

ROMA Practitioners Meeting

CSBG Draft Annual Report

Review and Discussion

60-Day Comment Period Feedback

September 20-21, 2016

Meeting Goals

- Bring together a small group of ROMA practitioners to consider both strengths and concerns about ROMA Next Generation and the current version of the draft CSBG Annual Report.

Meeting Goals

- Review the major concerns raised.
- Recommend adjustments or replacement of elements that may not be adequate to our purpose in their current form.
- Recommend changes to language or focus for elements that are strong, but need improvement to be most useful to the entire network.

Overview

OMB 60-day Comment Period

- Over 130 comments were received from the Network during the FRN #1 period of June 16 – August 15, 2016.
- OCS and NASCSP staff conducted a review of the comments to inform modifications to the CSBG Annual Report for the final OMB 30 day comment period.

MAJOR AREAS OF CONCERN

MODULE 1

STATE ADMINISTRATION

Major Areas of Concern

Module 1 | State Administration

Section B - Statewide Goals and Accomplishments

- B.2 and B.3: Eligible Entity Overall Satisfaction Targets /Eligible Entity Feedback and Involvement
- B.7: Summary Analysis

Section D - Organizational Standards for Eligible Entities

- D.2: Organizational Standards Performance

B.2 Eligible Entity Overall Satisfaction Targets

B.3 Feedback and Involvement

Issue: State reporting on CSBG Eligible Entity ACSI Survey Result, Prior Year Target and Future Target

Concerns expressed about--

- States not informed of reporting requirements and responsibilities
- Lack of guidance (IM) and tools
- Need for statistically significant data/response rate
- Ability of OCS to administer survey on a regular basis and provide timely feedback to the States

B.2 Eligible Entity Overall Satisfaction Targets

B.3 Feedback and Involvement

OCS Updates to Communicate:

- IM was issued/webinar conducted in late August re: use of the ACSI and how to set targets.
- This is a requirement in the MSP; B.2. merely allows for states on 2-Year Plans to provide a target. In an ideal world, this would also allow states to update their score (if new data is available in time).
- OCS intends to conduct the ACSI Survey on a regular basis and to provide timely feedback to the States *as occurred for the first survey*.

B.2 Eligible Entity Overall Satisfaction Targets

B.3 Feedback and Involvement

OCS Updates to Communicate:

- OCS, in collaboration with the States, expects over time to achieve enhanced response rates. First survey provided data at an *80% confidence level* with confidence intervals (CI) mostly within reasonable ranges. Most important, the information provided was actionable no matter the CI.

OCS Comment

B.7. Summary Analysis

Issue: State to provide an *analysis* of performance data provided in the Annual Report

Concerns expressed about—

- Section is brand new and “not properly vetted/ commented upon”; should be dropped.
- Requires going beyond reporting the data and instead have to conduct sophisticated data analysis requiring additional time; exceeds the capacity of many state CSBG Lead Agencies to provide meaningful information. Too subjective.
- Requires asking the eligible entities for information beyond what is in the AR; adds to the reporting burden.

B.7. Summary Analysis

Concerns expressed about—

- Analysis is contextual; questions should not be mandated but merely examples of how data could be analyzed
- Language about states “encouraging” local entities to change based on state analysis could be viewed as intrusion on local authority. Alter or eliminate.
- States need T&TA to identify questions and procedures to guide state-level analysis.

B.7. Summary Analysis

Options to Discuss:

Option 1: Revise questions asked in B.7.

Option 2: Eliminate B.7.

B.7. Summary Analysis

Option 3: Move a much scaled back “analysis” section to *Section 1.4. State Feedback on Data Collection, Analysis and Reporting*

- Rework 1.4.--Reference State Accountability Measure 5.Sii requiring States *to provide individual written feedback on each eligible entity’s performance in meeting ROMA goals.*

- Add questions such as:

- Did the State provide feedback to each eligible entity within 60 days of submitting the Annual Report?

- Describe the state’s process for providing feedback to the eligible entities.

- What notable trends/issues did the State identify

- And/Or???

Module 1 | Section D.2

ISSUE: Question on number of entities that met all State-adopted Organizational Standards is formulated as an “all or nothing” approach.

OPTIONS FOR DISCUSSION:

Option 1 – Maintain current question/measure

Option 2 – Keep current measure, but allow for ranges for reporting in the table

Option 3 – Add table with reporting on # of entities that meet each standard

Module 1 | Section D.2

OPTIONS FOR DISCUSSION

Option 4 – Add table that asks for # of entities that meet all standards in specific areas (e.g. human resources--less imposing smaller table, more meaningful buckets)

Option 5 – combo of #2 & #4 – broad categories and # of EE's meeting these within various ranges, etc.

Option 6 - Have categories - # of agencies who met standards within category (IE HR; Fiscal); at the end of the table, how many agencies met 100%

MAJOR AREAS OF CONCERN

MODULE 2

AGENCY EXPENDITURES, CAPACITY AND RESOURCES

Areas of Concern | Module 2, Agency Expenditures, Capacity and Resources

Section A - Local CSBG Expenditures

- Placement of Administration in Table

Section B - Local Agency Capacity

- The current proposal does not include a national goal for agency capacity

Module 2 | Placement of Administration in Table 1

Issue: Placement of Administration in Table 1, CSBG Expenditures; alignment with IM 37 and network feedback.

