Changes to the CSBG State Plan

Office of Community Services
Division of Community Assistance
January 9, 2018
Welcome!
OCS Guidance

• Federal Register
  – Volume 82, Number 221, Page 54348
  – Posted November 17, 2017
  – Closes January 16, 2018

• Dear Colleague – CSBG State Plan Revision: Open Comment Period
  – Released November 22, 2017
Today’s Focus

• The Paperwork Reduction Act Process
• CSBG Webinar Series
• CSBG State Plan Revisions
Reminder...

Plan Comments Due: Tuesday, January 16, 2018
Paperwork Reduction Act (PRA) Process
PRA Process

• Federal Register Notice
  – Volume 82, Number 221, Page 54348
  – Opened November 17, 2017

• Two Public Comment Periods
  – First Comment Period, 60 Days (closes January 16)
  – Second Comment Period, 30 days
    • Expected time period (February 2018 – March 2018)
PRA Process continued

• One Internal Comment Period
  – Expected time period: April 2018 – May 2018

• OLDC Opens July 2, 2018 for FY2019 Submissions
CSBG State Plan Webinar Series
## CSBG State Plan Webinar Series

### FY 2019 Submission Groups

<table>
<thead>
<tr>
<th>GROUP A</th>
<th>The following states are required to submit a one- or two-year plan for FY2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama</td>
<td>Alaska</td>
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<tr>
<td>District of Columbia</td>
<td>Florida</td>
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<tr>
<td>Massachusetts</td>
<td>Georgia</td>
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<td>New Jersey</td>
<td>Michigan</td>
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<td>Utah</td>
<td>Oregon</td>
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<td>Vermont</td>
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<td>Arizona</td>
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<td>Georgia</td>
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<td>Mississippi</td>
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<td>Puerto Rico</td>
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<td>Connecticut</td>
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<td>Nebraska</td>
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<td>South Carolina</td>
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<td>Washington state</td>
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<td>Delaware</td>
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<td>Maryland</td>
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<td>New Hampshire</td>
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<td>South Dakota</td>
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<td></td>
<td>Wyoming</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>GROUP B</th>
<th>The following states are solely required to submit a SF-424M for FY2019, but may submit updates to their accepted plans</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arkansas</td>
<td>California</td>
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<tr>
<td>Illinois</td>
<td>Indiana</td>
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<td>Maine</td>
<td>Minnesota</td>
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<td>New Mexico</td>
<td>New York</td>
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<td>Oklahoma</td>
<td>Pennsylvania</td>
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<td>West Virginia</td>
<td>Wisconsin</td>
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<td>Colorado</td>
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<td>Iowa</td>
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<td>Missouri</td>
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<td>North Carolina</td>
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<td>Rhode Island</td>
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<td>Hawaii</td>
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<td>Kentucky</td>
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<td>Montana</td>
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<td>North Dakota</td>
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<td>Tennessee</td>
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<td>Idaho</td>
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<td>Louisiana</td>
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<td>Nevada</td>
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<td></td>
<td>Texas</td>
</tr>
<tr>
<td>Webinar Title</td>
<td>Description</td>
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<tr>
<td>------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Changes to CSP</td>
<td>A one-time webinar focused on the revisions made to the CSP</td>
</tr>
<tr>
<td>State Plan Prep!</td>
<td>An annual webinar focused on refreshers to help you in completing your state plan</td>
</tr>
<tr>
<td>Button Down: Designation Letter(s), Authorizing Officials, Certifications</td>
<td>An annual webinar focused on requirements around the designation letter, authorizing officials, and certifications</td>
</tr>
<tr>
<td>Great! We Made It!</td>
<td>A one-time webinar focused on the final changes made to the CSBG State Plan</td>
</tr>
<tr>
<td>Submitting the Plan!</td>
<td>An annual webinar focused on refreshers for submitting the CSBG State Plan in OLDC</td>
</tr>
<tr>
<td>Submitting the SF-424M!</td>
<td>An annual webinar focused on refreshers for submitting the SF-424M</td>
</tr>
</tbody>
</table>
CSBG State Plan Revisions
CSBG State Plan Revisions Summary

