

Section 1 Designation of Lead Agency and Official State Designation Letter

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
1.1	OFFICIAL: CA Assoc., Adrienne Rolka	CA	1	1.1i. Lack of clarity. Suggestion to clarify whether you are asking for the Agency's main line or for the Authorized Official of Lead Agency's telephone number. If the latter, suggest making 1.1i. a sub-item of 1.1d.		State can choose whether to use an agency main line or other. OCS will likely communicate with the point of contact rather than authorized official. No Change to MSP.
1.1	OFFICIAL: CA Assoc., Adrienne Rolka	CA	2	1.1k. Lack of clarity. Suggestion to clarify whether you are asking for the Agency's main email address or for the Authorized Official of Lead Agency's email address. If the latter, suggest making 1.1k. a sub-item of 1.1d.		See item 1.
1.1	OFFICIAL: CA Assoc., Adrienne Rolka	CA	3	1.2b. Lack of clarity. Suggestion to provide clarity through consistent use of terminology i.e. Designated State CSBG Contact.		We are using the terms: Designated Lead Agency, Authorized Official, and Point of Contact. Using "Authorized Official" aligns with the terminology in the 424M. The statute does not use the term "Designated Official" so we are OK using "Authorized Official." Change to MSP: made changes throughout in terminology.

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MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
1.2	OCS CSBG team		4	Recommend editing 1.2 to say State CSBG "Point of" Contact and that would serve to eliminate the Instructional Note (streamlining)		Agree, but will keep instructional note for clarity. (Also see item 3.) Change to MSP: added "point of" contact
1.2	OFFICIAL: CA Assoc., Adrienne Rolka	CA	5	1.2j. Lack of clarity & unnecessary. State officials do not have websites. Suggestion to either specify you are requesting the Agency's website or remove entirely since the information is unnecessary.		agreed. Change to MSP: added clarifying terms to website fields in 1.1 and 1.2
1.3	webinar: Bill Wuestenhagen		6	The instructional note regarding Q 1.3 of the MSP appears to ask for more information in the designation letter than prior letters. I understand the need for the names and contact info of the State CSBG officials, as previously provided in the transmittal letter. Please explain why the Governor's designation letter was chosen to obtain all the state CSBG contact info. Thanks.	Designation letter	Agree the information is not necessary. Change to MSP: (p.3) revise "instructional note" to read "The letter should be from the chief executive officer of the State and include, at minimum, the designated State CSBG Lead Agency and title of the Authorized Official of the Lead Agency who is to administer the CSBG grant award."

Section 1 Designation of Lead Agency and Official State Designation Letter

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
1.3	OFFICIAL: Rita D. Gonzales-Garza, M.P.A	TX	7	<p>I will likely submit additional comments, but for now, I want to submit one that came up in the MSP Webinar held on 2/10/15.</p> <p>My comment is related to Section 1, question 1.3 regarding the State's official designation letter. I recommend that the letter only require that the chief executive officer of the State designate what department or state agency is designated to administer the Community Services Block Grant and no other information related to name of person or contact information. The letter from our State does not mention who the State Official is who will receive the CSBG grant award letter nor their contact information. This is a "historical" document that remains in place until the governor chooses to name another state agency or department. The letter also should not need to have the address and contact information of the state CSBG official. Again, that will change as time passes. The name of state official, address, contact information can be taken care of in other parts of the State plan as it is in questions in Section 1.1. Thank you for the opportunity to submit comments.</p>		See response under item 6.
1.3	OCS CSBG team		8	1.3 Recommend editing to read "Please attach the State's official CSBG designation letter..."		Agree. Change to MSP: added "CSBG"

Section 1 Designation of Lead Agency and Official State Designation Letter

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
1.3	OFFICIAL: Paul Dragon	VT	9	In addition to submitting the annual CSBG plan to OCS, our State submits a consolidated block grant plan. How does OCS anticipate the CSBG plan to be submitted as par the consolidated block grant plan? o For example, 1.3. Please attach the State's official designation letter.The letter should be from the chief executive officer of the State and include the designated State CSBG Lead Agency, the designated State CSBG Official who is to receive the CSBG grant award, the CSBG Contact Person, and complete addresses and contact information for the agency and individuals. Comment: In the past, we have included the Governor's letter, which is a blanket letter that covers all of the State's block grants administered by the Agency of Human Services, of which the CSBG Lead Agency is a division. In addition to this letter, we have included a second letter from the Agency, that specifies the State CSBG Office & Official, and then also a transmittal letter has included the CSBG Contact person and complete contact information. It seems that the requirements for the letter might be more flexible than one letter signed by the Governor.	consolidated block grant	For further review and technical assistance outside of the scope of the Model State Plan.
1.1a	OCS CSBG team		10	Recommend 1.1a Should say "Lead" Agency Name		Agree. Change to MSP: added "Lead"
1.1b	OCS CSBG team		11	Recommend 1.1b should read "Identify the cabinet or administrative department of the "Lead" Agency		Agree. Change to MSP: added "Lead"
1.1b	OFFICIAL: Tikki Brown	MN	12	What is the difference between a Human Services Department and a Social Service Department? Some State CSBG Offices are located in state Departments of Commerce, and also Economic Development or Human Rights. Should these options be listed as a specific check box? Refer to CSBG-IS, Form C, question 1 to be sure common State agency arrangements are included.		The categories under 1.1b are the exact same categories used on the CSBG-IS form C.

Section 1 Designation of Lead Agency and Official State Designation Letter

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
1.1c	OCS CSBG team		13	Recommend editing 1.1c to read CSBG Designated Official as opposed to CSBG Authorized Official to align with statutory language		See item 3. Left as "authorized" official to match with the SF-424m as this section will auto populate from the SF 424m No change to MSP.
1.1c	OFFICIAL: Tikki Brown	MN	14	refers to the CSBG Authorized Official, and Question 1.2 refers to a designated State CSBG Contact. Are these the same person? If so, use consistent language.		See item 3.
1.1d	OCS CSBG team		15	Recommend editing 1.1d to read "CSBG Designated Official" as opposed to CSBG Authorized Official		See item 3. Left as "authorized" official to match with the SF-424m as this section will auto populate from the SF 424m No change to MSP.
1.2a	OCS CSBG team		16	1.2a - "Lead" agency name		Left the same as the Point of Contact may be in a different division/office No change to MSP.
1.2b	OFFICIAL: Tikki Brown	MN	17	asks for point of contact. This is likely the same person as either 1.1c or 1.2b. This should be struck or reorganized.		We need an Authorized Official and a point of contact. This could be the same person, but not usually. No change to MSP.

Section 1
Designation of Lead Agency and Official State Designation Letter

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
	OCS CSBG team		18	1. Should there be some indication of whether the plan is for a 1 year or 2 year period? (i.e. adding a check box to indicate their selection as states still have that option)		This is on an earlier screen - States will identify this when they select what FY(s) the plan is covering

Section 2 State Legislation and Regulation

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
2.3	OFFICIAL: CA Assoc., Adrienne Rolka	CA	1	Minimize burden. Suggestion to allow State to provide a hyperlink to legislation and/or regulations as allowed in item 10.2.		Agree. Change to MSP: Add "or provide a hyperlink"

Section 3 State Plan Development and Statewide Vision and Goals

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
3.1	OFFICIAL: CAP	DC	1	<p>Section 3.1 Clarify that the State's vision and Goals must be derived from the visions developed by local eligible entities, and cannot be in opposition to the CSBG Act or the Community Action Plans developed by eligible entities. The Partnership reiterates its feedback submitted in the April 11, 2014, memo on the first draft of State/Federal Accountability Measures, comment seven that "Clarity is needed to ensure that local boards/agencies make determinations of local need and create local visions for addressing poverty. A State vision should be developed out of the local plans/visions that are submitted, not the other way around." Language should be provided that would prohibit narrowing of a CSBG vision or a narrowing of how CSBG funds are used in an individual state. CSBG is to be utilized to address issues that eligible entities have prioritized based on local community needs assessments and language included here needs to reflect such local flexibility. At times in the recent past, some states have worked to narrow the use of CSBG (e.g. programs for young children, emergency cash assistance, mental health services) and there is a concern that is left open, language about setting a statewide vision may leave the potential open for States to narrowly define how CSBG it to be utilized. If language around local control cannot be included, or if the vision cannot be derived from eligible entities, the Partnership recommends this measure be removed.</p>		<p>To address the concerns that the requirement for States to describe their "vision" and "goals" in MSP item 3.1 and accountability measure 1Sa(i) infringe on the authority of the eligible entities to develop their local plans and visions, and the concern that 3.1 and 1Sa(i) would require the State to "roll-up" all the visions of the eligible entities, we have removed the reference to "vision" entirely and clarified that the goals refer to State administration of CSBG and not to anti-poverty goals determined locally. Change to MSP: 3.2 now reads "State Plan Goals: Describe the State's CSBG-specific goals for State administration of CSBG under this State Plan." Change to State AMs: 1Sa(i) now reads, the State's CSBG State Plan "Included CSBG-specific goals and strategies for administering CSBG." In addition, a footnote describes examples of "goals."</p>

Section 3 State Plan Development and Statewide Vision and Goals

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
3.2	webinar: Jean Amison	FL	2	It appears that the performance questions in section 3 seem to take away the block grant freedom of local agencies to administer the grant and put more burden on state offices to set program goals. Is this true? Is that what is meant?		See response under #1 above.
3.2	Act. measures: CAP	DC	3	1. Measure 1Sa (i). The draft language in 1Sa (i) should clarify that the Statewide vision must be derived from the visions developed by local eligible entities, and cannot be in opposition to the CSBG Act or the Community Action Plans developed by eligible entities. The draft language asks that the State Plan include a statewide vision. The Partnership reiterates its feedback in the memo dated April 11, 2014, (memo on the draft of State/Federal Accountability Measures) comment seven that "Clarity is needed to ensure that local boards/agencies make determinations of local need and create local visions for addressing poverty. A State vision should be developed out of the local plans/visions that are submitted, not the other way around." Language should be provided that would prohibit narrowing of how CSBG funds are used in an individual state. CSBG is to be utilized to address issues that eligible entities have prioritized based on local community needs assessments and language included here needs to reflect such local flexibility. If such language cannot be included, or if the vision cannot be derived from eligible entities, the Partnership recommends this measure be removed.	Account. Meas. 1Sa(i); Endorsed: CAPLAW	See response under #1 above.
3.2	OCS CSBG Team		4	Recommends editing 3.2 to add hyperlink for term "State Accountability Measure 1Sa(i)" to definition so states can have a quick reference		Hyperlinks are included for all AMs on OLDC

Section 3 State Plan Development and Statewide Vision and Goals

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
3.2	NCAF	DC	5	<p>Section 3.2 of the model plan is “State Plan Vision and Goals: Describe the State’s vision (which encompasses the use of CSBG) and CSBG-specific goals under this State Plan. [Narrative, 2500 characters]”</p> <p>We believe that neither the statute nor the regulations of the Block Grant encourage or require a statewide “ vision” or even a unifying theme for a year’s planned CSBG activities either in the many local service areas nor statewide. To the contrary, there is a legitimate basis for a highly varied set of local uses for CSBG funds based on highly varied local circumstances.</p> <p>In addition, the term is unclear and therefore difficult to interpret and measure. Please see our related detailed comments on the performance measure 1Sa in the accompanying document regarding the State and Federal Performance Measures. We respectfully suggest that the time that will be devoted to state officials’ creative framing of a ‘vision’ is not worth the burden, just as the federal official’s time validating that a plan is visionary – or insufficiently visionary - is a poor allocation of management resources.</p> <p>Recommendation 1: As a substitute, NCAF strongly urges adopting the following requirement 3.2 “State Plan Goals: Describe the general uses of CSBG funds planned by the eligible entities and by the state [for its administrative and remainder/training and technical assistance funds.” We believe guidance regarding the format and organization of this section should be included so states know what content will be needed to be deemed complete. This also would provide federal reviewers with comparable state submissions to review.</p>	endorsed: CAPLAW	See response under CAP #1 above.

Section 3 State Plan Development and Statewide Vision and Goals

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
3.2	Account. Measures: NCAF	DC	6	<p>1Sa(i). NCAF has expressed profound concerns about the Model State Plan requirement for a state “vision” in our comments to OMB.1 [Which are reproduced in footnote 1 below]. Therefore we hope that plan and this accountability measure test whether the plan has clear and specific goals and activities without reference to visions.</p> <p>Example: an indicator consistent with the statute and regulation and amenable to uniform evaluation by federal officials reviewing the plan could be: “the state plan includes a consistent reflection of the budget and program priorities set forth by the subgrantees in consultation with the state in their budgets and plans [or: “their work plans”] and has validated that these local plans respond to the needs identified by eligible entities in their comprehensive community needs assessments.</p>	1Sa(i); related to NCAF item	See response under CAP #1 above.
3.2	Account. Measures: CAPLAW	MA	7	<p>We reiterate our comment, submitted in April 2014, that if the requirement for a statewide vision is to be included in the final guidance in measure 1Sa(i), the measure should clarify states must continue to provide local eligible entities flexibility in determining priorities for the use of CSBG funds at the local level based on their community needs assessments and community action plans.</p>	1Sa(i)	See response under CAP #1 above.

Section 3 State Plan Development and Statewide Vision and Goals

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
3.2	OFFICIAL: CAPLAW	MA	8	Section 3.2 (State plan vision and goals). We agree with NCAF's comments that a statement of state vision and goals are not required by the CSBG Act or regulations. We also agree with the Partnership's comments on this section. We reiterate our comment, submitted in April 2014, that if the requirement for a statewide vision is to be included in the final guidance in measure 1Sa(i), the measure should clarify states must continue to provide local eligible entities flexibility in determining priorities for the use of CSBG funds at the local level based on their community needs assessments and community action plans.	1Sa(i)	See response under CAP #1 above.
3.2	Account. Measures: Bill Brand	IA	9	1Sa- requires a "statewide vision with CSBG-specific goals". Iowa supports the adoption of State performance goals with the involvement of eligible entities. However, the purpose of CSBG is to support community driven, local agency determined vision, goals, and activities. A statewide vision should be no more than the sum of the vision of local agencies. Thus, requiring States to conduct the exercise of collecting, reviewing, summarizing, and synthesizing eighteen agency "visions" in Iowa into a single "statewide vision" is unproductive, and not measurable beyond a yes/no that it exists. The State Plan and State Accountability Measures should be based only on clear, measurable goals of State office performance in the administration of the grant.	1Sa(i)	See response under CAP #1 above.
3.2	Account. Measures: Tikki Brown	MN	10	Footnote 2, 1Sb. As described above in previous section [see general comments from MN], the MN OEO has its own system for measuring customer satisfaction feedback that is coordinated with our broader office efforts across all our grantees. We would like to be able to use this system instead to avoid duplication and unnecessary burden on local eligible entities.	1Sb	See response in the "General" comments section, item 92.

Section 3 State Plan Development and Statewide Vision and Goals

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3.2	OFFICIAL: Paul Dragon	VT	11	Section 3: We hope that the intent of OCS is not to put burden on the State office to set CSBG goals, or change the model of CSBG which is built on community needs assessment and community-based planning. We would expect that statewide vision and goals would remain high level.		See response under CAP #1 above.
3.3	OFFICIAL: Tikki Brown	MN	12	What is meant by State National Performance Indicators (NPIs)? Does that mean NPIs for that particular state? Or is it allowing for state additions to NPIs? Consider restating more precisely.		We mean national NPIs but also any performance indicators that may also be collected by the state. Change to MSP: clarified "State Performance Indicators and/or National Performance Indicators (NPIs)"
3.4	Account. Measures: Verna Best	NC	13	Measuring eligible entity participation in the development of the State Plan possibly should have been considered as part of the Organizational Standards as it may be more applicable to hold the State accountable to a measure that addresses opportunities made available for eligible entity participation.		The State AM 1Sb is designed to hold the state accountable for including eligible entities in the State Plan development process. The organizational standards are designed to gauge the organizational capacity of the entities.
3.4	OFFICIAL: Paul Dragon	VT	14	3.4 Eligible Entity Involvement: 3.4a asks for the State to describe specific steps to involve eligible entities in the development of the State Plan. This is straightforward and clear. The Performance Management Adjustment 3.4b speaks to the extent that the State 1) encouraged eligible entity participation and 2) to ensure the State plan reflects input from eligible entities. Are there specific sections of the State Plan that require participation or that OCS intends to see States receive and incorporate more input?		No, OCS has not identified particular sections for which the state should seek input. Training: on this question; may be clarified by ACSI survey questions as well.

Section 3 State Plan Development and Statewide Vision and Goals

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
3.3a	OCS CSBG Team		15	Recommend editing check box under 3.3a from "Eligible entity community assessments" to "Eligible entity community needs assessments" to align with statute		Agree. Change to MSP: inserted "needs"
3.3a	OFFICIAL: Jennifer Dreilbis	NE	16	3.3.a. Analysis of: Check boxes including Census, plans, community assessments, etc. This is great. It puts states in line with our expectations of grantees (eligible entities).	supportive	✓
3.3b	OCS CSBG Team		17	Recommend deletion of Federal Office of Community Services under 3.3b as OCS only provides guidance or T/A to states, not official consultation on state plan development		See item 19 below.
3.3b	OFFICIAL: Jennifer Dreilbis	NE	18	3.3.b. Consultation with: Check boxes including state partners, OCS, eligible entities, etc. Again, this is good for the state offices to review relevant populations and make sure we get their input.	supportive	✓
3.3b	OFFICIAL: Tikki Brown	MN	19	It seems odd to include national organizations and the federal Office of Community Services in the review of state plans. Consider removing.		Agree. Change to MSP: removed OCS choice.
3.4; 3.4b	OFFICIAL: MI Assoc, Kate White	MI	20	3.4 & 3.4b Included in this requirement is that the state plan and any adjustments to the state plan must reflect input from eligible entities. Recommendation for fulfilling this requirement is a written state policy that gathers this input in a timely manner, to avoid the regularly occurring practice from the state of issuing a policy guidance or requirement without first ensuring input, and having to revise the policy because of unintended consequences or practical implementation barriers that the state was not aware existed.		Yes, as a best practice, states should consult with eligible entities to determine how policy changes will impact the field. These questions and measures are designed to encourage greater and more consistent input from ees.

Section 3 State Plan Development and Statewide Vision and Goals

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
3.4a	OCS CSBG Team		21	Recommend editing 3.4a to add hyperlink to term "State Accountability Measures 1Sa(ii)" to definition		Hyperlinks are included for all AMs on OLDC
3.4a	CAP webinar: Rita Gonzales-Garza	TX	22	The State is to receive input on State Plan - is this primarily around use of funds, t/a plans. What should the focus be on what input should CAAs provide?		States could solicit input from entities on any part of the plan, which is available for public inspection. Also, see item 14 above.
3.4a	CAP webinar: Phil Cole, OH state assoc.	OH	23	If states won't work with their ""eligible entities"" or state association, what should we do?		technical assistance issue
3.4a and b	Account. Measures: NCAF	DC	24	1Saii, 1Sbi and ii are all excellent additions which will strengthen the delivery of the program by promoting collaborative planning and coordination regarding to the future CSBG program.	1Sa(ii) and 1Sb; supportive	√
3.4b	webinar: Rita Gonzales-Garza	TX	25	On 3.4b, what type of input are you anticipating would be provided by eligible entities, would it be related to things such as the allocation formula, use of discretionary funds, etc.? Seems a bit more difficult to get input because in the past we had an actual State Plan document to present and now it will be automated.	cross reference to general comments on OLDC: sharable State Plan version	Yes, the State might consult on all of these issues. The State's consultation process will be the same under the new MSP. The new MSP will be available in a shareable format for this consultation process. No change to MSP. Training issue: consultation process.
3.4b	OFFICIAL: Jennifer Dreilbis	NE	26	3.4.b. After year one, show how the state took the analysis and feedback on 3.3.a and 3.3.b. and made changes. This is a great question to keep states accountable to not only getting the information but using it in its next application and plan.	supportive	√

Section 3 State Plan Development and Statewide Vision and Goals

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
3.4b	OFFICIAL: September Ward	MI	27	What will be gained by checking boxes of what was used to develop the plan. Seems that it would take some time to figure this out. Is it worth the burden?		Training or technical assistance issue.
3.4b	OFFICIAL: CA Assoc., Adrienne Rolka	CA	28	3.4b. Lack of clarity. Suggestion 1: Specify “the State’s analysis of past performance in these areas” as the State’s analysis of past performance as measured by the differences between past CSBG Annual Reports and their corresponding CSBG State Plans.		This comment (along with comment below) are the only comments that the instructions are not clear. We would like to provide flexibility for states to analyse feedback from more than the sources suggested by the commenter.
3.4b	OFFICIAL: CA Assoc., Adrienne Rolka	CA	29	3.4b. Lack of clarity. Suggestion 2: Specify “feedback from eligible entities, OCS, and other sources” as feedback provided by eligible entities through the annual ACSI survey, and by OCS through the annual State-specific reports on accountability measures. This suggestion applies to all items throughout the MSP that refer to the language state above.		See comment 28.

Section 4 CSBG Hearing Requirements

MSP	COMMENT	STATE	#	COMMENT	RELATES TO	RESPONSE
4	OFFICIAL: Paul Dragon	VT	1	Sections 4 and 5 are straightforward and clear.	supportive	√
4.1	OCS CSBG Team		2	Recommend editing 4.1 to add "...as required under Section 676(e)(2) and 676(a)(2)(B) of the Act."		4.1 is only referring to the Public Inspection, and not legislative. Section 676(e)(2) is referenced in 4.3
4.2	OFFICIAL: CA Assoc., Adrienne Rolka	CA	3	4.1. Redundant and unnecessary. The State's answer to the second part of 4.2, wherein the State describes how they ensured state wide distribution of notice of the hearing(s) to allow the public to comment on the State plan, answers 4.1 which asks how the State made the State Plan available for public inspection.		Clarified the headings and questions. Change to MSP: changed heading of 4.1 to "Public Inspection" and added the heading "Public and Legislative Hearings" to 4.3. Also, added "on the State plan" to the question 4.2 for clarity.
4.2	OFFICIAL: CA Assoc., Adrienne Rolka	CA	4	4.2. Lack of reference. Suggestion to reference where this item is required under the CSBG Act i.e. 676(a)(2)(B)		References are in 4.3; no change to MSP.
4.2	OFFICIAL: CA Assoc., Adrienne Rolka	CA	5	4.4. Minimize burden. Suggestion to allow State to provide a hyperlink to hearing documentation as allowed in item 10.2.		Change to MSP: added in choice to reference by hyperlink.
4.3	OCS CSBG Team		6	Recommend editing 4.3 to add a narrative box for explanation request (as to why the State has not held a public hearing) or ability to attach documentation for such explanation		Working on adding an additional column for explanation outside of supporting documentation

Section 4 CSBG Hearing Requirements

MSP	COMMENT	STATE	#	COMMENT	RELATES TO	RESPONSE
4.3	OFFICIAL: MI Assoc, Kate White	MI	7	4.3 The state is required to ensure that public notice and hearing are conducted with “sufficient time and statewide distribution.” Recommend CAPS provide guidance on what is “sufficient time” and that standard become the written policy for the state to follow, and use to document this requirement is met.		OCS does not see a need for a prescribed standard and would like to leave some flexibility here. No change to the MSP.
4.4	OFFICIAL: Tikki Brown	MN	8	Links to state legislative hearing agendas are now often available. Add "or a link" to "attach a document".		agree. See item 5.
Gen	webinar: Rita Gonzales- Garza	TX	9	On Section 4 legislative hearing requirements, can we find out more information related to what is expected? If the State Agency's budget is heard at a legislative hearing in the House of Representatives and in the Senate and CSBG is part of the budget presented, would this meet the requirement for legislative hearing?	legislative hearing process	This is a programmatic question. No change to the MSP. Training: legislative hearing requirements
Gen	OCS CSBG Team		10	Note: As part of review, CSBG Program Office would likely require further explanation by state if it indicates that it has hosted a “combined” hearing. It might streamline to timeline to receive this information up front as opposed to asking for it after submission.		Working on adding an additional column to the Table in 4.3 for explanation outside of supporting documentation

Section 5 CSBG Eligible Entities

MSP	COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
5	OFFICIAL: September Ward	MI	1	Where do we upload a map of the CAAs in the State of Michigan?		We are not currently envisioning this type of information in the state plan.
5.1	webinar: Rita Gonzales- Garza	TX	2	Can a definition be provided for "limited purpose agency" for question 5.1		Yes. Change to MSP: add the NASCSP definition for LPA, modified by CAPLAW.
5.1	webinar: Verna Best	NC	3	Private comment: Please ask Seth to contact NC (Verna) post-call for a discussion on the statement LPAs are grandfathered in...his comments may have been general but there is a discussion needed on this statement and the impact in NC. You do not need to read this question "on the air." thanks.		NC LPAs are funded with state discretionary funds, and not, therefore, subject to designation/de-designation requirements.
5.1	OFFICIAL: Annette Marchese	NY	4	1. Section 5, Item 5.1 In the third column where you choose the Type of Agency, this list should include Local Governments.		Agreed. Change to MSP: added "Local Government Agency (not a Community Action Agency)"
5.1	OFFICIAL: James Leary	NY	5	I am writing to suggest that the "Type of Agency" categories within the Table provided in Section 5.1 of the draft State Application and Plan include a category for "public organization" or "political subdivision of the State," as this phrasing is used in the CSBG Act to describe public agencies that have been designated as eligible entities (see 42 USC sections 9909[c] and 9910[b]).		See item 3 above. We are not using the "political subdivision" language, but adding "local government agency," which aligns with IS survey language.
5.1	OFFICIAL: Barbara Mooney	PA	6	[Barbara proposes adding in two questions on counties served by CSBG from section B of the CSBG IS report.]		OCS will consider using these questions in the annual report.

Section 5 CSBG Eligible Entities

MSP	COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
5.1	OFFICIAL: Tikki Brown	MN	7	Reword "Tribe" to "Tribal Government" to appropriately recognize the sovereign government status.		Change to MSP: changed to "Tribe or Tribal Organization"
5.1; 5.3	OFFICIAL: MI Assoc, Kate White	MI	8	5.1 & 5.3 Who is listed as an "eligible entity" in the annual state plan is of great concern to the CAP network. The provisions requiring the state to ensure eligible entity input (Sections 3.4b, 7.6; 7.12; 8.3; 9.4; 9.6; and 10.14) should be modified, where most appropriate, to ensure this proposed eligible entities list by the state is distributed timely and widely. Also the rationale for any change noted in 5.3, should be specifically addressed in the relevant "plan adjustment" section (see comments below.)		Ees will be able to voice concerns during state's hearing process and in performance feedback through the ACSI survey.
title	OCS CSBG Team		9	Recommend editing Title of Section and 5.1 to be "CSBG Entities," as all entities funded by CSBG dollars are not considered "eligible entities" as per the statute, meaning at minimum they have a tripartite board.		This section is designed to capture all eligible entities funded by CSBG 90 percent funds. May need to discuss?

Section 6 Organizational Standards

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
6	Account. Measures: Bill Brand	IA	1	<p>6S- requires States to monitor for compliance with the Organizational Standards every year for every eligible entity. This requirement was a surprise to Iowa when it appeared in the draft IM, as it is counter to the requirements for triennial monitoring in the CSBG Act. This major new administrative burden on States will place significant strain on state capacity and resources. Iowa is stretched to the brink with current monitoring and other responsibilities, limited further by state legislative action that allows only 4% of the grant for administrative purposes. The options to use a third party review or self- or peer-assessments are unworkable in Iowa. Iowa does not have funds for contracting for third party services. Further, States would need to review the third party assessment, self-assessments and peer assessments, taking time away from providing effective monitoring, on-site reviews, TTA, and other responsibilities required by the Act. Moreover, when taken to the next natural extensions, if States are required to follow up a self-assessment or peer-assessment with informal technical assistance, technical assistance plans, or quality improvement plans, and monitor progress on compliance with those plans, provide additional follow up to ensure that deficiencies have been corrected, etc., state capacity will be inadequate to satisfactorily perform these functions for all agencies on an annual basis. Should OCS move forward this requirement, OCS should allow States maximum flexibility in meeting the standard, based on individual State capacity, resources, and organizational structure. This could include monitoring compliance through sampling, use of a risk matrix, focusing on limited key priority Organizational Standards, or other methodologies developed by States consistent with the Block Grant.</p>	Annual assessment	<p>Several commenters were concerned with the administrative burden and cost associated with the requirement to "monitor" or assess eligible entities against the new CSBG organizational standards every year, as indicated in section 6 of the MSP and associated accountability measure 6S. OCS believes assessing the standards each year is critical to the effectiveness of the standards. In addition, OCS has the authority to impose this requirement (see IM 138). However, OCS has provided maximum flexibility in how States choose to assess standards, as described in IM 138. OCS has funded, and will continue to fund, extensive T/TA efforts to assist states in implementing an annual assessment process. No change to 6S or the MSP.</p>

Section 6 Organizational Standards

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
6	Account. Measures: Tikki Brown	MN	2	We appreciate the improvements to this section from the previous iteration. Still, monitoring against the Organizational Standards every year for every eligible entity is not parallel to the three year window for monitoring allowed in the CSBG Act. This places a significant strain on our State capacity. We do not believe the current 5% administrative funding provided to MN will allow us to acheive what has been proposed. Further we think it is arbitrary and inappropriate for OCS to assign a one-year limit to technical assistance plans (TAP). The appropriate length of time for a TAP should be negotiated by the State adn the local eligible entity based on what needs to occur. Remove the clause "that could be resolved in one year" on 6Sb(i).	6Sa, 6Sb	See item 1 above. In addition, see item 15 in Section 8 for the change in 6Sb(i).
6	Account. Measures: Verna Best	NC	3	Monitoring the implementation status of the Organizational Standards each year for all eligible entities may significantly challenge states' administrative capacity. Consider aligning frequency with CSBG federal legislation section 678B MONITORING ELIGIBLE ENTITIES.	Annual assessment	See item 1 above.
6	CAP webinar: Ditzah Wooden-Wade	MA	4	Comment: A major concern around completing organizational standards on an annual basis for all CAAs to report out on a point in time.	Annual assessment	See item 1 above.