Concerns expressed:

- Admin should not be included as a secondary question
- Admin in CSBG cannot be directly tied to an activity or domain
- Current proposal would cause duplication in reporting CSBG expenditures.

Module 2 | Placement of Administration in Table 1

RECOMMENDATIONS FROM THE FIELD:

- Create a new line item for Administration in Table 1.
- Keep Administration as a secondary line item and add instructions that indicate that each domain includes both direct program expenses and any supporting administration costs.

OCS Comment

Module 2 | National Goal on Agency Capacity

ISSUE: CSBG Annual Report does not include an agency level goal or any indicators of success. Agency capacity reporting in Module 2 is not seen as sufficient.

RECOMMENDATION FROM THE FIELD

- Add a goal on agency capacity. Agency capacity building expenditures and activities are included in Module 2 and reinforce the need for an agency level goal.

MAJOR AREAS OF CONCERN

MODULE 3

COMMUNITY LEVEL

Module 3 | Community Level

Section A: Community Level Initiatives

- Community Initiative Status Page
- Inclusion of Collective Impact

Section B: Community Level NPIs

- Use of Social Indicators
- Use of Percentages and Rates
- Baseline

Module 3 | Inclusion of Collective Impact

ISSUE: Collective impact (CI) is one of many strategies that can be used to achieve community level change.

RECOMMENDATION FROM THE FIELD:

- Remove all CI options in the reporting forms.

OCS Comment

Module 3 | Status Page

ISSUE: What elements to include in the Community Level Status Page

RECOMMENDATIONS FROM THE FIELD:

- Use a system that allows CAAs to report 1) the domain, 2) strategies, 3) target population, 4) Outputs or Counts (CAAs get credit for activities that move the initiative forward, but hadn't yet resulted in outcomes).
- Use a narrative format.

Module 3 | Community Measures: Social Indicators, Percentages, and Rates

ISSUE: Inclusion of social indicators, percentages, and rates in the Community Level NPIs.

CONCERNS expressed about:

- Utility of the indicators at all levels;
- Availability of data;
- Fact that the conditions being measured are often impacted by many causes beyond the influence of an initiative;
- Potential for data to be misinterpreted in negative ways.

Module 3 | Community Measures: Social Indicators, Percentages, and Rates

RECOMMENDATIONS FROM THE FIELD:

- Remove all social indicators and any indicators that include a rate. This includes, but is not limited to:
 - graduation rates, infant mortality rates, child and adult obesity rates, homelessness rates, home ownership rates, immunization rates, teen pregnancy rates, substance abuse rates, etc.
- Remove all percents from the indicators.

Module 3 | Community Measures: Social Indicators, Baseline, Percentages, and Rates

RECOMMENDATIONS FROM THE FIELD

(cont.):

- Categorize the social/population level indicators as developmental indicators that could be assessed and modified.
- CAAs report the types of community-level work they are engaged in, the number of initiatives, and the types of social indicators they review at the local level as part of their work.

Module 3 | Community Measures: Social Indicators, Baseline, Percentages, and Rates

RECOMMENDATIONS FROM THE FIELD (cont.):

- Replace demographic impact measures with the actual goals of the projects.
- Provide sample indicators of impact that are appropriate for measuring community impacts, but are not the equivalent of totaling up a large number of individual outcomes.

Module 3 | Baseline

ISSUE: Baseline data may not be available.

RECOMMENDATIONS FROM THE FIELD:

- Remove/modify the sentence about “justifying” the initiative.
- Remove numerical baseline data as a data point on the data entry forms.
- Remove baseline data point and provide a narrative describing the initiative.

MAJOR AREAS OF CONCERN

MODULE 4

INDIVIDUAL AND FAMILY LEVEL

Areas of Concern | Module 4, Individual and Family Level

Section A: Characteristics for NEW Individuals and Households

- Unduplicated count
- Concerns related to the addition of this report

Section B: All Characteristics

- Unduplicated count

Section C: Individual and Family NPIs

- 90/180 day follow up
- Stability indicators

Module 4 | Unduplicated Counts

ISSUE: Agencies do not have the capacity to provide a truly unduplicated count for Module 4 sections.

RECOMMENDATIONS FROM THE FIELD:

- Consider adding back in the "total unduplicated number of all individuals about whom no characteristics were obtained" and "total unduplicated number of all households about whom no characteristics were obtained."
- Remove the expectation that all organizations will have 100% unduplicated data.

OCS Comment

Module 4 | Characteristics for New Households and Individuals Report

ISSUE: NEW Characteristics Report would create challenges with CAA's reporting systems.

RECOMMENDATIONS FROM THE FIELD:

- Remove the NEW Characteristics Report.
- Consider prioritizing what data is most important to collect to demonstrate the greatest impact of our work. It will also be important to provide clear instructions on what is meant by some of the terminology, and how agencies are expected to gather the data and document it.
- Provide guidance on when to collect data.

