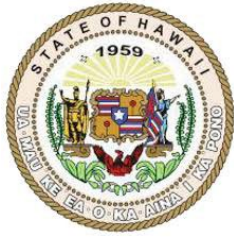




**OFFICE OF COMMUNITY SERVICES (OCS)  
DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS (DLIR)  
STATE OF HAWAII**

**COMMUNITY SERVICE BLOCK GRANTS (CSBG)  
POLICIES AND PROCEDURES  
(As of October 2025)**

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**COMMUNITY SERVICE BLOCK GRANTS (CSBG)  
POLICIES AND PROCEDURES  
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## **Purpose**

The purpose of the Hawaii Community Services Block Grant (CSBG) Policies and Procedures Manual is to establish guidelines and standards to ensure consistency in the administration of CSBG in Hawaii. It also provides references to federal and state laws, rules, and regulations related to the CSBG program.

## **CSBG Overview**

CSBG was established by Congress in the Economic Opportunity Act of 1964 as part of the War on Poverty. The purpose was to provide federal funding to local Eligible Entities to deliver a range of services to assist low-income families and individuals at or below 125% of the current Federal Poverty Level for Hawaii<sup>1</sup> or the highest Federal Poverty Level authorized by Congress. These programs aim to reduce poverty, revitalize low-income communities, and empower low-income families and individuals to become fully self-sufficient through community action.

## **The Promise of Community Action**

Community Action changes people's lives, embodies the spirit of hope, improves communities, and makes America a better place to live. We care about the entire community, and we are dedicated to helping people help themselves and each other.

CSBG has three (3) national goals:

1. Individuals and families with low incomes are stable and achieve economic security.
2. Communities where people with low incomes live are healthy and offer economic opportunity.
3. People with low incomes are engaged and active in building opportunities in communities.

CSBG is administered through the U.S. Department of Health and Human Services, Administration for Children and Families, Office of Community Services (Federal OCS). As of January 2018, Hawaii is a part of Region IX. The current applicable Federal regulations are the CSBG Act<sup>2</sup>, Office of Management and Budget (OMB) Uniform Grant Guidance<sup>3</sup>, and Federal OCS Policy and Guidance<sup>4</sup>. All submissions to Federal OCS are made through the On-Line Data Collection System (OLDC) in Grant Solutions.<sup>5</sup>

The CSBG Network nationwide is made up of:

- Federal OCS
- CSBG State Offices
- CSBG Eligible Entities
- CSBG State Associations – Most states have a State Association who works with Federal OCS, State Office, and national partners (listed below) on behalf of the eligible entities in the state. The size and activities of the State Associations vary by state. Hawaii's State Association is the Hawaii Community Action Program Director's Association (HCAPDA). HCAPDA has monthly conference calls and invites OCS to participate to keep informed of the activities of each eligible entity and share any program changes or information that may be useful.
- Regional Performance Innovation Consortia (RPIC) – Regional organization for State Associations. Funded by Federal OCS to support ongoing state, regional, and national training and technical assistance. Hawaii is part of Region 9, which is led by the California Community Action Partnership Association

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<sup>1</sup> <https://aspe.hhs.gov/poverty-guidelines>

<sup>2</sup> Current CSBG statute – 42 USC 9901 et seq. or Public Law 105-285 Sec. 201; Block Grant statute – 45 CFR 96.30

<sup>3</sup> 2 CFR 200 fully adopted by HHS effective October 1, 2025.

<sup>4</sup> All Federal OCS policy and guidance are online at <https://www.acf.hhs.gov/ocs/resource/policy-and-guidance-0>

<sup>5</sup> <https://home.grantsolutions.gov>

(CalCAPA). The RPIC has monthly conference calls that OCS participates in at the request of HCAPDA.

- National Association of State Community Service Programs (NASCS) – The national organization for the State Offices. NASCS is the main training and technical assistance provider for the State Offices and hosts quarterly conference calls and two conferences a year (Spring/Fall). Hawaii is part of Region 5.
- Community Action Partnership – The national organization for the eligible entities. Mainly provides training and technical assistance for the CAAs and State Associations, but also provides resources and tools for State Offices.
- Community Action Program Legal Services Inc. – Legal and financial resources for the eligible entities. Does not often deal with State Offices.
- National Community Action Foundation – Lobbying organization for the CAAs and State Associations. States are not members and CSBG funds cannot be used to pay for lobbying activities.
- Association of Nationally Certified ROMA Trainers (ANCRT) – National organization that certifies ROMA trainers and implementers and provides ongoing training for ROMA professionals.

Points of contact are listed in Appendix 1.

### **CSBG in Hawaii**

Each county in Hawaii has one Community Action Agency (CAA) responsible for providing these services. They individualize services and programs based on the needs specific in their respective county. The four agencies are:

Honolulu Community Action Program, Inc. (HCAP)  
1132 Bishop Street, Suite 100  
Honolulu, Hawaii 96813

Hawaii County Economic Opportunity Council (HCEOC)  
47 Rainbow Drive  
Hilo, Hawaii 96720

Maui Economic Opportunity, Inc. (MEO)  
99 Mahalani Street  
Wailuku, Hawaii 96732

Kauai Economic Opportunity, Inc. (KEO)  
2804 Wehe Road  
Lihue, Hawaii 96766

The Office of Community Services (OCS) in the Department of Labor and Industrial Relations has been designated by the Governor of the State of Hawaii as the lead agency for the administration of CSBG in the State of Hawaii. Any change in OCS's Executive Director requires a new designation letter from the Governor. See Appendix 2 for current designation letter.

OCS, in conjunction with the four local CAAs, develops a biannual CSBG State Plan to oversee and monitor the work of the CAAs at all stages of the annual CSBG grant, and to report on the program's performance to Federal and State authorities. OCS is required to present this plan to the legislature and public for hearing, then submits the Plan to Federal OCS for acceptance and approval.

### **CSBG Eligible Entities**

The CAAs were established as part of the CSBG Act and designated the eligible entities for CSBG funds. When CSBG was reauthorized, the definition of “eligible entity” stated that all eligible entities (CAAs) existing prior to enactment would continue to be the CSBG eligible entities.<sup>6</sup>

To qualify as a CSBG eligible entity, a CAA, nonprofit, or public organization must meet certain criteria. A nonprofit or public organization can only apply to be an eligible entity in the event that one of the CAA is terminated (see page 12, Corrective Action, Reduction of Funds, and Termination).

### **Client Eligibility**

Unless otherwise stated by OCS or Federal OCS, clients/households must meet the required 125% Federal Poverty Level (FPL), in accordance with the CSBG Act. However, CAAs may determine which documents are collected to determine eligibility and the timeframe in which eligibility can be determined (i.e., a client met the 125% FPL for the past 3 months). OCS recognizes that Congress and Federal OCS may allow a temporary increase in the FPL due to a state of disaster or emergency, which will allow for additional persons to become eligible to receive CSBG services. Such extended eligibility will be allowed pursuant to the specific provisions of the Congressional or Federal OCS guidelines.

Since the COVID-19 pandemic, CSBG grant recipients and CSBG CAAs are able to continue to apply a higher eligibility rate of 200% of the current Federal Poverty Level as approved by Congress through numerous Continuing Resolutions. This increase in eligibility ensured broader access to services for low-income individuals and families.

### **Tripartite Board**

As required by Section 676B(a) of the CSBG Act, all eligible entities must have a tripartite board that fully participates in the development, planning, implementation, and evaluation of the CSBG program to serve low-income communities. The tripartite board must be composed as follows:

- $\frac{1}{3}$  elected public officials, holding office on the date of selection, or their representatives. If the number of such elected officials reasonably available and willing to serve on the board is less than  $\frac{1}{3}$  of the membership of the board, membership on the board of appointive public officials may be counted in meeting the requirement.
- Not fewer than  $\frac{1}{3}$  representative of low-income individuals and families chosen by a democratic selection process. The representative must be a resident of the neighborhood that he or she represents.
- The remainder are officials or members of business, industry, labor, religious, law enforcement, education, or other major groups and interests in the community served.

Board minutes/packets shall be submitted to OCS for review to confirm the tripartite board membership requirement is met and the board is involved in the eligible entity’s activities as required by the CSBG Act.

CAAs shall fill board vacancies within six months of occurrence. If unable to do so, the CAA must notify OCS that a good-faith effort is being made, and OCS shall grant an additional six-month period to fill the vacancy.

During a state of emergency, disaster, pandemic, or crisis, CAAs shall notify OCS in writing of board vacancy status on a quarterly basis and will actively work to fill the position within 90 days. If the position cannot be filled within 90 days of the vacancy occurring, then the CAA will submit to OCS an explanation and action plan for filling the vacancy. CAAs may request, subject to OCS’s approval, an extension to the term of office for the incumbent board members.

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<sup>6</sup> 42 USC 9902 (Public Law 105-285, Section 673(1)(A))

### Child Support Services Referral

Eligible entities must inform custodial parents in single-parent families that participate in program, activities, or services under CSBG about the availability of child support services and refer eligible parents to the child support offices of the State. To meet this requirement, the eligible entity will ask the client if he or she is the custodial parent in a single-parent family. If so, the following procedure will be included in the intake process.

- Inform the client about the availability of child support services
- Refer the client to the State Child Support Enforcement Agency and website (<http://ag.hawaii.gov/csea>)
- Provide the client access to the Child Support Enforcement Agency website (if appropriate)

### CSBG Assurances

In addition to working towards the national goals of CSBG, the eligible entities are required to coordinate activities and form linkages within the community. OCS is required to make assurances of these to Federal OCS as part of the State Plan. This includes:

- Developing linkages to fill identified gaps in service through the provision of information, referrals, case management, and follow up consultations
- Coordinate CSBG funds with other public and private resources
- Support innovative community and neighborhood-based initiatives related to the purposes of CSBG, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting
- Provide, on an emergency basis, supplies and services, nutritious foods, and related services as necessary to counteract conditions of starvation and malnutrition
- With OCS, coordinate and establish linkages between governmental and other social services programs to assure the effective delivery of services to low-income individuals and avoid duplication of services, including employment and training activities and Workforce Investment Opportunity Act programs
- With OCS, coordinate programs and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations

The full list of programmatic assurances included in the State Plan is attached as Appendix 3.

### Procurement

Each CAA shall ensure their agency has policies and procedures for procurement that align with federal regulations (2 CFR 200) and state regulations (HRS Chapter 103F, Cost Principles).

### Funding

Each CSBG grant constitutes two Federal Fiscal Years (FFY). Each FFY runs from October 1 – September 30. Funding is distributed through Federal OCS by allocation letters, which are emailed to the OCS point of contact. Generally, the allocations are quarterly, however, the receipt of the letter and frequency are determined by the Federal budget process and may be received dependent upon the passage of Continuing Resolutions.

Federal OCS mandates that at least 90 percent of CSBG funds be passed through to the CAAs. Ten percent may be retained by the State with a maximum of 5 percent for administration. OCS exercises its option to retain the other 5 percent for discretionary purposes.

Funds are distributed to the CAAs using a base plus formula allocation. The funding is based on the 1989 Community Services Administration Allotment + the most recent Small Area Income and Poverty Estimates<sup>7</sup> for the CAA's respective county = Total CAA allocation. The 1989 Community Services Administration Allotment is as follows:

- HCAP - \$679,548
- HCEOC - \$225,509
- MEO - \$197,053
- KEO - \$157,012

OCS allocates \$20,000 for each CAA out of the State's discretionary funds for the purposes of Training and Technical Assistance (T/TA). OCS also allocates \$13,000 for each CAA out of the State's discretionary funds to assist the CAA accomplish CSBG program goals or for uses associated with Section 675C(b)(1) of the CSBG Act.

OCS utilizes the remainder of the discretionary funds for NASCSP membership dues and conferences, host a statewide training for the CAAs and their board members and staff, and strengthen linkages with CAA partner organizations. Pursuant to the CSBG Act, the discretionary funds are allowed to be utilized for the purposes mentioned above and:

- Providing training and technical assistance to the CAAs
- Coordinating State or locally operated programs and services targeted to low-income children and families
- Supporting statewide coordination and communication among eligible entities
- Analyzing the distribution of CSBG funds to determine if the funds have been targeted to the areas of greatest need
- Supporting asset-building programs for low-income individuals
- Supporting innovative programs and activities to eliminate poverty, promote self-sufficiency, and promote community revitalization
- Supporting State charity tax credits as described in the CSBG Act Section 675C(c)
- Supporting other activities consistent with the purposes of the CSBG Act.

The CAAs shall be allowed to carry over any unexpended administrative and program funds from the first year of the grant to the second year. Discretionary funds allocated for T/TA shall be carried over from the first year of the grant to the second year at the discretion of the State.

In June preceding the start of the next Federal Fiscal Year (FFY), OCS shall estimate each CAAs carryover amount to include in the upcoming FFY CSBG contract. This shall ensure that each CAA continues to have access to the prior FFY's funds at the start of the new FFY and that each CAA can utilize the first-in, first-out methodology for CSBG funds since CSBG funds are available for obligation for two FFYs and states are awarded funds each FFY. OCS utilizes the current FFY actual award to estimate the award amount that is estimated to be received in the upcoming FFY. OCS also estimates each CAAs carryover amounts based on the average monthly expenditures for Administrative Costs, Program Costs, Training and Technical Assistance Costs, and Discretionary Funds. In July preceding the start of the FFY, OCS sends a letter to each CAA with the estimated carryover and the estimated funding per the Base + Formula allocation for the upcoming FFY. The CAAs provide budgets and goals and outcomes that represent their Community Action Plan in roughly 2 weeks, which are then included in the CAAs' CSBG contracts with OCS. Once the CSBG contracts are drafted, the CSBG contracts are then sent to the State of Hawaii Department of the Attorney

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<sup>7</sup> <https://www.census.gov/programs-surveys/saie/data/datasets.html>

General for legal review which takes anywhere from one to three weeks. When the Department of the Attorney General's office returns the contracts back to OCS, then OCS scans and emails the CAA's contract to the CAA, respectively, to review and print two hard copies to be signed, notarized, and returned to OCS within two weeks. When the signed and notarized contracts are received by OCS, OCS reviews the contracts to ensure that all the necessary signature lines are signed and that the dates following the signatures match the date of the notary. OCS also reviews the notary page to ensure that the number of pages includes the total number of pages in the contract and the CAA's corporate resolution, vendor compliance, and certificate of insurance. After OCS's review of the signed and notarized contracts, OCS sends the contracts back to the State of Hawaii's Department of Attorney General's office to approve and sign off on the contracts. The Department of Attorney General's office takes anywhere from one to three weeks to return the approved and signed contracts back to OCS. After OCS receives the contracts back from the Department of Attorney General's office, OCS's Executive Director signs and dates the contracts. Then OCS sends a scanned copy of the finalized contracts back to the CAA for their records. Initial contracts must be finalized and executed prior to the start of the FFY (October 1) annually to ensure continuity of CSBG services.

OCS assures that any CAA that received CSBG funding during the previous FFY will not have its funding terminated or reduced below the proportional share of funding the CAA received in the previous FFY unless, after providing notice and an opportunity for a hearing on the record, OCS determines that cause exists for such termination or such reduction, subject to review by the Secretary of the U.S. Health and Human Services as per Section 676(b)(8) of the CSBG Act.

#### Cost Allowabilities – Federal Regulations vs. State Regulations

CSBG funds shall be used by CAAs to reduce poverty, revitalize low-income communities, and to empower low-income individuals and families to become self-sufficient. Upon submission of the Hawaii CSBG State Plan, CSBG discretionary funds allocated to OCS shall be used to improve the CSBG program in Hawaii by providing and attending trainings and technical assistance opportunities.

The CSBG Act provides that CSBG funds shall not be used by the State, CAAs, or by any other person with which the State makes arrangements to carry out the purposes of this chapter, for the purchase or improvement of land, or the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility. "Permanent improvements" are work that materially increase the permanent value of the property, appreciably prolongs the life of the property, or puts the property in efficient operating condition rather than merely keeping the property in that condition. Permanent improvements are either equivalent to, or a subset of, capital expenditures. Work that falls into these categories may not be paid for with CSBG funds without a waiver from Federal OCS. Work that qualifies as maintenance and repair, and not capital expenditures, under the Uniform Guidance is not considered a permanent improvement and, therefore, is neither prohibited by the CSBG Act nor requires a waiver from Federal OCS to be an allowable CSBG cost. With respect to maintenance and repair costs, the Uniform Guidance provides that:

*Costs incurred for utilities, insurance, security, necessary maintenance, janitorial services, repair, or upkeep of buildings and equipment (including federal property unless otherwise provided for) which neither add to the permanent value of the property nor appreciably prolong its intended life, but keep it in an efficient operating condition, are allowable. Costs incurred for improvements which add to the permanent value of buildings and equipment or appreciably prolong their intended life shall be treated as capital expenditures.*

More information on the use of CSBG funds for permanent improvement can be found in CAPLAW's document on Property Issues last updated in September 2017.

When Federal and State regulations on allowable costs differ, the stricter regulation shall be followed. An example is that the Federal per diem rate guide for allowable transportation costs includes an allowance for



incidentals and tips. However, Hawaii State Cost Principles for Chapter 103F contracts does not allow reimbursement for tips. OCS shall follow the Hawaii State Cost Principles for Chapter 103F contracts since it is stricter than the Federal per diem guide.

### **CSBG Contract**

By October 1 annually, each CAA shall enter into a contract spanning one FFY with OCS to provide CSBG services to income eligible individuals and families. Contracts shall be effective as of October 1 and end September 30, with the option to extend the period of performance an additional 12 months. OCS shall perform a risk assessment (see Appendix 4 for risk assessment template) on each CAA prior to drafting contracts. OCS has an ongoing procurement exemption approved with “No Action” from the Chief Procurement Officer pursuant to the Hawaii Revised Statutes §3-141-503. The contract shall consist of:

- State of Hawaii Contract for Health and Human Services: Transactions Exempt from Chapter 103F, HRS, which shall specify the CSBG Catalog of Federal Domestic Assistance Number, CFDA #93.569
- State of Hawaii Contractor’s Acknowledgment
- CAA Corporate Resolution (*to be provided by CAA*)
- Certificate of Liability Insurance, which shall specify the contract number and name OCS as an additional insured (*to be provided by CAA*)
- Certificate of Vendor Compliance (Hawaii Compliance Express)
- Provider’s Standards of Conduct Declaration
- Department of Health and Human Services Certifications
- State of Hawaii Certificate of Exemption from Civil Service
- Attachment 1 – Scope of Services
- Attachment 2 – Time of Performance
- Attachment 3 – Compensation and Payment Schedule
- Attachment 4 – Insurance Requirements
- Attachment 5 – Work Program (*to be provided by CAA*)
- Attachment 6 – Budget (*to be provided by CAA*)
- Attachment 7 – General Conditions
- Attachment 8 – Special Conditions

Upon receipt of the final grant award for the current FFY, OCS shall provide the CAAs with the estimated allocation for the next year, which shall be based on the final grant award for the current FFY. The CAAs will provide a work program and budget based on the estimated allocation to OCS for use in the contract:

- Work Program (Attachment 5): Shall be reflective of the outcomes the CAA anticipates based on the National Performance Indicators (NPI) required in the CSBG Annual Report (see page 5, Program Reporting and Requirements, ROMA).
- Budget (Attachment 6): Shall be broken down between “Administrative Costs<sup>8</sup>,” “Program Costs,” “Equipment,” and “Training and Technical Assistance.” Items of cost shall be allowable, reasonable, necessary, and allocable pursuant to the State Cost Principles and 2 CFR 200. Costs, including salaries and fringe, shall be broken down by line item. Any equipment with a cost exceeding \$1,000 (per HRS Chapter 103F Cost Principles) and having a useful life of more than one year requires prior approval before purchase.

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<sup>8</sup> OCS policy has been to monitor expending of administrative funds as part of the agency-wide budget and ensure that administrative costs do not exceed 20 percent of the total agency-wide budget. OCS does not encourage a high percentage of CSBG funds being budgeted for administrative costs, however, it is allowable for CAAs to use 100 percent of CSBG funds for administrative costs (see Appendix 5).

Upon receipt of a grant award from Federal OCS, OCS shall issue each CAA with an allocation letter informing them of available funding for expenditure at present. Each grant award shall be distributed between the CAAs and OCS based upon the entity's percentage of Hawaii's total estimated grant award.

Roughly 90 days after the close of each FFY, once final cash requests are processed and final program reports are submitted, OCS shall begin finalizing each CAAs carryover from the prior FFY to begin executing a supplemental contract to update the CAAs contract amounts. OCS shall issue a letter informing each CAA of their carryover from the prior FFY.

A supplemental contract will also be executed, if necessary, should the final grant award differ from the previous FFY, or if the CAA requests to add new budget line item(s) to the budget (Attachment 6). Any change to the total contract amount or additional budget line(s) requires a supplemental contract. Every supplemental contract will require a new Attachment 5 (if necessary) and Attachment 6. Supplemental contracts have to undergo the same timeline as executing the initial CSBG contract.

Budget modifications occur when the CAA requests to reallocate fund within the existing budget line items, there is not change to the total contract amount, and there is no additional budget lines item(s) being proposed to be included in the CAA's Attachment 6. Budget modifications are allowable when necessary and approved by OCS. Budget modification requests can be sent by the CAA to OCS via email. OCS will respond with a budget modification letter that includes the revised budget and require signature as proof of acceptance by the requesting CAA on both the letter and the revised budget.

A flowchart of the allocation and contracting process is attached as Appendix 6.

As per Section 676(b)(7) of the CSBG Act, OCS and the CAAs will "permit and cooperate with Federal investigations undertaken in accordance with Section 678D" of the CSBG Act.

### **Fiscal Reporting and Requirements**

OCS operates on a reimbursement payment system. CAAs shall submit their Fiscal Report (Form 300), which is inclusive of a cash request, expenditure report, and general ledger, within 30 days of the end of each month. A final Fiscal Report is due within 60 days of the end of the contract period. See Appendix 7 for Fiscal Report template. OCS program staff will review the Fiscal Report for allowability of costs, sign it for approval, and submit to the OCS fiscal staff then OCS's Executive Director to process payments as expeditiously as possible to ensure reimbursement is made to the requesting CAA within 30 days.

Expenditures may exceed budgeted line items by no more than the greater of \$500 or 5 percent of the budgeted amount per Attachment 3 of the CSBG contract. Any amount in excess will require OCS's approval and an amendment to the budget.

An annual audit is required pursuant to Subpart F of the OMB Uniform Guidance (2 CFR 200). The audit is due to OCS within nine (9) months after the end of the CAA's audit period. If a CAA receives an audit finding requiring a management decision by OCS, then OCS will send the CAA a formal letter requesting a corrective action plan and timeline in which corrective action must be implemented. OCS will coordinate with the CAA to develop a corrective action plan and timeline. OCS will offer training and technical assistance to help the CAA correct any audit findings. If the audit finding is not corrected in the timeline agreed upon by the CAA and OCS, or by the next audit report, whichever comes first, the CAA will be placed on a Technical Assistance Plan (TAP). The TAP will include the planned corrective activities, inclusive of training and technical assistance, the progress over time, responsible parties, and timeframe for completion. The TAP must be submitted by the CAA to OCS within 60 calendar days of written notification that it is required. OCS shall respond within 30 calendar days of receipt of the TAP and indicate whether the

TAP is approved for action or will not meet the deficiency. OCS and the CAA will work collaboratively on the TAP to ensure appropriate training and technical assistance is provided and the audit finding is corrected.

OCS shall submit all required fiscal reports to Federal OCS in a timely manner. OCS is responsible for submitting two different pieces of fiscal information:

- Final Fiscal Report (SF-425): Shall be submitted to Federal OCS within 90 days of the end of the FFY. OCS shall consolidate the expenditures reported by the CAAs in their submitted Fiscal Reports and report based upon Hawaii's total expenditures. The timely submittal of this report has previously been an audit finding for OCS, which has been corrected. The OCS Program Specialist is responsible for submission of the report into OLDC after reconciling program and CAA records with OCS fiscal.

### **Program Reporting and Requirements**

To measure each CAAs progress towards meeting outcomes stated in each CAAs Attachment 5 "Scope of Work" in their CSBG contract, each CAA shall submit quarterly program progress reports to OCS within 30 days of the end of each quarter.

OCS reserves the right to withhold payment until a program report is received. Any reimbursements requested by the CAA shall be held should a program report be outstanding after the following dates:

- Quarter 1 (October 1 – December 31) – January 31
- Quarter 2 (January 1 – March 31) – April 30
- Quarter 3 (April 1 – June 30) – July 31
- Quarter 4 (July 1 – September 30) – October 31
- Final (can be combined with Quarter 4) – November 30

Once the outstanding program report is received, any held monthly fiscal reports shall be immediately sent to OCS's fiscal team for further review and processing for reimbursement.

OCS shall report the outcomes in the CSBG Annual Report noted above. During the submission of the Annual Report, OCS may request further information from the CAAs as needed. To the extent possible, OCS will ensure that the Attachment 5, program report, and Annual Report align.

### **ROMA**

The data collected and reported in the program reports shall be reflective of the CAAs' use of the Results Oriented Management and Accountability (ROMA) system. ROMA was developed by the CSBG network and its use was mandated in 1998. While states have the option of utilizing a similar system of their choosing, Hawaii has continuously opted to use ROMA in its CSBG State Plan.

ROMA employs a cycle of implementation for services to low-income individuals, families, and communities. It includes a community needs assessment, use of needs assessment data to plan service strategies and projected results, implementation of strategies and services, observation and report on progress, and analysis of data according to original benchmarks. See Appendix 9 for ROMA cycle.

An important component of ROMA are the NPIs, which create a set of measures to track CAA performance. The use of the NPIs through the FFY demonstrate the use of ROMA in the CAA's services. The full list of NPIs can be found in Appendix 8 as part of the CSBG Annual Report.

### **Community Needs Assessment, Strategic Plan, and Community Action Plan**

Per the CSBG Act, each CAA is required to complete a Community Needs Assessment (CNA) and have it approved by the Board of Directors at least once every three years. The CNA is an integral part of the

ROMA cycle and must include both qualitative and quantitative data, and contain information collected directly from low-income individuals and key sectors of the community. Each CAA shall provide OCS with a copy of their respective Community Needs Assessment upon completion and approval by the CAA's Board of Directors. If a CAA makes any changes or updates, OCS shall be notified by the end of the FFY. CAAs do not necessarily need to develop an entirely new CNA. However, the CAA still needs to develop and collect quantitative and qualitative data from the community and low-income individuals and households to inform any updates to the existing CNA, and have their Board of Directors review and approve the CNA once every three years.

The CNA is used to inform the CAA's Strategic Plan. The Strategic Plan must be approved by the Board of Directors every five years. The purpose of the Strategic Plan is to set priorities and outcomes for the CAA over a five-year period. As part of each on-site monitoring visit, OCS will evaluate board meeting minutes to ensure that the CAA's Board of Directors receive annual updates on the CAA's progress in meeting priorities and outcomes in the Strategic Plan.

Per Section 676(b)(11) of the CSBG Act, the CAAs shall provide OCS with a copy of their respective Community Action Plan (Attachment 5 "Scope of Work" in the CSBG contract) before October 1 annually in order to execute the initial CSBG contract. The Community Action Plan is the plan for how the CAA will achieve the goals set by the Strategic Plan and meet the needs identified in the CNA. The Attachment 5 included in the CSBG contract is acceptable as an annual update to the Community Action Plan. OCS shall request for the Community Action Plan from each CAA by July for the upcoming FFY. OCS will compare each CAA's Community Action Plan to their most recent Strategic Plan and CNA to ensure that the Community Action Plan aligns with the goals set by the Strategic Plan and meets the needs identified in the CNA. If a CAA makes any changes or updates to the Community Action Plan (Attachment 5 "Scope of Work"), OCS must be notified prior to the end of the FFY and OCS must execute a supplemental contract to reflect the changes to the Community Action plan in the CAA's CSBG contract.

#### Organizational Standards

The CSBG Organizational Standards were established by Information Memorandum (IM) 138, which can be found in Appendix 10. As part of the performance management and accountability system for CSBG, the purpose is to ensure that CSBG eligible entities have the capacity to provide high-quality services to low-income individuals and communities.

Compliance with the Organizational Standards shall be assessed annually by the State and reported to Federal OCS in the CSBG Annual Report. OCS shall integrate Organizational Standards assessment into regular CSBG monitoring procedures using the Community Action Partnership's (CAP's) State Assessment Tool for Organizational Standards. CAP's State Assessment tool notes acceptable documentation and is attached as Appendix 11. OCS shall utilize CAP's State Assessment Tool for Organizational Standards as part of the on-site monitoring procedures with the CAAs. When OCS works with each CAA to set up an on-site monitoring date, OCS shall request fiscal and program documents to review that may support that the CAA meets Organizational Standards along with other monitoring requirements. OCS shall review the documentation and inform the respective CAA of the level of compliance and areas of improvement within 60 days after the date of the monitoring visit. OCS shall work with the CAA to create a timeline to ensure that any deficiency is brought into compliance before the end of the FFY.

OCS staff shall provide any necessary training and technical assistance at any CAA's request, or if there is any Organizational Standards are not met. This includes, but is not limited to, a walkthrough of the Organizational Standards to ensure that the documentation on hand meets requirements or clarifying any of the standards.

### **CSBG Annual Report**

When OCS receives the SmartForms for the prior FFYs CSBG Annual Report Modules from Federal OCS, OCS shall immediately send each CAA their CSBG Annual Report Modules via email to complete and send back to OCS by the deadline that OCS provides. OCS is required to complete and upload the CSBG Annual Report Modules to OLDC on or before March 30 annually. Since each CAA's quarterly program progress report consists of outcomes reflective of the NPIs included in the Attachment 5 "Scope of Work" of the CAA's CSBG contract, the CAA's may utilize the final quarterly program progress report for the prior FFY to complete the appropriate CSBG Annual Report Module. During review of the CSBG Annual Report Modules, OCS may request further information from the CAAs as necessary to ensure each CSBG Annual Report Module is complete and contains accurate data.

Per State Accountability Measure 5S(ii), OCS will provide written feedback to each CAA regarding the CAA's performance in meeting ROMA goals, as measured through NPI data within 60 calendar days after Hawaii's CSBG Annual Report is submitted on OLDC.

### **Federal Investigations Policies**

OCS will "permit and cooperate with Federal investigations undertaken in accordance with Section 678D" of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act.

### **Monitoring**

#### **OCS Performed Monitoring**

Per Section 678B of the CSBG Act, OCS is required to monitor each CAA on-site at least once every three years (and during the first year for a newly designated CSBG eligible entity). The purpose of monitoring is to verify compliance with applicable rules and regulations, assess the overall health of the CAA, and to identify areas where training and technical assistance may be necessary. When possible, monitoring shall coincide with a Board of Directors meeting and be completed in one business day. Monitoring shall be inclusive of administrative, programmatic, and fiscal elements.

While the on-site monitoring includes the areas covered by the Organizational Standards, it goes beyond the documentation requirement with observation of how those requirements are implemented and put into practice in the CAA's everyday operation.

Prior to conducting an on-site monitoring visit, OCS shall request specific fiscal documents for fiscal staff review, and program documents to prove the eligible entity may meet Organizational Standards as well as other monitoring requirements. OCS shall review the risk assessment, Organizational Standards met, recent Board of Directors minutes and packets, most recent audit, and program and fiscal reports to identify any areas requiring attention. With the breadth of information provided to OCS, many areas of monitoring can be pre-assessed, saving time for both the CAA and OCS.

OCS shall issue a monitoring report to the CAA within 60 days. The report shall indicate areas of strength and weakness based on OCS' observations. Should corrective action be required, the monitoring report shall also specify the timeline for compliance and available training and technical assistance.

#### **Federal OCS Performed Monitoring**

Federal OCS conducts monitoring of several states each year. Since FFY 14, an IM has been issued annually to inform states of the schedule for that year. Prior to FFY 14, a schedule was released once every three years. The following items are the criteria used to determine which states will be assessed<sup>9</sup>:

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<sup>9</sup> Dear Colleague Letter ACF-OCS-CSBG-DCL-24-18 Monitoring Schedule FY24

- Criteria 1: States that have never been reviewed by (federal) OCS or significant time has elapsed since the state was last reviewed. States that have never been reviewed are given a high priority score.
- Criteria 2: Analysis of routinely available program monitoring information. These may include unresolved findings noted in previous monitoring reports, turnover in state CSBG staff, OIG findings for the state or its eligible entities, revocation of federal funding for other programs at eligible entities, and complaints received by DCA.
- Criteria 3: CSBG funding allocation per state.
- Criteria 4: CSBG drawdown analysis.
- Criteria 5: Analysis of past findings as reported in accordance with Office of Management and Budget single audit requirements. This includes a trend analysis of all CSBG findings reported in the state, eligible entities, and sub-recipients if applicable.

The review includes procedures and practices for administrative, fiscal, and program operations. The Federal OCS reviewers evaluate the State's eligible entity monitoring procedures and compliance of state-level assurances, administrative, fiscal, program, and governance requirements. The review of the monitoring procedures also encompasses the eligible entity's compliance with state-level assurances.

Hawaii was last monitored September 22-26, 2014. The draft report, received on January 30, 2017, and OCS's response are attached as Appendix 12. No response from Federal OCS has been received to date.

#### **Corrective Action, Reduction of Funds, and Termination**

As a result of Organizational Standards review or monitoring, OCS may require corrective action. OCS will take the steps prescribed in IM 116 with the inclusion of the Technical Assistance Plan in IM 138. IM 116 is attached as Appendix 13.

#### **Corrective Action**

OCS will identify any deficiencies in writing as part of the on-site monitoring report or review of Organizational Standards. If appropriate, OCS will offer training and technical assistance to help the CAA correct the identified deficiency. If the deficiency is not corrected in the timeline agreed upon by the CAA and OCS, the CAA shall be placed on a Technical Assistance Plan (TAP).

The TAP shall include the planned corrective activities, inclusive of training and technical assistance, the progress over time, responsible parties, and timeframe for completion. The TAP must be submitted by the CAA to OCS within 60 days of written notification that it is required. OCS shall respond within 30 days of receipt of the TAP and indicate whether the TAP is approved for action or will not meet the deficiency. OCS and the CAA shall work collaboratively on the TAP to ensure appropriate training and technical assistance is provided and the deficiency is corrected.

Should the TAP not be met, a Quality Improvement Plan (QIP) shall be required. The development of a QIP shall follow the same process of a TAP.

#### **Reduction of Funds and Termination**

Should the QIP not be met, OCS may exercise the right to reduce the funds or terminate the CAA's status as a CSBG eligible entity. OCS shall inform the CAA of its decision in writing and provide the opportunity for a fair hearing. The CAA has 30 days to request the hearing and the hearing shall proceed in accordance with Chapter 91, Hawaii Revised Statutes.

If OCS's decision as result of the fair hearing is to reduce or terminate funding, the CAA may exercise its right for federal review. Federal OCS review must be requested within 30 days of notification of the State's decision. OCS may not take any action during the 30-day request period or the time of Federal OCS review.

Both the CAA and OCS shall submit all documentation regarding the action to Federal OCS, which must be completed within 90 days.

#### **Designation of a New Eligible Entity**

In the event that a CAA is de-designated as a CSBG eligible entity, OCS will issue a Request for Proposals (RFP), pursuant to Chapter 103F, Hawaii Revised Statutes, to select a new provider for that geographic area. The RFP will be inclusive of all eligible entity requirements and may be issued during the period of Federal OCS review of the termination to minimize any potential lapse in service to the CSBG clients, however, no award shall be made until the review is completed. The terminated CAA may reapply for eligible entity status through the RFP process.

#### **Recordkeeping**

All CAA reports, submissions, copies of checks, and correspondence shall be kept by OCS sorted by year for seven years. OCS shall also maintain a grant file inclusive of the grant award letters, Federal OCS correspondence, and any other relevant documents for seven years from the close of the grant. Although the General Records Schedules issued by the Department of Accounting and General Services for Hawaii require retention for a maximum of six years for CSBG records, OCS practice has been to retain records for seven, which has been helpful in the event of staff turnover.

The CAAs shall maintain CSBG files for three years pursuant to Federal regulations.



## **COMMUNITY SERVICE BLOCK GRANTS (CSBG) POLICIES AND PROCEDURES**

### **Appendix 1**

### **Points of Contact for CSBG Network**



## CSBG Network Points of Contact (as of July 2025)

### Community Action Agencies

Organization	Contact
Honolulu Community Action Program (HCAP)	<p>Robert Piper Executive Director 1132 Bishop Street #100 Honolulu, HI 96813 Phone: (808) 521-4531 Email: <a href="mailto:rpiper@hcapweb.org">rpiper@hcapweb.org</a></p> <p>Alternate contacts: Lynnelle Hasegawa, Director of Finance (fiscal issues) Phone: (808) 447-5406 Email: <a href="mailto:lynnelleh@hcapweb.org">lynnelleh@hcapweb.org</a></p> <p>Grant Kogami, Interim Director of Planning, Program Development and Communications/Head Start Director (program issues) Phone: (808) 447-5403 Email: <a href="mailto:grantk@hcapweb.org">grantk@hcapweb.org</a></p> <p>Robin Fakaosi, Director of Community Services (program issues) Phone: (808) 447-5451 Email: <a href="mailto:robinf@hcapweb.org">robinf@hcapweb.org</a></p>
Hawaii County Economic Opportunity Council (HCEOC)	<p>Chad Hasegawa Executive Director 47 Rainbow Drive Hilo, HI 96720 Phone: (808) 731-7009 Email: <a href="mailto:chasegawa@hceoc.net">chasegawa@hceoc.net</a></p> <p>Alternate contacts: Aleksander Burko, Fiscal Clerk (fiscal issues) Phone: (808) 731-7007 Email: <a href="mailto:aburko@hceoc.net">aburko@hceoc.net</a></p> <p>Loke Kuamoo, Director of Operations (program issues) Phone: (808) 731-7009 ext. 203 Email: <a href="mailto:lkuamoo@hceoc.net">lkuamoo@hceoc.net</a></p>

Maui Economic Opportunity (MEO)	<p>Debbie Cabebe Chief Executive Officer 99 Mahalani Street Wailuku, HI 96793 Phone: (808) 243-4300 Email: debbie.cabebe@meoinc.org</p> <p>Alternate Contacts: Allison Springer, Senior Accountant (fiscal issues) Phone: (808) 249-2980 Email: allison.springer@meoinc.org</p> <p>Gay Sibonga, Chief Operating Officer (program issues) Phone: (808) 249-2990 Email: gay.sibonga@meoinc.org</p>
Kauai Economic Opportunity (KEO)	<p>MaBel Ferreiro-Fujiuchi Chief Executive Officer 2804 Wehe Road Lihue, HI 96766 Phone: (808) 245-4077 Email: keo@keoinc.org</p> <p>Alternate Contacts: Brigitte Correia, Fiscal Officer (fiscal issues) Phone: (808) 245-4077 x226 Email: bcorreia@keoinc.org</p> <p>Naomi Ikimaka, Deputy Director (program issues) Phone: (808) 245-4077 x238 Email: nikimaka@keoinc.org</p>

### Other Network Points of Contact

Organization	Contact
Federal Office of Community Services	<p>Yoselin Doyle Program Specialist Administration for Children and Families U.S. Dept. of Health and Human Services Office of Community Services Division of Community Assistance 330 C Street, SW, 5<sup>th</sup> Floor Mail Room 5425 Washington, DC 20201 Phone: (202) 401-4612 Email: yoselin.doyle@acf.hhs.gov</p>

Hawaii Community Action Program Director's Association (State Association)	Debbie Cabebe* Maui Economic Opportunity, Inc. 99 Mahalani Street Wailuku, HI 96793 Phone: (808) 243-4300 Email: debbie.cabebe@meoinc.org <i>*Each CAA Executive Director serves as lead for one year on a rotating basis</i>
RPIC – Region 9	Lawrence Hiner Director of Training & Technical Assistance California Community Action Partnership Association 2015 J Street, Suite 200 Sacramento, CA 95811 Phone: (916) 443-1721 ext. 130 Email: lhiner@calcapa.org
NASCSP	Cheryl Williams Executive Director 1140 3 <sup>rd</sup> St. NE Suite 200 Washington, DC 20002 Phone: (202) 370-3657 Email: cwilliams@nascsp.org  Hugh Poole CSBG Director Same address as above Phone: (202) 370-3663 Email: hpoole@nascsp.org  Lauren Johnson CSBG Program Manager Same address as above Phone: (202) 370-3653 Email: ljohnson@nascsp.org
Community Action Partnership	Denise Harlow Chief Executive Officer 1020 19 <sup>th</sup> Street NW Suite 700 Washington, DC 20036 Phone: (202) 595-0660 Email: dharlow@communityactionpartnership.com
CAPLAW	Community Action Program Legal Services, Inc. 178 Tremont Street, 10 <sup>th</sup> Floor Boston, MA 02111 Phone: (617) 357-6915 Email: caplawinfo@caplaw.org
National Community Action Foundation	David Bradley Chief Executive Officer P.O. Box 78214 Washington, DC 20013 Phone: (202) 842-2092 Email: info@ncaf.org

ANCRT	Barbara Mooney Director National Peer to Peer ROMA Training and Certification Project Association of Nationally Certified ROMA Trainers 243 E. High Street Waynesburg, PA 15370 Phone: (724) 852-2272 Email: <a href="mailto:barbaramooney@windstream.net">barbaramooney@windstream.net</a>
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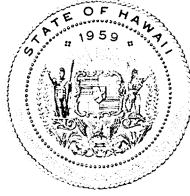


## **COMMUNITY SERVICE BLOCK GRANTS (CSBG) POLICIES AND PROCEDURES**

### **Appendix 2**

### **CSBG Designation Letter**

JOSH GREEN, M.D.  
GOVERNOR  
KE KIA'ĀINA



EXECUTIVE CHAMBERS  
KE KE'ENA O KE KIA'ĀINA

MAY - 2 2025

Ms. Cheryl Zuni, Interim Director  
Office of Community Services,  
Administration for Children and Families  
U.S. Department of Health and Human Services  
330 C Street, S.W.  
Washington, D.C. 20201

Aloha Ms. Zuni:

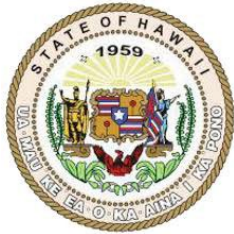
In accordance with the Community Opportunities, Accountability, and Training and Educational Services Act of 1998, Public Law 105-285, as Governor of the State of Hawai'i ("State"), I am designating the Office of Community Services (OCS) of the Department of Labor and Industrial Relations as the lead agency for the administration of the Community Services Block Grant program.

I am also designating Rey Domingo, OCS Executive Director, as the State designee responsible for ensuring the coordination of public and private resources for this program. Mr. Domingo may be reached at [rey.domingo@hawaii.gov](mailto:rey.domingo@hawaii.gov) or (808) 586-8680. His mailing address is: 830 Punchbowl Street, Room 420, Honolulu, Hawai'i 96813.

I intend for the above designations to continue until such time that it is modified or withdrawn in writing by me or a successor Governor. Thank you for your prompt attention to this matter.

