DRAFT VERSION 5/15/15

Community Services Block Grant (CSBG) New York State Plan for Federal Fiscal Year 2016 and Federal Fiscal Year 2017

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Mandatory Grant Application SF-424

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SECTION 1
Designation of Lead Agency and Official State Designation Letter

1.1. Lead Agency designated to administer CSBG in the State, as required by Section 676(a) of the Act. The following information should mirror the information provided in the SF-424M.

1.1a. Agency Name **[Narrative, 2500 Characters]**

New York State Department of State

1.1b. Identify the cabinet or administrative department of this Agency **[Check One]**

- ☐ Community Services Department
- ☐ Human Services Department
- ☐ Social Services Department
- ☐ Governor's Office
- ☐ Community Affairs Department
- ☒ Other, describe: Division of Community Services

1.1c. Name the division, bureau, or office of the CSBG Authorized Official **[Narrative, 2500 Characters]**

Secretary of State

1.1d. Authorized Official of Lead Agency **[Narrative, 2500 Characters]**

Cesar A. Perales, Secretary of State, New York State Department of State

Instructional note: The Authorized Official could be the Director, Secretary, Commissioner etc. as assigned in the designation letter.

1.1e. Street Address **[Narrative, 2500 characters]**

One Commerce Plaza
99 Washington Avenue, Suite 1100

1.1f. City **[Narrative, 2500 characters]**

Albany

1.1g. State **[Dropdown]**

New York

1.1h. Zip **[Narrative, 5 characters]**

12231-0001

1.1i. Telephone Number and Extension **[Narrative, 10 – 15 characters which includes option for 5 digit extension]**

(518) 474-0050

1.1j. Fax Number **[Narrative, 10 characters]**

(518) 474-4765

1.1k. Email Address **[Narrative, 2500 characters]**

dos.sm.dcs@dos.ny.gov

1.1l. Website **[Narrative, 2500 characters]**

www.dos.ny.gov

1.2. Please provide the following information in relation to the designated State CSBG Contact.

Instructional Note: The State CSBG Contact should be the person that will be the main point of contact for CSBG within the State.

1.2a. Agency Name **[Narrative, 2500 characters]**

New York State Department of State, Division of Community Services

1.2b. Point of Contact **[Narrative, 2500 characters]**

Veronica Cruz, Director, Division of Community Services

1.2c. Street Address **[Narrative, 2500 characters]**

One Commerce Plaza, 99 Washington Avenue, Suite 1020

1.2d. City **[Narrative, 2500 characters]**

Albany

1.2e. State **[Dropdown]**

New York

1.2f. Zip **[Narrative, 5 characters]**

12231-0001

1.2g. Telephone Number **[Narrative, 10 – 15 characters which includes option for entering up to 5 digit extension]**

(518) 474-5741

1.2h. Fax Number **[Narrative, 10 characters]**

(518) 486-4663

1.2i. Email Address **[Narrative, 2500 characters]**

dos.sm.dcs@dos.ny.gov

1.2j. Website **[Narrative, 2500 characters]**

www.dos.ny.gov/dcs/index.htm

1.3. Please attach the State's official designation letter. If either the governor or designated agency has changed, please update the letter. **[Attach a document]**

See Attachment 1: Response to Section 1.3 – Designation Letter

Instructional Note: The letter should be from the chief executive officer of the State and include the designated State CSBG Lead Agency, the designated State CSBG Official who is to receive the CSBG grant award, the CSBG Contact Person, and complete addresses and contact information for the agency and individuals.

SECTION 2
State Legislation and Regulation

2.1. **CSBG State Legislation** Does the State have a statute authorizing CSBG? ☒ Yes ☐ No

2.2. **CSBG State Regulation** Does the State have regulations for CSBG? ☒ Yes ☐ No

2.3. Attach a copy (or copies) of legislation and/or regulations, as appropriate. **[Attach a document]**

See Attachment 2: Response to Section 2.3 – New York State Executive Law Article 6-D and 19 NYCRR Parts 700 and 701

2.4. **State Authority:** Please select a response for each question about the State statute and/or regulations authorizing CSBG:

2.4a. Did the State legislature enact authorizing legislation, or amendments to an existing authorizing statute, last year? ☐ Yes ☒ No

2.4b. Did the State establish or amend regulations for CSBG last year? ☐ Yes ☒ No

2.4c. Does the State statutory or regulatory authority designate the bureau, division, or office in the State government that is to be the State administering agency? ☒ Yes ☐ No

SECTION 3
State Plan Development and Statewide Vision and Goals

3.1. CSBG Lead Agency Mission and Responsibilities: Briefly describe the mission and responsibilities of the State agency that serves as the CSBG Lead Agency. **[Narrative, 2500 characters]**

The mission and responsibility of the Department of State (DOS) as lead agency is to work in partnership with the community services network of grantees as well as Federal, State, and local governments, and community- based organizations to effectively carry out the purposes, goals, and assurances of the CSBG Act and CSBG Program. Adherence to the mission and responsibilities of DOS, as lead agency, is addressed and ensured in several ways, including through: program and fiscal monitoring; certification of eligible entities' capacity to meet statutory requirements; provision of training and technical assistance to ensure agencies that require additional assistance are provided the same; coordinating and forming partnerships with other organizations serving low-income residents; and coordinating and establishing linkages between governmental and other social services programs to assure effective delivery of services. In carrying out the mission of the CSBG Act, the State has elected to use the maximum allowable poverty line percentage (125%) as a criterion of eligibility for CSBG funded services and programs.

3.2. State Plan Vision and Goals: Describe the State's vision (which encompasses the use of CSBG and CSBG-specific goals under this State Plan. **[Narrative, 2500 characters]**

Note: This information is associated with State Accountability Measure 1Sa (i) and may pre-populate the State's annual report form.

Vision and Goals

New York State envisions that programs will be administered in accordance with the CSBG statutory purposes and goals and in compliance with all applicable State and Federal statutes, rules, regulations, policies and procedures. The following goals guide operation:

Goal 1: Funds will be distributed in a timely manner and in accordance with applicable Federal and State statutes.

Goal 2: A comprehensive onsite review of each eligible entity will be conducted at least once every three years in accordance with § 678B of the CSBG Act. The reviews will be based in part on the newly designed organizational standards. Training and technical assistance will be provided to insure that 100% of grantees can meet new Federal organizational standards.

Goal 3: CSBG funds will be coordinated with governmental and other social services programs to assure effective delivery of services and to avoid duplication.

Goal 4: A comprehensive report will be prepared documenting the use and outcomes of CSBG funds and will be submitted to the U.S. Department of Health and Human Services (HHS), Governor Andrew M. Cuomo, and the New York State Legislature annually as prescribed by Federal and State statute.

3.3. State Plan Development: Indicate the information and input the State accessed to develop this State Plan.

3.3a. Analysis of **[Check all that applies and add narrative where applicable]**

- ☒ State National Performance Indicators (NPIs)
- ☒ U.S. Census data
- ☒ State performance management data (e.g., accountability measures, other information from annual reports) Annual Program Report
- ☐ Other data (please describe)
- ☒ Eligible entity community assessments
- ☒ Eligible entity plans
- ☒ Other information from eligible entities, e.g., State required reports (please describe) Requests for training and technical assistance submitted by eligible entities as part of DOS monitoring and comprehensive triennial assessments.

3.3b. Consultation with **[Check all that applies and add narrative where applicable]**

- ☒ Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)
- ☒ State community action association and regional CSBG T & TA providers
- ☒ State partners and/or stakeholders (please describe) CSBG Advisory Council
- ☒ National organizations (please describe) NASCSP and CAP
- ☒ Federal Office of Community Services
- ☐ Other (please describe) _____

3.4. Eligible Entity Involvement

3.4a. Describe the specific steps the State took in developing the State Plan to involve the eligible entities. **[Narrative, 2500 Characters]**

Note: This information is associated with State Accountability Measures 1Sa (ii) and may pre-populate the State's annual report form.

On December 8, 2014 and March 31, 2015, DOS solicited feedback from CSBG Advisory Council members and grantees via meetings held in-person and over video conference. The CSBG Advisory Council consists of Community Action Agency (CAA) executive directors and leaders of not-for-profit organizations, social service agencies and members representing the public. Council meetings are open to the public and to all CAAs and participation is encouraged. In addition, a draft of the Plan was posted on the public DOS website and publically noticed. The draft Plan was also shared with the New York State Community Action Association (NYSCAA), which encourages the network to provide comment on the plan. Finally, an email informing the entire CAA network and all discretionary grantee providers of the draft Plan was sent by DOS on May 29, 2015.

If this is the first year filling out the automated State Plan, please skip the following question.

3.4b. Performance Management Adjustment: How has the State adjusted State Plan development procedures under this State Plan, as compared to past plans, in order 1) to encourage eligible entity participation and 2) to ensure the State plan reflects input from eligible entities? Any

adjustment should be based on the State's analysis of past performance in these areas, and should consider feedback from eligible entities, OCS, and other sources. If the State is not making any adjustments, please explain. **[Narrative, 2500 Characters]**

Note: This information is associated with State Accountability Measures 1Sb(i) and (ii) and may pre-populate the State's annual report form.

SECTION 4
CSBG Hearing Requirements

4.1. **Public Notice/Hearing** Describe how the State made this State plan or revision to the State plan available for public inspection, as required under Section 676(e)(2) of the Act. **[Narrative, 2500 Characters]**

Pursuant to the requirements of § 676(e)(2) of the Federal CSBG Act, the draft New York State CSBG State Plan and Application FFY 2016 and FFY 2017 was posted on the DOS official website at http://www.dos.ny.gov/dcs/news.htm, with notice posted in the New York State Register on June 3, 2015.

In addition, DOS transmitted the draft Plan to eligible entities within the State of New York, to all current CSBG grantees, to the New York State Community Action Association, Inc. (NYSCAA), and to all members of the CSBG Advisory Council via email. The public, including the community action network, was afforded a period of 60 days to submit written comment. All comments received were considered by the State in finalizing this Plan.

4.2. **Public Notice/Hearing** Describe how the State ensured there was sufficient time and statewide distribution of notice of the hearing(s) to allow the public to comment. **[Narrative, 2500 Characters]**

In addition to discussing the State Application Plan with the CSBG Advisory Council members, the draft State Plan was distributed prior to the official public and legislative hearing. DOS sent notice by email to all current CSBG grantees, CSBG Advisory Council Members, and other stakeholders announcing the release of the draft Application and State Plan and notice of date, time and location of the public and legislative hearing. A notice announcing the hearing was posted in the State Register and on the New York State Department of State website.

4.3. Specify the date(s) and location(s) of the public and legislative hearing(s) held by the designated lead agency for this State plan, as required under 676(a)(2)(B) and 676(a)(3) of the Act. (If the State has not held a public hearing in the prior fiscal year or a legislative hearing in the last three years, please provide a complete explanation).

Instructional Note: Please note the date(s) for the public hearing(s) must have occurred in the year prior to the first Federal fiscal year covered by this plan. Legislative hearings are held at least every three years, and must have occurred within the last three years prior to the first Federal Fiscal Year covered by this plan.

Date	Location	Type of Hearing [Select and option]
June 3, 2015	**Hearing Room C** **Legislative Office Building,** **Albany, NY**	☐ Public ☐ Legislative ☒ Combined
ADD a ROW function Note: you will be able to add a row for each additional hearing		

4.4. Attach supporting documentation for the public and legislative hearings. **[Attach a document]**

See Attachment 3: Response to Section 4.4 – Supporting Documentation for the Public and Legislative Hearings

[To Be Included in Final Submission]

- State Register
- Email communication with CSBG funded entities
- Public Hearing Reply Form

SECTION 5
CSBG Eligible Entities

5.1. CSBG Eligible Entities: In the table below, list each CSBG-funded eligible entity in the State, and indicate public or private, the type of agency, and the geographical area served.

CSBG Eligible Entity	Public or Nonprofit	Type of Agency (choose all that apply)	Geographical Area Served
[Narrative, 2500 characters]	**[Select Public or Nonprofit]**	☒ CAA ☐ Limited Purpose Agency ☒ Migrant or Seasonal Farmworker Organization ☐ Tribe	**[Narrative, 2500 characters]**
ADD a ROW function Note: you will be able to add a row for each eligible entity funding in the State			

CSBG Eligible Entity	*Public or Nonprofit*	*Type of Agency*	*Geographical Area Served*
Albany County Opportunity, Inc.	Nonprofit	CAA	Albany County
Allegany County Community Opportunities and Rural Development, Inc.	Nonprofit	CAA	Allegany County
Opportunities for Broome, Inc.	Nonprofit	CAA	Broome County
Cattaraugus Community Action, Inc.	Nonprofit	CAA	Cattaraugus County
Cayuga/Seneca Community Action Agency, Inc.	Nonprofit	CAA	Cayuga and Seneca Counties
Chautauqua Opportunities, Inc.	Nonprofit	CAA	Chautauqua County
Economic Opportunity Program, Inc. of Chemung County	Nonprofit	CAA	Chemung and Schuyler Counties
Opportunities for Chenango, Inc.	Nonprofit	CAA	Chenango County
Joint Council for Economic Opportunity of Clinton and Franklin Counties, Inc.	Nonprofit	CAA	Clinton and Franklin Counties
Columbia Opportunities, Inc.	Nonprofit	CAA	Columbia County
Cortland County Community Action Program, Inc.	Nonprofit	CAA	Cortland County
Delaware Opportunities, Inc.	Nonprofit	CAA	Delaware County
Dutchess County Community Action Agency, Inc.	Nonprofit	CAA	Dutchess County
Community Action Organization of Erie County, Inc.	Nonprofit	CAA	Erie County
Adirondack Community Action Programs, Inc.	Nonprofit	CAA	Essex County
Fulmont Community Action Agency, Inc.	Nonprofit	CAA	Fulton and Montgomery Counties
Community Action of Greene County, Inc.	Nonprofit	CAA	Greene County
Community Action Planning Council of Jefferson County, Inc.	Nonprofit	CAA	Jefferson County
Lewis County Opportunities, Inc.	Nonprofit	CAA	Lewis County
Livingston County Board of Supervisors (Community Initiatives Council)	Public	CAA (Public Eligible Entity)	Livingston County
Community Action Program for Madison County, Inc.	Nonprofit	CAA	Madison County
Action for a Better Community, Inc.	Nonprofit	CAA	Monroe and Ontario Counties
Economic Opportunity Commission of Nassau County, Inc.	Nonprofit	CAA	Nassau County
Niagara Community Action Program, Inc.	Nonprofit	CAA	Niagara County
New York City Department of Youth and Community Development	Public	CAA (Public Eligible Entity)	New York City
Mohawk Valley Community Action Agency, Inc.	Nonprofit	CAA	Oneida and Herkimer Counties
People's Equal Action and Community Effort, Inc.	Nonprofit	CAA	Onondaga County
Regional Economic Community Action Program, Inc.	Nonprofit	CAA	Orange County (including City of Newburgh)
Community Action of Orleans and Genesee, Inc.	Nonprofit	CAA	Orleans and Genesee Counties
Oswego County Opportunities, Inc.	Nonprofit	CAA	Oswego County
Opportunities for Otsego, Inc.	Nonprofit	CAA	Otsego County

Commission on Economic Opportunity for the Greater Capital Region, Inc.	Nonprofit	CAA	Rensselaer County
PathStone Corporation	Nonprofit	Migrant or Seasonal Farmworker Organization	Statewide
Saratoga County Economic Opportunity Council, Inc.	Nonprofit	CAA	Saratoga County
Schenectady Community Action Program, Inc.	Nonprofit	CAA	Schenectady County
Schoharie County Community Action Program, Inc.	Nonprofit	CAA	Schoharie County
Pro Action of Steuben and Yates, Inc.	Nonprofit	CAA	Steuben and Yates Counties
St. Lawrence County Community Development Program, Inc.	Nonprofit	CAA	St. Lawrence County
Economic Opportunity Council of Suffolk, Inc.	Nonprofit	CAA	Suffolk County
Community Action Commission to Help the Economy, Inc.	Nonprofit	CAA	Sullivan County
Tioga Opportunities, Inc.	Nonprofit	CAA	Tioga County
Tompkins Community Action, Inc.	Nonprofit	CAA	Tompkins County
Ulster County Community Action Committee, Inc.	Nonprofit	CAA	Ulster County
Warren-Hamilton Counties Action Committee for Economic Opportunity, Inc.	Nonprofit	CAA	Warren and Hamilton Counties
Washington County Economic Opportunity Council, Inc.	Nonprofit	CAA	Washington County
Wayne County Action Program, Inc.	Nonprofit	CAA	Wayne County
Westchester Community Opportunity Program, Inc.	Nonprofit	CAA	Westchester, Putnam and Rockland Counties
Wyoming County Community Action, Inc.	Nonprofit	CAA	Wyoming County
Yonkers Community Action Program, Inc.	Nonprofit	CAA	Yonkers (City of)

5.2 Total number of CSBG eligible entities: __49__ **[This will automatically update based on chart in 5.1]**

5.3 **Changes to Eligible Entities list:** Has the list of eligible entities under item 5.1 changed since the State's last State Plan submission? If yes, please briefly describe the changes. ☒ Yes ☐ No
[If yes is selected – narrative, 2500 characters]

On August 1, 2014, the Regional Economic Community Action Program was designated as the eligible entity for provision of services to the City of Newburgh, New York.

SECTION 6
Organizational Standards

Organizational Standards for CSBG eligible entities

Note: The information below is associated with State Accountability Measure 6Sa and b; these responses may pre-populate the State's annual report form.

6.1. Please check the box that applies. If using alternative standards, please a) attach the complete list of alternative organizational standards, b) describe the reasons for using alternative standards, and c) provide evidence that the standards are at least as rigorous as the COE- developed standards.

