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
- <u>Dear Colleague CSBG State</u> <u>Plan Revision: Open Comment</u> <u>Period</u>
 - Released November 22, 2017









- The Paperwork Reduction Act Process
- CSBG Webinar Series
- CSBG State Plan Revisions







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 <u>Public</u> 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

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

GROUP B The following states are solely required to submit a SF-424M for FY2019, but may submit updates to their accepted plans				
Arkansas	California	Colorado	Hawaii	Idaho
Illinois	Indiana	lowa	Kentucky	Louisiana
Maine	Minnesota	Missouri	Montana	Nevada
New Mexico	New York	North Carolina	North Dakota	Ohio
Oklahoma	Pennsylvania	Rhode Island	Tennessee	Texas
West Virginia	Wisconsin			





CSBG State Plan Webinar Series continued

Webinar Title	Description	Date	Audience
Changes to CSP	A one-time webinar focused on the revisions made to the CSP	January 9	All states
State Plan Prep!	An annual webinar focused on refreshers to help you in completing your state plan	March 15	Group A
Button Down: Designation Letter(s), Authorizing Officials, Certifications	An annual webinar focused on requirements around the designation letter, authorizing officials, and certifications	April 17	Group A
Great! We Made It!	A one-time webinar focused on the final changes made to the CSBG State Plan	May 15	All states
Submitting the Plan!	An annual webinar focused on refreshers for submitting the CSBG State Plan in OLDC	June 20	Group A
Submitting the SF- 424M!	An annual webinar focused on refreshers for submitting the SF- 424M	June 21	Group B

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

Item No.	Item Title
1.3.	Designation Letter [Required]
2.3.	Legislation/Regulation
4.4.	Public Hearing Documentation [Required]
6.1b.	Alternative Organizational Standards [Required, as applicable]
10.2.	Monitoring Policies
15.1.	Lobby Certification
15.2.	Drug-free Workplace Certification
15.3.	Debarment Certification
15.4.	Environmental Tobacco Smoke





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. O One-Year OTwo-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 a 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

CSBG Eligible Entity	Exemption Provided	Description/Justification	
[Select an eligible entity from the dropdown]	[Select Yes or No]	[If Yes is selected, provide a narrative, 2500 characters]	
ADD a ROW function	on 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:

Upcoming Public and/or Legislative Hearings	State Plan Development	Organizational Standards
State Accountability Measures Progress	Community Needs Assessments/ Community Action Plans	State Monitoring Plans and Policies
Training and Technical Assistance (T/TA) Plans	ROMA and Performance Management	State Interagency Coordination
CSBG Legislative/Programmatic Updates	Tripartite Board Requirements	





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, dedesignations, mergers, and terminations





Questions?