- CSBG Model Plan → CSBG State Plan (CSP)
- No revisions were made to Sections 13 - 15
- Revisions based on technological refinements
  - Skip Logic
  - Pre-population
- Character Limits Updated
- States should report on the Federal Fiscal Year
CSBG State Plan Revisions Summary continued

- Attachments minimized
  - Character Limit Updated

<table>
<thead>
<tr>
<th>Item No.</th>
<th>Item Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.3.</td>
<td>Designation Letter [Required]</td>
</tr>
<tr>
<td>2.3.</td>
<td>Legislation/Regulation</td>
</tr>
<tr>
<td>4.4.</td>
<td>Public Hearing Documentation [Required]</td>
</tr>
<tr>
<td>6.1b.</td>
<td>Alternative Organizational Standards [Required, as applicable]</td>
</tr>
<tr>
<td>10.2.</td>
<td>Monitoring Policies</td>
</tr>
<tr>
<td>15.1.</td>
<td>Lobby Certification</td>
</tr>
<tr>
<td>15.2.</td>
<td>Drug-free Workplace Certification</td>
</tr>
<tr>
<td>15.3.</td>
<td>Debarment Certification</td>
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<tr>
<td>15.4.</td>
<td>Environmental Tobacco Smoke</td>
</tr>
</tbody>
</table>
Section 1 – New Items

- CSBG Administrative Information
- 1.1 and 1.1a. Length of Plan and Time Period
  - Added for clarification
  - Helps with skip logic and pre-population
- 1.5. State Association
  - Promote partnership
  - Up-to-date information

1.1. Identify whether this is a one-year or a two-year plan. ○ One-Year ○ Two-Year

1.1a. Provide the federal fiscal years this plan covers: Year One ___ Year Two ___

1.5. Provide the following information in relation to the State Community Action Association.
Section 1 – Revisions

- Character Limits were Reduced Throughout the Section
- Yes/No Added for Information Updates
  - Technology is still under review
- Clarity of Language
- Skip logic added to all optional narratives
Section 2 – Revisions

• State Legislation and Regulation
• No New Items
• 2.3 Legislation/Regulation Document: Revised

2.3. Original Wording
If yes was selected in item 2.1 and/or 2.2, attach a copy (or copies) of legislation and/or regulations or provide a hyperlink(s), as appropriate.

2.3. Rewrite
Legislation/Regulation Document: Attach the legislation and/or regulations or provide a hyperlink(s) to the documents indicated under Items 2.1. and/or Item 2.2.
Section 3 – Revisions

- State Plan Development and Statewide Goals
- No New Items
- 3.3a. – 3.3c State Plan Development – Revised
  - Originally 3.3a. and 3.3b.
  - Revised for clarity

**Original Wording**

3.3. State Plan Development: Indicate the information and input the State accessed to develop this State Plan.
3.3a. Analysis of…
3.3b. Consultation with…

**Rewrite**

3.3. State Plan Development: Indicate the information and input the state accessed to develop this State Plan.
3.3a. Analysis of state-level tools
3.3b. Analysis of local-level tools
3.3c. Consultation with…
Section 4 - Revisions

- No New Items
- 4.3. Public and Legislative Hearings – Revised
  - Originally requested information if hearings were not held within the last three years.
    - This language has been removed as hearings are required by statute.
    - Additional update to confirm that the public was actually invited to combined hearings.
Section 5 - Revisions

• CSBG Eligible Entities
• No New Items
• 5.1. CSBG Eligible Entities
  – No longer able to update first column
    • Data pulls from the CSBG Master List
• 5.3. Changes to Eligible Entities List – Revised
  – Originally a general question with an open narrative
  – Revised to table with specific questions
Section 5 - Revisions

• 5.3. Changes to Eligible Entities List – Revised

Original Wording

5.3. Changes to Eligible Entities List: Has the list of eligible entities under item 5.1 changed since the State's last State Plan submission?

