



To: Community Acton Network  
From: Denise Harlow, Community Action Partnership CEO  
RE: ROMA Next Generation/CSBG Annual Report Feedback Talking Points OMB PRA Clearance FRN #1  
Date: August 10, 2016

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**Introduction**

Thank you to the many local Community Action Agencies, State Associations, State CSBG Offices, National Partner organizations, and our colleagues at OCS for taking the time and effort over the past four years as we have worked together to respond to the Administrations' call for greater accountability. We have worked together at all levels on CSBG Organizational Standards, State and Federal Accountability Measures, the Model State Plan, and now ROMA Next Generation and the CSBG Annual Report. We have been successful in moving the needle with the administration and have increased Community Action's standing. But we still have more work to do, and this OMB/OCS 60-day comment period is a critical next step in the modernizing of the CSBG Performance Management Framework.

This past April, the Partnership, along with many CAAs, State Associations, and NCAF submitted comments as part of the informal comment period for ROMA Next Generation provided by OCS and NASCSP. The Partnership's comments outlined our primary concerns, offered recommendations for next steps, and offered our continued assistance with the effort. Unfortunately, most of the Partnership's recommendations were not included in the current OMB Clearance Package out now for review and comment and the Partnership has expressed disappointment to OCS and NASCSP. We have continued working since April to convey our concerns and make reasonable recommendations. However, the comment period is coming to a close and we have a responsibility to put our comments and perspectives on the record, in writing. We are sharing this Talking Points Memo with you as it will form the foundation of our final letter to OMB and OCS. Our feedback below is drawn from numerous conversations with local agencies, state associations, our national partners, and key consultants with deep experience in Community Action. It represents our current thinking and it provides possible talking points for others to consider when drafting local agency, state association, and state CSBG office comments. We believe NCAF is also drafting comments and we encourage the Network to review their document as well when submitting comment as it will likely include many on-point concerns and recommendations.

Please note several modules have “no comments” included.

This should not stop you as local CAAs, State Associations, or State CSBG Offices from adding comments in these and all sections. The Partnership needed to focus on certain areas and the “no comments” is not meant to imply full agreement with or support of each element included in the Federal Register package out for review.

We hope OCS and the Community Action Network will reach a compromise on the final submission for clearance later this fall. We believe the progress made to date since the January 2011 is significant, and we want to keep moving forward. We want to get the development work behind us so we can move forward together with the implementation of ROMA Next Generation. However, we must be sure the final product has value at all levels; is doable given limited financial resources, technological capacity, diversity of the Network (small/large, public/private, urban/rural/suburban), and limited T/TA funds; does not place an undue burden on states or local agencies; and truly improves our performance management system.

### **OMB Clearance Package**

The OMB Clearance Package is substantial and includes four modules, 76 pages, and hundreds of unique indicators and data elements to review. The Federal Register has requested that feedback focus on four questions and the Partnership provides talking points below in these areas. Detailed reviews of the package are posted on the NASCSP website at [www.nascsp.org](http://www.nascsp.org).

**We encourage you to review the NCAF email from August 4, 2016 that asked local agencies to conduct a good-faith estimate of the time burden to implement ROMA Next Generation.** NCAF is correct that we need to rely on local agencies to estimate the burden. It will vary by agency size and scope given each agency, and we urge you to do a good faith estimate. NCAF has a great list of considerations when developing your estimate and please reach out to them or the Partnership if you did not receive it.

**Responses need to be provided no later than August 15<sup>th</sup>** and we urge you to get your comments in as soon as possible via the formal process to [infocollection@acf.hhs.gov](mailto:infocollection@acf.hhs.gov). As NCAF noted in the email, even if you have already submitted comments, you can submit an addendum, attaching your original comments as well.

Our concern is focused in five core areas including:

- Module 1: Reporting on CSBG Organizational Standards and Technical Assistance Plans/Quality Improvement Plans for local agencies with unmet standards.
- Module 3: Community Outcome Indicators and Collective Impact
- Module 4: Characteristics for NEW Individuals and Households
- Module 4: Stability Measures/Indicators
- Modules 3 and 4-ROMA Goals: Lack of inclusion of an Agency Goal

While the comment format is truly challenging, we encourage you to frame your feedback based on the federal register structure modeled below to ensure consistency across our responses as a Network and clearly highlight our common areas of concern.

