants (e.g., Fatherhood Initiatives, etc.).
2. Income Sources allows agencies to know who they are serving.

We sincerely appreciate your time and the thoughtful consideration you are giving these critical matters. Your dedication to understanding and addressing these issues is greatly valued by Kentucky.

Respectfully,



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