

November 7, 2024

Dr. Lanique Howard, Director Office of Community Services
Administration for Children and Families
U.S. Department of Health & Human Services
330 C Street SW Washington, DC 20201

Re: CSBG Annual Report 3.0 Revisions: Proposed Information Collection Activity;
Community Services Block Grant (CSBG) Annual Progress Report (Office of Management
and Budget No. 0970-0492)

Dear Dr. Howard and OCS Colleagues,

Central Missouri Community Action (CMCA) appreciates the opportunity to provide comment on the proposed changes to data collection for Community Services Block Grant (CSBG) Annual Report 3.0. CMCA is one of nineteen Community Action Agencies (CAA) serving Missouri. We are guided by the national Promise of Community Action and our own agency mission: *building relationships to empower people, strengthen resilience, and improve the quality of life for all members of the community*. CMCA served 15,790 individuals in 7,199 households last fiscal year. While serving these individuals we in turn are improving economic stability in the eight counties we serve. CMCA's Theory of change demonstrates our desire to see thriving communities in moving families from poverty to resilience by wrapping economic stability, family well-being and social connection programs and coaching models around those we serve.

CMCA understands the proposed revisions to OMB Annual Report from the Office of Community Services were designed to streamline state administrative information collection and National Performance Indicators while also reducing burden on State offices and designated CAA's. We recognize and appreciate OCS's intent to clarify and reduce required data collection and also have significant concerns that the proposed changes will *not* in fact reduce the administrative burden as intended.

The following highlight and summarize priority comments, concerns and recommendations based on how OCS Annual Report 3.0 proposed changes will directly impact CMCA and many others in the Community Action network:

- The proposed changes outlined in the CSBG Annual Report 3.0 overall do not reflect understanding of the breadth and depth of blended services provided to our families

and minimizes the importance of *community* level initiatives by CMCA and Community Action agencies around the nation.

- CSBG National Program Goals are clearly identified in the CSBG Act to 1) reduce poverty, 2) empower low-income families and individuals to become self-sufficient, and 3) revitalize low-income communities (42 U.S.C. § 9901(1)). Performance measures 12A and 12B outline both *individual* developmental outcomes as well as *community*-wide transformation initiatives to address the causes and conditions of poverty. The proposed change to CSBG Annual Report 3.0, with the current Module 4 (Individual and Family Level) becoming Module 3, and the current Module 3 (Community Level Transformation) becoming Module 4 creates concern across the network. ***Community level transformation is not a suggestion, but rather a defining factor of the Community Action movement.*** Relocation of the Community Level Transformation module to Module 4 may seem like a minor change, however it further devalues the dire importance of the innovative initiatives operating and serving our communities. If we are not reporting our community level outcomes, OCS will not have the required data to report to the Government Accountability Office (GAO) regarding Performance Measure 12B.
 - CMCA recommends OCS keep the order of Module 1, 2, 3 and 4 as they are currently written in CSBG Annual Report. Furthermore, we urge OCS to consider ***requiring*** Community Level Transformation (current Annual Report 2.1 Module 3).
- OCS is proposing a decrease in FNPIs reported in CSBG Annual Report 3.0. Unintentionally OCS is thereby limiting CAA reportable outcomes, requiring financial resources and staff time for training, as well as necessary data system updates. This change runs the risk of weakening the connections between our unique set of services, outputs and outcomes, most notably in our **Whole Family Approach model**, *requiring* a bundled services approach to move families toward self-reliance. We understand that agency choice remains to collect additional data at the local level in the proposed Annual Report 3.0. CMCA respectfully requests OCS engage the Community Action Network and experts in the field to discuss any changes in services or outcomes (FNPIs) prior to finalizing Annual Report 3.0 revisions. This ensures you are offering agencies the ability to present a picture of our overall performance.

CSBG Annual Report 3.0 Module 4 Section B recommendations regarding Services (SRV):

- CMCA recommends keeping all SRV in **CSBG Annual Report 2.0 1a-1q (Employment Services)** as written. While we support the consolidation of reportable services in the CSBG Annual Report 3.0, the *Employment* domain services SRV 1a-q are absolutely *vital*

to telling the story of our families overall economic mobility journey. The proposed revision of services is limited to outputs and appears to devalue the coaching model we have worked tirelessly to implement at CMCA.