## Talking Points

### **Question 1. Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility.**

While there are elements that may be helpful, there are a number of areas detailed below where the collection of information does not meet the threshold of necessity or utility. The package as proposed in its entirety is overly burdensome, contains reporting tools that will provide useless information, and is outside the reach of the Community Services Block Grant (CSBG). However, with modifications, a system for collection of information can be developed that improves the performance management of the agency and has practical utility. Detail is provided here outlining where changes need to be made to reach a level of workability and utility.

- 1. Module 1: Modify the options CSBG State Lead Agencies/grantees have when reporting to OCS on CSBG Organizational Standards to allow for a broader range of responses.** As noted below, there are significant challenges with the way this information is being reported and creates a misuse of the Organizational Standards. Expecting constant perfection is unrealistic and does not have practical utility for local agencies or the State CSBG Lead Agency. As proposed, the single metric the State Agencies will report on will be the number of eligible entities that meet 100% of the CSBG Organizational Standards. To increase utility of the information, State Agencies should have the option to report the number of agencies at a variety of thresholds that still delineate strong performance or allow for a more accurate reflection of the training and technical assistance needs. For instance State Agencies should be able to report the number of local agencies that have met 100%, 90%, 80%, 70%, 60%, 50%, and less than 50% of the standards. This will allow for the collection of more accurate information; better tracking of results over time; and better, more efficient investment of training and technical assistance.
- 2. Module 4: Remove the Characteristics for NEW Individuals and Households Report.** This report has no practical utility at the local level given the time and expense to create it at each local agency. This is not necessary for agency performance, and the intentions outlined by OCS for its use are not reflective of how local agencies and states look at their communities to assess needs, develop programs, and report progress. It also lacks utility at the state level given that data such as this rolled up to the state level will be skewed by large population centers and decrease the practical utility of the data even further. In addition, many agencies may either lack management information systems with the capacity to disaggregate this type of data from its overall customer database, or struggle to integrate the required data given their use of multiple (and sometimes incompatible) reporting systems. In addition, as many local agencies serve families over time, with no definition of “new” being provided for review, the CSBG Network will be unable to implement this report consistently. Defining an individual or family as new becomes challenging when they may receive different services over many years (e.g. Early Head Start, child care, after school programs, youth programs, job training, WIC, food boxes, LIHEAP, etc.).
- 3. Module 3: Remove the Community Outcome Indicators that include percent or rates.** Their inclusion is inappropriate and will provide meaningless data when aggregated beyond individual initiatives. Such data has validity for geographic areas much larger in than those addressed or

targeted by local agency projects. This validity is lost when the scale is smaller and accepted data comparison points become unavailable. Having individual agencies report on rate change at the community level on social indicators does not provide information that is usable. It is more appropriate to give agencies the option of reporting outcome data and the flexibility to define which indicators they use.

4. **Module 3: Remove Collective Impact from all reports.** Collective Impact is simply one set of strategies for doing community-level work and while CSBG eligible entities are engaged in such efforts, privileging one approach given the broader range of options for doing community-level work is inappropriate and unnecessary. This should be removed and included in training and technical assistance endeavors.
5. **Module 4: Remove the Stability Indicators.** The indicators selected and included in the clearance package are not helpful or practical when reporting customers stabilized as a result of the eligible entity's work. One option duplicates data already collected and the second uses a tool that defines financial stability based on a construct the uses assumptions drawn from the general population, not low-income individuals and families specifically. Because financial well-being means something very different for the low-income population in comparison to the general population, use of the scale will produce data of limited utility.
6. **Address the unique issues of Public entities that receive CSBG.** Public agencies (sub-grantees) that sub-contract most or all of their CSBG funding to other service providers may face added challenges of requiring their grantees to collect data in accordance with ROMA Next Generation requirements since it may limit agencies to contracting with providers that have the requisite data collection capacity or require additional technical assistance to meet the reporting requirements. This challenge is not addressed in the proposed reporting package.
7. **Include a 4<sup>th</sup> ROMA Goal: Agencies Increase their capacity to achieve results.** Reinstate this national goal that addressed the critical role the network of local agencies serving 99% of US counties plays in addressing poverty. Reasons for exclusion have been inadequate to date. Because agency capacity is critical to the ultimate success of programs and services, it is important to clearly state this objective in the overall National Goals. This also highlights the broader need of the Network for ongoing training, technical assistance, and general capacity-building supports.