Mahalo,

Josh Green, M.D.  
Governor, State of Hawai'i



## **COMMUNITY SERVICE BLOCK GRANTS (CSBG) POLICIES AND PROCEDURES**

### **Appendix 3**

### **CSBG Programmatic Assurances**

## **Community Services Block Grant Programmatic Assurances**

*Community Services Block Grant Reauthorization Act of 1998: P.L. 105-285*

As a part of the annual or biannual application and plan required by subsection 676(b) of Community Services Block Grant Act, as amended, (42 U.S.C. 9901 et seq.) (The Act), the designee of the Chief Executive of **the State hereby agrees to the Assurances in Section 676(b) of the Act -**

### **Programmatic Assurances**

(1) an assurance that funds made available through the grant or allotment will be used—

- (A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farm workers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals—
  - (i) to remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
  - (ii) to secure and retain meaningful employment;
  - (iii) to attain an adequate education, with particular attention toward improving literacy skills of the low-income families in the communities involved, which may include carrying out family literacy initiatives;
  - (iv) to make better use of available income;
  - (v) to obtain and maintain adequate housing and a suitable living environment;
  - (vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs; and
  - (vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to—
    - (I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and
    - (II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;
- (B) to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime,



such as—

- (i) programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and
    - (ii) after-school child care programs; and
  - (C) to make more effective use of, and to coordinate with, other programs related to the purposes of this subtitle (including State welfare reform efforts);
- (2) a description of how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in section 675C(b) in accordance with this subtitle, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of this subtitle;
- (3) information provided by eligible entities in the State, containing—
- (A) a description of the service delivery system, for services provided or coordinated with funds made available through grants made under section 675C(a), targeted to low-income individuals and families in communities within the State;
  - (B) a description of how linkages will be developed to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations;
  - (C) a description of how funds made available through grants made under section 675C(a) will be coordinated with other public and private resources; and
  - (D) a description of how the local entity will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting;
- (4) an assurance that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals;
- (5) an assurance that the State and the eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services, and a description of how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 101 of such Act, in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998;
- (6) an assurance that the State will ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such community;
- (7) an assurance that the State will permit and cooperate with Federal investigations undertaken in accordance with section 678D;

- (8) an assurance that any eligible entity in the State that received funding in the previous fiscal year through a community services block grant made under this subtitle will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b);
- (9) an assurance that the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations;
- (10) an assurance that the State will require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation;
- (11) an assurance that the State will secure from each eligible entity in the State, as a condition to receipt of funding by the entity through a community services block grant made under this subtitle for a program, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs;
- (12) an assurance that the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to section 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and a description of outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization; and
- (13) information describing how the State will carry out the assurances[676(b)(13)]



## **COMMUNITY SERVICE BLOCK GRANTS (CSBG) POLICIES AND PROCEDURES**

### **Appendix 4**

### **Risk Assessment Template**

# Risk Assessment - Community Action Agencies

## Instructions

The purpose of this instrument is to determine the level of compliance risk for each Community Action Agency. This tool will be completed by June, prior to the start of the upcoming Federal Fiscal Year (FFY), such that the risk assessments for FFY 2021 are completed in June 2020 before drafting the FFY 2021 contracts to determine if any additional visits, technical assistance, or training is needed for those Agencies which score higher and are determined to be at a higher risk level. The tool identifies various risk factors, each having an importance score corresponding to its prioritization by Hawaii OCS (higher score = higher priority).

If the Agency does not meet the requirement of a particular element, check it "No." This indicates that risk is present. A risk factor not checked either "Yes" or "No" is interpreted as "No."

For each section, the tool calculates a risk score expressed as a percentage. A higher score is bad.

For each row, it is important to fill out the "Rationale or Documentation" and "Source" fields to justify the scoring. The "Rationale or Documentation" field is a summary of the finding, and the "Source" field is the contractual item that relates to the finding, for example a section from the Terms and Conditions or the Scope of Work.

Subgrantee Information				
Agency Name:				
Contract #:				
Date of Last On-Site Monitoring Review:				
Date of Last Desk Review:				
Requirement		Importance Score (1= lower priority; 5= higher priority)	Requirement Met?	Rationale or Documentation
#	<b>Financial</b>			
1	The Agency's most recent single audit reported no significant financial findings.			
2	The Agency's most recent single audit reported no significant programmatic findings.			
3	The Agency resolved any single audit findings or exceptions from prior years.			
4	The Agency draws down funds in a timely manner.			
5	Key management or financial staff have administered the Agency's finances for more than two years with low turnover in these positions.			
6	The Agency spends funds within their budget limits and within the allowable costs.			
7	The Agency has an adequate multiplicity of funding sources (local, state, federal, foundation, private donor).			
8	The Agency's "Administrative Costs" are less than 20% of their total expenditures.			
9	The Agency has a low rate of errors to no errors in billings for unallowable costs or expenditures not in their budget.			
10	The Agency spends most (at least 80%) of the funds allocated for the current federal fiscal year.			
11	The Agency perpetually looks for other funding sources to supplement programs.			
		Section Risk Score	#DIV/0!	
#	<b>Planning and Evaluation</b>			
1	The strategic planning process is included in the Agency's policies.			
2	The Agency continues to actively look for new programs to administer among low-income communities.			
3	The Agency meets at least 90% of the Organizational Standards.			
4	The Agency submitted documentation on progress or completion of unmet Organizational Standards.			
5	The Agency has resolved any monitoring findings.			
		Section Risk Score	#DIV/0!	
#	<b>Programs and Services</b>			
1	The Agency submits quarterly and final program reports on time and accurately.			
2	The Agency submits fiscal reports on time and usually do not require revisions.			
3	The Agency's services consistently meet grant goals.			
4	The Agency integrates management of programs/services across sites.			
5	The Agency's community indicators or community outcomes accurately measure progress.			
6	The Agency's program(s) are not on probation or lost.			
		Section Risk Score	#DIV/0!	
#	<b>Internal Resources</b>			
1	The Agency has a succession plan for key staff.			
2	The Agency cross-trains key staff.			
3	The Agency conducts an organization-wide assessment on a regular basis to evaluate and improve programs and services.			
4	The Agency has stability among key staff (Executive Director, Program Managers, fiscal).			
5	The Agency routinely communicates with key staff (Executive Director, Program Managers, fiscal).			
6	The Agency conducts periodic salary surveys and implements any necessary changes.			
7	The Agency has reasonable and fair compensation plans comparable to othersized organizations of the similar nature in the same geographic area.			
		Section Risk Score	#DIV/0!	
#	<b>Relationships</b>			
1	The Agency participates in collaborative projects with state agencies, local governments, and non-profit or faith-based organizations that serve low-income people.			
2	The Agency advocates/educates for low-income people in communities.			

3	The Agency's relationships with funders are transparent and respectful.			
		Section Risk Score	#DIV/0!	
#	Leadership and Governance			
1	The Agency has written statements of qualifications for Board members.			
2	Board members have received poverty and/or community action training in the last three years.			
3	Board members spend time advocating for the Agency in the community.			
4	Bylaws specify term limits for each Board member.			
5	The Agency has clear policies on conflicts of interest.			
		Section Risk Score	#DIV/0!	
		Total Risk Score	#DIV/0!	
		Total Weighted Score	#DIV/0!	

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date



## **COMMUNITY SERVICE BLOCK GRANTS (CSBG) POLICIES AND PROCEDURES**

### **Appendix 5**

### **CSBG Use of Administrative Funds**



DEPARTMENT OF HEALTH & HUMAN SERVICES

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**ADMINISTRATION FOR CHILDREN AND FAMILIES**

370 L'Enfant Promenade, S.W.

Washington, D.C. 20447

JAN 27 1999

Mr. Thomas E. Green  
Assistant Director  
Office of Community Services  
Arkansas Department of Human Services  
Division of County Operations  
Post Office Box 1437  
Little Rock, Arkansas 72203

Dear Mr. Green:

I am writing to express the Federal Office of Community Service's (OCS) position on the use, by eligible entities, of Community Services Block Grant (CSBG) funds to coordinate with and/or administer other federally funded programs. My understanding from your September 10, 1998, letter and from communications with others in Arkansas is that the Arkansas State Auditor's Office has taken the position that OMB Circular A-122 prohibits such use. For the reasons stated below and in the Enclosure, OCS disagrees.

Historically, and continuing to the present day, the CSBG program has been required to support and coordinate a wide range of services designed to reduce poverty and develop self-sufficiency among individuals and families. The CSBG funds have always been used to pay for general CAA administrative expenses, e.g. personnel, salary, space, equipment, outreach, coordination and referral. In effect, these CSBG expenditures assist in the administration of the various programs operated by a CAA. The aforementioned operational procedures have been utilized since 1967, are still consistent with the requirements for addressing the causes of poverty, and ensures that CAAs remain innovative, relevant, and flexible in delivering programs and services to the needy.

The focus of the CSBG Act is not on providing narrowly defined services (as contrasted with LIHEAP, for example) but rather on "the strengthening of community capabilities for planning and coordinating a broad range of Federal, State, local and other assistance (including private resources) related to the elimination of poverty." Therefore, this assistance is to be used in a manner responsive to local needs and conditions (Section 673(2)(A) of the 1998 CSBG Act). In addition to Section (A), the CSBG Act further describes the means by which its purposes are to be accomplished:

(B) the organization of a range of services related to the needs of low-income families and individuals...

(C) the broadening of the resource base of programs directed to the elimination of poverty...

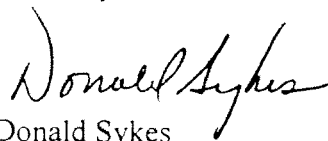
The CSBG Act also provides that the funds may be used by eligible entities to “make more effective use of, and to coordinate with, other programs related to the purposes of the Act, Section 676(b)(1)(C). The Act further requires the development of linkages “to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations.” Section 676(b)(3)(B).

The intent of the community action program and the legislation supporting the program is to provide services. Prohibiting CAAs, through the use of A-122, from providing support services for program functions is in violation of the legislation and the intent of the block grant. Community Action Agencies, by law, are required to provide and support outreach, coordination, emergency services and to generate additional resources for program services. Denying CAAs the ability to provide support for other programs will prevent them from meeting and fulfilling their obligations under the law.

It is clear from the CSBG Act (and established precedents over its long history) that the primary purpose of the Act is reflected in the multi-service structure of Community Action Agencies. This purpose is not inconsistent with any provision of OMB Circular A-122, Cost Allocation Principles, which applies to the use of CSBG funds by eligible entities, 42 U.S.C. 9904. Attachment A, Paragraph A(4)(b) of the Circular states, “Any cost allocable to a particular award or other cost objective under these principles may not be shifted to other Federal awards to overcome funding deficiencies, or to avoid restrictions imposed by law or by the terms of the additional resources or services available in other federally funded programs as required by the legislation.” Therefore, the use of CSBG funds for the purpose of enhancing, expanding, and coordinating with other federal programs does not constitute overcoming funding deficiencies of the other program. Similarly, the use of CSBG funds to pay for office space, salary or other administrative expenses and services of an agency employee (who coordinates and provides services to a number of different federally funded programs) does not violate the Circular’s prohibition on the use of CSBG funds regarding funding deficiencies.

In closing, the position of the Office of Community Services is that OMB Circular A-122 does not prohibit the use of CSBG funds, to coordinate, enhance, or augment other federal programs. (Please communicate this Office’s position on this issue to the State Auditor’s Office).

Sincerely,



Donald Sykes  
Director  
Office of Community Services

Enclosure



ENCLOSURE:

POINTS OF CONSIDERATION IN THE USE OF COMMUNITY SERVICES BLOCK  
GRANT FUNDS TO SUPPORT PROGRAMS OPERATED BY LOCAL CSBG PROVIDERS

- Federal legislation has always supported the use of CSBG funds to provide administrative services to other programs operated by CAAs.
- CSBG funds are effective, flexible federal grant funds, which support a broad range of other Federal, State and local, (public and private) initiatives aimed at reducing the causes and effects of poverty.
- With the Reauthorization of the CSBG Act in 1994, a provision was included which stipulates that the OMB Costs Principles apply to recipients of CSBG funds. Therefore, OMB Costs Principles contained in A-122 and A-87 is applicable. These principles address the manner in which allowable costs are to be allocated not whether legitimate costs of carrying eligible CSBG activities are allowable.
- The OMB cost principles do not define the eligible activities for the use of CSBG funds. The program legislation and administrative requirements define the use of CSBG funds.  
Examples:
  1. Legislation for the Low-Income Home Energy Assistance Program (LIHEAP) has a 15 percent administrative cost limitation. No funds from other Federal sources can be shifted to avoid restrictions imposed by the requirements of the law or the terms of the award. However, this does not prohibit a CAA from using CSBG funds to operate separate heating or cooling activities to address other local needs not addressed by LIHEAP. Moreover, this is not considered as duplicated services or supplementing funding deficiencies.
  2. Under the Community Food and Nutrition Program (CFN), States are administratively prohibited from using CFN funds to defray State administrative costs. These funds are passed through by the State for statewide CFN activities; however, the administrative costs of the CFN Program are primarily supported by the CSBG Program.
- CSBG funds constitute a small percentage, less than eight percent, of the funds available to local entities. CSBG funds allow subgrantee agencies to maintain current services, to create new initiatives, augment existing resources and extend relatively scarce or restricted services, available from other programs, to clients who would not otherwise be served.

Examples:

1. In New Hampshire and other states many CAAs use nearly 100 percent of the CSBG funds for administrative support of other social services programs for both public and private sources.
2. In California, one agency uses its CSBG funds (approximately \$325,000) for administrative support of some 30 other programs (all of which address the purposes of the CSBG Act). The small amount of CSBG funds supports an agency budget of over \$8,000,000.

Use of these funds, as indicated in the examples, is one of the most important aspects of the CSBG Program. Flexible use of funds and the ability of State and local agencies to use the funds to support and develop partnership between States, local and private agencies, and CAAs fulfill the intent of the CSBG Act.

- Inappropriate interpretation and application of A-122, Attachment A(4)(b), in a restrictive manner would be a mistake and prohibit CAAs from meeting the expressed requirements of the CSBG legislation. Attachment A states that any costs allocable to a particular award or other costs objective under these principles may not be shifted to other Federal awards to overcome funding deficiencies.

The OCS position is that CSBG funds are not being used to overcome deficiencies in other programs but are being utilized to assist in providing better and expanded services through administrative support, e.g. personnel, office space, outreach, case management, referral, generation of additional resources and coordination of other services. Each of which is permitted under the legislation and is required to meet the intent of the CSBG Act.

- Many of the problems associated with the implementation of OMB Cost Principles and cost accounting issues would not exist if State and CAAs were to utilize indirect cost rates and an appropriate cost allocation plan. Indirect costs rates can be established by the Federal Agency with the largest amount of direct grant funds going to the CAA. CAAs Which do not have direct Federally funded programs should negotiate with their auditors And State Comptroller's Office to establish indirect cost rates for the CAA (refer to OCS Information Memo #20).

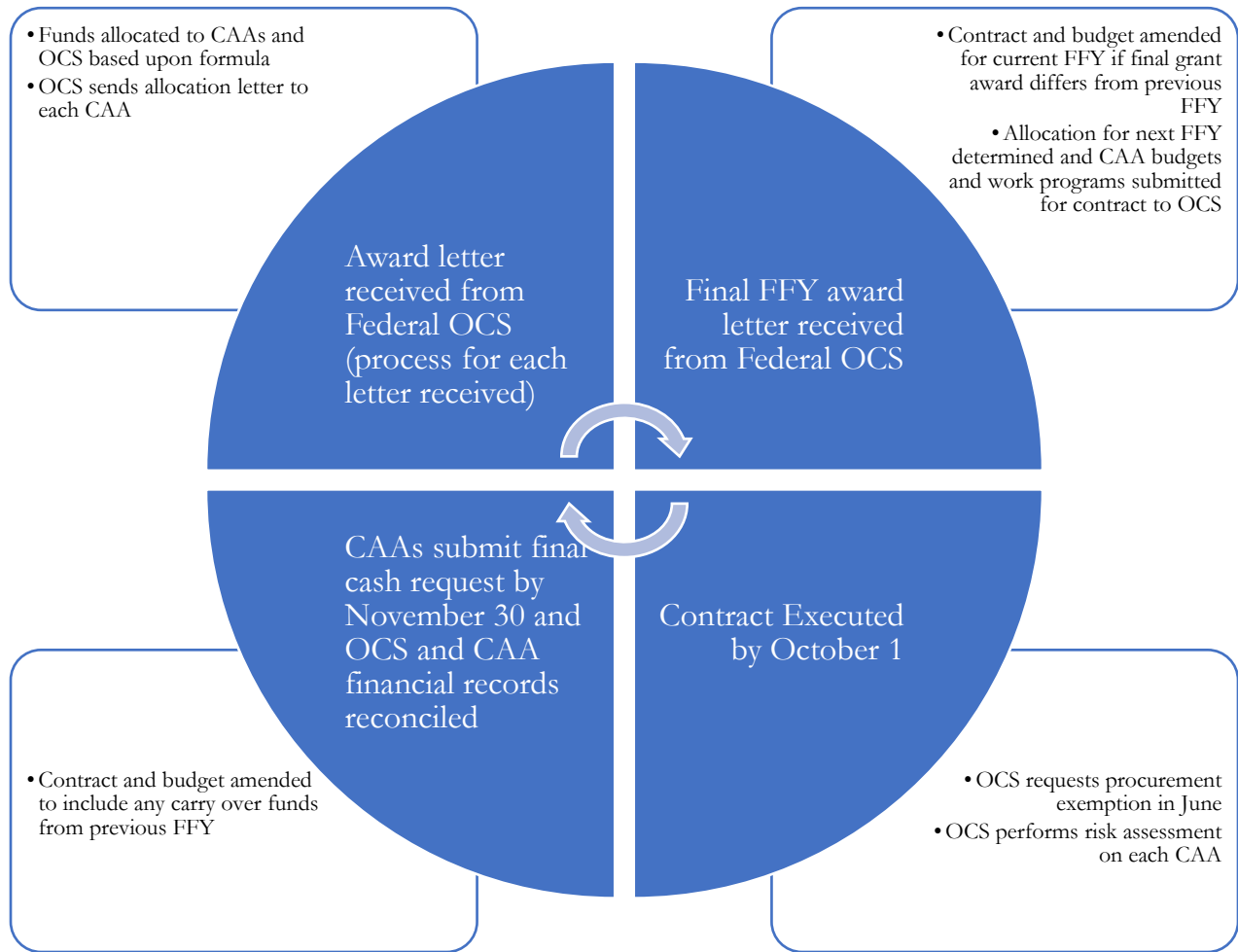


## **COMMUNITY SERVICE BLOCK GRANTS (CSBG) POLICIES AND PROCEDURES**

### **Appendix 6**

### **Allocation and Contracting Flowchart**

## Allocation and Budgeting Flowchart





# **COMMUNITY SERVICE BLOCK GRANTS (CSBG) POLICIES AND PROCEDURES**

## **Appendix 7**

### **Fiscal Report (Form 300)**

# Office of Community Services

Department of Labor and Industrial Relations

## FORM 300 - FISCAL REPORT

1. <b>RECIPIENT ORGANIZATION</b> Agency Name Agency Address	2. <b>FUNDING SOURCE</b> Federal, CFDA #93.569 Department of Health and Human Services	
3. <b>PROGRAM</b> COMMUNITY SERVICES BLOCK GRANT	4. <b>CONTRACT NUMBER</b>	5. <b>CONTRACT AMOUNT</b>
6. <b>CONTRACT PERIOD</b> From: To:	7. <b>PERIOD COVERED BY THIS REPORT (If Final, circle <i>FINAL</i>)</b> From: To:	

### 8. **COMPUTATION OF CASH REQUESTS:**

#### **For Reimbursement:**

#### **Amount**

1	Total Cash Disbursements to Date: (Cumulative Total from contract start date)	1.	_____
2	Total Cash Received to Date: (Cumulative Total from contract start date)	2.	_____
3	<b>Total Amount Due:</b> <span style="float: right;">Line 1 minus Line 2 = Line 3</span>	3.	_____
4	<b>Less:</b> Prior Cash Request not yet received	4.	_____
5	<b>Amount Requested For This Period:</b> <span style="float: right;">(Enter 0 if Line 3 is less than Line 4)</span>	5.	_____

### **CERTIFICATION:**

By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements, and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil, or administrative penalties for fraud, false statements, false claims, or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-3812).

_____	_____	_____
Signature	Print Name	Date Report Submitted

### **OFFICE OF COMMUNITY SERVICES USE ONLY**

#### **APPROVAL FOR PAYMENT**

I certify satisfactory receipt of goods/services listed in this invoice/form.

_____	Date: _____
Signature - Program Specialist	
_____	Date: _____
Signature - Fiscal Section	
_____	Date: _____
Signature - Executive Director	

## COMMUNITY SERVICE BLOCK GRANT

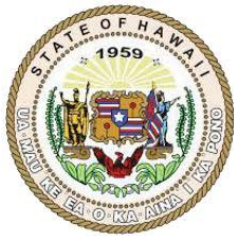
PERIOD COVERED: OCTOBER 1, 20xx TO SEPTEMBER 30, 20xx

### CONSOLIDATED BUDGET SUMMARY

CONSOLIDATED BUDGET SUMMARY																						
	FTE	FY 2025 TOTAL BUDGET	Oct-24	Nov-24	Dec-24	Quarter 1	Jan-25	Feb-25	Mar-25	Quarter 2	Apr-25	May-25	Jun-25	Quarter 3	Jul-25	Aug-25	Sep-25	Quarter 4	Expend YTD	Variance	% Budget	
I. ADMINISTRATIVE COSTS	\$	-	\$ -	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	0.00%	
1. PERSONNEL COSTS (SALARIES)	\$	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
2. OTHER PERSONNEL COSTS	\$	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
3. OTHER CURRENT EXPENSES	\$	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
II. PROGRAM SUPPORT COSTS	\$	-	\$ -	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	0.00%	
1. PERSONNEL COSTS (SALARIES)	\$	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
2. OTHER PERSONNEL COSTS	\$	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
3. OTHER CURRENT EXPENSES	\$	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	
III. TRAINING & TECHNICAL ASSISTANCE	\$	20,000.00	\$ -	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	20,000.00	0.00%
IV. DISCRETIONARY FUNDS	\$	13,000.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	0.00%
V. TOTAL	\$	33,000.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	20,000.00	0.00%

### DETAILED BUDGET SUMMARY

DETAILED BUDGET SUMMARY																					
CATEGORIES	FTE	FY 2025 TOTAL BUDGET	Oct-24	Nov-24	Dec-24	Quarter 1	Jan-25	Feb-25	Mar-25	Quarter 2	Apr-25	May-25	Jun-25	Quarter 3	Jul-25	Aug-25	Sep-25	Quarter 4	Expend YTD	Variance	Percent of Budget Expended
I. ADMINISTRATIVE COSTS		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	0.00%
1. PERSONNEL COSTS (SALARIES)		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	0.00%
List one position/personnel per line																					
2. OTHER PERSONNEL COSTS		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	0.00%
Payroll Taxes & Assessments																					
Social Security & Medicare																					
Unemployment Insurance																					
Workers' Compensation Insurance																					
Temporary Disability																					
Health Insurance																					
Retirement																					
Life Insurance																					
3. OTHER CURRENT EXPENSES		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	0.00%
Supplies																					
Postage, Freight & Delivery																					
Telecommunication																					
Publication & Printing																					
Mileage Reimbursement																					
Lease/Rental of Space																					
Lease/Rental of Equipment																					
Repair & Maintenance of Building/Equipment																					
Insurance																					
Independent Audit																					
Recruitment and Miscellaneous																					
Contractual Services - Security Services																					
Contractual Services - Payroll Services																					
Out of Town Travel & Registration (T&TA)																					
Membership, Subscription & Professional Activities																					
II. PROGRAM SUPPORT COSTS		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	0.00%
1. PERSONNEL COSTS (SALARIES)		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	0.00%
List one position/personnel per line																					
2. OTHER PERSONNEL COSTS		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	0.00%
Payroll Taxes & Assessments																					
Social Security & Medicare																					
Unemployment Insurance																					
Workers' Compensation Insurance																					
Temporary Disability																					
Health Insurance																					
Retirement																					
Life Insurance																					
3. OTHER CURRENT EXPENSES		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	0.00%
Supplies																					
Postage, Freight & Delivery																					
Telecommunication																					
Publication & Printing																					
Mileage Reimbursement																					
Lease/Rental of Space																					
Lease/Rental of Equipment																					
Utilities																					
Repair & Maintenance of Building/Equipment																					
Insurance																					
Space Rental																					
Independent Audit																					
Contractual Service																					
Contractual Services - Security Services																					
Contractual Services - Payroll Services																					
Recruitment & Miscellaneous																					
Program Activities																					
Membership, Subscription & Professional Activities																					
III. TRAINING & TECHNICAL ASSISTANCE		\$ 20,000.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 20,000.00	0.00%
Training		\$ 20,000.00																			
IV. DISCRETIONARY FUNDS		\$ 13,000.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,000.00	0.00%
Any expenses to assist the CAA accomplish CSBG program goals/for uses associated with Section 675(c)(1) of the CSBG Act		\$ 13,000.00																			
V. TOTAL		\$ 33,000.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 33,000.00	0.00%



## **COMMUNITY SERVICE BLOCK GRANTS (CSBG) POLICIES AND PROCEDURES**

### **Appendix 8**

### **CSBG Annual Report Template**





ADMINISTRATION FOR  
**CHILDREN & FAMILIES**  
Office of Community Services

OMB #0970-0492  
Expiration Date: 08/31/2027

# Community Services Block Grant Annual Report Version 2.1

PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13) STATEMENT OF PUBLIC BURDEN: The purpose of this collection is to meet the requirement of the Community Services Block Grant (CSBG) Act (42 U.S.C. § 9901, et seq) that all states that receive CSBG funding participate in a performance management system (Section 678E(a)(1)(A))) and submit a report to the Secretary on an annual basis (Section 678E(a)(2)). Public reporting burden for this collection of information is estimated to average 198 hours per grantee and 697 hours per sub-grantee, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. This is a mandatory collection of information per the Community Services Block Grant (CSBG) Act (42 U.S.C. § 9901, et seq) Section 678E(a)(1)(A)) and Section 678E(a)(2). An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information subject to the requirements of the Paperwork Reduction Act of 1995, unless it displays a currently valid OMB control number. If you have any comments on this collection of information, please contact CSBGStates@acf.hhs.gov.

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# State Administration – Module 1

Note: The reporting timeframes for all information in the state administration module is based on the **FEDERAL FISCAL YEAR**, which runs from October 1 of a given calendar year until September 30 of the following calendar year. When completing the annual report, respondents will first indicated the Federal Fiscal Year for which the state is submitting data. The On-Line Data Collection system (OLDC) will then pre-populate the *State Administration* module with information from the appropriate year (year 1 or year 2, as applicable) in the accepted CSBG State Plan. States will be able to update information in these sections, as necessary.

## **Community Services Block Grant (CSBG) Annual Report – State Administration Module**

### **Section A: CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact**

**A.1. Lead Agency:** Review and update (as applicable) the following information in relation to the lead agency designated to administer the CSBG in the state, as required by Section 676(a) of the CSBG Act.

**A.1a.** Lead Agency

**A.1b.** Cabinet or administrative department of this lead agency

**A.1c. Cabinet or Administrative Department Name:** Provide the name of the cabinet or administrative department of the CSBG authorized official

**A.1d.** Authorized official of the lead agency

Name \_\_\_\_\_ Title \_\_\_\_\_

**A.1e.** Street Address

**A.1f.** City

**A.1g.** State

**A.1h.** Zip code

**A.1i.** Work Telephone number and Extension (if applicable)

**A.1j.** Fax Number

**A.1k.** Email Address

**A.1l.** Lead Agency Website

**A.2.** Please check additional programs administered by the state CSBG Lead Agency during the reporting year (FFY).

- ☐ Weatherization Assistance Program (WAP)
- ☐ Low Income Home Energy Assistance Program (LIHEAP)
- ☐ Social Services Block Grant (SSBG)
- ☐ U.S. Department of Agriculture programs (Specify)
- ☐ U.S. Department of Housing and Urban Development (HUD) programs (Specify)
- ☐ U.S. Department of Labor (Specify)
- ☐ Other (Specify)

## Section B: Statewide Goals and Accomplishments

- B.1. Progress on State Plan Goals:** Describe progress in meeting the state's CSBG-specific goals for state administration of CSBG as described in the CSBG State Plan.

**State Plan Goals:** *[This will auto-populate from the CSBG State Plan and will not be revisable]*

Select the status that best fits the current status of your CSBG state goals as provided in your CSBG State Plan, and provide additional details.

- ☐ All Goals Accomplished – describe how all goals were accomplished, including outcomes:
- ☐ Goals Partially Accomplished – describe which goals were met and how, and provide an update on goals that have not yet been met:
- ☐ Not Accomplished – explain why goals were not met:

**Note:** This information is associated with State Accountability Measure 1Sa(i) and will be used in assessing overall progress in meeting state goals.

- B.2. CSBG Eligible Entity Overall Satisfaction Targets:** In the table below, provide the state's most recent target for CSBG eligible entity Overall Satisfaction during the performance period (FFY).

Prior Year Target	Most Recent American Customer Satisfaction Index Survey Result	Future Target
<i>This auto-populates from the CSBG State Plan 3.5</i>		

**Instructional Note:** Because the CSBG State Plan may cover two fiscal years, annual updates related to CSBG eligible entity satisfaction should be provided in this annual report. The state's target score will indicate improvement or maintenance of the state's Overall Satisfaction score from the most recent American Customer Survey Index (ACSI) survey of the state's CSBG eligible entities. States that did not receive ACSI scores (i.e. states with only a single CSBG eligible entity) should not complete B.2, but should provide narrative descriptions of other sources of customer feedback and the state's response to that feedback in question B.3. For more information on the ACSI and establishment of targets, see CSBG Information Memorandum #150 Use of the American Customer Satisfaction Index (ACSI) to improve Network Effectiveness.

- B.3. CSBG Eligible Entity Feedback and Involvement:** How has the state considered feedback from CSBG eligible entities, OCS, public hearings, and other sources, and/or customer satisfaction surveys such as the American Customer Satisfaction Index (ACSI)? What actions have been taken as a result of this feedback?
- B.4. State Management Accomplishment:** Describe what you consider to be the top management accomplishment achieved by your state CSBG office during the reporting year (FFY). Provide examples of how administrative or leadership actions led to improvements in efficiency, accountability, or quality of services and strategies.
- B.5. CSBG Eligible Entity Management Accomplishments:** Describe three notable management accomplishments achieved by CSBG eligible entities in your state during the reporting year (FFY). Describe how responsible, informed leadership, and effective, efficient processes led to high-quality, accessible, and well-managed services and strategies.
- B.6. Innovative Solutions Highlights:** Provide at least three examples of ways in which a CSBG eligible entity addressed a cause or condition of poverty in the community using an innovative or creative approach. Provide the agency name, local partners involved, outcomes, and specific information on how CSBG funds were used to support implementation.

## Section C: CSBG Eligible Entity Update

- C.1. Changes to Eligible Entities:** The table below includes a list of CSBG eligible entities receiving 90 percent funds within the state, as reported within the CSBG State Plan for this reporting period.

Did the list of eligible entities change during the reporting year (FFY)? If yes, briefly describe the changes. Please also update the Master List prior to the submission of your next CSBG State Plan.

If the eligible entity was designated or re-designated, de-designated or voluntarily relinquished, or merged with another eligible entity(ies), provide additional details in the next submission of the CSBG State Plan.

CSBG Eligible Entity	Geographical Area Served (by county)	Public or Nonprofit	Type of Entity	A change occurred during the reporting period (FFY)	Briefly describe changes
[Read-only]	[Read-only]	[Read-only]	[Read-only]	<input type="radio"/> Yes, please describe <input type="radio"/> No <input type="radio"/> Designated or re-designated <input type="radio"/> De-designated or voluntarily relinquished <input type="radio"/> Merged	

**Instructional Note: Limited Purpose Agency** refers to a CSBG eligible entity that was designated as a limited purpose agency under Title II of the Economic Opportunity Act of 1964 for the fiscal year 1981, that served the general purposes of a community action agency under Title II of the Economic Opportunity Act as a result of failure to comply with that Act; and has not lost its designation as a CSBG eligible entity under the CSBG Act.

**Instructional Note: 90 percent funds** are the funds a state provides to eligible entities to carry out the purposes of the CSBG Act, as described under Section 675C of the CSBG Act. A state must provide “no less than 90 percent” of their CSBG allocation, under Section 675B, to the eligible entities.

- C.2.** Total number of CSBG Eligible Entities:

## Section D: Organizational Standards for CSBG Eligible Entities

**Note:** Reference CSBG Information Memorandum #138 State Establishment of Organizational Standards for CSBG Eligible Entities

- D.1. Assessment of Organizational Standards:** In the CSBG State Plan, the state indicated whether it would implement the Center of Excellence (COE) organizational standards, a modified version, or an alternative set of standards for its oversight of CSBG:

*The state's original response is provided below:*

- ☐ COE CSBG Organizational Standards
- ☐ Modified version of COE CSBG Organizational Standards
- ☐ Alternative set of organizational standards

**Note:** A change to the type of Organizational Standards chosen in the original submission of the CSBG State Plan during the reporting period would require an updated CSBG State Plan.

- D.1a. Organizational Standards Assessment:** Review and update, as applicable, how the state assessed CSBG eligible entities against organizational standards, as described in IM 138.

- ☐ Peer-to-peer review (with validation by the state or state-authorized third party)
- ☐ Self-assessment (with validation by the state or state-authorized third party)
- ☐ Self-assessment/peer review with state risk analysis
- ☐ State-authorized third party validation
- ☐ Regular, on-site CSBG monitoring
- ☐ Other

- D.1b.** Describe the assessment process as implemented by the state. Please describe any changes in the assessment process that occurred since the time of the CSBG State Plan submission. Please note that with the exception of regular on-site CSBG monitoring, all assessment options above may include either on-site or desk review (or a combination). The specific state process should be described in this narrative.



**D.2. Organizational Standards Performance:** In the table below, please provide the percentage of CSBG eligible entities that met all state-adopted organizational standards in the reporting period (FFY). The target set in the CSBG State Plan is provided in the left-hand column. For more information on the CSBG Organizational Standards, see CSBG Information Memorandum #138.

**Note:** This information is associated with State Accountability Measures 6Sa.

**Total Number of Entities Assessed**

**Note:** The states should assess all eligible entities unless the state exempted the eligible entities per guidance in IM #138, as originally reported in the CSBG State Plan.

<b>Total Number of Entities within the State</b>	<b>Number of Entities Exempted</b>	<b>Number of Assessable Entities</b>	<b>Number of Entities Assessed</b>
[Auto-populated C.2]	[Insert a number between 0 – 99]	[Auto-calculated]	[Insert a number between 0 – 99]

**Target vs. Actual Performance on the Organizational Standards**

<b>State CSBG Plan Target</b>	<b>Number that Met All (100%) of State Standards</b>
Auto-populated target from CSBG State Plan	[Insert a number between 0 – 99]

**Progress Indicators**

*Indicate the number of entities that met the following percentages of Organizational Standards.*

**Note:** While the state targets the percent of CSBG Eligible Entities to meet 100 percent of the Organizational Standards, targets are not set in the State Plan for 90, 80, 70, and 60 percent progress indicators.

<b>Number of Entities Assessed</b>	<b>Number that Met All (100%) of State Standards</b>	<b>Actual Percentage</b>
[Auto-populated from table above]	[Insert a number between 0 – 99]	[Auto-calculated]
<b>Number of Entities Assessed</b>	<b>Number that Met between 90% and 99% of state standards</b>	<b>Actual Percentage</b>
[Auto-populated from table above]	[Insert a number between 0 – 99]	[Auto-calculated]
<b>Number of Entities Assessed</b>	<b>Number that Met between 80% and 89% of state standards</b>	<b>Actual Percentage</b>
[Auto-populated from table above]	[Insert a number between 0 – 99]	[Auto-calculated]

Number of Entities Assessed	Number that Met between 70% and 79% of state standards	Actual Percentage
[Auto-populated from table above]	[Insert a number between 0 – 99]	[Auto-calculated]
Number of Entities Assessed	Number that Met less than 69% of state standards	Actual Percentage
[Auto-populated from table above]	[Insert a number between 0 – 99]	[Auto-calculated]

**D.2a.** In the space below, identify the challenges and factors contributing to the difference between the target and actual results provided in the top row of Table D.2 (above).

**D.2b. Percentage Meeting Organizational Standards by Category:** In the table below, provide the number of eligible entities that met each category of the Organizational Standards. The percentage that meet all standards in each category will be automatically calculated and totaled in the bottom row.

Category	Number of Entities Assessed	Number that Met All Standards in Category	Actual Percentage
<b>1. Consumer Input &amp; Involvement</b>	[Auto-populated from Module 1, D.2.]	[Insert a number between 0 – 99]	[Auto-calculated]
<b>2. Community Engagement</b>	[Auto-populated from Module 1, D.2.]	[Insert a number between 0 – 99]	[Auto-calculated]
<b>3. Community Assessment</b>	[Auto-populated from Module 1, D.2.]	[Insert a number between 0 – 99]	[Auto-calculated]
<b>4. Organizational Leadership</b>	[Auto-populated from Module 1, D.2.]	[Insert a number between 0 – 99]	[Auto-calculated]
<b>5. Board Governance</b>	[Auto-populated from Module 1, D.2.]	[Insert a number between 0 – 99]	[Auto-calculated]
<b>6. Strategic Planning</b>	[Auto-populated from Module 1, D.2.]	[Insert a number between 0 – 99]	[Auto-calculated]
<b>7. Human Resource Management</b>	[Auto-populated from Module 1, D.2.]	[Insert a number between 0 – 99]	[Auto-calculated]
<b>8. Financial Operations &amp; Oversight</b>	[Auto-populated from Module 1, D.2.]	[Insert a number between 0 – 99]	[Auto-calculated]
<b>9. Data and Analysis</b>	[Auto-populated from Module 1, D.2.]	[Insert a number between 0 – 99]	[Auto-calculated]

**D.3. Technical Assistance Plans for Unmet Organizational Standards:** As outlined in IM 138, states are expected to develop a Technical Assistance Plan (TAP) where needed to assist an eligible entity to meet the standard in a reasonable timeframe.

Did the state develop any TAPs specifically for eligible entities with unmet organizational standards to assist in meeting the standard(s) in a reasonable timeframe? ☐ Yes ☐ No

If yes, how many eligible entities are on a TAP, specifically for unmet organizational standards? *Provide a numerical amount between 0 – 99.*

**D.3a.** If the state identified CSBG eligible entities with unmet organizational standards for which it was determined that TAPS would not be appropriate, please provide a narrative explanation below. ☐ Yes ☐ No

**Note:** D.3 is associated with State Accountability Measure 6Sb.

## Section E: State Use of Funds

**Note:** The purpose of this section is to report on the funds received and spent during the Federal Fiscal Year (FFY), October 1 – September 30. Please review the final award letter received during the Federal Fiscal Year for the reporting period and the Federal Financial Report (FFR) submitted using standard form 425 (SF-425) for this reporting period. Please ensure that any allocations, obligations, and carry-over amounts reported below are for funds awarded in this FFY and are reconciled with the amounts reported in the FFR.

An electronic version of the [FFR](#) is available for reference.

### CSBG Eligible Entity Allocation (90 Percent Funds) [Section 675C(a) of the CSBG Act]

**E.1. State Distribution Formula:** Did the state institute any changes in the distribution formula for the CSBG eligible entities during the reporting period covered by this report? ☐ Yes ☐ No

**E.1a.** If yes, please describe any specific changes and describe how the state complied with the assurances provided in Question 14.8 of the CSBG State Plan as required under Section 676(b)(8) of the State CSBG Act.

**E.2. Planned vs. Actual Allocation and Expenditures:** Using the table below, specify the actual allocation of 90 percent of CSBG funds to CSBG eligible entities, as described under Section 675C(a) of the CSBG Act. This table must be based on actual dollars allocated, obligated to, and expended (liquidated) for each CSBG eligible entity during the FFY. For each CSBG eligible entity receiving CSBG funds, provide the Funding Amount allocated to the CSBG eligible entity during the FFY.

*Note: The Amount Allocated and the Amount Obligated are going to be an exact match the majority of the time. Amounts expended (liquidated) should reflect actual payments made to eligible entities.*

CSBG Eligible Entity	Planned Allocations	Actual Amount of Allocations (The Amount Allotted to each entity based on State Formula from current FFY funding)	Actual Amount of Obligations (The actual amount made available through sub-awards to each entity during the FFY from current FFY funding)	Actual Expenditures (The actual amount liquidated to each entity during the FFY from current FFY funding)	Carryover Expenditures (The actual amount liquidated to each entity during the FFY from prior FFY funding)
Auto-populated from the CSBG State Plan, Table 5.1, Column 1 and cannot be revised.	Auto-populated from the CSBG State Plan Table 7.2 and cannot be revised.	[Numeric response, specify \$ amount]	[Numeric response, specify \$ amount]	[Numeric response, specify \$ amount]	[Numeric response, specify \$ amount]

Total	Total will be auto-calculated	Total will be auto-calculated	Total will be auto-calculated	Total will be auto-calculated	Total will be auto-calculated
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**E.3. Actual Distribution Timeframe:** Did the state make funds available to CSBG eligible entities no later than 30 days after OCS distributed the federal award. ☐ Yes ☐ No

**E.3a.** If no, did the state implement procedures to ensure funds were made available to CSBG eligible entities consistently and without interruption? ☐ Yes ☐ No

**E.3b.** If the state was **not** able to make CSBG funds available within 30 calendar days after OCS distributed the federal award and was not able to ensure that funds were made available consistently and without interruption, provide an explanation of the circumstances below along with a description of planned corrective actions.

**Note:** Item E.3 is associated with State Accountability Measure 2Sa.

**Administrative Funds** [Section 675C(b)(2) of the CSBG Act]

**E.4. State Administrative Funds:** What amount of state CSBG funds did the state obligate for administrative activities during the FFY? The amount must be based on actual dollars allocated during the FFY. If you provided a percentage in Question 7.6 in the CSBG State Plan, please convert to dollars.

CSBG State Plan Target	Actual Amount of Allocation <i>(The amount allotted for state administrative activities)</i>	Actual Amount of Obligation <i>(The actual amount formally committed for procurement or direct expenditure activities during the FFY through state)</i>	Actual Amount of Expenditures <i>(The actual amount liquidated through procurement or direct expenditure activities during the FFY through state)</i>	Actual Carryover Expenditures <i>(The actual amount liquidated through procurement or direct expenditure activities from prior year FFY through state)</i>
[Auto-populated target from the CSBG State Plan Question 7.6]	[Numeric Response, specify \$ amount]	[Numeric response, specify \$ amount]	[Numeric response, specify \$ amount]	[Numeric response, specify \$ amount]

**E.5. State Staff Positions Funded:** How many state staff positions were funded in whole or in part with CSBG funds in the reporting period (FFY)?

CSBG State Plan	Actual Number
[Auto-populated target from the CSBG State Plan Question 7.7]	[Insert a Number between 0 – 99]

**E.6. State FTEs:** How many state Full Time Equivalents (FTEs) were funded with CSBG funds in the reporting period (FFY)?

CSBG State Plan	Actual Number
[Auto-populated target from the CSBG State Plan Question 7.8]	[Insert a Number between 0 – 99]

**Remainder/Discretionary Funds** [Section 675C(b) of the CSBG Act]

**E.7.** Describe how the state used remainder/discretionary funds in the table below.

**Instructional Note:** This table in the administrative report must be based on actual dollars obligated to each budget category using funds awarded in this federal fiscal year. States that do not have remainder/discretionary funds will not complete this item. If a funded activity fits under more than one category in the table, allocate the funds among the categories.

For example, if the state provides funds under a contract with the state Community Action Association to provide T/TA to CSBG eligible entities and to create a statewide data system, the funds for that contract should be allocated appropriately between Row a and Row c. If an allocation is not possible, the state may allocate the funds to the main category with which the activity is associated.