Rewrite

5.3. Changes to Eligible Entities List: Within the tables below, describe any changes that have occurred to the Eligible Entities within the state since the last federal fiscal Year (FFY).
5.3a. Designation and Re-Designation
5.3b. De-Designations and Voluntary Relinquishments
5.3c. Mergers
Section 6 – New Items

- Organizational Standards for Eligible Entities
- 6.1a. CSBG Organizational Standards
- 6.1b. Alternative Organizational Standards [Attachment]
- 6.1c. Alternative Organizational Standards [Narrative]
- Originally included in 6.1.
  - Skip Logic applied
    - 6.1a. Required if using COE CSBG Organizational Standards
    - 6.1b. and 6.1c. Required if using alternative standards
Section 6 - Revisions

• 6.1. Choice of Standards – Revised for clarification

• 6.4a. Eligible Entity Exemptions
  – Originally a narrative
  – Updated to a table

<table>
<thead>
<tr>
<th>CSBG Eligible Entity</th>
<th>Exemption Provided</th>
<th>Description/Justification</th>
</tr>
</thead>
<tbody>
<tr>
<td>[Select an eligible entity from the dropdown]</td>
<td>[Select Yes or No]</td>
<td>[If Yes is selected, provide a narrative, 2500 characters]</td>
</tr>
</tbody>
</table>

ADD a ROW function Note: Rows will be able to be added for each additional exception.

• 6.5. Performance Target
  – Revised to include an option for Two Year plans
    • States would be able to revise during the second year
Section 7 - Revisions

• State Use of Funds
• No New Items
• 7.1a. Formula Description
  – Description will be used for definition purposes
• 7.2. Planned Allocation, 7.6. Allocated Funds, 7.9. Remainder/Discretionary Funds
  – Percentages combined should add to 100%
  – 7.6. now only allows for percentages
  – 7.2. and 7.9. only allow for estimated dollar amount
  – Separated for Year One and Year Two
    • States will be able to update during Year Two, as applicable
• 7.10. Remainder/Discretionary Funds Partnerships
  – Options were reordered
Section 8 - Revisions

• State Training and Technical Assistance
• No New Items
• General updates to allow for more clarification
  – Allowing responses for separate one- and two-year responses. (8.1. and 8.1a.)
  – 8.3. T/TA Partnerships – Revised
    • Character Limits Updated
Section 9 - Revisions

- State Linkages and Communication
- No New Items
- No attachments – updated character limits
- 9.9. Communication Plan – updated to include specific subject matters:

<table>
<thead>
<tr>
<th>Upcoming Public and/or Legislative Hearings</th>
<th>State Plan Development</th>
<th>Organizational Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td>State Accountability Measures Progress</td>
<td>Community Needs Assessments/Community Action Plans</td>
<td>State Monitoring Plans and Policies</td>
</tr>
<tr>
<td>Training and Technical Assistance (T/TA) Plans</td>
<td>ROMA and Performance Management</td>
<td>State Interagency Coordination</td>
</tr>
<tr>
<td>CSBG Legislative/Programmatic Updates</td>
<td>Tripartite Board Requirements</td>
<td></td>
</tr>
</tbody>
</table>
Section 10 - Revisions

- Monitoring, Corrective Action, and Fiscal Controls
- No New Items

10.1. Monitoring of Eligible Entities
  - No longer allows for an attachment
  - Tables separated by one- and two-year responses
  - Column 1 will pre-populate from CSBG Master List
  - Column 6 allows for End Date

10.8. – 10.10. Eligible Entity Designation, Termination and Re-Designation
  - Updated for clarification and to allow for skip logic.
Section 11 - Revisions

- Eligible Entity Tripartite Board
- No New Items
- 11.1. Tripartite Board Verification
- 11.2. Tripartite Board Updates
  - Options were added based on FY 2016 – FY 2017 CSP Responses
Section 12 – Revisions

• Individual and Community Income Eligibility Requirements
• No New Items
• 12.1. Required Income Eligibility
  – Narrative added to last option – “Varies by eligible entity”
CSBG Master List

• New Form within OLDC
• To be completed in FY 2019
• Separate from the CSP
• Only requires an update if:
  – Address changes
  – New designations, re-designations, de-designations, mergers, and terminations
Questions?