**Question 2: The accuracy of the agency's estimate of the burden of the proposed collection of information.**

The Partnership urges local agencies and states to estimate their time and cost burden. Based on feedback from the Network, we suspect that the current estimation is low given the increase in the amount of information required and the challenges many agencies face collecting data from multiple reporting systems. Agencies that respond to the estimation of burden question should choose one of the following options and include an explanation detailing how they arrived at the number and the impact of this collection on the agency or the state office. (Please forward your estimate to NCAF and the Partnership to assist in the estimated burden Network-wide.)

- Concerns include:
  1. The current IS survey includes 300+ data elements to report. The proposed CSBG Annual Report includes more than 1,000. This increased burden of reporting comes with no new resources.

2. The burden on local agencies is not impacted by the implementation of the Online Data Collection system (OLDC). To comply with the draft CSBG Annual Report local agencies will need to modify existing systems.
  3. Many agencies lack management information systems with the capacity to provide the required data. Data fields required for ROMA Next Generating reporting may not be mirrored in those used by agencies. In addition, many agencies use multiple (and sometimes incompatible) reporting systems which adds to the time necessary to provide the data.
- As local agencies respond to OCS, please select one of these options and describe what your local agency will need to report the requested ROMA Data:
    1. The agency's estimated time burden of 242 hours per sub-grantee (local Community Action Agency) is significantly under estimated. Based on our calculations, the burden to our local agency would be \_\_\_\_ The cost of this time burden is estimated to be \$\_\_\_\_\_
    2. The agency's estimated time burden of 242 hours per sub-grantee (local Community Action Agency) is somewhat under estimated. Based on our calculations, the burden to our local agency would be \_\_\_\_ The cost of this time burden is estimated to be \$\_\_\_\_\_
    3. The agency's estimated time burden of 242 hours per sub-grantee (local Community Action Agency) is about right for our local agency. The cost of this time burden is estimated to be \$\_\_\_\_\_
    4. The agency's estimated time burden of 242 hours per sub-grantee (local Community Action Agency) is over-estimated. Based on our calculations, the burden to our local agency would be less and would be \_\_\_\_ The cost of this time burden is estimated to be \$\_\_\_\_\_
  - In addition, it is not clear how the burden for local agencies is decreased by the online data collection system described in the by OCS. OCS' Dear Colleague Letter of June 17, 2016, states, "Aware of the reporting burden the proposed Annual Report will entail, OCS will decrease that burden by establishing an on-line automated system for use by the states and – at the discretion of the states – the local agencies, for reporting that allows in many instances auto-populating data from one year to the next and a variety of data entry processes (e.g. manual entry and automatic upload)." It is important to note, this online automated system may benefit State Lead Agencies (grantees), but will most likely not benefit local Community Action Agencies (sub-grantees). Sub-grantees will still need systems that track customers, services, outcomes, and given the requirement of many funding sources (including other federal Department of Health and Human Services funding) requires additional and sometime separate data collection systems. State grantees do not have the funding or capacity for the most part, to create systems or support local agencies to develop systems that will streamline or decrease the burden outlined here.

**Question 3: The quality, utility, and clarity of the information to be collected.**

As noted below in the detailed comments by module, several elements of data to be collected under this proposal have no meaning at the state and federal levels, and only have value, meaning, and usefulness at the local level.