**Note:** This information is associated with State Accountability Measures 3Sa.

<b>Remainder/Discretionary Fund Uses</b> (See 675C(b)(1) of the CSBG Act)	<b>Planned Allocation</b> <i>(Pre-populated from CSBG State Plan)</i>	<b>Actual Allocation</b> <i>(The Actual Amount Allotted)</i>	<b>Actual Obligation</b> <i>(The Actual Amount formally committed)</i>	<b>Actual Expenditure</b> <i>(The actual amount liquidated)</i>	<b>Actual Carryover Expenditure</b> <i>(The actual amount liquidated from prior FFY funding)</i>	<b>Brief Description of services/activities</b> <i>(Briefly describe the actual services and activities)</i>
<b>E.7a.</b> Training/technical assistance to eligible entities	[Pre-populated from the state plan]	[Enter a numeric response]	[Enter a numeric response]	[Enter a numeric response]	[Enter a numeric response]	[Provide a Narrative]
<b>E.7b.</b> Coordination of state-operated programs and/or local programs	[Pre-populated from the state plan]	[Enter a numeric response]	[Enter a numeric response]	[Enter a numeric response]	[Enter a numeric response]	[Provide a Narrative]
<b>E.7c.</b> Statewide coordination and communication among eligible entities	[Pre-populated from the state plan]	[Enter a numeric response]	[Enter a numeric response]	[Enter a numeric response]	[Enter a numeric response]	[Provide a Narrative]
<b>E.7d.</b> Analysis of distribution of CSBG funds to determine if targeting greatest need	[Pre-populated from the state plan]	[Enter a numeric response]	[Enter a numeric response]	[Enter a numeric response]	[Enter a numeric response]	[Provide a Narrative]
<b>E.7e.</b> Asset-building programs	[Pre-populated from the state plan]	[Enter a numeric response]	[Enter a numeric response]	[Enter a numeric response]	[Enter a numeric response]	[Provide a Narrative]

<b>Remainder/Discretionary Fund Uses</b> (See 675C(b)(1) of the CSBG Act)	<b>Planned Allocation</b> (Pre-populated from CSBG State Plan)	<b>Actual Allocation</b> (The Actual Amount Allotted)	<b>Actual Obligation</b> (The Actual Amount formally committed)	<b>Actual Expenditure</b> (The actual amount liquidated)	<b>Actual Carryover Expenditure</b> (The actual amount liquidated from prior FFY funding)	<b>Brief Description of services/activities</b> (Briefly describe the actual services and activities)
<b>E.7f.</b> Innovative programs/activities by eligible entities or other neighborhood groups	[Pre-populated from the state plan]	[Enter a numeric response]	[Enter a numeric response]	[Enter a numeric response]	[Enter a numeric response]	[Provide a Narrative]
<b>E.7g.</b> State charity tax credits	[Pre-populated from the state plan]	[Enter a numeric response]	[Enter a numeric response]	[Enter a numeric response]	[Enter a numeric response]	[Provide a Narrative]
<b>E.7h.</b> Other activities, specify	[Pre-populated from the state plan]	[Enter a numeric response]	[Enter a numeric response]	[Enter a numeric response]	[Enter a numeric response]	Narrative 2500 characters
<b>Totals</b>	<b>Auto-calculated</b>	<b>Auto-calculated</b>	<b>Auto-calculated</b>	<b>Auto-calculated</b>	<b>Auto-calculated</b>	

**E.8.** What types of organizations, if any, did the state work with (by grant or contract using remainder/discretionary funds) to carry out some or all of the activities in Table E.7 (above). *Check all that apply and provide a narrative where applicable.*

- ☐ CSBG Eligible Entities (if checked, include the expected number of CSBG eligible entities to receive funds)
- ☐ Other community-based organizations
- ☐ State Community Action Association
- ☐ Regional CSBG technical assistance provider(s)
- ☐ National technical assistance provider(s)
- ☐ Individual consultant(s)
- ☐ Tribes and Tribal Organizations
- ☐ Other
- ☐ None (the state will carry out activities directly)

**E.9 Total Obligations and Expenditures:** Total CSBG funds obligated and expended from CSBG funds awarded for the FFY. *Review and confirm from the chart below).*

<b>Category</b>	<b>Actual Obligations</b>	<b>Actual Expenditures</b>
<b>E.9a.</b> CSBG eligible entities Funds (from State CSBG 90% formula funds)	Auto-populated from Table E.2 (total actual obligations in contracts and sub-awards)	Auto-populated from Table E.2 (total actual liquidations)

<b>E.9b. State Administrative Costs</b>	Auto-populated from Table E.4 (total actual obligations of administrative funds)	Auto-populated from Table E.4 (total actual liquidations)
<b>E.9c. Remainder/Discretionary Funds</b>	Auto-populated from Table E.7 (total actual obligations of state remainder/discretionary funds)	Auto-populated from Table E.7 (total actual liquidations)
<b>E.9d. Total</b>	Total will be auto-calculated from three rows above	Total will be auto-calculated from three rows above

**E.10. Total Award Amount and Unobligated Balance:** In the table below, provide the unobligated balance for the federal fiscal year. The amount provided should be identical to the unobligated balance of federal funds as reported in LINE H of the FFR for this reporting year. This is the amount that was unobligated and will carry forward to the next federal fiscal year.

Note: The total award amount should be identical to the amount reported in LINE D of the FFR. If this amount does not reconcile, please review.

<b>Category</b>	<b>Totals</b>
<b>E.10a. Total Obligations</b>	Auto-populated from Table E.9 (total actual obligations)
<b>E.10b. Total Expenditures</b>	Auto-populated from Table E.9 (total actual expenditures)
<b>E.10c. Unobligated Balance from the FFY</b>	[Numeric response, specify \$ amount]
<b>E.10d. Total Award Amount</b>	Total will be auto-calculated from E.10b and E.10c above



## Section F: State Training and Technical Assistance

- F.1. Training and Technical Assistance Plan:** Describe how the state delivered CSBG-funded training and technical assistance to CSBG eligible entities by completing the table below. Add a row for each activity: indicate the timeframe; whether it was training, technical assistance, or both; and the topic.

*(CSBG funding used for this activity is referenced under Item E.7a, Use of Remainder/Discretionary Funds. State should also describe any training and technical assistance activities performed directly by state staff, regardless of whether these activities are funded with remainder/discretionary funds.)*

**Note:** F.1 is associated with State Accountability Measures 3Sc.

Training, Technical Assistance, or Both	Topic	Start Date	End Date	Brief Description
<b>Auto-populated from Table 8.1 of the CSBG State Plan</b> <ul style="list-style-type: none"> <li>• Training</li> <li>• Technical Assistance</li> <li>• Both</li> </ul>	<b>Auto-populated from Table 8.1 of the CSBG State Plan</b> <ul style="list-style-type: none"> <li>• Fiscal</li> <li>• Governance/Tripartite Boards</li> <li>• Organizational Standards – General</li> <li>• Organizational Standards – for Eligible Entities with unmet standards on TAPs or QIPs</li> <li>• Correcting Significant Deficiencies Among CSBG Eligible Entities</li> <li>• Reporting</li> <li>• ROMA</li> <li>• Community Assessment</li> <li>• Strategic Planning</li> <li>• Monitoring</li> <li>• Communication</li> <li>• Technology</li> <li>• Other</li> </ul>	[Enter Date]	[Enter Date]	<b>[Narrative, 2500 characters]</b>  <i>Provide additional brief explanation of the technical assistance activities implemented. If “Other” was selected in Column 3, describe in this column.</i>

*Note: this table will allow you to add additional rows as needed.*

- F.2. Training and Technical Assistance Organizations:** Indicate the types of organizations through which the state provided training and/or technical assistance as described in Item F.1, and briefly describe their involvement? *(Check all that apply and provide a narrative where applicable.)*

- ☐ CSBG Eligible Entities (if checked, provide the expected number of CSBG eligible entities to receive funds) **[Narrative, 3 characters]**
- ☐ Other community-based organizations
- ☐ State Community Action Association

- ☐ Regional CSBG Technical Assistance Provider(s)
- ☐ National Technical Assistance Provider(s)
- ☐ Individual consultant(s)
- ☐ Tribes and Tribal Organizations
- ☐ Other [Provide the types of organizations]

## Section G: State Linkages and Communication

**Note:** This section describes activities that the state supported with CSBG remainder/discretionary funds, described under Section 675C(b)(1) of the CSBG Act.

**Note:** This section is associated with State Accountability Measure 7Sa.

**G.1. State Linkages and Coordination at the State Level:** Please review and confirm the areas for linkages and coordination that were outlined in the CSBG State Plan.

- ☐ State Low Income Home Energy Assistance Program (LIHEAP) office
- ☐ State Weatherization office
- ☐ State Temporary Assistance for Needy Families (TANF) office
- ☐ State Head Start office
- ☐ State public health office
- ☐ State education department
- ☐ State Workforce Innovation and Opportunity Act (WIOA) agency
- ☐ State budget office
- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ State child welfare office
- ☐ State housing office
- ☐ Other

**G.1a.** Describe the linkages and coordination at the state-level that the state created or maintained to ensure increased access to CSBG services by communities and people with low-incomes that avoid duplication of services (as required by the assurance under Section 676(b)(5) and identified in the CSBG State Plan. Describe or attach additional information as needed and provide a narrative describing activities including an explanation of any changes from the original CSBG State Plan.

**G.2. State Linkages and Coordination at the Local Level:** Review and update the actual activities for linkages and coordination at the local level that the state created or maintained during the FFY, including an explanation of any changes from the original CSBG State Plan.

Include linkages with governmental and other social services, especially antipoverty programs, to assure the effective delivery of and coordination of CSBG services to people with low-incomes and communities and avoid duplication of services (as required by assurances under Section 676(b)(5) – (6)).

**G.3. CSBG Eligible Entity Linkages and Coordination**

**G.3a. State Assurance of CSBG Eligible Entity Linkages to Fill Service Gaps:** Review and update how the state assured that the CSBG Eligible Entities coordinated and established linkages to assure the effective delivery and coordination of CSBG services to people with low-incomes and communities and avoid

duplication of services (as required by the assurance under Section 676(b)(5)). Attach additional information as needed.

**G.3b. State Assurance of CSBG Eligible Entity Linkages to Fill Service Gaps:** Review and update how the CSBG eligible entities developed linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations, according to the assurance under Section 676(b)(3)(B) of the CSBG Act.

**G.4. Workforce Innovation and Opportunity Act (WIOA) Employment and Training Combined Plan Activities (if applicable):** If the state included CSBG employment and training activities as part of a WIOA Combined State Plan, as allowed under the Workforce Innovation and Opportunity Act, provide a brief narrative describing the status of WIOA coordination activities, including web links, if available, to any publicly accessible combined plans and reports.

**G.5. Coordination among CSBG Eligible Entities and the State Community Action Association:** Review and update state activities that took place to support coordination among the CSBG eligible entities and the State Community Action Association.

**G.6. Feedback to CSBG Eligible Entities and State Community Action Association:** Review and update how the state provided feedback to local entities and the State Community Action Association regarding its performance on State Accountability Measures.

**Note:** This information is associated with State Accountability Measure 5S(iii). The measure indicates feedback should be provided within 60 calendar days of the state receiving feedback from OCS.

## Section H: Monitoring, Corrective Action, and Fiscal Controls

**H.1. Monitoring Schedule:** Update the monitoring schedule below. Briefly describe the actual monitoring visits conducted during the FFY, including: full on-site reviews; on-site reviews of newly designated entities; follow-up reviews – including return visits to entities that failed to meet state goals, standards, and requirements; and other reviews as appropriate.

If a monitoring visit was planned during the year but not implemented, provide a brief explanation in the far right column of the table below.

**Note:** This information is associated with State Accountability Measure 4Sa(i).

CSBG Eligible Entity	Monitoring Type	Review Type	Monitoring Start Date	Monitoring End Date	Brief Description of Purpose
[Auto-populated from CSBG State Plan 10.1]	<b>Dropdown Options:</b> <ul style="list-style-type: none"> <li>• Full onsite</li> <li>• Newly Designated</li> <li>• Follow-up</li> <li>• Other</li> <li>• No Review</li> </ul>	<b>Dropdown Options:</b> <ul style="list-style-type: none"> <li>• Onsite Review</li> <li>• Desk Review</li> </ul>	[Enter Date]	[Enter End Date]	[Narrative, 500 characters]  <b>Note:</b> If the visit was not a part of the original monitoring plan, provide a brief explanation for the purpose of the visit (e.g. a follow-up regarding a special issue). This section should not be used to outline findings.

*Note: this table will allow you to add additional rows as needed, but you will not be able to delete rows from your CSBG State Plan submission.*

**H.2. Monitoring Policies:** Were any modifications made to the state’s monitoring policies and procedures during the reporting period (FFY)? ☐ Yes ☐ No

If changes were made to state monitoring policies and procedures, attach and/or provide a hyperlink to the modified documents. **[Attach a document or provide a link]**

**H.3. Initial Monitoring Reports:** Were all state monitoring reports conducted in a manner consistent with state monitoring policies and procedures and disseminated to CSBG eligible entities within 60 calendar days? ☐ Yes ☐ No

**Note:** This item is associated with State Accountability Measure 4Sa(ii).

### Corrective Action, Termination, and Reduction of Funding and Assurance Requirements (Section 678C of the CSBG Act)

**H.4. Technical Assistance Plans (TAPs)**

**H.4a. Technical Assistance Plans (TAPs):** Are there any CSBG eligible entities within the state that are on a TAP due to *issues of noncompliance* identified during a monitoring review during the FFY? ☐ Yes ☐ No

**H.4b. Creating Technical Assistance Plans (TAPs):** Did the state work with all monitored CSBG eligible entities with *issues of noncompliance* to create a TAPs, as necessary? ☐ Yes ☐ No

**H.4c. Reporting TAPs:** Did the state report all TAPs to the Office of Community Services within 30 calendar days of creation? ☐ Yes ☐ No

#### **H.5. Quality Improvement Plans (QIPs)**

**H.5a. Quality Improvement Plans (QIPs):** Are there any CSBG eligible entities within the state that are on a QIP due to unresolved *issues of noncompliance* identified in the TAP? ☐ Yes ☐ No

**H.5b. Creating Quality Improvement Plans (QIPs):** Did all CSBG eligible entities on Quality Improvement Plans resolve *issues of noncompliance* within the schedule agreed upon by the state and eligible entity? ☐ Yes ☐ No

**H.5c. Reporting QIPs:** Did the state report all CSBG eligible entities with serious deficiencies from a monitoring review to the Office of Community Services within 30 calendar days of the state approving a QIP? ☐ Yes ☐ No

#### **Fiscal Controls and Audits**

**H.6. Single Audit Review:** Pass through entities are required by 2 CFR 200.331(f) to verify that every sub-recipient is audited as required by 2 CFR 200.501. In the table below, provide the information for any CSBG eligible entity Single Audit in the Federal Audit Clearinghouse (FAC) submitted during the Federal Fiscal Year (FFY).

2 CFR 200.521 requires pass-through entities to provide a management decision for findings related to federal awards the pass-through makes to the sub-recipients. If applicable, provide the information regarding these decisions.

Note: Per 2 CFR 200.501, each eligible entity that receives at least \$750,000 in federal funds, is required to submit a Single Audit within the FAC annually. A State Management Decision is required within 6 months (2 CFR 200.521(d)), if there is a CSBG finding within the Single Audit.

Eligible Entity	Eligible Entity Required to Report Single Audit in FAC	Eligible Entity Submitted a Single Audit in FAC?	Date Audit was Accepted by Federal Audit Clearinghouse	If Entity did not submit as required, has the state taken steps to ensure compliance?	State Management Decision Required? (As Applicable)	Date Management Decision Issued (As applicable)
Auto-populated from Eligible Entity Master List	[Yes or No]	[Yes, No, or Late]	[Enter Date]	[Yes or No]	[Yes or No]	[Enter Date]

*Note: Rows may be added for each additional Single Audit accepted by the Federal Audit Clearinghouse during the fiscal year.*

**H.7. Single Audit Management Decisions:** Briefly describe any management decisions issued according to state procedures of CSBG eligible entity single audit. Provide the audit finding reference number from the Federal Audit Clearinghouse and describe any required actions and timelines for correction.

**Note:** This information is associated with State Accountability Measure 4Sd.

## Section I: Results Oriented Management and Accountability (ROMA) System

- I.1. Performance Management System Participation:** Confirm the performance measurement system that the state and CSBG eligible entities use, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act.

- ☐ The Results Oriented Management and Accountability (ROMA) System
- ☐ Another performance management system that meets the requirements of Section 678E(b) of the CSBG Act
- ☐ An alternative system for measuring performance and results

**I.1a.** If ROMA was selected in I.1, provide an update on any changes in procedures or to data collection systems that were initiated or completed in the reporting period.

**I.1b.** If ROMA was not selected in Item I.1, describe the system the state used for performance measurement. Provide an update on any changes in procedures or to data collection systems that were initiated or completed in the reporting period.

- I.2. State ROMA Support:** How did the state support the CSBG eligible entities in using the ROMA system or alternative performance measurement system in promoting continuous improvement? For example, describe any data systems improvements, support for community needs assessment, support for strategic planning, data analysis, etc.

- I.3. State Review of CSBG Eligible Entity Data:** Describe the procedures and activities the state used to review the ROMA data (i.e. all data from elements of the ROMA cycle) from CSBG eligible entities for completion and accuracy (e.g. methodology used for validating the data submitted annually by the local agencies).

- I.4. State Feedback on Data Collection, Analysis, and Reporting:** State Accountability Measure 5S(ii) requires states to submit written feedback to each CSBG eligible entity regarding the entity's performance in meeting ROMA goals, as measured through National Performance Indicator (NPI) data, within 60 calendar days of submitting the state's Annual Report. Has the state provided each CSBG eligible entity with timely feedback (within at least 60 days of the submission) regarding the entity's performance in meeting ROMA goals as measured through national performance data?

☐ Yes    ☐ No

If yes, please describe.

**Note:** This information is associated with State Accountability Measure 5S(ii).

- I.5. State and CSBG Eligible Entity Continuous Improvement:** Provide 2 – 3 examples of changes made by CSBG eligible entities to improve service delivery and enhance impact



for individuals, families, and communities with low-incomes based on their in-depth analysis of performance data.

# **Eligible Entity Expenditures, Capacity, and Resources – Module 2**

## Instructional Notes

### Module 2, Section A: CSBG Expenditures by CSBG Eligible Entity

**Section A: CSBG Expenditures by CSBG Eligible Entity Data Entry Form** meets the Congressional requirement for an explanation of the *total amount of CSBG funding expended during the reporting period (identified below)* based on categories referenced in the CSBG Act.

CSBG funding expended during the reporting period should be identified in the domain that best reflects the services delivered and strategies implemented, as well as the administrative costs associated with the domains.

### Module 2, Section B: CSBG Eligible Entity Capacity Building

**Section B: CSBG Eligible Entity Capacity Building Data Entry Form** provides detail on agency capacity building funded by CSBG and other funding sources.

### Module 2, Section C: Allocated Resources per CSBG Eligible Entity

**Section C: Allocated Resources per CSBG Eligible Entity data entry form** provides data on resources allocated to, administered through, and generated by the CSBG Eligible Entity. This report provides valuable information on how CSBG leverages funds from multiple federal, state, local, and private sources as required in the CSBG Act.

## Module 2, Section A: CSBG Expenditures by CSBG Eligible Entity

Name of CSBG Eligible Entity Reporting:	
State:	UEI:
<b>A.1. CSBG Eligible Entity Reporting Period</b>	"X"
A.1a. July 1 - June 30	
A.1b. October 1 - September 30	
A.1c. January 1 - December 31	

<b>A.2. CSBG Expenditures Domains</b>	<b>CSBG Funds</b>
A.2a. Employment	
A.2b. Education and Cognitive Development	
A.2c. Income, Infrastructure, and Asset Building	
A.2d. Housing	
A.2e. Health and Social/Behavioral Development <i>(includes nutrition)</i>	
A.2f. Civic Engagement and Community Involvement	
A.2g. Services Supporting Multiple Domains	
A.2h. Linkages <i>(e.g. partnerships that support multiple domains)</i>	
A.2i. Agency Capacity Building <i>(detailed below in Table A.4)</i>	
A.2j. Other <i>(e.g. emergency management/disaster relief)</i>	
<b>A.2k. Total CSBG Expenditures (auto calculated)</b>	<b>\$0</b>

A.3. Of the CSBG funds reported above, report the total amount used for Administration. <a href="#">For more information on what qualifies as Administration, refer to IM37.</a>	
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<b>A.4. Details on Agency Capacity Building Activities Funded by CSBG:</b>
<p>1. Please identify which activities were funded by CSBG under Agency Capacity in Table A.2. Please check all that apply.</p> <p> <input type="checkbox"/> Community Needs Assessment           <input type="checkbox"/> Data Management &amp; Reporting           <input type="checkbox"/> Other*         </p> <p> <input type="checkbox"/> Strategic Planning           <input type="checkbox"/> Training &amp; Technical Assistance         </p> <p><i>*Below please specify Other Activities funded by CSBG under Agency Capacity:</i></p>

## Module 2, Section B: CSBG Eligible Entity Capacity Building

<b>Name of CSBG Eligible Entity Reporting:</b>	
<b>State:</b>	<b>UEI:</b>
<b>B.1. CSBG Eligible Entity Reporting Period</b>	<b>"X"</b>
<b>B.1a. July 1 - June 30</b>	<i>auto-populated from Module 2, Section A</i>
<b>B.1b. October 1 - September 30</b>	
<b>B.1c. January 1 - December 31</b>	

<b>B.2. Hours of Agency Capacity Building (e.g. training, planning, assessment):</b>	<b>Hours</b>
B.2a. Hours of Board Members in capacity building activities	
B.2b. Hours of Agency Staff in capacity building activities	

<b>B.3. Volunteer Hours of Agency Capacity Building (e.g. program support, service delivery, fundraising):</b>	<b>Hours</b>
B.3a. Total number of volunteer hours donated to the agency	
B.3a.1. Of the above, the total number of volunteer hours donated by individuals with low-incomes	

<b>B.4. The number of staff who hold certifications that increase agency capacity to achieve family and community outcomes, as measured by one or more of the following:</b>	<b>Number</b>
B.4a. Number of Nationally Certified ROMA Trainers	
B.4b. Number of Nationally Certified ROMA Implementers	
B.4c. Number of Certified Community Action Professionals (CCAP)	
B.4d. Number of Staff with a child development certification	
B.4e. Number of Staff with a family development certification	
B.4f. Number of Pathways Reviewers	
B.4g. Number of Staff with Home Energy Professional Certifications	
B.4g.1. Number of Energy Auditors	
B.4g.2. Number of Retrofit Installer Technicians	
B.4g.3. Number of Crew Leaders	
B.4g.4. Number of Quality Control Inspectors (QCI)	
B.4h. Number of LEED Risk Certified assessors	
B.4i. Number of Building Performance Institute (BPI) certified professionals	
B.4j. Number of Classroom Assessment Scoring System (CLASS) certified professionals	
B.4k. Number of Certified Housing Quality Standards (HQS) Inspectors	
B.4l. Number of American Institute of Certified Planners (AICP)	
B.4m. Other ( <i>Please specify others below</i> ):	

<b>B.5. Number of organizations, both public and private, that the CSBG Eligible Entity actively works with to expand resources and opportunities in order to achieve family and community outcomes:</b>	<b>Unduplicated Number of Organizations</b>
B.5a. Non-Profit	
B.5b. Faith Based	
B.5c. Local Government	
B.5d. State Government	
B.5e. Federal Government	
B.5f. For-Profit Business or Corporation	
B.5g. Consortia/Collaborations	
B.5h. School Districts	
B.5i. Institutions of Post-Secondary Education/Training	
B.5j. Financial/Banking Institutions	
B.5k. Health Service Organizations	
B.5l. Statewide Associations or Collaborations	

Name of CSBG Eligible Entity Reporting:									
State:					UEI:				
C.1. CSBG Eligible Entity Reporting Period									
C.1a. July 1 - June 30					"X" auto-populated from Module 2, Section A				
C.1b. October 1 - September 30									
C.1c. January 1 - December 31									
C.2. Amount of FY 20XX CSBG allocated to reporting entity									
C.3. Federal Resources Allocated (Other than CSBG)									
C.3a. Weatherization (DOE) (include oil overcharge \$\$)									
C.3a.					C.3a.				
C.3b. Health and Human Services (HHS)									
C.3b.1. LIHEAP - Fuel Assistance (include oil overcharge \$\$)					C.3b.1.				
C.3b.2. LIHEAP - Weatherization (include oil overcharge \$\$)					C.3b.2.				
C.3b.3. Head Start					C.3b.3.				
C.3b.4. Early Head Start					C.3b.4.				
C.3b.5. Older Americans Act					C.3b.5.				
C.3b.6. Social Services Block Grant (SSBG)					C.3b.6.				
C.3b.7. Medicare/Medicaid					C.3b.7.				
C.3b.8. Assets for Independence (AFI)					C.3b.8.				
C.3b.9. Temporary Assistance for Needy Families (TANF)					C.3b.9.				
C.3b.10. Child Care Development Block Grant (CCDBG)					C.3b.10.				
C.3b.11. Community Economic Development (CED)					C.3b.11.				
C.3b.12. Other HHS Resources									
C.3b.12.i.					CFDA #:		C.3b.12.i.		
C.3b.12.ii.					CFDA #:		C.3b.12.ii.		
C.3b.12.iii.					CFDA #:		C.3b.12.iii.		
C.3b.12.iv.					CFDA #:		C.3b.12.iv.		
C.3b.12.v.					CFDA #:		C.3b.12.v.		
C.3b.12.vi.					CFDA #:		C.3b.12.vi.		
C.3b.12.vii.					CFDA #:		C.3b.12.vii.		
C.3b.12.viii.					CFDA #:		C.3b.12.viii.		
C.3b.12.ix.					CFDA #:		C.3b.12.ix.		
C.3b.12.x.					CFDA #:		C.3b.12.x.		
C.3b.13. Total Other HHS Resources (autocalculated)					C.3b.13. \$ -				
C.3c. Department of Agriculture (USDA)									
C.3c.1. Special Supplemental Nutrition for Women, Infants, and Children (WIC)					C.3c.1.				
C.3c.2. All USDA Non-Food programs (e.g. rural development)					C.3c.2.				
C.3c.3. All other USDA Food programs					C.3c.3.				
C.3d. Department of Housing and Urban Development (HUD)									
C.3d.1. Community Development Block Grant (CDBG) - Federal, State, and Local					C.3d.1.				
C.3d.2. Section 8					C.3d.2.				
C.3d.3. Section 202					C.3d.3.				
C.3d.4. Home Tenant-Based Rental Assistance (HOME TBRA)					C.3d.4.				
C.3d.5. HOPE for Homeowners Program (H4H)					C.3d.5.				
C.3d.6. Emergency Solutions Grant (ESG)					C.3d.6.				
C.3d.7. Continuum of Care (CoC)					C.3d.7.				
C.3d.8. All other HUD programs, including homeless programs					C.3d.8.				
C.3e. Department of Labor (DOL)									
C.3e.1. Workforce Innovation and Opportunity Act (WIOA) *previously WIA					C.3e.1.				
C.3e.2. Other DOL Employment and Training programs					C.3e.2.				
C.3e.3. All other DOL programs					C.3e.3.				
C.3f. Corporation for National and Community Service (CNCS) programs									
C.3f.					C.3f.				
C.3g. Federal Emergency Management Agency (FEMA)									
C.3g.					C.3g.				
C.3h. Department of Transportation									
C.3h.					C.3h.				
C.3i. Department of Education									
C.3i.					C.3i.				
C.3j. Department of Justice									
C.3j.					C.3j.				
C.3k. Department of Treasury									
C.3k.					C.3k.				
C.3l. Other Federal Resources									
C.3l.i.					CFDA #:		C.3l.i.		
C.3l.ii.					CFDA #:		C.3l.ii.		
C.3l.iii.					CFDA #:		C.3l.iii.		
C.3l.iv.					CFDA #:		C.3l.iv.		
C.3l.v.					CFDA #:		C.3l.v.		
C.3l.vi.					CFDA #:		C.3l.vi.		
C.3l.vii.					CFDA #:		C.3l.vii.		
C.3l.viii.					CFDA #:		C.3l.viii.		
C.3l.ix.					CFDA #:		C.3l.ix.		
C.3l.x.					CFDA #:		C.3l.x.		
C.3m. Total Other Federal Resources (autocalculated)					C.3m. \$ -				
C.3n. Total: Non-CSBG Federal Resources Allocated (autocalculated)					C.3n. \$ -				



**C.4. State Resources Allocated**

C.4a.	State appropriated funds used for the same purpose as Federal CSBG funds	C.4a.	
C.4b.	State Housing and Homeless programs ( <i>include housing tax credits</i> )	C.4b.	
C.4c.	State Nutrition programs	C.4c.	
C.4d.	State Early Childhood Programs ( <i>e.g. Head Start, Day Care</i> )	C.4d.	
C.4e.	State Energy programs	C.4e.	
C.4f.	State Health programs	C.4f.	
C.4g.	State Youth Development programs	C.4g.	
C.4h.	State Employment and Training programs	C.4h.	
C.4i.	State Senior programs	C.4i.	
C.4j.	State Transportation programs	C.4j.	
C.4k.	State Education programs	C.4k.	
C.4l.	State Community, Rural and Economic Development programs	C.4l.	
C.4m.	State Family Development programs	C.4m.	
C.4n.	<b>Other State Resources</b>		
C.4n.i.		C.4n.i.	
C.4n.ii.		C.4n.ii.	
C.4n.iii.		C.4n.iii.	
C.4n.iv.		C.4n.iv.	
C.4n.v.		C.4n.v.	
C.4n.vi.		C.4n.vi.	
C.4n.vii.		C.4n.vii.	
C.4n.viii.		C.4n.viii.	
C.4n.ix.		C.4n.ix.	
C.4n.x.		C.4n.x.	
<b>C.4o. Total Other State Resources (autocalculated)</b>		C.4o.	\$ -

<b>C.4p. Total: State Resources Allocated (autocalculated)</b>	C.4p.	\$ -
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**C.4q.** *If any of these resources were also reported under Item C.3n. (Federal Resources), please estimate the amount.* C.4q.

**C.5. Local Resources Allocated**

C.5a.	Amount of unrestricted funds appropriated by local government	C.5a.	
C.5b.	Amount of restricted funds appropriated by local government	C.5b.	
C.5c.	Value of Contract Services	C.5c.	
C.5d.	Value of in-kind goods/services received from local government	C.5d.	

<b>C.5e. Total: Local Resources Allocated (autocalculated)</b>	C.5e.	\$ -
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<b>C.5f.</b> <i>If any of these resources were also reported under Item C.3n. or C.4p. (Federal or State Resources), please estimate the amount.</i>	C.5f.	
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**C.6. Private Sector Resources Allocated**

C.6a.	Funds from foundations, corporations, United Way, other nonprofits	C.6a.	
C.6b.	Other donated funds	C.6b.	
C.6c.	Value of other donated items, food, clothing, furniture, etc.	C.6c.	
C.6d.	Value of in-kind services received from businesses	C.6d.	
C.6e.	Payments by clients for services	C.6e.	
C.6f.	Payments by private entities for goods or services for low income clients or communities	C.6f.	

<b>C.6g. Total: Private Sector Resources Allocated (autocalculated)</b>	C.6g.	\$ -
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<b>C.6h.</b> <i>If any of these resources were also reported under Item C.3n., C.4p. or C.5e. (Federal, State or Local Resources), please estimate the amount.</i>	C.6h.	
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<b>C.7. Total Non-CSBG Resources Allocated: (Federal, State, Local &amp; Private) (autocalculated)</b>	C.7.	\$ -
<b>C.8. Total Resources in CSBG Eligible Entity (including CSBG) (autocalculated)</b>	C.8.	\$ -

Note : \* All totals are autocalculated





## Community Level – Module 3

Note: The data collected in this module relates to **Goal 2: Communities where people with low incomes live are healthy and offer economic opportunity** and **Goal 3: People with low incomes are engaged and active in building opportunities in communities.**

## Instructional Notes

### Module 3, Section A: Community Initiative Status Form

**Section A: Community Initiative Status Form** is where CSBG Eligible Entities identify initiatives intended to achieve community level outcomes. This form provides a central place to report valuable information about a single community initiative that started, continued, or ended during the current reporting period. The information reported on the status form will be selected via a dropdown menu or written as a narrative.

### Module 3, Section B: Community National Performance Indicators (NPIs) - Data Entry Form

**Section B: Community NPIs Data Entry Form** provides an opportunity for CSBG Eligible Entities to enter data for the community level outcomes reported in Section A, Line 14. Entities may select from the indicators outlined in this section, or create their own indicator if none of the provided indicators captures what the CSBG Eligible Entity is trying to achieve. To facilitate the reporting, use, and learning from Community NPIs the Annual Report provides two types of indicators (**Counts of Change** and **Rates of Change**).

The first way to report impact is the **Counts of Change** indicators. These are basic measures that provide the number of units being measured, e.g. jobs, houses, resources, etc. that have been added (created) or subtracted (eliminated), and in some cases maintained, in the community the CSBG Eligible Entity has targeted.

The second way to report impact is the **Rates of Change** indicators. While requiring a bit more information, these indicators tell the full story of the *magnitude of the impact* a community initiative (usually involving multiple organizations) has had in a community.

### Module 3, Section C: Community Strategies List

**Section C: Community Strategies List** provides a basic identification of strategies, arranged by Domain and by topic area. The list cannot be all-inclusive; as such, an “other” category is included. This standardized list will aid in local and state analysis of the relationship between community-level strategies and outcomes.

### Module 3, Section A: Community Initiative Status Form

<b>Name of CSBG Eligible Entity Reporting:</b>	
<b>State:</b>	<b>UEI:</b>
	<b>Use the dropdown menu to select the response where appropriate.</b>
<b>1. Initiative Name</b>	
<b>2. Initiative Year</b>	1-7+ years
<b>3. Problem Identification</b>	Narrative (Provide a narrative on the scope of the problem)
<b>4. Goal/Agenda</b>	Narrative (Provide a narrative on the goal/agenda)
<b>5. Issue/CSBG Community Domains</b>	Employment; Education and Cognitive Development; Income, Infrastructure, and Asset Building; Housing; Health and Social/Behavioral Development; or Civic Engagement and Community Involvement
<b>6. Ultimate Expected Outcome</b>	Community Level National Performance Indicators (NPIs) (Reference the Community NPIs listed in Section B)
<b>7. Identified Community</b>	Neighborhood, City, School District, County, Service Area, State, Region, or Other
<b>8. Expected Duration</b>	Narrative (Provide the range in years, e.g. 1-3 years)
<b>9. Partnership Type</b>	Independent CAA Initiative, CAA is the core organizer of multi-partner Initiative, or CAA is one of multiple active investors and partners
<b>10. Partners</b>	Narrative (Provide a narrative on the key 1-3 partners)
<b>11. Strategy(ies)</b>	Select from the Community Level Strategies listed in Section C
<b>12. Progress on Outcomes/Indicators</b>	No Outcomes to Report, Interim Outcomes, Final Outcomes
<b>13. Impact of Outcomes</b>	Narrative (Provide additional information on the scope of the impact of these outcomes. e.g. If an initiative created a health clinic, please describe how many individuals and families are expected to be impacted.)
<b>14. Outcomes/Indicators to Report</b>	Community Level National Performance Indicators (NPIs) (Reference the Community NPIs listed in Section B)
<b>15. Final Status</b>	Initiative Active, Initiative Ended Early, Initiative Ended as Planned, Completed Still Delivering Value
<b>16. Lessons Learned</b>	Narrative

## Employment Indicators

<b>Name of CSBG Eligible Entity Reporting:</b>						
<b>State:</b>			<b>UEI:</b>			
<b>Counts of Change</b>	<b>Counts of Change for Employment Indicators (CNPI 1)</b>		<b>I.) Identified Community</b> (auto-populated)	<b>II.) Target</b> (#)	<b>III.) Actual Results</b> (#)	<b>IV.) Performance target accuracy</b> (% auto calculated)
	CNPI 1a Number of jobs <b>created</b> to increase opportunities for people with low incomes in the identified community.					#DIV/0!
	CNPI 1b Number of job opportunities <b>maintained</b> in the identified community.					#DIV/0!
	CNPI 1c Number of “living wage” jobs <b>created</b> in the identified community*.					#DIV/0!
	CNPI 1d Number of “living wage” jobs <b>maintained</b> in the identified community*.					#DIV/0!
	CNPI 1e Number of jobs <b>created</b> in the identified community with a benefit package.					#DIV/0!

\*When reporting on indicators related to living wage, agencies can provide their own definition or select from national or locally-defined models. Please indicate the living wage definition used in the General Comment box.

<b>Other Counts of Change</b>	<b>Other Counts of Change for Employment Indicators (CNPI 1z) - Please specify below.</b>		<b>I.) Identified Community</b> (auto-populated)	<b>II.) Target</b> (#)	<b>III.) Actual Results</b> (#)	<b>IV.) Performance target accuracy</b> (% auto calculated)
	CNPI 1z.1 Other					#DIV/0!
	CNPI 1z.2 Other					#DIV/0!
	CNPI 1z.3 Other					#DIV/0!

<b>Rates of Change</b>	<b>Rates of Change for Employment Indicators (CNPI 1)</b>		<b>I.) Identified Community</b> (auto-populated)	<b>II.) Baseline</b> existing starting point used for comparisons (%)	<b>III.) Target</b> (%)	<b>IV.) Expected % change from baseline</b> (Target % auto calculated)	<b>V.) Actual Results</b> (%)	<b>VI.) Actual % change from baseline</b> (% auto calculated)	<b>VII.) Performance target accuracy</b> (% auto calculated)
	CNPI 1f Percent decrease of the <b>unemployment rate</b> .					#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 1g Percent decrease of the <b>youth unemployment rate</b> .					#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 1h Percent decrease of the <b>underemployment rate</b> .					#DIV/0!		#DIV/0!	#DIV/0!

<b>Other Rates of Change</b>	<b>Other Rates of Change for Employment Indicators (CNPI 1z)</b> - Please specify below.		<b>I.) Identified Community</b> (auto-populated)	<b>II.) Baseline</b> existing starting point used for comparisons (%)	<b>III.) Target</b> (%)	<b>IV.) Expected % change from baseline</b> (Target % auto calculated)	<b>V.) Actual Results</b> (%)	<b>VI.) Actual % change from baseline</b> (% auto calculated)	<b>VII.) Performance target accuracy</b> (% auto calculated)
	CNPI 1z.4 Other					#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 1z.5 Other					#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 1z.6 Other					#DIV/0!		#DIV/0!	#DIV/0!

**General comments:**

Name of CSBG Eligible Entity Reporting:					
State:		UEI:			
Counts of Change	Counts of Change for Education and Cognitive Development Indicators (CNPI 2)	I.) Identified Community (auto-populated)	II.) Target (#)	III.) Actual Results (#)	IV.) Performance target accuracy (% auto calculated)
	CNPI 2a Number of accessible and affordable <b>early childhood or pre-school education</b> assets or resources added to the identified community.				#DIV/0!
	CNPI 2b Number of accredited or licensed <b>affordable child care facilities</b> added in the identified community.				#DIV/0!
	CNPI 2c Number of new <b>Early Childhood Screenings</b> offered to <b>children</b> (ages 0-5) of families with low-incomes in the identified community.				#DIV/0!
	CNPI 2d Number of accessible and affordable education assets or resources added for <b>school age children</b> in the identified community. (e.g., academic, enrichment activities, before/after school care, summer programs)				#DIV/0!
	CNPI 2e Number of accessible and affordable <b>post secondary education</b> assets or resources added for newly graduating <b>youth</b> in the identified community. (e.g. college tuition, scholarships, vocational training, etc.)				#DIV/0!
	CNPI 2f Number of accessible and affordable <b>basic or secondary education</b> assets or resources added for <b>adults</b> in the identified community. (e.g. literacy, ESL, ABE/GED, etc.)				#DIV/0!
Other Counts of Change	Other Counts of Change for Education and Cognitive Development Indicators (CNPI 2z) - Please specify below.	I.) Identified Community (auto-populated)	II.) Target (#)	III.) Actual Results (#)	IV.) Performance target accuracy (% auto calculated)
	CNPI 2z.1 Other				#DIV/0!
	CNPI 2z.2 Other				#DIV/0!
	CNPI 2z.3 Other				#DIV/0!

Rates of Change	Rates of Change for Education and Cognitive Development Indicators (CNPI 2)	I.) Identified Community (auto-populated)	II.) Baseline existing starting point used for comparisons (%)	III.) Target (%)	IV.) Expected % change from baseline (Target % auto calculated)	V.) Actual Results (%)	VI.) Actual % change from baseline (% auto calculated)	VII.) Performance target accuracy (% auto calculated)
	CNPI 2g Percent increase of <b>children</b> in the identified community who are <b>kindergarten ready</b> .				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 2h Percent increase of <b>children</b> in the identified community at (or above) the <b>basic reading level</b> .				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 2i Percent increase of <b>children</b> in the identified community at (or above) the <b>basic math level</b> .				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 2j Percent increase in high school (or high school equivalency) <b>graduation rate</b> in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 2k Percent increase of the rate of <b>youth</b> in the identified community who <b>attend post-secondary education</b> .				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 2l Percent increase of the rate of <b>youth</b> in the identified community who <b>graduate from post-secondary education</b> .				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 2m Percent increase of <b>adults</b> in the identified community who <b>attend post-secondary education</b> .				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 2n Percent increase of <b>adults</b> in the identified community who <b>graduate from post-secondary education</b> .				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 2o Percent increase in the <b>adult literacy rate</b> in the identified community .				#DIV/0!		#DIV/0!	#DIV/0!

Other Rates of Change	Other Rates of Change for Education and Cognitive Development Indicators (CNPI 2z) - Please specify below.	I.) Identified Community (auto populated)	II.) Baseline existing starting point used for comparisons (%)	III.) Target (%)	IV.) Expected % change from baseline (Target % auto calculated)	V.) Actual Results (%)	VI.) Actual % change from baseline (% auto calculated)	VII.) Performance target accuracy (% auto calculated)
	CNPI 2z.4 Other				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 2z.5 Other				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 2z.6 Other				#DIV/0!		#DIV/0!	#DIV/0!

General comments:

Name of CSBG Eligible Entity Reporting:						
State:		UEI:				
Counts of Change	Counts of Change for Infrastructure and Asset Building Indicators (CNPI 3)		I.) Identified Community (auto-populated)	II.) Target (#)	III.) Actual Results (#)	IV.) Performance target accuracy (% auto calculated)
	CNPI 3a Number of <b>new</b> accessible assets/resources <b>created</b> in the identified community:					
	CNPI 3a.1 Commercial					#DIV/0!
	CNPI 3a.2 Financial					#DIV/0!
	CNPI 3a.3 Technological/ Communications (e.g. broadband)					#DIV/0!
	CNPI 3a.4 Transportation					#DIV/0!
	CNPI 3a.5 Recreational (e.g. parks, gardens, libraries)					#DIV/0!
	CNPI 3a.6 Other Public Assets/Physical Improvements					#DIV/0!
	CNPI 3b Number of <b>existing</b> assets/resources <b>made accessible</b> to the identified community:					
	CNPI 3b.1 Commercial					#DIV/0!
	CNPI 3b.2 Financial					#DIV/0!
	CNPI 3b.3 Technological/ Communications (e.g. broadband)					#DIV/0!
	CNPI 3b.4 Transportation					#DIV/0!
	CNPI 3b.5 Recreational (e.g. parks, gardens, libraries)					#DIV/0!
CNPI 3b.6 Other Public Assets/Physical Improvements					#DIV/0!	
Other Counts of Change	Other Counts of Change for Infrastructure and Asset Building Indicators (CNPI 3z) - Please specify below.		I.) Identified Community (auto populated)	II.) Target (#)	III.) Actual Results (#)	IV.) Performance target accuracy (% auto calculated)
	CNPI 3z.1 Other					#DIV/0!
	CNPI 3z.2 Other					#DIV/0!
	CNPI 3z.3 Other					#DIV/0!



Rates of Change	Rates of Change for Infrastructure and Asset Building Indicators (CNPI 3)	I.) Identified Community (auto-populated)	II.) Baseline existing starting point used for comparisons (%)	III.) Target (%)	IV.) Expected % change from baseline (Target % auto calculated)	VII.) Performance target accuracy (% auto calculated)
	CNPI 3c Percent decrease of <b>abandoned or neglected buildings</b> in the identified community.				#DIV/0!	#REF!
	CNPI 3d Percent decrease in <b>emergency response time</b> measured in minutes in the identified community. (EMT, Police, Fire, etc.).				#DIV/0!	#REF!
	CNPI 3e Percent decrease of <b>predatory lenders and/or lending practices</b> in the identified community.				#DIV/0!	#REF!
	CNPI 3f Percent decrease of <b>environmental threats</b> to households (toxic soil, radon, lead, air quality, quality of drinking water, etc.) in the identified community.				#DIV/0!	#REF!
	CNPI 3g Percent increase of <b>transportation services</b> in the identified community.				#DIV/0!	#REF!
Other Rates of Change	Other Rates of Change for Infrastructure and Asset Building Indicators (CNPI 3z) - Please specify below.	I.) Identified Community (auto-populated)	II.) Baseline existing starting point used for comparisons (%)	III.) Target (%)	IV.) Expected % change from baseline (Target % auto calculated)	VII.) Performance target accuracy (% auto calculated)
	CNPI 3z.4 Other				#DIV/0!	#REF!
	CNPI 3z.5 Other				#DIV/0!	#REF!
	CNPI 3z.6 Other				#DIV/0!	#REF!

