

- The inclusion of additional NPI's, particularly those in the Family/Individual, will allow for some further expanded aggregation of data nationally on several issues/points. One thing that is causing angst in several agencies though is the amount of NPI's at family and community level that will not be reported on. We know that this is part of the selling point for this to not be extremely burdensome on some agencies, but there is a concern that if the overall report has several possible reporting areas and the agency isn't reporting in most of them, the perception will be that they are not meeting the intent of CSBG.
  - If there is no expectation that agencies will be working towards adding elements of the NPI's that they don't currently do down the road (as in, they are reporting items but also markers set out there for agencies to consider aspiring to if they match with need in the community), what is the purpose of the question/statement that asks agencies to explain why they are not doing certain things (particularly in community). That seems to go against the thought that these are just reporting items if you do them already.
- The Theory of Change is good. There were some questions around a couple of items within them.
  - One of the three goals is around individuals of low-income being involved/engaged in building opportunities in their communities.
    - There is only one item in the Principles about this, and it seems tied to the one constant that is also in the NPI, volunteering by low-income persons. With this being a top 3 overall goal, it will be important to have lots of ideas and support for agencies to broaden this beyond the "standard" items of the tri-partite board and volunteering. Organizational standards have expectations for needs assessments and strategic plans to include input from the low-income population. Could be more prominently featured in the principles or services/strategies (it is part of org standards, but you wouldn't know that looking at this one document, only in reading the standards). Example maybe could be "representative leadership", or "direct involvement" under strategies, to align with thought of low-income being an integral part of the hands-on work of planning, designing, implementing.
      - That said, the discussion guide does include language around the fact that this is a diverse group effort (uses "it takes a village"), which does go back to a point often mentioned, that identifying certain contributors as low-income might make them feel or seem more like their involvement is different, not as "professional" perhaps. Is it possible to consider something more like "incorporating the skills of community members that most understand the purpose and need for services, including those utilizing services in the community" ....or maybe shorter.
- There are some questions/concerns around the discussion of data management, both from an agency and a state perspective.
  - From the agency perspective, those with existing robust systems already in place may have the bigger burden, as they have to adjust those systems to capture new and

different things. For those with lesser to no systems, this just raises the need to invest in a system, but does possibly make it so that some would hold off on purchasing something because they know it will need to be redesigned to include ROMA Next Gen at some point. Ideas for this would be to help facilitate some collaborative projects where agencies or states could work together to build something that serves several. Planning grants for developing that collaboration would be great, or specific technical assistance from anyone with the technological know-how would also be great.

- From a state perspective, there are several states trying to figure out solutions on both the organizational standards and general reporting front. It is REALLY hard to work together, because there is no one leading this initiative. Our state is attempting to find partners for a project that could lower costs for all of us by sharing development costs. The concern really is that this ROMA Next Gen info included some language that makes it seem that there will be a Nationwide system in place in a couple of years, and that there is a chance this system would allow Community Action agencies to enter directly into the system. That would be very helpful in some ways, but it also would mean that current investments states are making to collect data may be made less effective if the vendors eventually will not be maintaining systems for collection. It would be great to develop some universal standards and expectations, maybe even some standard reports language, and encourage the collaboration of states to build systems that can feed into whatever is built, not to make the newly built systems obsolete at some point.
- The valuation for volunteer hours is substantially lower than that used in Virginia (approximately \$24 an hour). Considering the value placed on utilizing volunteers and the reporting that surrounds it, States that calculate a figure could use that amount to better represent the actual value to their State.
- We submitted other comments with our surveys, and these were just a few additional that we wanted to share. Also, several of the Community Action agencies in our state network had feedback that really represented their own experiences and concerns, therefore we did not attempt to combine all of Virginia into one feedback. You will likely receive several other detailed critiques, and we hope they will prove to be useful in completing refinements.
- It was mentioned on a recent conference call that there may be an option to talk by phone about issues. After reading these comments, we would be happy to discuss further any specifics if it would be helpful.