Attachment A

Summary of Major Public Comments and the OCS Response

1. **Model State Plan item 3.2 – Statewide vision and goals:** Several commenters were concerned that the requirement for states to describe a statewide vision and goals in Model State Plan item 3.2 and accountability measure 1Sa(i) infringed on the authority of the eligible entities to develop their local visions and goals. Other commenters were concerned that the question required states to "roll up" all the visions and goals from each of the eligible entities' local plans into the Model State Plan, which would be onerous and impractical. In response, OCS revised item 3.2 by using the terms "goals and strategies" rather than "vision and goals," clarifying that the statewide goals and strategies refer to state administration of CSBG and not to anti-poverty goals and strategies determined locally. We have provided examples of state-level goals and strategies in the state accountability measures document.
2. **Model State Plan item 10.5 – State reporting on CSBG eligible entity serious deficiencies:** Many commenters expressed concern about the requirement under item 10.5 to report eligible entities with serious deficiencies by name and indicated that the Model State Plan was not the right mechanism for collecting this type of information. In addition, commenters asked for clarification of items 10.5 and 10.6, especially a definition for the term "serious deficiency." In response, OCS has removed the term "serious deficiency" from the Model State Plan and the associated state accountability measure 4Sa(iii), and revised item 10.5 to ask for the number of entities on Quality Improvement Plans, rather than the list of entities by name. OCS expects to seek OMB clearance to collect eligible entity-specific corrective action status in the CSBG annual report or another type of report, rather than in the Model State Plan, an approach suggested by commenters.
3. **Model State Plan section 14 – CSBG assurances:** In the proposed Model State Plan, OCS had designed section 14 to be a plain language version of the assurances listed in section 676(b) of the CSBG Act. However, several commenters indicated that the wording of many of the questions in section 14 was confusing. In particular, items 14.1 a-c, 14.4, and 14.6, required states to "roll up" information from local eligible entity plans, which is beyond the scope of section 676(b) of the CSBG Act, and is technically burdensome. Commenters also suggested that the content of several of the assurances could be included in Section 9, Linkages and Communication. In response, OCS has revised section 14 substantially, particularly by quoting the statutory language for each of the assurances, rather than using plain language versions. In addition, we have created new questions in section 9 that correspond to several items from the assurance section.
4. **Timeframe for state distribution of funds:** Several commenters were concerned that the questions in section 7, and corresponding accountability measure 2Sa, on distribution of funds to the eligible entities did not account for the variety of state distribution practices, and could unintentionally penalize states that have effective procedures. Commenters were confused about what part of the state distribution process was included in the 30 day distribution timeframe in the measure, and some suggested that the time frame should include the full state process rather than just a part. In response, OCS revised the questions and accountability measure to indicate that the time frame encompasses the entire state process (starting from after the federal award). While we are retaining the 30 day target in

the measure to encourage timeliness and accountability, we have also added a question to allow any state that does not make that timeframe to explain its procedures to ensure funds are made available to eligible entities consistently and without interruption.

5. **Paperwork Reduction Act estimated burden:** Several commenters indicated that the proposed estimated, average, annual burden of 10 hours per state significantly underestimated the amount of time it would take for a state to prepare and submit their state plan, particularly considering the training required in the first year to learn the new automated system. In response, we are revising the burden estimate to include a more robust accounting of the burden of the planning that goes into the plan, as well as the added change management effort and training required to learn the new system in the first year.
6. **Annual assessment of CSBG eligible entities on organizational standards:** 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 reflected in section 6 of the Model State Plan and associated accountability measure 6S. In response, while OCS is well aware of these concerns and is addressing them in a variety of ways, the requirement for states to assess organizational standards annually is outside the scope of the Model State Plan and is not included in the burden calculation. OCS's position is that assessing the eligible entities against organizational standards each year is a critical performance management tool. OCS efforts to support states in implementing the organizational standards include funding a multi-year, extensive training and technical assistance effort and allowing maximum flexibility in how states choose to assess standards, as described in Information Memorandum (IM) 138.
7. **Quality Improvement Plans and Technical Assistance Plans:** Related to the item above about assessment of organizational standards, many commenters asked for clarification of the terms "Quality Improvement Plans" (QIPs) and "Technical Assistance Plans" (TAPs) as they relate to the corrective action activities and as they are used in sections 6, 8, and 10 of the Model State Plan, and in state accountability measure 6Sb. In response, OCS revised several items in section 8 and the accountability measure to reduce confusion and clarify the terminology.
8. **FY 2015-2016 state plans:** We received numerous questions regarding what data OCS would require the 13 states that are currently in the middle of a two-year state plan performance period to submit for FY 2016. In response, OCS is working with these states to develop a simple, one-time strategy to address this issue. All CSBG grantees, including these 13 States, will submit some basic information about organizational standards and State accountability measures in FY 2016 in order to implement the CSBG performance management framework across the CSBG network at the same time. However, OCS is working with OLDC staff and the 13 states to provide a solution that is as simple as possible for FY 2016.
9. **New state accountability measure on eligible entity overall satisfaction:** Several commenters suggested that the state accountability measures should include an overall satisfaction measure similar to the federal measure, 8F, on grantee satisfaction. We agree that a state overall satisfaction measure would be a useful performance improvement

tool. Therefore, we have included a new measure, 8S, Eligible Entity Satisfaction, to the state accountability measures. We have also included a new question in the Model State Plan, item 3.5, that allows the state, after the baseline year, to set a target overall satisfaction score in their state plan. The American Customer Survey Index (ACSI) methodology that OCS will be using provides information on specific performance areas that an agency can target for improvement in order to raise their overall satisfaction score. OCS will provide additional information on the ACSI methodology in future communication, training, and technical assistance.