☒ The State will use the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138).
☐ The State will use an alternative set of organizational standards. **[Provide supporting documentation if this option is selected]**

6.2. How will/has the State officially adopt(ed) organizational standards for eligible entities in the State? If "Other" is selected, please provide a timeline and additional information, as necessary. **[Check all that apply]**

☒ Regulation
☒ Policy
☒ Contracts with eligible entities
☐ Other, describe: **[Narrative Response, 2500 characters]**

6.3. How will the State assess eligible entities against organizational standards? If "Other" is selected, please provide additional information, as appropriate. **[Check all that apply]**

☐ Peer-to-peer review (with State validation)
☒ Self-assessment (with State validation)
☒ Regular, on-site CSBG monitoring
☒ Other, describe: **[Narrative Response, 2500 characters]**

The assessment of eligible entities against organizational standards has also been incorporated within the State's triennial assessment of eligible entities.

6.4. Briefly describe State procedures for corrective action based on organizational standards. **[Narrative Response, 2500 characters]**

Based on CSBG Information Memorandum No. 116 and the new CSBG Organizational Standards, New York State procedures for corrective action are outlined in the following steps:

(a) Inform the entity of the deficiency to be corrected;

(b) Require the entity to correct the deficiency;

(c) (i) offer training and technical assistance, if appropriate, to help correct the deficiency, and prepare and submit to the DHHS a report describing the training and technical assistance offered; or (ii) if DOS determines that such training and technical assistance is not appropriate, prepare and submit to the DHHS a report stating the reasons for the determination;

(d) (i) in the discretion of the State, the State may allow the eligible entity to develop and implement, within 60 days of being informed of the deficiency, a Quality Improvement Plan (QIP) to correct the deficiency within a reasonable period of time as determined by the State; and, (ii) not later than 30 days after receiving from an eligible entity a proposed QIP pursuant to subparagraph (i), either to approve such proposed plan or specify the reasons why the proposed plan cannot be approved; and

(e) After providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding under the CSBG Act of the eligible entity unless the entity corrects the deficiency.

A determination by the State to terminate the designation or reduce the funding of an eligible entity is reviewable by HHS, upon request made to HHS, pursuant to the CSBG Act.

6.5. If the State is using the COE-developed organizational standards, will the State slightly modify the standards, as described in IM 138, *State Establishment of Organizational Standards for CSBG Eligible Entities*? ☐ Yes ☒ No

6.5a. If yes was selected in Item 6.5, describe how the State will modify the COE-developed organizational standards, and provide a justification. **[Narrative Response, 2500 characters]**

6.6. Will the State make exceptions in applying the organizational standards for any eligible entities due to special circumstances or organizational characteristics, as described in IM 138, *State Establishment of Organizational Standards for CSBG Eligible Entities*? ☐ Yes ☒ No

6.6a. If yes was selected in Item 6.6, list which eligible entities, the State will exempt from meeting organizational standards, and provide a justification. **[Narrative Response, 2500 characters]**

If this is the first year filling out the automated State Plan, please skip the following question.

6.7. Target: What percentage of assessed eligible entities in the State does the State expect will meet the State-adopted organizational standards in the next year?

Note: This information is associated with State Accountability Measures 6Sa and may pre-populate the State's annual report form.

SECTION 7
State Use of Funds

90 Percent Funds

7.1 **Formula:** Please select the method (formula) that best describes the current practice for allocating CSBG funds to eligible entities. **[Dropdown options]**

- ☐ Historic
- ☒ Base + Formula
- ☐ Formula Alone
- ☐ Formula with Variables
- ☐ Hold Harmless + Formula
- ☒ Other **[Narrative, 2500 Characters]**

At the inception of the CSBG program, the State allocated CSBG funding to eligible entities throughout the State using a Base plus Formula methodology. Due to the proportional share requirements applicable to the distribution of funds to eligible entities, the percentage of funding provided to each eligible entity is mandated to be the same from year to year and has therefore remained a constant percentage for each eligible entity based on its historic funding level. The funding formula has not changed since the inception of the CSBG program in the State.

7.1a. Does the State statutory or regulatory authority specify the terms or formula for allocating the 90 percent funds among eligible entities? ☒ Yes ☐ No

7.2. **Planned allocation:** Specify the planned allocation of 90 percent funds to eligible entities, as described under Section 675C(a) of the CSBG Act. The estimated allocations may be in dollars or percentages. Please complete either column 2, "Funding Amount in $," **OR** column 3, "Funding Amount in %."

Planned CSBG 90 Percent Funds				
CSBG Eligible Entity	**Year One (FFY 2016)**		**Year Two (FFY 2017)**	
	Funding Amount $	**Funding Amount %**	**Funding Amount $**	**Funding Amount %**
Will be auto-populated from Section 5, Table 5.1, Column 1	Enter either the dollar amount or percentage for each eligible entity for the first year that this plan covers		Enter either the dollar amount or percentage for each eligible entity for the second year that this plan covers (If this is one-year plan, these columns can be left blank)	
Total	Totals will be auto-populated		Totals will be auto-populated	

Planned Allocation of CSBG 90 Percent Funds to Eligible Entities		
CSBG Eligible Entity	***FFY 2016 Funding Amount***	***FFY 2017 Funding Amount***
Albany County Opportunity, Inc.	240,600	240,600
Allegany County Community Opportunities and Rural Development, Inc.	216,221	216,221
Opportunities for Broome, Inc.	325,635	325,635
Cattaraugus Community Action, Inc.	220,613	220,613
Cayuga/Seneca Community Action Agency, Inc.	382,778	382,778
Chautauqua Opportunities, Inc.	220,613	220,613
Economic Opportunity Program, Inc. of Chemung County	382,778	382,778
Opportunities for Chenango, Inc.	220,613	220,613
Joint Council for Economic Opportunity of Clinton and Franklin Counties, Inc.	476,213	476,213
Columbia Opportunities, Inc.	220,613	220,613
Cortland County Community Action Program, Inc.	220,613	220,613
Delaware Opportunities, Inc.	220,613	220,613
Dutchess County Community Action Agency, Inc.	420,688	420,688
Community Action Organization of Erie County, Inc.	1,911,403	1,911,403
Adirondack Community Action Programs, Inc.	220,613	220,613
Fulmont Community Action Agency, Inc.	331,724	331,724
Community Action of Greene County, Inc.	220,613	220,613
Community Action Planning Council of Jefferson County, Inc.	220,613	220,613
Lewis County Opportunities, Inc.	220,613	220,613
Livingston County Board of Supervisors (Community Initiatives Council)	216,221	216,221
Community Action Program for Madison County, Inc.	216,221	216,221
Action for a Better Community, Inc.	1,623,355	1,623,355
Economic Opportunity Commission of Nassau County, Inc.	2,146,533	2,146,533
Niagara Community Action Program, Inc.	320,634	320,634
New York City Department of Youth and Community Development	30,785,565	30,785,565
Mohawk Valley Community Action Agency, Inc.	603,391	603,391
People's Equal Action and Community Effort, Inc.	1,431,182	1,431,182
Regional Economic Community Action Program, Inc.	506,245	506,245
Community Action of Orleans and Genesee, Inc.	382,778	382,778
Oswego County Opportunities, Inc.	216,221	216,221
Opportunities for Otsego, Inc.	220,613	220,613
Commission on Economic Opportunity for the Greater Capital Region, Inc.	220,613	220,613
PathStone Corporation	325,685	325,685
Saratoga County Economic Opportunity Council, Inc.	220,613	220,613
Schenectady Community Action Program, Inc.	220,613	220,613
Schoharie County Community Action Program, Inc.	220,613	220,613
Pro Action of Steuben and Yates, Inc.	382,778	382,778
St. Lawrence County Community Development Program, Inc.	220,613	220,613
Economic Opportunity Council of Suffolk, Inc.	1,201,068	1,201,068
Community Action Commission to Help the Economy, Inc.	220,613	220,613
Tioga Opportunities, Inc.	220,613	220,613
Tompkins Community Action, Inc.	220,613	220,613
Ulster County Community Action Committee, Inc.	220,613	220,613
Warren-Hamilton Counties Action Committee for Economic Opportunity, Inc.	331,724	331,724
Washington County Economic Opportunity Council, Inc.	220,613	220,613

Wayne County Action Program, Inc.	220,613	220,613
Westchester Community Opportunity Program, Inc.	1,508,808	1,508,808
Wyoming County Community Action, Inc.	216,221	216,221
Yonkers Community Action Program, Inc.	435,693	435,693
Total	52,391,849	52,391,849

7.3. **Contracts:** Describe the contracting mechanism and timeframe the State uses to distribute funds to the eligible entities. **[Narrative, 2500 Characters]**

The State uses a multiyear contract as a mechanism to provide funding to each CSBG eligible entity. In April of each multiyear contract cycle, work plans and budget forms are distributed for grantees to begin development of the contract package. In June, the remaining documents comprising the contract package are sent to the grantees to complete. The full package of documents is due three weeks later. When contracts are received by DOS, they are distributed among the program analysts and fiscal representatives for review. Once the contract has been reviewed, it is sent to the NYS Attorney General's Office and the NYS Comptroller's office for review and approval. DOS anticipates that all appropriately completed contracts will be approved by October 1 and funds distributed upon receipt of the Federal Notice of Grant Award.

State Legislative or Administrative Approval

7.4. Must the State get State legislative approval (annually or more frequently) or other types of administrative approval before distributing 90 percent funds to eligible entities? If yes, please describe.

☒ Yes ☐ No

7.4a. If yes was selected in previous question, how many business days does this process generally take? **[Insert a number between 0 – 99]**

35

7.4b. Please describe the approval process. **[Narrative, 2500 Characters]**

State Legislative approval for the distribution of CSBG funding to be received by the State during the upcoming Federal Fiscal Year is generally granted by the passage of the State Budget in April. CSBG funding to eligible entities is distributed pursuant to contracts entered into between the Department of State and each individual eligible entity. The contracting process requires approval from the Department of State, New York State Office of the Attorney General, and the New York State Office of the State Comptroller. The Department of State Division of Community Services provides contract documents, including budgets and work plans, to all eligible entities for negotiation and completion. Once a completed contract is received by the Department of State, the contract package is reviewed for approval and processing by the Department's Bureau of Fiscal Management (approximately 5 business days). Once approved by the Department of State, the contract package is provided to the New York State Office of the Attorney General for approval (up to 15 business days), and the New York State Office of the State Comptroller for final approval (up to 15 business days).

7.5. **Distribution Timeframe after State authority:** After getting State authority, the State expects to make funds available to eligible entities within how many calendar days? **[Dropdown Box Selection]**

☐ 1 to 14 calendar days
☒ 15 to 30 calendar days
☐ Over 30 calendar days, specify number of days **[Numeric, enter number between 31 –100]**
☐ Varies

Note: This information is associated with State Accountability Measure 2Sa; the response may pre-populate the State's annual report form.

7.5a. Please explain the process for making funds available after getting State authority. Take into the account the time frame that the State specified under Item 7.5. Also include information about agency approval, contractual procedures, etc., as appropriate. **[Narrative, 2500 characters]**

Funding availability is based on the level of funding provided in the Federal Notice of Grant Award (NGA) to the State. Initial payments of CSBG funds are generally made available to eligible entities within one month of the October 1 contract start date. Upon receipt of the NGA and completion of the contracting and approval process described in the State's response to Section 7.4b above, CSBG funding is made available to eligible entities using an advance payment methodology, which provides four payments per year to each eligible entity in 25 percent increments. The first 25 percent payment is made upon final contract approval and the State's receipt of Federal CSBG funding. Subsequent payments of 25 percent are processed throughout the contract year when the eligible entity has submitted financial reports documenting expenditures at specific minimum levels (20%, 45%, and 70%), along with program progress reports and narratives showing measurable progress toward achieving contractually established service provision goals and other compliance requirements.

If this is the first year filling out the automated State Plan, please skip the following question.

7.6. **Performance Management Adjustment**: How is the State improving grant administration procedures under this State Plan as compared to past plans? Any improvements should be based on analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources. If the State is not making any improvements, please explain. **[Narrative, 2500 Characters]**

Note: This information is associated with State Accountability Measure 2Sb; the response may pre-populate the State's annual report form.

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

7.7. What amount of State CSBG funds does the State plan to allocate for administrative activities, under this State plan? The estimate may be in dollars or a percentage. **[Numeric response, specify $ or %]**

5%

7.8. How many State staff positions will be funded in whole or in part with CSBG funds under this State Plan? **[Insert a number between 0 – 99]**

45

7.9. How many State Full Time Equivalents (FTEs) will be funded with CSBG funds under this State Plan? **[Insert a number between 0 – 99]**

25

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

7.10. Describe how the State plans to use remainder/discretionary funds, as described in Section 675C(b) of the Act, as required by the assurance in 676(b)(2) of the CSBG Act.

Instructional Note: The information entered in the table below will pre-populate the corresponding assurance [676(b)(2)] under Item 14.2 in the "CSBG Programmatic Assurances and Information Narrative." Please note: the assurance under 676(b)(2) of the Act specifically requires a description of how the State intends to use remainder/discretionary funds to "support innovative community and neighborhood-based initiatives related to the purposes of [the CSBG Act]." Please include this description in row "f" of the table below and/or attach the information.

Note: This information is associated with State Accountability Measures 3Sa; the responses may pre-populate the State's annual report form.

Use of Remainder/Discretionary Funds					
Remainder/ Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	**Year One**		**Year Two**		**Brief description of services/activities**
	Planned $	**Planned %**	**Planned $**	**Planned %**	
a. Training/technical assistance to eligible entities	$369,631	12.7% of remainder funds (0.7% of total CSBG funding received by the State)	$369,631	12.7% of remainder funds (0.7% of total CSBG funding received by the State)	**[Not Fillable]** These planned services/activities will be described in State Plan Item 8.1
b. Coordination of State-operated programs and/or local programs	$75,000	2.6% of remainder funds (0.2% of total CSBG funding received by the State)	$75,000	2.6% of remainder funds (0.2% of total CSBG funding received by the State)	**[Not Fillable]** These planned services/activities will be described in State Plan Item 9.1 and 9.2
c. Statewide coordination and communication among eligible entities	$37,500	1.3% of remainder funds (0.1% of total CSBG funding received by the State)	$37,500	1.3% of remainder funds (0.1% of total CSBG funding received by the State)	**[Not Fillable]** These planned services/activities will be described in in State Plan Items 9.3 – 9.5
d. Analysis of distribution of CSBG funds to determine if targeting greatest need					**[Narrative, 2500 characters]** Provided through administrative funds, not discretionary funds.

e. Asset-building programs					**[Narrative, 2500 characters]**
f. Innovative programs/activities by CAAs or other neighborhood groups (may include fatherhood and strengthening families initiatives)	$2,037,461	70% of remainder funds (3.3% of total CSBG funding received by the State)	$2,037,461	70% of remainder funds (3.3% of total CSBG funding received by the State)	**[REQUIRED Narrative, 2500 characters]** Innovative programs include services to new Americans and competitive workforce development grant initiatives serving low-income persons throughout the State. In addition, any unused administrative funds may also be used to support innovative programs/activities and/or training and technical assistance activities.
g. State charity tax credits					**[Narrative, 2500 characters]**
h. Other activities, specify i. Tribal anti-poverty services ii. Disaster relief services	i. $291,069 ii. $100,000	i. 10% of remainder funds (0.5% of total CSBG funding received by the State) ii. 3.4% of remainder funds (0.2% of total CSBG funding received by the State)	i. $291,069 ii. $100,000	i. 10% of remainder funds (0.5% of total CSBG funding received by the State) ii. 3.4% of remainder funds (0.2% of total CSBG funding received by the State)	**[Narrative, 2500 characters]** i. State law requires 0.5% of remainder funding to be distributed to tribes or tribal organizations for the provision of anti-poverty services. ii. A portion of remainder funding is made available for disaster relief activities conducted through the eligible entity network in the State, as needed. If not needed, unused disaster relief funds may be used for supplemental training and technical assistance activities or innovative programs/activities.
Totals	$2,910,661	100% of remainder funds (5% of	$2,910,661	100% of remainder funds (5% of	

		total CSBG) funding received by the State)		total CSBG) funding received by the State)	

7.11. Indicate the types of organizations to which the State plans to allocate CSBG remainder/discretionary funds (by grant or contract) to carry out the activities in Table 7.10. **[Check all that apply and narrative where applicable]**

☒ CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds) ____5____
☒ State association
☒ Regional CSBG technical assistance provider(s)
☐ National technical assistance provider(s)
☐ Individual consultant(s)
☒ Other – Community Based Organizations/Neighborhood Organizations and Tribal Organizations

If this is the first year filling out the automated State Plan, please skip the following question.

7.12. **Performance Management Adjustment**: How is the State adjusting the use of remainder/discretionary funds under this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources. If the State is not making any adjustments, please explain. **[Narrative, 2500 Characters]**

Note: This information is associated with State Accountability Measures 3Sb, and will pre-populate the State's annual report form.

SECTION 8
State Training and Technical Assistance Plan

8.1. Describe the State's plan for delivering CSBG funded training and technical assistance to eligible entities under this State plan. (CSBG funding used for this activity is referenced under Item 7.10(a), Use of Remainder/Discretionary Funds).

Note: This information is associated with State Accountability Measures 3Sc; this response may pre-populate the State's annual report form.

Training and Technical Assistance		
FY Quarter	**Training, Technical Assistance, or Both**	**Category**
Dropdown Options: • Quarter (Q) 1 • Q2 • Q3 • Q4 • Q5 • Q6 • Q7 • Q8 X Ongoing/Multiple Quarters • All quarters	**Toggle Options:** • Training • Technical Assistance X Both	**Dropdown Options:** X Fiscal X Governance/Tripartite Boards X Organizational Standards – General X Organizational Standards – technical assistance for eligible entities with unmet standards X Reporting X ROMA X Community Assessment X Strategic Planning X Monitoring X Communication X Technology • Other _____
ADD a ROW function Note: you will be able to add a row for each additional training		

8.2. Does the State have in place Technical Assistance Plans (TAPs) for all assessed eligible entities with unmet organizational standards that could be resolved within one year? ☐ Yes ☒ No

Note: This item is associated with State Accountability Measure 6Sb.

If this is the first year filling out the automated State Plan, please skip the following question.