Section 6 Organizational Standards

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
6	OFFICIAL: Bill Brand	IA	5	<p>Iowa emphasizes comments we submitted in regard to the draft State and Federal Accountability Measures regarding the requirement for States to monitor for compliance with the Organizational Standards every year for every eligible entity. This requirement is counter to the requirements for triennial monitoring in the CSBG Act and represents a major new administrative burden on States that will place significant strain on state capacity and resources. Iowa is stretched to the brink with current monitoring and other responsibilities, limited further by state legislative action that allows only 4% of the grant for administrative purposes. The options to use a third party review or self- or peer-assessments are unworkable in Iowa. Iowa does not have funds for contracting for third party services. Further, States would need to review the third party assessment, self-assessments and peer assessments, taking time away from providing effective monitoring, on-site reviews, TTA, and other responsibilities required by the Act. Moreover, when taken to the next natural extensions, if States are required to follow up a self-assessment or peer-assessment with informal technical assistance, technical assistance plans, or quality improvement plans, and monitor progress on compliance with those plans, provide additional follow up to ensure that deficiencies have been corrected, etc., state capacity will be inadequate to satisfactorily perform these functions for all agencies on an annual basis. Should OCS move forward this requirement, OCS should allow States maximum flexibility in meeting the standard, based on individual State capacity, resources, and organizational structure. This could include monitoring compliance through sampling, use of a risk matrix, focusing on limited key priority Organizational Standards, or other methodologies developed by States consistent with the Block Grant.</p>	Annual assessment	See item 1 above.

Section 6 Organizational Standards

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
6	OFFICIAL: Ditzah Wooden-Wade	MA	6	The State CSBG Office would be responsible for assuring grantee monitoring of 58 organizational standards amongst 24 CAAs on an annual basis We are currently not adequately staffed to support verification reviews, monitoring and T &TA on an annual cycle for organizational standards in addition to the planned triennial monitoring assessment processes. Our triennial monitoring assessments combine compliance reviews with best practice reviews (Northeast Institute for Quality Community Action - NIQCA) to create an integrated comprehensive monitoring report. Reporting on the performance measures for organizational standards within the context of a triennial process for "planned" CAAs is doable. However Massachusetts does not have adequate staffing to support reporting out on both the organizational standards & the triennial monitoring for the entire CAA network.	Annual assessment	See item 1 above.
6	OFFICIAL: Ditzah Wooden-Wade	MA	7	Additional funds directed to IT may need to be ear-marked to accommodate for the proposed collection of supporting document information. The State office does not have the capacity to maintain the supporting documents to validate the State's requirement for organizational Standards (section 6 of Model State Plan) annually for 24 CAAs.	Annual assessment / burden	See item 1 above.

Section 6 Organizational Standards

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
6.1	OFFICIAL: CAP	DC	8	Section 6.1. Add a reference that Section 6.5 provides for modifications to the COE-Developed Standards or consider adding an additional option for States to select an option that will allow them to use the COE Developed Standards but with modifications and supporting documentation. In addition to using an alternative set of Standards, Information Memorandum (IM) 138 provides for states to modify the COE-Developed Standards as stated by “whether the State is using the COE-developed organizational standards (and any modifications, if applicable)”. While the model State Plan addressed this in section 6.5, a reference or moving this to 6.1 may decrease confusion.	Endorsed: NCAF	Agree, these questions are closely associated. Change to MSP: Moved up the previous question 6.5 to new 6.2 to be right after 6.1.
6.1	NCAF	DC	9	Section 6.1. Add a reference to 6.5 or combine the items so that there is clearly an option for States to use the COE Developed Standards but with modifications with submission of supporting documentation.	same as CAP	See CAP item 8.
6.1	OFFICIAL: CA Assoc., Adrienne Rolka	CA	10	6.1. Lack of clarity. To ask for States to “provide evidence that the standards are at least as rigorous as the COE-developed standards” seems like an ambiguous and unreasonable request. What constitutes acceptable evidence? Is there even “evidence” out their measuring rigor? Suggestion to have States justify (i.e. describe) how their alternative standards are at least as rigorous as the COE-developed standards.		Change to MSP: change wording of "provide evidence that" to "describe how"
6.2	OFFICIAL: CAPLAW	MA	11	Section 6.2 (Adoption of organizational standards). This section should ask whether the state adopted CSBG organizational standards for eligible entities in a manner that complied with state administrative law, such as the state’s administrative procedures act.		Change to MSP: added "in a manner consistent with the State’s administrative procedures act" to the question.

Section 6 Organizational Standards

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
6.3	OFFICIAL: CAP	DC	12	Section 6.3. Clarify that a State-authorized third party may assess and validate the assessment of the organizational standards. IM 138 provides examples referencing a state-authorized third party and for clarity, it would be helpful to add that or note that is included in the definition of "state validation".	Endorsed: NSCSP	Agree. Change to MSP: added "with validation by the State or State-authorized third party" to the parenthetical under choices for peer-to-peer review and self-assessment. Also, added a stand alone choice for "state-authorized third party validation"
6.3	NCAF	DC	13	Section 6.3. Clarify that a State-authorized third party may assess and validate the assessment of the organizational standards.	same as CAP	See CAP item 12.

Section 6 Organizational Standards

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
6.3	OFFICIAL: NASCSP	DC	14	<p>Monitoring against the Organizational Standards every year for every eligible entity will place a significant strain on state capacity. Even with the option to use a third party in reviews, it can be difficult to secure a contract and funding for third party verification. States are still required to review the self-assessments and peer assessments and this takes time away from providing quality on-site reviews and follow-up. This also places a burden on state capacity and funding.</p> <p>If States are required to follow up a self-assessment or peer-assessment with informal technical assistance, technical assistance plans, or quality improvement plans, and subsequently monitor progress on compliance with those plans, i.e. provide additional follow up to ensure that deficiencies have been corrected, state capacity will be inadequate to satisfactorily perform the functions for all agencies annually, or other state responsibilities will not be fulfilled. Section 6.3 requires States to identify how they will assess agencies against the standards (peer or self-assessment, etc.). Section 10.4 requires States to describe their procedures for addressing deficiencies. Unless or until OCS modifies the requirement for annual assessment of the Organizational Standards for all agencies, OCS should allow States maximum flexibility in responding to these issues based on individual State capacity, resources, and organizational structure.</p>	Annual assessment	See item 1 above.
6.3	OFFICIAL: NASCSP	DC	15	Same as CAP comment on definition of "state validation."	same as CAP	See CAP item 12.
6.3	OFFICIAL: Ditzah Wooden-Wade	MA	16	The use of a 3rd party reviewer does not mitigate the fact that the State must still perform follow-up site-reviews, and will bring into question the quality of such reviews and follow-up.	Annual assessment	See item 1 above.

Section 6 Organizational Standards

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
6.3	OFFICIAL: CA Assoc., Adrienne Rolka	CA	17	6.3. Inconsistent. Suggestion 1: To align 6.3 with IM 138 by asking States how they plan to annually assess eligible entities against the organizational standards. Suggestion 2: Keep language consistent with IM 138 by having parentheses state "with State or third party validation."		Agree to stay consistent with the IM. Change to MSP: Added "as described in IM 138."

Section 6 Organizational Standards

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
6.4	OFFICIAL: CAP	DC	18	<p>Section 6.4. Replace the term “corrective action” with improvement or Training and Technical Assistance. The term corrective action is tied to a Quality Improvement Plan in IM 116 and carries serious connotations. IM 138 appears to provide for Technical Assistance Plans (TAPs) for eligible entities not meeting Standards, and using terms related to T/TA in 6.4 would be more appropriate and less confusing than the term corrective action.</p>	Endorsed: NSCSP	<p>Several commenters asked for clarification or revision of the terminology in question 6.4 (“briefly describe procedures for corrective action” based on standards). Based on our review of MSP section 6 on organizational standards, section 10 on monitoring, and the accountability measures on organizational standards and monitoring, we determined that the question did not add anything and could be deleted. States will follow regular/statutory corrective action procedures if an eligible entity fails to meet organizational standards. The state will describe these procedures in section 10 of the MSP. Change to MSP: Removed question 6.4</p>

Section 6 Organizational Standards

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
6.4	OCS CSBG Team		19	Recommend 6.4 reference IM 138 as a hyperlink for the term “corrective action.” The term has connections to the monitoring process as outline in Section 678(c) of the statute. There may be a need for more clarity.		Instructional note added, but will link to "organizational standards" Was an additional pop-up box needed for Section 678(c)?
6.4	NCAF	DC	20	Section 6.4 Invite or require States to provide supporting documentation	same as CAP ?	See CAP item 18.
6.4	OFFICIAL: NASCSP	DC	21	OCS should also consider clarifying the difference between Technical Assistance Plans (TAPs) and Quality Improvement Plans (QIPs). QIPs should be reserved for more challenging corrections that can be made with adequate time OR urgent situations that must be prioritized and addressed quickly. States should also be allowed flexibility to determine when a TAP is necessary. OCS may consider clarifying the process from moving from a TAP to a QIP.		See Section 8, item 15.
6.4	OFFICIAL: NASCSP	DC	22	Same as CAP comment on use of term "corrective action."	same as CAP	See CAP item 18.
6.4	OFFICIAL: September Ward	MI	23	This question seems more applicable during the 2nd year of this new plan.		See CAP item 18.
6.4	OFFICIAL: CA Assoc., Adrienne Rolka	CA	24	6.4. Lack of clarity. Unclear what “corrective action based on organizational standards” means. Based on what about the organizational standards? Suggestion to align wording with IM 138 and to request States describe procedures for corrective action if a State finds an eligible entity is not meeting a standard or set of standards (IM 138 p.5). Also, suggestion to minimize burden to States by allowing them the option to attach a document.		See CAP item 18.

Section 6 Organizational Standards

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
6.5	OFFICIAL: CAP	DC	25	Section 6.5. See comments for Section 6.1 above. To have this option separate from the selection in 6.1 seems confusing. Either merge the sections or make reference in 6.1 that this option is provided below.	Endorsed: NCAF	See CAP item 8.
6.5	OCS CSBG Team		26	Recommend reference to IM 138 in 6.5 be hyperlinked to IM 138.		Will check with OIS to see if we can hyperlink to outside sites
6.5	NCAF	DC	27	Section 6.5. See NCAF comments for Section 6.1 (item #14)	same as CAP	See CAP item 8.
6.5	OFFICIAL: Barbara Mooney	PA	28	This section should be moved up to 6.1. Choices: use COE standards, use other sandards AND this one: modify. It makes sense to keep these together, not separated by other questions.		See CAP item 8.
6.5	OFFICIAL: Tikki Brown	MN	29	Define "slightly" or remove.		Change to MSP: removed word "slightly"; changed wording to align with IM 138 language.
6.6	OFFICIAL: CAP	DC	30	Section 6.6. Insert check boxes for the specific exceptions noted in IM 138 to increase ease of use and clarity. IM 138 lists a number of exceptions a State may make in applying the organizational standards for eligible entities due to special circumstances or organizational characteristics such as small budget size, small CSBG allocation, State-funded Tribal entity, and Limited Purpose Agency. To ensure the quality of data collected, it is recommended that 6.6 should list "check boxes" for these categories. 6.6a should remain to allow the State to provide additional detail.	Endorsed: NSCSP, NCAF	OCS does not want to encourage states to submit exceptions. In addition, OCS does not have a set expectation around what exceptions are allowed. The examples included in the IM are not comprehensive. No change to MSP.
6.6	NCAF	DC	31	Section 6.6 add the list of excluded organizations.	same as CAP	See CAP item 30.
6.6	OFFICIAL: NASCSP	DC	32	Same as CAP comment on use of check boxes.	same as CAP	See CAP item 30.

Section 6 Organizational Standards

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
6.6	OFFICIAL: CA Assoc., Adrienne Rolka	CA	33	6.6a. Minimize burden. Suggestion to allow State the option to attach a document.		OK. Change to MSP: provided technical instruction to allow State to attach document.
6.7	webinar: CAP, Denise Harlow	DC	34	Not sure why 6.7 is skipped in the first year? Wouldn't states set a target from the first year onward?		The first year collecting data is developmental. Setting a target without any initial data would not be meaningful. No change to MSP.
6.7	OFFICIAL: CAP	DC	35	Section 6.7. Insert additional language to read "What percentage of assessed eligible entities in the State does the State expect will meet (insert ALL or 100% of) the State-adopted organizational standards in the next year. IM 138 conveys the need for all eligible entities to meet all of the state established standards, so reiterating this in the Model State Plan would add clarity.		OCS agrees with several commenters who suggested MSP question 6.7 and the associated AM 6Sa should clarify that the eligible entities must meet all or 100% of the standards. Change to MSP: Inserted the word "all" into MSP question 6.7 and AM 6Sa.

Section 6 Organizational Standards

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
6.7	Acct. Measures: CAP	DC	36	Measure 6Sa. The draft language in 6Sa should clarify that 100% of the organizational standards need to be met for an eligible entity to be found in compliance. The draft language refers to "x" percent of assessed eligible entities meeting State-adopted organizational standards. As noted in the March 22, 2015 Partnership memo providing feedback on the CSBG Model State Plan, inserting additional language to read "x percentage of assessed eligible entities in the State met (insert ALL or 100% of) the State-adopted organizational standards". IM 138 conveys the need for all eligible entities to meet all of the state established standards, so reiterating this in the Model State Plan would add clarity.	6Sa	See CAP item 35.
6.7	OFFICIAL: Jennifer Dreilbis	NE	37	6.7- What percentage of assessed eligible entities in the State does the state expect will meet the state adopted organizational standards in the next year This is a good question because it makes states think ahead and holds us accountable to our training and technical assistance plan to bring them into compliance.	supportive	√
6.7	OFFICIAL: Barbara Mooney	PA	38	[Barbara suggests inserting "100%" in the question.] This is the intention of this section, yes? Should be explicitly stated.		See CAP item 35.
6.7	OFFICIAL: Tikki Brown	MN	39	Monitoring against the Organizational Standards every year for every eligible entity is not feasible at current administrative levels (i.e. 5%), and contradicts the federal CSBG Act's allowance for state monitoring every three years. This question should be removed.		See item 1 above.
6.1?	OCS CSBG Team		40	What type of evidence will be accepted? (Narrative? Hyperlinks to documents? Word document?) Need to be able to describe this to states.		Assuming that this is in reference to 6.1 - supporting documentation will be included as an attachment - language updated in MSP

Section 6 Organizational Standards

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
6.4 10.5	NCAF	DC	41	See NCAF comment under Section 10.		see item in section 10.
Gen	OFFICIAL: CA Assoc., Adrienne Rolka	CA	42	General comment: This section seems out of order in that the Organizational Standards are a part of the State's administrative duties i.e. monitoring. There is no apparent logic to the section's current placement. Suggestion to either place Section 6 within Section 10: Fiscal Controls and Monitoring or, if wanting to keep as a separate section, place Section 6 before Section 13: ROMA, because of the nature of Organizational Standards (i.e. performance) being similar to ROMA.		We have arranged the sections in what we thought would be a logical order in terms of how a State might develop a state plan. However, each section can be accessed individually and in any order. We have also revised this section (e.g. removed MSP item 6.4) to address duplication with section 10. No change to MSP.

Section 7 State Use of Funds

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
2	OCS CSBG Team		1	Recommend adding a 7.2 - "Does the State intend to use more than the minimum of 90 percent funds? Yes or No		let's discuss.
2	OFFICIAL: Jennifer Dreilbis	NE	2	7.2. Amount or percentage of funds to the eligible entities Listing the percentage is a plus to allow for states that have a base plus formula model and will not know the exact amounts until receipt of the award letter. However, the states with a base plus formula model would know the percentage each entity receives.	supportive	√
2	OFFICIAL: Patricia Swartz	NJ	3	Recommend adding the word "expected" to funding amount		The question and table headings make clear that these are "planned" amounts. No change to the MSP.
2, 10	OFFICIAL: Paul Dragon	VT	4	7.2 Planned Allocation and 7.10 Remainder/Discretionary Funds: It is helpful to be able to use planned percentages, in particular for the use of remainder/discretionary funds. It is in part the flexibility of the remainder/discretionary funds which can be critical to their success. Remainder/discretionary funds can meet urgent/unforeseen needs or emerging opportunity during the planned period. While we may award discretionary funds during the calendar year, the grant period and expenditure of funds may be straddle multiple years. In the past, our State has submitted an annual plan. It is not clear how we would manage these circumstances in the table or what is meant by "use".		This comment is for MSP 7.10 (out of order). States may choose to use percentage or dollar amounts in the table under 7.10 (now 7.9 in the revised draft). This is just a plan for use of funds. At the end of the performance period, the State may describe how the funds were actually used in the annual report.

Section 7 State Use of Funds

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
3	OFFICIAL: CA Assoc., Adrienne Rolka	CA	5	7.3 Lack of clarity. Unclear what is meant by "contracting mechanism". Suggestion to define or describe OCS's definition of a contracting mechanism or give an example.		Change to MSP: for clarity removed word "contracting" and re-worded sentence to read "Describe the mechanism (e.g., contracts)..."
5	webinar: Jeniffer Dreilbis	NE	6	What does OCS consider State Authority or do we determine as the state?		"State authority" is dictated by State law and practice. Change to MSP: revise 7.4 to add "(such as approval by a board or commission)": "Must the State get State legislative...or other types of administrative approval (such as approval by a board or commission) before...". Also, remove "If yes, please describe," as that is duplicative of 7.4b. In 7.4b add "If yes was selected above...". Also, tweak the numeral range under 7.4a to be 3 digits. Finally, in 7.5, add "as described under 7.4, to read "After getting State authority, as described under 7.4...."
5	webinar: September Ward	MI	7	What is the Federal authority that will provide funds?	account measure 2Sa	We will consider adding a definition and provide technical assistance for this question.

Section 7 State Use of Funds

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
5	webinar: Jean Amison	FL	8	The 30 day requirement to distribute the funds seems like it will cause MUCH confusion and lots more work on states and eligible entities. If states are required to distribute funds within 30 days, the allocations from the feds come in quarterly. Does this mean states will have to provide increases to established contracts each time a new allocation is received from HHS? Our state would not be able to do continual modifications to the grants. Please elaborate on this requirement.		See item NCAF 18.
5	webinar: Ditzah Wooden- Wade	MA	9	What does OCS consider State Authority or do we determine as the state?		See item 8 and NCAF 18.
5	webinar: Jessica Rochester	MN	10	More specifically I am asking for the 30 day payment standard. We don't meet it if its first approval. If its when signed then we would make the 30 day even if the process took more than 45 days.		See item NCAF 18.
5	Act Measures: CAP	DC	11	Measure 2Sa. Remove "state authority" from the measure.	Account. Measure 2Sa	See item NCAF 18.

Section 7 State Use of Funds

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
5	NASCSP	DC	12	<p>Section 7.5, Distribution Timeframe after State Authority: Section 7.5 and Measure 2Sa are contradictory, and the distribution timeframe would hurt state capacity. The state plan allows a state to report how many days it expects to take to make funds available to eligible entities after receipt of authority. There is a note that it directly correlates to the State Accountability Measure 2Sa. However, Measure 2Sa requires that in order to meet the standard, States must make funding available to eligible entities within 30 days after state authority. This is not only contradictory between the two, but not allowing States the flexibility to choose when to make the funding available may severely cripple funding mechanism because the federal allocation is only provided quarterly. Should States be required to make the funding available within 30 days of receiving state authority, staff may face sending out modifications every quarter, which is time consuming and non-productive for States and agencies, and would severely impact current and timely distribution of funds.</p>	2sa	See item NCAF 18.
5	OFFICIAL: Jennifer Dreilbis	NE	13	Nebraska would request more clarification on definition of State Authority.	2Sa	See item 6 and NCAF 18.
5	OFFICIAL: Jennifer Dreilbis	NE	14	This is a great question. It holds states accountable and helps us think through our processes to determine if we can streamline them to meet expected deadlines (laid out in State Accountability Measures of 30 calendar days).	supportive	√

Section 7 State Use of Funds

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
5	Account Measures: Bill Brand	IA	15	<p>2Sa- requires a 30 day deadline for making funds available to local entities. This becomes counterproductive in the all-too-often cases of federal continuing resolutions, unpredictable funding schedules, and multiple federal funding releases that occur in a short time span. An example is when OCS made two funding awards within 24 days in Dec-Jan, the first of which was a very small award. Many states, including Iowa, waited to issue the two awards simultaneously. This reduced administrative burdens, contract amendments, and related costs for both the State office and local agencies, with no negative impact on local agencies. States should have the flexibility to conduct business in such a manner that serves the best interests of all parties.</p>	2Sa	See item NCAF 18.

Section 7 State Use of Funds

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
5	Account Measures: Tikki Brown	IA	16	<p>2Sa. We appreciate the efforts made to date to improve this measure from its original wording. We agree with the spirit of the measure, but still have concerns over the language. For example, OCS recently released Q2 FY15 CSBG funds in an initial very small award, followed quickly by the remaining quarterly award. We use "Notice of Funds Available" process to release federal funds. With the first, small Q2 release of FY15 funds, we decided to hold the funds until the subsequent release of the remaining Q2 FY 15 funds. Technically this would not have met the measure 2Sa. Following this accountabilty measure in this specific instance would hav ewould have increased our state administrative costs without any benefit to eligible entities, something we strive hard to avoid. We suggest adding some qualifying phrase such as "when appropriate" to this measure to account for such situations.</p>	2Sa	See item NCAF 18.

Section 7 State Use of Funds

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
5	OFFICIAL: September Ward	MI	17	<p>Our grants need to be approved by our State Ad Board before the 90% can be issued into contract. Our state uses a contract that covers 3 to 5 years. The CSBG allocation projection in the first year of the contract is sent to the State Ad Board for approval of each fiscal year of the contract. For 7.4 we would answer yes. For 7.5 we are not sure how to answer this question. Example: FY2016 is the start of our contracts. We get approval from our State Board in June 2015 for FY16, FY17, and FY18. The approval is early because of our early submission to State Ad Board.</p> <p>For 7.5 answers for FY16, FY17, and FY18 using June 2015 approval by State Ad Board: In FY2016 we should answer 90 days (typically we get the annual spending authority out in September (Note approval in June which is 90 days before the start of the fiscal year); In FY2017 we should answer 455 days (Note our approval was in June 2015); In FY2018 we should answer 510 days (Note our approval was in June 2015)</p> <p>The State Model is keying off the State authority approval date rather than the states approval of the CAAs application for funds. The State reviews the CAAs applications on an annual basis and is tied to when the funds become available.</p> <p>For 7.5 answer for FY16, FY17, and FY18 using State's annual CAA application approval: In FY2016 we should answer 15 to 30 days In FY2017 we should answer 15 to 30 days In FY2018 we should answer 15 to 30 days</p>		See item NCAF 18. This is resolved b/c we are now measuring after Federal not state authority.

Section 7 State Use of Funds

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
5	Account. Measures: NCAF	DC	18	<p>2Sa should be modified. It only concerns the performance of the small state CSBG team, whereas all these performance expectations are of the states, not an individual office; the standard involves rapidly moving funds from the federal Treasury to the local agencies. It measures release “after ...state authority” is provided, i.e. after a different state body than the CSBG office approved the use of the funds. This accountability system is not a test of individuals nor of their section of a government or organization. All of these measures should reflect the performance of the entire state process, not only those parts for which the CSBG office is responsible.</p> <p>Recommendation: This should read “The State made funds available to eligible entities within 30 calendar days after Federal authority was provided. “</p> <p>In fact, our proposed construction offers state CSBG managers leverage when they are trying to free up money from the Office of the State Controller or a legislative body. Those are the most frequent creators of delayed cash flow. As written, the performance “clock” does not begin to run until the CSBG manager can access federal funds. History has taught us they are rarely the source of delay within the state.</p>	2Sa	<p>Several commenters asked for clarification of the accountability measure on the distribution of funds (2Sa), and definition of terms used in the measure and in questions 7.4 and 7.5 such as “state authority”. Many commenters were concerned that the 30 day time frame did not account for the variety of state distribution and contracting practices. Commenters said that some practices may result in funds reaching ees in a timely, consistent manner but not technically in the 30 day time frame described in the measure. These commenters felt the measure takes away States’ flexibility in how they distribute funds. Other commenters addressed the issue of when the time frame begins and thought the timeframe should include the full state process rather than just part of the state process.</p> <p>In response, we have simplified and revised the measure to capture the time frame of the entire state process (starting from after the federal award). However, we are retaining the 30 day timeframe to encourage timeliness and provide an accountability target. We have also added an explanatory footnote to address specific concerns raised by the commenters. States whose procedures may not meet the 30 day target, but still provide timely, consistent funding to ees, will have the opportunity to describe their distribution procedures in the MSP; if they are providing funds consistently and without lapses, they will be considered as meeting the standard.</p> <p>Change to MSP: The revised measure reads, “The state made funds available to eligible entities within 30 calendar days after federal award was provided.” The footnote reads, “This measure does not apply to funds distributed by OCS as small, irregular allotments, such as those distributed during a continuing resolution budget period..” In addition, see corresponding changes in MSP 7.5 and 7.5a, including the instructions.</p>

Section 7 State Use of Funds

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
5	Account Measures: Gail Hedges	IL	19	2Sa. Recommend changing to up to 90 calendar days. Because the actual receipt of notice from OCS can range from October through December, and sometimes later, it seems more logical to have a date range. Because of the fluctuating timeframe for notice, changing to up to 90 calendar days would make it possible for States to meet the criteria.	2Sa	See item NCAF 18.
6	OFFICIAL: Jennifer Dreilbis	NE	20	Again, this keeps states evaluating how to improve our timeliness and procedures and holds us accountable to make changes	supportive	√
6	OFFICIAL: MI Assoc, Kate White	MI	21	7.6 Recommend that any Performance Management Adjustment proposed by a state specifically include in the narrative the require feedback from the eligible entity, to ensure that this critical step is followed. Suggest that states be required to solicit input from eligible entities on what they see as priority performance management adjustments to grant administration procedures.		EE feedback will come through the ACSI survey, although states may also use other means.

Section 7 State Use of Funds

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
7.5	OFFICIAL: Paul Dragon	VT	22	7.5 Distribution Timeframe after State authority: The State uses the Federal Fiscal Year to distribute funds to eligible entities. In some years, we have not waited for federal authority to execute annual grant agreements with eligible entities and make funding available. When the final award is more or less than anticipated, we amend grant agreements as needed. Our State grants authority on the preceding July 1st, as part of the passage of the State Fiscal Year budget. In this way, funds are distributed 90 days after state authority, but in some cases prior to the receipt of the award letter from OCS. How would the State reflect kind of distribution timeframe be reflected in 7.5 or 7.5a?		See item NCAF 18.
7.5	OFFICIAL: Tikki Brown	MN	23	There are nuances to funding distribution that must be considered. For example, we recently received a very small initial Quarter 2 federal award. We could select "varies" to accommodate such nuances, but that would appear that the state does not have a consistent and reasonable process, when in fact we do. We recommend rewording for the above scenario and other nuances that impact distribution of funds by the States.		See item NCAF 18.
10	webinar: Wilma McKay	FL	24	What about when one funded activity would meet more than one category?	(Wilma is from the FL association)	Change to MSP: Add instructional note. "If a funded activity fits under more than one category, please allocate the funds between the categories. If this is not possible, allocate the funds to the main category for the activity."