General comments:

Name of CSBG Eligible Entity Reporting:					
State:		UEI:			
Counts of Change	Counts of Change for Housing Indicators (CNPI 4)	I.) Identified Community (auto-populated)	II.) Target (#)	III.) Actual Results (#)	IV.) Performance target accuracy (% auto calculated)
	CNPI 4a Number of safe and affordable housing units <b>developed</b> in the identified community (e.g. built or set aside units for people with low incomes).				#DIV/0!
	CNPI 4b Number of safe and affordable housing units <b>maintained</b> and/or <b>improved</b> through WAP or other rehabilitation efforts in the identified community.				#DIV/0!
	CNPI 4c Number of shelter beds <b>created</b> in the identified community.				#DIV/0!
	CNPI 4d Number of shelter beds <b>maintained</b> in the identified community.				#DIV/0!
Other Counts of Change	Other Counts of Change for Housing Indicators (CNPI 4z) - Please specify below.	I.) Identified Community (auto-populated)	II.) Target (#)	III.) Actual Results (#)	IV.) Performance target accuracy (% auto calculated)
	CNPI 4z.1 Other				#DIV/0!
	CNPI 4z.2 Other				#DIV/0!
	CNPI 4z.3 Other				#DIV/0!

	<b>Rates of Change for Housing Indicators (CNPI 4)</b>	<b>I.) Identified Community</b> (auto-populated)	<b>II.) Baseline</b> existing starting point used for comparisons (%)	<b>III.) Target</b> (%)	<b>IV.) Expected % change from baseline</b> (Target % auto calculated)	<b>V.) Actual Results</b> (%)	<b>VI.) Actual % change from baseline</b> (% auto calculated)	<b>VII.) Performance target accuracy</b> (% auto calculated)
<b>Rates of Change</b>	CNPI 4e Percent decrease in the <b>rate of homelessness</b> in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 4f Percent decrease in the <b>foreclosure rate</b> in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 4g Percent increase in the <b>rate of home ownership</b> of people with low incomes in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 4h Percent increase of <b>affordable housing</b> in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 4i Percent increase of <b>shelter beds</b> in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	<b>Other Rates of Change for Housing Indicators (CNPI 4z)</b> - Please specify below.	<b>I.) Identified Community</b> (auto populated)	<b>II.) Baseline</b> existing starting point used for comparisons (%)	<b>III.) Target</b> (%)	<b>IV.) Expected % change from baseline</b> (Target % auto calculated)	<b>V.) Actual Results</b> (%)	<b>VI.) Actual % change from baseline</b> (% auto calculated)	<b>VII.) Performance target accuracy</b> (% auto calculated)
<b>Other Rates of Change</b>	CNPI 4z.4 Other				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 4z.5 Other				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 4z.6 Other				#DIV/0!		#DIV/0!	#DIV/0!

General comments:

Name of CSBG Eligible Entity Reporting:									
State:				UEI:					
Counts of Change	Counts of Change for Health and Social/Behavioral Indicators (CNPI 5)				I.) Identified Community (auto-populated)	II.) Target (#)	III.) Actual Results (#)	IV.) Performance target accuracy (% auto calculated)	
	CNPI 5a Number of accessible and affordable <b>physical health</b> assets or resources created in the identified community.							#DIV/0!	
	CNPI 5b Number of accessible and affordable <b>behavioral and mental health</b> assets or resources created in the identified community.							#DIV/0!	
	CNPI 5c Number of <b>public safety</b> assets and resources created in the identified community.							#DIV/0!	
	CNPI 5d Number of accessible and affordable healthy <b>food resources</b> created in the identified community.							#DIV/0!	
	CNPI 5e Number of activities designed to <b>improve police and community relations</b> within the identified community.							#DIV/0!	
Other Counts of Change	Other Counts of Change for Health and Social/Behavioral Indicators (CNPI 5z) - Please specify below.				I.) Identified Community (auto-populated)	II.) Target (#)	III.) Actual Results (#)	IV.) Performance target accuracy (% auto calculated)	
	CNPI 5z.1 Other							#DIV/0!	
	CNPI 5z.2 Other							#DIV/0!	
	CNPI 5z.3 Other							#DIV/0!	
Rates of Change	Rates of Change for Physical Health, Wellbeing, and Development Indicators (CNPI 5)		I.) Identified Community (auto-populated)	II.) Baseline existing starting point used for comparisons (%)	III.) Target (%)	IV.) Expected % change from baseline (Target % auto calculated)	V.) Actual Results (%)	VI.) Actual % change from baseline (% auto calculated)	VII.) Performance target accuracy (% auto calculated)
	CNPI 5f Percent decrease in <b>infant mortality rate</b> in the identified community.					#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 5g Percent decrease in <b>childhood obesity rate</b> in the identified community.					#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 5h Percent decrease in <b>adult obesity rate</b> in the identified community.					#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 5i Percent increase in <b>child immunization rate</b> in the identified community.					#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 5j Percent decrease in <b>uninsured families</b> in the identified community.					#DIV/0!		#DIV/0!	#DIV/0!

	<b>Rates of Change for Behavioral and Mental health, Emotional Wellbeing, and Development Indicators (CNPI 5)</b>	<b>I.) Identified Community</b> (auto-populated)	<b>II.) Baseline</b> existing starting point used for comparisons (%)	<b>III.) Target</b> (%)	<b>IV.) Expected % change from baseline</b> (Target % auto calculated)	<b>V.) Actual Results</b> (%)	<b>VI.) Actual % change from baseline</b> (% auto calculated)	<b>VII.) Performance target accuracy</b> (% auto calculated)
<b>Rates of Change</b>	CNPI 5k Percent decrease in the <b>teen pregnancy rate</b> in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 5l Percent decrease in <b>unplanned pregnancies</b> in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 5m Percent decrease in <b>substance abuse rate</b> in the identified community.(e.g. cigarettes, prescription drugs, narcotics, alcohol).				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 5n Percent decrease in <b>domestic violence rate</b> in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 5o Percent decrease in the <b>child abuse rate</b> in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 5p Percent decrease in the <b>child neglect rate</b> in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 5q Percent decrease in the <b>elder abuse rate</b> in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 5r Percent decrease in the <b>elder neglect rate</b> in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	<b>Rates of Change for Public Safety Indicators (CNPI 5)</b>	<b>I.) Identified Community</b> (auto populated)	<b>II.) Baseline</b> existing starting point used for comparisons (%)	<b>III.) Target</b> (%)	<b>IV.) Expected % change from baseline</b> (Target % auto calculated)	<b>V.) Actual Results</b> (%)	<b>VI.) Actual % change from baseline</b> (% auto calculated)	<b>VII.) Performance target accuracy</b> (% auto calculated)
<b>Rates of Change</b>	CNPI 5s Percent decrease in <b>recidivism rate</b> in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 5t Percent decrease in <b>non-violent crime rate</b> in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 5u Percent decrease in <b>violent crime rate</b> in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 5v Percent decrease in <b>teens involved with the juvenile court system</b> in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	<b>Other Rates of Change for Health and Social/Behavioral Indicators (CNPI 5z)</b> - Please specify below.	<b>I.) Identified Community</b> (auto populated)	<b>II.) Baseline</b> existing starting point used for comparisons (%)	<b>III.) Target</b> (%)	<b>IV.) Expected % change from baseline</b> (Target % auto calculated)	<b>V.) Actual Results</b> (%)	<b>VI.) Actual % change from baseline</b> (% auto calculated)	<b>VII.) Performance target accuracy</b> (% auto calculated)
<b>Other Rates of Change</b>	CNPI 5z.4 Other				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 5z.5 Other				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 5z.6 Other				#DIV/0!		#DIV/0!	#DIV/0!

General comments:

Name of CSBG Eligible Entity Reporting:								
State:		UEI:						
Rates of Change	Rates of Change for Civic Engagement and Community Involvement Indicators - Goal 2 (CNPI 6)	I.) Identified Community (auto-populated)	II.) Baseline existing starting point used for comparisons (%)	III.) Target (%)	IV.) Expected % change from baseline (Target % auto calculated)	V.) Actual Results (%)	VI.) Actual % change from baseline (% auto calculated)	VII.) Performance target accuracy (% auto calculated)
	CNPI 6 G2a Percent increase of <b>donated time</b> to support the CSBG Eligible Entity's delivery of services and/or implementation of strategies to address conditions of poverty in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 6 G2b Percent increase of <b>donated resources</b> to support the CSBG Eligible Entity's delivery of services and/or implementation of strategies to address conditions of poverty in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 6 G2c Percent increase of <b>people participating</b> in public hearings, policy forums, community planning, or other advisory boards related to the CSBG Eligible Entity's delivery of service and/or implementation of strategies to address conditions of poverty in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!

Other Rates of Change	Other Rates of Change for Civic Engagement and Community Involvement Indicators - Goal 2 (CNPI 6 G2z) - Please specify below.	I.) Identified Community (auto-populated)	II.) Baseline existing starting point used for comparisons (%)	III.) Target (%)	IV.) Expected % change from baseline (Target % auto calculated)	V.) Actual Results (%)	VI.) Actual % change from baseline (% auto calculated)	VII.) Performance target accuracy (% auto calculated)
	CNPI 6 G2z.4 Other				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 6 G2z.5 Other				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 6 G2z.6 Other				#DIV/0!		#DIV/0!	#DIV/0!
Other Counts of Change	Other Counts of Change for Civic Engagement and Community Involvement Indicators - Goal 2 (CNPI 6 G2z) - Please specify below.	I.) Identified Community (auto-populated)	II.) Baseline existing starting point used for comparisons (%)	III.) Target (%)	IV.) Expected % change from baseline (Target % auto calculated)	V.) Actual Results (%)	VI.) Actual % change from baseline (% auto calculated)	VII.) Performance target accuracy (% auto calculated)
	CNPI 6 G2z.1 Other				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 6 G2z.2 Other				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 6 G2z.3 Other				#DIV/0!		#DIV/0!	#DIV/0!

General comments:

Name of CSBG Eligible Entity Reporting:								
State:		UEI:						
Rates of Change	Rates of Change for Civic Engagement and Community Involvement Indicators - Goal 3 (CNPI 6)	I.) Identified Community (auto-populated)	II.) Baseline existing starting point used for comparisons (%)	III.) Target (%)	IV.) Expected % change from baseline (Target % auto calculated)	V.) Actual Results (%)	VI.) Actual % change from baseline (% auto calculated)	VII.) Performance target accuracy (% auto calculated)
	CNPI 6 G3a Percent increase of people with low incomes <b>who support</b> the CSBG Eligible Entity's delivery of service and/or implementation of strategies to address conditions of poverty in the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 6 G3b Percent increase of people with low incomes <b>who acquire and maintain leadership roles</b> with the CSBG Eligible Entity or other organizations within the identified community.				#DIV/0!		#DIV/0!	#DIV/0!
Other Rates of Change	Other Rates of Change for Civic Engagement and Community Involvement Indicators - Goal 3 (CNPI 6 G3z) - Please specify below.	I.) Identified Community (auto-populated)	II.) Baseline existing starting point used for comparisons (%)	III.) Target (%)	IV.) Expected % change from baseline (Target % auto calculated)	V.) Actual Results (%)	VI.) Actual % change from baseline (% auto calculated)	VII.) Performance target accuracy (% auto calculated)
	CNPI 6 G3z.4 Other				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 6 G3z.5 Other				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 6 G3z.6 Other				#DIV/0!		#DIV/0!	#DIV/0!
Other Counts of Change	Other Counts of Change for Civic Engagement and Community Involvement Indicators - Goal 3 (CNPI 6 G3z) - Please specify below.	I.) Identified Community (auto-populated)	II.) Baseline existing starting point used for comparisons (%)	III.) Target (%)	IV.) Expected % change from baseline (Target % auto calculated)	V.) Actual Results (%)	VI.) Actual % change from baseline (% auto calculated)	VII.) Performance target accuracy (% auto calculated)
	CNPI 6 G3z.1 Other				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 6 G3z.2 Other				#DIV/0!		#DIV/0!	#DIV/0!
	CNPI 6 G3z.3 Other				#DIV/0!		#DIV/0!	#DIV/0!

General comments:

<b>Name of CSBG Eligible Entity Reporting:</b>	
<b>State:</b>	<b>UEI:</b>
	<b>Employment Strategies (STR 1)</b>
STR 1a	Minimum/Living Wage Campaign
STR 1b	Job Creation/Employment Generation
STR 1c	Job Fairs
STR 1d	Earned Income Tax Credit (EITC) Promotion
STR 1e	Commercial Space Development
STR 1f	Employer Education
STR 1g	Employment Policy Changes
STR 1h	Employment Legislative Changes
STR 1i	Other Employment Strategy: (please specify)

	<b>Education and Cognitive Development Strategies (STR 2)</b>
STR 2a	Preschool for All Campaign
STR 2b	Charter School Development
STR 2c	After School Enrichment Activities Promotion
STR 2d	Pre K-College/Community College Support
STR 2e	Children's Trust Fund Creation
STR 2f	Scholarship Creation
STR 2g	Child Tax Credit (CTC) Promotion
STR 2h	Adoption Child Care Quality Rating
STR 2i	Adult Education Establishment
STR 2j	Education and Cognitive Development Policy Changes
STR 2k	Education and Cognitive Development Legislative Changes
STR 2l	Other Education and Cognitive Development Strategy: (please specify)

	<b>Infrastructure and Asset Building Strategies (STR 3)</b>
STR 3a	Cultural Asset Creation
STR 3b	Police/Community Relations Campaign
STR 3c	Neighborhood Safety Watch Programs
STR 3d	Anti-Predatory Lending Campaign
STR 3e	Asset Building and Savings Promotion
STR 3f	Develop/Build/Rehab Spaces
STR 3g	Maintain or Host Income Tax Preparation Sites
STR 3h	Community-Wide Data Collection Systems Development
STR 3i	Local 211 or Resource/Referral System Development
STR 3j	Water/Sewer System Development
STR 3k	Community Financial Institution Creation
STR 3l	Infrastructure Planning Coalition
STR 3m	Park or Recreation Creation and Maintenance
STR 3n	Rehabilitation/Weatherization of Housing Stock
STR 3o	Community Center/Community Facility Establishment
STR 3p	Asset Limit Barriers for Benefits Policy Changes
STR 3q	Infrastructure and Asset Building Policy Changes
STR 3r	Infrastructure and Asset Building Legislative Changes
STR 3s	Other Infrastructure and Asset Building Strategy: (please specify)



	<b>Housing Strategies (STR 4)</b>
STR 4a	End Chronic Homelessness Campaign
STR 4b	New Affordable Single Unit Housing Creation
STR 4c	New Affordable Multi- Unit Housing Creation (Single Resident Occupancy (SRO), temporary housing, transitional housing)
STR 4d	Tenants' Rights Campaign
STR 4e	New Shelters Creation (including day shelters and domestic violence shelters)
STR 4f	Housing or Land Trust Creation
STR 4g	Building Codes Campaign
STR 4h	Housing Policy Changes
STR 4i	Housing Legislative Changes
STR 4j	Other Housing Strategy: (please specify)

	<b>Health and Social/Behavioral Development Strategies (STR 5)</b>
STR 5a	Health Specific Campaign
STR 5b	Farmers Market or Community Garden Development
STR 5c	Grocery Store Development
STR 5d	Gun Safety/Control Campaign
STR 5e	Healthy Food Campaign
STR 5f	Nutrition Education Collaborative
STR 5g	Food Bank Development
STR 5h	Domestic Violence Court Development
STR 5i	Drug Court Development
STR 5j	Alternative Energy Source Development
STR 5k	Develop or Maintain a Health Clinic
STR 5l	Health and Social/Behavioral Development Policy Changes
STR 5m	Health and Social/Behavioral Development Legislative Changes
STR 5n	Other Health and Social/Behavioral Development Strategy: (please specify)

	<b>Civic Engagement and Community Involvement Strategies - Goal 2 (STR 6 G2)</b>
STR 6 G2a	Development of Health and Social Service Provider Partnerships
STR 6 G2b	Recruiting and Coordinating Community Volunteers
STR 6 G2c	Poverty Simulations
STR 6 G2d	Attract Capital Investments
STR 6 G2e	Build/Support Increased Equity
STR 6 G2f	Equity Awareness Campaign
STR 6 G2g	Coordinated Community-wide Needs Assessment
STR 6 G2h	Civic Engagement and Community Involvement in Advocacy Efforts
STR 6 G2i	Civic Engagement Policy Changes
STR 6 G2j	Civic Engagement Legislative Changes
STR 6 G2k	Other Civic Engagement and Community Involvement Strategy: (please specify)

	<b>Civic Engagement and Community Involvement Strategies - Goal 3 (STR 6 G3)</b>
STR 6 G3a	Empowerment of Individuals/Families with Low-Incomes
STR 6 G3b	Campaign to Ensure Individuals with Low-Incomes are Represented on Local Governing Bodies
STR 6 G3c	Social Capital Building Campaign for Individuals/Families with Low-Incomes
STR 6 G3d	Campaign for Volunteer Placement and Coordination
STR 6 G3e	Civic Engagement Policy Changes
STR 6 G3f	Civic Engagement Legislative Changes
STR 6 G3g	Other Civic Engagement and Community Involvement Strategy: (please specify)

	<b>Community Support Strategies (STR 7)</b>
STR 7a	Off-Hours (Non-Traditional Hours) Child Care Development
STR 7b	Transportation System Development
STR 7c	Transportation Services Coordination and Support
STR 7d	Community Support Policy Changes
STR 7e	Community Support Legislative Changes
STR 7f	Other Community Support Strategy: (please specify)

	<b>Emergency Management Strategies (STR 8)</b>
STR 8a	State or Local Emergency Management Board Enhancement
STR 8b	Community wide Emergency Disaster Relief Service Creation
STR 8c	Disaster Preparation Planning
STR 8d	Emergency Management Policy Changes
STR 8e	Emergency Management Legislative Changes
STR 8f	Other Emergency Management Strategy: (please specify)

## Individual and Family Level – Module 4

Note: The data collected in this module relates to **Goal 1: Individuals and families with low incomes are stable and achieve economic security.**

## Instructional Notes

### Module 4, Section A: Individual and Family National Performance Indicators (NPIs) - Data Entry Form

**Section A: Individual and Family NPIs Data Entry Form** is comprised of indicators to report outcomes that fall under National Goal 1: Individuals and families with low incomes are stable and achieve economic security. The indicators are the vehicle by which CSBG Eligible Entities measure and report the outcomes they have achieved for individuals and families. All Individual and Family NPIs are **optional**, and there is a category for "Other Outcome Indicator".

### Module 4, Section B: Individual and Family Services - Data Entry Form

**Section B: Individual and Family Services Data Entry Form** provides information on the work CSBG Eligible Entities did to help individuals and families achieve the outcomes listed in Section A. This standardized Individual and Family Services list will aid in analysis of the relationship between people, services, and outcomes.

### Module 4, Section C: All Characteristics Report - Data Entry Form

**Section C: The All Characteristics Report Data Entry Form** collects data on all individuals and households, whether or not funded directly by CSBG. This demographic information strengthens the CSBG Annual Report by demonstrating who is being served by CSBG Eligible Entities.

Name of CSBG Eligible Entity Reporting:					
State:		UEI:			
Employment (FNPI 1)	I.) Number of Individuals Served in program(s) (#)	II.) Target (#)	III.) Actual Results (#)	IV.) Percentage Achieving Outcome [III/ I = IV ] (% auto calculated)	V.) Performance Target Accuracy (III/II = V) (% auto calculated)
FNPI 1a The number of unemployed <b>youth</b> who obtained employment to gain skills or income.				#DIV/0!	#DIV/0!
FNPI 1b The number of unemployed <b>adults</b> who obtained employment ( <b>up to a living wage</b> ).				#DIV/0!	#DIV/0!
FNPI 1c The number of unemployed <b>adults</b> who obtained and maintained employment for at least 90 days ( <b>up to a living wage</b> ).				#DIV/0!	#DIV/0!
FNPI 1d The number of unemployed <b>adults</b> who obtained and maintained employment for at least 180 days ( <b>up to a living wage</b> ).				#DIV/0!	#DIV/0!
FNPI 1e The number of unemployed <b>adults</b> who obtained employment ( <b>with a living wage or higher</b> ).				#DIV/0!	#DIV/0!
FNPI 1f The number of unemployed <b>adults</b> who obtained and maintained employment for at least 90 days ( <b>with a living wage or higher</b> ).				#DIV/0!	#DIV/0!
FNPI 1g The number of unemployed <b>adults</b> who obtained and maintained employment for at least 180 days ( <b>with a living wage or higher</b> ).				#DIV/0!	#DIV/0!

Employment (FNPI 1)	I.) Number of Individuals Served in program(s) (#)	II.) Target (#)	III.) Actual Results (#)	IV.) Percentage Achieving Outcome [III/ I = IV ] (% auto calculated)	V.) Performance Target Accuracy (III/II = V) (% auto calculated)
FNPI 1h The number of employed participants in a career-advancement related program who <b>entered or transitioned</b> into a position that provided increased income and/or benefits.				#DIV/0!	#DIV/0!
FNPI 1h.1 Of the above, the number of employed participants who Increased income from employment through <b>wage or salary amount increase</b> .				#DIV/0!	#DIV/0!
FNPI 1h.2 Of the above, the number of employed participants who increased income from employment through <b>hours worked increase</b> .				#VALUE!	#DIV/0!
FNPI 1h.3 Of the above, the number of employed participants who <b>increased benefits</b> related to employment.				#DIV/0!	#DIV/0!

Name of CSBG Eligible Entity Reporting:					
Other Employment Outcome Indicator (FNPI 1z)	I.) Number of Individuals Served in program(s) (#)	II.) Target (#)	III.) Actual Results (#)	IV.) Percentage Achieving Outcome [III/ I = IV ] (% auto calculated)	V.) Performance Target Accuracy (III/II = V] (% auto calculated)
FNPI 1z.1 The number of individuals _____.				#DIV/0!	#DIV/0!

Comments:

## Education and Cognitive Development Indicators

Name of CSBG Eligible Entity Reporting:					
State:	UEI:				
Education and Cognitive Development (FNPI 2)	I.) Number of Individuals Served in program(s) (#)	II.) Target (#)	III.) Actual Results (#)	IV.) Percentage Achieving Outcome [III/ I = IV ] (%) auto calculated)	V.) Performance Target Accuracy (III/II = V] (%) auto calculated)
FNPI 2a The number of <b>children</b> (0 to 5) who demonstrated improved emergent literacy skills.				#DIV/0!	#DIV/0!
FNPI 2b The number of <b>children</b> (0 to 5) who demonstrated skills for school readiness.				#DIV/0!	#DIV/0!
FNPI 2c The number of <b>children</b> and <b>youth</b> who demonstrated improved positive approaches toward learning, including improved attention skills. (auto total).	0	0	0	#DIV/0!	#DIV/0!
FNPI 2c.1 Early Childhood Education (ages 0-5)				#DIV/0!	#DIV/0!
FNPI 2c.2 1st grade-8th grade				#DIV/0!	#DIV/0!
FNPI 2c.3 9th grade-12th grade				#DIV/0!	#DIV/0!
FNPI 2d The number of <b>children</b> and <b>youth</b> who are achieving at basic grade level (academic, social, and other school success skills). (auto total)	0	0	0	#DIV/0!	#DIV/0!
FNPI 2d.1 Early Childhood Education (ages 0-5)				#DIV/0!	#DIV/0!
FNPI 2d.2 1st grade-8th grade				#DIV/0!	#DIV/0!
FNPI 2d.3 9th grade-12th grade				#DIV/0!	#DIV/0!
FNPI 2e The number of <b>parents/caregivers</b> who improved their home environments.				#DIV/0!	#DIV/0!
FNPI 2f The number of <b>adults</b> who demonstrated improved basic education.				#DIV/0!	#DIV/0!
FNPI 2g The number of <b>individuals</b> who obtained a high school diploma and/or obtained an equivalency certificate or diploma.				#DIV/0!	#DIV/0!
FNPI 2h The number of <b>individuals</b> who obtained a recognized credential, certificate, or degree relating to the achievement of educational or vocational skills.				#DIV/0!	#DIV/0!
FNPI 2i The number of <b>individuals</b> who obtained an Associate's degree.				#DIV/0!	#DIV/0!
FNPI 2j The number of <b>individuals</b> who obtained a Bachelor's degree.				#DIV/0!	#DIV/0!

Other Education and Cognitive Development Outcome Indicator (FNPI 2z)	I.) Number of Individuals Served in program(s) (#)	II.) Target (#)	III.) Actual Results (#)	IV.) Percentage Achieving Outcome [III/ I = IV ] (%) auto calculated)	V.) Performance Target Accuracy (III/II = V] (%) auto calculated)
FNPI 2z.1 The number of individuals _____.				#DIV/0!	#DIV/0!

**Comments:**

## Income and Asset Building Indicators

Name of CSBG Eligible Entity Reporting:					
State:	UEI:				
Income and Asset Building (FNPI 3)	I.) Number of Individuals Served in program(s) (#)	II.) Target (#)	III.) Actual Results (#)	IV.) Percentage Achieving Outcome [III/I = IV ] (% auto calculated)	V.) Performance Target Accuracy (III/II = V) (% auto calculated)
FNPI 3a The number of individuals who achieved and maintained capacity to meet basic needs for <b>90 days</b> .				#DIV/0!	#DIV/0!
FNPI 3b The number of individuals who achieved and maintained capacity to meet basic needs for <b>180 days</b> .				#DIV/0!	#DIV/0!
FNPI 3c The number of individuals who opened a <b>savings account or IDA</b> .				#DIV/0!	#DIV/0!
FNPI 3d The number of individuals who <b>increased their savings</b> .				#DIV/0!	#DIV/0!
FNPI 3e The number of individuals who used their savings to <b>purchase an asset</b> .				#DIV/0!	#DIV/0!
FNPI 3f The number of individuals who purchased a home.					
FNPI 3g The number of individuals who <b>improved their credit scores</b> .				#DIV/0!	#DIV/0!
FNPI 3h The number of individuals who <b>increased their net worth</b> .				#DIV/0!	#DIV/0!
FNPI 3i The number of individuals engaged with the Community Action Agency who report <b>improved financial well-being</b> .				#DIV/0!	#DIV/0!

Other Income and Asset Building Outcome Indicator (FNPI 3z)	I.) Number of Individuals Served in program(s) (#)	II.) Target (#)	III.) Actual Results (#)	IV.) Percentage Achieving Outcome [III/I = IV ] (% auto calculated)	V.) Performance Target Accuracy (III/II = V) (% auto calculated)
FNPI 3z.1 The number of individuals _____.				#DIV/0!	#DIV/0!

Comments:



## Housing Indicators

Name of CSBG Eligible Entity Reporting:						
State:	UEI:					
Housing (FNPI 4)	I.) Number of Individuals Served in program(s) (#)	II.) Target (#)	III.) Actual Results (#)	IV.) Percentage Achieving Outcome [III/ I = IV ] (% auto calculated)	V.) Performance Target Accuracy (III/II = V) (% auto calculated)	
FNPI 4a The number of individuals experiencing homelessness who obtained <b>safe temporary shelter</b> .				#DIV/0!	#DIV/0!	
FNPI 4b The number of individuals who obtained <b>safe and affordable housing</b> .				#DIV/0!	#DIV/0!	
FNPI 4c The number of individuals who maintained safe and affordable housing for <b>90 days</b> .				#DIV/0!	#DIV/0!	
FNPI 4d The number of individuals who maintained safe and affordable housing for <b>180 days</b> .				#DIV/0!	#DIV/0!	
FNPI 4e The number of individuals who <b>avoided eviction</b> .				#DIV/0!	#DIV/0!	
FNPI 4f The number of individuals who <b>avoided foreclosure</b> .				#DIV/0!	#DIV/0!	
FNPI 4g The number of individuals who <b>experienced improved health and safety</b> due to improvements within their home (e.g. reduction or elimination of lead, radon, carbon monoxide and/or fire hazards or electrical issues, etc).				#DIV/0!	#DIV/0!	
FNPI 4h The number of individuals with <b>improved energy efficiency and/or energy burden reduction</b> in their homes.				#DIV/0!	#DIV/0!	

Other Housing Outcome Indicator (FNPI 4z)	I.) Number of Individuals Served in program(s) (#)	II.) Target (#)	III.) Actual Results (#)	IV.) Percentage Achieving Outcome [III/ I = IV ] (% auto calculated)	V.) Performance Target Accuracy (III/II = V) (% auto calculated)
FNPI 4z.1 The number of individuals _____.				#DIV/0!	#DIV/0!

**Comments:**

## Health and Social/Behavioral Development Indicators

Name of CSBG Eligible Entity Reporting:					
State:		UEI:			
Health and Social/Behavioral Development (FNPI 5)	I.) Number of Individuals Served in program(s) (#)	II.) Target (#)	III.) Actual Results (#)	IV.) Percentage Achieving Outcome [III/ I = IV ] (% auto calculated)	V.) Performance Target Accuracy (III/II = V) (% auto calculated)
FNPI 5a The number of individuals who demonstrated <b>increased nutrition skills</b> (e.g. cooking, shopping, and growing food).				#DIV/0!	#DIV/0!
FNPI 5b The number of individuals who demonstrated <b>improved physical health</b> and well-being.				#DIV/0!	#DIV/0!
FNPI 5c The number of individuals who demonstrated <b>improved mental and behavioral health and well-being</b> .				#DIV/0!	#DIV/0!
FNPI 5d The number of individuals who <b>improved skills</b> related to the adult role of parents/ caregivers.				#DIV/0!	#DIV/0!
FNPI 5e The number of parents/caregivers who <b>demonstrated increased sensitivity and responsiveness</b> in their interactions with their children.				#DIV/0!	#DIV/0!
FNPI 5f The number of <b>seniors (65+)</b> who maintained an independent living situation.				#DIV/0!	#DIV/0!
FNPI 5g The number of <b>individuals with disabilities</b> who maintained an independent living situation.				#DIV/0!	#DIV/0!
FNPI 5h The number of <b>individuals with a chronic illness</b> who maintained an independent living situation.				#DIV/0!	#DIV/0!
FNPI 5i The number of individuals with <b>no recidivating event</b> for six months.	0	0	0	#DIV/0!	#DIV/0!
FNPI 5i.1 Youth (ages 14-17)				#DIV/0!	#DIV/0!
FNPI 5i.2 Adults (ages 18+)				#DIV/0!	#DIV/0!

Other Health and Social/Behavioral Development Outcome Indicator (FNPI 5z)	I.) Number of Individuals Served in program(s) (#)	II.) Target (#)	III.) Actual Results (#)	IV.) Percentage Achieving Outcome [III/ I = IV ] (% auto calculated)	V.) Performance Target Accuracy (III/II = V) (% auto calculated)
FNPI 5z.1 The number of individuals _____.				#DIV/0!	#DIV/0!

Comments:

## Civic Engagement and Community Involvement Indicators

<b>Name of CSBG Eligible Entity Reporting:</b>					
<b>State:</b>	<b>UEI:</b>				
<b>Civic Engagement and Community Involvement Indicators (FNPI 6)</b>	<b>I.) Number of Individuals Served in program(s) (#)</b>	<b>II.) Target (#)</b>	<b>III.) Actual Results (#)</b>	<b>IV.) Percentage Achieving Outcome</b> [III/I = IV ] (% auto calculated)	<b>V.) Performance Target Accuracy</b> (III/II = V) (% auto calculated)
FNPI 6a The number of individuals who increased skills, knowledge, and abilities to enable them to work with Community Action to improve conditions in the community.				#DIV/0!	#DIV/0!
FNPI 6a.1 Of the above, the number of Community Action program participants who <b>improved their leadership skills.</b>				#DIV/0!	#DIV/0!
FNPI 6a.2 Of the above, the number of Community Action program participants who <b>improved their social networks.</b>				#DIV/0!	#DIV/0!
FNPI 6a.3 Of the above, the number of Community Action program participants who gained other skills, knowledge and abilities to <b>enhance their ability to engage.</b>				#DIV/0!	#DIV/0!

<b>Other Civic Engagement and Community Involvement Outcome Indicator (FNPI 6z)</b>	<b>I.) Number of Individuals Served in program(s) (#)</b>	<b>II.) Target (#)</b>	<b>III.) Actual Results (#)</b>	<b>IV.) Percentage Achieving Outcome</b> [III/I = IV ] (% auto calculated)	<b>V.) Performance Target Accuracy</b> (III/II = V) (% auto calculated)
FNPI 6z.1 The number of individuals _____.				#DIV/0!	#DIV/0!

**Comments:**

**Module 4, Section A: Individual and Family National Performance Indicators (FNPIs) - Data Entry Form**  
**Goal 1: Individuals and Families with low incomes are stable and achieve economic security.**  
**Outcomes Achieved Across One or More Domains**

Name of CSBG Eligible Entity Reporting:						
State:		UEI:				
Outcomes Across Multiple Domains (FNPI 7)		I.) Number of Individuals Served	II.) Target (#)	III.) Actual Results (#)	IV.) Percentage Achieving Outcome	V.) Performance Target Accuracy
		in program(s) (#)			[III/ I = IV ] (% auto calculated)	(III/II = V) (% auto calculated)
FNPI 7a The number of individuals who achieved one or more outcomes in the identified National Performance Indicators in one or more domains.					#DIV/0!	#DIV/0!

Other Outcome Indicator (FNPI 7z)	I.) Number of Individuals Served in program(s) (#)	II.) Target (#)	III.) Actual Results (#)	IV.) Percentage Achieving Outcome [III/ I = IV ] (% auto calculated) #DIV/0!	V.) Performance Target Accuracy (III/II = V) (% auto calculated) #DIV/0!
FNPI 7z.1 The number of individuals	.				

Comments:

### Employment Services

<b>Name of CSBG Eligible Entity Reporting:</b>	
<b>State:</b>	<b>UEI:</b>
<b>Employment Services (SRV 1)</b>	<b>Unduplicated Number of Individuals Served</b>
<b>Skills Training and Opportunities for Experience (SRV 1a-f)</b>	
SRV 1a Vocational Training	
SRV 1b On-the-Job and other Work Experience	
SRV 1c Youth Summer Work Placements	
SRV 1d Apprenticeship/Internship	
SRV 1e Self-Employment Skills Training	
SRV 1f Job Readiness Training	
<b>Career Counseling (SRV 1g-h)</b>	
SRV 1g Workshops	
SRV 1h Coaching	
<b>Job Search (SRV 1i-n)</b>	
SRV 1i Coaching	
SRV 1j Resume Development	
SRV 1k Interview Skills Training	
SRV 1l Job Referrals	
SRV 1m Job Placements	
SRV 1n Pre-employment physicals, background checks, etc.	
<b>Post Employment Supports (SRV 1o-p)</b>	
SRV 1o Coaching	
SRV 1p Interactions with employers	
<b>Employment Supplies (SRV 1q)</b>	
SRV 1q Employment Supplies	

### Education and Cognitive Development Services

<b>Name of CSBG Eligible Entity Reporting:</b>	
<b>State:</b>	<b>UEI:</b>
<b>Education and Cognitive Development Services (SRV 2)</b>	<b>Unduplicated Number of Individuals Served</b>
<b>Child/Young Adult Education Programs (SRV 2a-j)</b>	
SRV 2a Early Head Start	
SRV 2b Head Start	
SRV 2c Other Early-Childhood (0-5 yr. old) Education	
SRV 2d K-12 Education	
SRV 2e K-12 Support Services	
SRV 2f Financial Literacy Education	
SRV 2g Literacy/English Language Education	
SRV 2h College-Readiness Preparation/Support	
SRV 2i Other Post Secondary Preparation	
SRV 2j Other Post Secondary Support	
<b>School Supplies (SRV 2k)</b>	
SRV 2k School Supplies	
<b>Extra-curricular Programs (SRV 2l-q)</b>	
SRV 2l Before and After School Activities	
SRV 2m Summer Youth Recreational Activities	
SRV 2n Summer Education Programs	
SRV 2o Behavior Improvement Programs (attitude, self-esteem, Dress-for-Success, etc.)	
SRV 2p Mentoring	
SRV 2q Leadership Training	
<b>Adult Education Programs (SRV 2r-z)</b>	
SRV 2r Adult Literacy Classes	
SRV 2s English Language Classes	
SRV 2t Basic Education Classes	
SRV 2u High School Equivalency Classes	
SRV 2v Leadership Training	
SRV 2w Parenting Supports (may be a part of the early childhood programs identified above)	
SRV 2x Applied Technology Classes	
SRV 2y Post-Secondary Education Preparation	
SRV 2z Financial Literacy Education	
<b>Post-Secondary Education Supports (SRV 2aa)</b>	
SRV 2aa College applications, text books, computers, etc.	
<b>Financial Aid Assistance (SRV 2bb)</b>	
SRV 2bb Scholarships	
<b>Home Visits (SVR 2cc)</b>	
SRV 2cc Home Visits	

### Income and Asset Building Services

<b>Name of CSBG Eligible Entity Reporting:</b>	
<b>State:</b>	<b>UEI:</b>
<b>Income and Asset Building Services (SRV 3)</b>	<b>Unduplicated Number of Individuals Served</b>
<b>Training and Counseling Services (SRV 3a-f)</b>	
SRV 3a Financial Capability Skills Training	
SRV 3b Financial Coaching/Counseling	
SRV 3c Financial Management Programs (including budgeting, credit management, credit repair, credit counseling, etc.)	
SRV 3d First-time Homebuyer Counseling	
SRV 3e Foreclosure Prevention Counseling	
SRV 3f Small Business Start-Up and Development Counseling Sessions/Classes	
<b>Benefit Coordination and Advocacy (SRV 3g-l)</b>	
SRV 3g Child Support Payments	
SRV 3h Health Insurance	
SRV 3i Social Security/SSI Payments	
SRV 3j Veteran's Benefits	
SRV 3k TANF Benefits	
SRV 3l SNAP Benefits	
<b>Asset Building (SRV 3m-o)</b>	
SRV 3m Saving Accounts/IDAs and other asset building accounts	
SRV 3n Other financial products (IRA accounts, MyRA, other retirement accounts, etc.)	
SRV 3o VITA, EITC, or Other Tax Preparation programs	
<b>SRV 3p Loans And Grants (SRV 3p-q)</b>	
SRV 3p Micro-loans	
SRV 3q Business incubator/business development loans	

## Housing Services

<b>Name of CSBG Eligible Entity Reporting:</b>	
<b>State:</b>	<b>UEI:</b>
<b>Housing Services (SRV 4)</b>	<b>Unduplicated Number of Individuals Served</b>
<b>Housing Payment Assistance (SRV 4a-e)</b>	
SRV 4a Financial Capability Skill Training	
SRV 4b Financial Coaching/Counseling	
SRV 4c Rent Payments (includes Emergency Rent Payments)	
SRV 4d Deposit Payments	
SRV 4e Mortgage Payments (includes Emergency Mortgage Payments)	
<b>Eviction Prevention Services (SRV 4f-h)</b>	
SRV 4f Eviction Counseling	
SRV 4g Landlord/Tenant Mediations	
SRV 4h Landlord/Tenant Rights Education	
<b>Utility Payment Assistance (SRV 4i-l)</b>	
SRV 4i Utility Payments (LIHEAP-includes Emergency Utility Payments)	
SRV 4j Utility Deposits	
SRV 4k Utility Arrears Payments	
SRV 4l Level Billing Assistance	
<b>Housing Placement/Rapid Re-housing (SRV 4m-p)</b>	
SRV 4m Temporary Housing Placement (includes Emergency Shelters)	
SRV 4n Transitional Housing Placements	
SRV 4o Permanent Housing Placements	
SRV 4p Rental Counseling	
<b>Housing Maintenance &amp; Improvements (SRV 4q)</b>	
SRV 4q Home Repairs (e.g. structural, appliance, heating systems. etc.) (Including Emergency Home Repairs)	
<b>Weatherization Services (SRV 4r-t)</b>	
SRV 4r Independent-living Home Improvements (e.g. ramps, tub and shower grab bars, handicap accessible modifications, etc.)	
SRV 4s Healthy Homes Services(e.g. reduction or elimination of lead, radon, carbon monoxide and/or fire hazards or electrical issues, etc.)	
SRV 4t Energy Efficiency Improvements (e.g. insullation, air sealing, furnace repair, etc.)	



<b>Name of CSBG Eligible Entity Reporting:</b>	
<b>State:</b>	<b>UEI:</b>
<b>Health and Social/Behavioral Development Services (SRV 5)</b>	<b>Unduplicated Number of Individuals Served</b>
<b>Health Services, Screening and Assessments (SRV 5a-j)</b>	
SRV 5a Immunizations	
SRV 5b Physicals	
SRV 5c Developmental Delay Screening	
SRV 5d Vision Screening	
SRV 5e Prescription Payments	
SRV 5f Doctor Visit Payments	
SRV 5g Maternal/Child Health	
SRV 5h Nursing Care Sessions	
SRV 5i In-Home Affordable Seniors/Disabled Care Sessions (Nursing, Chores, Personal Care Services)	
SRV 5j Health Insurance Options Counseling	
<b>Reproductive Health Services (SRV 5k-o)</b>	
SRV 5k Coaching Sessions	
SRV 5l Family Planning Classes	
SRV 5m Contraceptives	
SRV 5n STI/HIV Prevention Counseling Sessions	
SRV 5o STI/HIV Screenings	
<b>Wellness Education (SRV 5p-q)</b>	
SRV 5p Wellness Classes (stress reduction, medication management, mindfulness, etc.)	
SRV 5q Exercise/Fitness	
<b>Mental/Behavioral Health (SRV 5r-x)</b>	
SRV 5r Detoxification Sessions	
SRV 5s Substance Abuse Screenings	
SRV 5t Substance Abuse Counseling	
SRV 5u Mental Health Assessments	
SRV 5v Mental Health Counseling	
SRV 5w Crisis Response/Call-In Responses	
SRV 5x Domestic Violence Programs	
<b>Support Groups (SRV 5y-aa)</b>	
SRV 5y Substance Abuse Support Group Meetings	
SRV 5z Domestic Violence Support Group Meetings	
SRV 5aa Mental Health Support Group Meeting	

<b>Name of CSBG Eligible Entity Reporting:</b>	
<b>State:</b>	<b>UEI:</b>
<b>Health and Social/Behavioral Development Services (Cont'd.)</b>	<b>Unduplicated Number of Individuals Served</b>
<b>Dental Services, Screenings and Exams (SRV 5bb-ee)</b>	
SRV 5bb Adult Dental Screening/Exams	
SRV 5cc Adult Dental Services (including Emergency Dental Procedures)	
SRV 5dd Child Dental Screenings/Exams	
SRV 5ee Child Dental Services (including Emergency Dental Procedures)	
<b>Nutrition and Food/Meals (SRV 5ff-jj)</b>	
SRV 5ff Skills Classes (Gardening, Cooking, Nutrition)	
SRV 5gg Community Gardening Activities	
SRV 5hh Incentives (e.g. gift card for food preparation, rewards for participation, etc.)	
SRV 5ii Prepared Meals	
SRV 5jj Food Distribution (Food Bags/Boxes, Food Share Program, Bags of Groceries)	
<b>Family Skills Development (SRV 5kk-mm)</b>	
SRV 5kk Family Mentoring Sessions	
SRV 5ll Life Skills Coaching Sessions	
SRV 5mm Parenting Classes	
<b>Emergency Hygiene Assistance (SRV 5nn-oo)</b>	
SRV 5nn Kits/boxes	
SRV 5oo Hygiene Facility Utilizations (e.g. showers, toilets, sinks)	

### Civic Engagement and Community Involvement

<b>Name of CSBG Eligible Entity Reporting:</b>	
<b>State:</b>	<b>UEI:</b>
<b>Civic Engagement and Community Involvement Services (SRV 6a-f)</b>	<b>Unduplicated Number of Individuals Served</b>
SRV 6a Voter Education and Access	
SRV 6b Leadership Training	
SRV 6c Tri-partite Board Membership	
SRV 6d Citizenship Classes	
SRV 6e Getting Ahead Classes	
SRV 6f Volunteer Training	

### Services Supporting Multiple Domains

<b>Name of CSBG Eligible Entity Reporting:</b>	
<b>State:</b>	<b>UEI:</b>
<b>Services Supporting Multiple Domains (SRV 7)</b>	<b>Unduplicated Number of Individuals Served</b>
<b>Case Management (SRV 7a)</b>	
SRV 7a Case Management	
<b>Eligibility Determinations (SRV 7b)</b>	
SRV 7b Eligibility Determinations	
<b>Referrals (SRV 7c)</b>	
SRV 7c Referrals	
<b>Transportation Services (SRV 7d)</b>	
SRV 7d Transportation Services (e.g. bus passes, bus transport, support for auto purchase or repair; including emergency services)	
<b>Childcare (SRV 7e-f)</b>	
SRV 7e Child Care subsidies	
SRV 7f Child Care payments	
<b>Eldercare (SRV 7g)</b>	
SRV 7g Day Centers	
<b>Identification Documents (SRV 7h-j)</b>	
SRV 7h Birth Certificate	
SRV 7i Social Security Card	
SRV 7j Driver's License	
<b>Re-Entry Services (SRV 7k)</b>	
SRV 7k Criminal Record Expungements	
<b>Immigration Support Services (SRV 7l)</b>	
SRV 7l Immigration Support Services (relocation, food, clothing)	
<b>Legal Assistance (includes emergency legal assistance) (SRV 7m)</b>	
SRV 7m Legal Assistance	
<b>Emergency Clothing Assistance (SRV 7n)</b>	
SRV 7n Emergency Clothing Assistance	
<b>Mediation/Customer Advocacy Interventions (debt forgiveness, negotiations or issues with landlords, coordinating with other services or government) (SRV 7o)</b>	
SRV 7o Mediation/Customer Advocacy Interventions	

**Module 4, Section C: All Characteristics Report - Data Entry Form**  
**Goal 1: Individuals and Families with low-incomes are stable and achieve economic security.**

A. Total unduplicated number of all INDIVIDUALS about whom one or more characteristics were obtained:  
 B. Total unduplicated number of all HOUSEHOLDS about whom one or more characteristics were obtained:


**C. INDIVIDUAL LEVEL CHARACTERISTICS**

1. Gender	Number of Individuals
a. Male	
b. Female	
c. Other	
d. Unknown/not reported	
e. TOTAL (auto calculated)	0

2. Age	Number of Individuals
a. 0-5	
b. 6-13	
c. 14-17	
d. 18-24	
e. 25-44	
f. 45-54	
g. 55-59	
h. 60-64	
i. 65-74	
j. 75+	
k. Unknown/not reported	
l. TOTAL (auto calculated)	0

3. Education Levels	Number of Individuals	
	[ages 14-24]	[ages 25+]
a. Grades 0-8		
b. Grades 9-12/Non-Graduate		
c. High School Graduate		
d. GED/Equivalency Diploma		
e. 12 grade + Some Post-Secondary		
f. 2 or 4 years College Graduate		
g. Graduate of other post-secondary school		
h. Unknown/not reported		
i. TOTAL (auto calculated)		

4. Disconnected Youth	Number of Individuals
a. Youth ages 14-24 who are neither working or in school	

5. Health	Number of Individuals		
	Yes	No	Unknown
a. Disabling Condition			
b. Health Insurance*			

\*If an individual reported that they had Health Insurance please identify the source of health insurance below.