8.3. **Performance Management Adjustment**: How is the State adjusting the training and technical assistance plan under this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources. If the State is not making any adjustments, please explain. **[Narrative, 2500 Characters]**

Note: This information is associated with State Accountability Measures 3Sd; this response may pre-populate the State's annual report form.

SECTION 9
State Linkages and Communication

9.1. **State-level Linkages and Coordination**: Indicate the linkages and coordination at the State level that the State plans to create or maintain to ensure increased access to CSBG services to low- income people and communities under this State plan and avoid duplication of services, as described under 675C(b)(1)(B) and as required by the assurance under Section 676(b)(5) of the CSBG Act. Please attach additional information as needed. (CSBG funding used for this activity is referenced under Item 7.10(b), Use of Remainder/Discretionary Funds). **[Check all that apply]**

Note: This response will pre-populate the corresponding CSBG assurance, item 14.5. In addition, this item is associated with State Accountability Measure 7Sa; this response may pre-populate the State's annual report form.

- ☒ 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 – Office for New Americans

9.2. **Local-level Linkages and Coordination**: Describe the linkages and coordination at the local level that the State and eligible entities plan to create or maintain to ensure increased access to CSBG services to low-income people and communities and avoid duplication of services, as described under 675C(b)(1)(B) and as required by the assurance under Section 676(b)(5) of the CSBG Act. Please attach additional information as needed. (CSBG funding used for this activity is referenced under Item 7.10(b), Use of Remainder/Discretionary Funds.)

DOS requires eligible entities to identify their many State and local partners and the scope of their affiliations in the annual refunding package (funded by the 90% to eligible entities). The partnerships and their associated outcomes are included in the work plan with the corresponding program they enhance, augment, or expand. Partnerships are formed with other service providers, local governments, educational institutions, religious entities, and businesses to name a few. DOS uses State administrative funds for activities intended to achieve this purpose.

Note: This response will pre-populate the corresponding CSBG assurance, item 14.5.

9.3. **Coordination among Eligible Entities**: Describe State activities for supporting coordination among the eligible entities. (CSBG funding used for this activity is referenced under Item 7.10(c), Use of Remainder/Discretionary Funds.) **[Narrative Response, 2500 Characters]**

The New York State Community Action Association (NYSCAA) carries out this function by conducting regional and statewide meetings, producing monthly newsletters, and creating working groups or task forces on pertinent topics such as data collection or best practices.

9.4 **Communication with Eligible Entities**: In the table below, describe the State's plan for communicating with eligible entities and partners under this State plan. Include communication about annual hearings and legislative hearings, as described under Section 6, CSBG Hearing Requirements. (CSBG funding used for this activity is referenced under Item 7.10(c), Use of Remainder/Discretionary Funds.)

NYSCAA carries out this function with the use of remainder funds by providing information on matters of concern regarding the CSBG program to eligible entities throughout the State. In addition, State administrative funds are used for this purpose by DOS.

Communication Plan

Topic	**Expected Frequency**	**Format (drop down)**
[Narrative Response]	**Dropdown Options:** • Daily • Weekly • Twice-Monthly • Monthly • Semi-Annually • Annually	**Dropdown Options:** • Newsletter • Mailing • Meetings/Presentation • Blog • Email • Website • Social Media • Other_____
ADD a ROW function *Note: you will be able to add as many rows as needed*		

Topic	**Expected Frequency**	**Format (drop down)**
General Information on Program and Locations	Daily	Website
Reports/Plans/Guides	Daily	Website
Frequently Asked Questions	Daily	Website
Program Updates	Monthly	Newsletter and Email
Site Visits to Eligible Entities	Quarterly	Email, Reports, Mailing
Contract Reviews	Semi-Annually	Email, Site Visit, Reports, Mailing
State Plan and Hearings	Annual	Email, Website, Meetings, State Register

9.5. Describe how the State will provide feedback within 60 calendar days to local entities and State Community Action associations regarding performance on State Accountability Measures. **[Narrative Response, 2500 Characters]**

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

Upon identifying a discrepancy between planned and actual performance by a CAA, the DOS program and/or fiscal analyst will contact the grantee within 14 business days to provide written comment and assistance regarding any noted shortfalls in program performance.

If this is the first year filling out the automated State Plan, please skip the following question.

9.6. **Performance Management Adjustment**: How is the State adjusting the Communication Plan in this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources. If the State is not making any adjustments, please explain. **[Narrative Response, 2500 Characters]**

Note: This information is associated with State Accountability Measures 7Sb; this response may pre-populate the State's annual report form.

SECTION 10
Fiscal Controls and Monitoring

Monitoring of Eligible Entities (Section 678B(a) of the Act)

10.1. Specify the proposed schedule for planned monitoring visits, 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.

This is an estimated schedule to assist States in planning. States may indicate "no review" for entities the State does not plan to monitor in the performance period.

For States that have a monitoring approach that does not fit within the table parameters, please attach the State's proposed monitoring schedule.

See Attachment 4: Response to Section 10.1 – Proposed Quarterly Monitoring Schedule and Date of Last Comprehensive Organization Review and Evaluation (CORE) Completed

Note: This information is associated with State Accountability Measure 4Sa(i); this response may pre-populate the State's annual report form.

CSBG Eligible Entity	Review Type	Target Date	Date of Last Full Onsite Review (if applicable)
Will auto-populate from Item 5.1	**Dropdown Options:** Triennial Newly Designated Follow-up Other **[Narrative Required]** No review	**Dropdown Options:** FY1 Q1 FY1 Q2 FY1 Q3 FY1 Q4 FY2 Q1 FY2 Q2 FY2 Q3 FY2 Q4	**Select a date**

10.2. Provide a copy of State monitoring policies and procedures by attaching and/or providing a hyperlink. **[Attach a document or add a link]**

See Attachment 5: Response to Section 10.2 – Program and Fiscal Monitoring Process Guideline REV 2015

10.3. According to the State's procedures, by how many calendar days must the State disseminate initial monitoring reports to local entities? **[Insert a number from 1 – 100]**

30 days for quarterly monitoring visit reports and 60 days for the triennial assessment draft report.

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 Act)

10.4. Are State procedures for addressing eligible entity deficiencies and documenting closure of findings included in the State monitoring protocols attached above? ☒ Yes ☐ No

10.4a. If you selected "no," please describe State procedures for addressing eligible entity deficiencies and documenting closure of findings. **[Narrative Response, 2500 characters]**

NOTE: Table 10.5 (below) WILL ONLY BE AVAILABLE TO STATES AND OCS WITHIN THE OLDC SYSTEM. States will be able to print out a version of their Model State Plan without this table to share with the public. OCS must receive this data in order to fulfill Federal monitoring and oversight responsibilities. However, we recognize this information may be sensitive, so it will not be publically available through OLDC.

10.5. **Serious Deficiencies:** In the table below, include each eligible entity that has one or more unresolved serious deficiencies as of the date of the submission of this State Plan. Include all the information requested in the table.

Eligible Entity	Serious Deficiency or deficiencies	Is the entity on a Quality Improvement Plan?	Are any of the deficiencies related to organizational standards?	Expected resolution data
Drop down choices from 4.1	**Please describe – text**			**Date picker**
ADD a ROW function *Note: you will be able to add as many rows as needed*				

Total number with unresolved serious Deficiencies: [automatic calculation from table]

Subtotal number on QIPs: [automatic calculation from table]

Subtotal number on QIPs related to organizational standards: [automatic calculation from table]

Note: This item is associated with State Accountability Measure 4Sa(iii). The QIP information is associated with State Accountability Measures 4Sc. In addition, information about organizational standards corresponds with Section 6 and is associated with State Accountability Measure 6Sb(ii).

10.6. Has the State reported all of the eligible entities with unresolved serious deficiencies to the Office of Community Services? ☒ Yes ☐ No

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

10.7. Does the State assure, according to Section 676(b)(8), that "any eligible entity that received CSBG funding the previous fiscal year 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, subject to review by the Secretary as provided in section 678C(b)." (This response will pre-populate the corresponding assurance under Section 14.8.) ☒ Yes ☐ No

10.8. Does the State CSBG statute or regulations provide for the designation of new eligible entities?
☒ Yes ☐ No

10.9. Does the State CSBG statute or regulations provide for de-designation of eligible entities?
☒ Yes ☐ No

10.10. Does the State statute or regulations specify a process the State CSBG agency must follow to re-designate an existing eligible entity? ☐ Yes ☒ No

Fiscal Controls and Audits and Cooperation Assurance:

10.11 Describe how the State's fiscal controls and accounting procedures will a) permit preparation of the SF-425 Federal fiscal reports (FFR) and b) permit the tracing of expenditures adequate to ensure funds have been used appropriately under the block grant, as required by Title 2 of the Code of Federal Regulations, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200.302(a)). **[Narrative Response, 2500 Characters or attach a document]**

The New York State (NYS) Guide to Financial Operations acts as a reference source for statewide accounting policies, procedures and rules of the Office of the State Comptroller (OSC). The New York State Statewide Financial System (SFS) segregates the Community Services Block Grant expenditure accounts and cash fund from all other NYS accounts and funds. This enables the SF-425 Form preparer to isolate CSBG expenditures and respective drawdowns not only by the grant but also by award year. The financial system incorporates expenditure procedures that require DOS supervisory approval as well as OSC approval. All expenditures are supported by an invoice or internal document and a procurement record when necessary. Expenditures at the sub-grantee level are monitored closely by DOS fiscal representatives and program analysts by desk and on-site reviews. This includes review of reported expenditures traced from the submitted financial report to the sub-grantee accounting records and supporting documents. These reviews are conducted under the guidance of and in accordance with applicable Federal policies, OMB Circulars, and State procedures.

10.12. Describe State procedures for issuing management decisions for eligible entity single audits, as required by Title 2 of the Code of Federal Regulations, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200.521). If these procedures are described in the State monitoring protocols attached under item 10.2, please indicate the page number. **[Narrative Response, 2500 Characters or attach a document]**

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

Audit reports are reviewed for compliance with current OMB Circular/CFR guidance by DOS fiscal staff. Additional information regarding findings or expenditure reconciliation is obtained if necessary to complete the review. The review package is forwarded to a supervisor for final review. A management decision letter is then generated stating acceptance of the audit report with any finding requiring a corrective action or follow up review described as necessary. Management decisions are issued within six months of acceptance of the audit report.

10.13. Will the State "permit and cooperate with Federal investigations undertaken in accordance with Section 678D" of the CSBG Act, as required by the assurance under 676(b)(7) of the CSBG Act. (This response will pre-populate Item 14.7) ☒ Yes ☐ No

If this is the first year filling out the automated State Plan, please skip the following question.

10.14. **Performance Management Adjustment**: How is the State adjusting monitoring procedures in this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources. If this State is not making any adjustments, please explain. **[Narrative Response, 2500 Characters]**

Note: This item is associated with State Accountability Measure 4Sb; this response may pre- populate the State's annual report form.

SECTION 11
Eligible Entity Tripartite Board

11.1. Which of the following measures are taken to ensure that the State verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B of the CSBG Act? **[Check all that apply and narrative if applicable]**

- ☒ Attend Board meetings
- ☒ Review copies of Board meeting minutes
- ☒ Keep a register of Board vacancies/composition
- ☐ Other

11.2. How often does the State require eligible entities to provide updates (e.g., copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc.) regarding their Tripartite Boards? This does not apply to those entities under a Corrective Action Plan or Quality Improvement Plan. **[Check all that apply]**

- ☒ Annually
- ☐ Biannually
- ☒ Quarterly
- ☐ Monthly

11.3. Describe how the State will carry out the assurance under Section 676(b)(10) of the Act that the State will require eligible entities to have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entities' tripartite board. (This response will pre-populate the corresponding Item 14.10.) **[Narrative, 2500 Characters]**

DOS program analysts conduct an annual review of eligible entity by-laws to ensure this provision is included. In addition, program analysts conduct annual Board reviews to verify compliance. Program analysts also receive Board packets from their assigned entities which would identify any petitions for representation and the discussion thereof.

Section 12
Individual and Community Eligibility Requirements

12.1. Required individual income eligibility:

12.1a. Is individual income eligibility for services set at 125% of the HHS poverty line? If no, what is the income eligibility threshold in the State? If it varies, please describe.

☒ Yes ☐ No
[If "no" or "varies" is selected, Narrative, 2500 Characters]

12.1b. Does the State have a policy for participant eligibility? If yes, please attach or describe the policy. If no, please explain.

☒ Yes ☐ No
[Narrative, 2500 Characters, or attachment]

Pursuant to the Federal CSBG Act, the State requires that eligible entities incorporate the 125% of the Federal poverty line standard as a criterion of eligibility in their administration of the CSBG program. Through quarterly on-site monitoring and the provision of training and technical assistance, DOS works with eligible entities to ensure that the Federal requirement regarding use of the poverty line as a criterion of eligibility is incorporated into intake procedures and program planning. DOS has provided additional guidance to eligible entities in the State through the creation and distribution of a written Informational Memorandum entitled "Determining Income Eligibility for CSBG Funded Activities and Programs" (August 11, 2011), and has also incorporated CAPLAW's guidance document entitled "CSBG Q&A on … Client Eligibility" (available online at: http://www.caplaw.org/resources/PublicationDocuments/CAPLAW_ClientEligibility_Sept2013.pdf) into training and technical assistance provided to eligible entities in regard to this topic.

Generally, to be eligible for CSBG services in New York State, clients must be at or below 125% of the Federal poverty line as determined by the Federal Office of Management and Budget (OMB) based on the most recent Census data and as revised annually (or more frequently) by the U.S. Department of Health and Human Services (the HHS poverty guidelines). In addition, the New York City Division of Youth and Community Development (DYCD), the public eligible entity designated to serve the New York City service area, uses a community/neighborhood based approach to client income eligibility, with the Federal poverty line serving as a criterion of eligibility as required pursuant to the CSBG Act. DYCD has devised this system and methodology for income eligibility around the qualification and designation of "Neighborhood Development Areas" (NDAs). DYCD distributes CSBG funds to neighborhood-based organizations within designated NDAs for the provision of anti-poverty services to individuals and families within those NDAs. DYCD qualifies an area as an NDA if either: (1) at least 30 percent of the area's residents live in households with incomes at or below 125% of the poverty line; or (2) at least 30,000 residents in the area are at or below 125% of the poverty line. Through this methodology for CSBG-funded service delivery, DYCD uses the "poverty line … as a criterion of eligibility in the community services block grant program," as required by 42 USC § 9902[2].

12.2. **Income eligibility for general/short term Services**: For services with limited in-take procedures (where individual income verification is not possible or practical), how do eligible entities generally verify income eligibility for services? An example of these services is emergency food assistance. **[Narrative, 2500 Characters]**

There are a few instances worth noting where income verification is not possible, practical, or considered a detriment to service provision, and as such, not required. One such example is service provided on a group, rather than individual basis where circumstances indicate that those benefiting are likely to meet the CSBG income eligibility requirements. For example, a "job skills" class at a homeless shelter, a parents group for Head Start families, and a diabetes prevention workshop located in a high concentration poverty zone. Another circumstance would be a soup kitchen or food pantry in an economically depressed area. Services are provided on an individual basis but circumstances render income eligibility verification impossible or impracticable. And finally, another example would be services obtained during a storm disaster or other like event. In that situation, income verification is an impediment to provision of relief efforts and can impede a rapid response.

12.3. **Community-targeted Services**: For services that provide a community-wide benefit (e.g., development of community assets/facilities; building partnerships with other organizations), how do eligible entities ensure the services target low-income communities? **[Narrative, 2500 Characters]**

For community-targeted services that are intended to increase community awareness of poverty, or involvement in poverty issues and anti-poverty community partnerships, eligible entities are not expected to verify income eligibility, as doing so would limit participation and dissuade broad participation. Examples of such activities include an eligible entity community forum on parole re-entry in a high poverty zip code; convening a meeting of human service organizations to discuss expansion and access to anti-poverty services; and, holding an open house for community members to discuss program services.

SECTION 13
Results Oriented Management and Accountability System (ROMA)

13.1. ROMA participation

In which performance measurement system will the State and all eligible entities participate, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act? (This item corresponds with Section 14.12, CSBG Programmatic Assurances and Information Narrative, of this plan.) **[Select one]**

☒ The Results Oriented Management and Accountability (ROMA) System
☐ Another performance management system developed pursuant to section 678E(b) of the CSBG Act
☐ An alternative system for measuring performance and results

13.1a. If you selected ROMA above, please attach and/or describe the State's written policies, procedures, or guidance documents on ROMA. **[Attachment and Narrative Response, 2500 characters]**

See Attachment 6: Response to Section 13.1 – Excerpt from Attachment D, page 6 of 7, of the State CSBG Contract with Eligible Entities (requiring the use of ROMA by all grantees). In addition to contractually requiring the use of ROMA by all eligible entities within the State (see Attachment 6), DOS funds ROMA training by NYSCAA for CSBG grantees and uses the DOS website to describe ROMA and link users to the guidance documents made available online by the National Association for State Community Services Programs (see http://www.nascsp.org/CSBG/594/ROMA.aspx?iHt=13).

13.1b. If you did not select ROMA above, please describe the system the State will use for performance measurement. **[Narrative Response, 2500 characters]**

13.2. Indicate and describe the outcome measures the State will use to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization (as required under Section 676(b)(12) of the CSBG Act)? **[Select one and provide narrative]**

(This item also corresponds with Section 14.12, CSBG Programmatic Assurances and Information Narrative, of this plan.)

☒ CSBG National Performance Indicators (NPIs)
☐ NPIs and others
☐ Others

CSBG work plans include NPIs associated with program and agency outcomes as a way to measure eligible entity performance. Progress on the outcomes contained in the CSBG work plans is tracked and reported by the grantee each quarter and reviewed by DOS program analysts.

13.3. How does the State support the eligible entities in using the ROMA system (or alternative performance measurement system)? **[Provide a narrative or attach a document]**

Note: These State activities may overlap with activities listed in "Section 8: Training and Technical Assistance." If so, please mention briefly, and/or cross-reference as needed.

