



April 13, 2016

Ms. Jenae Bjelland, Executive Director
NASCS
111 K Street, NE Suite 300
Washington, DC 20002

RE: ROMA Next Generation

Dear Ms. Bjelland:

Thank you, NASCS, and the federal Office of Community Services for all the work you have put into the ROMA Next Generation efforts. This has truly been a significant undertaking. We have been pleased to have been part of the ROMA Next Generation Work Group and have seen first-hand the significant time, thought, and effort that has been put into the materials that were posted for review last month. We also respect the dedication to excellence that NASCS and OCS has brought to the table and strongly believe that all efforts are directed at improving Community Action for the long term. Your willingness to extend the reporting period was appreciated and gave many in the Community Action Network a chance to become more familiar with the details before responding.

Based on experience garnered from the CSBG Organizational Standards project, the Partnership believes the more transparency the better, and that frequent communication with the CSBG/Community Action Network is a requirement for success. The work is not easy at any level (local, state, and federal) so it is important to be as clear on the details as possible, and to not let the "perfect be the enemy of the good". The final CSBG Organizational Standards recommended by the Center of Excellence were the result of identifying and adapting best practices, finding room for compromise, and intensive Network-wide dialogue.

We believe that all levels of the Network are working toward the same goal and we look forward to finding a balance of what we would like to see happen with what can happen to improve the Network. NASCS and OCS will likely receive significant feedback from the Network on ROMA Next Generation as the Partnership did for the CSBG Organizational Standards. This feedback can make for a challenging process but will make the final product stronger.

In that spirit, we provide the following comments and recommendations for consideration. Note, some of the items below have been raised in previous communications and meetings but are restated here given their lack of inclusion in the materials out for comment currently.

NATIONAL OFFICE

1140 Connecticut Avenue, NW
Suite 1210
Washington, DC 20036

PHONE: 202.265.7546
FAX: 202.265.5048

info@communityactionpartnership.com
www.communityactionpartnership.com

CHIEF EXECUTIVE OFFICER

Denise L. Harlow, CCAP

EXECUTIVE BOARD

Thomas P. Tenorio, CCAP
Board Chair
Chico, CA

Bryan Duncan
1st Vice Chair
Statesville, NC

Peter Kilde
2nd Vice Chair
Glenwood City, WI

Elizabeth "Biz" Steinberg
3rd Vice Chair
San Luis Obispo, CA

Dalitso S. Sulamoyo, CCAP
Secretary
Springfield, IL

Bradley S. Manning, CPA
Treasurer
Weatherford, TX

The Partnership recommends the following:

1. **Remove Social Indicators/Population Indicators.** As we noted during ROMA Work Group meetings, the Partnership is very concerned about the use of social indicators in ROMA reporting. Programs and services provided by local Community Action Agencies do not operate in isolation and social indicators are impacted by numerous actions outside the scope and control of a local Community Action Agency. Inclusion of items such as community literacy rates, foreclosure rates, crime rates, high school graduation rates, emergency response time, etc. is inappropriate. Even if CAAs were able to narrowly define their “community”, this type of reporting becomes inappropriate for rolling up to the state or national levels, and collecting data from existing sources would not be accessible or at minimum, extremely challenging.
2. **Reinstate an Agency-focused goal.** The Partnership believes a core foundation of Community Action is the infrastructure of local agencies located across the US to serve families in rural, urban, and suburban America. Including the scope of the national Network into the Theory of Change was a start; however, it is not sufficient from the Partnership’s perspective. We have been consistent in our call for ongoing agency improvement and the need for federal and state investments and improvements as well as the need for local agencies to invest in their own improvement. The CSBG Organizational Standards are an important element in setting national expectation, but setting a national goal for agency improvement is necessary in our view to maintain focus on network-wide quality improvement over time and is in line with the purpose and intent of the CSBG Act.
3. **Remove the Baseline Characteristic Report but retain the All Characteristics Report.** Aggregate reporting of the number and characteristics of customers served by Community Action each year is important data to be collected and is required by the CSBG Act. However, the proposed Baseline Characteristic Report will require additional work for local CAAs and will not provide information that is useful or comparable at a state or national level. Analysis by individual/ family or a set of individual/families that participate in agency programs is very appropriate at the local level and often takes place in the course of program reporting. However, an aggregate report such as the one proposed has little value or usefulness given how local agencies operate and how customers access services. *It would be a much better use of resources to develop tools to help local agencies do internal analysis rather than attempt to have an aggregate report at the state or federal level. Improved local analysis would be a significant outcome for ROMA Next Generation.*
4. **Extend the rollout date out by another year.** While we appreciate that October of 2017 appears to be far into the future and provides ample ramp up time, 18 months is not a long time for agencies and state offices to make needed infrastructure and organizational changes. In addition, *six states will see rollout even sooner* due to contract start dates of July 1, 2017, less than 15 months from the date of this letter. Given the late rollout of the ROMA Next Generation materials, this 15-18 month window is very small. Extending rollout by at least one year would be appreciated. However, if significant changes are made to the final OMB submission that decreases the number of changes for local agencies and state CSBG offices to accommodate, this recommendation could be reconsidered.
5. **Increase and focus investments on Training and Technical Assistance.** As with CSBG Organizational Standards, local CAAs, State Associations, and State CSBG Offices will need training and technical assistance to increase familiarity with the new reporting requirements and voluntary tools. With the current limited T/TA capacity in ROMA and reporting, there is a limit to how much training can be provided. As we have found, intensive training is well received and beneficial to local agencies and State CSBG offices but this takes time, preparation and engagement. Increased T/TA investments should be made via State Associations/RPICs, national CSBG partners, State CSBG Offices and local CAAs themselves.