Section 7 State Use of Funds

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10	webinar: Jennifer Sexson	KS	25	Does OCS believe the list in 675C(b)(1) to be in an order of preference?		No. In statute order.
10	webinar: Ditzah Wooden-Wade	MA	26	If a State opts not to use discretionary funds and pass through 95% of its allocation, how should this be reported?		Change to MSP: add a question with a yes/no response under 7.10: "Will the State have remainder/discretionary funds?"
10	OFFICIAL: CAP	DC	27	Section 7.10. Add to the text in Table "Use of Remainder/Discretionary Funds" to clarify that subsection (a) Training/technical assistance to eligible entities is inclusive of T/TA for those in TAP and QIP. As it currently points readers to 8.1, that section is unclear if it includes T/TA for a TAP or QIP situation or both.	endorsed: NASOSP	Other than the revision described below, T/TA for entities on QIPs and TAPs should fall under the categories already included. Change to MSP: for clarity, we have revised one t/ta categories in table 8.1 to read "Organizational Standards - for eligible entities with unmet standards on QIPs and TAPs"
10	NCAF	DC	28	Section 7.10 re: State Use of Funds, for purposes of clarity and comparability, this table should break out the amount and percentage of technical assistance by the same categories listed in 8.1.	SEE CAP	In balancing the need for accountability with State flexibility and the burden of data collection, we don't believe this level of detail is necessary. No change to MSP.
10	Account. Measures: NCAF	DC	29	3Sa We recommend that that the word "budget "to replace the phrase "dollars /percentages "or, better, that neither be used in the sentence after "strategy in the state plan". It is important that a state have the flexibility to channel T & TA resources to respond to unforeseen circumstances arising during the course of the year	3Sa	Agree with clearer language. Change to MSP: Replaced "dollars/percentages" with the word "budget."

Section 7 State Use of Funds

MSP	COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
10	OFFICIAL: NASCSP	DC	30	NASCSP echoes suggestions provided by the Community Action Partnership's COE with regards to Section 7.10. "Add to the text in Table "Use of Remainder/Discretionary Funds" to clarify that subsection (a) Training/technical assistance to eligible entities is inclusive of T/TA for those in TAP and QIP. As it currently points readers to 8.1, that section is unclear if it includes T/TA for a TAP or QIP situation or both."	Same as CAP	See CAP item 27.
10	OFFICIAL: Jennifer Dreilbis	NE	31	I think this is clearer than the narrative provided in previous state plans. States can more clearly see where money is going not just when we complete the annual CSBG -IS report.	supportive	√
10	OFFICIAL: Tikki Brown	MN	32	Table for question 7.10: This table is too prescriptive, and ignores the fluid nature of how states use CSBG Discretionary funding. This is a block grant. Predicting planned use to such a level of detail for 2 years seems difficult to the point of not being meaningful. Our past experience working with OCS does not make us confident that adjustments to any plan submitted will be timely. We recommend removing this table, and accepting narrative descriptions as sufficient. if the table is retained, we recommend adding a category (on p. 14) for "emergencies" (such as tornadoes, floods, or other unforeseen emergencies), which is an area we frequently fund.		This is meant to be a plan for the use of funds; while states may have many allowable reasons to deviate from the plan, OCS expects them to start out with a basic plan. These are the statutory categories. Emergencies can be included in "other."

Section 7 State Use of Funds

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
11	CAP webinar: John Cuneo	MA	33	Are there clear, specific standards for State distribution of discretionary funds in terms of eligible entities to whom to give funds & to what extent they are distributed among existing CAA's & the State Assoc. as distinct from non-CAA entities?		No specific standards; state flexibility.
11	webinar: Mamawah Hill	TN	34	The ees may think they should be getting a higher share of the discretionary funds, but that's only one consideration for how discretionary funds should be used.		Training / TA issue in TN?
12	OFFICIAL: MI Assoc, Kate White	MI	35	7.12 Recommend that states be required to have written policies and procedures detailing how will meet the requirement that states are to consider feedback from eligible entities before adjusting the plan and that the process is timely and sufficient as a practical matter.		See item 21 above. EE feedback will come through the ACSI survey, although states may also use other means.
12	webinar: Ditzah Wooden-Wade	MA	36	So eligible entities are the only ones surveyed, but discretionary funds can be used for more than eligible entities. Generally, the Ees may think they should be getting more of the Ees - but that feedback is only on consideration of how those funds should be used....??	Account measure 3Sb.	Ees are not the only ones surveyed, and the performance management question includes feedback from multiple sources. States can also seek additional feedback. (While there is tension between the ees and states on use of funds, the goal is accountability - states may use funds to do other CSBG-related activities, but should not have unrelated "pet" projects.) Change to MSP: In the performance management question, specifically reference the public hearing as another source of feedback: "...feedback from ees, OCS, and other sources, such as the public hearing."

Section 7 State Use of Funds

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
12	Account. Measures: Gail Hedges	IL	37	Recommend that as long as the state can explain or justify, the State should not be required to make changes to the State plan. There should be a mechanism for the State to provide rationale for their decision. If the justification is not acceptable to OCS, then a change to the State plan can be made.	3Sb	Agreed. The phrase "as appropriate" in the accountability measure allows the state flexibility in whether and how they adjust the plan, as long as they provide a justification and are transparent.
12	OFFICIAL: Jennifer Dreilbis	NE	38	Like the examples in the other questions, making the states explain how they are using the analysis and feedback keeps us accountable to use those comments etc and improve processes.	supportive	√
10 11 12	OCS CSBG Team		39	Recommend deletion of the term "discretionary" and use the term remainder funds as this aligns with the statutory language		We decided to use "remainder/discretionary" because both terms used in the statute.
1a	OCS CSBG Team		40	Recommend editing 7.1a to read "...formula for allocating a minimum of 90 percent funds..."		Change to MSP: We are adding a definition for "90 percent funds."
1a	OFFICIAL: Jennifer Dreilbis	NE	41	7.1a. Does the State statutory or regulatory authority specify the terms or formula for allocating the 90% funds among eligible entities? Yes no This question is confusing for states who do not have separate statute or regulations concerning CSBG.		From the IS survey. No change to the MSP.
2 7 10	NASCSP	DC	42	NASCSP also urges OCS to consider collecting numerical data around planned expenditures, not percentages, for maximum clarity and usability of the data.		There was no clear consensus on this issue, so we are leaving the option for states to use either.
5a	OFFICIAL: Jennifer Dreilbis	NE	43	This is good because it allows states to explain their procedures and lets OCS provide some guidance on the process and procedures as needed.	supportive	√

Section 7 State Use of Funds

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
7 8 9	OCS CSBG Team		44	Recommend providing additional guidance to States on administrative funds as many states are confused about the 5% admin cap. Perhaps IM 37 needs to be updated in light of new Omni Circular		Training / TA issue

Section 8 State Training and Technical Assistance Plan

MSP	COMMENTATOR	STATE	#	COMMENT	RELATES TO	RESPONSE
8	OFFICIAL: CAP	DC	1	Section 8. Add information on how the State plans to work the State Community Action Association in the provision and/or coordination of Training and Technical Assistance. State Associations are partners in the provision of T/TA. Asking States to describe how/if they will work with the State Community Action Association in their state would require a check off box of yes/no and possibly a short narrative description. Adding this would improve the quality, utility, and clarity of the MSP.	Endorsed: NASCSP, NCAF	Several commenters suggested including information about how the State plans to work with the state association and the RPICs in the provision of T/TA. Change to MSP: new question 8.3: "Indicate the types of organizations through which the State plans to provide training or technical assistance as described in item 8.1, and briefly describe their involvement? (Check all that apply.) [Narrative, 2500 Characters]"
8	OFFICIAL: CAP	DC	2	<i>Section 8. Add information on how the State plans to work with the identified Regional Performance and Innovation Consortia. As noted in IM 123, RPICs "will serve as regional focal points to lead the development of a comprehensive and integrated system of T/TA capacity-building activities with core functions of T/TA coordination and information dissemination." The Model State Plan would benefit by incorporating a check off box yes/no with a short narrative space for descriptive purposes. Adding this would improve the quality, utility, and clarity of the MSP.</i>	Endorsed: NASCSP, NCAF	See CAP item 1.

Section 8 State Training and Technical Assistance Plan

MSP	COMMENTATOR	STATE	#	COMMENT	RELATES TO	RESPONSE
8	OFFICIAL: NASCSP	DC	3	NASCSP echoes suggestions provided by the Community Action Partnership's COE with regards to Section 8. "Add information on how the State plans to work the State Community Action Association in the provision and/or coordination of Training and Technical Assistance. State Associations are partners in the provision of T/TA. Asking States to describe how/if they will work with the State Community Action Association in their state would require a check off box of yes/no and possibly a short narrative description. Adding this would improve the quality, utility, and clarity of the MSP."	Same as CAP #1	See CAP item 1.
8	OFFICIAL: NASCSP	DC	4	NASCSP echoes suggestions provided by the Community Action Partnership's COE with regards to Section 8. "Add information on how the State plans to work with the identified Regional Performance and Innovation Consortia. As noted in IM 123, RPICs "will serve as regional focal points to lead the development of a comprehensive and integrated system of T/TA capacity-building activities with core functions of T/TA coordination and information dissemination." The Model State Plan would benefit by incorporating a check off box yes/no with a short narrative space for descriptive purposes. Adding this would improve the quality, utility, and clarity of the MSP."	Same as CAP #2	See CAP item 1.
8.1	webinar: Jessica Rochester	MN	5	In section 8.1, can there be more than 1 drop down option per quarter or no response?		Training issue: use of table/add a row feature

Section 8 State Training and Technical Assistance Plan

MSP	COMMENTATOR	STATE	#	COMMENT	RELATES TO	RESPONSE
8.1	OFFICIAL: CAP	DC	6	<p>Section 8.1. Consider adding Technical Assistance for eligible entities implementing a Quality Improvement Plan. The Table “Training and Technical Assistance” under the third column “Category” in the fourth dropdown option lists “Organizational Standards – technical assistance for eligible entities with unmet needs” but does not include a similar option for eligible entities receiving technical assistance for a quality improvement plan. The dropdown list should include this option for reasons of quality, utility, and clarity to allow for the distinction between technical assistance directed towards technical assistance plans and quality improvement plans.</p>	<p>Endorsed: NSCSP, NCAF</p>	<p>Also, see item 15. In response to many comments asking for clarity and consistency, we have revised references to TAPs and QIPs in MSP section 6, and items 8.2 and 10.5, and in associated accountability measures 6Sb(i) and (ii). We are no longer defining TAPs and QIPs as having a time frame associated with them. Change to MSP: Revised the t/ta category that referenced TAP to include QIPs: "Organizational Standards – for eligible entities with unmet standards on Technical Assistance Plans or Quality Improvement Plans"</p>

Section 8 State Training and Technical Assistance Plan

MSP	COMMENTATOR	STATE	#	COMMENT	RELATES TO	RESPONSE
8.1	Act. Measures: CAP	DC	7	Measure 3Sc. The draft language in 3Sc should allow the State to clarify the reason for any divergence from the State plan for training and technical assistance. The draft language asks that the State affirm that it completed the training and technical assistance specified in the State plan. The concern here is that it can be difficult for states to predict specific training and technical assistance needs over the course of a year, for instance, in cases where eligible entities experience an unpredicted crisis that requires State resources to address. The Partnership recommends that the language specify the option for the State to explain any divergence from the original State plan	3Sc	Change to 3Sc: Several commenters were concerned that measure 3Sc that measured the completion of a training and TA plan would undermine State flexibility and responsiveness during the performance period. We revised the measure to read: "The State completed the training and technical assistance activities specified in its State plan, and/or and/or made appropriate adjustments in response to unanticipated needs."
8.1	OCS CSBG Team		8	Recommend editing the chart under 8.1 to more clearly outline 1st and 2nd fiscal year as each having four quarters and not 8 quarters		Change to MSP: clarified 1st and 2nd years rather than 8 quarters.
8.1	NCAF	DC	9	Section 8.1 add the item "Technical Assistance for eligible entities implementing a Quality Improvement Plan".	Same as CAP #6	See CAP item 6.

Section 8 State Training and Technical Assistance Plan

MSP	COMMENTATOR	STATE	#	COMMENT	RELATES TO	RESPONSE
8.1	OFFICIAL: NASCSP	DC	10	NASCSP echoes suggestions provided by the Community Action Partnership's COE with regards to Section 8.1. "Consider adding Technical Assistance for eligible entities implementing a Quality Improvement Plan. The Table "Training and Technical Assistance" under the third column "Category" in the fourth dropdown option lists "Organizational Standards - technical assistance for eligible entities with unmet needs" but does not include a similar option for eligible entities receiving technical assistance for a quality improvement plan. The dropdown list should include this option for reasons of quality, utility, and clarity to allow for the distinction between technical assistance directed towards technical assistance plans and quality improvement plans."	Same as CAP #6	See CAP item 6.
8.1	OFFICIAL: Jennifer Dreilbis	NE	11	This is a great way to help states stay on track with their planning for training and technical assistance and keeps states accountable to maintain their schedule as much as possible.	supportive	√
8.1	Account. Measures: Bill Brand	IA	12	3Sc- States are, and should be, required to provide TTA to its network as needed. Those needs can, and do, change for a wide variety of reasons, including crisis situations, emerging issues, changing economic environments, and funding availability. If changing conditions require the State to diverge from its original TTA plan, the State should not be penalized in any way for that. Therefore, any divergence from its plan should be explained, and that explanation should be a sufficient response.	3Sc	See CAP item 7.
8.1	OFFICIAL: Gabriella T eh	DC	13	It is recommend that dropdown options be changed to the same as 10.1 Target Date. (2 sets of 4 quarters.)		See item 8.

Section 8 State Training and Technical Assistance Plan

MSP	COMMENTATOR	STATE	#	COMMENT	RELATES TO	RESPONSE
8.1	OFFICIAL: Tikki Brown	MN	14	This table asking for training and technical assistance details by quarter is way too detailed. For 2 years (we complete a 2-year plan), this is not doable. Narrative description of an annual technical assistance plan - as we already report on with the CSBG-IS - is sufficient. Technical assistance is fluid and ongoing, and does not lend itself well to such a format.		Training issue; plan is not detailed and states may diverge in response to need.

Section 8 State Training and Technical Assistance Plan

MSP	COMMENTATOR	STATE	#	COMMENT	RELATES TO	RESPONSE
8.2	webinar: Ditzah Wooden- Wade	MA	15	How does a TAP differ from a QIP (Quality Improvement Plan)?	Accountability measures 6Sbi and ii	<p>Many commenters asked about TAPs and QIPs in several sections of the MSP and the accountability measures. Several commenters asked for clarification on question 8.2, which asks whether states had TAPs in place for unmet standards, but did not reference QIPs. Several asked for definitions for TAP and QIP and for clarification on the one-year timeframe for TAPs, referenced in 8.2 and the associated accountability measure, 6Sb. In response, we revised 8.2 and 8.1 in several ways to reduce confusion and the need for definitions.</p> <p>Change to MSP: In 8.1, revised the t/ta category that previously referenced only TAPs to include QIPs as well: "Organizational Standards – for eligible entities with unmet standards on Technical Assistance Plans or Quality Improvement Plans"</p> <p>Change to MSP: We have revised 8.2 to include QIPs as well as TAPs, to eliminate the timeframe, and to indicate that TAPs and QIPs are not necessarily put in place automatically but "as appropriate". We have also revised AM 6Sb in response to these and other comments (see section 10).</p> <p>Possible Change to MSP: include instructions or definitions.</p> <p>Training issue: QIP vs. TAP</p>

Section 8 State Training and Technical Assistance Plan

MSP	COMMENTATOR	STATE	#	COMMENT	RELATES TO	RESPONSE
8.2	webinar: Tricia Auberle	OK	16	Does 8.2 mean th the states must have assessed all eligible entities and worked out TAPs with those who did not meet standards by the time they submit the MSP, or is there more time to assess agencies to determine if there is unmet standards?		No. Change to MSP: possibly clarify that this is not answered in the first year. Training issue: question 8.2
8.2	webinar: Jessica Rochester	MN	17	For 8.2/[accoun measure] 6Sb - where does reporting about compliance with Org Standards that can't be fixed within one year i.e. - Strategic Planning and Community Assessment fit?		See item 15.
8.2	webinar: Jessica Rochester	MN	18	How does a TAP differ from a QIP?		See item 15.
8.2	webinar: James Leary	NY	19	If a TAP is not met, then does it go into a QIP?		See item 15.
8.2	OFFICIAL: Jennifer Dreilbis	NE	20	This again keeps states accountable to maintain their schedule and keep track of eligible entities that can turn around quickly.	supportive	√
8.2	OFFICIAL: CAPLAW	MA	21	Section 8.2 (Technical Assistance Plans for eligible entities for unmet organizational standards). This question asks whether the State has in place Technical Assistance Plans for all assessed eligible entities with unmet organizational standards that could be resolved within one year. We recommend that OCS clarify the meaning of this question. How does one determine whether unmet organizational standards could be met within one year? Are technical assistance plans not appropriate for eligible entities with organizational standards that cannot be met within one year? What is the significance of an eligible entity having unmet organizational standards that cannot be resolved within one year?		See item 15.

Section 8 State Training and Technical Assistance Plan

MSP	COMMENTATOR	STATE	#	COMMENT	RELATES TO	RESPONSE
8.2	OFFICIAL: September Ward	MI	22	This question seems more applicable during the 2nd year of this new plan.		Agreed. Change to MSP: added instruction, "Please skip question 8.2 if this is the implementation year for organizational standards."
8.2	OFFICIAL: CA Assoc., Adrienne Rolka	CA	23	8.2 Out of order. Understand correlation to 8.1, but assumes TAPs are a part of corrective action. Suggestion for item 8.2 to follow item 6.4 or be in Section 10: Fiscal Controls and Monitoring. If training and technical assistance are outcomes of Monitoring, you may want to have Section 8 follow Section 10.		This question serves the purpose of reminding the State about the relationship between organizational standards and T/TA. This is a good point; now that we have revised this to include QIPs as well, should this be moved to section 6? Plus, this would position the two account. measures on standards appropriately in section 6.
8.2	OFFICIAL: Patricia Swartz	NJ	24	This section asks for TAPs re: organizational standards but section 6.7 is to be skipped if this is the first year of plan. 8.2 can't be answered without knowing the answer to section 6.7		See item 22
8.2	OFFICIAL: Tikki Brown	MN	25	Remove the "within one year." A technical assistance plan may extend beyond that time period in some circumstances.		See item 15.
8.3	OFFICIAL: Jennifer Dreilbis	NE	26	Again, this makes states accountable after year one to use analysis and feedback to make changes to its plan as necessary and feasible.	supportive	√

Section 8 State Training and Technical Assistance Plan

MSP	COMMENTATOR	STATE	#	COMMENT	RELATES TO	RESPONSE
8.3	OFFICIAL: MI Assoc, Kate White	MI	27	8.3 Recommend that states be required to have written policies and procedures detailing how will meet the requirement that states are to consider feedback from eligible entities before adjusting the plan and that the process is timely and sufficient as a practical matter.	Same as comments in section 7 on performance management	EE feedback will come through the ACSI survey, although states may also use other means.
new 8.3	NCAF	DC	28	In section 8 of essential actors in the CSBG network's professional development and quality assurance strategy: the state associations and the regional organizations they have formed to promote training and organizational development. Recommendation 3: In section 8, add a listing [8.3] similar to the formatted list in item 8.1 that includes checkboxes for working with the State Community Action Association and the Regional Performance and Innovation Consortia with short narrative description.	Same as CAP #1 and 2	See CAP item 1.

Section 9 State Linkages and Communication

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
9	Account. Measures: Tikki Brown	MN	1	7Sa and 7Sb. State linkages and communication are essential parts of state-level work. We worry with the burdens of all the new reporting requirements that we won't have as much ability to conduct this important work. It would be very good to document as a national network what is lost and what it costs to implement these changes.	7Sa, 7Sb	Noted.
9.1	webinar: Jessica Rochester	MN	2	In 9.1 does the fact that administrators work with all these programs equal coordination or is it more detailed then that and relies on program working together?		Commenters asked what constituted a linkage, whether a linkage required establishment of an official "workgroup," and whether there was a minimum required number of linkages. OCS may need to provide further training and guidance here. This is not a new requirement. Training/TA: linkages
9.1	webinar: James Leary	NY	3	Is there a minimum threshold for number of linkages or frequency of linkages that will be required by OCS for approval of a plan (for instance, will daily contact be required?)		No, no minimum threshold. See item 2.
9.1	webinar: James Leary	NY	4	Would a State need to establish a formal "workgroup" with other State agencies for it to count as a linkage, or do regular but informal communications and calls count?		Workgroups are not required, but may be a "best practice." See item 2.

Section 9 State Linkages and Communication

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
9.1	Account. Measures: NCAF	DC	5	<p>7 S. We believe 7a does not provide a robust standard for State communications performance. It suggests providing report data is the single communications accomplishment expected. Frequent and clear communications regarding all management and funding information should be the indicators of appropriate state communications.</p> <p>NEW: We strongly recommend adding a # identical to the #8 under Federal accountability standards: "By 20xx, the state achieves an overall sub grantee satisfaction score of "x" (TBD).</p>	7Sa	<p>7Sb does allow for performance management feedback in communication; however, we agree that a robust overall satisfaction score for states would be useful.</p> <p>Change to MSP: We've added question 3.5, EE overall satisfaction, to set target for an ACSI state satisfaction score.</p> <p>Change to State measures: We've added a new measures, 8S: Eligible Entity Satisfaction.</p>
9.1	OFFICIAL: Jennifer Dreilbis	NE	6	<p>This is a good measurement of how collaboratively programs within a department work together to deliver services to low income people and communities. It could encourage program collaboration across departments as well.</p>	7Sa, supportive	√
9.1	OFFICIAL: Jennifer Dreilbis	NE	7	<p>It is a great way for states to think outside their department or their team to collaborate more with programs. In the past, states have been able to talk about the higher levels (admin level) and explain how those positions oversee a lot of these programs. However, the focus shifts to the program level, where this may not occur readily</p>	Supportive	√

Section 9 State Linkages and Communication

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
9.1	OFFICIAL: Barbara Mooney	PA	8	[Barbara suggests including another linkage/coordination choice: "Other programs directed by CSBG Administrator in FY20XX"] Does this relate to Section C of the CSBG IS report. Is [linkages with weatherization, LIHEAP, HUD] covered in "linkages" section 9.1?		We have made substantial changes to Section 9. However, we can get specific information we may need in the annual report as well, to collect any information we used to get in the IS report.
9.2	OFFICIAL: Jennifer Dreilbis	NE	9	Agencies are pretty strong in this area and there is a lot of local collaboration. In our previous state plans we relied heavily on these local activities to complete our linkages sections.	Supportive	√

Section 9 State Linkages and Communication

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
9.2	OFFICIAL: CAPLAW	MA	10	Section 9.2. Please clarify that linkages and coordination at the local level could be funded either by 90% funding that the eligible entities receive or by discretionary funds from the state.		<p>Agreed. 9.1 and 9.2 both reference the discretionary planned funding table in section 7, specifically the state and local linkages funding in 7.10b. However, we can clarify this reference and include the option of local entities using 90% funds.</p> <p>Change to MSP: The funding parenthetical in 9.1 now reads, "(CSBG funding used for this activity may be funded with some or all of the planned CSBG funds indicated under Item 7.10(b), Use of Remainder/Discretionary Funds). And in 9.2 now reads: "(This activity may be funded with some or all of the planned CSBG funds indicated under Item 7.10(b), Use of Remainder/Discretionary Funds and/or with local entity 90 percent funds.) "</p>

Section 9 State Linkages and Communication

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
9.2	OFFICIAL: Barbara Mooney	PA	11	This is really two levels of activity. What will the state do to ensure local-level linkage, and what will Ees do? [Funding for these activities] would be reported in old section E.		Barbara is pointing out that 9.2 is requiring a "roll-up" from local plans rather than focusing on just State plans and activities. This is the same issue raised under section 12 and in the assurances section. Change to MSP: Revised to be closer to the assurance language; changed from "Describe the linkages and coordination at the local level that the State and eligible entities plan to create..." to "Describe how the State will assure that the State and the eligible entities will coordinate and establish linkages..."
9.2	OFFICIAL: Barbara Mooney	PA	12	Could [the prepopulation to the corresponding assurance, item 14.5] be done by reference instead of prepopulating a separate section. The duplication seems to be a barrier to understanding. Maybe a hyper link at a later page to link back here?		Change to MSP: Changed "prepopulate" to "link to"

Section 9 State Linkages and Communication

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
9.2	OFFICIAL: Tikki Brown	MN	13	Local-level linkages and coordination will involve eligible entities, but only very rarely State Offices. Remove "the State and".		Assurance 676(b)(5) indicates that coordination and linkages are a state and eligible entity responsibility. In addition, one of the allowed uses for state discretionary funding is for coordinating State operated programs and "at the option of the State, locally-operated programs and services."
9.3	OFFICIAL: CAP	DC	14	Section 9.3. Add State Community Action Associations to the title and description. State activities for supporting coordination among the eligible entities should also include the state Community Action Association.	endorsed: NASCSP, NCAF	Under 9.3, coordination with ees, and 9.4, communication with ees, several commenters suggested including coordination and communication with the state associations as well. (These questions have now been renumbered as 9.7 and 9.8.) Change to MSP: Included State Community Action association to the title and question in 9.7 (formerly 9.3) and 9.8 (formerly 9.4.) Other change to MSP: updated parenthetical about funding per CAPLAW item 10.

Section 9 State Linkages and Communication

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
9.3	OFFICIAL: NASCS	DC	15	NASCS echoes suggestions provided by the Community Action Partnership's COE with regards to Section 9.3. "Add State Community Action Associations to the title and description. State activities for supporting coordination among the eligible entities should also include the state Community Action Association."	Same as CAP #14	See CAP item 14.
9.3	OFFICIAL: NCAF	DC	16	Add "State Community Action Association" to 9.3 and 9.4.	See CAP #14	See CAP item 14.
9.4	webinar: Jessica Rochester	MN	17	Under the "Expected Frequency" column in section 9, it would be nice to have another dropdown choice either labeled "Other" or "As Needed."		Several commenters asked for more "expected frequency" categories. Change to MSP: added "quarterly" and "other"
9.4	webinar: James Leary	NY	18	If you maintain a website with information and guidance, is that a form of daily contact/communication or is that "other"?		Training issue: How to fill out the 9.4 table.
9.4	OFFICIAL: CAP	DC	19	Section 9.4. Add State Community Action Association to the title and description. The description mentions "partners". This term can encompass many organizations but it is critical the State communicates with the State Community Action Association.	endorsed: NASCS, NCAF	See CAP item 14.
9.4	OFFICIAL: NASCS	DC	20	NASCS echoes suggestions provided by the Community Action Partnership's COE with regards to Section 9.4. "Add State Community Action Association to the title and description. The description mentions "partners". This term can encompass many organizations but it is critical the State communicates with the State Community Action Association."	Same as CAP #19	See CAP item 14.

Section 9 State Linkages and Communication

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
9.4	OFFICIAL: Jennifer Dreilbis	NE	21	This is great to formalize communication between states and eligible entities. Many have informal relationships and communication strategies but this makes the states think of a more strategic plan.	Supportive	√
9.4	OFFICIAL: CAPLAW	MA	22	Section 9.4. Please clarify that CSBG funding used by states to communicate about annual hearings and legislative hearings would be from state administrative funds rather than discretionary funds.		May need to discuss. Is this a big issue? While I changed the parenthetical about funding per CAPLAW item 10, I have not indicated that communication about hearing must come out of admin funds.
9.4	OFFICIAL: September Ward	MI	23	In the Table under "Expected Frequency", could additional choices be listed such as "As Needed" and "Other?"		See item 17.
9.4	OFFICIAL: CA Assoc., Adrienne Rolka	CA	24	9.4 Utility Improvement. Suggestion to provide dropdown options in the column label "Topics" in the Communications Plan table.		Not sure what the topics would be: (e.g. training/TA, monitoring, funding, general updates, success stories, combination?). Also this is the only commenter asking for this. No change to the MSP.
9.4	OFFICIAL: CA Assoc., Adrienne Rolka	CA	25	9.5 Lack of clarity. Suggestion to clarify that the State will provide feedback within 60 calendar day OF... (ex. with 60 calendar days of receiving their State-specific reports from OCS).		See item 32 below.
9.4	OFFICIAL: Patricia Swartz	NJ	26	Add quarterly and every other month as an option		See item 17.

Section 9 State Linkages and Communication

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
9.4	OFFICIAL: Gabriella Teh	DC	27	Under "Expected Frequency" - Consider including "Quarterly" and/or add "Other" as a dropdown option.		See item 17.
9.4	OFFICIAL: MI Assoc, Kate White	MI	28	9.4 Suggest that states also be required to solicit input from eligible entities on what has been successful, sufficient or inadequate communication with eligible entities.		Included as Accountability measures 7Sb.
9.4	OFFICIAL: Barbara Mooney	PA	29	Is [the communication plan] for all the agencies or for each agency? May have more frequent interaction with some agencies. Will there be a way to indicate that? Will the frequency match up with the format?		This communication plan is designed to capture a state wide strategy and not communication between the state and individual agencies.
9.4	OFFICIAL: Tikki Brown	MN	30	This question should be removed. It is too detailed. The table on page 17 must be removed. States can describe in narrative how they communicate with eligible entities, but to request this level of detail in a table is inappropriate.		We believe this chart is very basic. However, the state may also attach a narrative if they wish.
9.4	OFFICIAL: NCAF	DC	31	Add "State Community Action Association" to 9.3 and 9.4.	See CAP 14.	See CAP item 14.
9.5	webinar: Jessica Rochester	MN	32	For 9.5 and 5S(iv) - the language for the state plan should match the accountability measure more closely. The language about "after receiving feedback from OCS" has dropped off from one of the other.	accounta measure 5S(iv)	Change to MSP: Added "of getting feedback from OCS" to the question to match to measure's language.