**Health Insurance Sources**

c.1. Medicaid	
c.2. Medicare	
c.3. State Children's Health Insurance Program	
c.4. State Health Insurance for Adults	
c.5. Military Health Care	
c.6. Direct-Purchase	
c.7. Employment Based	
c.8. Unknown/not reported	
c.9. TOTAL (auto calculated)	0

6. Ethnicity/Race	Number of Individuals
<b>a. Ethnicity</b>	
a.1. Hispanic, Latino or Spanish Origins	
a.2. Not Hispanic, Latino or Spanish Origins	
a.3. Unknown/not reported	
a.4. TOTAL (auto calculated)	0

<b>b. Race</b>	
b.1. American Indian or Alaska Native	
b.2. Asian	
b.3. Black or African American	
b.4. Native Hawaiian and Other Pacific Islander	
b.5. White	
b.6. Other	
b.7. Multi-race (two or more of the above)	
b.8. Unknown/not reported	
b.9. TOTAL (auto calculated)	0

7. Military Status	Number of Individuals
a. Veteran	
b. Active Military	
c. Never Served in the Military	
d. Unknown/not reported	
e. TOTAL (auto calculated)	0

8. Work Status (Individuals 18+)	Number of Individuals
a. Employed Full-Time	
b. Employed Part-Time	
c. Migrant or Seasonal Farm Worker	
d. Unemployed (Short-Term, 6 months or less)	
e. Unemployed (Long-Term, more than 6 months)	
f. Unemployed (Not in Labor Force)	
g. Retired	
h. Unknown/not reported	
i. TOTAL (auto calculated)	0

**Goal 1: Individuals and Families with low-incomes are stable and achieve economic security.**

9. Household Type	Number of Households
a. Single Person	
b. Two Adults NO Children	
c. Single Parent Female	
d. Single Parent Male	
e. Two Parent Household	
f. Non-related Adults with Children	
g. Multigenerational Household	
h. Other	
i. Unknown/not reported	
<b>j. TOTAL (auto calculated)</b>	<b>0</b>

11. Housing	Number of Households
a. Own	
b. Rent	
c. Other permanent housing	
d. Homeless	
e. Other	
f. Unknown/not reported	
<b>g. TOTAL (auto calculated)</b>	<b>0</b>

13. Sources of Household Income	Number of Households
a. Income from Employment Only	
b. Income from Employment and Other Income Source	
c. Income from Employment, Other Income Source, and Non-Cash Benefits	
d. Income from Employment and Non-Cash Benefits	
e. Other Income Source Only	
f. Other Income Source and Non-Cash Benefits	
g. No Income	
h. Non-Cash Benefits Only	
i. Unknown/not reported	
<b>j. TOTAL (auto calculated)</b>	<b>0</b>

14. Other Income Source	Number of Households
a. TANF	
b. Supplemental Security Income (SSI)	
c. Social Security Disability Income (SSDI)	
d. VA Service-Connected Disability Compensation	
e. VA Non-Service Connected Disability Pension	
f. Private Disability Insurance	
g. Worker's Compensation	
h. Retirement Income from Social Security	
i. Pension	
j. Child Support	
k. Alimony or other Spousal Support	
l. Unemployment Insurance	
m. EITC	
n. Other	
o. Unknown/not reported	

15. Non-Cash Benefits	Number of Households
a. SNAP	
b. WIC	
c. LIHEAP	
d. Housing Choice Voucher	
e. Public Housing	
f. Permanent Supportive Housing	
g. HUD-VASH	
h. Childcare Voucher	
i. Affordable Care Act Subsidy	
j. Other	
k. Unknown/not reported	

a. Please list the unduplicated number of INDIVIDUALS served in each program\*:

[illegible]

**Module 4, Section C: All Characteristics Report - Data Entry Form**  
**Goal 1: Individuals and Families with low-incomes are stable and achieve economic security.**

<b>Name of CSBG Eligible Entity Reporting:</b>																						
<b>State:</b>	<b>UEI:</b>																					
<p><b>F. Number of Households Who May or May Not be Included in the Totals Above</b> <i>(due to data collection system integration barriers)</i></p> <p>a. Please list the unduplicated number of HOUSEHOLDS served in each program*:</p> <table border="1" style="float: right; margin-top: 10px;"> <thead> <tr style="background-color: #cccccc;"> <th style="width: 40%;">Program Name</th> <th style="width: 60%;">Number of Households</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table> <p style="clear: both; margin-top: 20px; font-size: small;">*The system will add rows to allow reporting on multiple programs.</p>			Program Name	Number of Households																		
Program Name	Number of Households																					



## **COMMUNITY SERVICE BLOCK GRANTS (CSBG) POLICIES AND PROCEDURES**

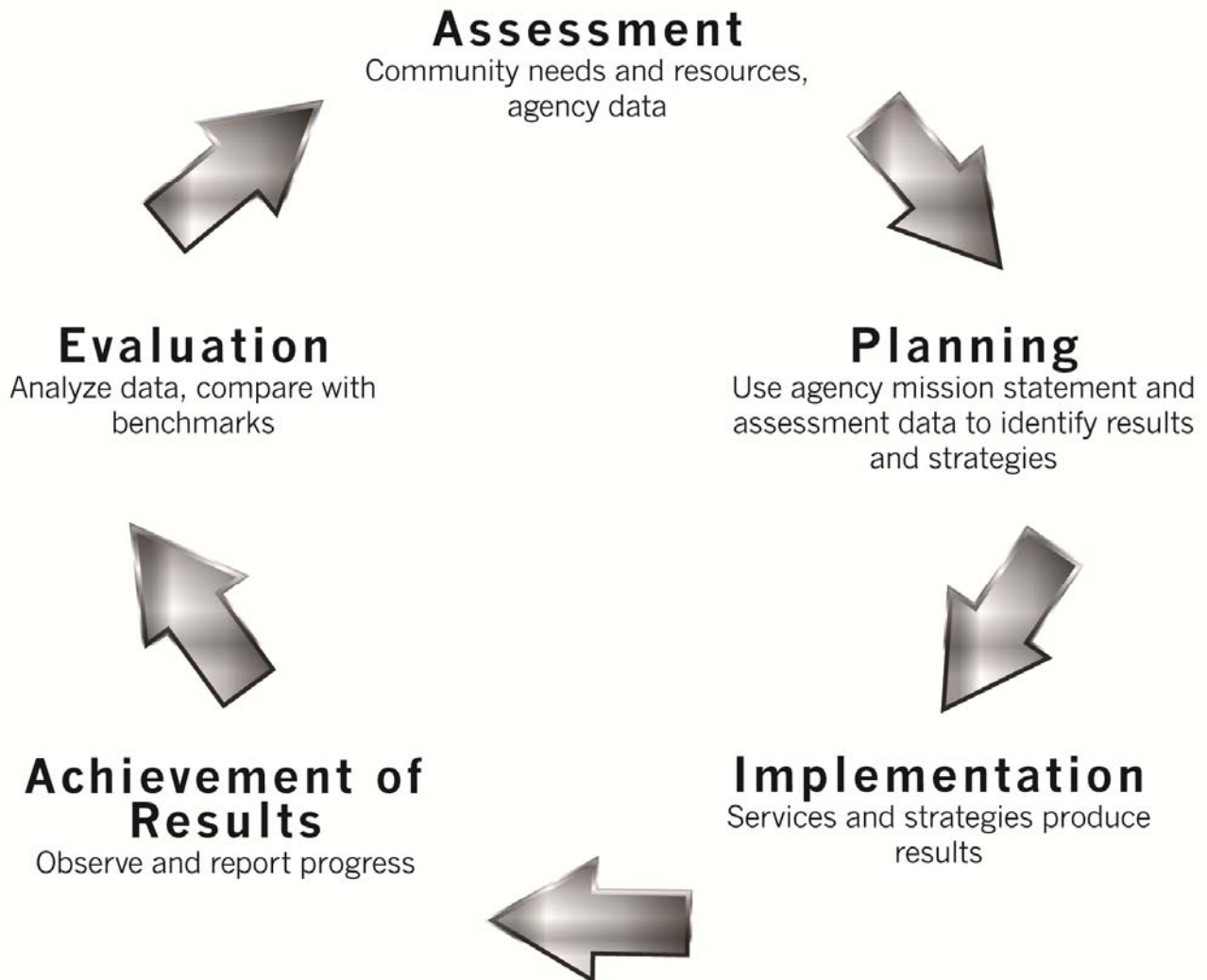
### **Appendix 9**

### **ROMA Cycle**

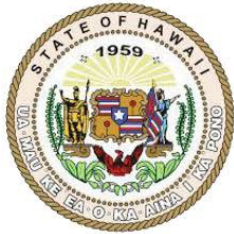


# The Results Oriented Management and Accountability Cycle

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*The ROMA Cycle graphic was developed by the National Peer to Peer (NPtP) ROMA Training Project, based on guidance regarding Core Activities for States and CSBG Eligible Entities provided by OCS Information Memo 49. From Planning for Results © 2006, J. Jakopic and B. Mooney, Community Action Association of PA. Curriculum developed with funding from the US Department of Health and Human Services – Office of Community. Use is permitted with this footer. All other rights reserved.*



## **COMMUNITY SERVICE BLOCK GRANTS (CSBG) POLICIES AND PROCEDURES**

### **Appendix 10**

#### **Information Memorandum 138 (Organizational Standards)**

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## **COMMUNITY SERVICES BLOCK GRANT**

### **Information Memorandum**

U.S. Department of Health and Human Services  
Administration for Children and Families  
Office of Community Services  
Division of State Assistance  
370 L'Enfant Promenade, S.W.  
Washington, D.C. 20447

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**Transmittal No. 138**

**Date: January 26, 2015**

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**TO:** State Community Services Block Grant (CSBG) Administrators, U. S. Territory CSBG Administrators, Eligible Entities, and State Community Action Associations

**SUBJECT:** State Establishment of Organizational Standards for CSBG Eligible Entities under 678B of the CSBG Act, 42 U.S.C. § 9914

**RELATED REFERENCES:** Community Services Block Grant Act 42 U.S.C. § 9901 *et seq.*, hereafter referred to as “the CSBG Act.”

This information memorandum (IM) provides guidance and describes State and Federal roles and responsibilities for the establishment of organizational standards as a component of a larger performance management and accountability system for CSBG. Consistent with the authority and responsibilities the CSBG Act establishes for the Federal office and States, OCS is requiring States, no later than FY 2016, to establish and report on their organizational standards for CSBG eligible entities as part of an enhanced system for accountability and performance management across the CSBG Network.

While States have discretion on the set of standards they may use, OCS recommends States use the organizational standards (Appendices 2 and 3) developed by the OCS-supported CSBG Organizational Standards Center of Excellence (COE), which reflect the requirements of the CSBG Act, good management practices, and the values of Community Action. These standards will ensure CSBG eligible entities have appropriate organizational capacity to deliver services to low-income individuals and communities.

The guidance in this IM applies to States, the District of Columbia, and U.S. Territories that support CSBG eligible entities. Tribal governments and organizations that receive CSBG directly from the Federal government are not included in this guidance, but will receive future guidance on a separate accountability and reporting process.

### **State Authority and Responsibility to Establish Organizational Standards**

Under the block grant framework established in the CSBG Act, States have both the authority and the responsibility for effective oversight of eligible entities that receive CSBG funds. Section 678B of the CSBG Act (42 U.S.C. § 9914) requires State CSBG Lead Agencies to establish “performance goals, administrative standards, financial management requirements, and other requirements” that ensure an appropriate level of accountability and quality among the State’s eligible entities. In order for States to meet these responsibilities under the CSBG Act,

States must establish and communicate clear and comprehensive standards and hold eligible entities accountable according to the standards as part of their oversight duties.

### **Federal Authority and Responsibility for Organizational Standards**

As the Federal office responsible for oversight of CSBG, the Office of Community Services (OCS) is responsible for monitoring to assure State compliance with the requirements of the CSBG Act and for providing training and technical assistance to help States carry out the requirements of the CSBG Act. Section 678B(c) (42 U.S.C. § 9914(c)) directs the U.S. Department of Health and Human Services (HHS) to conduct evaluations of the use of CSBG funds received by the States. Section 678A(a) (42 U.S.C. 9913(a)) requires HHS to support training and technical assistance activities to assist States in monitoring activities to correct programmatic deficiencies of eligible entities, and for reporting and data collection activities.

Several sections of the CSBG Act provide authority or require OCS to collect information from States as part of the State plan or annual report regarding how the State will meet requirements of the CSBG Act. Section 676(b) (42 U.S.C. § 9908(b)) outlines authority for the collection of necessary information as part of a State application and plan. The statute provides the authority to collect “such information as the Secretary shall require,” including a series of detailed assurances based on the requirements of the CSBG Act. To assure effective use of funds to meet the purposes of the statute, section 676(d) (42 U.S.C. § 9908(d)) states that the “Secretary may prescribe procedures for the purpose of assessing effectiveness of the eligible entities in carrying out the purpose of [the CSBG Act].”

### **Performance Management for CSBG**

Budget constraints, high poverty levels, changing demographics, and income inequality demand that the CSBG Network remain vigilant in our shared mission of creating opportunity and security for all Americans. We must look at all levels of the CSBG Network – local, State, and Federal – to assess and increase CSBG’s impact. The CSBG Network is far-reaching and nationwide. Together, we have the potential to achieve even greater results, in every community, by improving our accountability to one another, our customers, and our communities.

In an effort to help the CSBG Network increase accountability and achieve results, OCS launched several initiatives in 2012. One focused on establishing organizational standards for eligible entities. Under this effort, CSBG Network leaders developed and recommended a set of organizational standards to strengthen the capacity of the more than 1,000 eligible entities providing services across the country.

A second performance management initiative focused on enhancing the CSBG Network’s performance and outcomes measurement system for local eligible entities – identified in the CSBG Act as Results Oriented Management and Accountability System (ROMA). Finally, a third initiative focused on creating State and Federal-level accountability measures to track and measure organizational performance by State CSBG Lead Agencies and OCS.

These three efforts are complementary and integrated; together they comprise a network-wide accountability and management system for CSBG. They will ensure eligible entities, States, and OCS operate within Federal law and regulation and will build accountability and continuous management improvement into all three levels of the network (local, State and Federal). As shown in Appendix 1, *Measuring the Success of Community Action and CSBG*, these efforts will help us answer the questions, ‘How well did the Network perform?’ and ‘What difference did the Network make?’ Ultimately, using these new and enhanced tools and information, the CSBG Network will make better program decisions and generate stronger results for low-income families and communities.

### **Organizational Standards for CSBG Eligible Entities - Background**

In 2012, OCS funded a cooperative agreement for the CSBG Organizational Standards Center of Excellence (COE). The two-year cooperative agreement coordinated – with input from local, State, and national partners – the development and dissemination of a set of organizational standards for eligible entities for the purpose of ensuring that all CSBG eligible entities have the capacity to provide high-quality services to low-income individuals and communities.

To begin the project, the COE expanded an existing CSBG Working Group from its original 20 members to over 50 individuals. The expanded working group included a balanced representation from eligible entities, State CSBG Lead Agencies, Community Action State Associations, national partners, technical assistance providers, and external content experts.

The working group’s first task was a thorough environmental scan and analysis of existing organizational oversight tools and resources, internal and external to the CSBG Network. The group found that while there are many similarities across States in how State CSBG Lead Agencies monitor eligible entities, substantial differences also exist.

The project continued through a nine-month development process that provided numerous opportunities for input by the CSBG Network, including financial and legal experts, on draft organizational standards. All together, the network invested over 3,500 documented hours in Working Group and committee meetings and in national and regional listening sessions. The final phase included a pilot that engaged a subset of State CSBG Lead Agencies and eligible entities in a field test of draft organizational standards and tools.

In March, 2014, OCS published a draft information memorandum with the draft organizational standards. OCS received 29 sets of comments (approximately 160 individual comments) from a broad range of individuals and organizations, including six CAAs; 12 states; five state associations; and six national organizations and individuals, and integrated all of this feedback into the final set of organizational standards.

The final result of the COE and OCS efforts is a comprehensive set of organizational standards developed by the CSBG Network for the CSBG Network. The CSBG Network is to be commended for its commitment to ongoing performance improvement and strengthening accountability.

## The COE-developed Organizational Standards

The COE-developed standards are organized in three thematic groups comprising nine categories and totals of 58 standards for private, nonprofit eligible entities and 50 for public entities.

1. Maximum Feasible Participation
  - Consumer Input and Involvement
  - Community Engagement
  - Community Assessment
2. Vision and Direction
  - Organizational Leadership
  - Board Governance
  - Strategic Planning
3. Operations and Accountability
  - Human Resource Management
  - Financial Operations and Oversight
  - Data and Analysis

In order to be widely applicable across the CSBG Network, the standards are defined differently for private and public eligible entities. The complete description and list of private and public organizational standards are attached as Appendices 2 and 3, respectively.

All of the COE-developed organizational standards work together to characterize an effective and healthy organization. Some of the standards have direct links to the CSBG Act, such as the standards on the tripartite board structure and the democratic selection process. Some standards link with U.S. Office of Management and Budget (OMB) guidance, such as the standards on audits. As a whole, the standards reflect many of the requirements of the CSBG Act, applicable Federal laws and regulations, good management practices, and the values of Community Action.

The purpose of the organizational standards is to ensure that all eligible entities have appropriate organizational capacity, not only in the critical financial and administrative areas important to all nonprofit and public human service agencies, but also in areas of unique importance for CSBG-funded eligible entities. To fulfill the promise of the standards, States must provide consistent and high-quality oversight and technical assistance related to organizational standards. In addition, based on information about organizational capacity, States must work with the eligible entities to make informed programmatic decisions about how the agencies can best meet the needs of local low-income families and communities.

States and eligible entities that implement the COE standards will benefit from COE-developed tools, training, and technical assistance, and from the collective wisdom and scale of having many States using common standards (detailed tools and materials on the standards are available on the COE web page on the [Community Action Partnership](#) website). States using the COE standards will also benefit from a streamlined State plan process.

## State Oversight

Section 678B of the CSBG Act (42 U.S.C. § 9914) requires State CSBG Lead Agencies to establish “performance goals, administrative standards, financial management requirements, and other requirements” that ensure an appropriate level of accountability and quality among the State’s eligible entities. The purpose of States using the organizational standards is to ensure each eligible entity has appropriate organizational capacity to fulfill the purposes of the CSBG Act. As noted below, States have discretion to determine how organizational standards will be implemented as part of their overall oversight strategy.

### *Assessment of Standards*

Once the expectations for organizational standards are established and communicated to the eligible entities across a State, the State CSBG Lead Agency is responsible for assessing the status of standards among all of the eligible entities annually and for reporting to OCS on the standards in the CSBG Annual Report. States may design an approach for assessing organizational standards that fits within the oversight framework in their State. Many States may integrate standards assessment into their regular CSBG monitoring procedures, while other States may choose different oversight approaches, such as peer-review, assessment by a consultant or third party, or self-assessment. Some States may also choose a hybrid approach involving two or more strategies. Regardless of the approach, States must ensure the assessment of standards is independently verified by the State or a third party.

For example, a State on a triennial monitoring cycle may decide to assess the standards as part of their full onsite financial, administrative, and programmatic monitoring protocol. In the years between monitoring visits, the State may require entities to do self-assessments that are independently verified by a third party. In another example, a State may develop a process that includes peer review assessment that is then verified annually during regular State monitoring visits or a State desk review process.

States will describe their approach for assessing standards in their State plans, which will be subject to OCS review. Promising practices and other tools on integrating such assessment into a State’s oversight strategy will be available on the COE web page on the [Community Action Partnership](#) website.

States are responsible for ensuring that the eligible entities meet all State-established organizational standards. Some standards (i.e., strategic planning, developing an agency-wide budget, etc.) may take several years for eligible entities to meet, but every entity must make steady progress toward the goal of meeting all standards.

### *Corrective Action*

During the assessment process, if a State finds an eligible entity is not meeting a standard or set of standards, the State’s response will depend on the circumstances. In cases where the eligible entity may be able to meet the standard in a reasonable time frame contingent on some targeted technical assistance, the State and entity may develop a technical assistance plan to target



training and technical assistance resources and outline a time frame for the entity to meet the standard(s). If appropriate in other situations, the State may initiate action in accordance with section 678C of the CSBG Act (42 U.S.C. § 9915), including the establishment of a Quality Improvement Plan (QIP) with clear timelines and benchmarks for progress.

As long as the State is confident that the eligible entity is moving toward meeting standards, under a technical assistance plan, QIP, or other oversight mechanism, the State should not initiate action to terminate or reduce funding.

The failure of an eligible entity to meet multiple standards may reflect deeper organizational challenges and risk. In those cases, a State must determine whether it may be necessary to take additional actions, including reducing or terminating funding, in accordance with [CSBG IM 116](#) (*Corrective Action, Termination, or Reduction of Funding*), issued May 1, 2012. OCS and States do not have the authority under the CSBG Act to bypass the process described in CSBG IM 116 in order to re-compete CSBG funding based on failure to meet organizational standards.

### **Implementation of Organizational Standards**

The roll-out of organizational standards for eligible entities is a significant development in the history of CSBG and marks a new phase in our ability to strengthen accountability and results. While we expect States to move expeditiously in integrating organizational standards into their plans in FY 2016, we also recognize that States must manage this process thoughtfully so as to minimize unintended impact on their operations and those of the eligible entities.

#### *State Considerations for an Effective Roll-out Process*

As States establish new organizational standards for their eligible entities, they must follow a process that is consistent with State rules and is as fair and reasonable as possible. States should allow for input from the boards and leadership of eligible entities on the timing and procedures for implementing, documenting, and reporting on the standards. States should consistently integrate the organizational standards in State CSBG plans, contracts with eligible entities, funding documents, and oversight and monitoring instruments and reports. In particular, States should clearly communicate expectations around organizational standards prior to State oversight and monitoring activities. Once established, a State should only modify organizational standards based on established State rules and procedures that are publicly communicated and transparent (see Appendix 4: State Implementation of Organizational Standards – Key Considerations).

#### *Process and Timing for Planning and Roll-out*

States are expected to use organizational standards for assessing eligible entities starting in FY 2016. In order to do this, States must include information about organizational standards in their FY 2016 application and State plan, due September 1, 2015.

OCS encourages States to start planning for this process now, in FY 2015, particularly if State procedures for establishing official organizational standards may require a lengthy implementation period. For example, if a State uses regulation to establish official CSBG policy



for the eligible entities, the State may want to begin that process in advance of the FY 2016 CSBG application cycle. The timelines for any necessary rulemaking, including any potential obstacles that would prevent full implementation by FY 2016, must be described in the State plan. OCS will work with States that may need additional time due to rulemaking issues.

Any State that submitted a two-year plan for FY 2015 (due September 1, 2014) that did not include organizational standards for FY 2016 will have to submit a supplemental application for FY 2016 that includes organizational standards. This submission will be incorporated into the process for the FY 2016 submission of the State's 424-M application, which States must submit annually online in order to receive CSBG funding.

### *CSBG Model State Plan and Annual Report*

The CSBG Model State Plan and CSBG Annual Report are interconnected and work together to provide critical information to OCS, Congress, and other stakeholders. The CSBG Model State Plan establishes the plans and goals for the performance period, and the annual report cycle provides information on the State's progress toward fulfilling those goals. OCS envisions the Model State Plan to work together with the annual report to provide critical performance management information – including that of organizational standards – to be used by all three levels of the CSBG Network.

In accordance with authorities outlined in Section 676(b) of the CSBG Act (42 U.S.C. § 9908(b)), OCS is revising the Model State Plan for the FY 2016 application cycle (for applications due September 1, 2015) to incorporate items related to organizational standards. OCS will review these elements during the usual State plan review process. Because the COE standards are designed as a comprehensive and complete set, any State that proposes making a minor modification to the standards must document the rationale for the change in their State plan and reports; and any modification to the COE standards will be subject to OCS review.

The revised Model State Plan will require the State to describe:

- whether the State is using the COE-developed organizational standards (and any modifications, if applicable);
- alternative organizational standards, if applicable;
- the process for establishing organizational standards officially in the State (e.g., through State regulation, contract terms and conditions, or other official policy documents), including a timeline;
- the approach for assessing eligible entities against standards;
- procedures for corrective action activities based on organizational standards; and
- exceptions for limited purpose or very small eligible entities, if applicable.

States will report on the status of eligible entities based on organizational standards through the required CSBG Annual Report. In past years, States may have fulfilled their annual reporting requirements, under section 678E(a)(2) of the CSBG Act (42 U.S.C. § 9917(a)(2)), by providing data for the CSBG Information Survey. In the future, OCS will provide new instructions for States regarding annual reporting.

OCS will be revising the Annual Report forms to include information on organizational standards, such as a comparison of the State's actual activities and performance on organizational standards to the planned activities and performance in the State plan. The Annual Report forms will also include data on the new State CSBG Accountability Measures.

### *Alternative Organizational Standards*

Some States may already have highly developed standards in place that may function well in fulfillment of State oversight requirements under the CSBG Act. In these cases, a State may establish and communicate organizational standards for its eligible entities that are different from the COE-developed standards.

However, a State that uses an alternative set of standards must demonstrate that the standards are at least as rigorous and comprehensive as the organizational standards developed by the COE. If a State establishes a different set of organizational standards, the alternative standards must encompass requirements of the CSBG Act and other Federal requirements, such as those found in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 C.F.R. Part 200), and should address the nine categories listed in the description of the COE-developed standards (e.g., consumer input and involvement, community engagement, etc.). OCS will review alternative standards during the application and State plan review process.

### *Exceptions for Limited-purpose Agencies and Special Circumstances*

While the COE-developed organizational standards and related tools and materials are applicable to the vast majority of public and private CSBG eligible entities across the network, OCS recognizes that some States, according to their historical CSBG structure or other factors, may provide CSBG funds to certain entities for which the organizational standards may not be appropriate. These entities may include limited purpose agencies, State-funded tribal organizations, and migrant and seasonal farmworker organizations. In addition, organizational standards may not be applicable to entities with very small overall budgets (e.g., under \$50,000) or entities that receive very minor CSBG allocations (e.g., \$15,000).

In these special circumstances, States should assess both the applicability of the standards and the administrative burden for very small entities. States should also assess whether these agencies that are unable to meet the organizational standards are otherwise equipped to meet the purposes and goals of the CSBG Act, and whether alternative approaches, such as shared administrative supports or mergers, should be considered in order to assure appropriate capacity.

States may describe the rationale for not implementing the COE-developed or alternative organizational standards for these specific entities in their State plan, which will be subject to OCS review. However, as appropriate, States should describe other types of appropriate standards for excepted entities in order to ensure performance and accountability appropriate to the specific purpose and scope of the Federal support.

### *State Accountability Measures on Organizational Standards*

States will report on organizational standards in part by using the new CSBG State Accountability Measures. These new accountability measures will require States to track data such as the percentage of eligible entities that met 100 percent of the organizational standards during the performance period and information on technical assistance plans and Quality Improvement Plans for eligible entities not meeting the standards during the performance period.

OCS is incorporating the State Accountability Measures into the CSBG Model State Plan and CSBG Annual Report forms and will clear them through the U.S. Office of Management and Budget (OMB). For more information on the CSBG State and Federal Accountability Measures, including the specific measures related to organizational standards, see the draft IM, *State and Federal Accountability Measures and Data Collection Modernization*.

### *CSBG Network Review and OMB Paperwork Reduction Act Clearance Process*

As noted earlier, OCS is currently revising the Model State Plan and the CSBG Annual Report forms to incorporate performance management elements, as well as to create forms that are better integrated, web-based, and streamlined. OCS has and will continue to seek input from States and other CSBG Network stakeholders on the clarity, usability, and effectiveness of the revised documents.

As a part of this effort, OCS must clear the revised forms through OMB, as required under the Paperwork Reduction Act of 1995 (PRA). The PRA requires agencies and OMB to ensure that information collected from the public minimizes burden and maximizes practical utility. The OMB/PRA review and approval process includes a 60-day and a 30-day public comment period. For more information about the OMB/PRA clearance process, please see the [Frequently Asked Questions](#) on the U.S. Department of Health and Human Services website.

The COE-developed organizational standards themselves will not go through a formal OMB/PRA clearance process. Rather, OCS will clear elements related to the organizational standards (such as implementation plans, data collection for the accountability measures, etc.) that are incorporated in the CSBG Model State Plan and the CSBG Annual Report forms.

OCS expects to initiate the OMB/PRA clearance process for the CSBG Model State Plan in early 2015. Concurrently, we will begin automating the Model State Plan so that States can access it through the ACF Online Data Collection (OLDC) system. We anticipate States will use the online version of the revised Model State Plan for the FY 2016 application cycle (for applications due September 1, 2015).

Below is information on implementation timing and roll-out of the organizational standards for OCS, States, and eligible entities. If you have questions, please contact an OCS CSBG specialist. The list of OCS staff and contact information is posted on the OCS website at [www.acf.hhs.gov/programs/ocs/resource/csbg-staff-assignments-by-region](http://www.acf.hhs.gov/programs/ocs/resource/csbg-staff-assignments-by-region).

## OCS Responsibilities

<b>Responsibilities</b>	<b>Time Frame</b>
<i>CSBG Model State Plan</i> : Complete the first revision with CSBG Network input	Fall 2014
<i>Final IM on Organizational Standards</i> : Publish	January 2015
<i>CSBG Model State Plan</i> : Program into the ACF Online Data Collection (OLDC) system	Approximately 6 months winter 2015 – spring 2015
<i>CSBG Model State Plan</i> : Request public comments; get HHS and OMB approval	Approximately 6 months winter 2015 – spring 2015
<i>CSBG Model State Plan</i> : Publish and provide training and technical assistance	Spring/summer 2015
<i>Annual Report</i> : Revise, automate, and get OMB approval; with the National Association for State Community Services Programs (NASCSPP)	2015 - 2016

Note: Dates above are contingent on the time frame for final OMB/PRA clearance.

## State Responsibilities

<b>Responsibilities</b>	<b>Time Frame</b>
<i>Organizational Standards</i> : Establish, communicate, and implement	2015
<i>CSBG Model State Plan</i> : Include organizational standards (States will submit State Plans through the OLDC system)	Due by September 1, 2015
<i>Organizational Standards</i> : Assess through established oversight procedures	Starting Federal Fiscal Year 2016
<i>Annual Report</i> : Report performance on organizational standards (State accountability measures)	End of 2016 performance period, by March 2017, as appropriate

## CSBG Eligible Entity Responsibilities

<b>Responsibilities</b>	<b>Time Frame</b>
<i>Organizational Standards</i> : Self-assessment and planning for adoption of standards	2015
<i>Organizational Standards</i> : Assess through established State oversight procedures; Address identified weaknesses and share exceptional practices, with State and technical assistance providers	Starting Federal Fiscal Year 2016

## Conclusion

Together we must insist upon accountability and performance management across the CSBG Network. The COE-developed organizational standards have the potential to protect and enhance the structural integrity of this national network by assuring that all entities that annually receive CSBG funds have the capacity to organize and support a comprehensive community response to the complex social problems that contribute to poverty.

/s/

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Jeannie L. Chaffin  
Director  
Office of Community Services

## Appendices:

**Appendix 1:** Measuring the Success of Community Action and CSBG

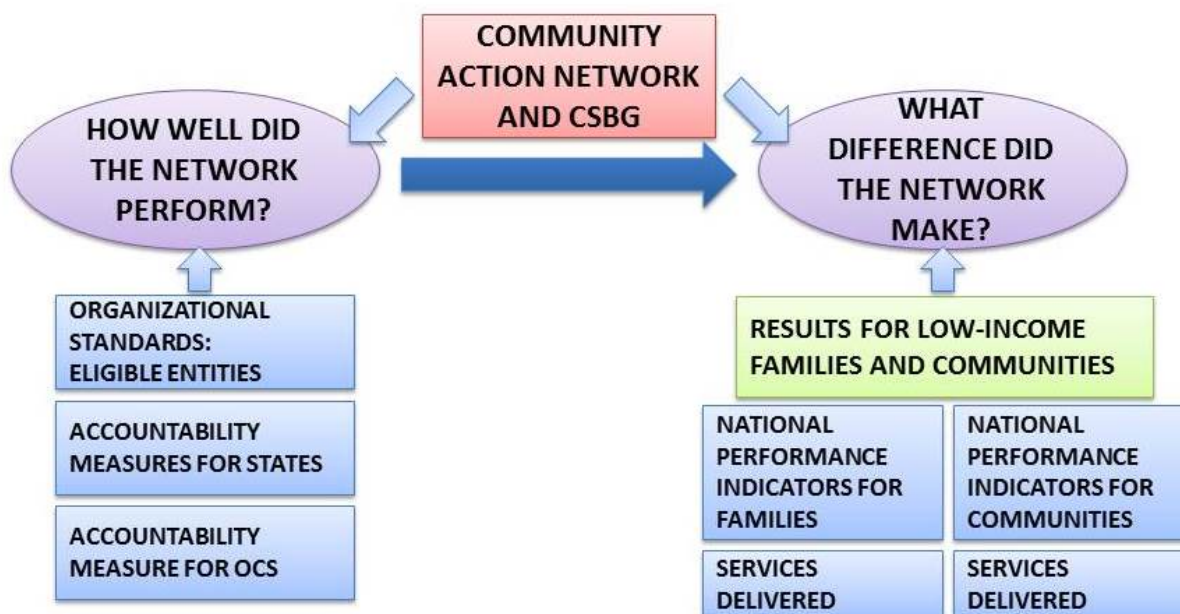
**Appendix 2:** COE-developed Organizational Standards for Private, Nonprofit CSBG Eligible Entities

**Appendix 3:** COE-developed Organizational Standards for Public CSBG Eligible Entities

**Appendix 4:** State Implementation of Organizational Standards – Key Considerations

## Appendix 1: Measuring the Success of Community Action and CSBG

### MEASURING THE SUCCESS OF COMMUNITY ACTION AND CSBG



## Appendix 2: COE-developed Organizational Standards for Private, Nonprofit CSBG Eligible Entities

# ORGANIZATIONAL STANDARDS FOR PRIVATE, NONPROFIT CSBG ELIGIBLE ENTITIES

## MAXIMUM FEASIBLE PARTICIPATION

### Category one: Consumer Input and Involvement

Community Action is rooted in the belief that people with low incomes are in the best position to express what they need to make a difference in their lives. CSBG eligible entities work in partnership with the people and communities they serve. Community Action works in a coordinated and comprehensive manner to develop programs and services that will make a critical difference in the lives of participants. Individuals and families are well attuned to what they need, and when Community Action taps into that knowledge, it informs our ability to implement high-impact programs and services.

Research shows that through engagement in community activities such as board governance, peer to peer leadership, advisory bodies, volunteering, and other participatory means, the poor build personal networks and increase their social capital so that they are able to move themselves and their families out of poverty. Community Action is grounded in helping families and communities build this social capital for movement to self-sufficiency.

<b>Standard 1.1 • private</b>	The organization demonstrates low-income individuals' participation in its activities.
<b>Standard 1.2 • private</b>	The organization analyzes information collected directly from low-income individuals as part of the community assessment.
<b>Standard 1.3 • private</b>	The organization has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the governing board.

## Category two: Community Engagement

No CSBG eligible entity can meet all of a community's needs independently. Through formal and informal partnerships, ongoing community planning, advocacy, and engagement of people with low incomes, partners ranging from community and faith-based organizations, educational institutions, government, and business work together with Community Action Agencies and other CSBG eligible entities to successfully move families out of poverty and revitalize communities.

Community Action is often the backbone organization of community efforts to address poverty and community revitalization: leveraging funds, convening key partners, adding the voice of the underrepresented, and being the central coordinator of efforts. It is not an easy role to play, but a vital one for families and communities.

<b>Standard 2.1 • private</b>	The organization has documented or demonstrated partnerships across the community, for specifically identified purposes; partnerships include other anti-poverty organizations in the area.
<b>Standard 2.2 • private</b>	The organization utilizes information gathered from key sectors of the community in assessing needs and resources, during the community assessment process or other times. These sectors would include at minimum: community-based organizations, faith-based organizations, private sector, public sector, and educational institutions.
<b>Standard 2.3 • private</b>	The organization communicates its activities and its results to the community.
<b>Standard 2.4 • private</b>	The organization documents the number of volunteers and hours mobilized in support of its activities.



### Category three: Community Assessment

Local control of Federal CSBG resources is predicated on regular comprehensive community assessments that take into account the breadth of community needs as well as the partners and resources available in a community to meet these needs. Regular assessment of needs and resources at the community level is the foundation of Community Action and a vital management and leadership tool that is used across the organization and utilized by the community to set the course for both CSBG and all agency resources.

<b>Standard 3.1 • private</b>	The organization conducted a community assessment and issued a report within the past 3 years.
<b>Standard 3.2 • private</b>	As part of the community assessment, the organization collects and includes current data specific to poverty and its prevalence related to gender, age, and race/ethnicity for their service area(s).
<b>Standard 3.3 • private</b>	The organization collects and analyzes both qualitative and quantitative data on its geographic service area(s) in the community assessment.
<b>Standard 3.4 • private</b>	The community assessment includes key findings on the causes and conditions of poverty and the needs of the communities assessed.
<b>Standard 3.5 • private</b>	The governing board formally accepts the completed community assessment.

## VISION AND DIRECTION

### Category four: Organizational Leadership

Community Action leadership is exemplified at all levels across the organization and starts with a mission that clarifies Community Action's work on poverty. A well-functioning board, a focused chief executive officer (CEO)/executive director, well-trained and dedicated staff, and volunteers giving of themselves to help others will establish Community Action as the cornerstone and leverage point to address poverty across the community. Ensuring strong leadership both for today and into the future is critical.

This category addresses the foundational elements of mission as well as the implementation of the Network's model of good performance management (ROMA). It ensures CAAs have taken steps to plan thoughtfully for today's work and tomorrow's leadership.

<b>Standard 4.1 • private</b>	The governing board has reviewed the organization's mission statement within the past 5 years and assured that: <ol style="list-style-type: none"> <li>1. The mission addresses poverty; and</li> <li>2. The organization's programs and services are in alignment with the mission.</li> </ol>
<b>Standard 4.2 • private</b>	The organization's Community Action plan is outcome-based, anti-poverty focused, and ties directly to the community assessment.
<b>Standard 4.3 • private</b>	The organization's Community Action plan and strategic plan document the continuous use of the full Results Oriented Management and Accountability (ROMA) cycle or comparable system (assessment, planning, implementation, achievement of results, and evaluation). In addition, the organization documents having used the services of a ROMA-certified trainer (or equivalent) to assist in implementation.
<b>Standard 4.4 • private</b>	The governing board receives an annual update on the success of specific strategies included in the Community Action plan.
<b>Standard 4.5 • private</b>	The organization has a written succession plan in place for the CEO/executive director, approved by the governing board, which contains procedures for covering an emergency/unplanned, short-term absence of 3 months or less, as well as outlines the process for filling a permanent vacancy.
<b>Standard 4.6 • private</b>	An organization-wide, comprehensive risk assessment has been completed within the past 2 years and reported to the governing board.

## Category five: Board Governance

Community Action boards are uniquely structured to ensure maximum feasible participation by the entire community, including those the network serves. By law, Community Action boards are comprised of at least 1/3 low-income consumers (or their representatives), 1/3 elected officials (or their appointees), and the remainder private-sector community members. To make this structure work as intended, CAAs must recruit board members thoughtfully, work within communities to promote opportunities for board service, and orient, train, and support them in their oversight role. Boards are foundational to good organizational performance and the time invested to keep them healthy and active is significant, but necessary.

<b>Standard 5.1 • private</b>	<p>The organization's governing board is structured in compliance with the CSBG Act:</p> <ol style="list-style-type: none"> <li>1. At least one third democratically-selected representatives of the low-income community;</li> <li>2. One-third local elected officials (or their representatives); and</li> <li>3. The remaining membership from major groups and interests in the community.</li> </ol>
<b>Standard 5.2 • private</b>	The organization's governing board has written procedures that document a democratic selection process for low-income board members adequate to assure that they are representative of the low-income community.
<b>Standard 5.3 • private</b>	The organization's bylaws have been reviewed by an attorney within the past 5 years.
<b>Standard 5.4 • private</b>	The organization documents that each governing board member has received a copy of the bylaws within the past 2 years.
<b>Standard 5.5 • private</b>	The organization's governing board meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its bylaws.
<b>Standard 5.6 • private</b>	Each governing board member has signed a conflict of interest policy within the past 2 years.
<b>Standard 5.7 • private</b>	The organization has a process to provide a structured orientation for governing board members within 6 months of being seated.
<b>Standard 5.8 • private</b>	Governing board members have been provided with training on their duties and responsibilities within the past 2 years.
<b>Standard 5.9 • private</b>	The organization's governing board receives programmatic reports at each regular board meeting.

## Category six: Strategic Planning

Establishing the vision for a Community Action Agency is a big task and setting the course to reach it through strategic planning is serious business. CSBG eligible entities take on this task by looking both at internal functioning and at the community's needs. An efficient organization knows where it is headed, how the board and staff fit into that future, and how it will measure its success in achieving what it has set out to do. This agency-wide process is board-led and ongoing. A "living, breathing" strategic plan with measurable outcomes is the goal, rather than a plan that gets written but sits on a shelf and stagnates. Often set with an ambitious vision, strategic plans set the tone for the staff and board and are a key leadership and management tool for the organization.