- Education and Youth Development Services verbiage- Head Start Performance Standards released in late summer 2024 has clarified the appropriate name for the comprehensive preschool education program ages 0-5 is Head Start, removing the word "Early."
- CMCA recommends keeping CSBG Annual Report 2.0 **SRV 2cc** with wording revision to *SRV 2cc Home Visits (Home Visits)* to *"The number of families participating in evidence-informed home visiting services."* CMCA operates robust home visiting programs, within our Early Head Start, Homebased Early Head Start, Head Start and BRIDGE programs at CMCA Nearly 60 years operating the two-generation approach has led us to forming our current Whole Family Approach model, which requires a home visit component for some elements of our model.
- OCS has severely limited our Income and Asset Building services and lessened impact by combining many of them together, which does not tell the same story as reporting family services and analyzing the specific set of individualized bundled services utilized toward success. CMCA recommends keeping **CSBG Annual Report 2.0 SRV 3a, 3b, 3c, 3e, 3f, 3m, 3n and 3o (Income Management and Asset Building)** to avoid reducing the vital importance and impact of all financial and income services provided to our members. CMCA operates a nationally recognized Rural LISC Financial Opportunity Center® (FOC), requiring us to use *all* of the currently available services in our FOC program delivery model as we help members work toward economic growth goals.
- CMCA recommends clarifying **SRV 4a** as written "The number of individuals who received rental payment assistance (e.g. emergency rental payments and deposits) does not accurately distinguish between one time assistance such as the examples given and ongoing assistance such as Housing Choice Voucher (HCV) program. There is no applicable service besides 4h-other that would accurately capture HCV. This unnecessarily complicates the reporting process.
- CMCA recommends removing **SRV 5s** "The number of individuals who participated in community gardening activities." This would be near impossible to track and relates to a community level initiative, therefore should be a strategy.
- CMCA recommends reinstating **SRV 6b (CSBG Annual Report 2.1)**- Leadership Training as currently written. CMCA holds Step Up To Leadership training for our low-income members to develop civic engagement and leadership skills. We are able to recruit low-income board members for both our own non-profit and other partner agencies in our communities once they have completed the 12 week course. The CSBG Act clearly articulates the requirement to engage and empower low-income persons

and revitalize communities. Removing Leadership Training eliminates our capacity to report on the work done in this domain area.

- **SRV 6c** appears to be missing in CSBG Annual Report 3.0

Specific recommendations to the proposed outcome (FNPI) changes in CSBG Annual Report 3.0 include:

- CMCA recommends adding the age criteria to the definition of **FNPI 1a** (youth) and definition of **FNPI 1b** (adults). It is misleading as those without detailed knowledge of ROMA NPIs would erroneously count those 18 and older as adults. We recommend adding (25 and older) to Adults in FNPI 1b and (up to age 24) in FNPI 1a Youth definition.
- CMCA recommends keeping “z” level indicators in the Annual Report 3.0. This allows individualization of our services. These specific indicators allow us to record measurable gains or losses in innovative programming and evaluate their effectiveness.
- CMCA’s understands the importance of measuring employment retainment and recommends keeping an **employment retention FNPI** to measure adults who maintain employment for 180 days as a measure of economic mobility.
- CMCA recommends keeping **FNPI 2d: *The number of children and youth who are achieving at basic grade level (academic, social, and other school success skills)***. This outcome is used at our agency and assists in showing the impact of our Whole Family Approach and Head Start programs. It is unnecessary to break down this data point by grade level. Keeping FNPI 2d without grade level specification will reduce the administrative burden while allowing us to continue reporting this critical outcome.
- CMCA recommends adding an education FNPI regarding parenting as **CSBG Annual Report 2.1 FNPI 2e** reads: *The number of parents/caregivers who improved their home environments* remains as written. Working in close partnership with Children’s Division and child abuse prevention, the home environment is often a focus of goal development in our Whole Family Approach and Family Pathways Framework.
- CMCA operates a Financial Opportunity Center as well as a Women’s Business Center. The changes proposed in **FNPI goal area 3** is quite limiting and does not capture the breadth and scope of our financial focus. CMCA recommends not changing any current Income domain NPIs as they are written in Annual Report 2.1.
 - **FNPI 3a** is a means to an end, not a goal as written “*The number of individuals completing income and asset building training.*”
 - **FNPI 3b** “*The number of individuals in one or more assets (e.g. savings account, IDA, home purchase, reduced debt).*” Grouping these individual financial outcomes together substantially reduces the story of our impact on financial security and the breadth of services we provide.

