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## **Community Services Block Grant**

### **Dear Colleague Letter**

U.S. Department of Health and Human Services  
Administration for Children and Families  
Office of Community Services  
Division of State Assistance  
370 L'Enfant Promenade, S.W.  
Washington, D.C. 20447

<http://www.acf.hhs.gov/programs/ocs/programs/csbg>

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**Re: CSBG Model State Plan Revision: OMB Clearance and 30-Day Comment Period**      **Date: May 20, 2015**

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Dear Colleagues,

Over the last several months, the Office of Community Services (OCS), in collaboration with the Community Services Block Grant (CSBG) Network, has made significant progress in developing a new CSBG Model State Plan that is streamlined and automated, and incorporates new performance management tools, including eligible entity organizational standards and state accountability measures. Below is an update on our progress developing and moving the Model State Plan through the Paperwork Reduction Act (PRA) clearance process. This two-stage process includes a 60-day and a 30-day public comment period.

### **Model State Plan 60-Day Comment Period**

This past winter, OCS published a revised Model State Plan and sought input from the CSBG Network through a 60-day PRA comment period that ran from January 26 to March 27. (See "[CSBG Dear Colleague Letter Model State Plan Revision: Open Comment Period](#)," January 29, 2015). Concurrently, OCS requested feedback from the CSBG Network on the draft CSBG State and Federal Accountability Measures, which are partially integrated into the Model State Plan. (See "[CSBG Dear Colleague Letter: State and Federal Accountability Measures and Appendices](#)," January 28, 2015.)

By the close of the comment period, we had received a total of 21 sets of official comments through the PRA system from a broad group of states, eligible entities, state associations, and national partners. We also received numerous informal comments on both the Model State Plan and accountability measures from organizations across the CSBG Network during four webinars and at the National Association for State Community Services Programs (NASCSPP) Mid-winter Training conference in February. We thank the CSBG Network for the robust, thoughtful, and helpful response; these contributions directly impact the success of this effort.

### **Major Comments and OCS's Response**

During several weeks in April, OCS organized all the comments and carefully considered each one. The major concerns raised by the commenters included:

- reporting eligible entity serious deficiencies;

- the timeframe for state distribution of CSBG funds to eligible entities;
- submission of Federal Fiscal Year (FFY) 2016 data for the 13 states in the middle of FY 2015-2016 state plans;
- implementation of organizational standards;
- use of technical assistance plans and quality improvement plans related to organizational standards; and
- the PRA burden estimate, among others.

For a more detailed summary of major issues raised in the comments and OCS's response, please see Attachment A.

Wherever possible, OCS revised, clarified, and improved the Model State Plan and state accountability measures, based on comments. The resulting revised Model State Plan now reflects the collaborative thinking of the CSBG Network, in balance with federal oversight requirements.

### **Revised Model State Plan**

We are providing you with the revised version of the Model State Plan as a Word document (see Attachment B). While OMB may require further adjustments to the Model State Plan during the next phase of the review process, this is the proposed final content of the document. We have also included a revised version of the Draft CSBG State Accountability Measures (see Attachment C).

Please review these new versions carefully. For the Model State Plan, you may want to refer back to the previous version, published under the CSBG Dear Colleague letters dated January 29 and March 11, for comparison. While the overall structure of the Model State Plan has not changed, we made numerous revisions throughout the document based on the public comments. You will see significant changes to many sections, especially sections 7, 9, 10, and 14.

### **Office of Management and Budget (OMB) Review and 30-Day Comment Period**

Recently, OCS submitted the Model State Plan information collection request package to OMB for review, as required by the Paperwork Reduction Act. The request package included the revised Model State Plan, the comments from the CSBG Network that OCS received during the 60-day comment period, the revised burden estimate, and other information.

During this phase of the clearance process, the public may submit comments directly to OMB during a 30-day comment period, which will begin upon publication of notice in the *Federal Register*. During the comment period, comments should be sent directly to OMB, as detailed in the *Federal Register* notice.

In the coming four to eight weeks, OMB will review the information collection request package and consider additional comments submitted during the 30-day comment period. OMB will also review the automated version of the state plan on the Administration for Children and Families' (ACF) Online Data Collection (OLDC) system. Based on its analysis, OMB may request additional changes to the Model State Plan before it provides final approval for a three-year period.

### **FY 2016 State Plan Submission**

Once the Model State Plan content and automated format is approved, states may begin to use the new automated system to submit their state plans for FY 2016.

Most states have already begun developing their FY 2016 state plan submission based on the earlier version of the Model State Plan. We encourage states to continue to follow their planning processes that may be currently underway. While some of the questions in the Model State Plan have changed over the course of the clearance process, the content areas are similar. States should find the data they have developed for their state plan submission will conform to the final format, even if states have used the earlier version of the Model State Plan. In fact, in some cases, the content has become streamlined over the revision process and the final data elements will be simpler than in the previous version.

In this critical transition year, we will provide a separate technical assistance effort for the 13 states with two-year state plans covering fiscal years 2015 and 2016. In order to implement the CSBG performance management framework across all CSBG grantees in FY 2016, these states will be asked to submit basic state plan information about organizational standards, state accountability measures, and other items for FY 2016. OCS will work with the affected states to develop a one-time, modified data collection that will be as simple as possible.

### **OLDC: Technical Assistance, and Training**

In the coming weeks, OCS will provide OLDC system training and technical assistance to prepare states for using the automated Model State Plan for the first time. States will have multiple opportunities to learn about the new Model State Plan in the new format.

In the meantime, we encourage states to review their OLDC access information to ensure they have registered state staff in the correct roles for the state plan submission process. Please keep in mind:

- States should have at least one individual assigned as the Grant Administrator and one as the Authorized Official.
- The Authorized Official must be the individual (e.g., director, secretary, commissioner) who has been designated in the CSBG state designation letter, or that person's official designee.

- An individual who already has access to OLDC for another program (e.g., LIHEAP), must request CSBG be added to his/her account. (The individual will use one username and password to log-in to OLDC, and then may select from the menu of programs included in his/her account.)
- To request OLDC access for CSBG staff, or to make changes to an existing account, please use the attached form, Attachment D.

If states have questions regarding OLDC system access, please contact Niki Frazier ([nikita.frazier@acf.hhs.gov](mailto:nikita.frazier@acf.hhs.gov)). For questions on the CSBG Model State Plan and this dear colleague letter, please contact your OCS CSBG specialist. The list of OCS staff and contact information is posted on the OCS website at [www.acf.hhs.gov/programs/ocs/resource/csbg-staff-assignments-by-region](http://www.acf.hhs.gov/programs/ocs/resource/csbg-staff-assignments-by-region).

We deeply appreciate your partnership and commitment during this time of transition. Together we are ushering in a new era of accountability and effectiveness for the CSBG Network, ultimately strengthening results for the low-income people and communities we serve.

Jeannie L. Chaffin  
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