Several program analysts, as well as members of NYSCAA are certified ROMA trainers. DOS and NYSCAA provide training and technical assistance to eligible entities. DOS reviews eligible entity compliance with the ROMA system.

13.4. How is the State validating that the eligible entities are using data to improve service delivery? **[Provide a narrative or attach a document]**

As part of the State's triennial assessment process, program analysts verify that qualitative and quantitative data is collected and measured against performance to improve service delivery. In addition, the DOS annual compliance review of the national organizational standards required by HHS includes a review of progress or improvement in service delivery at eligible entities based on data collected and reported to eligible entities' management staff, governing boards, and the State.

SECTION 14
CSBG Programmatic Assurances and Information Narrative
(Section 676(b) of the CSBG Act)

14.1 Eligible entity program activities

Activities Targeting Seven Programmatic Purposes

14.1a. Describe how CSBG funds will be used to support activities to assist low-income families and individuals, including families receiving Temporary Assistance to Needy Families (TANF), the homeless, migrant or seasonal farmworkers, and elderly low-income individuals and their families, to help them achieve the seven programmatic purposes under 676(b)(1)(A). Please include information about **each** programmatic purpose. **[Attach a document]**

See Attachment 7: Response to Section 14.1a – Activities Targeting Seven Programmatic Purposes

Needs of Youth

14.1b. Describe how the activities of the local CSBG eligible entities will address the needs of youth in low-income communities as described under 676(b)(1)(B). **[Narrative, 2500 characters OR attach a document]**

The DOS and the CSBG network are committed to addressing the needs of youth in low-income communities. To that end, the Division of Community Services contracts with a number of eligible entities each year to provide services to youth in low-income communities. Such services include summer jobs programs, youth recreation activities, school dropout prevention and homework assistance. In addition, eligible entities also provide such services as education counseling, Head Start, day care, and ESOL/ESL instruction. Eligible entities are monitored by DOS for achievements in the area of Youth services quarterly.

Coordination of Other Programs

14.1c. Describe how the activities of the local CSBG eligible entities will make more effective use of, and coordinate with, other programs related to the purposes of CSBG, as described under 676(b)(1)(C). **[Narrative, 2500 characters OR attach a document]**

New York State eligible entities work with a number of local and statewide organizations in pursuit of expanding and enhancing services to the low-income population. This could include organizations such as the Food Bank, faith-based entities, and local governments, to name a few. The New York State CSBG work plan includes a section on Partnerships. Grantees must identify the name of the organization, describe their involvement, and list the intended outcome for each partnership. DOS verifies that these partnerships are carried out through the routine monitoring of grantees and through the negotiation of contract work plans.

State Use of Discretionary Funds

14.2 Describe how the State will use remainder/discretionary funds as described under 676(b)(2) of the CSBG Act. **[Pre-populate** "State Use of Funds: Remainder/Discretionary," items 7.10 and 7.11.**]**

Please refer to the State's responses to Sections 7.10 and 7.11 of this Plan, provided at pages 19-21 above.

Eligible Entity Service Delivery, Coordination, and Innovation

14.3. Based on the information provided by eligible entities, describe how the State will carry out the assurance under Section 676(b)(3) of the CSBG Act.

Eligible Entity Service Delivery System

14.3a. Describe the service delivery system of the local CSBG eligible entities, for services provided or coordinated with CSBG funds, targeted to low-income families in the State. **[Narrative, 2500 characters OR attach a document]**

All areas of the State are presently served by the CSBG network. The 49 eligible entities within the State of New York serve all 62 counties. The specific geographic areas served by each eligible entity are defined by each agency's Certificate of Incorporation and the terms of its CSBG designation.

Eligible Entity Linkages

14.3b. Describe how the eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow- up consultations. **[Narrative, 2500 characters OR attach a document]**

Linkages are developed by eligible entities with local entities and institutions to enhance or expand services. DOS requires grantees to identify their many partners and the scope of their affiliations in the annual refunding package. The partnerships and their associated outcomes are included in the work plan with the corresponding program. The services rendered by the partner are required to be documented in customer files. Referrals require follow-up to document the actual outcome achieved. Partnerships are formed with other service providers, local governments, educational institutions, religious entities, and business to name a few. Grantees are encouraged to establish formal MOUs with their partners and periodically meet to discuss the status of the partnership or renew/update the MOU.

Eligible Entity Funds Coordination

14.3c. Describe how the eligible entities will coordinate CSBG funds with other public and private resources. **[Narrative, 2500 characters OR attach a document]**

At the local level, eligible entities work in partnership with a variety of groups, organizations, and institutions. These entities are represented on their boards of directors and often include members and officials of law enforcement, religious organizations, business and industry, neighborhood groups, and other service providers. The CSBG refunding contract, annual work plans, and reporting documents outline the scope of these partnerships.

Eligible Entity Innovative Community and Neighborhood Initiatives, Including Fatherhood/Parental Responsibility

14.3d. Describe how the local entities will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle which may include fatherhood and other initiatives with the goal of strengthening families and encouraging parental responsibility. Please note: these activities relate to "Innovative programs and activities by CAAs or other neighborhood groups" [Section 675C(b)(1)(F)]; the State indicates any CSBG discretionary funds allocated for these activities under Item 7.10 of this State Plan. **[Narrative, 2500 characters OR attach a document]**

Since FFY 2008, DOS has set aside a portion of its CSBG allocation for targeted grants for innovative community and neighborhood based projects. In recent years, these projects focused on innovative community and neighborhood-based initiatives in such activities as workforce development and the service needs of low-income new Americans. These awards are made on a competitive basis. A Request for Application (RFA) is released and agencies are selected from among the highest scoring applicants. The application process is open to eligible entities and not-for-profit community based/neighborhood based organizations.

Eligible Entity Coordination/linkages: Emergency Food and Nutrition

14.4. Describe how the local eligible entities in the State will provide emergency supplies and services to counteract conditions of starvation and malnutrition, according to the State's assurance under Section 676(b)(4) of the CSBG Act. **[Narrative, 2500 characters OR attach a document]**

CSBG eligible entities operate food pantries and soup kitchens across the State and have increased availability and hours of operation to meet expanding needs. Nearly all eligible entities operate nutrition or nutrition-related programs using CSBG funding along with, or in concert with, other public and private resources.

State and Eligible Entity Coordination/linkages: Employment and Training

14.5. According to the State's assurance under Section 676(b)(5) of the CSBG Act, describe how the State and local eligible entities will coordinate with, and establish linkages between, governmental and other social services programs to assure the effective delivery of employment and training services and avoid duplication; and describe coordination of employment and training activities, as defined in section 3 of the Workforce Innovation and Opportunity Act (WIOA), in the State and in entities providing activities through WIOA systems. **[This response will link with items 9.1 and 9.2.]**

The DOS has a history of working with a variety of State, county, and local agencies to promote the work of the Community Action Network across the State. DOS will continue to work with these agencies, including New York State Department of Labor and local workforce investment boards, the New York State Community Action Association, Inc., the New York State Regional Economic Development Councils, New York State Weatherization Program, New York State Office of Temporary and Disability Assistance, New York State Department of Health, NYS Office for New Americans, and other entities important to ensuring strong coordination of services and avoiding duplication of effort.

Note: The following questions (14.5a and b) about the WIOA Combined State Plan may change depending on the outcome of work with the U.S. Department of Labor and Education to develop this plan.

14.5a. WIOA Combined State Plan: Does the State intend to meet this assurance by describing CSBG employment and training activities as part of a WIOA Combined State Plan, as allowed under the Workforce Innovation and Opportunity Act? ☐ Yes ☒ No

14.5b. If the State selected "no" under 14.5a, please describe how the State will meet this assurance. **[Narrative, 2500 characters OR attach a document]**

The State is developing a WOIA Unified State Plan. The Division of Community Services is working with the State Department of Labor (the lead agency in the development of the Unified Plan) as well as the other involved State agencies to assure maximum coordination of employment and training activities within the State and to foster collaboration and lasting linkages among State agencies and providers of such services, including the CSBG network.

State Coordination/linkages: Low-income Home Energy Assistance

14.6. According to the State's assurance under Section 676(b)(6) of the CSBG Act, describe how the State will ensure coordination between antipoverty programs in each community, and ensure, where appropriate, communities conduct emergency energy crisis intervention programs (relating to low-income home energy assistance). **[Narrative, 2500 characters OR attach a document]**

DOS will work with CSBG grantees which administer the low-income energy assistance program to ensure coordination of services. DOS is a member of the Weatherization Policy Advisory Council and is directly involved in addressing energy assistance to low income persons.

State Fiscal Controls and Monitoring: Federal investigations

14.7. Will the State carry out the assurance under Section 676(b)(7) of the CSBG Act, as indicated in Item 10.12 of this plan? **[Yes/No: Pre-populated with response from 10.12]**

Yes.

State Fiscal Controls and Monitoring: Procedures in the event of reducing or terminating funding to an eligible entity

14.8. Will the State carry out the assurance under Section 676(b)(8) of the CSBG Act, as indicated in Item 10.7 of this plan. **[Yes/No: Pre-populated with response from 10.7]**

Yes.

Eligible Entity Coordination/Linkages: Faith-based organizations, charitable groups, community organizations

14.9. According to the State's assurance under Section 676(b)(9) of the CSBG Act, describe how local eligible entities in the State will coordinate and form partnerships with other organizations, including faith-

based organizations, charitable groups, and community organizations. **[Narrative, 2500 characters OR attach a document]**

At the local level, eligible entities work in partnership with a variety of groups, organizations, and institutions. These groups are represented on the eligible entities' boards of directors and often include members and officials of law enforcement, religious organizations, business and industry, neighborhood groups, and other service providers. The CSBG refunding contract, annual work plans, and reporting documents outline the scope of these partnerships.

Eligible Entity Tripartite Board Representation

14.10. Description of how the State will carry out the assurance under Section 676(b)(10) of the CSBG Act from Section 11.3 of this plan. **[Pre-populated from Item 11.3]**

DOS program analysts conduct an annual review of agency by-laws to ensure this provision is included. In addition, program analysts conduct yearly Board reviews to verify compliance. Analysts also receive Board packets from their assigned entities, which identify any petitions for representation and the discussion thereof.

Eligible Entity Community Action Plans and Community Needs Assessments

14.11. As required by the State's assurance under Section 676(b)(11) of the CSBG Act, has or will the State secure a Community Action Plan from each eligible entity that is for the duration of this State plan that includes a community-needs assessment? You may upload additional information and/or community action plans. **[Select "yes" or "no" and attach supporting documentation if applicable]**

☒ Yes ☐ No

See also, Attachment 8: Supplemental Response to Section 14.11 – CSBG Contract Work Plan Package

State and Eligible Entity Performance Measurement: ROMA or Alternate system

14.12. Will the State and all eligible entities participate in the Results Oriented Management and Accountability System (ROMA), as required by the assurance under Section 676(b)(12) of the CSBG Act? (This item corresponds with Section 11.6 of this plan.) **[Select "yes" or "no" and attach supporting documentation if applicable]**

☒ Yes ☐ No

DOS will continue to build capacity across the network and further cement the use of ROMA principles by: (1) developing and implementing improved monitoring and reporting tools; and, (2) providing training and technical assistance to eligible entity boards and staff. ROMA trainers will use the standardized ROMA curriculum developed by the National ROMA Peer-to-Peer Training Program. DOS program analysts will verify client outcomes to the National Performance Indicators during the semi-annual and annual reviews of the work plan. In addition, DOS contractually requires all eligible entities to comply with ROMA.

Validation for CSBG Eligible Entity Programmatic Narrative Sections

14.13. Click the “validation” button below to ensure the State has described how it will carry out all the assurances under section 676(b), as required by Section 676(b)(13) of the CSBG Act. **[No response for this Item]**

SECTION 15
Federal Certifications

Please attach the following four Federal certifications, each signed by the State authorized CSBG official.

After each assurance, a check box must be selected.

15.1 Lobbying

☒ By checking this box, the prospective primary participant is providing the certification set out above.

15.2 Drug-Free Workplace Requirements

☒ By checking this box, the prospective primary participant is providing the certification set out above.

15.3 Debarment

☒ By checking this box, the prospective primary participant is providing the certification set out above.

15.4 Environmental Tobacco Smoke

☒ By checking this box, the prospective primary participant is providing the certification set out above.

See Attachment 9: Response to Section 15.1-15.4 – Federal Certifications

Attachment 1: Response to Section 1.3 – Designation Letter

September 1, 2015

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Ms. Jeanne Chaffin, Director
Office of Community Services
Administration for Children and Families
US Department of Health and Human Services
370 L'Enfant Promenade, SW
5th Floor, West Wing
Washington, DC 20447

RE: Letter of Designation for the New York State Community Services Block Grant Program

Dear Ms. Chaffin:

In accordance with Public Law 105-285 § 676(a)(1), the New York State Department of State is hereby designated as the lead agency for the Community Services Block Grant (CSBG) and related programs in New York State, with responsibilities as detailed in the State's CSBG Application and Plan.

The New York State Secretary of State shall be the designated State CSBG Official to receive the CSBG grant award on behalf of the Department of State. The Director of the Division of Community Services within the Department of State shall be the CSBG Program Contact Person for purposes of this grant award. The contact information for these designated officials is as follows:

State CSBG Official:
Cesar A. Perales
Secretary of State
New York State Department of State
One Commerce Plaza, Suite 1100
Albany, New York 12231-0001

CSBG Program Contact Person:
Veronica Cruz
Director, Division of Community Services
New York State Department of State
One Commerce Plaza, Suite 1020
Albany, New York 12231-0001

Sincerely,

Attachment 2: Response to Section 2.3 – New York State Executive Law Article 6-D and 19 NYCRR Parts 700 and 701

McKinney's Consolidated Laws of New York Annotated Currentness
Executive Law (Refs & Annos)
Chapter Eighteen. Of the Consolidated Laws
➡ Article 6-D. Community Services Block Grant Program (Refs & Annos)

§ 159-e. Definitions

When used in this article:

1. "Eligible entity" shall mean any organization

(a) officially designated as a community action agency or a community action program under the provisions of section two hundred ten of the economic opportunity act of 1964 [FN1] for fiscal year 1981, unless such community action agency or a community action program lost its designation under section two hundred ten of such act as a result of a failure to comply with the provisions of such act; or

(b) designated by the process described in section one hundred fifty-nine-m of this article (including an organization serving migrant or seasonal farmworkers that is so described or designated).

Such eligible entity shall have a tripartite board as its governing board which fully participates in the development, planning, implementation, and evaluation of the program to serve low-income communities and through which the entity shall administer the community services block grant program. However, such eligible entities which are public organizations shall have either a tripartite board or 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 funded under this article.

2. "Tripartite board" shall mean

(a) the governing board of a private nonprofit entity selected by the entity and composed so as to assure that

(1) one-third of the members of the board are elected public officials, holding office on the date of selection, or their representatives, except that if the number of such elected officials reasonably available and willing to serve on the board is less than one-third of the membership of the board, membership on the board of appointive public officials or their representatives may be counted in meeting such one-third requirement;

(2)(A) not fewer than one-third of the members are persons chosen in accordance with democratic selection procedures adequate to assure that these members are representative of low-income individuals and families in the neighborhood served; and

(B) each representative of low-income individuals and families selected to represent a specific neighborhood within a community under clause (A) of this subparagraph resides in the neighborhood represented by the member; and

(3) the remainder of the members are officials or members of business, industry, labor, religious, law enforcement, education, or other major groups and interests in the community served; or

(b) the governing board of a public organization, which shall have members selected by the organization and shall be composed so as to assure that not fewer than one-third of the members are persons chosen in accordance with democratic selection procedures adequate to assure that these members

(1) are representative of low-income individuals and families in the neighborhood served;

(2) reside in the neighborhood served; and

Attachment 2: (continued)

(3) are able to participate actively in the development, planning, implementation, and evaluation of programs funded under this article.

3. "Indian tribes" and "tribal organizations" shall mean those tribes, bands or other organized groups of Indians recognized in the state or considered by the federal secretary of the interior to be an Indian tribe or an Indian organization for any purpose.

4. "Community based organization" shall mean any organization incorporated for the purpose of providing services or other assistance to economically or socially disadvantaged persons within its designated community. Such organization must have a board of directors of which more than half of the members reside in such designated community.

5. "Department" shall mean the department of state.

6. "Secretary" shall mean the secretary of state.

[FN1] 42 USCA § 2790 (repealed).

§ 159-f. Functions, powers and duties of the secretary

The secretary or his duly authorized officers or employees, shall have the following functions, powers and duties:

1. To act as the official agent of the state for the purpose of administering, carrying out and otherwise cooperating with the federal government in connection with the federal community services block grant act of 1981 [FN1], as amended;

2. To allocate federal community services block grant funds pursuant to contracts with recipients of such funds in the manner required by federal law and regulation;

3. To assist the governor in applying for the state's allocation under the federal community services block grant act [FN1], including the fulfillment of any planning requirements;

4. To cooperate with the legislature in conducting hearings required by the federal community services block grant act [FN1]; and

5. To monitor and evaluate the use of funds received by the state pursuant to the federal community services block grant act [FN1].

[FN1] 42 USCA § 9901 et seq.

§ 159-g. Rules and regulations

The secretary shall promulgate rules and regulations necessary to carry out the provisions of this article.

§ 159-h. Limitation of administrative costs

Not more than five percent of the community services block grant funds received by the state shall be retained for administration at the state level.

§ 159-i. Distribution of funds

Attachment 2: (continued)

At least ninety percent of the community services block grant funds received by the state shall be distributed pursuant to a contract by the secretary to eligible entities as defined in subdivision one of section one hundred fifty-nine-e of this article. Each such eligible entity shall receive the same proportion of community services block grant funds as was the proportion of funds received in the immediately preceding federal fiscal year under the federal community services block grant program as compared to the total amount received by all eligible entities in the state, under the federal community services block grant program.

The secretary shall, pursuant to section one hundred fifty-nine-h of this article, retain not more than five percent of the community services block grant funds for administration at the state level.