Section 9 State Linkages and Communication

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
9.5	Account. Measures: NCAF	DC	33	5 S IV we have concerns re delay sharing the results of the satisfaction survey with the eligible entities. It is a very welcome measure; however there is no rationale for suggesting good performance means using up 60 days before reporting these straightforward results from the satisfaction survey. We propose that 15 days be substituted for 60 days.	5S(iv)	We do not want to impose a very strict timeframe on states, as they may have different approaches for providing this feedback. No change to 5S(iv)/now 5S(iii)
9.5	OFFICIAL: CAPLAW	MA	34	Section 9.5. This section would require a State to provide feedback within 60 calendar days to local entities and State Community Action Associations regarding performance on State Accountability Measures. Please clarify within 60 calendar days of what date or event.		See item 32.
9.5	OFFICIAL: September Ward	MI	35	This question seems more applicable during the 2nd year of this new plan.		correct.
9.5	OFFICIAL: Tikki Brown	MN	36	This is worded differently from the proposed State Accountability Measure 5S(iv). This language should be the same both here in the MSP and in the State Accountability Measures.		See item 32.
9.6	OFFICIAL: MI Assoc, Kate White	MI	37	9.6 Recommend that states be required to have written policies and procedures detailing how will meet the requirement that states are to consider feedback from eligible entities before adjusting the plan and that the process is timely and sufficient as a practical matter.		This is the purpose of the ACSI survey.

Section 10 Fiscal Controls and Monitoring

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.1	webinar: Jessica Rochester	MN	1	We'll put this in the formal comment as well, but -- For 10.1 - the dropdown options should also include biennial.		Our intent is to align categories with statutory language, not create multiple categories based on frequency (annual, vs biennial, vs. triennial). Change to MSP: For clarity, changed "triennial" to "full onsite."
10.1	webinar: September Ward	MI	2	Section 10 - 4Sa(i) - What if the state did not follow their plan that was in the state plan and had to adjust it? Does that mean they do not meet that measure?	account measure 4Sa(i)	No; will clarify in annual report and accountability measures training.
10.1	OFFICIAL: September Ward	MI	3	In the Table under "Review Type", could "Annual" be added as an additional choice?		See item 1.
10.1	OFFICIAL: September Ward	MI	4	The chart seems to be missing a key column. A column labeled CSBG Eligible Entity Status (Select Good Standing, At Risk, Under QIP, and Pending De-designation). For any agency marked At Risk, I would ask the State to input why. The label I think would be helpful to know about is the At Risk agencies. The State has access to multiple streams of information about the agencies. Monitoring and audit findings are not always the only sources in determining risk and evaluating accountability measures. At Risk agencies can lead to de-designation but these agencies still have time to be turned around. If you collected this type of status on the agencies, over time you could see what is leading to failures in the field or the solution to save the agencies.		This would be useful information, but the intent of this chart is only to provide a monitoring plan not report on ee status. This may be possible information for the annual report, however, the other challenge is creating standard categories since states approach monitoring differently. No change to the MSP.

Section 10 Fiscal Controls and Monitoring

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.1	OFFICIAL: Patricia Swartz	NJ	5	It's difficult to determine what quarter a particular agency will be monitored in the future especially since we work with auditing firm for part of the monitoring. However, our State knows which agencies will be monitored each year. Add an alternative option for indicating the fiscal year?		The intent is to create a plan. We would expect a state to have some idea and/or be able to estimate.
10.1	OFFICIAL: MI Assoc, Kate White	MI	6	10.10 Recommend that an additional Yes/ No question be added after 10.10, " Does the process followed comport with CSBG Act requirements?"		The statute is referenced in the questions.
10.1	OFFICIAL: Tikki Brown	MN	7	This question must be removed. It is too detailed for a block grant, and an inappropriate expectation of States. Monitoring schedules are dynamic and fluid based on a complex reality of factors including agency and staff availability, agency risk-level, board meeting schedules, weather and more. If this question is removed, consider adding a dropdown option of "Biennially" or "per contract period" for states that do it this way.		Monitoring of fees is statutorily required.
10.10.	OFFICIAL: Tikki Brown	MN	8	MN's state statute and rule specify that the local political subdivision designates the local CAA, and the state recognizes this designation. So, we would check "no" under the current wording, even though the state statute and provision define processes for designagtion and recognition. Reword this question to acknowledge states such as MN who have their own set-up.		See item 71 below. (This item is out of order.)

Section 10 Fiscal Controls and Monitoring

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.11	OFFICIAL: CAPLAW	MA	9	Section 10.11. It appears from 45 CFR 101(d)(1) that 45 CFR 200.302(a) does not apply to states. 45 CFR 101(d)(1) specifies that "Except for §75.202 and §§75.351 through 75.353 of subpart D of this part, the requirements in subpart C of this part, subpart D of this part, and subpart E of this part do not apply to the following programs: (1) The block grant awards authorized by the Omnibus Budget Reconciliation Act of 1981 (including Community Services, except to the extent that the cost and accounting standards of OMB apply to subrecipients of Community Services Block Grant funds pursuant to 42 U.S.C. 9916(a)(1)(B)."		question out to Jeff Pollich 3/31/15; response: "If ACF is talking about the requirements of the Uniform Guidance that are applicable to States or other direct grantees, we should be referring to the HHS adoption of the Uniform Guidance at 45 CFR Part 75." Change to MSP: updated 10.10 and 10.11 and 10.12.
10.11	OFFICIAL: September Ward	MI	10	This portion is not completed by the State contact, but by another entity within the Lead Agency (DHS). It will not be easy to incorporate into the state plan.		Is a requirement. See item 12 below. May need TA. No change to the MSP.
10.11	OFFICIAL: Annette Marchese	NY	11	Section 10, Item 10.11 or as its own item, should address the Federal Funding Accountability and Transparency Act (FFATA). It may include adequate tracking of funds for reporting as well as a question on whether the State's FFATA reporting is current.		Only comment on this.
10.12	OFFICIAL: Jennifer Dreilbis	NE	12	This may be problematic for state CSBG programs that give smaller awards to eligible entities. Those state offices may not be the state entity that issues the management letter. It may not be easy for state offices to know this information and report it if CSBG is not identified in the audit as a major program.	4Sd	Referred question to state assessment team 3/31/15; response is that the question is not clear and the commenter may need TA. No change to the MSP.

Section 10 Fiscal Controls and Monitoring

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.13	OFFICIAL: Joan A. Lee, Executive Director, CENLA CAA	LA	13	Reference is made to pre-populating Item 14.7 on page 26. The interactive pre-populated cross reference indicates Section 10, Question 10.12, Page 20. Should the pre-populated response be 10.13?		Change to MSP: changed 10.12 to 10.13 reference in item 14.7.
10.13	OFFICIAL: Meredith Collins, Executive Director, CAP of Mid-NE	NE	14	I am not sure how realistic it is to have the State come onsite every year to do a review of each agency's Organizational Performance Standards. _x000D_ Would annual online desktop reviews be considered with the onsite visit once every three years?	org standards annual assessment	See organziational standards section 6, item 1.
10.14	OFFICIAL: MI Assoc, Kate White	MI	15	10.14 Recommend that states be required to have written policies and procedures detailing how will meet the requirement that states are to consider feedback from eligible entities before adjusting the plan and that the process is timely and sufficient as a practical matter.		See similar items from this commenter; we believe this process is covered by the ACSI survey.
10.14	OFFICIAL: Paul Dragon	VT	16	10.14 Performance Management Adjustment associated with the State monitoring procedures and plan: We hope that it is the intent of OCS to allow a State to make necessary adjustments to its monitoring schedule between the time of the plan and the time of the report. And that the goals of transparency and documentation that the State is held to in terms of compliance, rather than strict schedules.		The intent of the question is to encourage the state to improve upon monitoring activities in the next plan, based on feedback on activities in the last plan. The state is not required to make an adjustment.
10.2	webinar: James Leary	NY	17	MSP question 10.2 do you want the actual monitoring instruments/tools to be uploaded in the response?"		Training issue

Section 10 Fiscal Controls and Monitoring

MSP	COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
10.2	OFFICIAL: CA Assoc., Adrienne Rolka	CA	18	10.2 Inconsistent. Suggestion to have state be more accountable by aligning question 10.2 to State Accountability Measure 4Sa(ii) by asking if the State disseminate monitoring reports to local entities within 60 calendar days? Yes or No? And if No, than in a sub-item question ask the State to explain how they plan to meet the accountability measure in the future.		The MSP does not track performance, so we don't want to ask about past performance. We are just asked about state procedures. No change to MSP.

**Section 10
Fiscal Controls and Monitoring**

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5	webinar: Ditzah Wooden-Wade	MA	19	Again I am confused between a technical assistance Plan (TAP) & a QIP. We have been using the QIP with expected timeframes up to a year depending on the issue when issuing our monitoring reports		(Also see Section 8, item 15.) In response to many comments asking for clarity and consistency, we have revised references to TAPs and QIPs in MSP section 6, and items 8.1, 8.2 and 10.5, and in associated accountability measures 6Sb(i) and (ii). We are not associating a timeframe with TAPs or QIPs. In addition, we are combining 6Sb(i) and (ii) into one measure to clarify our intent is only to ensure States are following up on any un-met standards. Finally, we are providing definitions for the terms with the state accountability measures. Change to AM 6S(b)(i) and (ii): The combined measure now reads "The State had in place Technical assistance plans (TAPs) and Quality Improvement Plans (QIPs) for all eligible entities with unmet standards."

Section 10 Fiscal Controls and Monitoring

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5	webinar: Ditzah Wooden-Wade	MA	20	I still have unreadiness about sharing the serious deficiencies as part of the state plan recognizing that the expectation is to have input on the state plan...I heard the comments about having the table for internal use but that makes me question why it should be in the state plan. I think we can consider another option for providing this information to OCS.		<p>Because of the concerns about listing agencies with serious deficiencies in a public plan, confusion over the definition of "serious deficiency" for CSBG, and the of diversity in corrective action practices across the network, we have removed the data collection table from the Model State Plan and also adjusted the questions and associated accountability measures to focus on Quality Improvement Plans rather than "serious deficiencies." OCS expects to collect specific information about the agencies on QIPs in the annual report, a practice suggested by commenters.</p> <p>Change to MSP: Under item 10.5, removed the table for States to list eligible entities with serious deficiencies. Instead, requesting the number of eligible entities on a Quality Improvement Plan.</p> <p>Change to 4Sa(iii): The measure now reads "The State reported eligible entities on Quality Improvement Plans to OCS within 60 calendar days of the State approving the QIP."</p> <p>Further Discussion: are we missing anything by only having States report QIPs in the MSP? Do we need to capture category of ee that the state may be moving toward funding termination without using a QIP first?</p>

Section 10 Fiscal Controls and Monitoring

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5	webinar: Rita Garza	TX	21	For State Accountability Measure 4Sc it would be good to add the word "serious" in front of deficiencies. Also, be sure MSP used serious deficiencies term.		Due to the confusion around the term "serious deficiency," we have largely removed the concept from the MSP and accountability measures. Since QIPs are developed because of deficiencies, the term can stand alone here w/o adding "serious".
10.5	webinar: Rita Garza	TX	22	I am confused between a technical assistance Plan (TAP) & a QIP. We have been using the QIP with expected timeframes up to a year depending on the issue when issuing our monitoring reports		See item 19.
10.5	webinar: Rita Garza	TX	23	MSP question 10.5 in the introductory language please make clear this only applies to eligible entities that are on a QIP not for regular monitoring findings. Is that correct? Does the serious deficiency have to lead to a QIP in order for us to report it in 10.5?		See item 20 above.
10.5	webinar: James Leary	NY	24	I do not see questions related to are there any eligible entities that did not have a QIP and that the State move straight to termination in funding?		We had the category of agencies with serious deficiencies but not on QIPs in the "serious deficiencies" table, but now that table is removed in the new draft. We were assuming that most states will put agencies on QIPs. We will see if this will suffice or if missing the category of agencies moving toward termination without a QIP is a problem?

Section 10 Fiscal Controls and Monitoring

MSP	COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5	webinar: Jennifer Sexson	KS	25	Though the serious deficiency list won't be available through OLDC . . . won't that info be subject to open records requests? Then too, having it as part of the State Plan but not available for inspection doesn't seem quite right."		See item 20 above.
10.5	OFFICIAL: Martha supa.dope.pha t.cack [mailto:hishop e3@gmail.com]		26	Question 10.5 Serious Deficiencies - recommend changing opening header to read "Serious Deficiencies Related to Quality Improvement Plan" so that States know this is not related to just any monitoring finding, but only related to serious deficiencies that are part of a Quality Improvement Plan.		See item 20 above.
10.5	OFFICIAL: Martha supa.dope.pha t.cack [mailto:hishop e3@gmail.com]		27	Question 10.5 Serious Deficiencies - Comment is related to the part of the question that reads "Subtotal number of QIPs related to organizational standards" sort of implies that if an eligible entity has failed to meet one or several organizational standards, they are then to be put on a Quality Improvement Plan. However, IM 138 does not make it an automatic that in cases where an eligible entity does not meet an organizational standard that then they have to be put on a Quality Improvement Plan. Recommend putting clarifying language.		See item 20 above.

Section 10 Fiscal Controls and Monitoring

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5	OFFICIAL: CAP	DC	28	<p>Section 10.5. Remove this table and do not require the State to list the names of the eligible entities that currently have one or more unresolved series deficiencies (and by extension, currently under a Quality Improvement Plan) as of the date of the submission of this State Plan. The reporting by eligible entity names goes beyond the purpose and intent of the State Plan. The State Plan is the document that describes how the State plans to operate and implement CSBG for the upcoming period. It is available for public comment and the State is to engage the CSBG Network in its development. As such, the Plan should not include the list of eligible entities in a QIP. While the State Accountability Measures do require states to report serious deficiencies, it does not require them to do so within the State Plan. The State Plan is a document that requires a public hearing and is a proposed plan of action. Such collection would be better suited in the Annual Report or other reports states provide to OCS as a result of monitoring. In addition, while the Model State Plan proposes that table 10.5 will only be available to states and OCS within the OLDC system, access to reported information in the State Plan may occur through unintended means, disclosing sensitive information to unintended sources.</p>	<p>Endorsed: NASCSP, CAPLAW</p>	<p>See item 20 above.</p>

Section 10 Fiscal Controls and Monitoring

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5	OFFICIAL: CAP	DC	29	<p>Section 1.5. Change the definition of serious deficiency. The definition of “serious deficiency” used in the State Accountability Measures (and by default in the model state plan) is not appropriate and using it as currently written will lead to confusion, inconsistencies in reporting and monitoring, and needs to be changed. As noted in the draft State Accountability Measures, a serious deficiency “means a finding that the Eligible Entity is not in compliance with Federal or State laws or eligible entity bylaws; or that the Eligible Entity has committed fraud, is in financial difficulty, or is not able to provide services.” While violations of Federal or State laws, fraud, and the inability to provide services are serious and should rise to serious deficiency, not being in compliance with organizational bylaws is not appropriate and needs to be removed. Bylaws are an internal governance document, covering a range of issues and vary by organization. In addition, bylaws can be changed by an organization following their amendment clause procedures leading to shifting baselines in measurement. In addition, as the Partnership recommended in its May 29, 2014 memo on the Draft IM regarding Organizational Standards Implementation, “Carefully and only when intentional, use the term ‘deficiency’. This term carries significant weight in the Network and should be used carefully and only (when) the full weight and intent of the term is needed.” Not being in compliance with one’s bylaws does not rise to this level and we strongly urge changing the definition of significant deficiency.</p>	Endorsed: NASCSP same as CAP #21	See item 20 above.

Section 10 Fiscal Controls and Monitoring

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5	Acct. Measures: CAP	DC	30	Measure 6Sb (ii). Remove the connection between a QIP and State Adopted Organizational Standards. QIPs are put into place when an eligible entity has serious issues related to legal requirements or viability (of the entity or program). Not meeting State Adopted Organizational Standards (which are outside statute or OMB requirements) should result in a Technical Assistance Plan with time to improve. Serious deficiencies (as defined in the draft measures) may fall outside of the State Adopted Organizational Standards, and the Standards should not be used to define Serious Deficiencies. As noted above in comment (3 - see comment on 3Sc under 8.1), the Partnership has serious concerns about the current definition of Serious Deficiency and recommends changes to the language.	6Sb(ii)	TAP/QIP. See Item 19 above.
10.5	Acct. Measures: CAP	DC	31	Footnote 18. The draft language in footnote 18 referenced in 6Sa (ii) [typo: 6Sb(ii)] should clarify that both technical assistance plans and quality improvement plans will at some future point be reported on a semi-annual basis. As currently written, the draft language in footnote is vague because it references 6Sa(ii) dealing with quality improvement plans but does not specifically mention that technical assistance plans will at some future point be reported on a semi-annual basis.	6Sb(ii) (and possibly 6Sb(i))	TAP/QIP. See Item 19 above.

Section 10 Fiscal Controls and Monitoring

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5	NCAF	DC	32	<p>Section 10.5. Requires the State to list the names of the eligible entities that currently have one or more unresolved "serious deficiencies" as of the date of the submission of this State Plan.</p> <p>Recommendation 2. We recommend omitting this section entirely. It is a report.</p> <p>We respectfully disagree with the OCS assertion that this report if unchanged would not be a publicly revealed because the data entry would be hidden when the HHS system generates a report. At the required public hearing, any observer can tell that an item in the numbering sequence is omitted and make inquiries or assumptions. To the extent state or federal monitoring reports are subject to FOIA, reports like section 10.5 will be public and the plan's electronic system cannot increase their secrecy. However, every state will be arousing suspicion by would-be muckrakers because the item is hidden whether it is empty or not.</p> <p>Since each plan at item 10.4 contains the information about resources to be devoted to improving local and agency operations, the essential information for the public and for the OCS reviewer - how a proposed plan improves performance - is clearly available.</p>		See item 20 above.

Section 10 Fiscal Controls and Monitoring

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5	Accoun. Measures: NCAF	DC	33	6Sb (ii). Remove the connection between a QIP and State Adopted Organizational Standards. QIPs are put into place when an eligible entity has serious issues related to legal requirements or viability (of the entity or program). Not meeting State Adopted Organizational Standards (which are outside statute or OMB requirements) should result in a Technical Assistance Plan with time to improve. Serious deficiencies (as defined in the draft measures) may fall outside of the State Adopted Organizational Standards, and the Standards should not be used to define Serious Deficiencies.	6Sb(ii)	TAP/QIP. See Item 19 above.

Section 10 Fiscal Controls and Monitoring

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5	OFFICIAL: NASCS	DC	34	<p>NASCS also echoes suggestions provided by the Community Action Partnership's COE with regards to Section 10.5. "Remove this table and do not require the State to list the names of the eligible entities that currently have one or more unresolved series deficiencies (and by extension, currently under a Quality Improvement Plan) as of the date of the submission of this State Plan. The reporting by eligible entity names goes beyond the purpose and intent of the State Plan.</p> <p>The State Plan is the document that describes how the State plans to operate and implement CSBG for the upcoming period. It is available for public comment and the State is to engage the CSBG Network in its development. As such, the Plan should not include the list of eligible entities in a QIP. While the State Accountability Measures do require States to report serious deficiencies, it does not require them to do so within the State Plan. The State Plan is a document that requires a public hearing and is a proposed plan of action. Such collection would be better suited in the Annual Report or other reports States provide to OCS as a result of monitoring. In addition, while the Model State Plan proposes that table 10.5 will only be available to States and OCS within the OLDC system, access to reported information in the State Plan may occur through unintended means, disclosing sensitive information to unintended sources."</p>	Same as CAP #18	See item 20 above.
10.5	OFFICIAL: NASCS	DC	35	<p>NASCS echoes suggestions provided by the Community Action Partnership's COE with regards to Section 10.5. "Change the definition of serious deficiency. The definition of "serious deficiency" used in the State Accountability Measures (and by default in the model state plan) is not appropriate and using it as currently written will lead to confusion, inconsistencies in reporting and monitoring, and needs to be changed....</p>	Same as CAP #19	See item 20 above.

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MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5	OFFICIAL: CAPLAW	MA	36	<p>Section 10.5. CAPLAW echoes and agrees with comments from NCAF and the Partnership that Table 10.5 should be removed from the Model State Plan. As noted by the Partnership,</p> <p>[T]he reporting of eligible entity names goes beyond the purpose and intent of the State Plan. The State Plan is the document that describes how the State plans to operate and implement CSBG for the upcoming period. It is available for public comment and the State is to engage the CSBG Network in its development. As such, the Plan should not include the list of eligible entities in a QIP. While the State Accountability Measures do require states to report serious deficiencies, it does not require them to do so within the State Plan. The State Plan is a document that requires a public hearing and is a proposed plan of action.</p> <p>As noted by NCAF, even if states will be able to print out a version of the state plan without Table 10.5, the state plan and that table would likely be subject to both state and federal Freedom of Information Act requests.</p>		See item 20 above.
10.5	OFFICIAL: CAPLAW	MA	37	<p>Also, as CAPLAW has commented in our feedback on the State and Federal Accountability Measures, to the extent that the term "serious deficiency" is to be used in the CSBG Model State Plan and State and Federal Accountability Measures, CAPLAW recommends that this definition be revised and more closely aligned with the federal CSBG Act and OCS's interpretation of the CSBG Act in Information Memorandum (IM) 116.... See CAPLAW Memo</p>	Same as CAPLAW comment on accoun. Measures	See item 20 above.

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MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5	Account. Measures: Verna Best	NC	38	<p>Agency Risk Status should not be included in the state plan. By virtue of the fact that the state plan is intended to be widely publicized and disseminated document; disclosing risk level in this manner may have an adverse impact on individual agencies and the network as a whole. While it is public information, we suggest an alternative reporting format such as the quarterly call/report format used by some OCS Program Specialists. It is noted that the Serious Deficiency Table would only be available to States and OCS in the Online Data Collection System (OLDC) which seems to support why it should be included as part of the State Plan. All information included in the State Plan should be accessible to all stakeholders on the federal, state and local levels.</p>	4Sc, 4Sd	See item 20 above.

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MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5	OFFICIAL: September Ward	MI	39	<p>QIP – Quality Improvement Plan: Does that relate to all the findings and issues identified at the agency? or Does it relate to one finding? A typically monitoring report could contain several findings with a request for several quality improvement plans. If our State counts each finding with a corresponding QIP separately and a different State counts each monitoring report (several findings) with a corresponding QIP as one, we are not measuring the same between States.</p> <p>State Monitoring Report CAA Finding QIP A 10/1/15 1 Over Income 1 QIP A 10/1/15 1 Cost Allocation 1 QIP A 10/1/15 1 Board 1 QIP Total QIP for State A 3 QIP</p> <p>B 11/1/15 10 Over Income 1 QIP Cost Allocation Board _____ Total QIP for State B 1 QIP</p> <p>Note: State A has 3 QIPs and State B has 1 QIP but State A has 3 serious deficiencies while State B has 10. The Model State Plan is calculating the QIP total.</p>		See items 19 and 20. Removing the deficiencies table should clear this up. The new MSP question 10.5 now only asks for the number of QIPs, (whether it is one or several, according to state procedures).
10.5	OFFICIAL: September Ward	MI	40	<p>The chart seems to be missing data elements. A column for the date of the serious deficiency or deficiencies was communicated to the eligible entity (date of monitoring report) is needed. If the answer is yes to a QIP, then a statement on action steps and timeframe to make corrections would be helpful and a statement on the progress of the action steps.</p>		See item 20. We are simplifying for the MSP and may ask more detail in the Annual report.

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MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5	OFFICIAL: September Ward	MI	41	If the States are only reporting serious deficiencies, chances are the agency will be de-designated. The OLDC System does not collect enough information before an at risk agency is reporting to having serious deficiencies and major problems. (See solution in comment on 10.1)		Commenter is referencing item 4. OCS does not intend to gather detailed information on the status of all entities in the MSP.
10.5	OFFICIAL: September Ward	MI	42	As the State enters serious deficiencies in the OLDC System, it would be helpful to upload the monitoring report and field notes. Since this information is being submitted to you in real time, it would be helpful if a federal opinion could be rendered in real time as well. A Column in the system labeled Federal Review (Approved, Pending, or Denied) would help the States implement the next action steps; training or de-designation. Access to information comes with responsibility – How can you use this information to help the States to expedient corrective action? I've made one suggestion. The OLDC System will help State and Federal regulators to be on the same page but both will need to know to work together as the information is shared.		See item 41 and item 4.
10.5	OFFICIAL: Ditzah Wooden-Wade	MA	43	Since the Model State Plan (MSP) is a point in time reporting, the monitoring schedule for CAAs, whether organizational standards, or the planned triennial monitoring, will not be in alignment. Reporting of the State's CAAs with deficiencies, coupled with TAPs/QIPs, the state would not have the information readily available to report out on the MSP.		OCS's intent is for the State to provide a monitoring plan and provide some minimal information about QIPs; we have simplified the questions and measures accordingly. See item 20 and 19.

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MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5	OFFICIAL: Ditzah Wooden-Wade	MA	44	There should be another mechanism outside of the MSP to report on CAAs with “serious” deficiencies. Working with agencies requiring significant assistance to correct or address their issues should be reported outside the MSP, since oftentimes the assistance required is a :work-in-progress” over time.		See CAP item 20.
10.5	OFFICIAL: CA Assoc., Adrienne Rolka	CA	45	10.5 Recommend removal. The State Plan is a public document and despite being able to print out a copy of the Plan without this table, if will still be able to be access in its original form by the public. If leaving in, OCS must define Serious Deficiencies to ensure uniform reporting of deficiencies from States.		Agreed. See item 20.
10.5	OFFICIAL: CA Assoc., Adrienne Rolka	CA	46	10.5 Table discrepancy. Under the column labeled “Eligible Entity” in Table 10.5, dropdown choices refer to item 4.1 when it should refer to item 5.1, we believe.		Correct; however, Table under 10.5 now removed.
10.5	OFFICIAL: CA Assoc., Adrienne Rolka	CA	47	10.5 Utility Improvement. In alignment with the suggestion above to define Serious Deficiencies, suggestion to provide dropdown options in the column label “Serious Deficiency” in Table 10.5 in accordance with predefined “Serious Deficiencies.” Also, suggestion to put “or deficiencies” in parentheses for clarity.		See item 20.
10.5	OFFICIAL: Patricia Swartz	NJ	48	Need a definition for serious deficiencies. Are they serious deficiencies from past monitoring, from their audits or both? You may want to add check off with these options listed?	serious deficiency	See item 20.
10.5	OFFICIAL: MI Assoc, Kate White	MI	49	10.5 Recommend more guidance be provided in the model state plan on the distinction between “deficiencies” (in 10.4) and “serious deficiencies” (in 10.5) so states can determine which monitoring findings will trigger the QIPs , timetable and reporting required under 10.5 & 10.6	serious deficiency	See item 20.

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MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5	OFFICIAL: Paul Dragon	VT	50	10.5 Serious Deficiencies: Thank you for protecting sensitive information in a public state plan.	serious deficiency	See item 20.
10.5	OFFICIAL: Tikki Brown	MN	51	This table must be removed. With the Freedom of Information Act, it seems very unlikely that this information, if provided, could be protected. Further, serious deficiencies is not defined and reporting it to OCS via a 2 year plan does not allow for the most current, up-to-date information which is critical.		See item 20.
10.6	webinar: Rita Garza	TX	52	MSP is missing question 10.6, goes from 10.5 to 10.7.		Updated
10.6	Acct. Measures: CAP	DC	53	Measure 4Sa (iii). Remove the requirement to require the State to report serious deficiencies to OCS as currently defined. As defined in Footnote 9 of Appendix 2 of the Draft State and Federal Accountability Measures, serious deficiencies are broad in scope and will lead to confusion, micromanagement, and inconsistency of monitoring. As such, having States report eligible entities with this broad definition of serious deficiency will lead to eligible entities being reported for what could easily be issues related to calendar and scheduling, rather than focused on issues related to risk and viability.	4Sa(iii); serious deficiency	See item 20. Plus, due to concerns and confusion over the definition of "serious deficiencies," we have changed the measure to "Quality Improvement Plan." Change to State Measure 4Sa(iii): The measure now reads "The State reported eligible entities on Quality Improvement Plans to OCS within 30 calendar days of the State approving the QIP."

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MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.6	Acct. Measures: CAP	DC	54	<p>Measure 4Sa (iii) and accompanying Footnote 9. Change the definition of serious deficiency. The definition of “serious deficiency” used in the State Accountability Measures (and by default in the Model State Plan) needs to be changed to reflect true serious issues related to risk and viability. The current definition expands beyond the scope of serious deficiencies and using it as currently written will lead to confusion and inconsistencies in reporting and monitoring. As defined in Footnote 9 in the draft State Accountability Measures, a serious deficiency “means a finding that the Eligible Entity is not in compliance with Federal or State laws or eligible entity bylaws; or that the Eligible Entity has committed fraud, is in financial difficulty, or is not able to provide services.” While violations Federal or State laws, fraud, and inability to provide services are serious and should rise to serious deficiency, not being in compliance with organizational bylaws is not appropriate and needs to be removed. Bylaws are internal governance documents that vary by organization in the type and number of issues included. In addition, bylaws can be changed by an organization following their amendment clause procedures leading to shifting baselines in measurement. As the Partnership recommended in its May 29, 2014 memo on the Draft IM regarding Organizational Standards Implementation, “Carefully and only when intentional, use the term ‘deficiency’. This term carries significant weight in the Network and should be used carefully and only (when) the full weight and intent of the term is needed.” Not being in compliance with one’s bylaws does not rise to this level and we strongly urge changing the definition of significant deficiency.</p>	Account. Measure 4Sa(iii) (Same as CAP #19)	See item 53 above.