<b>Standard 6.1 • private</b>	The organization has an agency-wide strategic plan in place that has been approved by the governing board within the past 5 years.
<b>Standard 6.2 • private</b>	The approved strategic plan addresses reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient.
<b>Standard 6.3 • private</b>	The approved strategic plan contains family, agency, and/or community goals.
<b>Standard 6.4 • private</b>	Customer satisfaction data and customer input, collected as part of the community assessment, is included in the strategic planning process.
<b>Standard 6.5 • private</b>	The governing board has received an update(s) on progress meeting the goals of the strategic plan within the past 12 months.

## OPERATIONS AND ACCOUNTABILITY

### Category seven: Human Resource Management

The human element of Community Action's work is evident at all levels of the organization and the relationship an organization has with its staff often reflects the organization's values and mission. Oversight of the chief executive officer (CEO)/executive director and maintaining a strong human resources infrastructure are key responsibilities of board oversight. Attention to organizational elements such as policies and procedures, performance appraisals, and training lead to strong organizations with the capacity to deliver high-quality services in low-income communities.

<b>Standard 7.1 • private</b>	The organization has written personnel policies that have been reviewed by an attorney and approved by the governing board within the past 5 years.
<b>Standard 7.2 • private</b>	The organization makes available the employee handbook (or personnel policies in cases without a handbook) to all staff and notifies staff of any changes.
<b>Standard 7.3 • private</b>	The organization has written job descriptions for all positions, which have been updated within the past 5 years.
<b>Standard 7.4 • private</b>	The governing board conducts a performance appraisal of the CEO/executive director within each calendar year.
<b>Standard 7.5 • private</b>	The governing board reviews and approves CEO/executive director compensation within every calendar year.
<b>Standard 7.6 • private</b>	The organization has a policy in place for regular written evaluation of employees by their supervisors.
<b>Standard 7.7 • private</b>	The organization has a whistleblower policy that has been approved by the governing board.
<b>Standard 7.8 • private</b>	All staff participate in a new employee orientation within 60 days of hire.
<b>Standard 7.9 • private</b>	The organization conducts or makes available staff development/training (including ROMA) on an ongoing basis.

## Category eight: Financial Operations and Oversight

The fiscal bottom line of Community Action is not isolated from the mission, it is a joint consideration. Community Action boards and staff maintain a high level of fiscal accountability through audits, monitoring by State and Federal agencies, and compliance with Federal Office of Management Budget circulars. The management of Federal funds is taken seriously by CSBG eligible entities and the Standards specifically reflect the board's oversight role as well as the day-to-day operational functions.

<b>Standard 8.1 • private</b>	The organization's annual audit (or audited financial statements) is completed by a Certified Public Accountant on time in accordance with Title 2 of the Code of Federal Regulations, Uniform Administrative Requirements, Cost Principles, and Audit Requirement (if applicable) and/or State audit threshold requirements.
<b>Standard 8.2 • private</b>	All findings from the prior year's annual audit have been assessed by the organization and addressed where the governing board has deemed it appropriate.
<b>Standard 8.3 • private</b>	The organization's auditor presents the audit to the governing board.
<b>Standard 8.4 • private</b>	The governing board formally receives and accepts the audit.
<b>Standard 8.5 • private</b>	The organization has solicited bids for its audit within the past 5 years.
<b>Standard 8.6 • private</b>	The IRS Form 990 is completed annually and made available to the governing board for review.
<b>Standard 8.7 • private</b>	The governing board receives financial reports at each regular meeting that include the following: <ol style="list-style-type: none"> <li>1. Organization-wide report on revenue and expenditures that compares budget to actual, categorized by program; and</li> <li>2. Balance sheet/statement of financial position.</li> </ol>
<b>Standard 8.8 • private</b>	All required filings and payments related to payroll withholdings are completed on time.
<b>Standard 8.9 • private</b>	The governing board annually approves an organization-wide budget.
<b>Standard 8.10 • private</b>	The fiscal policies have been reviewed by staff within the past 2 years, updated as necessary, with changes approved by the governing board.

<b>Standard 8.11 • private</b>	A written procurement policy is in place and has been reviewed by the governing board within the past 5 years.
<b>Standard 8.12 • private</b>	The organization documents how it allocates shared costs through an indirect cost rate or through a written cost allocation plan.
<b>Standard 8.13 • private</b>	The organization has a written policy in place for record retention and destruction.

### Category nine: Data and Analysis

The Community Action Network moves families out of poverty every day across this country and needs to produce data that reflect the collective impact of these efforts. Individual stories are compelling when combined with quantitative data: *no data without stories and no stories without data*. Community Action needs to better document the outcomes families, agencies, and communities achieve. The Community Services Block Grant funding confers the obligation and opportunity to tell the story of agency-wide impact and community change, and in turn the impact of the Network as a whole.

<b>Standard 9.1 • private</b>	The organization has a system or systems in place to track and report client demographics and services customers receive.
<b>Standard 9.2 • private</b>	The organization has a system or systems in place to track family, agency, and/or community outcomes.
<b>Standard 9.3 • private</b>	The organization has presented to the governing board for review or action, at least within the past 12 months, an analysis of the agency's outcomes and any operational or strategic program adjustments and improvements identified as necessary.
<b>Standard 9.4 • private</b>	The organization submits its annual CSBG Information Survey data report and it reflects client demographics and organization-wide outcomes.



## Appendix 3: COE-developed Organizational Standards for Public CSBG Eligible Entities

# ORGANIZATIONAL STANDARDS FOR PUBLIC CSBG ELIGIBLE ENTITIES

## MAXIMUM FEASIBLE PARTICIPATION

### Category one: Consumer Input and Involvement

Community Action is rooted in the belief that people with low incomes are in the best position to express what they need to make a difference in their lives. CSBG eligible entities work in partnership with the people and communities they serve. Community Action works in a coordinated and comprehensive manner to develop programs and services that will make a critical difference in the lives of participants. Individuals and families are well attuned to what they need, and when Community Action taps into that knowledge, it informs our ability to implement high impact programs and services.

Research shows that through engagement in community activities such as board governance, peer to peer leadership, advisory bodies, volunteering, and other participatory means, the poor build personal networks and increase their social capital so that they are able to move themselves and their families out of poverty. Community Action is grounded in helping families and communities build this social capital for movement to self-sufficiency.

<b>Standard 1.1 • public</b>	The department demonstrates low-income individuals' participation in its activities.
<b>Standard 1.2 • public</b>	The department analyzes information collected directly from low-income individuals as part of the community assessment.
<b>Standard 1.3 • public</b>	The department has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the tripartite board/advisory body, which may be met through broader local government processes.

## Category two: Community Engagement

No CSBG eligible entity can meet all of a community's needs independently. Through formal and informal partnerships, ongoing community planning, advocacy, and engagement of people with low incomes, partners ranging from community and faith-based organizations, educational institutions, government, and business can work together with Community Action agencies and other CSBG eligible entities to successfully move families out of poverty and revitalize communities.

Community Action is often the backbone organization of community efforts to address poverty and community revitalization: leveraging funds, convening key partners, adding the voice of the underrepresented, and being the central coordinator of efforts. It is not an easy role to play, but a vital one for families and communities.

<b>Standard 2.1 • public</b>	The department has documented or demonstrated partnerships across the community, for specifically identified purposes; partnerships include other anti-poverty organizations in the area.
<b>Standard 2.2 • public</b>	The department utilizes information gathered from key sectors of the community in assessing needs and resources, during the community assessment process or other times. These sectors would include at minimum: community-based organizations, faith-based organizations, private sector, public sector, and educational institutions.
<b>Standard 2.3 • public</b>	The department communicates its activities and its results to the community.
<b>Standard 2.4 • public</b>	The department documents the number of volunteers and hours mobilized in support of its activities.

### Category three: Community Assessment

Local control of Federal CSBG resources is predicated on regular comprehensive community assessments that take into account the breadth of community needs as well as the partners and resources available in a community to meet these needs. Regular assessment of needs and resources at the community level is the foundation of Community Action and a vital management and leadership tool that is used across the organization and utilized by the community to set the course for both CSBG and all agency resources.

<b>Standard 3.1 • public</b>	The department conducted or was engaged in a community assessment and issued a report within the past 3 years, if no other report exists.
<b>Standard 3.2 • public</b>	As part of the community assessment, the department collects and includes current data specific to poverty and its prevalence related to gender, age, and race/ethnicity for their service area(s).
<b>Standard 3.3 • public</b>	The department collects and analyzes both qualitative and quantitative data on its geographic service area(s) in the community assessment.
<b>Standard 3.4 • public</b>	The community assessment includes key findings on the causes and conditions of poverty and the needs of the communities assessed.
<b>Standard 3.5 • public</b>	The tripartite board/advisory body formally accepts the completed community assessment.

## VISION AND DIRECTION

### Category four: Organizational Leadership

Community Action leadership is exemplified at all levels across the organization and starts with a mission that clarifies Community Action's work on poverty. A well-functioning board, a focused department head, well-trained and dedicated staff, and volunteers giving of themselves to help others will establish Community Action as the cornerstone and leverage point to address poverty across the community. Ensuring strong leadership both for today and into the future is critical.

This category addresses the foundational elements of mission as well as the implementation of the Network's model of good performance management (ROMA). It ensures CAAs have taken steps to plan thoughtfully for today's work and tomorrow's leadership.

<b>Standard 4.1 • public</b>	The tripartite board/advisory body has reviewed the department's mission statement within the past 5 years and assured that: <ol style="list-style-type: none"> <li>1. The mission addresses poverty; and</li> <li>2. The CSBG programs and services are in alignment with the mission.</li> </ol>
<b>Standard 4.2 • public</b>	The department's Community Action plan is outcome-based, anti-poverty focused, and ties directly to the community assessment.
<b>Standard 4.3 • public</b>	The department's Community Action plan and strategic plan document the continuous use of the full Results Oriented Management and Accountability (ROMA) cycle or comparable system (assessment, planning, implementation, achievement of results, and evaluation). In addition, the department documents having used the services of a ROMA-certified trainer (or equivalent) to assist in implementation.
<b>Standard 4.4 • public</b>	The tripartite board/advisory body receives an annual update on the success of specific strategies included in the Community Action plan.
<b>Standard 4.5 • public</b>	The department adheres to its local government's policies and procedures around interim appointments and processes for filling a permanent vacancy.
<b>Standard 4.6 • public</b>	The department complies with its local government's risk assessment policies and procedures.

## Category five: Board Governance

Community Action boards are uniquely structured to ensure maximum feasible participation by the entire community, including those the Network serves. By law, Community Action boards are comprised of at least 1/3 low-income consumers (or their representatives), 1/3 elected officials (or their appointees), and the remainder private-sector community members. To make this structure work as intended, CAAs must recruit board members thoughtfully, work within communities to promote opportunities for board service, and orient, train, and support them in their oversight role. Boards are foundational to good organizational performance and the time invested to keep them healthy and active is significant, but necessary.

### Standard 5.1 • public

The department's tripartite board/advisory body is structured in compliance with the CSBG Act, by either:

1. Selecting the board members as follows:
  - At least one third are democratically-selected representatives of the low-income community;
  - One-third are local elected officials (or their representatives); and
  - The remaining members are from major groups and interests in the community; or
2. Selecting the board through another mechanism specified by the State to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs.

### Standard 5.2 • public

The department's tripartite board/advisory body either has:

1. Written procedures that document a democratic selection process for low-income board members adequate to assure that they are representative of the low-income community, or
2. Another mechanism specified by the State to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs.

*Please note under [IM 82](#) for Public Entities the law also requires that a minimum of 1/3 of tripartite board membership be comprised of representatives of low-income individuals and families who reside in areas served.*

### Standard 5.3 • public

Not applicable: Review of bylaws by an attorney is outside of the purview of the department and the tripartite board/advisory body, therefore this standard does not apply to public entities.

### Standard 5.4 • public

The department documents that each tripartite board/advisory body member has received a copy of the governing documents, within the past 2 years.

<b>Standard 5.5 • public</b>	The department's tripartite board/advisory body meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its governing documents.
<b>Standard 5.6 • public</b>	Each tripartite board/advisory body member has signed a conflict of interest policy, or comparable local government document, within the past 2 years.
<b>Standard 5.7 • public</b>	The department has a process to provide a structured orientation for tripartite board/advisory body members within 6 months of being seated.
<b>Standard 5.8 • public</b>	Tripartite board/advisory body members have been provided with training on their duties and responsibilities within the past 2 years.
<b>Standard 5.9 • public</b>	The department's tripartite board/advisory body receives programmatic reports at each regular board/advisory meeting.

## Category six: Strategic Planning

Establishing the vision for a Community Action agency is a big task and setting the course to reach it through strategic planning is serious business. CSBG eligible entities take on this task by looking both at internal functioning and at the community's needs. An efficient organization knows where it is headed, how the board and staff fit into that future, and how it will measure its success in achieving what it has set out to do. This agency-wide process is board-led and ongoing. A "living, breathing" strategic plan with measurable outcomes is the goal, rather than a plan that gets written but sits on a shelf and stagnates. Often set with an ambitious vision, strategic plans set the tone for the staff and board and are a key leadership and management tool for the organization.

<b>Standard 6.1 • public</b>	The department has a strategic plan, or comparable planning document, in place that has been reviewed and accepted by the tripartite board/advisory body within the past 5 years. If the department does not have a plan, the tripartite board/advisory body will develop the plan.
<b>Standard 6.2 • public</b>	The approved strategic plan, or comparable planning document, addresses reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient.
<b>Standard 6.3 • public</b>	The approved strategic plan, or comparable planning document, contains family, agency, and/or community goals.
<b>Standard 6.4 • public</b>	Customer satisfaction data and customer input, collected as part of the community assessment, is included in the strategic planning process, or comparable planning process.
<b>Standard 6.5 • public</b>	The tripartite board/advisory body has received an update(s) on progress meeting the goals of the strategic plan/comparable planning document within the past 12 months.

## OPERATIONS AND ACCOUNTABILITY

### Category seven: Human Resource Management

The human element of Community Action's work is evident at all levels of the organization and the relationship an organization has with its staff often reflects the organization's values and mission. Oversight of the department head and maintaining a strong human resources infrastructure are key responsibilities of board oversight. Attention to organizational elements such as policies and procedures, performance appraisals, and training lead to strong organizations with the capacity to deliver high-quality services in low-income communities.

<b>Standard 7.1 • public</b>	Not applicable: Local governmental personnel policies are outside of the purview of the department and the tripartite board/advisory body, therefore this standard does not apply to public entities.
<b>Standard 7.2 • public</b>	The department follows local governmental policies in making available the employee handbook (or personnel policies in cases without a handbook) to all staff and in notifying staff of any changes.
<b>Standard 7.3 • public</b>	The department has written job descriptions for all positions. Updates may be outside of the purview of the department.
<b>Standard 7.4 • public</b>	The department follows local government procedures for performance appraisal of the department head.
<b>Standard 7.5 • public</b>	The compensation of the department head is made available according to local government procedure.
<b>Standard 7.6 • public</b>	The department follows local governmental policies for regular written evaluation of employees by their supervisors.
<b>Standard 7.7 • public</b>	The department provides a copy of any existing local government whistleblower policy to members of the tripartite board/advisory body at the time of orientation.
<b>Standard 7.8 • public</b>	The department follows local governmental policies for new employee orientation.
<b>Standard 7.9 • public</b>	The department conducts or makes available staff development/training (including ROMA training) on an ongoing basis.



## Category eight: Financial Operations and Oversight

The fiscal bottom line of Community Action is not isolated from the mission; it is a joint consideration. Community Action boards and staff maintain a high level of fiscal accountability through audits, monitoring by State and Federal agencies, and compliance with Federal Office of Management Budget circulars. The management of Federal funds is taken seriously by CSBG eligible entities and the Standards specifically reflect the board's oversight role as well as the day-to-day operational functions.

<b>Standard 8.1 • public</b>	The department's annual audit is completed through the local governmental process in accordance with Title 2 of the Code of Federal Regulations, Uniform Administrative Requirements, Cost Principles, and Audit Requirement (if applicable) and/or State audit threshold requirements. This may be included in the municipal entity's full audit.
<b>Standard 8.2 • public</b>	The department follows local government procedures in addressing any audit findings related to CSBG funding.
<b>Standard 8.3 • public</b>	The department's tripartite board/advisory body is notified of the availability of the local government audit.
<b>Standard 8.4 • public</b>	The department's tripartite board/advisory body is notified of any findings related to CSBG funding.
<b>Standard 8.5 • public</b>	Not applicable: The audit bid process is outside of the purview of tripartite board/advisory body therefore this standard does not apply to public entities.
<b>Standard 8.6 • public</b>	Not applicable: The Federal tax reporting process for local governments is outside of the purview of tripartite board/advisory body therefore this standard does not apply to public entities.
<b>Standard 8.7 • public</b>	The tripartite board/advisory body receives financial reports at each regular meeting, for those program(s) the body advises, as allowed by local government procedure.
<b>Standard 8.8 • public</b>	Not applicable: The payroll withholding process for local governments is outside of the purview of the department, therefore this standard does not apply to public entities.
<b>Standard 8.9 • public</b>	The tripartite board/advisory body has input as allowed by local governmental procedure into the CSBG budget process.

<b>Standard 8.10 • public</b>	Not applicable: The fiscal policies for local governments are outside of the purview of the department and the tripartite board/advisory body, therefore this standard does not apply to public entities.
<b>Standard 8.11 • public</b>	Not applicable: Local governmental procurement policies are outside of the purview of the department and the tripartite board/advisory body, therefore this standard does not apply to public entities.
<b>Standard 8.12 • public</b>	Not applicable: A written cost allocation plan is outside of the purview of the department and the tripartite board/advisory body, therefore this standard does not apply to public entities.
<b>Standard 8.13 • public</b>	The department follows local governmental policies for document retention and destruction.

### Category nine: Data and Analysis

The Community Action Network moves families out of poverty every day across this country and needs to produce data that reflect the collective impact of these efforts. Individual stories are compelling when combined with quantitative data: *no data without stories and no stories without data*. Community Action needs to better document the outcomes families, agencies, and communities achieve. The Community Services Block Grant funding confers the obligation and opportunity to tell the story of agency-wide impact and community change, and in turn the impact of the Network as a whole.

<b>Standard 9.1 • public</b>	The department has a system or systems in place to track and report client demographics and services customers receive.
<b>Standard 9.2 • public</b>	The department has a system or systems in place to track family, agency, and/or community outcomes.
<b>Standard 9.3 • public</b>	The department has presented to the tripartite board/advisory body for review or action, at least within the past 12 months, an analysis of the agency's outcomes and any operational or strategic program adjustments and improvements identified as necessary.
<b>Standard 9.4 • public</b>	The department submits its annual CSBG Information Survey data report and it reflects client demographics and CSBG-funded outcomes.

## Appendix 4: State Implementation of Organizational Standards – Key Considerations

Critical Action Area	Description	Critical Partners and Available Resources
<b>Initial discussions with key partners in the State</b>	<i>State convenes discussions with eligible entities, State CAA Association, and other partners to discuss process and timeline for adopting COE-developed organizational standards.</i>	State CSBG Lead Agency, eligible entities, State CAA Association
<b>Assessment of State laws and rulemaking requirements</b>	<i>State CSBG officials, legal counsel, and contracting officials review existing State laws, regulations, and contracting procedures for necessary actions or venues for communication of standards (e.g. State register).</i>	State procurement office, State agency counsel, National Association for State Community Services Programs (NASCS), Community Action Program Legal Services, Inc.
<b>Development and public notification of State standards</b>	<i>After review of current rules, standards and requirements, State CSBG officials identify and communicate anticipated organizational standards for CSBG eligible entities. Standards are communicated in writing through State register notice, website publication, or other public notice consistent with State procedures and rulemaking requirements.</i>	CSBG Organizational Standards Center of Excellence
<b>Opportunities for input on timelines and procedures</b>	<i>Through public meetings, consultations, hearings, and written input processes, States provide opportunities for input from CSBG eligible entities and other stakeholders on the timelines and procedures for implementation of organizational standards, including processes for incorporating into State monitoring procedures and organizational bylaws, as appropriate.</i>	CSBG Regional Performance and Innovation Consortia (RPIC), State CAA Association
<b>Development and communication of technical assistance strategies</b>	<i>In partnership with State and national technical assistance partners, the State establishes and communicates a technical assistance strategy to help assure that all CSBG eligible entities have access to technical assistance to meet required standards. Assistance in agency self-assessment may be provided. Technical assistance may be funded through State discretionary resources, may be sponsored federally, or may be paid for by affected organizations, as appropriate.</i>	CSBG Organizational Standards Center of Excellence, CSBG Learning Communities Resource Center, CSBG Risk Mitigation Training and Technical Assistance Center, CSBG RPIC, State CSBG Associations, Office of Community Services (OCS) State Liaison staff
<b>Incorporation of standards in State CSBG Plan</b>	<i>State CSBG officials incorporate organizational standards and procedures for implementation into annual State CSBG Plans. These plans are made available for</i>	NASCS, CSBG Organizational Standards Center of Excellence, OCS State Liaison staff

Critical Action Area	Description	Critical Partners and Available Resources
	<i>public inspection consistent with requirements in the CSBG Act and are submitted for Federal review as part of the application for CSBG funds.</i>	
<b>Incorporation of standards in local CSBG Plans and agency procedures</b>	<i>Eligible entity boards and leadership incorporate organizational standards into agency procedures and practices, as appropriate, to assure compliance with all standards and procedures. Compliance with organizational standards is incorporated into board oversight and executive performance plans as appropriate.</i>	CSBG Organizational Standards of Excellence, Community Action Program Legal Services, Inc., State CAA Associations
<b>Assessment and communication of results</b>	<i>State organizational standards are incorporated into State oversight procedures. As required under the CSBG Act, a full onsite review is conducted at least once every three years and ad hoc monitoring is conducted as necessary.</i>	NASCS, CSBG Organizational Standards Center of Excellence, OCS State Liaison staff
<b>Corrective action cycle</b>	<i>When State identifies non-compliance through State monitoring, it clearly communicates specific deficiencies and requirements for corrective action and offers technical assistance as appropriate. As necessary, States may initiate further procedures or funding actions consistent with the CSBG Act. In situations in which an eligible entity does not correct significant deficiencies within required deadlines, or in which widespread or systemic issues are identified that cannot feasibly be corrected in a reasonable timeframe, a State may initiate action to terminate eligible entity status consistent with the CSBG Act. Conversely, agencies that are identified as having best practices related to State standards may be identified as exemplars and assist in quality improvement efforts as appropriate.</i>	CSBG Learning Communities Resource Center, CSBG Risk Mitigation Training and Technical Assistance Center, State CSBG Associations, OCS State Liaison staff  Note: For detailed guidance on CSBG requirements, see <a href="#">IM 116</a> .



## **COMMUNITY SERVICE BLOCK GRANTS (CSBG) POLICIES AND PROCEDURES**

### **Appendix 11**

### **CAP's Organizational Standards Assessment Tool**

# STANDARDS



COE DEVELOPED CSBG  
ORGANIZATIONAL STANDARDS

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## State Assessment Tool for Private CEEs

Community Action Partnership  
1140 Connecticut Avenue, NW, Suite 1210  
Washington, DC 20036  
202.265.7546 | FAX 202.265.5048  
[WWW.COMMUNITYACTIONPARTNERSHIP.COM](http://WWW.COMMUNITYACTIONPARTNERSHIP.COM)

# STATE ASSESSMENT TOOL FOR PRIVATE CEEs

The CSBG organizational standards provide a standard foundation of organizational capacity for all CSBG Eligible Entities (CEEs) across the United States. The Federal Office of Community Services' Information Memorandum (IM) 138 provides direction to States and CEEs on establishing organizational standards by FY 2016 and includes the final wording of the standards developed by the OCS-funded organizational standards Center of Excellence (COE).

The COE-developed organizational standards are comprehensive and were developed by and for the CSBG Network through the work of the CSBG Working Group. They work together to characterize an effective and healthy organization while reflecting the vision and values of Community Action and the requirements of the CSBG Act.

The following assessment tool is intended as a starting point for State CSBG Offices that will need to assess the CEEs in their states against the COE-developed organizational standards. The tool has been modified from earlier versions to reflect the final standards language included in IM 138. This tool can be modified to meet the needs of States and CEEs and provides guidance regarding the intent of the CSBG Working Group as they developed the standards. While the guidance provided in this assessment tool and the Glossary may not provide the level of detail desired in all categories, it is hoped that it can spur additional conversation between CEEs and the State CSBG Offices as these groups come together on standards implementation at the state level. Please note the guidance provided is that of the Center of Excellence, and should not be considered binding. The State CSBG Office and local CEEs are encouraged to work together to come to agreement in each State as to the guidance for each standard.

As noted above, this tool has been updated with the final language for the COE-developed organizational standards as issued in IM 138. Please note that the Center of Excellence may provide additional modifications to this guidance and may modify the tool as work of the CSBG Working Group and Center of Excellence work continues and CEEs and States work together to implement the CSBG organizational standards.

**This tool is designed to be used by State CSBG Offices in cooperation with private (nonprofit) CEEs to help assess where they stand in comparison to the standards.**

It is important to note:

- **This tool incorporates the final language for each of the 58 standards for Private CEEs as described in IM 138.** The COE-developed organizational standards are now considered final and the language in this tool for each of the standards has been modified to match IM 138.
- **This tool is meant to be a resource for CSBG Eligible Entities and State CSBG Offices and is meant to be used internally.** It is hoped this promotes conversation, dialogue, and cooperation. However, earlier iterations of the tools have been used by States and Agencies to assess to the standards as they ramp up to FY 2016, and these updated tools may be used by States to inform the assessment and monitoring process.
- **Similar tools have been developed for Agencies and States.** While the tools have slightly different presentations for Agencies and States, the language and guidance is the same for each standard. There is some variance on language related to Private CEEs and Public CEEs as there is in the COE-developed standards. In addition, a *Glossary of Terms* has been created that users of this tool may want to also reference.
- **The guidance provided is not binding.** The guidance provided in this tool is meant to help frame the intent of the standards and, along with the Glossary, provide readers with information regarding the meaning of the standards as develop by the CSBG Working Group. As assessment and monitoring protocols are adjusted to incorporate standards, there may be additional information that comes through the



conversations between State CSBG Offices and CEEs. If deemed appropriate, the COE may modify the guidance included in this tool to reflect new information and/or good practices as the tools are used.

- **This tool may change going forward.** This tool and its layout may be amended as the COE develops tools for the implementation phase of standards. Also, as CEEs and States work to implement the standards, the design and content may change to reflect what has been learned.
- **This tool is adaptable to your needs.** This tool is meant to be used by CEEs for internal assessment. Prior iterations of this tool have been downloaded by CEEs and modified to meet individual agency needs. This is an appropriate and hoped for use of this tool and CEE boards and staff are encouraged to share ways they have used this tool with the COE and CSBG Working Group. It is available in both PDF and Microsoft Word formats to make it more flexible.
- **Refer back to IM 138.** All users of this tool are encouraged to read and refer back to IM 138 regarding implementation of CSBG organizational standards

*There are several elements to this tool:*

**First,** there is brief guidance on what has been heard in the field on each standard. It is not binding guidance, and attempts to clarify issues that have been raised without unintentionally narrowing them.

**Second,** is the standard assessed as *Met* or *Not Met*?

**Third,** what document(s) were used to assess the standard? Agencies that have had reviews that relied on specific documentation have found it easier to demonstrate they meet a standard. Recording the document(s) or tool(s) used on this assessment may assist in gathering additional documentation in the future. This is not intended to be an exhaustive list, nor should an agency need to have all of the sample documentation in place. This list is only meant to provide examples of ways that CEEs can demonstrate and record how they meet individual standards. There is a space on the tool to note documentation that was used but was not included on the pre-populated list.

**Fourth,** if the standard is not currently met, what is the progress has been done to date by the Organization to meet the standard.

**Fifth,** what action steps, if any, are planned by the Organization to meet or even exceed the standard.

**Sixth,** there are places following each standard to capture general notes and to outline next steps if needed or desired.

If you have questions or feedback about these assessment tools, please contact Jarl Crocker at [jcrocker@communityactionpartnership.com](mailto:jcrocker@communityactionpartnership.com) or Cashin Yiu at [cyyiu@communityactionpartnership.com](mailto:cyyiu@communityactionpartnership.com).

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## **Maximum Feasible Participation – Category 1: Consumer Input and Involvement**

**Standard 1.1      The organization demonstrates low-income individuals' participation in its activities.**

### **Guidance**

- This Standard is meant to embody “maximum feasible participation”.
- The intent of this Standard is to go beyond board membership; however, board participation may be counted toward meeting this Standard if no other involvement is provided. The tripartite board is only one of many mechanisms through which CEEs engage people with low-incomes.
- Participation can include activities such as Head Start Policy Council, tenant or neighborhood councils, and volunteering, etc.
- Though not mandatory, many CEEs meet this Standard by including advisory bodies to the board.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Advisory group documents  
☐ Advisory group minutes  
☐ Activity participation lists  
☐ Board minutes  
☐ Board pre-meeting materials/packet  
☐ Volunteer lists and documents

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## **Maximum Feasible Participation – Category 1: Consumer Input and Involvement**

**Standard 1.2      The organization analyzes information collected directly from low-income individuals as part of the community assessment.**

### **Guidance**

- This Standard reflects the need for CEEs to talk directly with low-income individuals regarding the needs in the community.
- Data can be collected through a variety of ways including, but not limited to, focus groups, interviews, community forums, customer surveys, etc.
- Analyzing the information can be met through review of the collected data by staff and/or board, including a review of collected data in the written community assessment, with notations of this review in the Assessment's Appendix, committee minutes, etc.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Community assessment document (including appendices)  
☐ Backup documentation/data summaries  
☐ Community forum summaries  
☐ Interview transcripts

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## **Maximum Feasible Participation – Category 1: Consumer Input and Involvement**

**Standard 1.3**      **The organization has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the governing board.**

### **Guidance**

- This reflects the need for any business to gather information regarding customer satisfaction. All organizations need to be aware of how satisfied their customers are of the services they receive.
- This Standard does not imply that a specific satisfaction level needs to be achieved.
- Documentation is needed to demonstrate all three components in order to meet the Standard: 1) collection, 2) analysis, and 3) reporting of data.
- A systematic approach may include, but not be limited to, surveys or other tools being distributed to customers annually, quarterly, or at the point of service (or on a schedule that works for the individuation CEE). Such collection may occur by program or agency-wide at a point in time.
- Analyzing the findings is typically completed by staff.
- Reporting to the board may be via written or verbal formats.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Customer satisfaction policy and/or procedures
- ☐ Customer satisfaction instruments, e.g., surveys, data collection tools, and schedule
- ☐ Customer satisfaction reports to organizational leadership, board and/or broader community
- ☐ Board/committee minutes

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## Maximum Feasible Participation – Category 2: Community Engagement

**Standard 2.1**      **The organization has documented or demonstrated partnerships across the community, for specifically identified purposes; partnerships include other anti-poverty organizations in the area.**

### **Guidance**

- Partnerships are considered to be mutually beneficial arrangements wherein each entity contributes and/or receives: time, effort, expertise and/or resources.
- Specifically identified purposes may include but are not limited to: shared projects; community collaborations/coalitions with an identified topic e.g. domestic violence, homelessness, teen pregnancy prevention, transportation task forces, community economic development projects, etc.; contractually coordinated services; etc.
- The IS Report already asks for a list of partners. The intent of this standard is not to have another list, but to have documentation that shows what these partnerships entail and/or achieve.
- These could be documented through MOUs, contracts, agreements, documented outcomes, coalition membership, etc.
- This standard does not require that every partnership is a formal, fully documented relationship.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Partnership documentation: agreements, emails, MOU/MOAs  
☐ Sub contracts with delegate/partner agencies  
☐ Coalition membership lists  
☐ Strategic plan update/report if it demonstrates partnerships

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## **Maximum Feasible Participation – Category 2: Community Engagement**

**Standard 2.2**      **The organization utilizes information gathered from key sectors of the community in assessing needs and resources, during the community assessment process or other times. These sectors would include at minimum: community-based organizations, faith-based organizations, private sector, public sector, and educational institutions.**

### **Guidance**

- If gathered during the community assessment, it would be documented in the assessment. If done during “other times” this may be reflected in reports, data analysis, or staff/board meeting minutes.
- Engagement may include: key informant interviews, staff participation in other community groups/advisory bodies, community-wide processes, etc.
- Documentation is needed to demonstrate that all five sectors have been engaged: community-based organizations, faith-based organizations, private sector, public sector, and educational institutions. There is no requirement for how many individual organizations the CEE must contact, or what data is collected.
- If one or more of these sectors are not present in the community or refuses to participate, then the CEE needs to demonstrate the gap or a good faith effort to engage the sector(s).
- Demonstrating that you have “gathered” and “used” the information may be met in a variety of ways including, but not limited to: summarizing the data in the community assessment or its appendices; documentation of phone calls, surveys interviews, focus groups in CEE files (hard copy or electronic); documentation in planning team minutes; summary reports on the data shared at board meetings or board committees; etc.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Community assessment document (including appendices)  
☐ Other written or online reports  
☐ Backup documentation of involvement: surveys, interview documentation, community meeting minutes, etc.  
☐ Board/committee or staff meeting minutes

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## Maximum Feasible Participation – Category 2: Community Engagement

### **Standard 2.3      The organization communicates its activities and its results to the community.**

#### **Guidance**

- This may be met through a CEEs annual report, Social Media activity, traditional news media, community outreach activities, etc.
- Community would be defined by the CEE but needs to include those outside of the staff and board of the CEE.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Annual Report
- ☐ Website, Facebook Page, Twitter account, etc.  
(regularly updated)
- ☐ Media files of stories published
- ☐ News release copies
- ☐ Community event information
- ☐ Communication plan

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## Maximum Feasible Participation – Category 2: Community Engagement

**Standard 2.4**      **The organization documents the number of volunteers and hours mobilized in support of its activities.**

### **Guidance**

- There is no requirement to utilize volunteers, only to document their number and hours, if utilized.
- This information should already be collected as part of current National Performance Indicators.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Data on number of volunteers and hours provided  
☐ Board minutes  
☐ Documentation of tracking system(s)

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**



## **Maximum Feasible Participation – Category 3: Community Assessment**

**Standard 3.1**      **The organization conducted a community assessment and issued a report within the past 3 years.**

### **Guidance**

- This Standard refers to what is sometimes called a community needs assessment, and requires that CEEs assess both needs and resources in the community. The requirement for this assessment is outlined in the CSBG Act.
- This may require CSBG Lead Offices to adjust timeframes for required submission.
- The report may be electronic or print, and may be circulated as the CEE deems appropriate. This can include: websites, mail/email distribution, social media, press conference, etc.
- It may be helpful for CEEs to document the report release date such as April 2014 or December 2015.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Community assessment document with date noted

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## **Maximum Feasible Participation – Category 3: Community Assessment**

**Standard 3.2** As part of the community assessment, the organization collects and includes current data specific to poverty and its prevalence related to gender, age, and race/ethnicity for their service area(s).

### **Guidance**

- Documentation is needed to demonstrate all four categories in order to meet the Standard: gender, age, race, and ethnicity.
- Data on poverty is available from the U.S. Census Bureau.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Community assessment document (including appendices)  
☐ Backup information including census and other demographic data

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## **Maximum Feasible Participation – Category 3: Community Assessment**

**Standard 3.3      The organization collects and analyzes both qualitative and quantitative data on its geographic service area(s) in the community assessment.**

### **Guidance**

- Documentation is needed to demonstrate that both types of data are collected in order to meet the Standard:
  - Qualitative: this is opinions, observations, and other descriptive information obtained from the community through surveys, focus groups, interviews, community forums, etc.
  - Quantitative: this is numeric information, e.g. Census data, program counts, demographic information, and other statistical sources.
- Documentation on data analysis is also required in order to meet the Standard.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Community assessment document (including appendices)
- ☐ Backup documentation
- ☐ Broader community-wide assessment
- ☐ Other data collection process on poverty
- ☐ Committee/team minutes reflecting analysis

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## **Maximum Feasible Participation – Category 3: Community Assessment**

**Standard 3.4**      **The community assessment includes key findings on the causes and conditions of poverty and the needs of the communities assessed.**

### **Guidance**

- There is no required way to reflect this information
- The organization may choose to include a key findings section in the assessment report and/or executive summary.
- Conditions of poverty may include items such as: numbers of homeless, free and reduced school lunch statistics, SNAP participation rates, etc.
- Causes of poverty may include items such as: lack of living wage jobs, lack of affordable housing, low education attainment rates, etc.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Community assessment document (including appendices)  
☐ Backup documentation  
☐ Committee/team meeting minutes reflecting analysis

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## Maximum Feasible Participation – Category 3: Community Assessment

### **Standard 3.5      The governing board formally accepts the completed community assessment.**

#### **Guidance**

- This would be met through the Board voting on a motion to accept the Assessment at a regular board meeting and documenting this in the minutes.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Community assessment document  
☐ Board minutes  
☐ Board pre-meeting materials/packet

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## **Vision and Direction – Category 4: Organizational Leadership**

<b>Standard 4.1</b>	<b>The governing board has reviewed the organization’s mission statement within the past 5 years and assured that:</b> <ol style="list-style-type: none"><li><b>1. The mission addresses poverty; and</b></li><li><b>2. The organization’s programs and services are in alignment with the mission.</b></li></ol>
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### **Guidance**

- “Addresses poverty” does not require using the specific word poverty in the organization’s mission.
- Language such as but not limited to: low-income, self-sufficiency, economic security, etc. is acceptable.
- It is the board that determines if the programs and services are in alignment with the mission. This review and formal determination would be recorded in the board minutes.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Board minutes
- ☐ Strategic plan
- ☐ Mission statement

### **Other Documentation:**

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### **If not met, progress to date on meeting the Standard:**

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### **Action steps to be taken to meet the Standard:**

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### **Notes:**

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## **Vision and Direction – Category 4: Organizational Leadership**

**Standard 4.2      The organization's Community Action plan is outcome-based, anti-poverty focused, and ties directly to the community assessment.**

### **Guidance**

- The State Lead Agency is responsible for determining the plan's format, and needs to ensure that the three components are readily identifiable.
- The plan needs to be focused on outcomes, i.e., changes in status (such as hunger alleviation vs. food baskets).
- The Community Action plan is sometimes referred to as the CSBG plan or CSBG workplan.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ CAP Plan\*  
☐ Logic model  
☐ Community assessment

\*The CAP Plan is sometimes referred to as the CSBG Plan or CSBG Workplan

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## **Vision and Direction – Category 4: Organizational Leadership**

**Standard 4.3**      The organization’s Community Action plan and strategic plan document the continuous use of the full Results Oriented Management and Accountability (ROMA) cycle or comparable system (assessment, planning, implementation, achievement of results, and evaluation). In addition, the organization documents having used the services of a ROMA-certified trainer (or equivalent) to assist in implementation.

### **Guidance**

- There is no requirement to have a certified ROMA trainer on staff at the organization.
- While a ROMA trainer (or equivalent) must be involved, it is up to the organization to determine the manner in which this individual is utilized. Examples include: involving the trainer in strategic planning meetings, consultation on implementation, etc.
- This includes involving a ROMA trainer (or equivalent) in the course of ROMA-cycle activities such as the community assessment, strategic planning, data and analysis, and does not need to be a separate activity.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Certified ROMA trainer in the organization
- ☐ Agreement with certified trainer not within the organization to provide ROMA services
- ☐ Strategic plan (including appendices)
- ☐ Community action plan (including appendices)
- ☐ Meeting summaries of ROMA trainer participation

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**



## **Vision and Direction – Category 4: Organizational Leadership**

**Standard 4.4**      **The governing board receives an annual update on the success of specific strategies included in the Community Action plan.**

### **Guidance**

- The CSBG Act requires that boards be involved with assessment, planning, implementation, and evaluation of the programs: this standard supports meeting that requirement.
- This standard is met by an update being provided at a regular board meeting, and documented in the minutes.
- The update provided to the board may be written or verbal.
- The update provided to the board should include specific strategies outlined in the Community Action plan and any progress made over the course of the last year, or by another period of time as determined by the board that is less than one year.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Community Action Plan update/report  
☐ Board minutes  
☐ Board pre-meeting materials/packet

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## **Vision and Direction – Category 4: Organizational Leadership**

**Standard 4.5**      The organization has a written succession plan in place for the CEO/ED, approved by the governing board, which contains procedures for covering an emergency/unplanned, short-term absence of 3 months or less, as well as outlines the process for filling a permanent vacancy.

### **Guidance**

- Board approval would most likely occur through a board vote at a regular board meeting
- Documentation must include both elements: 1) plan for emergency/unplanned absence and 2) policy for filling a permanent vacancy.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Board minutes  
☐ Succession plan/policy  
☐ Short term succession plan

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

### Vision and Direction – Category 4: Organizational Leadership

<b>Standard 4.6</b>	<b>An organization-wide, comprehensive risk assessment has been completed within the past 2 years and reported to the governing board.</b>
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## Guidance

- Reporting to the governing board would most likely occur at a regular board meeting and should be reflected in minutes.
- It is important to note that to meet the Standard the organization only has to complete the assessment and report to the board. The results of the assessment are internal to the organization and therefore private.
- There is no one mandatory tool for completing this task. This comprehensive assessment is more than the financial risk assessment contained in the audit and may also include such areas as: insurance, transportation, facilities, staffing, property, etc. To meet the Standard, the tool(s) used needs to address organization-wide functions, not only individual program requirements.

**State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met -The CEE has not met the requirements.

**Documentation used: (Check all that apply)**

- ☐ Risk assessment policy and/or procedures
- ☐ Board minutes
- ☐ Completed risk assessment tool
- ☐ Risk assessment reports

### Other Documentation:

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**If not met, progress to date on meeting the Standard:**

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**Action steps to be taken to meet the Standard:**

**Notes:**

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## Vision and Direction – Category 5: Board Governance

<b>Standard 5.1</b>	<b>The organization’s governing board is structured in compliance with the CSBG Act:</b> <ol style="list-style-type: none"><li><b>1. At least one third democratically-selected representatives of the low-income community;</b></li><li><b>2. One-third local elected officials (or their representatives); and</b></li><li><b>3. The remaining membership from major groups and interests in the community.</b></li></ol>
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### **Guidance**

- This Standard is based on the CSBG Act and addresses the composition structure of the board only.
- See the CSBG Act and IM 82 for comprehensive guidance.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Board minutes
- ☐ Board roster
- ☐ Bylaws

### **Other Documentation:**

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### **If not met, progress to date on meeting the Standard:**

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### **Action steps to be taken to meet the Standard:**

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### **Notes:**

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## Vision and Direction – Category 5: Board Governance

**Standard 5.2**      **The organization’s governing board has written procedures that document a democratic selection process for low-income board members adequate to assure that they are representative of the low-income community.**

### **Guidance**

- See the CSBG Act and IM 82 for comprehensive guidance.
- See definitions list for additional clarity on democratic selection – please note that the CSBG Act requires a democratic *selection* process, not *election* process.
- Examples of democratic selection procedures for low-income sector directors include: (1) election by ballots cast by the CEE’s clients and/or by other low-income people in the CEE’s service area (ballots could be cast, for example, at designated polling place(s) in the service area, at the CEE’s offices, or via the Internet); (2) vote at a community meeting of low-income people (the meeting could serve not simply to select low-income sector directors but also to address a topic of interest to low-income people); (3) designation of one or more community organization(s) composed predominantly of and representing low-income people in the service area (for example, a Head Start policy council, low-income housing tenant association, or the board of a community health center) to designate representative(s) to serve on the CEE’s board.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Board policies and procedures  
☐ Board minutes  
☐ Bylaws

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## Vision and Direction – Category 5: Board Governance

### Standard 5.3

The organization's bylaws have been reviewed by an attorney within the past 5 years.

#### Guidance

- There is no requirement that the attorney be paid
- Final reviews by attorneys on the board or on staff are not recommended, but are not disallowed.