The remainder of the community services block grant funds received by the state shall be distributed pursuant to a contract by the secretary in the following order of preference: a sum of up to one-half of one percent of the community services block grant funds received by the state to Indian tribes and tribal organizations as defined in this article, on the basis of need; and to community based organizations. Such remainder funds received by eligible entities will not be included in determining the proportion of funds received by any such entity in the immediately preceding federal fiscal year under the federal community services block grant program.

§ 159-j. Local share

Each recipient of funds shall secure a local share equivalent to twenty-five percent of federal funds received under the community services block grant. Such local share may be in cash or in kind, fairly evaluated including but not limited to donated plant, equipment and services. The secretary may waive all or part of this requirement upon an application made and upon good cause shown by the recipient.

§ 159-k. Monitoring and evaluation

1. The secretary shall monitor and evaluate the use of community services block grant funds made available pursuant to this article by the recipients of such funds in order to evaluate the performance of such recipients. Evaluations shall include, but not be limited to:

(a) determining the effectiveness of recipients' administrative operations, organizational structure, planning and programming, self evaluation, and general decision making; and

(b) reviewing the recipients' compliance with federal and state law and regulation.

2. For purposes of evaluations conducted under this section, recipients shall make available to the secretary, or any duly authorized officer or employee of the department, appropriate books, documents, papers and records for examination, copying or mechanical reproduction on or off the premises of the recipient upon a reasonable request therefor.

§ 159-*l*. Decertification and reduction of entity shares

1. Any eligible entity that received funding in the previous federal fiscal year through a community services block grant made under this article shall not have its funding terminated under this article or reduced below the proportional share of funding the entity received in the immediately preceding federal fiscal year, as determined pursuant to section one hundred fifty-nine-i of this article, 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 of the United States department of health and human services. For purposes of making a determination that cause exists for:

Attachment 2: (continued)

(a) a funding reduction, the term "cause" shall include

(1) a statewide redistribution of funds provided through a community services block grant under this article to respond to

(A) the results of the most recently available census or other appropriate data;

(B) the designation of a new eligible entity; or

(C) severe economic dislocation; and

(2) the failure of an eligible entity to comply with the terms of an agreement or a state plan, or to meet a state requirement, as described in this section; or

(b) a termination, the term "cause" includes the failure of an eligible entity to comply with the terms of an agreement or a state plan, or to meet a state requirement, as described in this section.

2. If the state determines, on the basis of a final decision in a review pursuant to this article, that an eligible entity fails to comply with the terms of an agreement or the state plan to provide services under this article or to meet appropriate standards, goals, and other requirements established by the state (including performance objectives), the state shall:

(a) inform the entity of the deficiency to be corrected;

(b) require the entity to correct the deficiency;

(c)(1) offer training and technical assistance, if appropriate, to help correct the deficiency, and prepare and submit to the secretary of the United States department of health and human services a report stating the reasons for the determination; or

(2) if the state determines that such training and technical assistance are not appropriate, it shall prepare and submit to the secretary of the United States department of health and human services a report stating the reasons for the determination;

(d)(1) at the discretion of the state (taking into account the seriousness of the deficiency and the time reasonably required to correct the deficiency), allow the entity to develop and implement and submit to the state, within sixty 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

(2) not later than thirty days after receiving from an eligible entity a proposed quality improvement plan pursuant to subparagraph one of this paragraph, either approve such proposed plan or specify the reasons why the proposed plan cannot be approved; and

(e) after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding under this article of the eligible entity unless the entity corrects the deficiency.

3. A determination to terminate the designation or reduce the funding of an eligible entity pursuant to subdivision two of this section is reviewable by the secretary of the United States department of health and human services, pursuant to the processes set forth in the federal community services block grant act of 1981, as amended.

§ 159-m. Designation and redesignation of eligible entities in unserved areas

1. Qualified organization in or near area. (a) In general. If any geographic area of the state is not, or ceases to be, served by an eligible entity under this article, and if the governor decides to serve such area, the governor may solicit applications from, and designate as an eligible entity

(1) a private nonprofit organization (which may include an eligible entity) that is geographically located in the unserved area, that is capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency, and that meets the requirements of this article; and

(2) a private nonprofit eligible entity that is geographically located in an area contiguous to or within reasonable proximity of the unserved area and that is already providing related services in the unserved area.

(b) Requirement. In order to serve as the eligible entity for the area, an entity described in subparagraph two of paragraph (a) of this subdivision shall agree to add additional members to the board of the entity to ensure adequate representation

(1) in each of the three required categories described in paragraph (a) of subdivision two of section one hundred fifty-nine-e of this article, by members that reside in the community comprised by the unserved area; and

(2) in the category described in subparagraph two of paragraph (a) of subdivision two of section one hundred fifty-nine-e of this article, by members that reside in the neighborhood to be served.

2. Special consideration. In designating an eligible entity under subdivision one of this section, the governor shall grant the designation to an organization of demonstrated effectiveness in meeting the goals and purposes of this article and may give priority, in granting the designation, to eligible entities that are providing related services in the unserved area, consistent with the needs identified by a community-needs assessment.

3. No qualified organization in or near area. If no private, nonprofit organization is identified or determined to be qualified under subdivision one of this section to serve the unserved area as an eligible entity the governor may designate an appropriate political subdivision of the state to serve as an eligible entity for the area. In order to serve as the eligible entity for that area, the political subdivision shall have a tripartite board or other mechanism as required in section one hundred fifty-nine-e of this article.

§ 159-n. Report of the Secretary

The secretary of state shall report to the governor and the legislature by March fifteenth of each year on the administration of the community services block grant program. The report shall include, but not be limited to, the results of the monitoring and evaluation of recipients of funds under the program and any recommendation for changes which the secretary of state deems necessary for the effective administration of the program.

Current through L.2015, chapters 1 to 13
END OF DOCUMENT

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Attachment 2: (continued)

Compilation of Codes, Rules and Regulations of the State of New York Currentness
Title 19. Department of State
Chapter XIV. Division of Economic Opportunity
➡ Part 700. Community Services Block Grant (Csbg) Hearing Rules of Procedure (Refs & Annos)

Section 700.1. Scope and purpose

(a) This Part applies to all adjudicatory proceedings commenced by service of a preliminary determination of funding action upon public or private grantees which receive or are entitled to receive Community Services Block Grant (CSBG) entitlement funds under P.L. 97-35, as amended, and Article 6-D, Executive Law, section 159-i, as amended.

(b) The purpose of this Part is:

(1) to comply with P.L. 97-35, as amended by P.L. 98-558, with respect to terminations of present and future funding; and

(2) to provide particular CSBG grantees with notice and an opportunity for a hearing on the record of the department's preliminary determination of funding action for a statutory allocation of CSBG entitlement funds for cause.

(c) This Part applies to any grantee receiving its statutory allocation of CSBG entitlement funds under Executive Law, section 159-i, as amended, as allocated to the State in PL 97-35, as amended. This Part does not apply to the remainder of CSBG funds, commonly referred to as "discretionary" funds, which may be received by a grantee or other statutorily specified entity.

Section 700.2. Definitions

As used in this Part:

(a) **Department.** The Department of State.

(b) **Entitlement funds.** The statutory allocation proportion of CSBG funds received by a "grantee" under P.L. 97-35, as amended, and Executive Law, section 159-i, as amended.

(c) **Grantee.** Any public or private "grantee" as defined in Executive Law, section 159-e(1), as amended.

(d) **Suspension.** A decision for cause by the department to temporarily curtail the statutory allocation of CSBG entitlement funds in part prior to the termination date of a CSBG entitlement contract.

(e) **Termination.** A decision for cause by the department that the present or future CSBG funding to a CSBG grantee, which received CSBG entitlement funds in the previous fiscal year, shall be permanently terminated, in whole or in part.

Section 700.3. Grounds for funding action

(a) *Future funding action.* A grantee's application for future CSBG funding may be permanently rejected when there has been (1) substantial failure, or (2) repeated or successive failure, by a grantee to comply with any provision of (i) law, (ii) rule, regulation or program instruction issued by the department, or (iii) a term or condition of a current or prior CSBG entitlement contract with the department. The ground for substantial failure under this subdivision shall include the abandonment by a grantee of the services to be performed under a CSBG entitlement contract, in whole or in part, for a previous fiscal year in accordance with subdivision (b) or (c) of his section. In the absence of unusual circumstances, an application for future CSBG funding shall not be rejected for this cause

Attachment 2: (continued)

unless the department has given the grantee notice, as set forth in section 700.4 of this Part, of one or more of the two grounds for rejection and reasonable opportunity to take effective corrective action.

(b) *Present funding action.* A CSBG entitlement contract may be permanently terminated, in whole or in part, for cause, when there has been (1) substantial failure, or (2) repeated or successive failure, by a grantee to comply with a provision of (i) law, (ii) rule, regulation or program instruction issued by the department, or (iii) a term or condition of a current or prior CSBG contract with the department. The ground for substantial failure under this subdivision shall include the abandonment by a grantee of the services to be performed under a CSBG entitlement contract, in whole or in part. Failure of the grantee to resume performance of the services abandoned under a CSBG entitlement contract, within 20 days after receipt of a notice of funding action in accordance with section 700.4 of this Part, on the ground of substantial failure by abandonment, shall be deemed refusal by such grantee to take effective corrective action. In the absence of unusual circumstances, a CSBG entitlement contract shall not be permanently terminated, in whole or in part, for this cause unless the Department has given the grantee notices as set forth in section 700.4, of one or more of the two grounds for permanent termination and reasonable opportunity to take effective corrective action.

(c) *Contract suspension funding action.* A CSBG entitlement contract may be suspended, in whole or in part, for cause, when there has been (1) substantial failure, or (2) repeated or successive failure, by a grantee to comply with a provision of (i) law, (ii) rule, regulation or program instruction issued by the department, or (iii) a term or condition of a current or prior CSBG entitlement contract with the department. The ground for substantial failure under this subdivision shall include the abandonment by a grantee of the services to be performed under a CSBG entitlement contract. Failure of the grantee to resume performance of the services abandoned under a CSBG entitlement contract, within 20 days after receipt of a notice of funding action in accordance with section 700.4 of this Part, on the ground of substantial failure or abandonment shall be deemed refusal by such grantee to take effective corrective action. In the absence of unusual circumstances, a CSBG entitlement contract shall not be suspended, in whole or in part, for this cause unless the department has given the grantee notice as set forth in section 700.4, of one or more of the two grounds for suspension and reasonable opportunity to take effective corrective action.

(d) This Part does not apply to:

(1) terminations or reductions, in whole or in part, of present or future CSBG funding, which are required by or will implement a provision of Federal or State law; or

(2) contract payments made in accordance with State Finance Law, article XI-A, as amended, also commonly referred to as the Prompt Payment Law; or

(3) demand for reimbursement by the department for disallowed costs when a grantee has received payment of CSBG funds under a CSBG entitlement contract; or

(4) Audit resolution process.

Section 700.4. Notice of preliminary determination

(a) When the department has reason to believe that one or more grounds for funding action exist as set forth in section 700.3(a), (b) or (c), the department shall serve upon the grantee a written preliminary determination of funding action, by certified mail, return receipt requested, which shall state the ground(s) for the proposed action and shall identify with reasonable specificity any facts or documents relied upon as a basis for that action.

(b) The preliminary determination shall advise the grantee that it has the opportunity within 20 business days of receipt of the preliminary determination, to make a written request for an adjudicatory hearing under this Part.

Attachment 2: (continued)

(c) The preliminary determination shall also advise the grantee of its right, if any, to continued funding under section 700.8 of this Part for funding action which falls within section 700.3(a) or (b).

(d) If the grantee advises the department in writing that it will not request a hearing or fails to request a hearing within the time prescribed in subdivision (b) of this section, or fails to resume performance of the services abandoned as set forth in section 700.3(b) or (c) of this Part, the department's preliminary determination of funding action under section 700.3(a), (b) or (c) shall become final and effective.

Section 700.5. Initiation of hearing

Upon receipt of a grantee's written request for a hearing under section 700.4 of this Part, the hearing officer unit of the department shall schedule the hearing and notify the grantee of the date, time, and place for the hearing.

Section 700.6. State Administrative Procedure Act applications

Any hearing under this Part shall be conducted in accordance with the New York State Administrative Procedure Act (SAPA), as amended.

Section 700.7. Review of department decision

(a) No funding determination based on section 700.3(a) or (b) of this Part shall become final and effective until a finding is made by the Secretary of the United States Department of Health and Human Services in accordance with P.L. 97-35, as amended by P.L. 98-558, confirming the department's decision.

(b) Additionally, any hearing decision of the department resulting in a termination of present or future funding to a grantee as prescribed in section 700.3(a) or (b) of this Part shall upon written request made within 20 business days of receipt of the department's decision be reviewed by the Secretary of the United States Department of Health and Human Services in accordance with P.L. 97-35, as amended by P.L. 98-558.

Section 700.8. Funding pending appeal decision

In accordance with P.L. 97-35, as amended by P.L. 98-558, the statutory allocation of CSBG entitlement funds to a grantee which has requested a hearing under section 700.3(a) or (b) of this Part shall continue until a finding is made by the Secretary of the United States Department of Health and Human Services, confirming the State's determination of cause, in whole or in part.

Section 700.9. Professional service costs

Costs of legal, accounting and consulting services, and related costs incurred in connection with an adjudicatory proceeding under this Part are not allowable costs under CSBG entitlement funds received by the grantee.

Current with amendments included in the New York State Register, Volume XXXVII, Issue 12, dated March 25, 2015.
END OF DOCUMENT

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Attachment 2: (continued)

Compilation of Codes, Rules and Regulations of the State of New York Currentness
Title 19. Department of State
Chapter XIV. Division of Economic Opportunity
➡ Part 701. Community Services Block Grant Advisory Council (Refs & Annos)

Section 701.1. Creation and membership

The Community Services Block Grant Advisory Council (hereinafter Council), is hereby created in the Department of State. The Council shall have twenty members, to include representatives from local governments, private non-profit providers and the public. Ten members shall be appointed by the Governor, five by the Temporary President of the Senate, and five by the Speaker of the Assembly. Members shall serve at the pleasure of their appointing authority.

Section 701.2. Duties

The Council shall have the following duties:

(a) to assist low-income persons overcome the barriers of poverty. This may include providing services to individuals or performing activities intended to achieve institutional change;

(b) to consult with the Secretary of State in the preparation of reports, and development of applications and the CSBG plan;

(c) to advise the Secretary of State on strategies and activities to achieve these goals by either responding to actions proposed by the Secretary or suggesting new initiatives to the Secretary; and

(d) to adopt and amend bylaws necessary to address the appointment and terms of Council officers and their duties, meetings of the Council, attendance by members, and other matters incidental to the Council's duties and proper functioning.

Section 701.3. Council Secretary

The Council Secretary shall be an employee of the Department of State designated by the Secretary of State and shall perform those duties assigned to him or her in the Council bylaws and by the Secretary of State.

Current with amendments included in the New York State Register, Volume XXXVII, Issue 12, dated March 25, 2015.
END OF DOCUMENT

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Attachment 3: Response to Section 4.4 – Supporting documentation for the public and legislative hearings

(To Be Completed After Combined Hearing)

- State Register
- Email communication with CSBG funded entities
- Public Hearing Reply Form

Attachment 4: Response to Section 10.1 – Proposed Quarterly Monitoring Schedule and Dates of Last Comprehensive Organization Review and Evaluation (CORE) Completed

Proposed Quarterly Monitoring Schedule		
CSBG Eligible Entity	***Review Type***	***Target Dates***
Albany County Opportunity, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Allegany County Community Opportunities and Rural Development, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Opportunities for Broome, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Cattaraugus Community Action, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Cayuga/Seneca Community Action Agency, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Chautauqua Opportunities, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Economic Opportunity Program, Inc. of Chemung County	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Opportunities for Chenango, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Joint Council for Economic Opportunity of Clinton and Franklin Counties, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Columbia Opportunities, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Cortland County Community Action Program, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Delaware Opportunities, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Dutchess County Community Action Agency, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Community Action Organization of Erie County, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Adirondack Community Action Programs, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Fulmont Community Action Agency, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Community Action of Greene County, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Community Action Planning Council of Jefferson County, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Lewis County Opportunities, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Livingston County Board of Supervisors (Community Initiatives Council)	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Community Action Program for Madison County, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Action for a Better Community, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Economic Opportunity Commission of Nassau County, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Niagara Community Action Program, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4

Attachment 4: (continued)

Proposed Quarterly Monitoring Schedule		
CSBG Eligible Entity	***Review Type***	***Target Dates***
New York City Department of Youth and Community Development	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Mohawk Valley Community Action Agency, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
People's Equal Action and Community Effort, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Regional Economic Community Action Program, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Community Action of Orleans and Genesee, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Oswego County Opportunities, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Opportunities for Otsego, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Commission on Economic Opportunity for the Greater Capital Region, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
PathStone Corporation	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Saratoga County Economic Opportunity Council, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Schenectady Community Action Program, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Schoharie County Community Action Program, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Pro Action of Steuben and Yates, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
St. Lawrence County Community Development Program, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Economic Opportunity Council of Suffolk, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Community Action Commission to Help the Economy, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Tioga Opportunities, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Tompkins Community Action, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Ulster County Community Action Committee, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Warren-Hamilton Counties Action Committee for Economic Opportunity, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Washington County Economic Opportunity Council, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Wayne County Action Program, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Westchester Community Opportunity Program, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Wyoming County Community Action, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4
Yonkers Community Action Program, Inc.	Quarterly Monitoring	FFY 1 Q1-Q4 and FFY 2 Q1-Q4

Attachment 4: (continued)