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MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.6	Accoun. Measures: NCAF	DC	55	4Sa (iii). We urge OCS to remove the requirement that the State report serious deficiencies to OCS "s currently defined. As defined in Footnote 9 of Appendix 2 of the Draft State and Federal Accountability Measures, "serious deficiencies" are broad in scope and will lead to confusion, micromanagement, and inconsistency of monitoring.	4Sa(iii); serious deficiency	See item 53 above.
10.6	Accoun. Measures: NCAF	DC	56	4Sa (iii). We urge a change in the definition of serious deficiency. The definition of "serious deficiency" used in the State Accountability Measures needs to reflect truly serious issues related to imminent risk and viability. However, as defined in Footnote 9 in the draft State Accountability Measures, a serious deficiency "means a finding that the Eligible Entity is not in compliance with Federal or State laws or eligible entity bylaws; or that the Eligible Entity has committed fraud, is in financial difficulty, or is not able to provide services." While the other items- violations of Federal or State laws, fraud, and inability to provide services are serious and should rise to serious deficiency - not being in compliance with organizational bylaws is not comparable and should be removed. Bylaws are internal governance documents that vary by organization in the type and number of issues included.	4Sa(iii); serious deficiency	See item 53 above.
10.6	Accoun. Measures: NCAF	DC	57	We endorse the measures 4B through 4D.	4Sb and d; supportive	√

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MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.6	Accoun. Measures: Gail Gedges	IL	58	<p>Recommend that the definition be more descriptive. For example, in financial difficulty is somewhat subjective. Not making payroll because the fiscal office didn't request cash or the receipt of cash was later than usual doesn't necessarily mean an entity is in a serious deficiency situation. However, if this is fairly common then the entity is most likely in a serious deficiency situation. Also, bylaws need to be removed. Although the bylaws are critical to the operation of the governing board/advisory board, being in noncompliance with everything included in good bylaws does not constitute being a serious deficiency. Also, bylaws can easily be amended to bring the entity into compliance.</p>	4Sa(iii); serious deficiency	See item 53 above.

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MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.6	Accoun. Measures: Josh Summers, OH CA Association	OH	59	Another concern we would like to address is language related to Grantee Monitoring and Corrective Action. State Accountability Measure 4Sa. iii. refers to "serious deficiencies" which are defined as a finding that the Eligible Entity is not in compliance with Federal or State laws or eligible entity bylaws; or that the Eligible Entity has committed fraud, is in financial difficulty, or is not able to provide services. This language seems to go beyond what is required under the CSBG Act and IM 116, which do not include compliance as it relates to eligible entity bylaws nor does it allow States to consider financial difficulty or the ability to provide services in its compliance review. This can be problematic for a number of reasons. For example States may not be equipped to review eligible entity bylaws to determine compliance nor should bylaws be considered as part of a compliance review as they are internal governance documents that can be modified. Additionally, consideration of "financial difficulty" and "ability to provide services" are overly broad and could be used inappropriately to terminate or reduce funding of an eligible entity. Determining financial difficulty and ability to provide services is entirely subjective and should not be included as criteria for reporting a serious deficiency.	4Sa(iii); serious deficiency	See item 53 above.
10.6	Accoun. Measures: CAPLAW	MA	60	See CAPLAW memo.	4Sa(iii); serious deficiency	See item 53 above.
10.7	OFFICIAL: CAPLAW	MA	61	Section 10.7 should include a question asking whether the state has withheld any funding from an eligible entity without first following the procedures required by 676(b)(8) and 678C.		This question would be appropriate for the Annual Report, which will have a separate OMB clearance.

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MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.7	OFFICIAL: CA Assoc., Adrienne Rolka	CA	62	10.7 Recommend removal. Do not see the practical utility for item 10.7 if it is just a yes or no question already addressed by an assurance.		The assurance is required; the intent is to integrate assurances into the appropriate content areas in the plan.
10.7	OFFICIAL: MI Assoc, Kate White	MI	63	10.7 This is a very important assurance for CAAs made by the states. Particularly for CAAs in states that the lead agency is not familiar with applying the unique procedures mandated under the CSBG Act. Recommend that, in addition to the language provided, the section requires that the notice and hearing provided comports with CSBG standards, and that "cause" is defined within the intent of the CSBG Act.		We believe the assurance is enough for the MSP.
10.10.	OFFICIAL: September Ward	MI	64	What is Re-Designation?		Training issue.
10.11, 10.12	OFFICIAL: CAPLAW	MA	65	Sections 10.11 and 10.12. References to 2 CFR Part 200 in sections 10.11 and 10.12 should be changed to 45 CFR Part 75, the HHS version of the Uniform Guidance.		See item 9.

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MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5 / 10.6	OFFICIAL: Martha supa.dope.pha t.cack [mailto:hishop e3@gmail.com]		66	<p>Comment: OCS may want to consider further defining “serious deficiency” to limit it to very serious deficiencies related to fraud, waste, or abuse or is in financial difficulty, or is not able to provide services or has not complied with Federal laws or State laws related to x,y,z (specify). The way it reads now leaves it wide open for States to use even minor non-compliance issues to find that an eligible entity has a serious deficiency and to start down the road of funding termination. What is the true intent of this accountability measure? I think some serious deliberation needs to be given to coming up with a tighter more narrow definition of serious deficiency. Perhaps, it could even include consulting with OCS for concurrence that an issue/finding or findings is in OCS’s opinion a “serious deficiency” that merits being defined as a serious deficiency. Also, this needs to some way tie to IM 116.</p>	Account measures 4Sa(iii)	See item 53 above.

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MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5 and 6.4	NCAF	DC	67	<p>A related concern [to item 25] – the definition of deficiencies: When OCS develops the alternative, a report or monitoring form amendment with respect to requiring report on subgrantees with ‘serious” deficiencies as a substitute for this item misplaced in the Plan, we urge the OCS to amend the definition of this term. The new definition is found, inappropriately we believe, in the proposed performance standards. Please see our comment regarding the inappropriate inclusion of the agency by-laws in the deficiency definition category in the attached document commenting on performance standards.</p> <p>This recommended change will also affect Item 6.4 of the plan regarding technical assistance by the state. We urge replacing the term “corrective action” with “improvement”. The term corrective action is tied to a Quality Improvement Plan in IM 116 and in related sections of the federal Uniform Administrative regulation and carries connotations of major dysfunction. The OCS 2014 IM 138 on standards and technical assistance references Technical Assistance Plans (Taps) for eligible entities not meeting Standards, whether or not they have serious shortcomings, as is appropriate.</p>	serious deficiency	See items 19 and 20 above.
10.5, 10.12	Account. Measures: Verna Best	NC	68	Expectations in 4Sc and 4Sd should be clarified as additional information seems to be contained in the footnotes but not the actual language of the measure.	4Sc, 4Sd	Training and TA issue.

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MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
10.5, 10.6	Account. Measures: Tikki Brown	MN	69	Remove the requirement to require the State to report serious deficiencies to OCS as currently defined. Footnotes 10 and 12 are vague and alarming. It is inappropriate to use the State accountability measures as a tool for communication between States and OCS about eligible entities with serious deficiencies. First such information is sensitive and needs to be kept private, and seems likely to be subject to Freedom of Information Act (FOIA) requests. Secondly, the resolution of local eligible entity deficiencies is ongoing and dynamic, and thus is inappropriate for inclusion in an annual or biannual plan (which represents a point-in-time only).	4Sa(iii); serious deficiency; 4Sc	See item 20.
10.5?	webinar: Kathi Skoglund	SD	70	"11.2 What about TAP's ... you mention exemption of QIP's & CAP's"		TAP/QIP. See Item 19 above.
10.8, 10.9, 10.10	OFFICIAL: NASCSP	DC	71	Sections 10.8, 10.9 and 10.10. Add comment boxes as some States do not have a guiding state statute for CSBG or a state rule (only the authority as lead agency). These items are included in a state plan as the authority and any policy manual the state may have but the YES/NO only boxes would make it look like as though States do not have these required items in place.		We received several comments on the intent of these questions, and to allow states to provide additional information rather than just yes/no, particularly if they don't have statute or regs on these specific areas. Change to MSP: added option to add cite to law/regs or to explain state procedures in the absence of state regs/law.

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MSP	COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
10.8, 10.9, 10.10	OFFICIAL: Jennifer Dreilbis	NE	72	10.8 Does the state CSBG statute or regulations provide for the designation of new eligible entities 10.9 "" de-designation 10.10 "" process for de-designation The wording of these might be confusing to states that do not have separate statutes or regulations relating to CSBG. For example, states may follow the federal CSBG Act, Informational Memorandums (like IM 116) and Dear Colleague letters to manage situations like designation or de-designation.		See item 71.
10.8, 10.9, 10.10	OFFICIAL: CA Assoc., Adrienne Rolka	CA	73	10.8 - 10.10 Recommend removal or change. Do not see the practical utility or purpose in these items if a State says yes or no. If yes, there is no request for a link to statutes or regulations. If no, does it matter or is it even required since there is no reference to the CSBG Act.		See item 71.
10.8, 10.9, 10.10	OFFICIAL: Paul Dragon	VT	74	10.8, 10.9, 10.10: State statute or regulations that provide for designation or de-designation of eligible entities: Our State has general language in statute, but has relied on the clear requirements of the federal CSBG Statute and IMs issued by the Office of Community Services. These seem to be sufficient. Is it the intent that the State now have more specific regulations at the State level?		See item 71.

Section 10 Fiscal Controls and Monitoring

MSP	COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
Gen	NCAF	DC	75	<p>The treatment of monitoring findings and reports in the Model Plan: The Model Plan proposed contains two items that are purely reporting elements on past or current activities. These data are misplaced in a Plan; plan content should address [and in the case of the proposed model, does with these two glaring exceptions] proposed activities and resources devoted to continuing or changing conditions.</p> <p>Grantees should be reporting on conditions related to local and state management issues regularly in a different format. The Plan document cannot serve as a substitute for OCS collection and review of both annual reports and monitoring reports from the state. We are certain the federal oversight and monitoring system already encompasses authority to collect information separately on state corrective action of its operations and on state-monitored local performance, oversight and, where needed, improvement.</p>		See item 20 above.
Gen	OFFICIAL: NASCSP	DC	76	<p>Since the State Plan is submitted by States either annually or biennially and the request for the list of agencies is as the date of the submission of the State Plan, OCS should consider allowing States to provide or submit this information through another mechanism that not only provides point in time status but allows for reporting of regular updates and resolution.</p>		See item 20 above.
new	Accoun. Measures: NCAF	DC	77	<p>4S Recommendation: under #4 an important addition would be: Has the state implemented standard monitoring practices and definitions to ensure eligible entities and other grantees are monitored in a uniform and standardized manner by all personnel?</p>	4S	This is a good point, but seems like too much detail for the MSP. Quality of monitoring staff might be a good issue to raise in the ACSI survey.

Section 11 Eligible Entity Tripartite Board

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
11.1	OFFICIAL: Barbara Mooney	PA	1	Maybe a list of Ees from earlier could be prepopulated here so that each can be checked. Otherwise you'll have all three checked and some may be for a few agencies but not all, etc. How many agency's board meetings will be attended? In a state with many agencies this information will be meaningless unless it indicates the scope of each measure.		OCS's intent is to get some basic information about State policies and procedures without getting too prescriptive/burdensome. No change to MSP.
11.1	OFFICIAL: Tikki Brown	MN	2	Change "keep a register" to "track". States should be able to decide whether and how to do this. At current administrative levels of 5%, this seems difficult to accomplish. We currently attend board meetings as we are able. It is difficult to schedule and difficult to make work but we do see it as a useful activity. Suggest addition of "meet with board representatives."		OK. Change to MSP: Changed "keep a register" to "track" to indicate flexibility.
11.2	OFFICIAL: CAPLAW	MA	3	Section 11.2. A box for "Other" and space for a response should be added to this section. Many states require eligible entities to provide updates after every board meeting, which may occur less frequently than monthly but more frequently than quarterly.		Agree. Change to MSP: added a check box for "other" with a text box.
11.2	OFFICIAL: September Ward	MI	4	Could you add additional choices, such as "As Updated" and "As Approved?"		See item 3; adding "other" should cover other scenarios.
11.2	OFFICIAL: September Ward	MI	5	The state sets policy that direct eligible entities on how to get representation for their boards. The state does not require the eligible entity to have a policy. Is this a requirement?		Training issue: tripartite boards guidance for states
11.2	OFFICIAL: Tikki Brown	MN	6	Add "or as frequently as they meet" as an option (perhaps in conjunction with "Monthly").		See item 3 and 4.

Section 11 Eligible Entity Tripartite Board

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
11.4	OFFICIAL: CAPLAW	MA	7	Section 11.4 should be added asking states whether they permit public eligible entities to use, as an alternative to a tripartite board, "another mechanism specified by the State to assure decisionmaking and participation by low-income individuals in the development, planning, implementation, and evaluation of programs funded under this subtitle.		Change to MSP: New question 11.4: Does the State permit public eligible entities to use, as an alternative to a tripartite board, "another mechanism specified by the State to assure decisionmaking and participation by low-income individuals in the development, planning, implementation, and evaluation of programs" as allowed under Section 676B(b)(2) of the CSBG Act."

Section 12 Individual and Community Eligibility Requirements

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
12	OFFICIAL: Patricia Swartz	NJ	1	This section mentions individual income but CSBG considers household income. Shouldn't it be listed as household income?		The Act refers to the "poverty line" to determine eligibility; this measure could be applied to an individual or family. Change to MSP: To reduce confusion, removed the word "individual" from the question.
12.2	webinar: Rita Garza	TX	2	For 12.3 what about services where they have like a Christmas Toy distribution and they get hundreds of people line up the day of distribution or Thanksgiving Food Baskets. Would e.e. be able to just take a declaration of income form without actual income documentation or not request either?		Training/Technical assistance issue
12.2	OFFICIAL: Barbara Mooney	PA	3	[indicate whether the services needing income eligibility verification are] provided wholly or in part by CSBG \$? Not needed if no CSBG \$s used?		These are services funded wholly or in part by CSBG; other programs would follow their own eligibility guidelines.
12.2	OFFICIAL: Barbara Mooney	PA	4	[Insert a new question: "How many individuals are targeted to be served with limited in-take procedures?"] It would be excellent to start getting agencies to project how many people they will serve in this fashion.		Too much detail and would require a "roll-up" of all the local plans. No change to MSP.
12.3	OFFICIAL: Barbara Mooney	PA	5	Is there a sample of how [ees can ensure their services target low-income communities]? If community level change is to be important, states and agencies need to understand how the eligibility requirements will work for this kind of activity.		Training/Technical assistance issue

Section 12 Individual and Community Eligibility Requirements

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
12.1b	OFFICIAL: NASCSP	DC	6	<p>Section 12.1b: This section appears to remove some of the flexibility integral to the community services block grant. Some States allow for agencies to develop their participant eligibility requirement as long as the clients meet the income guidelines, and as such, would choose “no” as the option for response. It is unclear what the result of this question will be – for example, will OCS ask the States in question to modify their procedures and policies in order to answer “yes”? NASCSP feels that this question does not provide valuable information to OCS and may dictate a more uniform structure that is not true to the flexibility of this grant for the state or for the eligible entities.</p>		<p>One commenter was concerned that 12.1b puts pressure on States to have a uniform policy, taking away State flexibility in this area, and the question does not add useful information beyond what is indicated under 12.1a. Another commenter was confused by the question.</p> <p>The intent of the question was to gather basic information about how eligibility is determined across the state; this can be accomplished with 12.1a exclusively.</p> <p>Change to the MSP: deleted question 12.1b</p>
12.1b	OFFICIAL: Jennifer Dreilbis	NE	7	<p>12.1b. Does the state have a policy for participant eligibility This might be confusing for states without separate statute or regulations from the CSBG Act. States may follow the CSBG Act rules for eligibility and federal and state laws but there is not a separate CSBG specific document.</p>		<p>See item 6.</p>

Section 12 Individual and Community Eligibility Requirements

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
12.2, 12.3	OFFICIAL: Jennifer Dreilbis	NE	8	<p>12.2 general/short term services- how verify income for services , ex. Emergency food assistance</p> <p>12.3 community wide benefit- how does the entity ensure the service targets low income</p> <p>I think these are great questions and splitting them out requires eligible entities and the states to work with two conflicting populations and ensure they are not putting undue burden on one (emergency services). It also allows eligible entities and the states to think about community in a different manner and make sure they don't lose the low income focus in the name of community development with CSBG funds</p>	supportive	✓
12.2, 12.3	OFFICIAL: CA Assoc., Adrienne Rolka	CA	9	<p>12.2 & 12.3 Recommend change. Suggestion for items to increase State accountability, since this is the State's Plan, by asking not "how do eligible entities..." but by asking "how does the State ensure that eligible entities..."</p>		<p>Changing the wording to "how does the state ensure that eligible entities..." significantly shifts the question from gathering informatoin on EE practices to gathering info on state oversight. While OCS might be interested in a greater level of detail at the local level, OCS agrees with another commenter that this would require a "roll-up" of information from the EEs and would be burdensome.</p> <p>Change to MSP: for 12.2 and 12.3, changed wording to "how does the State ensure" that the eligible entities ets.</p>

Section 12 Individual and Community Eligibility Requirements

MSP	COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
12.2, 12.3	OFFICIAL: Paul Dragon	NJ	10	12.2 and 12.3 Income eligibility for general/short term Services and Community-targeted Services: We applaud OCS for the additions of these categories which recognize the important and practical application of CSBG funds in communities.	supportive	√
12.2, 12.3	OFFICIAL: Tikki Brown	MN	11	Should be removed. They address eligible entity level activities and community programming. State should report on their approach to ensuring eligible entities are in compliance with the income eligibility requirements. Each eligible entity might have a different approach to income verification and documenting appropriate service targeting. This question also asks for too much local level detail. If more information than 12.1 is needed, CAPLAW may be a resource to OCS in drafting any additional question(s).		See item 9.

Section 13
Results Oriented Management and Accountability System (ROMA)

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
13.3	OFFICIAL: September Ward	MI	1	It would be helpful if this question had more instruction.		training and technical assistance.
13.1	OFFICIAL: Paul Dragon	VT	2	13.1a If you selected ROMA above, please attach and/or describe the State's written policies, procedures, or guidance documents on ROMA: The State uses a ROMA framework within the annual Request for Work Plan and includes ROMA participation in its annual grant agreements with eligible entities. Is there a higher expectation for States to implement additional State-level policies and procedures on a national system which is heavily supported at that level? We hope that OCS will continue to recognize that small States can effectively implement CSBG by relying on and/or referencing the guidance available from OCS, NASCSP, Community Action Partnership, etc.		Agreed. The intent of the question is not to generate additional state-level policies where none is needed.
13.2	OFFICIAL: Paul Dragon	VT	3	13.2 CSBG National Performance Indicators: Our State requires all eligible entities to report on some NPIs and other NPIs are optional and to be based on the work of each agency. We hope that the intent is to continue to allow this appropriate participation in the National Performance Indicators.		Agreed.

Section 13
Results Oriented Management and Accountability System (ROMA)

MSP	COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
13.3	OFFICIAL: Barbara Mooney	PA	4	[mentioning how states support ees for ROMA may overlap with T/TA in section 8] will be difficult to write and difficult to analyze.		The intent of the question is to gather some basic information about state activities to support ees in implementing ROMA. The instructional note is meant to acknowledge that these activities are likely to include T/TA in order to reduce confusion and duplication. Change to MSP: in the instructional note for 13.3, changed "overlap" to "include"

Section 14 CSBG Programmatic Assurances and Information Narrative

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
14	OFFICIAL: NASCSP	DC	1	<p>NASCSP has concerns about the significant new reporting requirements in Section 14. Several questions in Section 14 (14.2, 14.3 a-d, 14.5) are clearly based in requirements of the CSBG Act. The Act requires descriptions of local agency activities for these Assurances. Other questions in this section (14.1 a-c), 14.4, 14.6) ask States to describe local agency activities not required by the Act. The Act only requires that States assure that local entities will meet those requirements. Other questions (14.7, 14.8, 14.11, 14.12) are yes/no questions that are consistent with the Act.</p> <p>NASCSP requests that OCS review Section 14 and modify the questions to reflect the requirements of the Act. Where the Act requires a description of local entity activities, it is appropriate to require such information in Section 14. Where the Act simply requires the State to assure that certain activities will be carried out, the MSP should only require a description of how the State will carry out that assurance (similar to current State Plan).</p> <p>The MSP does not properly acknowledge the distinction in the law between requiring States to assure certain activities will be carried out, and requirements in the Act for States to describe local agency activities. Therefore, the MSP requires States to collect and provide significant new information beyond the requirements of the Act.</p>	Endorsed: IW	<p>Several commenters indicated that some questions in section 14 requested information that would require a roll-up of local information. In particular, 14.1 a-c, 14.4, 14.6 ask about local activities and would require states to "roll up" information from local ee plans. Such a "roll up" would be technically burdensome, and is also beyond the scope of section 676(b) of the statute. The commenters state that the statute only requires a description of how the state would assure funds were used for certain activities or assure ees were doing certain things. Even taking into account assurance 676(b)(13), which requires states to describe how they will carry out the assurances, the MSP should not require a "roll up" of local activities.</p> <p>Change to MSP: Revised the wording in 14.1 a-c, 14.4, 14.6 and 14.9 to align more closely with the statute.</p>

Section 14 CSBG Programmatic Assurances and Information Narrative

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
14	OFFICIAL: Bill Brand	IA	2	<p>NASCSP has concerns about the significant new reporting requirements in Section 14. Several questions in Section 14 (14.2, 14.3 a-d, 14.5) are clearly based in requirements of the CSBG Act. The Act requires descriptions of local agency activities for these Assurances. Other questions in this section (14.1 a-c), 14.4, 14.6) ask States to describe local agency activities not required by the Act. The Act only requires that States assure that local entities will meet those requirements. Other questions (14.7, 14.8, 14.11, 14.12) are yes/no questions that are consistent with the Act. NASCSP requests that OCS review Section 14 and modify the questions to reflect the requirements of the Act. Where the Act requires a description of local entity activities, it is appropriate to require such information in Section 14. Where the Act simply requires the State to assure that certain activities will be carried out, the MSP should only require a description of how the State will carry out that assurance (similar to current State Plan). The MSP does not properly acknowledge the distinction in the law between requiring States to assure certain activities will be carried out, and requirements in the Act for States to describe local agency activities. Therefore, the MSP requires States to collect and provide significant new information beyond the requirements of the Act.</p>	same as NASCSP item 1	See item 1.
14.1	webinar: Rita Garza	TX	3	Can you provide examples of what you would expect to see in MSP 14.1a? Would it be information for each eligible entity?"		See item 1; the changes may make this section less complicated.

Section 14

CSBG Programmatic Assurances and Information Narrative

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
14.1a	OFFICIAL: Barbara Mooney	PA	4	<p>This is so very open ended. What do you envision? One document that would speak to how all the agencies in a state will address each purpose? Or a collection of documents from the local agencies? If the state must collapse the information from many agencies (as in states with 25 - 45 agencies), this will be an incredible burden, unless there are some drop downs that can be aggregated at the state level.</p> <p>As: 12 agencies in the state will provide job coaching for employment, 4 provide training programs for specific employment areas, 2 provide.... Etc.</p> <p>This seems like it would be difficult, then for the federal review of it all.</p> <p>If there was opportunity for individual agencies to respond, this could become a part of their work plan, and also a part of their report at the end of the year.</p>		See item 1
14.1a	OFFICIAL: Barbara Mooney	PA	5	<p>["Describe how CSBG funds"] is a good way to focus on CSBG only activities. Will have to be clear in directions that it is only CSBG utilization.</p>		OK
14.1a	OFFICIAL: Barbara Mooney	PA	6	<p>[Instruction to "Please include information about each programmatic purpose"]. What kind of information? Description of activity? Number to be served? Amount of CSBG \$ to be used?</p>		See item 1.

Section 14
CSBG Programmatic Assurances and Information Narrative

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
14.1a	OFFICIAL: Barbara Mooney	PA	7	["Emergency assistance"]: Would this be all emergency services except those for nutrition in 14.4? Other categories have been included in the national information survey, which were added due to requests from the field for other major areas that are indicators of well being. These categories include: housing, health, nutrition. Recent input has also identified a need for a distinction between "emergency assistance" and both disaster relief and stabilization. "Disaster relief and stabilization" is now being reported [in the IS?] as "emergency."	emergency	While the IS survey has captured specific information on services in the past, and we will continue to capture services info in the revised annual report in the future, OCS decided to just maintain the services language in the assurance at this stage in the MSP. Since we don't have the new services categories for the new annual report yet, this keeps it simple.
14.1a	OFFICIAL: Barbara Mooney	PA	8	Other categories have been included in the national information survey, which were added due to requests from the field for other major areas that are indicators of well being. These categories include: housing, health, nutrition.	emergency	see item 7.

Section 14 CSBG Programmatic Assurances and Information Narrative

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
14.1a	OFFICIAL: Barbara Mooney	PA	9	It was the consensus of those who provided input that all of the categories, taken together, represent activities needed to assist low income families and individuals as they move toward self sufficiency. Self sufficiency should only be included as a category if it is clear that it refers to delivery systems that bundle services or that provide a set of services that cross categories. If you clearly define [self sufficiency] here, then you can ask for more detailed information about individuals/families in this category. (knowing that there will be individuals/families that are in this category who are served with other than CSBG funding (may use Head Start, HUD, other funding for self sufficiency programs. Anyway, could ask for client characteristics, kinds of services received and outcomes achieved.	self sufficiency	See item 7.
14.1a	OFFICIAL: Barbara Mooney	PA	10	Would [14.1a, 7 programmatic purposes] include a projected number to be served in each category? Or a statement that it is a community level project?		See item 1.
14.1a	OFFICIAL: Tikki Brown	MN	11	We see that the areas highlighted (I through vii) match the CSBG Act, but our first question was why these don't align with the CSBG-IS Section E categories (which include health, nutrition, and linkages, in addition to those listed.)	alignment w/Sec. E	See item 7.

Section 14 CSBG Programmatic Assurances and Information Narrative

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
14.1b	OFFICIAL: Barbara Mooney	PA	12	[Describe] for each entity or for all entities. See note above (under 14.1a).		Change to MSP: Changed the wording to indicate that this relates to just CSBG, and the assurance is not a local "roll-up" but focuses on the State assuring funds will be used for youth activities (see item 1).
14.1b	OFFICIAL: Barbara Mooney	PA	13	[youth activities] includes other funding? Not just CSBG? The activities of the entity would include activities funded by other sources.		see item 12.
14.1c	OFFICIAL: Barbara Mooney	PA	14	[Describe] same question as above.		Change to MSP: Changed the wording to indicate that this relates to just CSBG, and the assurance is not a local "roll-up" but focuses on the State assuring funds will be used for youth activities (see item 1).

Section 14 CSBG Programmatic Assurances and Information Narrative

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
14.1c	OFFICIAL: Barbara Mooney	PA	15	Other community level activities: [quote from the CSBG Act 672(2) Purposes and Goals A and C.] Or are these adequately covered in section 14.3 below? Is "innovative and effective community-based approaches" from 672(2)(c) the same as 14.3d?		We are only including information in section 676(b) of the statute, unless there is a different decision about types of services to include in 14.1a. See item 7.
14.3d	OFFICIAL: Barbara Mooney	PA	16	[Describe how the local entities will use funds] - The CSBG funds only?		Change to MSP: clarified that these are 90 percent funds.
14.3d	OFFICIAL: Barbara Mooney	PA	17	[fatherhood] as a direct quote from the Act this is ok - but the focus on fatherhood programs is dated and may not be innovative in 2015.		Leave in b/c statutory. No change to MSP.
14.10.	OFFICIAL: Joan A. Lee, Ex. Dir., CENLA CAA	LA	18	Reference is made to this item corresponding with Section 11.3 of this plan which does not appear to exist. Is there another area this should correspond to under Section II - Eligible Entity Tripartite Board (11.1, 11.2 or 11.3) on page 21?		OK
14.2	OFFICIAL: Barbara Mooney	PA	19	If the answer is the same here as 7.10 and 7.11, why is it duplicated here?		clarified that this will be hyperlinked; no need to duplicate info
14.3a	OFFICIAL: Barbara Mooney	PA	20	Again [is the response to this question for] each entity or all the entities? Can state say: 12 agencies use a system like this and 8 use a system like that...		training and TA issue.

