



Maternal and Child Health Unit
Public Health Division
122 West 25th Street, 3rd Floor West
Cheyenne, WY 82002
Phone (307) 777-6921 • 1-800-438-5795
Fax (307) 777-7215 • Health.wyo.gov



Stefan Johansson
Director

Mark Gordon
Governor

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U.S. Department of Health and Human Services
Health Resources and Services Administration
Information Collection Clearance Officer
Room 13N82
5600 Fishers Lane
Rockville, MD 20857

To Whom It May Concern:

Title V Maternal and Child Health Services Block Grant to States Program: Guidance and Forms for the Title V Application/Annual Report, OMB No. 0915-0172 - Revision

The Wyoming Department of Health, Maternal and Child Health (MCH) Unit respectfully submits the following comments regarding the proposed Title V MCH Services Block Grant Application/Annual Report Guidance as detailed in the [Federal Register](#) issued May 19, 2026.

As most proposed revisions are minor and do not substantially change the reporting and application guidance, we take this opportunity to share feedback and suggestions to improve the efficiency and effectiveness of the reporting process, based on our experience following the existing guidance.

The existing and proposed structure is intended to reduce the reporting burden on states, and we believe that additional modifications could further reduce it and streamline grantees' writing processes. Specific comments and suggestions follow:

1. Addressing Areas of Duplication and Guidance Structure

- **System of Care/Services and Medicaid Overlap:** We observe significant overlap between the *System of Care for Mothers, Children, and Families*; *System of Services for Children and Youth with Special Healthcare Needs (CYSHCN)*; and the *Relationship with Medicaid* narrative sections. To reduce reporting burden and improve clarity, we suggest creating a single, cohesive narrative section regarding the health care delivery system for MCH populations, with continued guidance for grantees to report on their relationship and joint efforts with Medicaid. This would allow states greater flexibility to organize information in a



manner that best reflects their state-specific structures. We further recommend combining the current character counts for three narratives into a single narrative, allowing greater flexibility in reporting on the relationship with Medicaid (see related suggestions under #2).

- **Organizational Capacity and Design:** Guidance on organizational capacity and design is currently dispersed across separate narrative sections:
 - State Title V Program Narratives: *Purpose and Design* and *Organizational Structure*
 - Needs Assessment: Title V Program Capacity Narratives: *Impact of Organizational Structure* and *Impact of Agency Capacity*

We propose consolidating these into a single narrative section focused on state and Title V organizational structure and capacity. We similarly recommend combining the current character counts for affected narratives to allow adequate space to detail the organizational structure and its impacts.

2. Narrative Length and Formatting Constraints

- **Medicaid Narrative:** The current word count allowance is insufficient, hindering comprehensive reporting. We recommend revisiting this word count to ensure states can adequately describe their efforts.
- **Executive Summary:** The brevity required for the *Success Story* narrative within the Executive Summary is restrictive, limiting our ability to provide necessary detail or highlight multiple examples. We request an increase in the allowed page count for *Success Story* to better accommodate the elaboration of success stories.

3. Needs Assessment and Emerging Issues

- **Ongoing Needs Assessment Updates:** Following the five-year needs assessment, it has proven difficult to generate significant new text for ongoing needs assessment reporting while continuing to digest findings from the recent assessment. We seek clarification on how best to report on emerging issues and data arising outside the primary five-year needs assessment cycle.

4. Public Input and Community Engagement

- **Integration of Public Input Section:** We recommend combining the *Public Input* section into the *Family and Community Engagement* narratives. Community focus is centered on engagement in the planning, implementation, and evaluation of work, rather than the formal application process itself. We also request clarification on whether a separate public input section is a statutory requirement, as the guidance to solicit public input and report the number and nature of such comments does not align well with the timeframe for internal review and finalizing the block grant for submission.

5. Operational Challenges

- **Form 5:** This form continues to present challenges for both completion and interpretation for our partners. We request additional guidance or resources to help us complete this form.

- **Optional Narratives and Review Communication:** We appreciate the inclusion of optional narratives to reduce reporting burden. We further appreciate the automated “last modified” date stamp in TVIS. However, managing reviews and communicating updates to state agency leadership presented challenges. To reduce confusion among internal reviewers, we provided a memo to leadership detailing which narratives were not updated. We request exploring methods to communicate optional narratives more effectively within the existing structure.

If you require additional information or have questions regarding the public comments detailed herein, please contact me at 307-777-3733 or feliciana.turner@wyo.gov.

Sincerely,



Feliciano Turner
Maternal and Child Health Unit Manager
Public Health Division

FT/cs