Dates of Last Triennial Onsite Assessment - Comprehensive Organization Review and Evaluation (CORE)			
CSBG Eligible Entity	***Review Type***	***Target Date***	***Date of Last Full Onsite Review***
Albany County Opportunity, Inc.	Triennial	11/2017	11/18/2014
Allegany County Community Opportunities and Rural Development, Inc.	Triennial	6/2015	6/4/2012
Opportunities for Broome, Inc.	Triennial	6/2015	6/12/2012
Cattaraugus Community Action, Inc.	Triennial	8/2015	8/15/2012
Cayuga/Seneca Community Action Agency, Inc.	Triennial	2/2016	2/5/2013
Chautauqua Opportunities, Inc.	Triennial	8/2015	8/13/2012
Economic Opportunity Program, Inc. of Chemung County	Triennial	10/2016	10/22/2013
Opportunities for Chenango, Inc.	Triennial	1/2017	1/7/2014
Joint Council for Economic Opportunity of Clinton and Franklin Counties, Inc.	Triennial	6/2016	6/25/2013
Columbia Opportunities, Inc.	Triennial	4/2016	4/9/2013
Cortland County Community Action Program, Inc.	Triennial	7/2016	7/16/2013
Delaware Opportunities, Inc.	Triennial	5/2016	5/7/2013
Dutchess County Community Action Agency, Inc.	Triennial	1/2017	1/14/2014
Community Action Organization of Erie County, Inc.	Triennial	4/2017	4/8/2014
Adirondack Community Action Programs, Inc.	Triennial	4/2018	4/7/2015
Fulmont Community Action Agency, Inc.	Triennial	5/2018	5/12/2015
Community Action of Greene County, Inc.	Triennial	10/2015	10/23/2012
Community Action Planning Council of Jefferson County, Inc.	Triennial	5/2016	5/21/2013
Lewis County Opportunities, Inc.	Triennial	4/2018	4/15/2015
Livingston County Board of Supervisors (Community Initiatives Council)	Triennial	8/2016	8/13/2013
Community Action Program for Madison County, Inc.	Triennial	10/2017	10/21/2014
Action for a Better Community, Inc.	Triennial	6/2017	6/3/2014
Economic Opportunity Commission of Nassau County, Inc.	Triennial	9/2017	9/30/2014
Niagara Community Action Program, Inc.	Triennial	3/2016	3/19/2013
New York City Department of Youth and Community Development	Triennial	5/2017	5/6/2014
Mohawk Valley Community Action Agency, Inc.	Triennial	7/2016	7/30/2013
People's Equal Action and Community Effort, Inc.	Triennial	9/2017	9/9/2014
Regional Economic Community Action Program, Inc.	Triennial	8/2017	8/12/2014
Community Action of Orleans and Genesee, Inc.	Triennial	4/2016	4/16/2013
Oswego County Opportunities, Inc.	Triennial	6/2016	6/11/2013
Opportunities for Otsego, Inc.	Triennial	3/2018	3/10/2015
Commission on Economic Opportunity for the Greater Capital Region, Inc.	Triennial	9/2016	9/10/2013
PathStone Corporation	Triennial	1/2016	1/15/2013
Saratoga County Economic Opportunity Council, Inc.	Triennial	10/2015	10/16/2012
Schenectady Community Action Program, Inc.	Triennial	6/2017	6/24/2014
Schoharie County Community Action Program, Inc.	Triennial	2/2016	2/19/2013
Pro Action of Steuben and Yates, Inc.	Triennial	9/2015	9/25/2012
St. Lawrence County Community Development Program, Inc.	Triennial	4/2018	4/13/2015
Economic Opportunity Council of Suffolk, Inc.	Triennial	5/2018	5/12/2015
Community Action Commission to Help the Economy, Inc.	Triennial	4/2018	4/23/2015
Tioga Opportunities, Inc.	Triennial	4/2017	4/22/2014
Tompkins Community Action, Inc.	Triennial	9/2016	9/17/2013
Ulster County Community Action Committee, Inc.	Triennial	10/2017	10/7/2014
Warren-Hamilton Counties Action Committee for Economic Opportunity, Inc.	Triennial	3/2016	3/5/2013
Washington County Economic Opportunity Council, Inc.	Triennial	9/2015	9/11/2012
Wayne County Action Program, Inc.	Triennial	10/2016	10/8/2013

Attachment 4: (continued)

Dates of Last Triennial Onsite Assessment - Comprehensive Organization Review and Evaluation (CORE)			
CSBG Eligible Entity	***Review Type***	***Target Date***	***Date of Last Full Onsite Review***
Westchester Community Opportunity Program, Inc.	Triennial	2/2017	2/11/2014
Wyoming County Community Action, Inc.	Triennial	6/2015	6/6/2012
Yonkers Community Action Program, Inc.	Triennial	9/2017	9/16/2014

Department of State

Community Services Block Grant

Program and Fiscal Monitoring Process And Guidelines

Effective Date: October 1, 2015

REVISED TO COMPLY WITH NEW STATE ACCOUNTABILITY MEASURES

One Commerce Plaza
99 Washington Avenue, Suite 1020
Albany, NY 12231
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April 27, 2015

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Overview

The CSBG program was created to address the causes and conditions of poverty in communities. Through a network of 49 Community Action Agencies and 3 Indian Tribes, a range of services is provided to meet the needs of low-income New Yorkers in all of New York's 62 counties. Department of State, Division of Community Services (DOS-DCS) provides direction and support to local agencies to ensure that comprehensive services are provided.

As the CSBG administering agency, DOS-DCS establishes goals and objectives which guide program evaluation, monitoring, and oversight. DOS-DCS ensures compliance with Federal and State statutes, laws, policies, and procedures. DOS-DCS is the primary liaison with grantees, monitoring the programs as well as offering training and technical assistance in areas such as governance, management, and program operations.

Program and Fiscal Monitoring

In FFY 2015 DOS-DCS revised its monitoring procedures to address new accountability measures established by HHS. These changes will be implemented beginning in FFY 2016 (October 1, 2015).

DOS-DCS implements a three-pronged approach to monitoring. The first prong consists of routine, periodic on-site visits. The second prong is the federally mandated comprehensive assessment process conducted tri-annually. The third is an annual compliance review of the grantee organizational standards. Routine monitoring and the triennial assessment process utilize a comprehensive approach to reviewing, assessing, and evaluating CSBG grantees with the goal of improving the quality of services provided to individuals, children, families, and communities. Monitoring is proactive, result-oriented, and conducted to provide assistance to grantees to improve their capacity to achieve measurable results, and to meet the requirements of Federal and State authorizing legislation, the CSBG Management Plan, and the CSBG contract. The compliance review for the organizational standards involves an annual self-assessment to be done by the grantee followed by a desk review by DOS-DCS staff.

In accordance with *42 U.S.C. 9901, et seq., Section 678B, as amended*, monitoring activities will be conducted to determine whether eligible entities meet performance goals, administrative standards, financial management standards, and other requirements set by the State.

General Responsibilities

Monitoring, comprehensive assessment and organizational compliance reviews are conducted by community services program analysts and fiscal representatives assigned to individual grantees. DOS-DCS staff assigned to conduct program and fiscal monitoring must possess and demonstrate adequate professional proficiency, including knowledge of:

- ❑ assigned agencies, programs, activities, functions, service areas, organizational structure, and board composition;
- ❑ applicable statutes, rules, regulations, policies and procedures governing programs and organizations; and,
- ❑ CSBG National Goals and National Performance Indicators and their applicability to assigned agencies.

Staff must also:

- ❑ comply with applicable Executive Orders and DOS-DCS Policies and Procedures;
- ❑ communicate clearly and effectively both verbally and in writing;
- ❑ exercise professional care in conducting monitoring activities;
- ❑ base findings and conclusions on objective evaluations of pertinent information;
- ❑ recognize, honor and respect human diversity;
- ❑ preserve the dignity of customers and clients; and,
- ❑ up-hold confidentiality for all information obtained in the course of monitoring.

Staff assigned to monitoring:

- ❑ serve as representatives of the State of New York, Department of State and must actively participate in the administration of CSBG and related programs;

- ❑ assist in implementation of goals and activities outlined in the most recent CSBG Management Plan; and,
- ❑ provide or obtain technical assistance for grantees administering CSBG funds.

Program and Fiscal Monitoring Processes

Pre-Visit Meeting

In order to provide a coordinated, informed and consistent approach to DOS/DCS monitoring of DOS/DCS grantees, assigned staff (fiscal representative and program analyst) shall conduct a pre-site visit meeting prior to all scheduled visits to grantees. The pre-site visit meeting should take place 1-2 weeks prior to any scheduled program or fiscal monitoring visit. It is recommended that when possible these pre-visit meetings be in person however realizing the logistics of staff stationed in regional offices, visits by phone are permissible **(communication by email should not be a substitute for personal communication).**

In preparing for the pre-site visit meeting, involved staffs are responsible for reviewing consolidated monitoring files of prior reports and documentation containing observations, findings, and recommendations made by DOS, other grantee's funding sources, or prior audits. At a minimum, the visits will focus on the following: grantee's response to the quarterly Fiscal and Program Attestation form, fiscal indicators and questions as reported by the program analyst, QIP status, findings and recommendations from previous program and fiscal visits, and information identified in the board meeting packages or through other means.

If there are items of concern, the supervisors should be invited to participate in the discussion. Supervisors should attend pre-site visit meetings of high risk grantees.

Joint Site Visit Protocol

The goal is to develop a coordinated approach to contract monitoring through the implementation of joint site visits by program and fiscal field staff. Joint site visits should occur at least once annually, preferably during the second, third or fourth quarter of each contract year (January – Sept) and should be scheduled based on a mutually acceptable time frame for both program and fiscal field staff. The assigned fiscal representative will join the assigned program analyst on their required quarterly visit. The scope of the visit is to review grantee fiscal data together and meet with grantee staff to gather information related to fiscal areas of concern and issues that pose a threat to the grantee's fiscal health. This will be done by reviewing GSCR fiscal indicators and related documentation together and by meeting with grantee leadership to investigate areas of concern. Staff should also review issues identified on the fiscal and program attestation forms submitted prior to the scheduled visit. This may also include investigation of other areas of concern that may have an impact on CSBG programmatic and fiscal areas. Examples include, but are not limited to, changes in key personnel, information identified in the board meeting packages, or through other means. These areas should be discussed prior to the site visit at the "pre-site visit" meeting to insure that agenda items for the mutual portion of the site visit are understood by both program and fiscal field staff. Each staff person will record the results of the joint and separate visits in their respective field report.

Program Monitoring

Individual Monitoring Plans

An Individual Monitoring Plan (IMP) is developed for each grantee prior to the start of the new program year (during the 4th quarter visit). The purpose of the IMP is to establish and define the partnership between the program analyst and the grantee during a given program year. The IMP will identify the nature and frequency of the program analyst's monitoring and support in response to individual agency needs relating to:

- continuous improvement goals;
- technical assistance requests;
- recommendations from Annual Compliance Review of Organizational Standards (ACROS) or Triennial Review for Accountability and Compliance with Standards (TRACS); and,
- monitor the Work Plan and other contractual obligations.

The Program IMP must identify at least four quarterly on-site visits with the estimated date of the visit, purposes of the visit, and the expected result of each visit. A copy of the IMP must be placed in the agency's DCS contract file. **(See pages 18 – 20)**

The actual date of the visit must be scheduled and confirmed with written communication (e-mail) provided to the executive director at least two weeks before. A copy of the correspondence must be placed in the grantee's contract file (in Albany). In the event of a change or cancellation, the grantee must be provided with adequate written notice of the change and the new date. Program analysts must provide their supervisor with a complete list of scheduled visits for each quarter no later than the end of the first week of each quarter.

Quarterly On-site Program Visits

Every visit includes a meeting with the executive director to go over agency operations as well as specific focus areas. Analysts should plan on reviewing and observing all programs funded primarily with CSBG throughout the course of the year and other funded programs as time allows.

Quarterly on-site visits are conducted according to the following schedule:

I. October – December: Focuses on governance and setting the framework for the year
- Review board file/member documentation
- Observe board function (If schedule does not allow, this can be done during another site visit.)
- Verify the work plan and budget are still relevant based on original contract
- Discuss variances based on desk review and analysis of planned outcomes from the previous year compared to 4th Quarter PPR. This may result in the need for technical assistance or amendment to the current work plan or contract
- Observe at least one CSBG-funded program. Include a review of compliance with income eligibility guidelines (125% of poverty)

II. January – March: **Desk review of the documentation submitted with the Grantee Annual Self-Assessment for compliance with the Organizational Standards. Also conduct desk review and follow up communication associated with data collection and reporting systems.**
- Contact grantee staff to share information on the reporting tools to address contract requirements pertaining to the APR and PPRs. Verify the agency has sufficient means to collect and report on outcomes, and that data is used for planning purposes. Agency will begin the contract with a clear understanding of the information to be collected and reported throughout the year in order to complete the annual program report
- Contact the grantee to verify the Work Plan and Budget are still relevant based on original contract. Verification that the work plan and budget submitted with the contract will be carried out (amendment may be needed if a carry-over funds exist).
- Provide technical assistance with the budget amendment for the revised allocation or carry-over (if applicable). Amendment will be submitted in a timely manner and display prudent use of CSBG resources

III. April – June: Focuses on planning efforts and preparation for CSBG refunding process
- Verify the status of strategic plan, needs assessment and partnerships
- Ensure the planned use of CSBG for the coming year is based on Strategic Planning and Needs Assessment
- Review 2nd Quarter PPR to see if planned outcomes for next year are valid estimates based on six months of experience
- Conduct agency eligibility review for CSBG funding and obtain updated documents (incorporation papers, bylaws, board list personnel policies and procedures, travel policies, indirect cost rate letter). Confirm grantee maintains eligibility for CSBG funding.
- Observe at least one CSBG-funded program. Include a review of compliance with income eligibility guidelines (125% of poverty)

IV. July – September: Focuses on reconciling and closing out current contract and setting monitoring plan for next year
- Remind agency that this is their last chance to modify budget and work plan based on 3rd Quarter PPR
- Verify agency received all payments due to them
- Review final reporting responsibilities and provide technical assistance, if needed, to complete APR
- Create an IMP for next year based on required monitoring, specific needs for training and technical assistance and CORE
- Observe at least one CSBG- funded program. Include a review of compliance with income eligibility guidelines (125% of poverty)

Preparing for the On-site Review

Prior to each on-site visit, the program analyst must review the scope of the visit set forth in the IMP. The program analyst should review a variety of materials in order to be aware of current operations and issues facing the agency. These include, but are not limited to, board meeting minutes and reports sent to the board, PPRs, agency newsletters, reports prepared by the DOS fiscal rep, and the agency website.

Board Review

To maintain eligibility for CSBG funding, each eligible entity must comply with federal and state statutes regarding board

composition and function. Grantees are required to have on file with DOS-DCS a list of current board members. The list must be updated as changes occur and certified annually by the program analyst. re The GSCR will include an affirmation by the program analyst that the list of board of director members appears to be valid and the "Certification of Board List and Board File Review" form must be prepared and submitted with the GSCR (see the attached form, "Certification of Board List and Board File Review" on pages27-28. Certification of the board list occurs as a result of the program analyst's review of individual board member files to determine how they were elected/ selected and length of term on the board; and by tracking appointments/resignations and removals through review of board meeting minutes. If a program analyst is unable to verify this information, it must be documented in the GSCR along with a specific timeframe by which the required information is to be provided. If the information is not provided by the specified time, it is possible that a letter of deficiency could be issued requiring a plan of correction. ***This monitoring requirement applies only to CAAs, not Indian Tribes or CBOs receiving discretionary funding.***

Board Member Tracking

At the beginning of the contract year and as part of the board file review, log each member and sector on the board of directors. Identify each source of documentation provided for the appointment. Verify whether the documentation is sufficient per DOS guidelines for each listed board member. Each quarter, a follow-up/update is conducted to verify the members still active on the board, strike out the members no longer on the board (**DO NOT DELETE)** and add new members seated since the last review. As new members are seated, ensure there is proper documentation on file. A new Board Member Tracking form should be started for each new Federal Fiscal Year. **(See page 28)**

Board and Committee Meetings

Program analysts are required to attend a minimum of one board meeting each federal fiscal year for each assigned agency to observe board function and to share information. Additional visits with board or board committees may be scheduled as determined by the IMP or as needed. Program analysts should receive and read board meeting minutes for all meetings for each assigned agency. Information contained in the board packages should be discussed with the executive director during the grantee update portion of the field visit or more immediately (by telephone) if the information dictates. The "Board Meeting Observations" form that documents observations of the meeting must be prepared and submitted with the GSCR. This monitoring requirement applies only to CAAs, not Indian Tribes or CBOs receiving discretionary funding. **(See page 27)**

Program Review

(Includes all contracts with CSBG funds - Entitlement, Discretionary, Special Project, Disaster Relief, And Technical Assistance)
This is accomplished by reviewing the data provided in the four program progress reports and through on-site observation of the programs in operation. The program analyst should identify the program(s) monitored during the site visit and the progress or challenges faced in meeting the planned outcomes. For programs that are not meeting expected outcomes, the program analyst should identify the cause and document the steps being taken by the grantee to address the under-performance. Programs that are exceeding planned projections should also be noted as to changing conditions that increased demand for the program.

Refunding Process

The Refunding Application package contains all required federal and state forms and documents. The refunding package is sent to the grantee and technical assistance is provided in the third quarter of the program cycle (April-June) so that a complete and correct package is submitted by the due date (approximately June 20th).

Upon submission by the grantee the fiscal representative will review the budget workbook, profile, and work plan summary of financial resources while the program analyst reviews the work plan workbook. Both the program analyst and fiscal representative should review for reasonableness as well as completeness. Special attention must be given to the grantee's planning efforts (Needs Assessment and Strategic Plan), use of CSBG dollars for administration (15% maximum is a target level) and for the grantee's ability to achieve the levels of performance indicated in the Work Plan. The contract review unit (CRU) will review the other documents contained in the refunding package (signatures, MWBE, VRQ, and other contractual documents).

After the Refunding Application package is reviewed by CRU, the assigned program analyst and fiscal representative, the program analyst is responsible for communicating in writing (email) to the agency executive director whether the application was acceptable, or, if not acceptable, listing corrections needed. The assigned program analyst has the primary responsibility for obtaining all necessary corrections prior to sending the Refunding Application package on for the contract review and approval process.

In order for the grantee to receive their first payment, the program analyst and fiscal representative must provide notification that the refunding package was reviewed, approved and complies with funding requirements. This notification is comprised of a GSCR cover page, any e-mail correspondence between the program analyst, grantee and fiscal representative, and the IMP. (This is a contractual requirement described in Appendix C of the contract document).