- **FNPI 3d** *“The number of individuals with an increase in public benefits to assist with income (e.g child support, health insurance, SSI, Veterans, TANF, SNAP)- CMCA recommends adjusting the wording to **“The number of individuals who **obtained or increased** public benefits to assist with income.”***
- CMCA recommends combining **FNPI 4c** and **FNPI 4d** to read *“The number of individuals who avoided eviction or foreclosure.”*
- CMCA recommends a new **Housing FNPI** is written and added to CSBG Annual Report 3.0 to reflect those that reduced their reliance on public subsidies (ex: Housing Choice Voucher) to maintain safe and affordable housing.
- **FNPI 5b** is poorly worded. If a new doctor’s office opens, I do not believe you want us to count all members in that county that now have access to health coverage. We recommend returning to the wording in CSBG Annual Report 2.1 of *“obtained health insurance.”*
- **FNPI 5d** is poorly worded. Are agencies that provide health clinics supposed to count all members in the county? Recommend revising the wording to clarify the intent of this indicator.

Module 3, Section C: All characteristics report

- **2. Age:** The age divisions of “0-4” and “5-17” do reflect the fact that most schools accept 5-year-olds for kindergarten but do not reflect that HS serves children through age 5.
- **3. Education Levels:** It is unclear where to count vo-tech certifications. It's not exactly "some post-secondary" if they have finished and are credentialed. But "graduate of other post-secondary school" could be interpreted as Graduate school. CMCA recommends adding another Education Level option.

Module 4, Section B: Community National Performance Indicators

- **CNPI 1c** *“Number of “living wage” jobs created in the identified community”* and **CNPI 1d** *“Number of “living wage” jobs maintained in the identified community”* The wage set by the employers is out of our control unless they are jobs the Community Action Agency actually creates itself for its own staff. Including these indicators also confuses the narrative being told by **CNPI 1a**.
- **CNPI 1e** *“Number of jobs created in the identified community with a benefits package”* Without contacting every employer that is part of an Employment task force in our area, which is an unreasonable burden for reporting expectations, how do we accurately measure this indicator?
- **CNPI 1h** *“Percent decrease of the underemployment rate”* Agencies do not have a source to accurately measure this data. Please provide a reliable and valid source where this information can be collected if required in Annual Report 3.0.