Section 14 CSBG Programmatic Assurances and Information Narrative

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
14.3a	OFFICIAL: Barbara Mooney	PA	21	[Is this description for services provided or coordinated] only with CSBG \$?		See item 1.
14.3a	OFFICIAL: Barbara Mooney	PA	22	Could [CSBG Act 672(2) Purposes and Goals B, D, E] go here also? To help eligible entities describe the service delivery system?		See item 15.
14.3a	OFFICIAL: Barbara Mooney	PA	23	[To "describe the service delivery system] additional guidance and perhaps a format could be provided. This could be a link to the Theory of Change work. Also could there be a drop down for entities to say they do bundled services?		Since the new annual report / ROMA next gen work is not complete, we can't integrate at this point. Also, it may be more appropriate for the annual report.
14.3b	OFFICIAL: Barbara Mooney	PA	24	[describe] as above. [description for each agency or all agencies?]		See item 1.
14.3c	OFFICIAL: Barbara Mooney	PA	25	Coordination isn't the same as "broadening resource base" so I think both need to be addressed. But how is the different from 14.1c?		Tried to distinguish in 9.4 and 9.5: one is a global state assurance and the other is an ee activity.
14.3	OFFICIAL: September Ward	IA	26	Michigan asks the question in 14.3a in the annual Community Action Plan to each eligible entity, but we do not roll this information up into one summary. This could take a lot of time.		Agreed. See item 1.
14.4	OFFICIAL: Barbara Mooney	PA	27	[starvation and malnutrition] Would agencies be directed to include descriptions of routine food distributions (people get food weekly or monthly) as well as those targeted to emergency services?		Let's discuss; see item 7.

Section 14 CSBG Programmatic Assurances and Information Narrative

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
14.5a	OFFICIAL: Jennifer Dreilbis	NE	28	14.5a. Does the state intend to meet this assurance by describing CSBG employment and training activities as part of a WIOA combined state plan, as allowed under the Workforce Innovation and Opportunity Act? Yes No How is this answered in states where CSBG is far removed from access to the WIOA?		Would answer no and describe involvement.
14.5b	OFFICIAL: Jennifer Dreilbis	NE	29	14.5.b If No to 14.5a describe how state will meet this assurance How do states that do not work closely with their WIOA partners answer this question?		Training issue.
14.5	OFFICIAL: Barbara Mooney	PA	30	[Employment and training] - These could be sub sets of 14.3 And also refer back to 9.1-2 - is it really needed to be repeated?		trying to hyperlink appropriately to avoid duplication.
14.6	OFFICIAL: Jennifer Dreilbis	NE	31	14.6 Coordination with energy crisis intervention (LIHEAP) and between anti-poverty programs in each community How do states handle this question when the programs are isolated from each other, ie they do not share program information across state programs?		It is a required assurance.
14.6	OFFICIAL: Barbara Mooney	PA	32	[LIHEAP] Again, is it necessary to have separate section for LIHEAP? Could be sub set of 14.3b. Is this also in assurances?		Agreed. Tried to integrate with 14.1a. Need to confirm placement and links.
14.6	OFFICIAL: Tikki Brown	MN	33	Add assurance-16		Unclear what this comment means?

Section 14 CSBG Programmatic Assurances and Information Narrative

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
14.9	OFFICIAL: September Ward	IA	34	Michigan asks the question in 14.3a in the annual Community Action Plan to each eligible entity, but we do not roll this information up into one summary. This could take a lot of time.	(same wording as question under 14.3, but perhaps means to apply it to 14.9 too.	See item 1.
14.9	OFFICIAL: Barbara Mooney	PA	35	[faithbased organizations, charitable groups, community organizations] Could be a sub set of 14.3? Ors this speak to partnerships? Goal 4 NPIs.		We are reverting to statutory language and order of items to keep it simple.
14.9	OFFICIAL: Barbara Mooney	PA	36	[describe how] For what purpose?		See item 1; also changed language so this isn't a "roll-up" of ee activities.
14.9	OFFICIAL: Tikki Brown	MN	37	Very prescriptive. The list of local partnership is typically very extensive, and is already reported on numerically in the annual report. What would be provided here would by nature of the breadth of the breadth of the activity need to be high level overview. Make that clear.		See item 36 (and 1)

Section 14 CSBG Programmatic Assurances and Information Narrative

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
14.1, 14.3, 14.4, 14.5	OFFICIAL: Paul Dragon	VT	38	14.1, 14.3, 14.4, 14.5, Programmatic Assurances and Information Narrative: Our State office requires each eligible entity to respond to a robust Request for Workplan framed on the ROMA cycle, where each entity responds specifically to each of the questions in this section. The intent of OCS is not clear in Section 14. Would OCS intend that the State CSBG Office include the information supplied by eligible entities in their annual plan in Section 14 or even attach each eligible entities' plan? In either case, it seems that the provision of the State's detailed Request for Workplan and a narrative description of process for collecting this information would adequately meet OCS's need to assess the proper performance of the functions of our agency, and would have more practical utility than OCS reviewing the community assessment and annual plan for each eligible entity.		See item 1.
14.10.	OFFICIAL: Barbara Mooney	PA	39	[tripartite board representation] Why pre-populate? Seems like duplication.		clarified the hyperlink.
14.11	OFFICIAL: Gabriella Teh	DC	40	Clarity needed as to whether, if answering yes, is supporting documentation required?		Supporting information is not required.
14.11	OFFICIAL: Barbara Mooney	PA	41	[Community Action Plan] Maybe clarify that this is (or is not) a plan for use of CSBG \$ and would therefore not be (or could be) the same as an agency wide strategic plan (covering all activities using all funding resources)		training issue.
14.11	OFFICIAL: Barbara Mooney	PA	42	[You may upload additional information and/or community action plans] Community action plans from all the entities? Maybe this could be combined in some way with the information in 14.1a about the way the different purposes are addressed.		clarified that there is no need to upload plans; it's a yes/no question.
14.12	OFFICIAL: Barbara Mooney	PA	43	ROMA - is this duplication of information from 11.6?		Yes, hyperlink to info in section 13.

Section 14
CSBG Programmatic Assurances and Information Narrative

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
14.12	OFFICIAL: Barbara Mooney	PA	44	What kind of supporting documentation do you envision?		clarified that there is no need to upload plans; it's a yes/no question.

**Section 15
Federal Certifications**

MSP	COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
1			1			

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
Acct. Measures: CAP	DC	1	10. Measure 1Fa. The measure should include an element that includes response time back to the States when there are outstanding issues related to the submitted State Plan. The current language related to review and acceptance does not adequately address OCS' expediency in seeking feedback on plans that do not meet a level of acceptance. It is recommended that a 15 working day response to states with submitted state plans that have outstanding issues be included.	1Fa	We believe a 15 day response time element is too stringent, and that the measure as it stands will provide useful accountability information. However, OCS has not made a final determination.
Acct. Measures: NCAF	DC	2	1Fa: we believe that the proposed measure is not an appropriate indicator of quality in the federal response to state plans. The proposed standard of success is quick acceptance of the state plan rather than prompt review and response to a state plan. As written, F 1a pressures OCS to accept plans that may be incomplete. We urge the OCS to consider a more precise performance target that would incentivize both responsive federal oversight and complete, effective state plans by aiming for prompt Office of Community Services response to submitted state plans including interaction through various stages of state's initiative to complete and improve its plan. For example: "X % of state plans have received a review and response within 30 days, including any requests for additions or changes AND, 100% of state inquiries regarding a state plan have received a response within 15 working days."	1Fa	See item 1.
Account measures: Tikki Brown	MN	3	1Fb. Timeliness will likely be included in the "quality of feedback provided about the State plan." In the past, we have had to contact OCS numerous times to just find out whether or not our plan was approved.	1Fb	see items 1 and 2

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
Account measures: Verna Best	NC	4	1Sb, 2Sb, 3Sb, 3Sd and 7Sb according to footnote 3 are designed to measure eligible entity "satisfaction" which may be skewed especially for agencies having difficulty with compliance. Likewise, this may be the issue with Grantee Satisfaction as referenced in 8F.	1Sb, 2Sb, 3Sb, 3Sd and 7Sb; 8F	Noted.
webinar: Jennifer Dreibelbis	NE	5	Based on this information are we no longer able to do 2 year state plans? Insead we would do annually?	2 year plans	To be determined.
webinar: Steven Milburn	MO	6	Is this still a two-year plan?	2 year plans	See item 5.
webinar: Diana Gravett	AZ	7	Our state has in place an approved two-year plan for FFYs 2015-2016. We will be making minor amendments involving program narratives, expenditures and budget allocations. Will we need to enter our Plan to make the amendments via OLDC, or can we submit a paper amendment?	2 year plans	See item 5.
webinar: Rita Garza	TX	8	What is the process for States that submitted 2 year State Plans?	2 year plans	See item 5.
OFFICIAL: Jennifer Dreilbis	NE	9	2Fa. This will greatly impact the state's ability to get subgrants, contracts and funds out in a timely manner.	2Fa	Should be OK. No different than current practice.
webinar: Karen Quackenbush	UT	10	If I understand correctly, States that submitted FY2015-2016 plans will be to enter "certain critical information" as an update...could you please elaborate? Will updates need to go through the same process as a new plan?	2-year plans; FY2016 amendments	See item 5.
webinar: Josiah Masingale	CO	11	Just to verify...if a State just submitted it's 2-year plan this past year (9/1/14), the State will still be expected to provide and "update" by 9/1/15 on MSP principles that were not addressed in the 9/1/14 State Plan?	2-year plans; FY2016 amendments	See item 5.

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
webinar: Jessica Rochester	MN	12	If we submitted a 2 year State Plan. How do we make the adjustments based on this new State Model Plan (i.e. FY 15 - FY 16 State Plan)	2-year plans; FY2016 amendments	See item 5.
Acct. Measures: NCAF	DC	13	3: As noted above we believe there is a fundamental performance requirement for consistent and informed federal oversight expressed through monitoring as well as in providing technical assistance. We recommended adding this measure: Federal personnel apply the regulations and policies in a uniform and consistent manner as set forth in written policies when they are advising or monitoring the programs of grantees	3F; related to NCAF item 51	We believe a personnel and consistency measure is not necessary; we will get feedback on personnel through the ACSI state survey.
OFFICIAL: Jennifer Dreilbis	NE	14	3Fa. This will be an improvement over practices in the past and a great goal to achieve.	3Fa	√
Acct. Measures: NCAF	DC	15	3B we believe the draft allows OCS 6 months to initiate a state corrective action plan, an excessive amount of time. We believe the intent of the draft may be to allow 6 months from first federal requests for change or improvement through the process of determining if conditions require a corrective action plan despite attempts to make fixes without one. In some serious cases, prompt creation of a plan is warranted. We recommend the standard be: a corrective action plan is offered to the state within 30 days and the OCS is expected to respond to state amendments to the corrective action plan within 15 days until it is completed until it is accepted by both.	3Fb	We believe a 6 months timeframe will be a useful target and that a more restrictive time frame would not necessarily be more productive.
OFFICIAL: Jennifer Dreilbis	NE	16	3Fb. As with 3Fa, this will be an improvement over practices in the past and a great goal to achieve.	3Fb	√
Account measures: Tikki Brown	MN	17	3Fb. The proposed six month time frame seems arbitrary. It will depend on the activity, and should be negotiated between OCS and the State based on what needs to occur.	3Fb	see item 15.

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
Account measures:Tikki Brown	MN	18	3Fe. Use consistent language throughout, so replace "audit" with "state assessment."	3Fe	ask assessment team?
Acct. Measures: CAP	DC	19	Measure 5F. The language should clarify that 100% of the organizational standards need to be met for an eligible entity to be found in compliance. The draft language refers to "x number of States in which x percent of assessed eligible entities in the State met meeting State-adopted organizational standards". As noted above in comment 7, inserting additional language to read "x percentage of assessed eligible entities in the State met (insert ALL or 100% of) the State-adopted organizational standards". IM 138 conveys the need for all eligible entities to meet all of the state established standards, so reiterating this in the Model State Plan would add clarity.	5F	Change to MSP: inserted "all of" into measure and removed "assessed", as in 6Sa.
OFFICIAL: Jennifer Dreilbis	NE	20	5F. This goal is confusing and does not measure the federal entity's ability to meet accountability. It is not clear what federal accountability is met with this measurement as it is written.	5F	This is a roll-up of the state measure 6Sa Training issue.
Acct. Measures: Gail Hedges, IL	IL	21	The CSBG IS is an agency-wide report, and the State plan is based on CSBG. Because not all programs are in the same office as CSBG, it is likely that the CSBG Office will have little input or control over the planned performance of another program. CSBG can provide broad training and technical assistance, but the ultimate decisions are held by the each program. Further clarification is needed to fully understand the impact of the measure.	5S(i)	Annual report is required; state must be accountable.

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
Account measures: Verna Best	NC	22	It is imperative for OCS to be explicitly clear on expectations/instructions for required reporting as outlined in 5S as currently there seem to be disconnects in OCS's interpretation of reporting categories in relation to instructions/definitions for reporting.	5S	need more information about the question; however, we did simplify measure 5S, collapsing items (i) and (ii). Change to AM 5S(i) and (ii): These two measures now read: "5S. The State submitted to: i. OCS the State's Annual Report by the OCS-established deadline; "
Account measures: Verna Best	NC	23	Training and technical assistance is often considered synonymous. Since it is delineated in 6F, it may be helpful to define each.	6F	training and TA issue.
Acct. Measures: NCAF	DC	24	6Fd: A performance standard measurement should be whether OCS provides good training and technical assistance. As noted above, we recommend accountability measurement regarding the training of federal personnel "The [OCS/state] personnel have demonstrated the knowledge skills and ability to administer all the requirements of the CSBG and to advise [grantees/subgrantees] on good practices"	6Fd	See item 13 as well.
Acct. Measures: NCAF	DC	25	The similar concern under 7F is that the indicator of a standard of performance is not stated: a good alternative would be: "OCS provides timely, clear communications about program requirements and opportunities to its state and local network partners."	7F	These types of questions will be in the survey.

General Comments

COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
Acct. Measures: NCAF	DC	26	We believe the inclusion of number 8F, which sets a target for customer satisfaction, is essential to making the entire accountability system effective. As noted, we believe the exact same measure should be applied to state.	8F and State measures	Agreed. Added ee satisfaction measure 8S.
Acct. Measures: CAP	DC	27	Add 8S. Grantee Satisfaction-By 20xx, the state achieves an overall grantee satisfaction score of "x" (TBD). This addition will align with the Federal Measure 8F.	8S	see item 26.

General Comments

COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
Acct. Measures: NCAF	DC	28	<p>General Recommendations: We have two suggestions we believe apply to strengthening several sections of both the state and federal measures. After our discussion of these two issues that touch the draft in multiple places, we will list comments on the proposed standards in order of the draft.</p> <p>1. We suggest clarifying the subjects about which agencies or states will be surveyed. A good model for expressing the standard that will be assessed by the respondents answering the survey measure 1Fb. It says states will be asked about improvement in OCS grant management services and it then lists four dimensions of good performance in delivering such services [clarity, ease and timeliness and high quality feedback]. Survey administrators will ask respondents to consider those dimensions [and perhaps they will ask about specific elements of 'quality'] so that answers are focused on experiences which are important to success; such responses can result in specific and actionable guidance to the federal office. By contrast, the measures that will be part of the survey are set forth not at all or only vaguely in the following items: 2Sb, 3Sd, 7Sb and 2Fb, 6F and 7F.</p> <p>Recommendation: We suggest OCS's final guidance re-state the expectation for performance of the selected task along with the expectation that the performance quality is always being "improved". [The latter is already set out in each of these survey items] Without a standard like the ones mentioned in 1Fb, those writing the Survey questions are asking the question "Is the State /OCS doing better in general on [planning, or managing or whatever the general topic is]?" The answers will not be focused enough to give the state or OCS guidance on what worked or did not. Further, these satisfaction survey items should invite a scaled response, not a yes/no. For example Rate how satisfied you are with the OCS timeliness of release of funds on a scale of 1-5? There are many valid ways to do that, and we offer some examples at each item listed below in order.</p>	Account. Measures	See revisions to appendix 4 in the IM on accountability measures.

General Comments

COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
Acct. Measures: NCAF	DC	29	<p>We find one a serious omission from both the state and federal accountability measures: there is no standard for knowledge, skills and abilities of the federal or state staff nor any related measurement of whether there exist appropriate training and clear operational materials for the personnel. The CSBG is unlike many larger federal because it operates primarily through non-profit organizations; the vast majority of eligible entities are nonprofit organizations while about a quarter are units of local government. Many federal and state civil servants have not had experience managing grants to private sector non-profit organizations. Further few other programs with similar purposes have the flexibility at the local level that is the core identity of CSBG. Thus, CSBG management calls for expertise that is not within the experience of many seasoned public administrators. Indeed, in the past OCS and individual state offices have from time to time gone through periods when they lacked enough personnel with knowledge of procedures, requirements and best practices. We recommend addition of an accountability measure for both federal and state levels that measures whether they have provided clear operations manuals and procedures and good training on their use. The standard should include having a method in place for verifying that their personnel understand the substance of programmatic content and best practices and rules related to community action and the Community Services Block Grant administration. Related to a standard for personnel knowledge skills and abilities is the process for applying those assets: uniform procedures for applying clearly- defined standards, regulations and policy. An important accountability standard is the implementation of a single set of practices for monitoring and evaluating and improving program delivery and operation.</p> <p>Recommendation: Suggested language applicable to both levels: The [OCS/state] personnel have demonstrated the knowledge skills and ability to administer all the requirements of the CSBG and to advise [grantees/subgrantees] on good practices [Federal or State] personnel apply the regulations and policies in a uniform and consistent manner as set forth in written policies when they are advising or monitoring the programs of [grantees or subgrantees]</p>	Account. Measures	See item 13.

General Comments

COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
Account measures: Adrienne Rolka	CA	30	<p>The IM is unclear about the nature of the State-specific reports. Concern: Without being clearly defined, the CSBG Network will be unable to account for the execution of the State-specific reports. Whereas other mechanisms/tools for potential performance analysis (i.e. State plan, annual reports, ACSI survey) are mentioned several times throughout the IM, the State-specific reports are only referred to in one section of the IM which reinforces the concern that the State-specific reports seem to be an underdeveloped mechanism requiring further definition and integration into the IM. Suggestion: A clear definition of what the State-specific reports will contain (ex. The State-specific reports will provide a comparison of the states' planned performance from their State plans versus their actual performance as reported in the states' annual reports) increases the CSBG Network's ability to hold one another accountable for the implementation of the State accountability measures.</p>	Account. Measures IM Implementation	See item 22; revised 4S(i) and (ii) for clarity.
Account measures: Adrienne Rolka	CA	31	<p>The IM expects states to communicate their performance data to CSBG eligible entities. Concern: Leaving it up to states to share their performance data allows states determine how transparent they want to be regarding their own performance which will result in inconsistent accountability across the CSBG Network. Suggestion: By OCS requiring states to share their State-specific reports or by OCS directly sharing State-specific reports with CSBG eligible entities, accountability and transparency will be consistent across the CSBG Network and carry more weight as values our Network aims to uphold.</p>	Account. Measures IM Implementation	The measures under 4S will create this accountability for States to report back to ees. It is more appropriate for States to communicate with ees than for OCS to do so.

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
Account measures: Adrienne Rolka	CA	32	<p>The IM is unclear how OCS will communicate progress on State accountability measures through the OCS website and by other means.</p> <p>Concern: Without details on what specific information will be communicated (i.e. the ACSI surveys, State-specific reports), the IM, as guidance on the implementation of the State accountability measures, does not ensure accountability.</p> <p>Suggestion: Specifying the details of what information will be communicated through the OCS website and by other means regarding the State accountability measures provides the appropriate amount of guidance in the IM for the CSBG Network to be accountable one another and to CSBG stakeholders.</p>	Account. Measures IM Implementation	see 30 and 31; the ACSI survey and accountability measures reports are under development so it would not be useful to add more detail to the IM.

General Comments

COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
Account measures: Adrienne Rolka	CA	33	<p>The tables regarding OCS and State Responsibilities (pg. 6-7) do not include enough details to implement the State and Federal accountability measures. Concern: Without an overview of the entire implementation of the State and Federal accountability measures as a performance management cycle, which includes all the accountability mechanisms/tools mentioned in the IM, the IM does not provide enough guidance to implement the State and Federal accountability measures as an enhanced framework for accountability and performance management at the State and Federal levels.</p> <p>Suggestion: If the tables regarding OCS and State Responsibilities (pg. 6-7) provided an overview of the entire implementation of the State and Federal accountability measures as a performance management cycle, as opposed to just the initial implementation timeline, the IM would provide enough guidance for the CSBG Network to not only be able hold one another accountable for implementation but also be able sustain the goal of accountability at all levels of the CSBG Network over time. We recommend that the timeframe of the tables, as representative of the State and Federal accountability measures as a performance management cycle, should, at a minimum, illustrate a full State plan application cycle and list where in relation to that cycle all the different accountability mechanisms/tools mentioned in the IM will come into play.</p>	Account. Measures IM Implementation	See item 32.
NCAF	DC	34	<p>We are supportive of and impressed by the new performance standards for federal and state government that are associated with these same parts of the Plan [see comment 44]. they will greatly improve te implementation of the Block Grant itself and the Plan process.</p>	Account. Measures; supportive	√

General Comments

COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
Acct. Measures: NCAF	DC	35	<p>In general we heartily applaud the Office of Community Services draft of the federal and state accountability measures. The National Community Action Foundation was active in securing the original congressional mandate for Community Services Block Grant network to initiate results-oriented and systematic information collection and management. Since that time, 1987, this network of more than a thousand community action agencies that our organization represents before Congress and federal agencies has worked with the states and OCS to refine measurement and reporting so they best measure the performance of program in accomplishing its goals and of the agencies in conducting their business. This CSBG network has been recognized by GAO and the Urban Institute among others for participating in and improving our comprehensive, ambitious outcome measurement system.</p> <p>Until now, however, only local agency work has been measured. This new policy recognizes the unique and essential roles federal and state management play in the success of Community Action and provide a systematic approach to measuring their quality and outcomes. It represents both a significant advance in our sector and a model that is applicable to many other sectors participating in government performance measurement and management systems.</p>	Account. Measures; supportive	√

General Comments

COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
Acct. Measures: NCAF	DC	36	<p>We applaud the OCS's recognition that all 3 levels of management responsible for implementing the community service block grant, federal, state and local are entrusted by law with measurable and essential roles in ensuring the Community Services program has maximum impact. Previous practice has been to measure the success of the federal agency and the state agencies by the program outcomes reported by the local Community Action Agencies. This practice, while standard under an older generation of government performance measurement, did not provide actionable information for federal or state managers about how their own operations contributed to or impeded the local results, thereby leaving unexamined the operational factors that contribute to the outcomes measured at the local level.</p> <p>The Office of Community Services initiative creates a model for performance measurement that can be precisely tuned to the assigned responsibilities of grantees and their federal program officers and administrators. Its result will certainly be to allow thoughtful consideration of factors that lead to an effective program as well as thoughtful consideration of alternatives when necessary.</p>	Account. Measures; supportive	√

General Comments

COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
Acct. Measures: NCAF	DC	37	OCS' decision to measure the results of federal and state performance and several dimensions of federal and state government accountability through the American Customer Satisfaction Survey, a third-party well-tested tool, is simply brilliant. The indicator 'satisfaction' is appropriate to reflect managerial and leadership effectiveness and responsiveness. The 'customers' or partners surveyed, the states in the case of federal accountability, the eligible entities in the case of state accountability, rely on their funding agencies' management performance as an essential input. It enables or impedes their timely performance of the tasks they set themselves. The conceptual framework shown in Appendix 1 is a well-considered and useful guide to framing the accountability items that will be the subject of the surveys and that will define the expectations for federal and state accountability; it neatly separates them from the program outcomes in low-income communities- outcomes that are the local agency results to be measured by the CSBG Results Measurement and Management system.	Account. Measures; supportive	√

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
Acct. Measures: NCAF	DC	38	Finally, and perhaps most important among the many strong qualities of this initiative, is the fact that each accountability measure includes elements that connect good performance directly to collaborative action. OCS has ingeniously intertwined the decisions, products and services of the federal and state managers with the manner in which they are formulated and provided. By asking all parties to demonstrate collaboration on plans, priorities, and the intelligent consideration of performance information in service of continuous improvement, this system ensures that the skills and specialized knowledge unique to each level of the CSBG system will act synergistically with the partners at every level. All parties to the program will become accountable not only to their superiors and the public but to one another. NCAF expects this re-alignment of incentives and rewards to be transformative in many regards.	Account. Measures; supportive	√
webinar: Jessica Rochester	MN	39	When will the assessment tools be created and available? [for account measures.]	accountability measures: assessment tool	Under development
webinar: Josh Summer	OH	40	Who is responsible for determining if a State has met an accountability measure and what are the consequences for not meeting an accountability measure? For example, the Model State Plan and related measure looks at the extent of eligible entity participation in developing the State plan and how well the plan reflects the input of the eligible entities. Who determines "what extent" and "how well" and what are the consequences for not meeting the measure?	accountability measures: how/who assesses?	OCS will develop an assessment tool similar to the tool developed by the organizational standards COE to assess org. standards.
webinar: Kathi Skoglund	SD	41	Is OCS going to administer this survey they talk about and then provide the results to state offices for use?	ACSI survey	Yes

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
webinar: Rita Garza	TX	42	Is OCS going to administer this survey they talk about and then provide the results to state offices for use?	ACSI survey	Yes
CAP webinar: Wilma McKay, FL state association	FL	43	The ACSI Survey will be provided to eligible entities to measure satisfaction with state performance. Will State Associations also receive the surveys?	ACSI survey	Not sure if state associations will also be surveyed.
Account measures: Adrienne Rolka	CA	44	<p>The IM does not mention if CSBG eligible entities will receive State ACSI survey results and if States will receive OCS ACSI survey results.</p> <p>Concern: The performance management cycle relies on continuous participation in surveys, but without the transparency of survey results to respondents, there is little value in participating - especially on a continual basis. Not sharing survey results with respondents also creates a gap in accountability to one another within the CSBG Network.</p> <p>Suggestion: Required sharing of survey results with respondents increases CSBG Network accountability and provides meaning and value for participation. Meaning and value for respondents secures a level of commitment from them that ensures long-term viability of the survey as a reliable data collection mechanism.</p>	ACSI survey	yes, the (newly numbered) 5S(iii) measure provides a timeframe by which the State must provide information back to the ees on the state's performance on the accountability measures.

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
Account measures: Adrienne Rolka	CA	45	<p>The IM is unclear when and how often the ACSI surveys will be administered to CSBG eligible entities and states and how long it will be before results are delivered to the intended recipients.</p> <p>Concern: The IM remains unclear how the accountability measures/performance management cycle will be implemented without a plan in place regarding when and how often OCS will be administering the ACSI surveys to CSBG eligible entities and states and how long it will take before results are disseminated.</p> <p>Suggestion: By clarifying the entire accountability measures/performance management cycle, the CSBG Network will be able understand how all the different accountability mechanisms will work together resulting in the Network's increased ability to hold one another accountable for implementation and an increased likelihood that the IM will hold up as guidance over time.</p>	ACSI survey	Not practical to provide this level of detail in the IM, as we are currently developing the tools and procedures.
Account measures: Adrienne Rolka	CA	46	<p>The IM does not mention targeted response rates for the ACSI surveys.</p> <p>Concern: Results of the survey cannot be considered valid without a certain level of response to the survey (i.e. statistically representative sample size).</p> <p>Suggestion: Setting statistically representative sample sizes for the CSBG eligible entity and state ACSI surveys validates the survey results which is necessary in order for the CSBG Network to use the survey as a reliable data collection mechanism.</p>	ACSI survey	This will be better explained in the revised appendix 4 of the IM on state and federal accountability measures.
webinar: Verna Best	NC	47	If much of what states will be assessed on will be what is proposed in the model state plan to be contained in the OLDC, is the plan to make the annual report a part of the OLDC?	Annual report	Yes

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
webinar: Jean Amison	FL	48	When referring to the Annual Report are you referring to the IS Survey?	Annual report	The IS survey has been considered the annual report in the past; going forward we will be requiring a specific Annual Report in a new format.
NCAF		49	With respect to the paperwork burden of reporting, we believe that the new Office of Community Services system for CSBG state plans promises to be a considerable improvement in efficiency, provided that the installation of the reporting system and its portal can be rolled out as expected in each state. If local agencies can be given access to the state's new system to enter the elements of plan data that depend on local budgets, plans and reports, the promised improvements can be realized, but barring that, there remains a substantial risk of error as state personnel must combine separate entities for local agencies' plans.	Burden	The MSP should not require data from the ees, so ee access will not be necessary.