- Several of the elements to be collected as described are not available in smaller geographic areas usually targeted by local agencies in their community work and if created by local agencies, lose validity. The social or population level indicators being requested are not meant for single agency reporting and are best served for community-wide scorecards or utilized as part of a community needs assessment. For example, comparing overall percentages of community indicators (e.g. the unemployment rate, violent crime rate) to individual local agencies outcomes is misleading
- Module 4, Section A: Characteristics for NEW Individuals and Households - Data Entry Form is an unnecessary document that will not produce quality data; it will have little utility at a local level; and it lends itself to meaningless data at a state and national level. It should be removed. Because demographic data alone does not include information about the needs of new customers, this information fails to help agencies determine if they are addressing issues identified in their community assessments. Furthermore, the large number of “one time” customers in programs such as LIHEAP will skew any meaningful interpretation of the data. Aside from the challenge of defining who constitutes a new customer, agencies that use multiple reporting systems will also have the added burden of tracking new customers across all programs and services.
- Module 3, Section A: Many of the indicators used here are inappropriate for reporting by local sub-grantees to States and by States to OCS and will produce data of limited utility. Several challenges underscore this point. First, community-level data on indicators is not always available at the level (e.g. regional or zip code/census tract) or population (e.g. low-income children aged 0-5) that matches the area and population targeted by the agency. Second, community-level indicators are influenced by a wide number of sources that would most likely overwhelm the impact of even successful community initiatives, a fact that significantly limits their utility for providing meaningful information about outcomes. Third, any meaningful data about the outcomes of community-level initiatives would require a rigorous program evaluation and could not be determined on the data collected through the Annual Report alone.

**Question 4: Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.**

- As noted above, OCS’ Dear Colleague Letter of June 17, 2016, states, “Aware of the reporting burden the proposed Annual Report will entail, OCS will decrease that burden by establishing an on-line automated system for use by the states and – at the discretion of the states – the local agencies, for reporting that allows in many instances auto-populating data from one year to the next and a variety of data entry processes (e.g. manual entry and automatic upload).” It is important to note, this online automated system may benefit State Lead Agencies (grantees), but will most likely not benefit local Community Action Agencies (sub-grantees). Sub-grantees (local agencies) will still need systems that track customers, services, outcomes, and given the requirement of many funding sources (including other federal Department of Health and Human

Services funding) requires additional and sometime separate data collection systems. State grantees do not have the funding or capacity for the most part, to create systems that will streamline or decrease the burden outlined here. Furthermore, new state-level systems will do little to address the needs of local agencies for improved management information systems with the capacity to collect and report the data required by ROMA Next Generation.

- OCS and the federal government provide funding to local sub-grantees that require separate systems and prohibit the aggregation of data. To minimize the burden on respondents, DHHS should examine its own practices to ensure that all DHHS-funded programs in the field can use data collection systems that can be easily integrated and “talk” to one another to produce reports that meet the needs of local agencies, states, and OCS.

### **Module 1 - State Administration: (pages 2-22)**

Module 1, Section A: (page # 3-4)

- No Comments

Module 1, Section B: (page # 5-6)

- *Question B7 Summary Analysis.* As written, this question exceeds the capacity of many state CSBG Lead Agencies (grantees). This question will require information be collected that goes beyond what is being collected through the ROMA data included in this draft annual report. The estimated time burden in the federal register did not assume this additional data collection. This is added reporting burden on State CSBG Lead Agencies because as written, the questions require the agencies to go beyond merely reporting the data and conduct sophisticated data analysis that will require additional time and may exceed the capacity of agency staff to provide meaningful information.

Module 1, Section C: (page # 7)

- No comment

Module 1, Section D: (page # 8-9)

- D2. This question is too narrow in its potential responses and decreases the capacity of the state fulfill its duties and impacts both the quality of the data collected and the utility of the data. The single metric sought is the number of entities that met all state-adopted organizational standards; this is a poor metric when used in isolation of performance at a variety of levels. No one and no agency will score 100% of anything 100% of the time. Ongoing perfection is an unreasonable expectation and is inappropriate to be used as the single reporting measure. This question should be changed to allow states to report on how many entities met 100%, 90%, 80%, 70%, 60% and less than 50% of the Standards. This will increase the performance of states by allowing them to focus their limited training and technical assistance resources on those entities not meeting multiple standards. It would also improve the quality of data as it will provide a more robust assessment of performance.
- This question needs to be re-worked in order to manage the burden of effort on states and eligible entities. The current language conveys that a Quality Improvement Plan (QIP) is the

preferred option if an eligible entity has one or more unmet organizational standards. OCS IM 138 clearly articulates the Technical Assistance Plan (TAP) is the preferred option. This section should also reference IM 138's statement that as long as an eligible entity is making progress towards meeting the standards, the state should not take action to reduce or eliminate funding.