The Individual Monitoring Plan (IMP) that corresponds to the refunding period must be completed during the 4th Quarter visit. If the 4th quarter visit has taken place before the refunding package is ready for processing, a copy of the IMP should be attached to the refunding documents and GSCR. If the 4th visit is after the refunding package is ready for processing, a separate GSCR will be needed for the IMP.

Regional Meetings

Regional meetings with assigned agencies are allowed and may be held to share information, provide training and technical assistance, determine joint priorities and activities, enhance collaboration and obtain input on state administration. Depending on the nature of these meetings, they may be counted as one of the required on-site visits (e.g. to share information and provide technical assistance on completing the Refunding Application package).

Specialized Technical Assistance and Support

1. To enhance the network's ability to respond to community needs, the Department of State offers all CSBG funded agencies a list of opportunities for training and technical assistance. Technical assistance needs may be identified during the refunding process, after a CORE, or during on-site monitoring. The program analyst is responsible for providing assistance or arranging for outside assistance through NYSCAA or other sources. Special attention will be given for training and technical assistance on the CSBG National Goals and National Performance Indicators, Results Oriented Management and Accountability (ROMA), Organizational Standards or any other requirements as directed by federal or state government.

   A. Training and technical assistance is made continuously available Statewide to CSBG eligible entities through DOS funding to NYSCAA. NYSCAA is under contract with DOS to provide professional development, training and technical assistance to enhance the capacity of agencies to serve as effective and responsive resources for their communities. NYSCAA offers training and technical assistance statewide in the area of human resources, fiscal management, developing and evaluating community partnerships, program evaluation, understanding ROMA and using Logic Models and other issues important to CAAs. Agencies can self-refer or request assistance through their program/fiscal analyst. In certain cases, the Division of Community Services will initiate contact with NYSCAA on behalf of a grantee or with a request that NYSCAA contact a grantee and offer its assistance.

   B. On-site fiscal and programmatic training and assistance are made available and provided directly by the DOS staff to CSBG eligible entities on an as needed basis. Agencies can request program and fiscal training and technical assistance directly from their assigned program and fiscal representatives. Analysts are available to review important Information Memorandums, discuss issues of compliance, and review areas of agency concern. In addition, analysts and fiscal representatives may provide assistance and training while at a grantee's offices during a site visit in instances where grantee issues are noted and immediate onsite training or assistance is practicable.

   C. Additional discretionary funding for training/technical assistance may be available for CSBG eligible entities when deemed appropriate and reasonable by the Department of State. CSBG eligible entities may request discretionary funds to support reasonable training or other assistance costs targeted at bringing the grantee into compliance or preventing non-compliance with the terms and requirements of the CSBG Act. While these funds are limited, requests can be made directly to the Division of Community Services by any CSBG eligible entity at any time. Once a request is received, it is reviewed by a team of fiscal, program and legal staff at the Department of State to determine whether the request is reasonable and appropriate under the circumstances presented.

2. Specialized services and support are provided during and after a disaster or crisis. Agencies are encouraged to become active members of their local emergency management teams. Emergency telephone numbers are maintained by the DOS program analyst for each agency and are routinely updated. Agencies in areas affected by a disaster are contacted by the assigned program analyst and are made aware of the process to access CSBG funds set aside for disaster relief activities.

3. A program analyst may also conduct and/or participate in other reviews, as appropriate, including, but not limited to active participation in Head Start pre-PRISM joint governance reviews at the request of the agency.

Attendance at Grantee Functions

Attendance at grantees' functions as a representative of DOS is encouraged, but must have the approval of the division director. All staff must comply with DOS Policies and Procedures and the Governor's Executive Order. Staff cannot accept complimentary meal tickets. If there is a charge for the event and reimbursement will be requested, staff must obtain approval through a Travel and

Training Request form (TTR). The TTR must be submitted for approval well in advance of attending the event. If attendance will result in overtime, prior approval must be obtained.

Documenting the On-site Review

Every visit (at least quarterly) to a grantee is documented by a Grantee Services Contact Report (GSCR). A GSCR is to be completed for every contract the grantee has with DOS-DCS (including discretionary, special project, technical assistance, and disaster relief contracts). The report is used to document the current operating status, as well as to verify that substantial progress is being made toward achieving the results as stated in the approved Work Plan and, if applicable, the CORE Quality Improvement Plan.

Each quarterly visit for a **CSBG entitlement contract** must include a grantee update with the executive director (or designee) to review the grantee's status in all functional areas (fiscal, governance, planning, human resources, information technology, facilities, and service delivery).

Grantee Services Contact Report (GSCR)

Monitoring Reports (Program)

The GSCR is used to record and document significant contacts with grantees, including on-site visits, telephone calls (to address highly important issues), in-office visits, board meetings, and regional meetings. The GSCR is a public document which is shared with grantees (Executive Director and Board Chair) and is maintained in the agency's DCS contract files in Albany for review by auditors. The GSCR must contain adequate information to document compliance with federal legislation, status of each functional area, and significant progress toward achieving the goals and indicators stated in the CSBG Work Plan. The GSCR may also document the assistance provided by the program analyst and must be stated in terms of outcomes or results achieved. The GSCR forms may be revised as needed in order to address changes in monitoring requirements, (for example recording grantee compliance with new organizational standards or new monitoring requirements for State's), as well as to seek improvements in the information being reported. The forms attached on pages 22-24 were revised in 2015 and are intended to continue the improvements initiated by earlier versions of the forms by increasing efficiency in report writing without sacrificing the quality of monitoring. When forms are modified, the Monitoring Guidelines will also be modified to include the most current version of the reporting tools.

Page 1 of the GSCR is a cover page to be used for any type of contact, but particularly for site visits. Page 1 asks for general and identifying information, such as grantee name, date of contact, contract type, federal fiscal year, contract number, duration of visit, and personnel or board members contacted. This page provides a variety of check boxes to identify the purposes of the visit and the documents attached to the report. (Check all that apply). The program analyst must sign and date this page once the report is completed and other pages/documents are attached.

Pages 2, 3 & 4 of the GSCR are a summary of information obtained as a result of the contact. All sections require clear and objective information.

- ❑ Documents Reviewed – program analysts are required to review progress reports, board packages, newsletters, and other documents submitted by the grantee in preparation for the on-site visit. Note important information contained in these documents on the GSCR and follow up as needed when conducting the site visit. Attach copies of updated eligibility documents if applicable (bylaws, personnel policies, needs assessment, strategic plan, fiscal/travel policies)
- ❑ Grantee Update with Executive Director or designee – Note which staff provided information on each section (Fiscal, Governance, Administrative, Program Planning, other). Address the template of questions created by DCS Program Supervisor each quarter. Additional questions should be added to address information gleaned from documents noted above.
- ❑ Training and Technical Assistance Provided or Obtained – provide a brief description of how the need for T&TA was determined, a description of the T&TA provided or obtained, and the outcomes expected as a result of T&TA.
- ❑ Programs Monitored – a description of the service(s) provided and outcomes achieved by the program. It should include specific information on sources of funding, staffing, locations and times program/service is offered and other information that provides clarity to the reader. Progress or challenges should be explained.
- ❑ Analyst's Summary of Review and Observations – cite instance(s) of compliance and noncompliance, and areas that may require improvement; reference specific documents that support the observation or finding.
- ❑ Recommendations and/or Follow-up Activities, including the Timeframe and Expected Results – should contain recommendations for corrective actions as well as support offered to facilitate compliance; recommendations should be appropriate, feasible, reasonable, and include a time frame for implementation.
- ❑ Date and Purpose/Expected Results of Next Visit – describe briefly. The visit should correspond to the IMP.

Board Related Attachments –

- Certification of Board List and Board File Review Form – This form is designed to report on the documentation reviewed to certify that the board complies with the federal legislation with regard to member composition and selection. It is also designed to report on the board's compliance with its own bylaws regarding the actual selection process for members, meeting frequency, member attendance requirements, and quorum**. (See pages 25-26)**
- Board Meeting Observations Form – This form is designed to report on the actual function of the board. By addressing the questions contained on this form, the reader should have a clear understanding of the board meeting process, meeting documents, issues under discussion, and level of participation by board members. **(See page 27)**
- Board Member Tracking Form**-** This form is designed to identify the source of documentation provided for each board member's appointment and verify whether the documentation is sufficient per DOS guidelines. As a follow-up, each quarter the form logs members leaving and joining the board. As new members are seated, documentation on file is verified. A new form is started for each new Federal Fiscal Year. **(See page 28)**

Preparing and Processing the GSCR

The GSCR should be complete, accurate, objective, and concise. Reports should give readers adequate and correct understanding of the extent and significance of reported findings and observations. These reports are public documents. Information obtained during a site visit or other contact that is deemed confidential should not be included in this report format.

The GSCR is completed by the program analyst within 5 business days of the visit (or with written supervisory approval if more time is needed to prepare the report). The report and any attachments are submitted to the supervisor for review and sign off. The program analyst completes the required GSCR in MS Word and includes individual attachments in PDF. All are forwarded to the supervisor via e-mail.

The supervisor reviews the GSCR and attachments carefully for content and accuracy. The supervisor and program analyst collaborate to edit the report, if needed.

Upon completion of a satisfactory GSCR, the supervisor forwards the e-mail to the bureau manager. The bureau manager reviews and approves the GSCR and attachments and forwards the e-mail to administrative staff (Kathy and Lelia) and back to the assigned program analyst and supervisor.

Administrative staff (Lelia) is responsible for sending a PDF version of the GSCR to the grantee executive director, board chair and fiscal representative. The completed GSCRs must be sent to the grantee within 30 calendar days of the site visit. Administrative staff (Kathy) adds data to the DCS Tracking Spreadsheet and saves the GSCR to the "G" drive, (DCS\Grantees\(listed alphabetically)\FFY 2015\Monitoring Reports – Plans\Program (GSCRs-P) + Attachments).
The administrative staff (Kathy) prints hard copies of the GSCR and attachments and files the copies in the Albany grantee files. [The e-mail is also printed as proof of date received, instead of date stamping the documents.]
It is the responsibility of the program analyst to ensure that: a) all required visits are made each contract year b) supervisors, grantees, and fiscal representatives receive a copy of each report; c) a file for each assigned agency is maintained; and, d) a record of all contacts is available. The supervisor will verify that all required reports are finalized.

Fiscal Monitoring

Fiscal Monitoring Frequency Assessment (FMFA) tool

- ❑ A FMFA will be prepared for each grantee prior to the start of the new program year (during the prior year 4th quarter). The purpose of **t**he FMFA is to identify previously noted areas of concern and items of potential risk that may require increased fiscal monitoring. The recommended minimum number of fiscal visits per year is two. Based upon the scoring of the FMFA, this number may be increased to 3, 4 or more. **(See pages 29-33)**

Fiscal Individual Monitoring Plan (IMP)

An Individual Monitoring Plan (IMP) is developed for each grantee prior to the start of the new program year (during the 4th quarter). The purpose of the IMP is to establish and define the partnership between the fiscal representative and the grantee during a given program year. The Fiscal IMP should identify at least the recommended minimum number of visits identified in the FMFA. It should include information regarding the report which will trigger the visit, purposes of the visit, and the expected result of each visit. A copy of the IMP must be placed in the agency's DCS contact file. (**See pages 34 – 35)**

Preparing for the On-site Review

Fiscal representatives conduct on-site visits for the primary purpose of monitoring expenditure and accountability of CSBG and local share funds. Monitoring includes a general review of the overall fiscal integrity of the grantee, as well as an in-depth review of selected fiscal activities. Samples of grantee expenditures are tested for compliance with the contract and with Generally Accepted Accounting Principles. Fiscal representatives review financial reports submitted to grantee boards of directors. Staff determine adequacy of systems and controls in place to safeguard CSBG funds and determine if these funds are being used according to the approved budget.

In addition to on-site reviews, fiscal representatives provide fiscal technical assistance, as well as review and approval of the annual audits of each CSBG grantee. As a condition of the contract, each recipient must comply with requirements of OMB Circular A-133.

General Responsibilities

1. Follow up on the Grantee Comprehensive Assessment Protocol OR CORE findings (Fiscal Functions section).
2. Make on-site visits and prepare a GSCR-F for distribution to the Executive Director, Finance Director, Board Chair and appropriate DOS staff.
3. Conduct a comprehensive financial assessment.
4. Follow-up on concerns noted in the quarterly Attestation.
5. Provide technical assistance to grantee fiscal staff and finance committee/board members, as needed.
6. Participate in refunding conferences.
7. Collect and review refunding applications, contracts, amendments, financial reports, unaudited financial statements, and OMB required reports.
8. Maintain telephone and/or e-mail contact with grantees.

Performance Standards for Monitoring Activities

1. Assessments are conducted based on agreed upon schedules and according to the processes and procedures stated in the Monitoring Guide. All reports are prepared and submitted in a timely manner. On-going monitoring is conducted to ensure that findings are corrected through the implementation of recommendations made in the reports. When necessary, fiscal support is provided.
2. On-site visits are scheduled based upon submission of CSBG Financial Reports and the needs of the agency as identified in the FMFA. On-site visits should ensure that the expenditures charged to CSBG are in compliance with the contract budget, grant award legislation and OMB Circulars regarding the expenditure of federal grant funds.
3. GSCR-Fs are prepared according to the processes and procedures stated in the Monitoring Guide. Follow-up is conducted as needed to ensure that any findings noted are corrected by implementation of the recommendations made.
4. Technical assistance needs are identified and assistance is provided or training is arranged.

5. The refunding conferences scheduled by DCS are attended by fiscal representatives and information and technical assistance is provided as needed.
6. All documents are collected from grantees and are reviewed in a timely manner. Information provided by grantees is evaluated to determine that expenditures are made in accordance with the CSBG legislation and OMB Circulars.

Scope of Monitoring

On-site Visits

Fiscal representatives will contact assigned grantees to schedule on-site visits. This will be done by telephone or e-mail. The number of visits will vary depending upon the results of the FMFA review and the needs of the grantee.

During the course of the fiscal year, the fiscal representative will conduct a review of the agency's accounting records to ensure that the agency is in compliance with applicable laws and federal regulations. Documents reviewed will include, but not be limited to:

- revenue and expenditure reports
- general ledger transactions detail
- payroll registers and allocation reports
- contract budgets
- bank reconciliations
- indirect cost/cost allocation proposals
- invoices, cancelled checks and other disbursement documentation
- time sheets
- local share documentation (if applicable)
- audit
- balance sheets

Technical assistance will be provided as needed or training opportunities will be brought to the attention of the fiscal officer.

Follow-up on any findings as a result of prior visits or comprehensive assessment will be conducted to verify that corrective actions have been taken.

CSBG Grantee Services Contact Report – Fiscal (GSCR-F)

Monitoring Reports (Fiscal)

The GSCR-F is used to record and document significant contacts with grantees, including on-site visits, telephone calls (to address highly important issues), in-office visits, board meetings, and regional meetings. The GSCR-F is a public document which is shared with grantees (Executive Director, Finance Director and Board Chair) and is maintained in the contract files for review by auditors. The GSCR-F must contain adequate information to document compliance with federal legislation and contractual requirements. The GSCR-F may also document the assistance provided by the fiscal field representative. **(See pages 37-40)**

Content of the GSCR –F:

Page 1 of the GSCR-F is used for general and identifying information, such as grantee name, date of contact, contract type, federal fiscal year, contract number, duration of visit, and personnel or board members contacted. This page provides a variety of check boxes to identify the purposes of the visit (Check all that apply). The first informational box should be completed to indicate if there were any findings noted during the visit, and if so, if non-compliance was noted.
Page 2 of the GSCR-F is used to report all documents reviewed by area of functionality.
Page 3 of the GSCR-F is used to identify and comment on any findings noted. The appropriate check boxes should be selected and "N/R" should be inserted in areas not reviewed during the visit. There is an area for Summary of Communications with Grantee Personnel. This should be used to include information of importance obtained during conversation. The name and title of the grantee personnel should be included.

Page 4 of the GSCR-F begins the summary of review, findings and observations. Recommendations should be made to address any findings noted. If specific follow-up activities are known, they should be listed here. Any training or technical assistance provided or obtained should be described here. The anticipated timeframe and purpose and expected results of the next visit should be listed. A list of documents collected should be included.

Processing the GSCR-F:

The GSCR-F should be complete, accurate, objective, and concise. Reports should give readers adequate and correct understanding of the extent and significance of reported findings and observations. These reports are public documents. Information obtained during a site visit or other contact that is deemed confidential should not be included in this report format.

The GSCR-F is completed by the fiscal field representative in a timely manner. The report and any attachments are submitted to the supervisor for review and sign off via e-mail. The supervisor reviews the GSCR-F and attachments carefully for content and accuracy. If there are no findings noted or findings that do not indicate Non-Compliance, the supervisor requests revisions or signs off and returns to fiscal field representative via email. If a Non-Compliance finding has been noted, the GSCR-F must be forwarded to the CAU Supervisor for review and sign off. Once appropriate approvals have been received, fiscal supervisor forwards the report to the fiscal field representative and DCS administrative staff (Kathy and Lelia). Administrative staff (Lelia) is responsible for sending a PDF version of the GSCR to the following:

Grantee Finance Director
Grantee Executive Director
Grantee Board Chair
Assigned DCS Program Analyst
DCS Supervisor
DCS Bureau Manager
DCS Director
Legal (Non-Compliance Finding)

Administrative staff (Kathy) extracts data from the GSCR-F to add to the DCS Tracking Spreadsheet and it is saved to the "G" drive, (DCS\Grantees\(listed alphabetically)\FFY 2015\Monitoring Reports – Plans\Fiscal (GSCRs-F) + Attachments).

The administrative staff (Kathy) prints hard copies of the GSCR and attachments and files the copies in the Albany grantee files.

