

CSBG Dear Colleague Letter Updates on Accountability and Performance Management and the OMB Omni Circular

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Audience: [Community Services Block Grants \(CSBG\)](#)

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Community Services Block Grant

Dear Colleague Letter

**Re: Updates on CSBG Accountability and Performance Management and the OMB
Omni Circular**

Date: April 10, 2014

Dear Colleagues:

The CSBG Network and OCS have made tremendous progress since 2012 to develop and embrace new approaches to accountability and performance management. These new strategies for accountability and performance management will enable us to demonstrate the efficiency and effectiveness of our work to fulfill the purposes of the CSBG program: to fight poverty, to revitalize low-income communities, and to help poor families achieve self-sufficiency.

CSBG Network Feedback on Accountability and Performance Management Strategies:

OCS relies on your collaboration in order to continue to refine the accountability and performance management strategies developed in partnership with the CSBG Network: ***State and Federal Accountability Measures***, developed by the Urban Institute, are designed to strengthen State and Federal CSBG administrator accountability in achieving the overall goals of the CSBG program.

In a [Dear Colleague letter](#), dated February 28, 2014, OCS requested feedback from the CSBG Network on the clarity, appropriateness, and feasibility of these measures. Please submit your comments to CSGB-Feedback@Urban.org by April 11, 2014 (the extended deadline). We

expect implementation of these measures by FY 2016. OCS, along with the Urban Institute, will host future webinars and disseminate information about implementation of these measures. ***CSBG-Eligible Entity Organizational Standards***, developed by the Organizational Standards Center of Excellence at the Community Action Partnership, will strengthen the capacity of the more than 1,100 CSBG-eligible entities to fulfill their anti-poverty missions. On March 24, 2014, OCS published a [Dear Colleague letter](#) to request input from the CSBG Network on OCS's proposed approach for States and CSBG-eligible entities to implement these standards by FY 2016. Please submit your feedback on this approach to LaToya.Smith@acf.hhs.gov by April 25, 2014.

ROMA Next Generation / Revised CSBG Information System (Annual Reporting), an effort led by the ROMA Center of Excellence at NASCSP, is a new approach to measuring the impact of the Network on the lives of low-income individuals, families, and communities. This complex work encompasses designing a Theory of Change tool, adjusting the National Performance Indicators, and, ultimately, devising a new way to tell Community Action's anti-poverty success story. We appreciate your engagement in this challenging work. Please watch for more information in the coming months, as we review recommendations and time lines. We are targeting full implementation of new ROMA tools and reporting by FY 2016.

Inclusion of Accountability and Performance Management Information in Future Year State Plans and Annual Reports:

OCS understands that States are beginning to develop State Plans and applications for FY 2015 funding, due on September 1, 2014. States may have concerns about whether and how to integrate the new accountability and performance management strategies into their plans.

States will not be required to include the CSBG Organizational Standards, the State Accountability Measures, or the new ROMA reporting requirements in their applications and State Plans until FY 2016. We encourage States to prepare for implementation of these accountability and performance management strategies for FY 2016 and take advantage of training and technical assistance opportunities in the coming months and during FY 2015.

OMB Omni Circular:

On December 26, 2013, the Office of Management and Budget (OMB) published a [final rule](#) on the Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (78 FR 78590). This rule, referred to as the Super or Omni Circular, supersedes and streamlines the requirements from several OMB circulars, including A-110, A-122, and other audit and grant-related OMB-guidance.

The OMB Omni Circular will go into effect for States and other recipients of Federal funding when Federal agencies publish agency-specific rules, which OMB expects will be by December 2014.

In the coming months, additional guidance on implementation will be provided to the CSBG Network. We also encourage you to learn about the OMB guidance through training offered by the Community Action Program Legal Services (CAPLAW) and other resources. Questions regarding CSBG can be addressed by your assigned OCS Division of State Assistance [program specialist](#). We value your feedback and look forward to hearing from you.

Thank you for your continued partnership in our shared work to fight poverty in America.

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