Module 1, Section E: (page # 10-14)

- No comments

Module 1, Section F: (page # 15-16)

- No comments

Module 1, Section G: (page # 17-19)

- G3b. This question would not be able to be answered with the ROMA data being collected as proposed. This will increase the burden on states to report.

Module 1, Section H: (page # 20-21)

- No comments

Module 1, Section I: (page # 22)

- I4. This question seeks information regarding ROMA Goals. As the ROMA Goals are not listed in one module, it noted here to re-instate the current ROMA Goal: Agencies increase their capacity to achieve results. It is unfortunate there is not a module or section number that requests feedback on the data collection formatted around the set of new national ROMA goals.

## **Module 2 – Agency Expenditures, Capacity, and Resources: (pages 23-27)**

Module 2, Section A: (page # 24)

- No Comments

Module 2, Section B: (page # 25)

- 3f. No Comments

Module 2, Section C: (page # 26-27)

- No Comments

## **Module 3 – Community Level: (pages 28-50)**

Module 3, Section A: Community Level Initiatives Home Page: (page # 29)

- Remove all collective impact options from the reporting tool. The data to be reported is unnecessary for the performance of the agency. It will have no utility at the state and national levels as described currently. Collective Impact is a current “term of art” that refers to a specific

set of strategies for engaging in community-level work and it makes little sense to privilege this approach over all other options.

- Remove all rates and percentages. Reporting changes in rates of social or population indicators is inappropriate, unnecessary for proper performance of the state and federal agencies, and will not provide clarity to the impact of community-level initiatives and strategies implemented by legible entities and their partners. These elements are used in community scorecards and community needs assessments, not as an outcome indicator for an agency to a state CSBG office. Community-level indicators are influenced by a wide range of factors and even successful agency initiatives will most likely show little impact, meaning the data is of limited utility and potentially misinterpreted in negative ways. Accurate determination of the outcomes of many types of community-level initiatives requires rigorous evaluation and cannot be assessed by reporting community-level indicators alone.
- A more appropriate system may allow a local agency to report (1) the overall domain of the community initiatives (e.g. health, workforce, etc.); (2) the types of strategies employed (e.g. campaign to increase the minimum wage, EITC, etc.); (3) the target population (e.g. all at-risk high school students in a three county area); and (4) Outputs or Counts (this would allow for agencies to get credit for activities that move the initiative forward but hadn't yet resulted in outcomes).

Module 3, Section A: Community Level Initiative Status Page: (page # 30-31)

- Remove Collective Impact. See above.
- See comments later regarding Outcome Indicators

Module 3, Section A: Supplemental Data: (page # 32)

- Remove Collective Impact

Module 3, Section A: Strategies Popup Windows: (page # 33-36)

- No Comments

Module 3, Section B: Community Level NPIs: (page # 37)

- No Comments

Module 3, Section B: Community Level NPI Landing Page: (page # 37-39)

- Remove "and percent" from ALL community level indicators. Using percent is confusing and negatively impacts the quality, utility and clarity of the data and will lead to data misuse and misinterpretation. Including the "percent" has several problems. First, even though agencies are allowed to define what constitutes "community", it may be difficult for agencies to collect this data if it does not correspond to a unit or level of analysis for which there is readily available data (e.g. if community is defined as several census tracts for which the specific data in question is not available). Second, because the definition of what constitutes the community is left up to the agency, agencies may struggle to define it exactly (e.g. in the case of a broad public awareness campaign) which is unduly burdensome and may result in the collection of data with limited utility. Third, it may unfairly force a comparison between the agency's outcome and the

overall rate of a particular community level indicator. For example, a county-wide workforce development initiative may successfully create 100 jobs, but may look like (misleadingly) like a minimal result when compared with the overall county unemployment rate.