#### State Assessment of Organization:

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

#### Documentation used: (Check all that apply)

- ☐ Board policies and procedures  
☐ Board minutes  
☐ Bylaws

#### Other Documentation:

#### If not met, progress to date on meeting the Standard:

#### Action steps to be taken to meet the Standard:

#### Notes:

## Vision and Direction – Category 5: Board Governance

### **Standard 5.4**

**The organization documents that each governing board member has received a copy of the bylaws within the past 2 years.**

#### **Guidance**

- Distribution may be accomplished through electronic or hard copy distribution.
- Acknowledgment of receipt may be accomplished through a signed and dated written acknowledgement, email acknowledgement, board minutes documenting receipt for those in attendance, etc.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Board minutes  
☐ Board pre-meeting materials/packet  
☐ Bylaws  
☐ List of signatures  
☐ Copies of acknowledgments

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## Vision and Direction – Category 5: Board Governance

<b>Standard 5.5</b>	<b>The organization's governing board meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its bylaws.</b>
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### **Guidance**

- There are no requirements on the meeting frequency or quorum; only that organizations abide by their approved bylaws.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Board minutes
- ☐ Board roster
- ☐ Board bylaws

### **Other Documentation:**

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### **If not met, progress to date on meeting the Standard:**

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### **Action steps to be taken to meet the Standard:**

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### **Notes:**

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## Vision and Direction – Category 5: Board Governance

### **Standard 5.6**

**Each governing board member has signed a conflict of interest policy within the past 2 years.**

#### **Guidance**

- There is no requirement to use a specific conflict of interest policy, only that the organization utilizes one that meets its needs.
- The signed conflict of interest policies are collected, reviewed, and stored by the organization.
- 2 CFR Part 200 (Super Circular) is in effect for any grant periods after December 26, 2014 and has additional information on conflict of interest policies and specific disclosures.
- As a point of reference, the 990 asks: Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise to conflicts? Did the organization regularly and consistently monitor and enforce compliance with the policy? If so, describe how.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Board minutes  
☐ Conflict of interest policy/procedures  
☐ Signed policies/signature list

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## Vision and Direction – Category 5: Board Governance

### **Standard 5.7**

**The organization has a process to provide a structured orientation for governing board members within 6 months of being seated.**

#### **Guidance**

- There is no specific curricula requirement, or training methodology required; Board Orientation should have many organization-specific elements. These may include bylaws, overview of programs, and review of fiscal reports.
- Training may be delivered at board meetings, special sessions, in person, through electronic media, or through other modalities as determined by the board.
- The organization must have documentation of its process (including content), as well as documentation that each board member has been provided with the opportunity for orientation.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Board policy/procedures  
☐ Board training materials  
☐ Board member acknowledgement/signature

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## Vision and Direction – Category 5: Board Governance

### **Standard 5.8**

**Governing board members have been provided with training on their duties and responsibilities within the past 2 years.**

#### **Guidance**

- There is no specific curricula requirement, or training methodology required.
- Training may be delivered at board meetings, special sessions, conferences, through electronic media, or other modalities as determined by the board.
- The organization needs to have documentation that the training occurred (including content) as well as documentation that each board member has been provided with training opportunities.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Training agendas
- ☐ Attendee list
- ☐ Board minutes
- ☐ Documentation of board attendance at offsite training conferences/events/webinars etc.

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## Vision and Direction – Category 5: Board Governance

**Standard 5.9**      **The organization's governing board receives programmatic reports at each regular board meeting.**

### **Guidance**

- This Standard does not require a report on each program at every board meeting; however it does call for some level of programmatic reporting at every board meeting. organizations determine their own process to report programs to the board. For example, some organizations may cycle through their programs semi-annually, others may do so on a quarterly basis, and yet others may do a brief summary at every board meeting.
- Board minutes should reflect that programmatic reports have been received documentation.
- Programmatic reporting may be in writing (reports, dashboards) and/or verbal.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Board minutes  
☐ Board pre-meeting materials/packet  
☐ Programmatic reports

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## Vision and Direction – Category 6: Strategic Planning

<b>Standard 6.1</b>	<b>The organization has an agency-wide strategic plan in place that has been approved by the governing board within the past 5 years.</b>
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### Guidance

- This is intended to be an organization-wide document, not a list of individual program goals
- This would be met through the Board voting on a motion to accept the strategic plan at a regular board meeting and documenting this in the minutes.

### State Assessment of Organization:

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

### Documentation used: (Check all that apply)

- ☐ Board minutes
- ☐ Strategic plan

### Other Documentation:

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### If not met, progress to date on meeting the Standard:

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### Action steps to be taken to meet the Standard:

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### Notes:

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## Vision and Direction – Category 6: Strategic Planning

### **Standard 6.2**

**The approved strategic plan addresses reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient.**

#### **Guidance**

- These are the purposes of CSBG as laid out in the Act.
- These specific terms are not required, but the Plan needs to include one or more of the themes noted in the Standard.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Strategic plan

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## Vision and Direction – Category 6: Strategic Planning

### Standard 6.3

The approved strategic plan contains family, agency, and/or community goals.

#### Guidance

- These goals are set out as part of ROMA, referenced in IM 49, and provide the framework for the National Performance Indicators.
- These specific terms are not required, but the plan must address one or more of these dimensions.
- There is no requirement to address all three: family, agency, and community.

#### State Assessment of Organization:

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

#### Documentation used: (Check all that apply)

- ☐ Strategic plan

#### Other Documentation:

#### If not met, progress to date on meeting the Standard:

#### Action steps to be taken to meet the Standard:

#### Notes:

## Vision and Direction – Category 6: Strategic Planning

### Standard 6.4

**Customer satisfaction data and customer input, collected as part of the community assessment, is included in the strategic planning process.**

#### Guidance

- This Standard links the community assessment with strategic planning.
- There is no requirement to do additional data collection.
- Please see guidance and glossary under Customer Engagement for more information on customer satisfaction and customer input.
- The standard may be documented by references to the analysis of customer satisfaction data and input within the plan, or by including the analysis of customer satisfaction data in the plan or its appendices, with a brief explanation of how it was used.

#### State Assessment of Organization:

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

#### Documentation used: (Check all that apply)

- ☐ Strategic plan including appendices  
☐ Notes from strategic planning process  
☐ Customer satisfaction data/reports  
☐ Customer input data/reports

#### Other Documentation:

#### If not met, progress to date on meeting the Standard:

#### Action steps to be taken to meet the Standard:

#### Notes:



## Vision and Direction – Category 6: Strategic Planning

### Standard 6.5

The governing board has received an update(s) on progress meeting the goals of the strategic plan within the past 12 months.

#### Guidance

- The CSBG Act requires that Boards be involved with assessment, planning, implementation, and evaluation of programs; this standard supports meeting that requirement.
- This standard would be met by an update being provided at a regular board meeting, or a planning session, and documented in the minutes.
- The update provided to the board may be written or verbal.
- The update provided to the board should include goals outlined in the strategic plan and any progress made over the course of the last year, or by another period of time as determined by the board that is less than one year.

#### State Assessment of Organization:

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

#### Documentation used: (Check all that apply)

- ☐ Strategic plan update/report
- ☐ Board minutes
- ☐ Board pre-meeting materials/packet

#### Other Documentation:

#### If not met, progress to date on meeting the Standard:

#### Action steps to be taken to meet the Standard:

#### Notes:

## Operations and Accountability – Category 7: Human Resource Management

### **Standard 7.1**

**The organization has written personnel policies that have been reviewed by an attorney and approved by the governing board within the past 5 years.**

#### **Guidance**

- There is no requirement that the attorney be paid, but should be a currently practicing attorney.
- Final reviews by attorneys on the board or on staff are not recommended, but are not disallowed.
- Note that the review needs to have occurred at some point during in the past five calendar years.
- Agencies may work with human resource professionals (such as SHRM certified staff) and others (attorneys on staff or on the board) prior to the legal review to minimize cost.
- Note that not all attorneys are familiar with Human Resource issues and agencies are encouraged to use attorneys with this type of expertise.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Personnel policies
- ☐ Board pre-meeting materials/packet
- ☐ Board minutes
- ☐ Statement/invoice from an attorney reflecting the review

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## Operations and Accountability – Category 7: Human Resource Management

### **Standard 7.2**

**The organization makes available the employee handbook (or personnel policies in cases without a handbook) to all staff and notifies staff of any changes.**

#### **Guidance**

- The Handbook may be made available in electronic (such as an agency intranet, a location on a shared server, or distributed via email) or print formats.
- The process for notification of changes is up to the individual organization.
- Agencies are encouraged to have staff sign off that they have received and read the Employee Handbook.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Employee handbook/personnel policies  
☐ Identified process for notifying staff of updates  
(may be included within the handbook/policy)  
☐ Documentation of location and availability of  
handbook/policies

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## Operations and Accountability – Category 7: Human Resource Management

**Standard 7.3**      **The organization has written job descriptions for all positions, which have been updated within the past 5 years.**

### **Guidance**

- This references job descriptions for each type of position, not each staff person.
- To meet the Standard, job descriptions may include date of last review/update; the Standard does not require changes when descriptions are reviewed.
- The time frame is defined as within the past 5 calendar years.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Organizational chart/staff list  
☐ Job descriptions  
☐ Board or committee minutes noting documents have been updated

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## Operations and Accountability – Category 7: Human Resource Management

### **Standard 7.4**

**The governing board conducts a performance appraisal of the CEO/executive director within each calendar year.**

#### **Guidance**

- There is no specific appraisal tool required to be used.
- This may be accomplished through a committee or the full board; however, the full board should receive and accept via board vote the appraisal, with the acceptance reflected in the board minutes.
- The approval of the performance appraisal is often done in conjunction with setting the CEO compensation.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Board minutes

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## Operations and Accountability – Category 7: Human Resource Management

### **Standard 7.5**

**The governing board reviews and approves CEO/executive director compensation within every calendar year.**

#### **Guidance**

- The full board should review and approve the total compensation at a regular board meeting and have it reflected in the board minutes.
- This includes salary, fringe, health and dental insurance, expense/travel account, vehicle, etc.
- As a point of reference, the 990 asks: Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision?...and if yes, describe the process.
- The compensation review and approval often happens in conjunction with the CEO performance appraisal.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Board minutes
- ☐ Executive Director/CEO contract (if applicable)

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## Operations and Accountability – Category 7: Human Resource Management

### **Standard 7.6**

**The organization has a policy in place for regular written evaluation of employees by their supervisors.**

#### **Guidance**

- The Standard calls for a policy being in place.
- It is recognized that it is best practice to have annual reviews for every employee, but the Standard is not intended to imply that 100% of employees must have an annual review. This caveat is noted given normal business conditions that may impact individual employees at any given time, e.g. timing of resignation/dismissal, FMLA leave, seasonal, etc.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Evaluation process/policy  
(likely found in personnel policies and procedures)

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## Operations and Accountability – Category 7: Human Resource Management

### **Standard 7.7**

**The organization has a whistleblower policy that has been approved by the governing board.**

#### **Guidance**

- Once the whistleblower policy is approved and in place, there is no requirement for additional review under this Standard. It is good policy for boards to periodically review their whistleblower policy to ensure that they are operating in compliance with it.
- This would be met through a vote by the board at a regular meeting and noted in the minutes.
- Many organizations incorporate their whistleblower policy into their Personnel Policies or Employee Handbook. If not included, the Whistleblower policy should be made available to staff via other means.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Whistleblower policy  
☐ Board minutes  
☐ Board pre-meeting materials/packet

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**



## Operations and Accountability – Category 7: Human Resource Management

**Standard 7.8**      **All staff participate in a new employee orientation within 60 days of hire.**

### **Guidance**

- There are not curricula requirements for the orientation; it is up to the organization to determine the content. Some examples of content include time and effort reporting, ROMA, data collection, mission, history of Community Action, etc.
- This may be met through individual or group orientations, and documented in personnel files.
- The date of hire is considered to be the first day the employee works at the organization.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Personnel policies/employee handbook  
☐ Orientation materials  
☐ Sampling of HR/personnel files for documentation of attendance

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## Operations and Accountability – Category 7: Human Resource Management

**Standard 7.9**      **The organization conducts or makes available staff development/training (including ROMA) on an ongoing basis.**

### **Guidance**

- There are no specific requirements for training topics, with the exception of ROMA (or comparable system if one is used and approved by the State).
- This Standard may be met through in-house, community-based, conference, online and other training modalities. Agencies may conduct their own training in-house, or may make online or outside training available to staff.
- This should be documented in personnel files.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Training plan(s)  
☐ Documentation of trainings: presentations, evaluations, attendee lists  
☐ Documentation of attendance at offsite training events/conferences  
☐ HR/personnel files

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## Operations and Accountability – Category 8: Financial Operations and Oversight

**Standard 8.1**      **The Organization’s annual audit (or audited financial statements) is completed by a Certified Public Accountant on time in accordance with Title 2 of the Code of Federal Regulations, Uniform Administration Requirements, Cost Principles, and Audit Requirement (if applicable) and/or State audit threshold requirements.**

### **Guidance**

- Please see and follow state and federal guidance related to audits.
- Completed by a Certified Public Accountant on time in accordance with Single Audit Guidelines.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Completed audit

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## Operations and Accountability – Category 8: Financial Operations and Oversight

<b>Standard 8.2</b>	<b>All findings from the prior year’s annual audit have been assessed by the organization and addressed where the governing board has deemed it appropriate.</b>
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### **Guidance**

- This Standard can be met through board discussion and decisions at a regular board meeting with decisions noted in the minutes.
- Findings are those noted in the Audit itself, not the Management Letter.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Completed audit
- ☐ Management response to the audit
- ☐ Board minutes

### **Other Documentation:**

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### **If not met, progress to date on meeting the Standard:**

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### **Action steps to be taken to meet the Standard:**

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### **Notes:**

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## Operations and Accountability – Category 8: Financial Operations and Oversight

### **Standard 8.3**

**The organization's auditor presents the audit to the governing board.**

#### **Guidance**

- The presentation to the board should be reflected in the Minutes.
- This Standard can be met via the auditor meeting with the full board or appropriate committee including Finance, Finance/Audit, Audit, or Executive. If done via committee, a report to the full board by the Committee Chair to confirm the meeting occurred needs to be completed and documented in the minutes.
- The Auditor may make the presentation in person or via web or conference call as allowed by state law. In addition, ensure that the bylaws allow for electronic communication if the auditor or their representative presents in this way.
- The presentation may be made by a representative(s) of the audit firm and is not required to be the Partner of the firm engaged in the audit.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Completed audit
- ☐ Board minutes/committee minutes
- ☐ Board pre-meeting materials/packet

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## Operations and Accountability – Category 8: Financial Operations and Oversight

### **Standard 8.4      The governing board formally receives and accepts the audit.**

#### **Guidance**

- This Standard can be met through a board vote accepting the audit at a regular board meeting and reflected in the minutes.
- Each board member should be provided a copy of the audit, either in hard or electronic format, with this distribution noted in the board minutes.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Completed audit
- ☐ Board minutes

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## **Operations and Accountability – Category 8: Financial Operations and Oversight**

### **Standard 8.5**

**The organization has solicited bids for its audit within the past 5 years.**

#### **Guidance**

- The Standard does not require that an organization switch auditors or partners, only that the audit is put out to bid within the past 5 years.
- If an organization is currently under contract with a firm that has been conducting the audit for 5 or more at the time of the first Standards assessment, the bid process needs to occur as soon as the current contract is completed.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Organization procurement policy
- ☐ documentation of bid process, including rfp/rfq, list of vendors receiving notice, proof of any publication of the process
- ☐ Board pre-meeting materials/packet

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## **Operations and Accountability – Category 8: Financial Operations and Oversight**

### **Standard 8.6**

**The IRS Form 990 is completed annually and made available to the governing board for review.**

#### **Guidance**

- The IRS Form 990 is a publically available document, and specifically asks if the board has reviewed the document prior to its submission. It also asks for a description of the review process.
- The Standard would be met by documenting the review process in the board minutes; the Standard does not require board acceptance or approval of the IRS Form 990.
- The IRS Form 990 can be made available by sharing a copy electronically or in hard copy to governing board members with the process noted in the minutes.
- The IRS Form 990 should be completed and submitted on time to the IRS within any granted extension periods.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ IRS Form 990  
☐ Board minutes  
☐ Board pre-meeting materials/packet  
☐ Documentation of 990 distribution to the board (mail, email, link)

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**



## Operations and Accountability – Category 8: Financial Operations and Oversight

### **Standard 8.7**

The governing board receives financial reports at each regular meeting that include the following:

1. Organization-wide report on revenue and expenditures that compares budget to actual, categorized by program; and
2. Balance sheet/statement of financial position.

### **Guidance**

- Categorization by program does not require reporting by individual funding stream; it may be by organization-defined program areas, e.g., Early Childhood, Energy, Housing, etc.
- This does not limit the financial information a board receives at each board meeting. Individual agencies are likely to determine that additional information is needed by the board and should determine what specific information needs to be shared with the board beyond that included in the Standard.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Financial reports as noted above  
☐ Board minutes/committee minutes  
☐ Board pre-meeting materials/packet

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## **Operations and Accountability – Category 8: Financial Operations and Oversight**

### **Standard 8.8**

**All required filings and payments related to payroll withholdings are completed on time.**

#### **Guidance**

- This includes: federal, state, and local taxes; as well as insurance and retirement payments.
- Documentation may include information received from a payroll service if used or the organization's financial management system. Such verification could be reviewed at the committee level if the organization determines it necessary, or delegated to the Executive Director.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Payroll tax documentation/filings
- ☐ Insurance documentation (health, disability, flex accounts)
- ☐ Retirement accounts documentation
- ☐ Record of payments to state, federal, insurance and retirement accounts

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## **Operations and Accountability – Category 8: Financial Operations and Oversight**

### **Standard 8.9      The governing board annually approves an organization-wide budget.**

#### **Guidance**

- This would be met through approval at a regular board meeting and documented in the board minutes.
- This is intended to complement, not replace, program budgets.
- It is recognized that each grant or program will likely have an annual budget that may cross two organizational fiscal years.
- It is important to note that an organization-wide budget is a forecast for the upcoming organization fiscal year, based on the best information at the time of development. It provides the board with an overview of what the expected revenues and expenditures are likely to be over the course of a year, with the knowledge that the actual revenue and expenditures may differ. There is no requirement for the organization to pass a modified organization-wide budget during the course of a year as things change.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Agency-wide budget
- ☐ Board minutes
- ☐ Board pre-meeting materials/packet

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## Operations and Accountability – Category 8: Financial Operations and Oversight

### **Standard 8.10**

**The fiscal policies have been reviewed by staff within the past 2 years, updated as necessary, with changes approved by the governing board.**

#### **Guidance**

- This would be met through approval at a regular board meeting and documented in the board minutes.
- There are no requirements for which specific staff need to be involved in the staff-level review.
- The annual reporting of the staff level review of the fiscal policies may be made at a fiscal committee meeting with the committee minutes reflecting the review.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Fiscal policies/procedures manual  
☐ Board minutes/committee minutes  
☐ Board pre-meeting materials/packet

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## Operations and Accountability – Category 8: Financial Operations and Oversight

**Standard 8.11**      **A written procurement policy is in place and has been reviewed by the governing board within the past 5 years.**

### **Guidance**

- This would be met through approval at a regular board meeting and documented in the board minutes.
- The procurement policy may be found in an organization's fiscal policies; it does not need to be a separate document.
- The procurement policy must be compliant with federal regulations and Agencies are encouraged to review relevant OMB circulars for specifications.

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Procurement policy  
☐ Board minutes  
☐ Board pre-meeting materials/packet

### **Other Documentation:**

### **If not met, progress to date on meeting the Standard:**

### **Action steps to be taken to meet the Standard:**

### **Notes:**

## **Operations and Accountability – Category 8: Financial Operations and Oversight**

### **Standard 8.12**

**The organization documents how it allocates shared costs through an indirect cost rate or through a written cost allocation plan.**

#### **Guidance**

- If no approved indirect cost rate is in place, the organization must have a written cost allocation plan.
- A Federally Negotiated Indirect Cost Rate should be currently approved and may be determined or provisional.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Cost allocation plan
- ☐ An approved indirect cost rate

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## Operations and Accountability – Category 8: Financial Operations and Oversight

<b>Standard 8.13</b>	<b>The organization has a written policy in place for record retention and destruction.</b>
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### **Guidance**

- This includes the retention and destruction of both electronic and physical documents.
- This Policy may be a stand-alone policy or may be part of a larger set of organization policies.
- As a point of reference, the 990 asks: Did the organization have a written document retention and destruction policy?

### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

### **Documentation used: (Check all that apply)**

- ☐ Document retention and destruction policy

### **Other Documentation:**

--

### **If not met, progress to date on meeting the Standard:**

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### **Action steps to be taken to meet the Standard:**

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### **Notes:**

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## Operations and Accountability – Category 9: Data and Analysis

### Standard 9.1

The organization has a system or systems in place to track and report client demographics and services customers receive.

#### Guidance:

- Some funders require their own systems be used; the organization may or may not have an organization-wide system in place. As long as all services and demographics are tracked, this standard would be met.
- The CSBG Information Survey data report already requires the reporting of client demographics. This standard does not require additional demographic data collection or reporting.

#### State Assessment of Organization:

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

#### Documentation used: (Check all that apply)

- ☐ CSBG Information Survey data report
- ☐ Data system documentation and/or direct observation
- ☐ Reports as used by staff, leadership, board or cognizant funder

#### Other Documentation:

#### If not met, progress to date on meeting the Standard:

#### Action steps to be taken to meet the Standard:

#### Notes:



## Operations and Accountability – Category 9: Data and Analysis

### Standard 9.2

The organization has a system or systems in place to track family, agency, and/or community outcomes.

#### Guidance

- Some funders require their own systems be used; the organization may or may not have an organization-wide system in place. As long as outcomes are tracked, this Standard would be met.
- This may or may not be the same system(s) noted in 9.1

#### State Assessment of Organization:

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

#### Documentation used: (Check all that apply)

- ☐ Data system documentation and/or direct observation
- ☐ Reports as used by staff, leadership, board or cognizant funder

#### Other Documentation:

#### If not met, progress to date on meeting the Standard:

#### Action steps to be taken to meet the Standard:

#### Notes:

## Operations and Accountability – Category 9: Data and Analysis

### **Standard 9.3**

**The organization has presented to the governing board for review or action, at least within the past 12 months, an analysis of the agency's outcomes and any operational or strategic program adjustments and improvements identified as necessary.**

#### **Guidance**

- This standard would be met through board or staff discussions as long as the analysis and discussion are documented.
- It is important to note that an organization is likely to have multiple programs with varying program years. This standard addresses an annual review of organization outcomes. Organizations are likely to make operations and strategic program adjustments throughout the year, making a single point in time analysis less effective than ongoing performance management.
- Organizations can meet this standard by having: an annual board discussion of organization outcomes, multiple conversations over the course of the year, or other process the organization deems appropriate as long as these discussions are reflected in the minutes, with any operational or program adjustments or improvements being noted.
- Organizations are not required to make adjustments in order to meet the standard, only to have conducted an analysis.

#### **State Assessment of Organization:**

- ☐ Met-The CEE has met the requirements of the Standard as written.  
☐ Not Met –The CEE has not met the requirements.

#### **Documentation used: (Check all that apply)**

- ☐ Strategic plan update/report  
☐ Other outcome report  
☐ Notes from staff analysis  
☐ Board minutes  
☐ Board pre-meeting materials/packet

#### **Other Documentation:**

#### **If not met, progress to date on meeting the Standard:**

#### **Action steps to be taken to meet the Standard:**

#### **Notes:**

## Operations and Accountability – Category 9: Data and Analysis

### Standard 9.4

**The organization submits its annual CSBG Information Survey data report and it reflects client demographics and organization-wide outcomes.**

#### Guidance

- See CSBG State Lead Agency for specifics on the submission process.
- The CSBG Information Survey data report already requires the reporting of client demographics and organization-wide outcomes. This standard does not require additional data collection or reporting.

#### State Assessment of Organization:

- ☐ Met-The CEE has met the requirements of the Standard as written.
- ☐ Not Met –The CEE has not met the requirements.

#### Documentation used: (Check all that apply)

- ☐ CSBG Information Survey data report
- ☐ Email or upload documentation reflecting submission
- ☐ Backup documentation gathered agency-wide to support the IS submission

#### Other Documentation:

#### If not met, progress to date on meeting the Standard:

#### Action steps to be taken to meet the Standard:

#### Notes:



## **COMMUNITY SERVICE BLOCK GRANTS (CSBG) POLICIES AND PROCEDURES**

### **Appendix 12**

### **Draft Hawaii State Assessment and OCS Response**



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**

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JAN 19 2017

Ms. Joy K. Kobayashi  
Program and Evaluation Administrator  
Office of Community Services  
Department of Labor and Industrial Relation  
830 Punchbowl St., Room 420  
Honolulu, HI 96813

Dear Ms. Kobayashi:

Enclosed is a copy of the draft report of the Hawaii Community Services Block Grant (CSBG) State Assessment review conducted by the Administration for Children and Families (ACF) Office of Community Services (OCS) from September 22, 2014 through September 26, 2014. This draft report is submitted to you for a 30-day review and comment period before the report is issued in final form.

I want to extend my appreciation to you and your staff for your patience and cooperation throughout the review. We recognize that there has been a substantial time between the State Assessment team visit and the report. We apologize for the delay and request that you provide any necessary updates on State actions related to findings in the report as part of your comments.

Please submit comments on the draft report to David Barrie, Financial Operations Team; Branch Chief, [David.Barrie@acf.hhs.gov](mailto:David.Barrie@acf.hhs.gov) or telephone (202) 205-3589 within 30 days of receipt of this letter. If we do not receive a response from the State within 30 days, OCS will consider the report final.

Sincerely,

Jeannie L. Chaffin  
Director  
Office of Community Services

Enclosure



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DEPARTMENT OF HEALTH & HUMAN SERVICES  
Administration for Children and Families  
Office of Community Services

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## **Community Services Block Grant**

### ***Hawaii State Assessment***

### ***On-Site Review***

DRAFT

(September 22 – 26, 2014)

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# HAWAII STATE ASSESSMENT

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# **Hawaii Community Services Block Grant**

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## **I. Executive Summary**

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### **Background**

The Community Services Block Grant (CSBG) provides assistance to States and local communities working through a network of Community Action Agencies (CAAs) and other neighborhood-based organizations for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals to become fully self-sufficient. CSBG-funded activities create, coordinate, and deliver a broad array of services to low-income Americans. The grant's purpose is to fund initiatives to change conditions that perpetuate poverty, especially unemployment, inadequate housing, poor nutrition, and lack of educational opportunity.

The Governor of Hawaii designated the Hawaii State Office of Community Service (HOCS) as the appropriate lead agency for the administration of CSBG. The Hawaii CSBG provides funding, technical assistance, and support to four eligible entities serving five counties for the eight major islands. The eligible entities provide an array of services according to the Community Action Plan formulated to address local needs. Services may include housing, energy assistance, nutrition, employment, and training, as well as transportation, family development, child care, health care, emergency food and shelter, domestic violence prevention services, money management, and micro-business development.

The information contained in this report was compiled during a State Assessment (SA) of Hawaii's CSBG and its eligible entities as evaluated by Federal staff of the Division of Community Assistance (DCA) in the Office of Community Services (OCS), an office within the Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS).

### **State Assessment Authority**

SAs are conducted to examine the implementation, performance, compliance, and outcomes of a State's CSBG and to certify that the State is adhering to the provisions set forth in Title II – Community Services, of the Coats Human Services Reauthorization Act, Public Law 105-285. As per the CSBG statute, the SA examines the State and its eligible entities assurances of program, fiscal and governance operations, as well as the States oversight procedures for its eligible entities.

### **Scope of Review**

On May 5, 2014, OCS issued Information Memorandum (IM) 134, *CSBG State Assessment Schedule FY 2014* explaining that DCA would conduct an on-site monitoring visit of Hawaii during Federal Fiscal Year (FFY) 2014. OCS Federal staff conducted the on-site review of the Hawaii CSBG and its eligible entities from September 22 – 26, 2014.



## **Methodology**

OCS reviewed documented procedures and practices for administrative, fiscal, and program operations from Fiscal Year (FY) 2012 through FY 2013, and interviewed Hawaii State officials responsible for administering CSBG.

OCS reviewers:

- Evaluated compliance of State-level assurances, administrative, fiscal, program, and governance requirements.
- Evaluated the State's monitoring procedures and practices to determine eligible entities compliance with the State-level assurances.

## **II. Hawaii State Assessment Findings and Recommendations**

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OCS identified noncompliance in the administrative, financial, and program areas of Hawaii's CSBG. Section 676 and 678B of the CSBG Act requires the State to provide assurances that funds made available through the grant will be used for the purposes of the Act, and that the State perform the necessary monitoring reviews of eligible entities and assure proper disbursement of and accounting of Federal funds.

### **Finding One:**

#### **Noncompliance in Fiscal Control and Accounting Procedures**

HOCS did not have adequate fiscal control and accounting procedures in place to permit the preparation of the Office of Management and Budget (OMB) Standard Form (SF) 425 Federal Financial Reports (FFR), and permit the tracing of CSBG funds from the Federal government to FY 2012 expenditures.

#### **Federal Financial Reports (SF-425)**

For the FY 2012 (October 1, 2011 – September 30, 2013) grant award period, HOCS did not submit the FFRs in accordance with Federal regulations. For the first annual report, due December 30, 2012, HOCS submitted the FFR to HHS September 18, 2014, almost two years past the required submission date. The final FFR, due December 29, 2013 was submitted almost one year past the submission date. In addition, both reports were submitted with accounting errors. Note: OCS reviewed the FFRs submitted for FY 2013 and FY 2014 and found the FFRs to be in the same condition as the FY 2012 reports. Both FFRs were submitted past the required submission date and with accounting errors.

45 CFR §92.40, §92.41, and §96.30(a), respectively, require that after the close of each statutory period for the obligation of block grant funds and after the close of each statutory period for the expenditure of block grants, each grantee shall report to the Department a financial summary using OMB SF 425 FFR. Grantees are required to submit the information on the FFRs within 90 days of the close of the applicable statutory grant periods. Fiscal control and accounting procedures must be in place to permit the preparation of the FFRs and the tracing of Federal funds to a level of expenditure adequate to establish that funds have not been used in violation of the restrictions and prohibitions of the statute.

This finding was reported in Hawaii's FY 2012 A-133 single audit as a significant deficiency. Hawaii's corrective action plan for the A-133 report stated that the deficiency would be corrected by March 2013; however, during the time of our review, the deficiencies were still outstanding.

#### **Tracing CSBG Funds to a Level of Expenditure**

OCS was not able to trace the drawdown of CSBG funds from the Federal government to HOCS line item expenditures for FY 2012. Section 678D(a)(b) requires the State to establish fiscal control and fund accounting procedures necessary to assure the proper disbursement of and accounting for Federal funds paid to the State. 45 CFR §96.30(a)(b) requires that fiscal control and accounting procedures be sufficient to permit the tracing of funds to a level of expenditure adequate to establish that CSBG funds have not been used in violation of the restrictions and prohibitions of the statute.

OCS sampled CSBG drawdowns for December 2011 and March 2012, and compared them against the cash requested by the eligible entities, and HOCS monthly disbursements. The December 2011 and March 2012 drawdowns totaled \$933,866.47; however, HOCS accounting records showed \$487,820.08 was requested and disbursed to its eligible entities. During the course of our review, HOCS provided multiple iterations of their FY 2012 cash request and disbursement spreadsheets in order to provide support for CSBG expenditures but none of the versions provided matched the total amount drawn down. Consequently, we were not able to trace the remaining balance of \$446,046.39 to a level of expenditures adequate to establish that CSBG funds have not been used in violation of the restrictions and prohibitions of the statute.

### **Carry Over of CSBG Funds**

Under the terms and conditions of the FY 2012 grant award, grantees shall adhere to a provision of law under the Consolidated Appropriations Act of 2005 which requires that to the extent FY 2012 CSBG funds are distributed by a State to an eligible entity, and have not been expended by such eligible entity, they shall remain with such eligible entity for carryover and expenditure into the next fiscal year. If FY 2012 funds are carried forward by such eligible entity into FY 2013, those funds must be fully expended and services provided on or before September 30, 2013.

OCS found that for FY 2012, HOCS carried forward \$846,839 into FY 2013. However, HOCS could not provide documentation and support that the funds were fully expended and services were provided by its eligible entities on or before September 30, 2013.

OCS found that CSBG funds were not being expended by the end of the 24 month grant period. A review of HOCS policy and practice show that the eligible entities are allowed to carryover CSBG funds into the following grant Federal period. Furthermore, HOCS monitoring report noted that one of its eligible entities continues to carry a large portion of CSBG funds from year to year; beyond the 24 month grant period.

### **Single Audit (A-133) Corrective Action**

HOCS did not comply with Federal regulations which require corrective action be taken within six months after receipt of the A-133 single audit report in instances of noncompliance with Federal laws and regulations.

OCS reviewed HOCS A-133 single audit report for the year ending June 30, 2012 to determine whether timely and appropriate corrective action was taken in instances of noncompliance with Federal laws and regulations. OCS noted instances of noncompliance with CSBG Federal laws and regulations include the untimely submission of FFRs and cash management deficiencies. HOCS' corrective action plan stated that the deficiencies would be corrected by March 2013; however, at the time of this review the deficiencies were still outstanding.

### **Recommendations:**

OCS recommends the following actions to address the procedural weaknesses in HOCS Fiscal Control and Accounting Procedures:

- 1.1 HOCS should develop a training plan to address the preparation of the FFRs, and HOCS fiscal and accounting procedures to assure the proper disbursement of and accounting for Federal funds paid to the State;
- 1.2 HOCS should submit the FFRs in a timely manner as required by Federal regulations;
- 1.3 HOCS should discontinue the practice of allowing its eligible entities to carry forward CSBG funds from year to year without proper budget and contract reconciliation to assure that funds are expended within the two-year Federal grant period;
- 1.4 HOCS should develop procedures to account for any CSBG funds carried forward into the next fiscal year to ensure that the funds are fully expended and services are provided by its eligible entities before the end of the Federal grant period; and
- 1.5 HOCS should take appropriate corrective action to resolve the year-end June 30, 2012, A-133 single audit instances of noncompliance.

## **Finding Two:**

### **Procedural weaknesses in the Administration and Oversight of CSBG**

OCS identified procedural weaknesses in the administration and oversight of Hawaii's CSBG in the following areas:

#### **State Application and Plan**

Section 676(a)(2)(A) and Section 676(b)(1-13) requires the lead agency develop the State Plan to be submitted to the Secretary. The plan shall be submitted not later than 30 days prior to the beginning of the first fiscal year covered by the plan, and contain assurances that funds made available through the grant will be used for the reduction of poverty, revitalization of low income communities, and empowerment of low-income families to become fully self-sufficient.

HOCS initially submitted the FYs 2013 – 2014 State Application and Plan to OCS August 31, 2012, prior to holding the public and legislative hearings, certifying to the CSBG assurances, and a narrative description of how the Tripartite Boards requirement would be implemented. OCS requested HOCS resubmit a complete State Application and Plan so as to not delay CSBG funding. HOCS resubmitted the State Plan October 9, 2012; however, it was after the beginning of the first fiscal year covered by the plan.

#### **Corrective Action, Termination and Reduction of Funding**

Per Section 678C, if the State determines, on the basis of a final decision that an eligible entity fails to comply with the terms of an agreement, or the State plan, to provide services...or to meet appropriate standards, goals, and other requirements established by the State, the State shall;

- (1) inform the entity of the deficiency to be corrected; and
- (2) require the entity to correct the deficiency.

OCS found HOCS did not establish definitive timeframes or develop alternatives to correct deficiencies when an entity failed to meet State and Federal requirements. HOCS' monitoring report

noted that fiscal accuracy was an area of great concern for one of its eligible entities. The monitoring report stated that the fiscal accuracy concern had “immediate and direct effect on the ability of the agency to make decisions at both the policy and management levels;” however, the fiscal issues remain unresolved. Another agency had outstanding Office of Inspector General (OIG) fiscal issues that remain unresolved.

Although OCS determined that HOCS was working with the entities to correct the deficiencies, there is a need to establish formalized and timely procedures for corrective action.

### **Child Support Referrals**

According to Section 678G(b), during each fiscal year for which an eligible entity receives a grant such entity shall: (1) inform custodial parents in single-parent families that participate in programs, activities, or services...about the availability of child support services; and (2) refer eligible parents to the child support offices of State and local governments.

HOCS did not have sufficient procedures in place to assure eligible entities inform custodial parents in single-parent families about the availability of child support services and refer eligible parents to the child support offices of State and local governments. OCS noted HOCS did not track the requirement in the monitoring reports, and there was no guidance regarding child support referrals in the policy and procedures manual.

### **Recommendations:**

OCS recommends the following course of action to address procedural weaknesses in the administration and oversight of Hawaii’s CSBG:

- 2.1 HOCS should hold the public hearings in accordance with Section 676(a)(2)(A) and Section 676(b)(1-3) of the CSBG Act and before submitting the State Plan to OCS by the deadline;
- 2.2 HOCS should develop formalized procedures and establish definite time frames to correct deficiencies when an eligible entity fails to meet State and Federal requirements; and
- 2.3 HOCS should establish procedures for the eligible entities to inform custodial parents and families about the availability of child support services, and track the requirement during the State monitoring reviews.

### **III. Hawaii State Assessment**

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OCS's overall State Assessment of Hawaii found noncompliance with the CSBG statute in administrative, fiscal, and program operations.

#### **ADMINISTRATIVE OPERATIONS**

##### **Designation of Lead Agency**

Section 676(a) of the CSBG statute requires each State to designate a lead agency to administer CSBG. The lead agency shall develop the State plan, hold public and legislative hearings, and provide oversight of the eligible entities.

The Governor of Hawaii designated the HOCS as the lead agency to administer CSBG.

##### **Public/Legislative Hearings**

Section 676(a)(2)(B) requires a public hearing with, among other provisions, sufficient time for public comment, and Section 676(a)(3) states that in order to be eligible to receive a grant or allotment the State shall hold at least one legislative hearing every three years in conjunction with the State Plan.

HOCS held the public and legislative hearing for the FYs 2013 – 2014 State Plan October 2, 2012. Documentation provided by the State show that notification of the hearings was published in local newspapers, mailed to eligible entities, and the draft State Plan was made available for public inspection on HOCS's official website August 31, 2012. (*See Finding 2 – State Application and Plan.*)

##### **State Application and Plan**

Section 676(a)(2)(A) and Section 676(b)(1-13) requires the lead agency develop the State Plan to be submitted to the Secretary. The Plan shall be submitted no later than 30 days prior to the beginning of the first fiscal year covered by the plan, and contain assurances that funds made available through the grant will be used for the reduction of poverty, revitalization of low income communities, and empowerment of low-income families to become fully self-sufficient.

HOCS initially submitted the FYs 2013 – 2014 State Plan to OCS August 31, 2012, prior to holding the public and legislative hearings, certifying to the CSBG assurances, and a narrative description of how the Tripartite Boards requirement would be implemented. (*See Finding 2 – State Application and Plan.*)

##### **Community Action Plan and Community Needs Assessment**

Section 676(11) requires States to secure a Community Action Plan that includes a Community Needs Assessment for the community served from each eligible entity within the State, which may be coordinated with Community Needs Assessments conducted for other programs.

In accordance with the Section 676(11), each of Hawaii's eligible entities developed a Community Action Plan (CAP) that included a Community Needs Assessment (CNA) for the communities they served. The CAP serves as the basis for the annual CSBG application and plan, providing quantitative and qualitative data for HOCS' use in developing short- and long-term strategies to meet the needs of the areas served.

The HOCS CSBG program manager reviews the CAP and CNA, and compares the statistical and narrative data with prior work of the eligible entities to determine whether they accurately reflect the extent and nature of poverty in Hawaii's four counties. According to HOCS, the CAPs and CNAs are built on prior plans as the underlying causes and nature of poverty in Hawaii have not changed markedly over the past several years.

### **Administrative and Discretionary Use of Funds**

Section 675C(2) Administrative Cap – No State may spend more than the greater of \$55,000, or 5 percent, of the grant for administrative activities, including monitoring activities. Funds to be spent for such expenses shall be taken from the portion of the grant after the State makes grants to eligible entities. Section 675C(b)(1) Use of the Remainder – the State shall use the remainder of the grant or allotment received for discretionary purposes.

The chart below shows HOCS Administrative and Discretionary expenditures in FY 2013.

<b>FY 2013 CSBG Funds Expended: (Hawaii)</b>		
	<b>Amount Expended</b>	<b>Expended Percent (%) of Total CSBG Allocation</b>
State Administrative Costs	\$167,009	4.6%
Discretionary	\$109,386	3.0%
Total	\$276,395	7.6%

*\*\*Source: FY 2013 CSBG-IS Report*

#### Administrative Funds

In FY 2013, HOCS reported administrative expenditures of \$167,009 (4.6 percent) of the CSBG grant award. Largely, these administrative funds supported salary costs of HOCS staff performing grant management activities such as policy development, program coordination, on-site monitoring, and training and technical assistance. OCS tested a sample of administrative costs in the amount of \$40,648. OCS determined that the expenses were properly supported with signed and approved timecards. OCS was unable to trace these expenditures to the Hawaii general ledger activity as all HOCS costs were aggregated by the department. Furthermore, OCS was unable to trace these costs to a specific drawdown of Federal funds. *(See Finding 1 – Tracing CSBG funds to a level of expenditure.)*

#### Discretionary Funds

In FY 2013, HOCS reported CSBG discretionary expenditures of \$109,386 (3 percent) in actual discretionary costs. The majority of CSBG Discretionary funds are used for direct support of eligible entities including, the purchase of software licenses, specific program support, and Training

and Technical Assistance (T/TA). All recipients of CSBG funds, or State eligible entities, can apply for T/TA grants. OCS tested a sample of discretionary costs in the amount of \$24,135. OCS determined that the expenses were properly supported and entered in the spreadsheets used by HOCS to track funds within the department. However, OCS was unable to trace the discretionary expenditures to the Federal funds drawdown.

Due to the inability to trace all Federal funds to the specific expenditures, OCS reviewers could not determine that HOCS is in compliance with spending limitations for administrative and discretionary funds. OCS did note that the costs aggregated by HOCS are properly supported and appeared to be for the administration and furtherance of CSBG objectives. *(See Finding 1 – Tracing CSBG funds to a level of expenditure.)*

## Monitoring

Section 678B(a) requires States to monitor local agencies to determine whether they meet performance goals, administrative standards, and financial management requirements, as well as other requirements of the State. The State shall conduct the following reviews of eligible entities: 1) full onsite review of each entity at least once during a 3-year period, 2) onsite review of each newly designated entity immediately after completion of the first year in which the entity received CSBG funds; and 3) follow-up reviews to eligible entities that fail to meet the goals, standards, and requirements established by the State.

OCS found HOCS performed the required monitoring reviews of its eligible entities in accordance with Section 678B(a). The table below shows HOCS monitoring schedule and activity during a three-year period.

*The Table below illustrates Hawaii monitoring schedule of its eligible entities.*

Monitoring Schedule		
Agency Name	On-site Visits	Counties Served
Honolulu Community Action Program	12/13/2012	Honolulu
Kauai Economic Opportunity Inc.	09/23/2012	Kauai
Hawaii County Economic Opportunity Council	02/20/2013	Hawaii
Maui Economic Opportunity, Inc.	10/24-25/2011	Maui

## Training and Technical Assistance

Section 675C(b)(1)(A) allows States to use CSBG funds to provide T/TA to those entities in need of such training and assistance. Section 678C(a)(3) indicates states shall offer T/TA if appropriate to help correct eligible entities deficiencies.

In FY 2012, HOCS provided its eligible entities \$10,000 of its discretionary funds for T/TA, and offered individualized assistance to correct deficiencies in financial management and accounting and Tripartite Board development.



## **Corrective Action, Termination, and Reduction of Funding**

Per Section 678C(a), “if the State determines, on the basis of a final decision, that an eligible entity fails to comply with the terms of an agreement, or the State plan, to provide services...or to meet appropriate standards, goals, and other requirements established by the State, the State shall;

- (1) inform the entity of the deficiency to be corrected;
- (2) require the entity to correct the deficiency;
- (3) (A) offer training and technical assistance, if appropriate to help correct the deficiency, and prepare and submit to the Secretary a report describing the training and technical assistance offered;
- (B) if the State determines that such training and technical assistance are not appropriate, prepare and submit to the Secretary a report stating the reasons for the determination;...”

