Block Grant Guidance Federal Register Submission

Comments from University of Illinois Chicago, School of Public Health, Center of Excellent in MCH:

Based on the analysis of state Title V funding presented in this report, the following recommendations are provided to the Maternal and Child Health Bureau and other MCH stakeholders and partners as a way to strengthen the Title V MCH Block Grant.

- **Improve Budget Narrative Guidance.** The variation in the budget narratives, the fact that there is almost no information on whether state general revenue funds used for the match are designated versus non-designated funds, and the generally inconsistent information across the narratives suggests the need for MCHB to require a few key parameters for the budget narrative descriptions going forward. Suggested components to include in each budget narrative are as follows:
  - More explicit descriptions of what should be included in the categories for *State Funds*, *Local Funds*, *Program Income Funds*, and *Other Funds* on Form 2 should be provided to the states by MCHB. The amounts for each of these funding categories on Form 2 are pre-populated by TVIS from SF424 (18c-f) but instructions for what to include in each category are limited to the brief definitions provided in the "Reporting Definitions for the Forms" on page 77-78 of the current Title V Block Grant guidance, likely leading to inconsistent reporting across states.
  - With respect to *State Funds* in particular, specific delineation of the percent of undesignated state general revenue funds used for non-federal Title V funding should be required. This will provide a truer picture of how often states are counting other state funded programs as their match and the extent to which states actually have unrestricted funding available to them to achieve their goals and objectives.

Comments from Illinois Department of Public Health:

- States would benefit from seeing more clarity regarding forms in the guidance documents, specially Form 10, during both the Needs Assessment years and the interim years. Form 10 needs to have a better explanation for the direct connection to the action plan, and clarification that the action plan will be unavailable for editing or entry until Form 10 is fully complete. In a needs assessment year, once open- it will be blank- and the state will need to complete this in full and would benefit from seeing this outline as to be able to think through and complete the objectives for their selected newly measures.

- Clear description of the “copy” functionality in EHBs and when/how to us it. Clarity on not needing to add updates each year and the ability to copy without the need to clarify would be helpful.