6. **Add clarity to the Individual and Family Services List and the corresponding Report regarding the role these tools play in the performance measurement and management sphere.** It is important to note that the services list and corresponding report are summary documents of outputs and activities and that the Community Action Network is well versed in outcome reporting. Local CAAs appreciate having space to report on programs and services; however, we need to be clear about the role these reports play and that we are not confusing the two.
7. **Be clear about what is not changing and what is voluntary.** The amount of information provided has been overwhelming for many. Much of what is being proposed is not new. Clarify what is not new and focus attention on the new elements. In addition, clarify those resources that are for internal use only and voluntary in nature.

As NASCSP and OCS review the Network's feedback on the proposed changes and develops products for the initial OMB review process, we urge you to consider the following recommendations for the next ROMA Next Generation development phase.

1. **Convene 15-20 local Community Action Agency experts in person, as soon as possible, to review and to assist in developing the final recommendations for the 30-day OMB Comment period.** While ideally convened prior to the OMB submission for the 60-day comment period, we recognize that would be incredibly challenging. This new, temporary group should include experts from high performing local CAAs who have expertise in data collection, current reporting through the Information Survey, and use of data at the local level to review. CAAs that responded to the surveys or sent separate communication should be considered. The ROMA Next Generation Workgroup had elements of this structure; however, the work group needed to include representatives from across the Network and too many of us were not local agency experts (myself included). To effectively implement the final changes to the reporting system, we will need buy-in from local CAAs. Investing in that buy-in now by bringing together respected and talented individuals together is critical. These experts can see the holes in the draft materials, they can find the opportunities for improvement, and they will know best how local agencies can best adapt. Timing of convening such a group is challenging. However, once the materials are submitted to OMB for the 60-day comment period (or about June 1), there is a window where this group can take the material submitted, dive into the proposals, and assess the strengths and opportunities as well as make concrete recommendations for improvement based on local needs. This would be concurrent with broader Network assessment and feedback on the materials submitted. The ROMA Next Generation Work Group served (and will continue to serve) a valuable purpose; however, we believe that a group of local CAAs that come from a blend of rural/urban, public/private, and small/large can help the project move to the next level and add real value to the final product to be developed for OMB review later this fall. Such a group will also increase acceptance within the Network.
2. **Change the project name/description to better reflect work being done.** The work done to date is in reality less about ROMA Next Generation, and primarily focused on *Reporting/NPI Next Generation*. The project is not changing the ROMA cycle, there is not a new curriculum to become a Certified ROMA Trainer, and the core elements of ROMA (assessment, planning, implementation, data collection, and analysis) are not changing. ROMA Next Generation is mainly focused on modernizing the National Performance Indicators which is a part of the ROMA cycle but has led to confusion in the field. ROMA trainers are the first to say that ROMA is not only about reporting and we are concerned that by calling it ROMA Next Generation, we are confusing the issue. While better analysis is a part of the current ROMA Next Generation work scope, the bulk is around reporting. Consider narrowing the name of the project so

that concerns about changing NPIs do not impede agencies from continuing to incorporate ROMA principles into their work.