OCS found HOCS did not establish definite time frames or develop alternatives to correct deficiencies when an entity failed to meet State and Federal requirements. (*See Finding 2 – Corrective Action.*)

## **FINANCIAL OPERATIONS**

### **Fiscal Controls and Audits**

#### **Fiscal Controls**

45 C.F.R. § 96.30(a) requires States to maintain fiscal control and accounting procedures. Except where otherwise required by Federal law or regulation, a State shall obligate and expend block grant funds in accordance with the laws and procedures applicable to the obligation and expenditure of its own funds. Fiscal control and accounting procedures must be sufficient to; (a) permit preparation of reports required by the statute, and (b) permit the tracing of funds to a level of expenditure adequate to establish that such funds have not been used in violation of the restrictions and prohibitions of the statute authorizing the block grant.

HOCS did not have sufficient fiscal controls and accounting procedures to permit the preparation of the FFRs and permit the tracing of funds to a level of expenditure adequate to establish that such funds have not been used in violation of the restrictions and prohibitions of the statute authorizing the block grant. (*See Finding 1 for more information related to the accounting for Federal funds.*)

#### **Audits**

According to 45 CFR §96.31, grantees and subgrantees are responsible for obtaining audits in accordance with OMB Circular A-133, “*Audits of State, Local Governments, and Non-Profit Organizations.*” Agencies expending \$500,000 or more of Federal funds in any year must contract with an independent auditor to review their financial statements and Federal expenditures. Section 678D(a)(b) requires the State to establish fiscal control and fund accounting procedures necessary to assure the proper disbursement of and accounting for Federal funds paid to the State ... including procedures for monitoring the funds provided under this subtitle. 45 CFR §96.31 requires that appropriate corrective action is taken within six months after receipt of the audit report in instances of noncompliance with Federal laws and regulations.

### *State Compliance with OMB A-133 (Single Audit)*

In accordance with 45 CFR §96.31 and OMB Circular A-133, Hawaii obtained single audits to review their financial statements and Federal expenditures for June 30, 2012 and June 30, 2013. OCS reviewed the single audits to determine whether timely and appropriate corrective action was taken in instances of noncompliance with Federal laws and regulations. OCS noted instances of noncompliance with CSBG Federal laws and regulations from the single audit report June 30, 2012. *(See Finding 1- A-133 Corrective Action.)*

### *State Monitoring – Eligible Entity Compliance OMB A- 133 (Single Audit)*

In accordance with 45 CFR §96.31 and OMB Circular A-133, Hawaii's eligible entities obtained single audits for Fiscal Year End 2012 and 2013. OCS verified that HOCS monitored the single audits, OCS reviewed the single audits to determine whether timely and appropriate corrective action was taken in instances of noncompliance with Federal laws and regulations. For the single audits reviewed there were no instances of noncompliance with CSBG.

### **Recapture and Redistribution of Unobligated Funds**

Per Section 675C(a)(3), a State may recapture and redistribute unobligated funds in excess of 20 percent of the amount distributed to an eligible entity to another eligible entity or to a private nonprofit organization. However, since 2001, Congressional Appropriation language has provided instruction that supersedes the language in the enabling legislation. Currently, states must comply with annual appropriation instructions requiring that, "to the extent Community Services Block Grant funds are distributed as grants by a State to eligible entities provided under the Act, and have not been expended by such entity, the funds shall remain with such entity for carryover into the next fiscal year for expenditure by such entity for program purposes.

HOCS policy allows carryover funds to be retained by eligible entities in accordance with the Consolidated Appropriations Act of 2005; however, HOCS policy and practice allows CSBG funds to be carried over into the following grant period. *(See Finding 1 – Carryover of CSBG Funds.)*

### **State Carryover**

HOCS carried forward \$846,839 into FY 2013. However, HOCS could not provide documentation and support that the funds were fully expended and services were provided by its eligible entities on or before September 30, 2013. *(See Finding 1 – Carryover of CSBG Funds.)*

### **Federal Financial Report**

45 CFR §92.40, §92.41, and §96.30(b)(4), respectively, the grantee shall submit annual program progress and FFRs using OMB SF 425. The FFRs are due within 90 days of the close of the applicable statutory grant periods.

For the FY 2012 grant award period (October 1, 2011 – September 30, 2013) HOCS did not submit the FFRs in accordance with State and Federal regulations. *(See Finding 1 - Federal Financial Reports.)*

## **PROGRAM OPERATIONS**

### **Use of Ninety (90%) Percent of Funds**

Per Section 672, the purpose and goals of the CSBG is to provide assistance to States and local communities working through a network of community action agencies and other neighborhood organizations, for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient. Section 675 requires that not less than 90 percent of the funds made available to a State shall be used by the State to make grants for the purposes described in Section 672 to eligible entities.

In accordance with Section 672, HOCS reported providing services to 42,043 low-income individuals in 25,697 families. The chart below describes the services provided in FY 2013, which addressed conditions of poverty that create barriers to economic security.

<b>FY 2013 CSBG Use of Funds: Hawaii</b>		
<b>Programs</b>	<b>Amount Expended</b>	<b>Program Goals for Low-income families and individuals</b>
Employment	\$1,257,469	Low-income participants who obtain employment and maintain employment, or become self-employed.
Education	\$667,858	Educational services provided for children and adults.
Income Management	\$21,635	Income management services provide to low-income families and individuals.
Housing	\$133,585	Housing services provided to improve the living environment.
Emergency Service	\$326,981	Services provided for emergencies and crisis intervention.
Nutrition	\$287,016	Nutrition services provided to low-income families and individuals.
Health	\$0	Health care services made accessible to low-income families and individuals.
Self-Sufficiency	\$316,741	Services provided to assist low-income in gaining or increasing economic security.
Linkages	\$262,441	Activities that "link" community members, groups, government, and commercial organizations that serve low-income communities.
Other	\$98,415	\$85,092.04 reported as other personnel costs.
<b>Total FY</b>	<b>\$3,372,141</b>	

**\*\*Source: FY 2013 CSBG-IS Report**

## **Tripartite Boards**

Section 676B requires that members are chosen in accordance with democratic selection procedures to assure that not less than one-third of its members are representatives of low-income individuals and families who reside in the neighborhoods served. One-third of the members of the Board are elected public officials and the remaining members are official or members of business, industry, labor, religious, law enforcement, education, or other major groups interested in the community served. Members must actively participate in the planning, implementation, and evaluation of the program that services their low-income communities.

HOCS requires eligible entities to submit a listing of their Tripartite Board membership prior to being approved to administer CSBG funds. Members are chosen in accordance with democratic selection procedures to assure that not less than one-third of its members are representatives of low-income individuals and families who reside in the neighborhoods served. The remaining members are public officials or members of business, industry, labor, religious organizations, law enforcement, education, or other major groups interested in serving the community. Members must actively participate in the planning, implementation, and evaluation of the program that services their low-income communities.

According to HOCS, for the purposes of monitoring the requirements, the CSBG Program Manager attends periodic board meetings of each of the eligible entities and reviews board minutes. HOCS requires annual certification to ensure the board members have received orientation and/or training that cover, among other topics, a description of their responsibilities and liabilities. The certification is required to be documented in the Board minutes. The requirement is included in the contract signed between the eligible entities and the State, the State's CSBG manual, and the State Plan.

## **Results-Oriented Management and Accountability (ROMA) System and Annual Reporting**

According to Section 678E(1) and 678E(2), each State that received funds shall participate in a performance measurement system and ensure that all eligible entities in the State participate to the extent to which programs are implemented in a manner that achieve positive results for the communities served. States may participate in the model evaluation system designed by OCS in consultation with the CSBG Network called ROMA. Alternatively, States may design their own similar system.

HOCS participates in the ROMA system to measure performance and program outcomes, and report the data to the National Association for State Community Services Programs (NASCS) for inclusion in their Annual Report. HOCS requires all eligible entities to prepare and submit a list of outcome objectives that will be identified and developed following ROMA. HOCS requires staff to monitor the outcome objectives throughout the year through quarterly Program Progress Reports and by on-site visits during the FFY or within three years. According to the State's policy and procedures manual, HOCS staff analyzes outcome objectives which measure eligible entities' performance in promoting self-sufficiency, family stability, and community revitalization. The objectives conform to the performance measures meeting the goals of CSBG. Through a review of the State monitoring documents, OCS verified that HOCS conducts risk assessments to ensure eligible entities comply with HOCS procedures.

## **Annual Report**

Section 678E (2) requires that each State shall annually prepare and submit to the Secretary a report on the measured performance of the State and the eligible entities in the State. In accordance with OCS IM 133, the Annual Report must be submitted to OCS by March 31, 2014 for FY 2013 activities. The report should describe how the State and the eligible entities met its goals and objectives, as well as provide information on the types of projects supported with FY 2013 CSBG funds. The Annual Report must contain performance measurement outcome data which addresses the implementation of the national goals and measures.

Although OCS verified that HOCS submitted performance measurement information to NASCSP for inclusion in the Annual Report, the State did not provide its most recent CSBG Information Survey (IS) submission directly to OCS in accordance with CSBG IM 133. As a future practice, HOCS should submit an electronic copy of the CSBG IS data directly to OCS after completion of the submission to NASCSP, in accordance with CSBG IM 133.

## **Limitation on Use of Funds**

Per Section 678F, grants may not be used by the State or by any other person...for the purchase of improvement of land, or the purchase, construction, or permanent improvement of any building or other facility.

In accordance with CSBG statute, HOCS policy states that eligible entities are prohibited from using CSBG funds for the purchase or improvement of land, or the purchase, construction, or permanent improvement of any building or other facility. The CSBG Act includes a provision for a waiver, but will only be sought when no other viable options exist and services to low-income families and individuals may be jeopardized. OCS found that HOCS was in compliance with Section 678F of the CSBG Act.

## **Child Support Services**

Per Section 678G(b), during each fiscal year for which an eligible entity receives a grant such entity shall: (1) inform custodial parents in single-parent families that participate in programs, activities, or services...about the availability of child support services; and (2) refer eligible parents to the child support offices of State and local governments.

HOCS did not have sufficient procedures in place to inform custodial parents in single-parent families about the availability of child support services; and refer eligible parents to the child support offices of State and local governments. (*See Finding 2 – Child Support Services.*)

## **CONCLUSION**

OCS would like to thank you, the staff, and the eligible entities visited for their cooperation and assistance during the State Assessment of Hawaii. In accordance with Section 678B(c) please provide your responses to the findings and recommendations contained in the report within 30 days after receipt of the draft report. If your responses are not provided within 30 days, and OCS has not received a request for an extension the report will be considered final. If an extension is required the States must provide within 30 days after receipt of the draft report a justification of the circumstances that warrant an extension. After the issuance of a final report, the State will be

required to develop and submit a corrective action plan for Federal review. Staff from OCS and its technical assistance grantees will be available to work with assigned State staff in developing a plan of corrective action. If you have any questions or concerns, please contact:

Seth Hassett  
Director, Division of Community Assistance  
Telephone: (202) 401-4666  
Fax: (202) 401-4694  
E-mail: [Seth.Hassett@acf.hhs.gov](mailto:Seth.Hassett@acf.hhs.gov)

Correspondence may be sent to:  
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Director, Division of Community Assistance  
Administration for Children and Families  
Office of Community Services  
Division of Community Assistance  
330 C Street, SW, 5th Floor  
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## **APPENDICES**

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IN REPLY REFER TO:  
OCS.17.1645

February 24, 2017

Mr. David Barrie, Branch Chief  
Financial Operations Team  
Administration for Children & Families  
Office of Community Services  
Via email: [David.Barrie@acf.hhs.gov](mailto:David.Barrie@acf.hhs.gov)

Subject: **Hawaii Community Services Block State Grant Assessment**

Dear Mr. Barrie:

This letter is in response to the draft report of the "Hawaii Community Services Block Grant (CSBG) State Assessment" received by the Hawaii Office of Community Services (HOCS) on January 30, 2017.

We appreciate the Administration for Children and Families, Office of Community Services' (OCS) recognition that substantial time has passed between the visit by the State Assessment team in September 2014 and the release of the report. HOCS and our administration of CSBG have changed dramatically in that time. Our responses include changes already made and changes to be implemented as corrective action.

**Finding One – Noncompliance in Fiscal Control and Accounting Procedures**

*HOCS did not have adequate fiscal control and accounting procedures in place to permit the preparation of the Office of Management and Budget (OMB) Standard Form (SF) 425 Federal Financial Reports (FFR), and permit the tracing of CSBG funds from the Federal government to FY 2012 expenditures.*

- **Federal Financial Reports (SF-425)** – Currently, the submission of the SF-425 is the responsibility of the assigned HOCS program specialist who works with the fiscal staff to ensure accuracy of the report. The SF-425 for Federal Fiscal Year (FFY) 2016 were submitted on time (15B2HICOSR was submitted on December 23, 2016, and 16B2HICOSR was submitted on December 19, 2016). To date, HOCS has not received any indication that there were any problems with the reports submitted.
- **Tracing CSBG Funds to a Level of Expenditure** – HOCS currently assures the proper disbursement of and accounting for Federal funds by doing the following:
  1. Prior to execution of the CSBG contract, the program specialist reviews the eligible entities' respective budgets to ensure that all expenses are allowable.
  2. During the program year, each cash request and expenditure report from the eligible entities is reviewed by the program specialist to confirm that all expenditures reconcile with the budget and no unallowable expenses have been made.
  3. The fiscal staff processes the request and draws down funds from the appropriate account.
  4. Copies of the checks to the eligible entities and monthly reports of the drawdowns are provided to the program specialist, which are verified with the program specialist's records of expenditures.
- **Carry Over of CSBG Funds** – HOCS now creates separate accounts for each federal grant, which was not the practice at the time of the State Assessment. This practice allows for greater visibility into each grant, improving fiscal management. In addition, HOCS now issues closing letters to each eligible entity at the end of each FFY to ensure that the State and the eligible entity agree on the carry



over amount and that the carry over must be expended within the FFY. The carry over amounts are also specified in each contract. The program specialist tracks the expenditures against the grant year and budget of each eligible entity included in its contract to ensure that the carry over funds are expended in a timely manner

- **Single Audit (A-133) Corrective Action** – We have reviewed the year ending June 30, 2012, A-133 single audit and found that the findings appear to have been corrected.

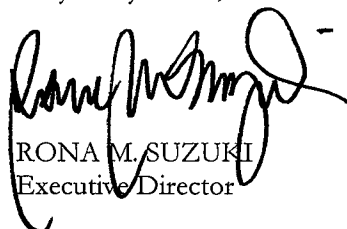
#### **Finding Two – Procedural weaknesses in the Administration and Oversight of CSBG**

*OCS identified procedural weaknesses in the administration and oversight of Hawaii's CSBG in the following areas:*

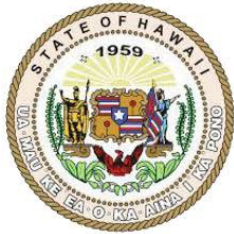
- **State Application and Plan** – The State Plan for FFY16-17 was submitted on August 31, 2015, with the required public and legislative hearing held prior to submission as required, and was accepted by OCS on October 13, 2015. HOCS is required to submit a new State Plan in FFY 2017 for FFY 18-19. HOCS will hold the required public legislative hearing in the beginning of August 2017 after proper review and input from the eligible entities. A schedule has been planned to ensure that the State Plan is submitted on time and as required by statute.
- **Corrective Action, Termination and Reduction of Funding** – Presently, we have not noted any issues with fiscal accuracy with any of the eligible entities. Since the time of the State Assessment, all agencies have updated their accounting software and are able to produce documentation regarding expenses as requested. HOCS has been working closely with the eligible entities to correct any deficiencies as they are identified, both fiscally and programmatically. Training and technical assistance has been provided, as needed or requested. HOCS monitored two agencies in FFY 2016, both had no severely detrimental findings. HOCS will be monitoring the other two agencies in FFY 2017. If the monitoring visits result in findings, HOCS will develop technical assistance plans with deadlines and training and technical support, as needed.  
In regard to the Office of Inspector General reports, we have been trying to work with OCS to resolve the findings. We last inquired about these issues to OCS on February 8, 2017. We would appreciate your assistance with correspondence or Audit Disposition Letters to enable us to fully resolve these issues.
- **Child Support Referrals** – HOCS has reviewed and shared the Community Action Program Legal Services' Q&A document regarding this requirement with our eligible entities. HOCS will monitor for compliance and identify best practices for meeting this requirement.

Thank you for the opportunity to respond to the draft report. We look forward to continuing to work with OCS to improve administration of CSBG in Hawaii and provide better services to the eligible entities and their beneficiaries. If you have any questions, please contact Joy Kobayashi (phone: (808) 586-8631, email: joy.k.kobayashi@hawaii.gov) or me (phone: (808) 586-8678, email: rona.m.suzuki@hawaii.gov).

Very Truly Yours,



RONA M. SUZUKI  
Executive Director



## **COMMUNITY SERVICE BLOCK GRANTS (CSBG) POLICIES AND PROCEDURES**

### **Appendix 13**

#### **Information Memorandum 116 (Corrective Action, Termination, or Reduction of Funding)**

# OFFICE OF COMMUNITY SERVICES

An Office of the Administration for Children & Families

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## CSBG IM No. 116 Corrective Action, Termination, or Reduction of Funding

Published: May 1, 2012

**Audience:** Community Services Block Grants (CSBG)

**Category:** Guidance, Policies, Procedures, Information Memorandums (IM)

**Tags:** authority, guidelines

### **COMMUNITY SERVICES BLOCK GRANT PROGRAM**

#### **Information Memorandum**

**U.S. Department of Health and Human Services**

**Administration for Children and Families**

**Office of Community Services**

**Division of State Assistance**

**370 L'Enfant Promenade, S.W.**

**Washington, D.C. 20447**

**Transmittal No. 116 Date: December 4, 2009 (Revised April 2, 2010)**

#### **TO:**

State Community Services Block Grant Program (CSBG) Administrators, U.S.

Territory CSBG Program Administrators, State CSBG Financial Officers

#### **SUBJECT:**

Guidance on Corrective Action, Termination or Reduction of Funding for CSBG Eligible Entities

#### **PURPOSE:**

To ensure a consistent understanding of legal requirements and procedures for termination or proportional reduction of funding to eligible entities receiving CSBG funds

#### **RELATED REFERENCES:**

Community Services Block Grant Act (Public Law 105-285, the Community Opportunities, Accountability, and Training and Educational Services Act of 1998); U.S. Code of Federal Regulations (45 CFR, Section 96.92).

**This Information Memorandum (IM) provides background on statutory and regulatory requirements for terminating organizational eligibility or otherwise reducing the share of funding allocated to any CSBG-eligible entity. A step-by-step description is provided outlining necessary actions and considerations for terminating or reducing funds to a CSBG-eligible entity for cause. A sample tool is provided for State documentation of State actions. Although described as a series of discrete steps, some activities described in this IM can be implemented concurrently. States are encouraged to review internal monitoring, corrective action, and hearing procedures to assure compliance with the CSBG Act and applicable regulations cited in this memorandum. In addition, States are strongly encouraged to develop tools and procedures for timely action in circumstances requiring corrective action, reduction, or termination of funding to assure accountability and prevent waste, fraud, or abuse of CSBG funds.**

Note: The IM is intended as a guidance tool to support State implementation of requirements of specific sections of the CSBG Act. Key sections of the CSBG Act are referenced throughout the IM. It is strongly recommended that the referenced sections of the CSBG Act be read along with this guidance in order to assure an understanding of the specific language of the statute. The CSBG Act may be obtained online at the OCS website.

## **Background**

CSBG funds are awarded to States, U.S. Territories, and eligible Tribal governments and Tribal Organizations based on a statutorily defined formula outlined in the CSBG Act. States are required under the CSBG Act to distribute at least 90 percent of block grant funds to specific eligible entities within the State to support services focused on the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families in rural and urban areas to become fully self-sufficient.

States may retain up to ten percent of grant funds for administrative expenses (which may not exceed the greater of \$55,000 or five percent of the total State award) and other discretionary activities. For example, if a State receives a CSBG allocation of \$10 million, the State may retain up to \$1 million for discretionary activities, but may not use more than \$500,000 of these funds for administrative expenses.

Eligible entities are non-profit or public agencies that meet the requirements of Section 673(1)(A) and Section 676B of the CSBG Act. Nonprofit eligible entities must administer the CSBG program through a tripartite board, one-third of whom must be elected public officials or their representatives, not-less than one-third of whom must be democratically-selected representatives of low-income families and individuals in the neighborhoods served, and the remainder of whom are officials or members of business, industry, labor, religious, law enforcement, education, or other major groups and interests in the community served.

Public eligible entities must also have a tripartite board, which must assure that not fewer than one-third of the members are democratically-selected representatives of low-income individuals and families in the neighborhood served, reside in the neighborhood served, and are able to participate actively in the development, planning, implementation, and evaluation of programs funded through the CSBG grants. States may also specify an alternate mechanism to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of public entity programs funded under the CSBG grant.

The majority of eligible entities in the CSBG program are Community Action Agencies or public agencies with a longstanding involvement in the CSBG program. The list of eligible entities within a State is generally consistent from year-to-year. States may add or remove organizations from the list of eligible entities but must do so consistent with procedures outlined in the CSBG Act. States award funds to eligible entities based on State-defined formulas. However, any changes that adversely affect the proportional share of funding awarded to an eligible entity must be conducted in accordance with the CSBG Act.

## **Proportional Share Requirements for Eligible Entities**

The CSBG Act requires that as a part of the annual submission of an application and plan for CSBG funding, States must assure that any eligible entity in the State that received funding in the previous fiscal year through a Community Services Block Grant will not have its funding terminated, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction. The CSBG Act also specifies that a State's determination is subject to Federal review by the Department of Health and Human Services. The time lines and procedures for Federal review are discussed later in this IM.

An eligible entity's "proportional share" refers to the amount of non-discretionary grant funds awarded to that entity compared to the amount of non-discretionary grant funds awarded to all eligible entities in the State. For example, if an eligible entity received \$1 million in non-discretionary grant funds in the prior year and the total of all non-discretionary grant funds awarded to all eligible entities in the State in the prior year was \$10 million, the eligible entity's proportional share would be ten percent.

## **Cause for Changes of Proportional Share to Eligible Entities**

Under Section 676(c) of the CSBG Act, there are two major causes for changing the proportional share of funding awarded to eligible entities.

*Statewide Redistribution of Funds* - The first, and most common, cause for changing the proportional share of funding to eligible entities is not related to performance deficiencies of a specific organization. Under Section 676(c)(1)(A) of the CSBG Act, States may implement a Statewide redistribution of funds to respond to the results of the most recently available census data or other appropriate data, the designation of a new eligible entity, or severe economic dislocation. Statewide changes to the distribution formulas require a public hearing. The CSBG Act requires at least one legislative hearing every three years in conjunction with the development of the State plan and States may utilize this legislative hearing to consider changes to distribution formulas. States may also conduct special administrative hearings in response to specific demographic or economic changes, or the designation of a new eligible entity to address an unserved area.

*Failure to Comply with State Plan, Standard or Requirement* - The second cause for reducing funding or terminating eligibility for CSBG funding is related to deficiencies in the activities of an individual eligible entity. Under Sections 676(c)(1)(B) and 676(c)(2) of the CSBG Act, States may reduce funding or terminate eligibility for CSBG funding based on an eligible entity's failure to comply with the terms of an agreement or a State plan, or to meet a State requirement, to provide services, or to meet appropriate standards, goals, and other requirements established by the State, including performance objectives.

## **State Monitoring and Review**

Section 678B(a) of the CSBG Act requires that States conduct monitoring visits and a full on-site review of each eligible entity at least once during each three-year period. The CSBG Act also requires that States conduct an on-site review of each newly-designated entity immediately after the completion of the first year in which the entity receives CSBG funds.

States are required under the regular CSBG program to conduct follow-up reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards, and requirements established by the State. The CSBG Act also requires that States conduct other reviews as appropriate, including reviews of entities with programs that have had other Federal, State, or local grants other than assistance provided under CSBG terminated for cause.

It is an expectation of the Office of Community Services (OCS) that State CSBG Lead Agencies will conduct reviews when informed that an eligible entity has grant funds terminated for cause under a related program, such as Head Start, the Low Income Home Energy Assistance Program (LIHEAP), the Weatherization Assistance Program, or other Federal programs. State CSBG Lead Agencies should include questions in routine monitoring visits and contacts about whether an eligible entity has had grant funds terminated for cause in any Federal, State, or local programs other than CSBG. State CSBG Lead agencies are expected to review the cause of termination for other Federal programs to assure that comparable issues do not exist for CSBG funds.

It is also the expectation of OCS that State CSBG Lead Agencies will thoroughly investigate any instances of “whistleblower” complaints or allegations of fraud or abuse of CSBG funds or funds from closely-related programs. In any instances in which complaints or allegations of fraud are considered credible and raise significant “red flags,” OCS should be informed of findings and may assist with additional compliance review or referral to appropriate investigative authorities.

Note: Allegations of fraud or abuse may also be referred directly to the HHS hotline maintained by the Office of the Inspector General using the following contact information: 1-800-HHS-TIPS (1-800-447-8477) <http://oig.hhs.gov/fraud/hotline/> (<http://oig.hhs.gov/fraud/hotline/>)

#### **Determination of Performance Deficiencies or Failure to Comply with State Requirement**

Based on routine State monitoring, reviews, or investigations related to specific complaints or allegations, the State CSBG office may determine that an eligible entity has failed to comply with the terms of an agreement or a State plan, or to meet a State requirement. The State’s determination may be based on the agency’s failure to provide CSBG services, or to meet appropriate standards, goals, and other requirements established by the State, including performance objectives. The State should document the basis for such determination and the specific deficiency or deficiencies that must be corrected.

#### **Communication of Deficiencies and Corrective Action Requirements**

When a State CSBG Lead Agency has determined that an eligible entity has a specific deficiency, the State must communicate the deficiency to the eligible entity and require the eligible entity to correct the deficiency. To establish compliance with the requirements of the CSBG Act, records of correspondence or other communications related to an enforcement action against an eligible entity should be maintained.

#### **Technical Assistance to Correct Deficiencies**

The State must offer training and technical assistance, if appropriate, to help an eligible entity correct identified deficiencies or failures to meet State requirements. Technical assistance may be offered concurrently with the notification of a deficiency or deficiencies and should focus on the specific issues of the eligible entity to the extent possible.

The CSBG Act requires that the State prepare and submit to the Secretary a report describing the training and technical assistance offered. Alternately, if the State determines that training and technical assistance are not appropriate, the State must prepare and submit a report to the Secretary stating the reasons that technical assistance is not appropriate.

Some examples of situations in which a State may determine that technical assistance is not appropriate may include, but are not limited, to the following:

- A deficiency for which the eligible entity has the expertise and skills available within the organization to make corrective actions without assistance;
- A deficiency for which the State has previously provided technical assistance and the eligible entity has failed to institute corrective actions;
- Multiple, widespread, and/or repeated deficiencies that cannot feasibly be addressed through technical assistance;
- A deficiency that involves evidence of fraudulent reporting or use of funds, or other evidence of criminal wrongdoing.

#### **Quality Improvement Plan**

Section 678C(a)(4) of the CSBG Act allows for State discretion in the implementation of a quality improvement plan by an eligible entity to correct an identified deficiency or deficiencies. The Act specifies that States must consider the seriousness of the deficiency and the time reasonably required to correct the deficiency.

Examples of instances in which a State may exercise discretion on whether a quality improvement plan is appropriate or necessary may include, but are not limited to the following:

- A deficiency for which an eligible entity has previously instituted a corrective action plan and has repeated findings;
- A deficiency that involves evidence of fraudulent reporting or use of funds, or other evidence of criminal wrongdoing and therefore presents a risk requiring immediate action.

If a State determines that an eligible entity should be allowed to develop and implement a quality improvement plan, the CSBG Act requires the State to allow the eligible entity to develop and implement their plan within 60 days after being informed of a deficiency. States are encouraged to review quality improvement plans and issue decisions on whether the plans are approved as quickly as possible within the 30-day time frame. The quality improvement plan should identify actions that will be taken to correct the deficiency within a reasonable period of time as determined by the State. States may exercise discretion based on the specific circumstances.

If a quality improvement plan is allowed, the State must review and issue a decision on whether to approve the plan not later than 30 days after receiving the plan from an eligible entity. If the State does not accept the plan, the State must specify the reasons why the proposed plan cannot be approved.

### **Opportunity for a Hearing**

A key statutory requirement for funding termination or reductions, as outlined in Section 678C(a)(5) of the CSBG Act is that States must provide adequate notice and opportunity for a hearing prior to terminating organizational eligibility for CSBG funding or otherwise reducing the proportional share of funding to an entity for cause. The CSBG Act does not include any State or Federal authority to waive the requirement of an opportunity for a hearing. Hearing procedures should be consistent with any applicable State policies, rules or statutory requirements.

Pursuant to Section 678C(b) of the CSBG Act, OCS shall, upon request, review any final State determination to terminate or reduce funding of an eligible entity. In order to conduct such review, the requestor and State should submit to OCS all necessary documentation relating to the determination, including, for example, transcripts of the hearing and any documentation used in reaching the State's decision. For the purposes of any Federal review, it is suggested that States provide the following information to OCS:

- A copy of the notice provided in advance of the hearing that includes the date of the notice and the date of the hearing;
- The name of the presiding hearing official;
- The name(s) of official(s) or individual(s) responsible for determination of hearing findings or decisions (e.g. the CSBG State Official);
- The names of the individuals participating in the hearing; and
- Documentation of evidence presented at the hearing.

### **State Proceedings to Terminate or Reduce Funding**

After providing an opportunity for a hearing, if the State finds cause for termination or reduction in funding, the State may initiate proceedings to terminate the designation of or reduce the funding to an eligible entity unless the entity corrects the deficiency. If a State CSBG Lead Agency determines that funding will be reduced or that eligibility for CSBG funds will be terminated, the State must notify both the eligible entity and the OCS of the decision.

### **Opportunity for Federal Review**

A Federal review of the State decision to reduce or terminate funding may be initiated through a request from the affected organization. In accordance with 45 CFR §96.92, an eligible entity has 30 days following notification by the State of its final decision to request a review by the Secretary of the Department of Health and Human Services (HHS).

If a request for a review has been made, the State may not discontinue present or future funding until the Department responds to the request. Requests for Federal review must be received by OCS within 30 days of notification of a State decision. If no request for review is made within the 30-day limit, the State's decision will be effective at the expiration of the time.

Section 678C(b) of the CSBG Act specifies that a review by the Department of Health and Human Services shall be completed no later than 90 days after the Department receives from the State all necessary documentation relating to the determination to terminate the designation or reduce the funding. If the review is not completed within 90 days, the Act specifies that the determination of the State shall become final at the end of the 90th day.

### **Expedited Federal Review and Technical Assistance**

While the CSBG Act specifies that a Federal review of State documentation for terminating the designation or reducing funding to an eligible entity must be completed within 90 days, an expedited Federal review may be possible in some instances. This is particularly true in circumstances in which the State has consulted closely with OCS before and during proceedings and has provided documentation at each step of the process as described above. In some instances, particularly those involving potential waste, fraud and abuse, an on-site Federal review may be arranged to expedite the review of documentation and assist with CSBG procedures and requirements. A documentation tool outlining information required for Federal review is included as an attachment to this guidance.

### **Address to Request Federal Review**

Information on how to request a Federal review should be provided to all eligible entities that are subject to a termination or reduction of funding hearing and decision. To ensure that requests are received in time for Federal review, it is strongly recommended that requests be sent via overnight mail with a signed certification of receipt. Requests for review must be sent to the attention of the Division of State Assistance in the Office of Community Services at the following address:

U.S. Department of Health and Human Services  
Administration for Children and Families  
Office of Community Services  
Division of State Assistance

Attention: Community Services Block Grant Program  
370 L'Enfant Promenade S.W., 5th Floor West  
Washington, D.C. 20447

Overnight mail submissions may be sent directly to the assigned Office of Community Services' CSBG Program Services - Regional Contacts to provide notification that a request has been submitted. This contact information is available on the CSBG program website.

### **Potential for Direct Federal Assistance to an Eligible Entity**

Section 678C(c) of the CSBG Act specifies that whenever a State terminates or reduces the funding of an eligible entity prior to the completion of a required State hearing and other statutorily-required considerations and procedures as outlined in this document, the Department of Health and Human Services is authorized to provide financial assistance directly to the eligible entity until the State violation of the CSBG Act requirements is corrected. In such instances, the State's CSBG allocation under the block grant would be reduced by the amount provided to the eligible entity.

### **State Award of Funds to a New Eligible Entity**

In the event that the State terminates the designation of an organization as an eligible entity, or otherwise reduces funds, any resulting funding may be awarded only to an organization that is an eligible entity for CSBG funds. Section 676A of the CSBG Act outlines procedures for designation and re-designation of eligible entities in un-served areas. In accordance with the CSBG Act, a State may solicit applications and designate as an eligible entity either:

- A private nonprofit organization that is geographically located in the un-served area that is capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency and meets the requirements of the CSBG Act; or
- A private nonprofit eligible entity that is geographically located in an area contiguous to or within reasonable proximity of the un-served area and is already providing related services in the un-served area.

States must grant the designation to an organization of demonstrated effectiveness in meeting the goals of the CSBG Act, and may give priority to an eligible entity in a contiguous area that is already providing related services in the un-served area. If no private, nonprofit organization is identified or determined to be qualified as an eligible entity to serve the area, the State may designate an appropriate political subdivision of the State to serve as an eligible entity for the area.

Any nonprofit or public agency receiving CSBG funds must meet the tripartite board requirements specified in Section 676B of the CSBG Act. The process of soliciting applications to select a new eligible entity may take place during the period in which the Department of Health and Human Services is reviewing a State decision to terminate an organization's eligibility for CSBG funds. However, the State may not award the funds to a new eligible entity until the Department confirms the State's finding for cause or the 90-day period for Federal review has passed.

### **Additional Options to Protect Federal Funds**

Although the CSBG Act provides for a specific process for terminating an organization's status as an eligible entity or otherwise reducing an entity's proportional share of funding, States have considerable additional authority to assure appropriate expenditures of Federal funds. Where State laws and procedures permit, States may consider use of cost-reimbursement funding approaches to assure a detailed review of actual expenditures and State approval prior to reimbursement. In some instances, particularly when substantial risks have been identified, States may consider cost reimbursement strategies for some or all funds during a period of corrective action or implementation of a Quality Improvement Plan. While cost reimbursement procedures may be used to assure appropriate expenditure of funds, payment to eligible entities must be made within a reasonable period of time after submission of the reimbursement request and necessary documentation. The Office of Community Services encourages consideration of all applicable State laws and procedures in circumstances in which credible allegations of waste, fraud, or abuse of funds are under formal investigation, but not yet conclusively documented. This may include circumstances in which the office has received whistle-blower complaints, referrals from a State or Federal investigative office, or evidence of misuse of funds in a related Federal or State program.

### **Conclusion**

The appropriate use of CSBG funds is a shared responsibility between the Office of Community Services, State CSBG Lead Agencies, and eligible entities at the community level. The CSBG Act provides protections and responsibilities for organizations at each level. While the procedures for terminating eligibility or reducing funding for cause related to a deficiency are expected to apply to only a small percentage of eligible entities, all State and Federal officials involved with the CSBG program must be familiar with required procedures. It is strongly recommended that State CSBG Lead Agencies work closely with the Office of Community Services at each stage of the process to assure appropriate documentation of the process. The Office of Community Services will work closely with State CSBG Lead Agencies to assure due process for any affected organizations, to assure that procedures are executed efficiently and correctly in instances where warranted to prevent waste, fraud and abuse, and to promote the appropriate and effective use of funds to alleviate the causes and conditions of poverty in communities nationwide.

In the supplemental appropriation for the American Recovery and Reinvestment Act of 2009 (Public Law 111-5), States were instructed to award 99% of appropriated funds to eligible entities.

Procedures for designating a new eligible entity are outlined in Section 676A of the CSBG Act.

\_\_\_\_\_/s/\_\_\_\_\_  
Yolanda J. Butler, Ph.D.  
Acting Director  
Office of Community Services

Attachment:  
Sample Documentation Tool for Corrective Actions, Reductions, or Terminations of CSBG Funding For Cause

**ATTACHMENT Sample Documentation Tool  
for Corrective Actions, Reductions, or  
Terminations of CSBG Funding For Cause**

*The table provided below may be used by State CSBG Lead Agencies to assure appropriate documentation at each stage of the required process for corrective action, termination, or reduction of funding for organizational deficiencies. Some steps may be instituted concurrently and documentation (e.g. reports or correspondence) may include multiple steps. For example, a State may notify an eligible entity of deficiencies, offer appropriate technical assistance, and require a plan of correction within a single item of correspondence. The statutory requirements are described here as a series of discrete steps in order to assure that all key requirements are documented. Highlighted notes provided below are intended as a guidance regarding appropriate documentation and may be removed in an actual working document.*

**Community Services Block Grant (CSBG) Legislative Requirement – Section 678C**

**Activities Undertaken by the State with respect to the Eligible Entity in Compliance with Section 678C**

**Documentation in the Proceedings**

**Step 1:** State conducts review pursuant to section 678B.

§678C(a), 42 U.S.C. §9915(a)

*Describe the review dates, procedures, key participants.*

*Cite monitoring reports, working papers, or key correspondence.*

**Step 2:** State determines, on the basis of a final decision in a review pursuant to section 678B, that an eligible entity fails to comply with the terms of an agreement, or the State plan, to provide services under this subtitle or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives).

§678C(a), 42 U.S.C. §9915(a)

*Describe the basis for State determination.*

*Cite monitoring reports, working papers, and key correspondence relevant to State determination.*

**Step 3:** State informs the entity of the deficiency to be corrected.

§678C(a)(1), 42 U.S.C. §9915(a)(1)

*Describe the dates and method of notification.*

*Cite relevant correspondence, meeting notes and other documentation of communication.*

**Step 4:** State requires the entity to correct the deficiency.

§678C(a)(2), 42 U.S.C. §9915(a)(2)

*Describe communication of State requirements, any associated deadlines or documentation requirements for eligible entities.*

*Cite relevant correspondence, meeting notes and other documentation of communication.*



**Step 5:** State determines whether training and technical assistance are appropriate.

§678C(a)(3)(B), 42 U.S.C. §9915(a)(3)(B)

*Describe the rationale for determining whether training and technical assistance are appropriate to correct the deficiency. If training and technical assistance are not appropriate describe the basis for this determination.*

*Cite meeting notes and other documentation of communication.*

**Step 6 (if appropriate):** State offers training and technical assistance, if appropriate, to help correct the deficiency.

§678C(a)(3)(A), 42 U.S.C. §9915(a)(3)(A)

*If applicable, describe the document the State's offer of training and technical assistance offered to correct the deficiency.*

*Cite relevant correspondence, meeting notes and other documentation of communication.*

**Step 7:** State either (A) prepares and submits to the Secretary a report describing the training and technical assistance offered; or (B) *if the State determines that such training and technical assistance are not appropriate, prepares and submits to the Secretary a report stating the reasons for the determination.*

§678C(a)(3), 42 U.S.C. §9915(a)(3)

*Provide a report documenting either:*

- *the specific training and technical assistance offered; or*
- *the State rationale for not providing technical assistance*

*If training and technical assistance is offered, document whether the offer was accepted, when training and/or technical assistance was provided, and whether it was successful in addressing the deficiency.*

*Note: In instances in which training and/or technical assistance are provided and the eligible entity successfully addresses the deficiency, the State should maintain documentation and may provide to the Office of Community Services for future reference.*

*Cite report submitted to HHS.*

**Step 8 (Discretionary):** At the discretion of the State (taking into account the seriousness of the deficiency and the time reasonably required to correct the deficiency), the State allows the entity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan to correct such deficiency within a reasonable period of time, as determined by the State; and not later than 30 days after receiving from an eligible entity a proposed quality improvement plan, either approve such proposed plan or specify the reasons why the proposed plan cannot be approved.

§678C(a)(4), 42 U.S.C. §9915(a)(4)

*Maintain documentation of any quality improvement plans, State deadlines to correct identified deficiencies, whether or not the State approves the quality improvement plan.*

*Note: In instances in which a quality improvement plan is implemented and the deficiency is corrected, the State should maintain documentation and may provide to the Office of Community Services for future reference.*

*Cite Quality Improvement Plans – If Applicable*

**Step 9:** State provides adequate notice and an opportunity for a hearing.

§678C(a)(5), 42 U.S.C. §9915(a)(5)

*Describe, communication to eligible entity regarding the opportunity for a hearing, date of communication, and any applicable State policies, rules, or procedures.*

*If applicable, describe conduct of hearing to present and consider evidence relevant to State determination consistent.*

*If applicable, describe outcomes or findings of hearing.*

*Cite correspondence or public communication regarding the date and procedures for hearing.*

*If applicable, cite documentation of the hearing, including official minutes or record of the presiding hearing official, official(s) or individual(s) responsible for determination of hearing findings or decisions; a list of individuals participating in the hearing; evidence presented at the hearing; and any outcomes or findings.*

**Step 10:** State initiates proceedings to terminate the designation of or reduce the funding under this subtitle of the eligible entity unless the entity corrects the deficiency.

§678C(a)(5), 42 U.S.C. §9915(a)(5)

*Notification to eligible entity and HHS of State decision to terminate or reduce funding.*

*Upon request, OCS review of State determination.*

*Designation or redesignation of eligible entity to serve un-served areas in accordance with CSBG Act.*

*Cite official correspondence to eligible entity and HHS.*

*If applicable, cite OCS approval or disapproval of State decision.*

1 In the supplemental appropriation for the American Recovery and Reinvestment Act of 2009 (Public Law 111-5), States were instructed to award 99% of appropriated funds to eligible entities.

2 Procedures for designating a new eligible entity are outlined in Section 676A of the CSBG Act.

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## **COMMUNITY SERVICE BLOCK GRANTS (CSBG) POLICIES AND PROCEDURES**

### **Appendix 14**

## **CAA & OCS Requirement Reference Guide**

# CAA & OCS Requirement Reference Guide

## CAA Requirements

<u>Requirement</u>	<u>Frequency</u>	<u>Citation</u>
Minutes from Tripartite Board	Each meeting	CSBG Act Sec. 676B
Fiscal Report	Monthly	Contract
Program Report	Quarterly	Contract
CSBG Annual Report data	Upon receipt of SmartForms by OCS and due to OCS by date set before March 31 annually	CSBG Act Sec. 678E
Organizational Standards self-assessment	Annually and during on-site monitoring visits	IM 138
Final Fiscal Report	Nov. 30 annually	Contract
Agency-wide Audit	Annually	OMB Uniform Guidance and Contract
Community Action Plan	Annually	Organizational Standards and Contract
On-Site monitoring	At least once every 3 years	CSBG Act Sec. 678B
Community Needs Assessment	3 years	CSBG Act Sec. 676(b)(11) and Organizational Standards
Strategic Plan	5 years	Organizational Standards

## OCS Requirements

<u>Requirement</u>	<u>Frequency</u>	<u>Citation</u>
Allocation to CAAs (may require contract amendment for final allocation)	Upon receipt of award	State Plan
Estimated allocation to CAAs for contracting	Upon receipt of final award	State Plan and Chapter 103F, HRS
Management Decision for audit	Within 6 months of receipt of audit	2 CFR 200.521
Review of Fiscal Reports	Monthly	OMB Uniform Guidance and 2 CFR 305(3)
Review of Program Reports	Quarterly	State Accountability Measures – Data Collection
CSBG Annual Report	March 31 annually	CSBG Act Sec. 678E
Review of Organizational Standards	Annually	IM 138

Risk Assessment of CAAs	June 1 annually	2 CFR 205
Execute contract	Oct. 1 annually	Chapter 103F, HRS and CSBG Act Sec. 675C(a)
Final Fiscal Report (SF-425)	Dec. 29 annually	45 CFR 96.30
State Plan	Aug. 31 annually	CSBG Act Sec. 676
On-Site Monitoring	Each CAA at least once every 3 years	CSBG Act Sec. 678B