OCS Comment

Module 4 | 90/180 Follow Up

ISSUE: Agencies are concerned about follow up.

RECOMMENDATIONS FROM THE FIELD:

- Add an outcome, possibly under the stability indicator, that would capture the immediate outcome achieved as a result of emergency/one-time/ or immediate services.
- The instructions should clearly state that CAAs are only expected to report on these outcomes if tracking these indicators is already a part of programs that are specifically designed and funded to include follow up (e.g. WIOA).
- Commenters suggest removing all follow up/tracking.

OCS Comment

Module 4 | 90/180 Follow Up

Housing

Goal 1: Individuals and Families with low incomes are stable and achieve economic security.

Name of Agency Reporting:

	Served	Targeted	Achieved	% Achieved	% Planning
Housing	I.) Number of Participants Served in Program(s) (#)	II.) Number of Participants Expected to Achieve Outcome in Reporting Period (Target) (#)	III.) Number of Participants Achieving Outcome in Reporting Period (Actual) (#)	IV.) Percentage Achieving Outcome in Reporting Period [III / I = IV] (%) (auto calculated)	V.) Planning accuracy (in percent) (III/II = V) (%) (auto calculated)
1. The number of households experiencing homelessness who obtain safe temporary shelter.				(% auto calculated)	(% auto calculated)
2. The number of households who obtain safe and affordable housing.				(% auto calculated)	(% auto calculated)
a. Of the above, the number of households who maintain safe and affordable housing for 90 days.				(% auto calculated)	(% auto calculated)
b. Of the above, the number of households who maintain safe and affordable housing for 180 days.				(% auto calculated)	(% auto calculated)



Module 4 | Stability Indicators

ISSUE: Commenters are concerned about duplication and the appropriateness of each stability indicator.

RECOMMENDATIONS FROM THE FIELD:

- Remove the indicators.
- Narrow the identification of achievement of outcomes to those represented in these three NPIs: Employment, Education, and Income/Asset Building, as these represent movement to economic stability.

Module 4 | Stability Indicators

RECOMMENDATIONS FROM THE FIELD, cont.

- Allow states to use their own self sufficiency scales to measure progress; reporting number/percent of individuals who achieved stability according to these scales.
- Include an indicator that would demonstrate the number and percent of individuals and families who achieved an immediate outcome or avoided/reduced a crisis, such as “the number and percent of individuals / families who avoided or reduced a crisis.”

OCS COMMENT

MAJOR AREAS OF CONCERN

FOCUS FOR DISCUSSION

Major Areas of Concern | ROMA Practitioners Discussion

1. **Module 3: Community Level Reporting**
 - a) **Community Measures: Social Indicators, Percentages, Rates, Baseline**
 - b) **Status Page**

2. **Module 1, Section D.2: Organizational Standards Performance**

3. **Module 2: National Goal on Agency Capacity**

Module 3 | Community Measures: Social Indicators, Baseline, Percentages, and Rates

ISSUE: There is concern about the inclusion of social indicators, baseline data, percentages, and rates in the Community Level NPIs.

Module 3 | Community Measures: Social Indicators, Baseline, Percentages, and Rates

DISCUSSION QUESTIONS:

- What *community-level change* do the Community Action Agencies strive for?
- How can we best measure/show the impact that CAAs have on community-level problems?
- How will we know that the CAA/Network has made a difference?

Module 3 | Community Measures: Social Indicators, Baseline, Percentages, and Rates

Using the NPI lists (proposed and commenters recommended revisions) discuss:

- What NPIs will best--
 - Demonstrate CA's accomplishments in helping to make *communities where people with low incomes live healthy and offer economic opportunities.*
 - Provide data to help the network identify and learn from the efforts that are making a difference in communities.

Module 3 | Community Level Reporting - Status Page

ISSUE: There are concerns about the value of the information collected on the Community Level Initiative Status Page.

Module 3 | Community Level Reporting - Status Page

DISCUSSION QUESTIONS:

Using the sample Status Page discuss--

- What data points are needed at the local level and state levels? National level?
- For what purpose?
- What data would not be rolled up and what data could be rolled up?

Module 1 | Section D.2

ISSUE: The question on number of entities that met all (100%) of State-adopted Organizational Standards is formed as an “all or nothing” approach.

Module 1 | Section D.2

DISCUSSION QUESTION

Which of the six options will most easily aid in:

- Identifying where areas for improvement exist
- Identifying where T&TA could support or strengthen
- Moving CA to full compliance with the Org. Standards

Module 2 | National Goal on Agency Capacity

ISSUE: CSBG Annual Report does not include an agency level goal or any indicators of success. Agency capacity reporting in Module 2 is not seen as sufficient.

Module 2 | National Goal on Agency Capacity

DISCUSSION QUESTIONS:

- What outcomes/NPIs would be established for local CAAs and State CSBG offices if an Agency goal was re-established?
- Is there another way to capture the importance of agency capacity other than as a national goal?