3. **Recognize the time needed to fully inform and educate a network the size of Community Action about the work of ROMA Next Generation is significant.** While the national partners have been working on ROMA Next Generation for three years and State Associations/RPICs and State CSBG Offices have been a part of ongoing discussions during that time, local CAAs are the last to pay close attention to the detail on this work given the myriad of responsibilities they have in the field, the number of programs they operate, and the day to day challenges of running local agencies. They have been primarily focused over the last year preparing to meet CSBG Organizational Standards, the last large-scale national effort, and have not been as focused as the national partners and associations/state offices have been on ROMA Next Generation. The timeline to educate 900+ CAAs, 40+ State Associations, 50+ State CSBG Offices through webinars and conferences that only a subset attend, is challenging. We do work closely with OCS, NASCSP, CAPLAW, NCAF, State Associations/RPICs, and State CSBG Offices to rollout information and training, but something as large as this, with as many details that are currently included, the time to fully inform is much greater than the time that has been provided to date. Rollout and education cannot stop during this next phase while you prepare for OMB comment and clearance, it must continue.
4. **Consider Scaling Down.** Given the breadth of the Network and desire for success, we urge NASCSP and OCS to consider scaling down the breadth of materials and components to the core elements. We all want the Network to be successful and improving the reporting is key. We have to balance our desire to move the Network forward with what a national network like ours can do efficiently and effectively. Yes, CSBG and the NPIs are all about the entire agency. However, with less than \$700 million coming into the Network, we have to balance expectations with capacity. If a segment of the proposed reporting is better to be internally used, pull it out and talk about it separately as a good practice and encourage local voluntary usage.
5. **Continue and Increase training on the proposed ROMA Next Generation components.** The April 2016 webinar series was helpful to some extent but shorter, more focused training and webinars need to be consistently conducted. We cannot stop getting information out on elements during this next step in the process. For instance, the stability measure questions fell at the end of a webinar, yet we need to ensure the Network is familiar with the options. The Collective Impact worksheets are comprehensive, yet understanding the detailed components takes time and the broad webinar overview was too much for many to absorb. Many of us are in the field in April/May/June training and need to include pieces in our presentation. Ongoing webinars should be conducted if possible. We cannot wait until the materials are finalized for OMB to pick the training and outreach mantle back up and we need this communication now.

As you compile, finalize, and submit materials to OMB for the 60-day comment period, the Partnership will:

- **Continue to work with NASCSP and OCS on the ROMA Next Generation Workgroup and other activities to help improve the Network's performance measurement and management system.** We will continue to be engaged and be as helpful as we can. We look forward to working with you on the next steps in the process.
- **Host at least 11 regional web meetings in partnership with the RPICs following the release of the 60-day OMB comment period.** These web meetings will be used to review the documents' elements, expose as many local agencies in the Network to the information as possible, and identify the core areas of local agency concern. We will work with you and OCS to ensure we are not duplicating efforts. The webinars hosted by NASCSP and OCS in March were well received. We hope through our added voice we might be able to reach additional layers of agency participation.

- **Provide space for up to 10 workshops (across five workshop blocks) for ROMA Next Generation training sessions at our annual convention in Austin, TX August 30-September 2, 2016 and additional sessions at our winter Management and Leadership Training Conference.** NASCSP and OCS do not have to utilize all slots, and the Partnership may design sessions as well, but please know space is available for your use. Sessions for board members, leadership staff, and frontline staff may all look different. In addition, you may want sessions focused on individual and family as well as community and you may choose to replicate sessions over the course of the conference. We hope this gives you the space needed to be creative and responsive to the Network's needs. Our winter conference is still in the development phase and we look forward to incorporating ROMA Next Generation into it as well.
- **Continue to train and connect the pieces between CSBG Organizational Standards and ROMA with local agencies, state associations, and state CSBG offices.** An outcome of the overall Performance Management investment OCS has made is the call for more intensive and connected trainings. Both the Partnership and NASCSP have been called to provide more frequent training on tying needs assessments to strategic plans to CAP plans. This type of training can move the needle on performance management and we believe this increase in training requests is measure of the impact of the work done to date on CSBG Organizational Standards and the promise of ROMA Next Generation. CAAs, State CSBG Offices, and State Associations are increasingly seeking out this full day/multi-day training. They are making investments in their board and staff to ramp up the connections of local needs, to agency vision, to implementation and data collection and analysis. We look forward to conducting more of these trainings and incorporating the elements from the ROMA Next Generation process and working with you to develop consistent training curriculum.

Thank you for all of your efforts. We look forward to our continued partnership on ROMA Next Generation and modernizing our performance measurement and management systems. Please contact me with any questions or concerns at dharlow@communityactionpartnership.com and 202-595-0660.

Sincerely,

Denise L. Harlow

Denise L. Harlow, CCAP
Chief Executive Officer