- Rates and social indicators are not appropriate for a reporting instrument from a local agency to the state office. These elements are better used in community score cards and collected as part of a needs assessment. Remove all indicators that address “Rates”, specifically:
  - Education and Cognitive Development: 5, 6, 7, 10
  - Housing: 6, 7, 8
  - Health and Social/Behavioral (2a, 2b, 2c, 2d, 2e, 3a, 3c, )
  - Public Safety (4a, 4c)

Module 3, Section B: Community Level NPI Data Entry Forms: (page # 40-50)

- This instruction is misleading and is inappropriate. It will negatively impact the capacity of the agency to perform its functions properly. Local CAAs have the ability to determine the strategies they implement in a community and to have the reporting tool state, “agencies must provide a narrative justifying....” is inappropriate.

#### **Module 4 – Individual and Family Level: (pages 51-75)**

- No Comments

Module 4, Section A: Characteristics for NEW Individuals and Households: (page # 52)

- Remove this report in its entirety. It is not necessary for the proper performance of the functions of the agency, and when rolled up to the state, the information has no practical utility. At a state level it will be misinterpreted and can be influenced by what happens in larger population centers.
- Two further points illustrate this issue. First, the Characteristics report is of little use to determine if the agency is responding to needs identified in its community assessment. Demographic data alone does not identify the needs the new customers may have and is therefore of limited utility in comparison to data about individual, family, and community needs. Second, since several core CAA programs (e.g. LIHEAP) have a large number of new customers with limited or one time contact with the agency, demographic data collected from the “low touch” services would confuse meaningful analysis of demographic trends. Third, many CAAs have to rely on data collected by their partners and grantees (in the case of public agencies), many of whom may have limited capacity to collect demographic data for new individuals and households. Fourth, there are many practical problems to identifying who constitutes a new customer or household which also constitutes an additional data collection burden on staff.

Module 4, Section B: All Characteristics Report: (page # 53-54)

- No Comments

Module 4, Section C: Individual and Family NPIs: (page # 55)

- No Comments

Module 4, Section C: Individual and Family NPI Landing Page: (page # 55-57)

- **Remove the indicator for 180 days except in cases when reporting in conjunction with the Workforce Investment and Opportunity Act (WIOA) when this time frame is required.** Local entities are not provided funding to track those receiving services for that period of time, leading to an inability to report the data. Remove it from Employment, Income and Asset Building, Housing, and Health and Social/Behavioral Development. Many of the data collection systems used by agencies also simply lack the fields or variables to track time-related data, making collection of this information burdensome at best and impossible at worst.
- **Remove the Stability Indicators.** The options available do not provide data to answer the question on the data collection form on page 67, “The following outcome indicators answer the following commonly asked question: How many people (or families) are ‘better off/lives improved’ because of CAAs work?” The first option is duplicative effort to collect the data, and does not provide meaningful information. The second option uses a survey that is not specific to families with low-incomes and is too general to provide information needed or sought. The Consumer Financial Protection Bureau’s Financial Well-Being Scale relies on assumptions and definitions about what constitutes “well-being” drawn from the general population. This will result in the collection of data of limited utility for two reasons. First, compared to what constitutes financial well-being as defined by working and middle class Americans, the large majority of agency customers will be at the lowest end of the scale, meaning there will be little variance in the data to allow for meaningful comparison. Second, what constitutes successful outcomes for most agency customers would only result in slight changes on the scale. For example, doubling savings from \$50 to \$100 a month would be represent a substantial gain for many CAA customers, but would not register on a scale that defines financial well-being based on the assumptions and experiences of the average American. In short, the scale is an inappropriate measure and will not result in the collection of useful data.

Module 4, Section C: Individual and Family NPI Data Entry Forms: (page # 56-67)

- Remove this statement from the data collection form: *Note: Tracking outcomes for 180 days is the standard that agencies are expected to work toward. The time frame of 90 days is included to allow agencies with current limited capacity to report on this time frame and to encourage quarterly review of data. The expectation is that agencies will eventually report on the 180 day indicator. These indicators would only be reported by those in a case management program or similar intensive program where appropriate (i.e. longitudinal tracking).* This sweeping statement leads the reader to believe the future expectation will be much broader than currently expected and exceeds the capacity of local agencies, and the purpose and function of many of the programs operated by local agencies. It should be edited to clearly state this is limited to Workforce Investment and Opportunity Act (WIOA) activity.

Module 4, Section D: Individual and Family Services: (page # 68-75)

- No Comments