General Comments

COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
NCAF		50	<p>Of course, the proposed system will be a considerable improvement over the present plan submission burden and should be approved with modifications suggested below. However, the estimated time for the collection and submission of data, 10 hours per state grantee, is as patently absurd as is nearly every estimate any federal department submits to [and generally has approved by] OMB regarding a proposed reporting form. The true figure for state managers alone is probably as much as 10 times higher. The time sent by local agencies should have been included in the estimate and each one is comparable to the state office burden. The estimate required by law is not only regarding the time needed to upload validated data into a central federal system; is the time needed to collect and prepare the information PLUS the data entry and should include the time spent by all parties.</p> <p>We make this observation for the record, even though we support the proposed change, because we are concerned that the federal government may not appreciate the considerable demand on CSBG funds that results from our local-state network's commitment to reports that provide accountability and transparency. These costs are largely directly attributable to CSBG requirements of law and regulation and are woefully underfunded.</p> <p>We urge the Office of Community Services to undertake serious study of the costs of managing the entire proposed planning, ROMA and reporting system and consult with the network about cost-saving modifications.</p>	Burden	<p>We are revising the burden estimate to include a more robust accounting of the planning that goes into the state plan, as well as the added training required to learn the new system in the first year.</p>

General Comments

COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
NCAF		51	<p>The proposed system, if implemented fully at all levels will certainly reduce the burden of time and the flaws resulting from repetitive data entry not only at the state level but among local agencies and for federal program staff.</p> <p>The capacity built into the system which pre-populates certain sections based on earlier entries contributes substantially to efficiency and should reduce errors. We understand that it will be possible for states to access their submissions for submission or modification- a feature which is essential and will increase responsiveness to changing circumstances, funding or regulation.</p>	Burden; supportive	√
NCAF	DC	52	<p>More Advantages of the Proposed Changes include new elements added to the plan will improve the manner in which it is developed, thereby raising the likelihood that each plan is realistic, operable and has set goals and expectations that are shared between the funding agency and he many organizations responsible for delivering the services and projects it lays out. Specifically, sections 3.3, 3.4, 4.2 and 7.6 all refer to state-local collaboration and contribute to a collaboratively developed, publicly reviewed blueprint for investments and activities that will improve CSBG's effectiveness in reducing poverty.</p>	collaboration; supportive	√
webinar: James Leary	NY	53	<p>Is it expectation for States to send these draft IMs to eligible entities or is this primarily for States to comment?"</p>	communication with ees	Anyone can comment; states are welcome to pass them along, or the ees will likely get informatio from other channels.

General Comments

COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
Account measures: Adrienne Rolka	CA	54	<p>The IM does not mention mechanisms for collecting and reporting on the Federal accountability measures.</p> <p>Concern: Without mechanisms to report planned performance versus actual performance there is no accountability. If what gets measured, gets done - than OCS having no means/mechanisms to report with, such as the states have in their State plans and annual reports, may result in no collecting and reporting of Federal accountability measures to the CSBG Network and stakeholders.</p> <p>Suggestion: No matter how simple in format, an annual OCS accountability plan (that sets performance targets for the Federal accountability measures) and an annual OCS accountability report (that compares OCS' actual performance on the Federal accountability measures versus the set performance targets) will ensure the goal of accountability at all levels of the CSBG Network.</p>	federal	<p style="color: red;">Do we need a federal measure that requires OCS to provide accoun. Measure info to the States, similar to 5Sa(iii)?</p>

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
Account measures: Adrienne Rolka	CA	55	<p>The IM is unclear who OCS will report to regarding the Federal accountability measures.</p> <p>Concern: Although the IM states OCS will communicate progress on Federal accountability measures to states and other stakeholders, progress cannot be made without first having results in which progress can be measured against and the IM does not state who will receive OCS's performance results regarding the Federal accountability measures. Without knowing who OCS will report performance results to there is a gap in accountability.</p> <p>Suggestion: Assuming that mechanisms are in place as suggested in Concern #7 (above: "The IM is unclear who OCS will report to regarding the Federal accountability measures"), OCS sharing the results of their performance with states and CSBG eligible entities increases accountability within CSBG Network and to one another by demonstrating the same principles of transparency and accountability that OCS is requiring of states and CSBG eligible entities.</p>	federal	See 54
Account measures: Adrienne Rolka	CA	56	<p>The IM is unclear how OCS will communicate progress on Federal accountability measures through the OCS website and by other means.</p> <p>Concern: Without details on what specific information will be communicated (i.e. the ACSI surveys, State-specific reports), the IM, as guidance on the implementation of the Federal accountability measures, does not ensure accountability.</p> <p>Suggestion: Specifying the details of what information will be communicated through the OCS website and by other means regarding the Federal accountability measures provides the appropriate amount of guidance in the IM for the CSBG Network to be accountable one another and to CSBG stakeholders.</p>	federal	See item 54; This information is under development so not practical to include more information in the IM.

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
webinar: James Leary	NY	57	When is it anticipated that a fillable draft model plan will be issued? That document would be extremely helpful to states that have to get moving with legislative hearings and public comment processes. Thank you for these webinars, they have been very helpful!	fillable version	provided on March 10, 2015.
webinar: Katie Castern		58	Since the model state plan won't be finalized until 6/30/15, is it safe to assume that the OLDC system won't be ready for states to enter their plans until July or August?	fillable version; final MSP availability on OLDC	Yes.
CAP webinar: Alan Burdick	HI	59	We're starting to draft our State Plan, using the MSP format, but we do not see any place where an ""automated"" state plan is available for our use. Where do we find it?	fillable version; final MSP availability on OLDC	See item 57
OFFICIAL: Jennifer Dreilbis	NE	60	Question- How will various parties review the content in the state plan if it is entered into an automated database (OLDC)? If the state plan is asked for by community members or legislature how do we get them access to the information?	fillable version; final MSP availability on OLDC	States can use the fillable version; in the future, can print draft from OLDC. Training issue.
Account measures: Bill Brand	IA	61	In general, the sum total of the requirements of the Draft IM, together with those of the CSBG Model State Plan and IM 138, represent unprecedented new requirements, expectations, and mandates for State CSBG offices. These new requirements are being placed on States with no new funding to support their implementation. Without some modifications, particularly in the area of State requirements to monitor all eligible entities for compliance with the Organizational Standards annually, successful implementation may not be possible, or other State responsibilities specifically required by the CSBG Act will suffer.	funding	See annual assessment response in section 6.

General Comments

COMMENTER	STATE	#	COMMENT	RELATES TO	RESPONSE
Acct. Measures: Josh Summers, OH CA Association	OH	62	<p>We were disappointed that the same level of accountability [as for organizational standards in IM 138] was not applied to the proposed State and Federal Accountability measures. In the draft language, the State Accountability Measures are designed to capture performance data that indicate how efficiently and effectively the State implements the activities described in the State plan and what impact the State's efforts have on the performance of local eligible entities. The measures look at characteristic such as timeliness, accuracy and stakeholder satisfaction. While OACAA agrees that these are important areas to measure, there doesn't seem to be a system to determine optimal efficiency or effectiveness, nor a mechanism (such as the TAP) to address deficiencies. Also, unlike with the Standards, it is not clear who is responsible for determining whether the reported measures are accurate. The use of the American Customer Satisfaction Index (ACSI) could be a useful tool for documenting the measures; however it is described as a self-assessment tool as opposed to an accountability tool. If for example, the ACSI showed a low customer satisfaction score over a period of years, there is no process for addressing the deficiency, other than reports to OCS. OACAA encourages OCS to consider systems such as a TAP or QIP in this situation, so that there is a third-party involved in holding the State accountable. Whereas the Standards outline a clear path towards termination or reduction in funding as a consequence for not meeting the Standards, there is no equivalent in the State and Federal Accountability Measures. Perhaps, this is an area where State Associations could be engaged as the success of the CSBG Network is dependent on effectiveness at the Federal, State and Local levels. State Associations can offer assistance to States in the same way they build capacity in CSBG-eligible entities.</p>	Gen	<p>The state and federal accountability measures are an important step toward creating a culture of accountability, transparency, and continuous improvement. While there may not be exact parallels to the TAPs and QIPs for state and federal offices that may not meet accountability measures, we believe that these procedures will create efficiency and effectiveness and improve performance of the Network.</p>
webinar: Katie Castern	WI	63	Thank you! This webinar was very helpful.	helpfulness of webinar 1	√

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
webinar: Jennifer Dreibelbis	NE	64	Thanks for this information, it is very helpful!!!!	helpfulness of webinar 1	√
webinar: Melissa Stanford	OH	65	Thank you!	helpfulness of webinar 1	√
webinar: James Leary	NY	66	Thank you! This has been very helpful in helping us prepare our 2016 draft.	helpfulness of webinar 1	√
webinar: James Leary	NY	67	Thank you for this webinar. It was very helpful.	helpfulness of webinar 2	√
webinar: James Leary	NY	68	Thank you for these webinars, they have been very helpful!	helpfulness of webinar 3	√
webinar: Jessica Rochester	MN	69	How will OCS help in the training needs for States needing further training regarding the Model State Plan outside of this webinar?	MSP training	OCS will provide training this spring/summer.
webinar: James Leary	NY	70	How will OCS help in the training needs for States needing further training regarding the Model State Plan outside of this webinar?	MSP training	see item 69
webinar: James Leary	NY	71	How will OCS address the further discussions/questions for States that were not able to attend the NASCSP conference?"	MSP training	OCS will provide further communication and training.
webinar: Cassandra Norfleet-Johnson	CT	72	Can information for section 3.1, 3.2, 3.4 be paste from word into the OLDC page or will the CSBG office be required to type the information into the text boxes	OLDC: cut and paste	can cut and paste
webinar: Jennifer Dreibelbis	NE	73	Since everything is automated for the most part what are we expected to have to present the plan to the public hearing and the legislative hearing. In the past, we gave draft copies of the entire plan to public and legislative HHS committee.	OLDC: sharable State Plan version	See item 60.

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
webinar: Patricia Swartz	NJ	74	How do you share the State Plan for comments when it's inputted into a database?	OLDC: sharable State Plan version	See item 60.
Account measures: Verna Best	NC	75	OCS should ensure that the Modernized State Plan is available in a printer-friendly format to support having the document available for access/review for all stakeholders and interested persons.	OLDC: sharable State Plan version	See item 60.
webinar: Kathi Skoglund	SD	76	and what 'other sources' are they referring to [in performance management adjustment questions]?	performance management questions	"Other sources" are at the discretion of the State. In addition, we have added, "such as the public hearing," to indicate that the public hearing is a possible and advisable "other source" of feedback to the state. Change to MSP: added in "such as the public hearing."
webinar; Melissa Stanford	OH	77	How can a state report improvements in eligible entity participation in state plan development accomplished in recent cycles -- if info not sought by OCS until after 1st use of OLDC model state plan?	performance management questions: timing	States do not need to include this information in the first year since they don't have it yet. The instructions in the MSP indicate which questions to skip in the first year.
webinar: Rita Garza	TX	78	If State is doing a State Plan for 2016 and 2107, for MSP question #10.14 the State would not answer it? Also when would the State report it in the Annual Report. Would it be in 2017 for the 2016 State Plan?	performance management questions; annual report	No need to report in the first year. See item 77.

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
Account measures: Adrienne Rolka	CA	79	The State Accountability Measures are trying to accomplish three different objectives: (1) compliance (whether the State performed the required activity or not), (2) quality improvement (how satisfied CSBG eligible entities are with how the State performed a required activity) and (3) performance improvement (how well the State performed a required activity in terms of quantifiable measures). But those objectives are unclear because the measures related to each objective are all mixed together. We suggest considering regrouping the measures by objective.	State measures	These distinctions will be evident in the ACSI survey.
Account measures: Adrienne Rolka	CA	80	We believe it may be misleading to state there are 13 measures, when several measures are broken down into sub-measures that have different objectives. When taking into account sub-measures, there are 25 different measures in total. We suggest	State measures	Noted, we will determine final number. The idea is that some measures have sub elements that aren't separate measures.
Account measures: Adrienne Rolka	CA	81	When considering measures in terms of objectives, they are a disproportionate amount of compliance measures (which are essential standards) in comparison to quality and performance improvement measures. There are 11 compliance measures, while there are only 7 quality improvement measures and 7 performance improvement measures. To meet the network goal of accountability and performance management across the CSBG Network, we suggest increasing the number of performance improvement measures by taking some of the compliance measures one step further. For example, 1Sa(ii) could measure the # of eligible entities that were involved in developing the State plan. Or, another example, 3Sa could measure the % of discretionary funds used in accordance with the strategy outlined in the State plan.	State measures	These measures were developed in collaboration with a CSBG Network workgroup. While they may not be perfect, we believe that they will serve to improve accountability and transparency, as well as spur continual performance improvement.

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
OFFICIAL: Joan A. Lee, Executive Director, CENLA CAA	LA	82	After careful review of the revised Model State Plan draft, I have determined that it follows a logical order, has ample content, and it appears to have a functional user-friendly interactive format. However, I have made notation of the following items for your consideration:	supportive	√
OFFICIAL: Jennifer Dreilbis	NE	83	Overall I like the set up of the model state plan. I especially like that the last question in each section tends to be how is the state going to adapt its plan to take into consideration analysis and feedback from the previous year to improve next year. It requires states to continue to adapt our plans based on analysis and feedback. States have required this of agencies (eligible entities) for years, now we are held to the same standard. The layout works and I think it is easier to fill out than previous state plans that were narrative heavy and information got lost in the vague headings.	supportive	√
webinar: James Leary	NY	84	Will NASCSP and/or OCS post Q&As from webinars?	webinars	No, but we did post the webinars themselves so you can hear the Q&As.
webinar: Sarah Phillips	VT	85	It would be great to have a list of any specific items OCS would like feedback on - e.g., she mentioned \$ or % of \$...		OCS provided guidance in the Dear Colleague message at the start of the 60 day notice period.
webinar: Jessica Rochester	MN	86	Can we get the PowerPoint for part III ahead of time for the next webinar?		n/a

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
OFFICIAL: NASCSP	DC	87	NASCSP members support the proposed changes to the state plan submission process and content. However, we urge OCS to consider our feedback, particularly as it related to the demands the revised Model State Plan may place on CSBG funding and staff capacity, and concerns about content and clarity in its current format. An overall concern for NASCSP is that the linking of the Model State Plan to the State Accountability Measures seem to take away some freedom to administer the grant as each state needs within the confines of its rules and regulations, the capacity of its eligible entities and the needs of its citizens. It is useful for OCS to bear that in mind as they establish requirements, timeframes and due dates for those programs, many States will face large cost burdens associated with creating new collection and reporting systems to accommodate the new standards and required performance measures.		OCS is working closely with NASCSP and the CSBG Network to provide support and guidance in implementing the new CSBG performance management system.
OFFICIAL: CAPLAW	MA	88	Various Sections. Certain sections (such as 7.6, 7.12, 8.3, and 9.6) require states to make comparisons to past plans. OCS should clarify which past plans - i.e., any past plan? the past three years' plans? the past year's plan?		Training issue.

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
Account measures:Tikki Brown	MN	89	We strongly encourage OCS and State to track and acknowledge the costs associated with implementing the new state and federal accountability measures (as well as the organization standards for local eligible entities). We do not believe the current 5% administrative funding provided to MN (just under \$400,000 annually with 36 eligible entities) will allow us to achieve what has been proposed. For example, monitoring against the Organizational Standards every year for every eligible entity would place a significant strain on our capacity, and also contradicts the three year monitoring requirement in the CSBG Act. We believe this pressure on administrative budgets and capacity threatens our ability to do the high impact work we believe adds higher value.		See annual assessment response in section 6.
Account measures:Tikki Brown	MN	90	The IM doesn't address the consequences for those (states and the federal government included) that don't meet accountability measures. We think this should be addressed.		See item 62.
Account measures:Tikki Brown	MN	91	The IM refers (on the top of p. 3) to 13 state accountability measures. We count 17 measures at least (not including all the sub-level measures.)		See item 80.
Account measures:Tikki Brown	MN	92	The requirement that states use a nationally administered survey for the customer satisfaction is burdensome and duplicative for MN. Since the mid-1990s, the MN OEO has used a customer satisfaction survey developed by Wilder Research Center to solicit coordinated feedback from all of our grantees, which include Community Action grantees, but also homeless and emergency food grantees. If States have their own system already in place which covers the same content as the national survey, they should be allowed to use it and not required to duplicate efforts, which puts an extra burden on local eligible entities in having to complete multiple surveys. States and local grantees should not be penalized for already having systems in place.		technical assistance to MN.

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
Account measures:Tikki Brown	MN	93	Page 4 of the IM references more frequent data collection "on a very small number of measures." We are concerned that we will not have the capacity to implement additional reporting requirements without federally-provided automated systems for data collection and at current levels of 5% administrative funding. Currently, we have to re-enter all of the CSBG-IS data for our 36 eligible entities on an annual basis, plus coordinate all the data cleaning efforts, analysis and submission. This is time intensive work that stretches our capacity <i>at current levels</i> of funding and reporting frequency. If the federal government plans to require more frequent reporting, providing a web-based system that eliminates the need for double entry of data is essential.		Under the CSBG data cooperative agreement, the grantee will provide support and training to states.
Account measures:Tikki Brown	MN	94	Requiring states to provide detailed "planned performance" information on a 2-year state CSBG Model State Plan may be difficult. It is difficult to anticipate planned performance 2 years out. Further, it is the nature of a block grant that States have flexibility and authority in administering the CSBG. We recommend that OCS pay close attention as to whether or not this activity yields useful, actionable information. If it does not, this should be abandoned.		OCS has collaborated closely with the CSBG Network to develop the elements of the CSBG performance management framework. The MSP is a critical implementation tool and states must use it whether they submit one or two year plans.
Account measures:Tikki Brown	MN	95	In order to be ready to incorporate the new annual report CSBG-IS forms, States and local eligible entities must have finalized forms no later than September 1 (prior to the beginning of the new fiscal year on October 1) to ensure adequate time to establish data collection systems. If this is not possible or realistic, implementation of these requirements should be delayed.		OCS will work with the CSBG Network to implement these new forms as effectively as possible.

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
Account measures: Tikki Brown	MN	96	Page 5 of the IM references "the OCS website and other means, as appropriate" for communication of State progress on accountability measures. Are there examples of other federally-funded programs where this is successfully happening? It would be helpful to see such tangible examples if there is.		training and ta issue.
Account measures: Tikki Brown	MN	97	Consider aligning the Federal accountability measures to the State ones with respect to Communications <i>and Linkages</i> (add "linkages"). One of the most important things the network benefits from is leverage linkages at all levels: local, state and federal. For example, OCS's recent linkage work with the White House Rural Council has potential for benefitting the communities and low-income people that the Community Action network serves. Let's document and encourage the federal progress here, as we do with local and state activity.	federal	Under development
Account measures: Verna Best	NC	98	It is requested that OCS acknowledge the need for ongoing training and support to ensure states are able to meet timeframes (which may need to be extended) for State Plan submission given the multiple levels of review such plans often undergo at the state level in preparation for approval and submission.		Agree.
OFFICIAL: Ditzah Wooden-Wade	MA	99	Additional significant staffing strain in managing the performance management & measurement changes for a state that oversees both the CSBG & LIHEAP Block Grants using the same staff.	burden	see item 50. We are increasing the burden estimate.
OFFICIAL: Patricia Swartz	NJ	100	The estimate of 10 hours to complete document underestimates the amount the time required to complete the instrument, not only by the State, but also by the eligible entities that will be submitting information to the State for inclusion in the plan.	burden	See item 50.

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
OFFICIAL: Patricia Swartz	NJ	101	The New Model State Plan will not be finalized by the Federal government until late spring at the earliest. Not only is the format of the model plan new, but a new on line submission process is being implemented. The Plan incorporates the new Organization Standards for eligible entities, and accountability measures which are still in draft form for States and OCS. Requiring submission by September 1, 2015 is unrealistic, in view of the draft nature of the plan format, accountability standards, and submission process. Have concerns with the timing for the required public and legislative hearings	timing	OCS will be providing extensive training and TA. OCS has been messaging to the field the need for States to continue on with their usual state plan development process; OCS provided the draft version of the state plan in a Word document.
OFFICIAL: Patricia Swartz	NJ	102	Need a definition section: a. 9.6 "Communication Plan"; b. 10.5 "serious deficiency" c. 10.5 "Quality Improvement Plan" d. 11. "Corrective Action Plan" and Quality Improvement Plan e. 13.2 "self-sufficiency", "family stability", "community revitalization"		OCS has addressed these issues separately in each section. Several terms have been removed.
OFFICIAL: Patricia Swartz	NJ	103	On line database will provide consistence in State Plan format among the States and allow for consolidated reports in the future.	OLDC; supportive	√
OFFICIAL: Patricia Swartz	NJ	104	Pre-populate of eligible entities into other areas of the Plan will save time.	supportive	√
OFFICIAL: Patricia Swartz	NJ	105	States need to be able to print out the Plan to be shared at legislative hearing, public comment session, and posted on our website.	OLDC: sharable State Plan version	See item 60.

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
OFFICIAL: Gabriella T eh	DC	106	Overall the instructions and content of the draft CSBG Model State Plan are very clear and easy to follow. It is estimated that completing the document online, with information populated, will reduce the completion time, particularly for future reporting. In addition, the limitation of 2500 characters for the narratives will require that information be concise.	supportive	√
OFFICIAL: Gabriella T eh	DC	107	Having the choice to upload documents, in the majority of cases, is a good option. However, it is recommended that this be the option throughout the Model State Plan and not a requirement.		The MSP generally does not require uploading documentation, except for the CSBG official designation letter.
OFFICIAL: Paul Dragon	VT	108	We applaud the efforts of your office to create a new performance management and accountability framework for CSBG in partnership with the CSBG Network. In general, we find the Model State Plan to be clear, effective, streamlined process for accountability.	supportive	√
OFFICIAL: Paul Dragon	VT	109	We appreciate that "Performance Management Adjustments" such as 3.4b or 7.6, are tied to State Accountability Measures and based on the use of survey feedback "as appropriate" as well as "other sources" of data.	performance management	√
OFFICIAL: Paul Dragon	VT	110	Hyperlinks to statute or definitions from statute would be useful in the OLDC State Plan. These could serve to clarify or remind the State CSBG Office of intent.	performance management	Agreed. We will be adding such automation features and tools.
OFFICIAL: Paul Dragon	VT	111	We would request that any new annual report format be provided to State CSBG Agencies prior to the start of the Federal Fiscal Year it will be required. This would provide the State enough time to prepare to collect the necessary information in the any new way required to meet the needs of the report.	Annual report	Agreed.

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
OFFICIAL: Paul Dragon	VT	112	The notice estimates the burden for collection of the proposed information to be 10 hours. We would estimate the total to be closer to 24 hours, given the additional requirements that the State office review and respond to feedback from a national survey on seven “performance management adjustments” and provide a narrative description on how and why changes were (or were not) implemented based on feedback. If the plan was able to prepopulate fields based on previous submitted plans, this could reduce some of the burden.	burden	See item 50.
OFFICIAL: Tikki Brown	MN	113	The proposed collection of information in places goes significantly beyond what is authorized in the CSBG Act. We have provided input, both general and detailed below.		OCS believes the information in the MSP is within our authority. We have also revised specific language in response to specific comments to better align the MSP and statute.
OFFICIAL: Tikki Brown	MN	114	We believe the estimate of the burden of the proposed collection of information will be significantly higher. We regularly experience substantial delays in our communication with the Office of Community Services (OCS) with respect to implementation questions and clarifications. Recently, for example, we requested clarification about an implementation issue that still, after several months, remains unresolved and in OCS' court.	burden	See item 50.

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
OFFICIAL: Tikki Brown	MN	115	Further, because the proposed collection of information goes significantly beyond what is authorized in the CSBG Act in places, if those requirements remain, there would be a substantial new burden on States and local eligible entities to collect new information. In MN, we have 36 eligible entities and receive just under \$400,000 in Community Services Block Grant funds annually. We generally restrict eligible entity administrative expending to 15%. At both the state and local levels we see administrative budgets to be stretched, even prior to the implementation of new requirements such as these.	burden	OCS believes the new performance management tools are critical to the future success of the program. We believe the MSP itself will reduce burden after the first year of use.
OFFICIAL: Tikki Brown	MN	116	We expect OCS to be clear on how they would actually use the information being requested.		noted.
OFFICIAL: Tikki Brown	MN	117	We really appreciate OCS providing an online data collectoin (OLDC) system. We anticipate that using the OLDC for the CSBG Model State Plan will significantly improve our ability to submit MN's plan in as cost-effective way as possible. We would like to also see the provision of an online system for CSBG-IS annual report. The MN state office currently has to reeneter all of the data that is collected as part of the annual report, which is a significant time and cost burden.		The annual report is under development by the CSGB data cooperative agreement grantee.
OFFICIAL: Tikki Brown	MN	118	Block Grant Nature of CSBG: There is excessive level of details being requested in the MSP for state-level and state-determined activities. It is the nature of a block grant that states have flexibility and authority in administering the CSBG. The level of details about training and technical assistance provision and communication with eligible entities in particular is inappropriate to a block grant.		The information about planned activities in the MSP is general and the state will have the opportunity to describe changes they made to the plan in the annual report.

General Comments

COMMENTS	STATE	#	COMMENT	RELATES TO	RESPONSE
OFFICIAL: Tikki Brown	MN	119	5% Administrative Levels and Organizational Standards: Monitoring against the Organizational Standards every year for every eligible entity places a significant strain on State capacity. We do not believe the current 5% administrative funding provided to MN will allow us to achieve what has been proposed. The suggestion made by OCS to consider third party review is not a practical option, even apart from the government contracting difficulties inherent in this approach, due to difficulties in finding, funding and supervising a qualified third party reviewer. States are still required to review the self-assessment and peer assessments and this takes time away from providing quality on-site reviews and follow-up. The proposed MSP is overly prescriptive and detailed with respect. OCS should allow States maximum flexibility in responding to these issues based on individual State resources, and organizational structure.	organizational standards annual assessment	See annual assessment response in section 6.
OFFICIAL: Tikki Brown	MN	120	Listing Eligible Entities with Serious Deficiencies: It is inappropriate to use the MSP as a tool for communication between States and OCS about eligible entities with serious deficiencies. First, such information is sensitive and must be appropriately handled, and seems likely to be subject to Freedom of Information Act (FOIA) requests. Secondly, the resolution of local eligible entity deficiencies is ongoing and dynamic, and thus is inappropriate for inclusion in an annual or biannual plan (which represents a point-in-time only).	serious deficiencies	Agree. See discussion of "serious deficiencies" under Section 7.

Comments Submitted to OMB (30 Day Comment Period)

COM MENT ER	STATE	#	COMMENT	RELATES TO	RESPONSE
CAP	DC	1	<p>The Partnership previously submitted comments to OMB during the initial 60-day comment period and was pleased to see the positive reception the comments received at the Office of Community Services. The changes made to the Model State Plan reflect the Office of Community Services' thoughtful assessment of recommended changes. We greatly appreciate OCS' efforts and changes made to the document released in May and look forward to working with them as the new Model State Plan is finalized.</p>	supportive	√

CAP	DC	2	<p>Section 6.4. Remove "Self-assessment/peer review with State risk analysis" as an option to select when responding to the question. The term "State risk analysis" is new to the discussion on the Model State Plan and the Federal and State Accountability Measures, and is not mentioned or defined in the Model State Plan Draft, OCS Information Memorandum 138, the federal CSBG Act or other related document related to Organizational Standards. Its definition is unknown and given that no assessment of its appropriateness or time expectation can be made at this time, it should be removed.</p>	<p>section 6: Org Standards; 6.4, risk analysis</p>	<p>Discussion notes: We added "self-assessment/peer review with State risk analysis" in response to comments from states about the burden of annual assessment of standards. In particular, see comment section 6, # 5, from Bill Brand: "Should OCS move forward this requirement [to annually assess org. standards], OCS should allow States maximum flexibility in meeting the standard, based on individual State capacity, resources, and organizational structure. This could include monitoring compliance through sampling, use of a risk matrix, focusing on limited key priority Organizational Standards, or other methodologies developed by States consistent with the Block Grant." (emph. added)</p> <p>Response: Our original response to Bill Brand's comments (see section 6, #6) was to indicate flexibility for how states could fulfill the organizational standards annual assessment requirement, as described broadly in IM 138. Therefore, we had added the "risk analysis" option. OCS is inclined to keep this option ("self-assessment/peer review with State risk analysis") as one of the response choices under item 6.4 in the MSP. In order to be responsive to the concerns from CAP and NCAF, however, we will create a Q&A to clarify what we mean by "risk analysis." In particular, the Q&A will clarify that the use of the term "risk" in the context is not associated with the provisions on pre-award risk review in the new Uniform Administrative Requirements (2 CFR 200).</p>
CAP		3	<p>Section 8.3. Add narrative for all categories, going beyond the two noted. Significant variations can be found in each of the categories noted and a narrative would be helpful to further describe these important training and technical assistance efforts.</p>	<p>Section 8: State T/TA plan</p>	<p>Response: We do not believe the usefulness of this information in the state plan outweighs the added burden to states of additional requirements.</p>

NASCSP	DC	4	We are pleased to see that the proposed revisions to the Model State CSBG Plan reflect, among things, recent guidance to agencies and information memorandums, as well as responses to concerns submitted by NASCSP during the 60-day comment period. However, this final draft still contains elements that remain unclear and non-regulated.	supportive	√
NASCSP	DC	5	NASCSP members support the proposed changes to the state plan submission process and content. However, we urge OCS to consider our feedback, particularly as it related to the demands the revised Model State Plan may place on CSBG funding and staff capacity, and concerns about content and clarity in its current format.		Response: This is a very general comment.
NASCSP	DC	6	An overall concern for NASCSP is that the linking of the Model State Plan to the State Accountability Measures seem to take away some freedom to administer the grant as each state needs within the confines of its rules and regulations, the capacity of its eligible entities, and the needs of its citizens.		Response: The change to a performance management framework (org standards, state/federal account. Measures, and NPIs) is significant; however, the CSBG Network is in agreement that this enhanced accountability, transparency, and performance management is necessary for the effectiveness and relevance of the program in the future. OCS has worked closely with NASCSP and a state workgroup to develop the state accountability measures over the last several years. The MSP is only an implementation tool for the measures. In addition, the MSP is just an information collection; it does not introduce new rules, new punitive actions or funding actions. CSBG still provides the same significant flexibility to the state to operate.
NASCSP	DC	7	It is useful for OCS to bear that in mind as they establish requirements, timeframes, and due dates for those programs, many States will face large cost burdens associated with creating new collection and reporting systems to accommodate the new standards and required performance measures.		Response: OCS is aware of the challenges facing states, especially in the transition to using the new MSP and assessment of organizational standards. We are working with states to provide support, tools, and TA to help states implement the new performance management framework. As described above (item 6), the network is in agreement that new accountability and performance systems are needed.