- **CNPI 2c** *“Number of new early childhood screenings offered to children (0-5) of families with low incomes in the identified community.”* CMCA recommends removing the word “new” in the FNPI verbiage. If a CAA is already providing this service, they are still contributing to early childhood education in the community.
- **CNPI 2g** *“Percent increase of children in the identified community who are kindergarten ready”* This is an impossible indicator to measure within our service area due to the lack of state infrastructure responsible for data collection.
- **CNPI 2o** *“Percent increase in the adult literacy rate in the identified community”* is a valid indicator, however CMCA lacks a reliable and valid source to track this information. The one data source we have is several years old and does not have funding to continue to our knowledge. Please provide a reputable data source for this indicator.
- **CNPI 3g** *“Percent increase of transportation services in the identified community”* is sufficiently captured under the Infrastructure Counts of Change. CMCA recommends removing this CNPI as unnecessary and repetitive.
- **CNPI 4h** *“Percent increase of affordable housing in the identified community”* This is a value add to the Annual Report, however the data is not accessible. This data is only available via a subscription, requiring added costs (estimated several thousand dollars per year) to access this data point which is a fiscal burden we are not able to accept. Please provide access to this data if it is to be in our Annual Report.
- **CNPI 5j** *“Percent decrease in uninsured families in the identified community”* is problematic as written because uninsured counts only reflect individuals. Data is not currently available for families or households. CMCA recommends changing the indicator verbiage as written from “families” to “individuals”
- **CNPI 5l** *“Percent decrease in unplanned pregnancies in the identified communities”* wording is problematic in that it suggests that unplanned pregnancies equate to unwanted pregnancies.
- **CNPI 5m** *“Percent decrease in substance use disorder rates in the identified community”* These are reported as separate rates by the items listed as examples in parenthesis: cigarettes, prescription drugs, narcotics, alcohol, so more clarification would be needed from OCS as to how this figure should be calculated if you intend to aggregate this nationally.
- CMCA recommends combining **CNPI 5o** *“Percent decrease in the child abuse rate in the identified community”* and **CNPI 5p** *“Percent decrease in the child neglect rate in the identified community.”* This helps eliminate the reporting burden and the rate is commonly reported together.
- CMCA recommends combining **CNPI 5q** *“Percent decrease in the elder abuse rate in the identified community”* and **CNPI 5r** *“Percent decrease in the elder neglect rate in*

the identified community." This helps eliminate the reporting burden and the rate is commonly reported together.

- Rates of change for **Civic Engagement and Community Involvement indicators CNPI 6.G2a, CNPI 6G2b, CNPI 6G2c, CNPI 6G3a and CNPI 6G3b** should be counts, not rates of change. These indicators should be recorded as a total count of people. CMCA is recommending changing the wording to "*count of*" instead of "*percent increase*" for all five CNPIs in this Domain.
- This section of the Annual Report needs specific instructions added on reporting **baseline percentages** (in year one of a community level initiative) **vs percentage increases**, which is how many CNPIs are worded to ensure consistency in annual reporting across states.

Module 4, Section C: Communities Strategies:

- **Education and Cognitive Development-** The Community Strategies are currently missing a strategy that reflects child care creation and expansion. The creation of this strategy could be done by consolidating and adding language to Strategy 7 with Off-Hours Child Care.
- **STR 21 Adult Education Establishment-** CMCA suggests adding "and Expansion" to this strategy language to record our efforts in this area.
- **STR 5d Gun Safety and Control Campaign-** CMCA suggests removing the language of "and control" as it politicalizes the issue.
- **Health and Social or Behavioral Development Strategies-** Safe policing was reflected in the CNPI's but is not represented in these community level strategies.
- CMCA recommends combining **STR 6 G2e** "Build and Support Increased Equity" **and STR 6 G2f** "Equity Awareness Campaign" to reduce administrative burden, as both strategies imply the same activities and lead to the same outcome.

It is crucial for agencies to be able to *individualize* their Community Services Block Grant (CSBG) funds to create plans to address the needs that arise from the triennial Community Needs Assessment (CNA) process through their internal Strategic Plan. The CSBG Act *requires* CAA's to develop services and community initiatives in direct response to identified community needs. The needs and strengths are vastly different between geographic regions in the United States, and the current selection of CSBG NPIs and services allows us to reflect our unique combination of services within the current Annual Report.

In closing, Central Missouri Community Action (CMCA) appreciates the opportunity provided by the Office of Community Services to provide feedback on the proposed CSBG Annual Report version 3.0. We hope you will carefully review and consider the feedback

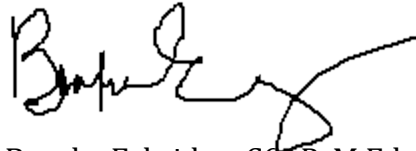
provided from CMCA and our Community Action colleagues across the United States in making final decisions that impact the overall health and well-being of the Community Action Network.

Please feel free to contact CMCA Executive Director or Family & Community Services Director regarding any additional questions or clarification needed.

In Partnership,

A handwritten signature in blue ink that reads "Darin Preis".

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A handwritten signature in black ink that reads "Brooke Eskridge".

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