

**From:** [Wright-Solomon, Lisa \(HRSA\)](#)  
**To:** [Brammer, Josh J. EOP/OMB](#)  
**Cc:** [HRSA OMB PRA Officer](#)  
**Subject:** HRSA RESPONSE FROM MCHB: Block Grant Guidance Public Comment  
**Date:** Tuesday, January 12, 2021 9:28:06 AM  
**Attachments:** [Title V Updated Guidance CA Feedback 12-10-20.pdf](#)

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Josh,

We greatly appreciate your review of this ICR.

See below for program's response to the public comment. Please let us know if this response is acceptable to you. If so, we will upload the response into ROCIS.

Thanks!

Lisa

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To address California's comments, see the response below.

When completing its Annual Application/Annual Report, each state Title V Program has the discretion to determine the detail and scope for responding to this reporting. Current burden estimates were determined through discussion with several states to assess the minimum number of hours needed to meet the basic requirements of reporting. The Maternal and Child Health Bureau will continue to review burden estimates to ensure that they capture accurately the minimum number of hours needed to complete an Application/Annual Report. As for California's comments on specific changes, the responses are noted below:

- Comment: Regarding the proposed change to "Strengthen the narrative discussion on the State Systems Development Initiative (SSDI) grant and add a reporting form for annually assessing State Title V program capacity to access essential Maternal and Child Health data that supports timely program planning, monitoring, and evaluation", we fully support integration of the SSDI application process into the Title V reporting and application process and request that given this integration, the proposed form would only be needed in one of the applications.

**Response: Regarding the proposed change to the SSDI grant reporting, we agree with the commenter that the proposed reporting form for assessing State Title V program capacity to access essential MCH data should only be requested in one application. Consistent with this comment, beginning with the FY 2020 SSDI performance report that is due in spring 2021, MCHB has eliminated this data capacity report as part of the annual SSDI performance report.**

- Regarding the proposed change to "Enhance the annual narrative reporting to include a more robust description of the State Title V workforce capacity (e.g., number/types of Full-Time Equivalents, trends/shifts in Maternal and Child Health workforce, and key external partners) and professional development efforts, while providing resources to assist State Title V programs in their ongoing assessment of Maternal and Child Health workforce and training needs", we feel that these topics are already addressed throughout other areas of the report. The proposed expansion in reporting seems duplicative of information provided in the needs assessment, action plan and application narrative.

**Response: Regarding the proposed change to the enhance narrative reporting on State Title V workforce capacity, the goal for this narrative section is to reduce burden by having annual reporting about Title V workforce in one place rather than having this narrative duplicated across the annual reporting within the five population domains. It is the state's decision on how detailed and extensive reporting in this section will be.**

- Regarding the proposed change to “Expand the annual narrative reporting to include a descriptive analysis of the State Title V program’s capacity related to emergency planning and preparedness, with the intended purpose of enabling each state to better assess its capacity for responding to emerging public health threats and disasters that could potentially impact the Maternal and Child Health population”, we agree that this is a valuable section to add but additional staffing and time to build capacity in this area are needed.

**Response: Regarding the proposed change to narrative related to emergency planning and preparedness, it is the state Title V program’s decision on how detailed and extensive reporting in this section will be and will dependent on the roles that the Title V program plays in emergency planning and preparedness.**