NASCS P	DC	8	NASCSP also urges OCS to consider collecting numerical data around planned expenditures, not percentages, for maximum clarity and usability of the data.	Response: The comments from the 60 day notice did not provide clear consensus on this point. OCS is inclined toward providing the greater flexibility of allowing states to choose expenditure amount or percentage.
NASCS P	DC	9	Question 1.1b: What is the difference between a Human Services Department and a Social Services Department? A number of State CSBG Offices are located in state Departments of Commerce, and also Economic Development or Human Rights. Should these options be listed as a specific check box? Refer to CSBG-IS, Form C, question 1 to be sure common State agency arrangements are included.	Response: We used the exact categories from the CSBG IS, question C.1. However, if the distinctions are not meaningful, we can combine the categories. Change to MSP: After checking with NASCSP, we will combine Human/Social services and potentially add other categories.
NASCS P	DC	10	Table in Question 5.1: Reword "Tribe" to "Tribal Government" or "Tribal Nation" to appropriately recognize the sovereign government status.	Response: the statute uses "Indian tribe" or "tribe," but we can change to "tribal government" in response to the comment. Change to MSP: After checking on terminology, change drop down in 5.1 to "Tribal Government or Tribal Organization"
NASCS P	DC	11	Question 6.2: The word "slightly" was changed from the previous draft to "minor." With either term, define "minor" or remove.	Response: The terminology "minor modification" comes directly from IM 138 (see page 7). Therefore, OCS is inclined to keep the word "minor" in the MSP and, to address the commenter's concern, provide an explanation/definition in a Q&A. If a state checks the box under 6.2 indicating they are making minor changes to the COE standards, CSBG staff will review if the change is minor. If OCS determines the change is significant, OCS may determine that the State classify their standards as alternative standards, rather than COE standards.

NASCS P	DC	12	<p>Question 6.4: Monitoring against the Organizational Standards every year for every eligible entity may not be feasible at current administrative levels (i.e. 5%), and appears to contradict the federal CSBG Act's allowance for state monitoring every three years.</p>		<p>Response: As described in IM 138, states are expected to assess standards annually, which does not have to be the full monitoring process required under 678B of the CSBG Act. As noted under responses to 60 day comments (see section 6, #1 of this document): "OCS believes assessing the standards each year is critical to the effectiveness of the standards. In addition, OCS has the authority to impose this requirement (see IM 138). However, OCS has provided maximum flexibility in how States choose to assess standards, as described in IM 138. OCS has funded, and will continue to fund, extensive T/TA efforts to assist states in implementing an annual assessment process."</p>
NASCS P	DC	13	<p>Question 7.4 The final draft of the Model State CSBG Plan reads as follows: "Does the State plan to make funds available to eligible entities no later than 30 calendar days after OCS distributes the Federal award?" Some State procedures are that well within 30 days after OCS "distributes the Federal award," these states will have entered into contracts with each of their community action agencies. Those contracts will specify their respective distribution shares of the 90% allocated to the CAAs from the overall award. That does not mean, however, that the CAAs have immediately free access to those funds at that time. Instead, CSBG contracts with the CAAs to provide for payment on a cost reimbursement basis only. There are nuances to funding distribution that must be considered. Consider rewording for nuances that impact distribution of funds by the States. The issue is whether local eligible entities experienced an interruption of service. Options of only yes or no do not represent scope of reasonable approaches to distributing funds.</p>	<p>note: we had some discussion here about whether we might change the 30 day time frame?</p>	<p>Please see OCS response under section 7, item 18, which reads, in part: "States whose procedures may not meet the 30 day target, but still provide timely, consistent funding to ees, will have the opportunity to describe their distribution procedures in the MSP; if they are providing funds consistently and without lapses, they will be considered as meeting the standard." Response: The current version of the MSP allows for states to describe the details of their procedures in item 7.3 and 7.4a, beyond a yes/no response in item 7.4. OCS will consider the states full response when assessing performance against the accountability measure, which takes into account the diversity of state procedures.</p>

NASCS P	DC	14	<p>Table for Question 7.9: It may be difficult for states to predict plan use for 2 years for those who submit as 2-year plan. OCS could consider removing this table, and accept narrative descriptions as sufficient. If the table is retained, we recommend adding a category (on p. 14) for "Emergencies"(such as tornadoes, floods, and other unforeseen emergencies).</p>	<p>As noted in response to comments (section 7, #32), "This is meant to be a plan for the use of funds; while states may have many allowable reasons to deviate from the plan, OCS expects them to start out with a basic plan. These are the statutory categories. Emergencies can be included in "other.""</p> <p>Response: For transparency and accountability, a state that chooses to submit a state plan must be able to provide clear plans for using CSBG discretionary funds over the entire performance period. We recognize that in some state environments it may be difficult to project two years in advance. If a state is not able to do that, the state has the option of submitting a one year plan.</p> <p>OCS has noted in training that the information in the state plan is only a plan. At the end of the performance period, the state will be expected to compare planned activities against actual and will have the opportunity to describe reasons for any deviations.</p>
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<p>NASCS P</p>	<p>DC</p>	<p>15</p>	<p>Table with Question 8.1: It may be difficult for states to predict planned technical assistance for 2 years for those who submit as 2-year plan. OCS could consider removing this table, and accept narrative descriptions as sufficient.</p>	<p>See, in part, the response under item 14 above. Response: This is meant to be a plan to provide transparency and accountability; states may deviate from the plan during the performance period as appropriate. However, to address the concern raised by states and others during the 60 day comment period - that states needed flexibility to respond to changing training and TA needs during the performance period - OCS revised the accountability measure 3Sc. As noted in the 60 day comments response (under section 8 #7), accountability measure 3Sc: "Several commenters were concerned that measure 3Sc, which measures the completion of a training and TA plan, would undermine State flexibility and responsiveness during the performance period. We revised the measure to read: "The State completed the training and technical assistance activities specified in its State plan, and/or made appropriate adjustments in response to unanticipated needs." (emphasis added.)"</p>
<p>NASCS P</p>	<p>DC</p>	<p>16</p>	<p>Question 10.1: This question may be too focused and prescriptive for some states, as monitoring schedules are dynamic and fluid based on a complex reality of factors, including agency risk-level, agency and staff availability, board meeting schedules, weather and more. If this question is not removed, consider adding a dropdown option of "biennially" or "per contract period" for states with a more flexible monitoring schedule. If it is kept, is there an expectation that this be updated with every change? To what benefit and use?</p>	<p>Response: We expect the state to provide their best estimate of their monitoring schedule in the state plan. As noted in the responses above, states will be able to provide justifications for any changes to the schedule. At minimum, OCS will expect states to provide this information in the annual report, but we may also develop procedures for updating the plan mid performance period based on the significance of the change.</p>

NASCS P	DC	17	<p>Question 10.6 The newly revised version of the CSBG Model State Plan states as follows: "Describe the State's process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the State approving a QIP?"</p> <p>This question is "associated with" State Accountability Measure 4Sa(iii). It is not stated in either the CSBG Act, or IM 116, or 45 CFR 96.92. The only reference to this is a sentence buried in the "Program Requirements" paragraph on page 7 of the attachment to IM 102 relating to Monitoring Visit checklists. However, even that latter requirement purports to apply only to T&TA reports and it has no 30-day deadline, while the MSP question purports to relate only to an identification of what entities are on QIPs. The question and the Accountability Measure both state that such report is to be made within 30 days after the State has approved the QIP for a given entity. Are these simply new requirements or do they come from some pre-existing authority?</p>		<p>Response: The general authority for this requirement is noted in the draft IM published on 1/27/15: "The CSBG Act requires States to report on performance, according to the annual reporting provision in Section 678E...and allows OCS to request additional information through the State plan, as described in Section 676(b)."</p> <p>The state accountability measures were designed by OCS and the CSBG Network to provide accountability and transparency, along with other performance management tools. All of the state measures went through thorough review by the network, including two public comment periods. OCS believes, and the network agreed, that OCS's ability to track progress on QIPs is central to the federal oversight role. With some discussion, we would consider if the 30 day time frame should be changed.</p> <p>Possible Change to Accountability Measure/MSP: consider changing time frame.</p>
NASCS P	DC	18	<p>Question 10.10 & 10.10a ask what procedures are for "re-designating existing eligible entities."</p> <p>States do not "re-designate" an eligible entity. If an "eligible entity" is de-designated, then its return as a new eligible entity would be as a new applicant through the RFI and RFP processes. In such a situation, it is not an "existing" eligible entity. If altering the MSP language is no longer an option, we suggest that guidance be offered to clarify "previous" eligible entity and "existing." For some states, if an agency is de-designated, they still remain as the eligible entity until another eligible entity is chosen therefore they would be considered the existing eligible entity. For other states, once the agency is de-designated and closed out, they are no longer the eligible entity even if the service area ceases to be served for a period of time.</p>	further discussio n	<p>Response: The category of "re-designation" came from the IS question C.5. With some discussion with NASCSP, we could explore removing this question.</p> <p>Possible change to MSP.</p>

NASCSP	DC	19	Questions 12.2 and 12.3 should be considered for possible removal. They address eligible entity level activities and community programming. States should report on their approach to ensuring eligible entities are in compliance with the income eligibility requirements. Each eligible entity might have a different approach to income verification and documenting appropriate service targeting.		<p>Response: The way the questions are written does allow the states to report on their approach to ensuring eligible entities are in compliance with requirements; the questions do not ask for information about ee activities and community programming. In fact, we re-worded the questions for this very reason, in response to 60 day comments. (Please see response in this spreadsheet under section 12, # 9.)</p> <p>We agree it is acceptable for each ee to have a different approach, if that is in accordance with state policy. Please see response in this spreadsheet under section 12, # 6.</p>
NASCSP	DC	20	NASCSP, on behalf of the leadership and its members, thanks the Office of Community Services for the transparency, collaboration and engagement demonstrated to work with all levels of the CSBG Network to build and revise the Model State Plan and move the Network forward. We are pleased to have participated as key informants in the revision process and are grateful for the opportunity to contribute our thoughts, comments and feedback on the revised Model State Plan through this formal comment.	supportive	√
NCAF	DC	21	This final draft plan retains the many elements we identified as being effective, clear and an advance in defining the performance of the Community Services Block Grant network organizations at all levels. Any edits are improvements.	supportive	√
NCAF	DC	22	Next, we believe significant positive changes were made to address the concerns we had regarding the first draft's language in sections 3.2, 10.5, 8.3, 9.3 and 9.4 and a number of the concerns we expressed regarding section 6.	supportive	√
NCAF	DC	23	The revised burden estimate is also realistic.	supportive	√

NCAF	DC	24	<p>However, we do have one new substantive concern: the May draft injects a new term and concept into the Plan. We believe the reference to a state “risk assessment” of local agencies in the checklist at section 6.4 [“Self-assessment/peer review with State risk analysis”] is confusing, undefined and should be removed.</p> <p>The term “State risk analysis” is not mentioned or defined in any OCS guidance or policy document currently in use by grantees the Model State Plan, IM 138, or other related document. Its definition is unknown, HHS guidance on adequate risk analysis process and content is not developed and state practices, if any, are not standardized. Further, the organizational standards are not individually tied to their impact on risk mitigation. States’ risk assessment tools developed now in response to this plan element would be different in each state....</p> <p>THIS COMMENT CONTINUES IN THE NEXT ROW.</p>	<p>section 6: Org Standards; 6.4, risk analysis</p>	<p>See response under CAP item 2 above.</p>
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NCAF	DC	24a	We recognize that the OMB "Super Circular" includes grantee risk assessment as a general expectation. If the intent of this plan draft was to connect that risk assessment to the unique system of CSBG local organizational standards, we respectfully submit that work has not yet begun even to identify the application of the OMB requirements to the Block Grant-specific operations, much less to make any direct connection between failing to meet, or partially meeting, any one of the four dozen plus organizational standards; a level of "risk" as defined by the regulation does not exist today and may take some years to define - should that exercise ever prove desirable. {Example: "Organizational Standard 2.4. The organization documents the number of volunteers and hours mobilized in support of its activities." An agency which has collected the volunteers' names and dates the volunteers' work but does not require volunteers to record timesheets and lacks a database system for unduplicating volunteers with similar names, its performance on this standard may be poor to middling. The matter of whether this shortcoming is connected to "risk" and, if so, how it would be weighted when scoring a risk level has not been considered yet by OCS or any state we know of and does not seem to be clarified by the Super-Circular.]	see above	see directly above
NCAF	DC	25	In addition, we have an editorial suggestion that might clarify further the strong and sensible final version of section 10.5 and other sections related to performance that use the same phrase. As a substitute for the informal phrase "... entities are currently on Quality Improvement Plans?" use "... entities are currently IMPLEMENTING [or perhaps COVERED BY?] Quality Improvement Plans (QIPs), IF ANY?" The term 'on' is a little vague. The reason to insert "if any" is to clarify that there is no expectation that all or most states will always have subgrantees exhibiting the type of serious deficiency that calls for a QIP.		Response: We agree with the clarification. Change to MSP: Under item 10.5, change "on" to "covered by".
NCAF	DC	26	Thank you again for the many opportunities offered the public to participate in the development of a more effective and accountable federal Federal-State-Local CSBG system including this opportunity to offer input to the final Model State Plan. We are convinced the changes will strengthen the community action program.	supportive	√

CAPLA W	MA	27	Item 2.4. In 2.4a. and 2.4b. we suggest changing “last year” to “since the last State Plan submission.”	2.4	Clarity edit.
CAPLA W	MA	28	Item 3.3a. Change “Check all that apply and narrative where possible” to “Check all that applies and include narrative where possible.” Clarify that “annual reports” are “CSBG annual reports” and that “Eligible entity plans” are “Eligible entity Community action plans.”	3.3a	Clarity edit.
CAPLA W	MA	29	Item 3.3b. Change “Check all that apply and narrative where possible” to “Check all that applies and include narrative where possible.”	3.3b	Clarity edit. Minor.
CAPLA W	MA	30	Item 4.3. Revise the parenthetical to say “(If the State did not hold a public hearing on this State Plan in the year prior to the first Federal fiscal year covered by this plan and/or a legislative hearing in the last three years, provide further detail.)” The Instructional Note states that “The date(s) for the public hearing(s) must have occurred in the year prior to the first Federal fiscal year covered by this plan.” Specify whether the year prior to the first Federal fiscal year covered by the plan is the calendar year or the federal Fiscal year.	4.3	Clarity edit.
CAPLA W	MA	31	Address Revisions to State Plans. Add another item revisions to State Plans that says ““Describe the State’s procedures for revising its CSBG State Plan, including how proposed revisions to the State Plan will be made available for public inspection within the State in such a manner as would facilitate review of, and comment on, the Plan.”	4	new question: state plan revisions.
CAPLA W	MA	32	Item 4.4. Provide examples of what information should be provided as “supporting documentation” or in a hyperlink (e.g., hearing notice, transcript etc.)	4.4	request for examples.

CAPLA W	MA	33	Item 5.1. In the first sentence, change the word “private” to “nonprofit.” In the second sentence, make clear that the term “90 percent funds” is a defined term by capitalizing the term throughout the document and changing the reference to them in the parenthetical to say “90 Percent Funds (as defined below under item 5.3)”.	5.1	Clarity edit. Minor.
CAPLA W	MA	34	Item 5.2. In the Instructional Note capitalize the term “90 Percent Funds.”	5.2	Clarity edit. Minor.
CAPLA W	MA	35	Item 6.3. We suggest splitting this item into two items. The first item would state “How will/has the State officially adopt(ed) organizational standards for eligible entities in the State? If “Other” is selected, provide a timeline and additional information, as necessary. [Check all that apply and include a narrative where applicable]” and would include the checkboxes included in the proposed Model State Plan. The second item would ask “How did the State determined that its process for adopting organizational standards was consistent with the State’s administrative procedures act and other applicable state law?”	6.3	splitting question in two: adoption of standards.
CAPLA W	MA	36	Item 6.4. Change “[Check all that applies]” to “[Check all that apply]”	6.4	Clarity edit. Minor.
CAPLA W	MA	37	We recommend including a check box for “Regular desk review by State.”	6.4	adding check box item.
CAPLA W	MA	38	Please clarify what is meant by “risk analysis” in the check box for “Self-assessment/peer review with State risk analysis” (e.g., prioritizing eligible entities for further review based on self-assessment/peer review).	6.4	See risk analysis discussion discussion.

CAPLA W	MA	39	<p>Item 7.1. We suggest defining the terms “Historic” and “Hold Harmless.” We believe that a narrative would be helpful for all responses to this question.</p> <p>We also suggest adding the following questions regarding the formula for allocating 90 Percent Funds to CSBG eligible entities:</p> <p>“Has the formula changed since the last State plan submission?”</p> <p>“If yes, please include narrative describing the change and the basis for the change and answer the following questions:</p> <p>Did the formula change result in the reduction in the proportional share of one or more eligible entities’ 90 Percent Funds?</p> <p>If so, did the State provide affected eligible entities with notice and an opportunity for a hearing on the record and determine that cause existed for the reduction?”</p>	7.1	additional definitions and questions: state allocation formula
CAPLA W	MA	40	Items 7.2 and 7.3. Capitalize “90 Percent Funds.”	7.2 and 3	Clarity edit. Minor.
CAPLA W	MA	41	Item 7.3. At the end of this item add “Specify whether eligible entities are paid on an advance or reimbursement basis and, if they are paid on a reimbursement basis, include the reimbursement process and timeframe for eligible entities to receive reimbursement in the description of steps in the State’s process for distributing 90 Percent Funds and number of days each step is expected to take.”	7.3	additional question: do states pay ees by reimbursement and describe timeline and process.
CAPLA W	MA	42	Item 7.4. We recommend clarifying what the phrase “make funds available to eligible entities” means and suggest defining it as meaning when the eligible entities will actually receive the funds, whether on an advance or reimbursement basis.	7.4	additional definition: timeline for state providing funds to ees.
CAPLA W	MA	43	We recommend that OCS collect information (for example, in the CSBG annual report submitted by States) on the actual time it takes the State to make CSBG funds available to eligible entities.		Question in annual report: timeline for state providing funds to ees.

CAPLA W	MA	44	Item 7.5. We recommend adding one or more examples of what improving grant and/or contract administration procedures might mean.	7.5	adding example.
CAPLA W	MA	45	We recommend that OCS collect data on which Federal fiscal year's funding each State is distributing.	7.5	adding data collection: the FFY of the funds the state is distributing
CAPLA W	MA	46	Item 7.6. We recommend specifying that the estimated allocation of CSBG funds for administrative activities be expressed in both dollars and a percentage, since the limit on the use of CSBG funds by the State for administrative purposes is the greater of \$55,000 or 5%.	7.6	Recommends both % and \$ for admin funds.
CAPLA W	MA	47	Item 7.9. In the Instructional Note, change the term "The assurance under 676(b)(2)" to "Section 676(b)(2)," as Section 676(b)(2) requires a description but not an assurance. Also, change the sentence "If a funded activity fits under more than one category in the tab, allocate the funds among the categories" to "If a funded activity fits under more than one category, indicate in narrative if that it could fall into more than one category and list the categories it could fall into." In the example, please clarify what "should be allocated appropriately" means.	7.9	Clarity edit. "assurance vs. description" issues.
CAPLA W	MA	48	In the table, clarify that h. is "Other activities, consistent with the purposes of the CSBG Act"	7.9	Clarity edit.
CAPLA W	MA	49	Item 8.1. We recommend adding "Legal Compliance" as a T/TA topic in the "Topic" column of the table. In the sample table, it appears that information on the conference in the column entitled "Brief Description of "Other"" is cut off.	8.1	Adding new TA category: legal compliance.
CAPLA W	MA	50	Item 8.3. In brackets, state "Check all that apply and include narrative where applicable."	8.3	Clarity edit. Minor.
CAPLA W	MA	51	Item 9.3b. Change the term "assurance" in this item to "description," as Section 676(b)(3)(B) requires a description, not an assurance.	9.3b	Clarity edit. "assurance vs. description" issues.
CAPLA W	MA	52	Item 9.7. Change the term "assurance" in this item to "description," as Section 676(b)(3)(C) requires a description, not an assurance.	9.7	Clarity edit. "assurance vs. description" issues.
CAPLA W	MA	53	Item 9.9. Please clarify what information is requested in the "Topic" column of the table.	9.9	Adding instructions/definition.

CAPLA W	MA	54	Item 10.1. For purposes of the column "Date of Last Full Onsite Review (if applicable)," specify when a full onsite review may not be applicable (e.g., in the case of a newly designated eligible entity where the deadline for the first full onsite review has not yet occurred).	10.1	Adding instructions/example.
CAPLA W	MA	55	Item 10.7. Change this question to "How does the State ensure ..." and require inclusion of a narrative.	10.7	edit and inclusion of narrative. (Beyond the actual required assurance.)
CAPLA W	MA	56	Item 10.9a. Remove the word "new."	10.9a	Clarity edit.
CAPLA W	MA	57	Item 10.10. Please clarify what "re-designate an existing eligible entity" means. Re-designation is not a term used in the federal CSBG Act.	10.1	See discussion of re-designation above.
CAPLA W	MA	58	Item 11.1. Change text in brackets to read "Check all that apply and include narrative where applicable."	11.1	Clarity edit. Minor.
CAPLA W	MA	59	Item 11.2. Add a check box for "After every regularly scheduled board meeting."	11.2	adding check box item.
CAPLA W	MA	60	Item 12.1. Delete the existing question and re-phrase it as follows: "What is the income eligibility limit for CSBG services in the State?" In the description for the second check box, specify that the percentage must not be below 100% or more than 125% of the Federal Poverty Line. In the description for the third check box, clarify that the limit used by eligible entities in the State may not be higher than 100% of the FPL or the limit established by the State, if such limit is higher (but no higher than 125% of FPL).	12.1	Clarity edit.
CAPLA W	MA	61	Item 12.1a. Re-phrase to say "Describe any State policy and/or procedures for determining client eligibility for CSBG benefits/services (such as definition of income and family/household composition)"	12.1a	Clarity edit.
CAPLA W	MA	62	Item 12.2. Replace the word "verify" with "determine."	12.2	Clarity edit.
CAPLA W	MA	63	Item 14.2. In the Note, change the term "assurance" to "use," as section 676(b)(2) requires a description, not an assurance.	14.2	Clarity edit. "assurance vs. description" issues.

CAPLA W	MA	64	Item 14.3b. In the Note, change the term "assurance" to "use," as section 676(b)(3)(B) requires a description, not an assurance.	14.3b	Clarity edit. "assurance vs. description" issues.
CAPLA W	MA	65	Item 14.3c. In the Note, change the term "assurance" to "use," as section 676(b)(3)(C) requires a description, not an assurance.	14.3c	Clarity edit. "assurance vs. description" issues.
CAPLA W	MA	66	Item 14.3d. In the Note, capitalize "90 Percent Funds."	14.3d	Clarity edit. Minor.

Q&A in Response to 30 Day Comments

# from 30 day comments	Question	Response
2, 24, 25	<p>What is the meaning of "risk analysis," as referenced under item 6.4, in the response option "self-assessment/peer review with State risk analysis"? Is this term associated with the pre-award risk review requirements in the new Uniform Administrative Requirements in the Federal Code of Regulations?</p>	<p>The term "state risk analysis" in MSP item 6.4 is used generically to describe a range of strategies states may use to prioritize the type or degree of follow-up the state performs in order to validate the results of an eligible entities' organizational standards self or peer assessment. As described in IM 138, while states must annually assess organizational standards for each eligible entity, they may choose to establish procedures by which they tailor their processes according to pre-identified risk factors. For example, a state may assess organizational standards each year through monitoring visits for 1/3rd of their entities and then self-assessment for the rest of their entities. Of those self-assessed eligible entities in a given year, the state may prescribe varying levels of follow-up depending, for example, on an analysis of information from the self-assessment, the entity's last monitoring visit, and any recent audits. Based on this analysis, the state may choose to perform a more intensive validation process for those entities with any or certain findings or issues, and less intensive follow-up -- perhaps by phone or email -- for those entities with no issues. OCS wants to provide as much flexibility as possible as to how states carry out the annual assessment requirement. By including the option of "risk analysis" in MSP 6.4, OCS is indicating that states may define their own procedures and approaches. Regardless of the approach or approaches for assessment the state identifies in 6.4, the state must describe their procedures in item 6.4a, which will be subject to OCS review.</p>

24, 25	Is this term associated with the pre-award risk review requirements in the new Uniform Administrative Requirements in the Federal Code of Regulations?	As noted above, the term "risk analysis" is used generically in this instance and is not related to the provisions on risk review in the new Uniform Administrative Requirements.
6	Does the linking of the Model State Plan to the State Accountability Measures take away some freedom to administer the grant as each state needs within the confines of its rules and regulations, the capacity of its eligible entities, and the needs of its citizens.	<p>The change to a performance management framework (org standards, state/federal account. Measures, and NPIs) is significant; however, the CSBG Network is in agreement that this enhanced accountability, transparency, and performance management is necessary for the effectiveness and relevance of the program in the future. CSBG still provides the same significant flexibility to the states to operate.</p> <p>OCS has worked closely with NASCSP and a state workgroup to develop the state accountability measures over the last several years. The MSP, as an information collection, is only an implementation tool for the measures. The MSP does not introduce new rules, new punitive actions or funding actions.</p>
11	MSP question 6.2 reads: "If the State is using the COE-developed organizational standards, does the State propose making a minor modification to the standards, as described in IM 138?" Define the term "minor."	<p>The terminology "minor modification" comes directly from IM 138 (see page 7). The term "minor" means a change that OCS, upon review, determines does not significantly undermine the overall integrity of the standards, and for which the state has a compelling rationale. In general, a State may not pick and choose standards to change based on their preferences. They must have a compelling reason, based on structural, legal, or other factors in their state. OCS would expect states to modify standards, rather than omitting them completely.</p> <p>In the MSP, if a state checks the box under 6.2 indicating they are making minor changes to the COE standards, CSBG staff will review the state's description of their proposed modification under 6.2a. If OCS determines the change is significant, rather than minor, OCS may require that the State re-classify their standards as alternative standards, rather than COE standards, under 6.1.</p>

13	<p>MSP question 7.4 reads: "Does the State plan to make funds available to eligible entities no later than 30 calendar days after OCS distributes the Federal award?"</p> <p>Does the timeframe and question account for possible state procedural nuances that impact state distribution of funds particularly for those states that issue contracts and provide funds to ees on a cost reimbursement basis?</p>	<p>Yes, questions 7.3, 7.4 and 7.4a, and the associated performance measure 2Sa, do take into account the range of state procedures for distributing funds to the ees. OCS significantly revised these questions in the MSP based on comments we received during the 60-day comment period. The revised questions and accountability measure allow states to provide a complete description of their distribution procedures and emphasize that a state that has a process to provide funding to ees consistently and without interruption meets OCS expectations.</p>
13	<p>In MSP question 7.4 (see above), does the term "make funds available" mean that the ees must have direct access or draw down to the funds?</p>	<p>Yes, "make funds available" in this question means that ees have direct access to the funds within the 30 day timeframe. However, OCS is not requiring states to have this kind of a procedure. If a state has different distribution procedures that do not technically meet the 30 day timeframe, such as a cost reimbursement procedure, the state will answer "no" under 7.4 and describe their procedures under question 7.4a. OCS will consider the state as meeting the accountability measure 2Sa if the state meets the 30 day timeframe under 7.4 OR if the state provides funding to ees consistently and without interruption, through other procedures.</p>
18	<p>In MSP question 10.10, what does "re-designation" mean?</p>	<p>Designation: The State process for designating an organization as a new eligible entity, as described under Section 676A of the CSBG Act.</p> <p>De-designation: The State process to terminate the designation of an organization as an eligible entity, as described under Section 678C of the CSBG Act.</p> <p>Re-designation: The state process for designating a current eligible entity to serve a geographic area of a state that is not, or ceases to be, served by another eligible entity, as described under Section 676A of the CSBG Act.</p>