Grantee Services Contact Report – Fiscal – Site Visit Attendance Record (GSCR-FA):

The GSCR-FA must be completed during each visit. The grantee name, date of contact, time of contact and site of contact should be completed. Any grantee personnel or board member that contributes relevant information to the GSCR-F should be asked to sign the attendance sheet. The Fiscal Field Representative will sign the certification portion of the form. The GSCR-FA will be appended to the final GSCR-F. (**See page 41)**

Identifying and Reporting Significant Issues Involving CSBG Eligible Entities:

Process for Program Analyst or Fiscal Representative Identifying and Reporting an Area of Concern or Area of Non-Compliance

There are 2 classifications for issues that may require special attention/further action that are identified during a monitoring visit or through other means: **area of concern** and **area of non-compliance.** To determine proper classification and response, consultation may be needed with Program and/or Fiscal Supervisors and DOS legal counsel. Keep in mind that supervisors and legal counsel should be consulted as a matter of course any time non-compliance is found and a Notice of Deficiency (NOD) is contemplated.

Areas of concern

These are issues that are ***not*** attributable to a failure to comply with the terms of a specific applicable law, regulation, rule, cost principle, or contract. They are not violations. Areas of concern are matters of degree, quality, or measure. These issues do not rise to the higher level of non-compliance but require attention because they may be symptoms of a larger problem or may lead to a non-compliance issue in the future.

In the event a matter of concern is raised, DOS will develop recommendations for improvement where appropriate. A letter of concern may be issued to the grantee memorializing the matter, but the matter may also be dealt with through regular monitoring of the grantee and discussions with grantee management. If appropriate, the program analyst or fiscal representative may provide or arrange for technical assistance to address the concern. Follow up will be conducted to monitor progress on the recommendation.

Areas of Non-Compliance

These pertain to issues that can be cited as a failure to comply with a specific applicable law, regulation, term in the contract, OMB cost principle, etc. In addition to noting the non-compliance issue in site visit reports, these issues will generally require a written Notice of Deficiency (NOD) from the State informing the grantee of the non-compliance and the need to correct the issue. The NOD should also discuss whether technical assistance is appropriate under the specific circumstances presented to help the grantee correct the noted deficiencies, and whether a Corrective Action Plan/Quality Improvement Plan will be required.

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 State must follow the guidance set forth in the CSBG Act Sect 678C (42 USC § 9915) and HHS/CSBG Information Memo 116. **(See page 76-81)**

When a potential matter of concern or matter of non-compliance is identified by the program analyst or fiscal representative, it should be discussed with the supervisor as soon as possible and prior to the monitoring report being completed and submitted. In such an instance, a memo (to be emailed) should be prepared by the program analyst/fiscal representative to his/her supervisor (with co-analysts copied) stating the issue, identifying whether it appears to be a matter of concern or matter of non-compliance, and providing a recommendation for future DOS action to address the issue. The supervisor shall share the memo with the bureau/fiscal manager and respond to the program analyst or fiscal representative to facilitate completion of the pending draft GSCR. The bureau/fiscal manager may, upon initial notification and as deemed necessary, raise the matter to the attention of the division director. Any matters that may require Executive-level involvement must be raised to the Division Director (who will be responsible for informing the DOS Executive Office).

Once the supervisor responds to the program analyst or fiscal representative, a discussion of the issue, the related factual findings, and any recommendations for future action should be included in the draft GSCR. The draft GSCR will then be reviewed by the applicable supervisor, manager, and division director. As deemed necessary, the supervisor, manager or director may request assistance from Legal in reviewing a matter.

Preparing a Notice of Deficiency (NOD)

Once identified by a program analyst or fiscal representative, and confirmed by the analyst's or representative's supervisor, issues of non-compliance should be discussed with Legal. If a NOD is issued, it must be either drafted or reviewed and edited by Legal. The NOD should include a clear description of the specific area of non-compliance, the specific statute, regulation, contract term, or cost principle deemed violated, instructions for the improvement or corrective action required, a timeline for implementation and correction, and a discussion of whether DOS intends to offer or arrange for technical assistance or require the grantee to provide a Corrective Action Plan/Quality Improvement Plan. The underlying GSCR and supporting documentation should be provided to Legal in order to facilitate the drafting and/or review of the pending NOD.

Follow up to the NOD will be conducted by the program analyst/fiscal representative based on the timeline specified in the NOD. Follow-up activities include monitoring the grantee's progress on the remediation of the non-compliance, facilitating requests for training and/or technical assistance, and assessing compliance with any applicable approved corrective action or quality improvement plan. When the non-compliance has been fully corrected by the grantee, a

Notice of Satisfaction of Corrective Action should be issued. Like the NOD, this notice should be drafted by or reviewed and edited by Legal prior to issuance.

Additional Steps to Consider When Identifying and Reporting an Area of Concern or Area of Non-Compliance

In instances where areas of concern or areas of noncompliance are discovered by a program analyst or fiscal representative, the analyst/representative and their supervisor should consider whether the issues identified warrant a potential adjustment of a grantee rating (such as a Risk Assessment rating or "At-Risk" designation) or established monitoring schedule. If such an adjustment is discussed and deemed appropriate, program and fiscal supervisors should be consulted; as deemed necessary, Legal should be consulted.

Annual Compliance Review of Organizational Standards

All eligible entities are required to comply with the 58 Organizational Standards identified in HHS Information Memorandum #138 (January 26, 2015). The State is required to verify compliance annually. In guidance to the States, HHS permits the States to verify compliance based on a desk review of a self-assessment conducted by the grantee. For the purpose of creating a uniform process for the grantee self-assessment, DOS-DCS is requiring all eligible entities to use the Organizational Standard Self-Assessment Tool created by the Community Action Partnership.
(http://www.communityactionpartnership.com/storage/cap/documents/OSCOE/Feb%202015/oscoe_self_assessment_private_caas.pdf)
(http://www.communityactionpartnership.com/storage/cap/documents/OSCOE/Feb%202015/oscoe_self_assessment_public_caas.pdf)

Documentation submitted to substantiate compliance will be desk reviewed by the assigned program analyst and fiscal representative. Areas of non-compliance will be identified and training and technical assistance arranged as needed. For standards requiring a longer timeframe to address, a quality improvement plan will be created to monitor progress. The grantee self-assessment will be due January 31st and the desk review will take the place of the 2nd quarter visit.
(See pages 69-72)

Triennial Review for Accountability and Compliance with Standards

Only the cover page, general information and first standard are included for this 89 page document. **(See pages 73-76)**

PURPOSE

Triennial Review for Accountability and Compliance with Standards (TRACS) was created by the New York State, Department of State Division of Community Services in consultation with representatives from the NYS Community Action Association, CSBG Advisory Council, and several Community Action Agencies (CAA). Triennial Review for Accountability and Compliance with Standards was sent to every eligible entity in New York State (NYS) in March 2015. Grantees were encouraged to use this tool as part of an annual self-assessment process.

The purpose of this assessment is two-fold: First to assess for compliance with the Organizational Standards set forth by HHS, Office of Community Services (Information Memorandum 138, Dated January 26, 2015) and second to fulfill the State's requirement under the CSBG Act for a comprehensive on-site assessment of each eligible entity at least once every three years (42 USC § 9914). DOS-DCS has elected to incorporate the requirement for the annual review of the organizational standards with the requirement for a comprehensive on-site review.

Triennial Review for Accountability and Compliance with Standards is based in part on a similar tool created by the Community Action Partnership for States to assess compliance with the organizational standards. The tool was expanded to include indicators which will be used by reviewers to verify that the eligible entity has operationalized

and complied with each standard. In most instances, additional indicators were included to expand on the organizational standard in order to review compliance with State requirements or higher level functions deemed appropriate by the State.

PROCESS

Triennial Review for Accountability and Compliance with Standards will be conducted with all eligible entities on a 3-year cycle. Triennial Review for Accountability and Compliance with Standards (TRACS) will begin implementation in FFY 2015-. Triennial Review for Accountability and Compliance with Standards is a separate process from ongoing program and fiscal monitoring. However, information gained from monitoring will be used to inform the TRACS process; necessary follow up for TRACS will be conducted as part of the ongoing program and fiscal monitoring.

On-site review and assessment will be conducted by a team of analysts, including the assigned program analyst, members of the regional team, and the assigned fiscal representative. Guidance will be provided by the DOS Executive Office and the Office of Counsel as needed.

Sixty calendar days prior to an on-site assessment, DOS will formally send the Triennial Review for Accountability and Compliance with Standards tool to the CEO and board chair of the eligible entity. The eligible entity is responsible for gathering sufficient documentation to support each standard and its corresponding indicators. Within each standard there are suggested documents that may assist in demonstrating compliance. Grantees may wish to and are able to provide other forms of documentation than those listed in order to demonstrate compliance. Once on site, staff from the Department of State will review the documents submitted for each standard and its associated indicators to verify whether the indicators have been met.

It is the responsibility of the eligible entity to provide specific documentation to support each standard and corresponding indicators.

At the conclusion of the on-site review, DOS staff will conduct an exit conference with the CEO, CFO, and board chair to review the results of the assessment and recommendations for future action. The CEO may wish to invite other staff and board members to the exit conference.

RATING:

Two ratings will be assigned to each assessment. One for compliance with the organizational standards and the other for compliance with the indicators. Both ratings are based on the percentage of compliance compared to the total number of standards and total number of indicators which were determined to be “met”.

Overall Compliance Level with State Standards / Indicators (% met)

100% - In Compliance – Excellent Standing
90-99% - Very Good Standing
80-89% - Good Standing
70-79% - Vulnerable
60-69% - At risk

Quality Improvement Plan will be required for scores between 80-99%
Corrective Action Plan will be required for scores of 79% or less

REPORTS:

Draft Report: A discussion draft, including findings, observations, and recommendations, will be provided to the CEO and board chair of the eligible entity electronically within 60 calendar days of the conclusion of the on-site review. The eligible entity will have the opportunity to comment on the content of the draft report. Comments must be received from the grantee within 30 business days upon receipt of the draft report.

If there are serious findings or deficiencies, these must be reported to HHS, Office of Community Services. These include non-compliance with Federal or State laws, non-compliance with eligible entity bylaws, the eligible entity has committed fraud, the eligible entity is in serious financial difficulty, or is not able to provide services. A meeting will

be held with the grantee prior to preparation of the discussion draft. The discussion draft is not a public document. The draft will not be circulated except to the extent required under the Freedom of Information Law (FOIL).

Final Report: Upon receipt of comments, a final report will be prepared and issued to all members of the board of directors and the CEO. The final report will re-state relevant information from the discussion draft, and will include comments received from the grantee. The final report will be available to the public upon written request.

FOLLOW UP:

For grantees with a rating between 80-99%, DOS-DCS will develop a Quality Improvement Plan (QIP) with the eligible entity, listing all the recommendations or next steps included in the final report. For eligible entities with a rating below 70% a Corrective Action Plan will be created and technical assistance will be made available.

DOS-DCS will monitor progress on the Quality Improvement Plan or Corrective Action Plan as part of ongoing program and fiscal monitoring and will issue follow-up and close-out reports. Follow-up on-site visits will be conducted by the assigned program analyst and fiscal field representatives to assure successful implementation of all recommendations.

Attachments

- Individual Monitoring Plans
  - Program IMP – pages 18 - 20
- Grantee Services Contact Reports (GSCR) – pages 21 - 28
  - GSCR (generic)
  - Documentation–Board Certification and Compliance with Grantee
  - Documentation–Board Meeting
  - Board Member Tracking Sheet
- Fiscal Monitoring Frequency Assessment tool – pages 29 - 33
- Individual Monitoring Plans
  - Fiscal IMP – pages 34 - 35
- Grantee Services Contact Report – Fiscal (GSCR-F) – pages 36 - 40
- Grantee Services Contact Report – Fiscal – Site Visit Attendance Record (GSCR-FA): page 41
- CSBG IM 138: Establishment of Organizational Standards for Eligible Entities - pages 42 – 68
- Annual Compliance Review of Organizational Standards (ACROS) –pages 69 -72

- Triennial Review for Accountability and Compliance with Standards (cover page and table of contents only) – pages 73- 75

- CSBG IM 116: Corrective Action, Termination, or Reduction of Funding- pages 76 - 81

Individual Monitoring Plans-Program

Program IMP

Instructions: The assigned program analyst and fiscal representative will create a monitoring plan for each grantee prior to the start of the fiscal year. The plan will address the grantee's needs for technical assistance as well as the required scope of monitoring required by the DOS Monitoring Guide. The IMP is not part to be made part of the GSCR, it is a document to be used for internal purposes.

Grantee Name: **Individual Monitoring Plan by the Program Analyst** **Contract year: 20??**

DATE & TIME	• Scope of Monitoring and Intended Outcomes
First Quarter October –December (based on Board Meeting date)	• **Program Analyst will focus on "governance" and setting the framework for the year** • Conduct a review of board appointment documents to verify compliance with legislative requirement. Conduct a review of bylaws and minutes to verify that the board complies with its own operating procedures (meeting frequency, attendance, quorum, committee work, etc.) Verification of board composition, function and compliance with bylaws • Observe Board Function (If schedule does not allow, this can be done during another site visit.) Verify that the board function includes active participation by all members, there is ample discussion prior to voting, and members appear prepared for the meeting. May be required to impart information to the board on CSBG issues as directed. • Verify the Work Plan and Budget are still relevant based on original contract. Verification that the work plan and budget submitted with the contract will be carried out (amendment may be needed if a carry-over exists). • Meet with staff to share information on the reporting tools to address contract requirements pertaining to the APR and PPRs. Verify the agency has sufficient means to collect and report on outcomes, and that data is used for planning purposes. Agency will begin the contract with a clear understanding of the information to be collected and reported throughout the year in order to complete the annual program report. • **Routine Items for Program Analyst Review (To be done each quarter)** • Agency update with executive director or designee- Learn about changes, challenges, and improvements in functional areas (governance, fiscal, management, human resources, program planning & development, funding, facilities, info technology, etc.) • Observe at least one CSBG funded program - Verify sound operation of and progress of one program funded primarily with CSBG entitlement funds. Verify internal controls to ensure income eligibility and outcome reporting. • Monitor Discretionary funded program (If applicable) Verify progress on Discretionary project/PPR (If applicable) Verify sound operation of and progress of one program funded primarily with CSBG entitlement funds. Verify internal controls to ensure income eligibility and outcome reporting. • Follow up on CORE or TRACS Quality Improvement Plan (If applicable). - Document progress/challenges in addressing QIP recommendations • Provide technical assistance as requested/required in the area of _____ (If applicable) - Document assistance provided and outcome for the grantee.

DATE & TIME	• Scope of Monitoring and Intended Outcomes
Second Quarter January – March DESK REVIEW	**Desk review of the documentation submitted with the Grantee Annual Self-Assessment for compliance with the Organizational Standards. Also conduct desk review and follow up communication associated with data collection and reporting systems.** • Contact grantee staff to share information on the reporting tools to address contract requirements pertaining to the APR and PPRs. Verify the agency has sufficient means to collect and report on outcomes, and that data is used for planning purposes. Agency will begin the contract with a clear understanding of the information to be collected and reported throughout the year in order to complete the annual program report • Contact the grantee to verify the Work Plan and Budget are still relevant based on original contract. Verification that the work plan and budget submitted with the contract will be carried out (amendment may be needed if a carry-over funds exist). • Provide technical assistance with the budget amendment for the revised allocation or carry-over (if applicable). Amendment will be submitted in a timely manner and display prudent use of CSBG resources • **Routine Items for Program Analyst Review by telephone and email (See Scope listed in Q1 above)** • **Joint Visit by Program Analyst and Fiscal Rep -** The scope of the visit is to review grantee fiscal data together and meet with grantee staff to gather information related to fiscal areas of concern and issues that pose a threat to the grantee's fiscal health. This will be done by reviewing GSCR fiscal indicators and related documentation together and by meeting with grantee leadership to investigate areas of concern. Staff should also review issues identified on the Attestation Sheet submitted prior to the scheduled visit. This may also include investigation of other areas of concern that may have an impact on CSBG programmatic and fiscal areas. Examples include, but are not limited to, changes in key personnel, information identified in the board meeting packages, or through other means.

DATE & TIME	• Scope of Monitoring and Intended Outcomes
Third Quarter April - June	• **Program Analyst will focus on planning efforts and preparation for CSBG refunding** • Discuss planned use of CSBG funding for coming year based on Strategic Planning and Needs Assessment. Review strategic plan and needs assessment to ensure they are current or revisions are under way to inform program development and agency operations. • Review 2nd Quarter PPR to see if planned outcomes for next year are valid estimates based on six months of experience. Verify that the PPR is correctly reporting the information needed to complete the annual report. Address any questions and provide technical assistance in updating Work Plan if planned outcomes need to be amended. • Ensure grantee can collect information on client demographics, services provided and customer outcomes and be able to accurately report on these. Verify the accuracy of 1st and 2nd quarter PPRs by testing the internal controls for reporting to ensure grantee's data collection system worked. Verify that the PPR is correctly reporting the information needed to complete the annual report. • Conduct eligibility review and obtain updated agency documents. Obtain a copy of agency policies and procedures as related to eligibility requirements. Confirm grantee maintains eligibility for CSBG funding. Verify that the grantee is still is a viable organization (VRQ certification as part of refunding process) and maintains compliance with tripartite board composition. Update Albany and analyst's files with revisions to any of grantees operating documents (PPP, fiscal manual, bylaws, Incorporation Papers, needs assessment, etc.) • **Routine Items for Program Analyst Review (See Scope listed in Q1 above)** • **Joint Visit by Program Analyst and Fiscal Rep** (if not conducted in Q2)

DATE & TIME	• Scope of Monitoring and Intended Outcomes
Fourth Quarter- July – September	• **Program Analyst will focus on reconciling and closing out current contract and setting monitoring plan for next year** • Verify that all program and financial reports were submitted to guarantee full payment on the contract before 9/30. Verify agency received all payments due to them • Discuss need for amendment with CFO and executive director based on outcomes reported in 3rd Quarter PPR and line items expended in 70% financial report. Determine if amendments are needed to accurately reflect program operations and use of funds • Provide technical assistance regarding reporting requirements -Grantee will submit a 4th PPR as well as APR as part of the final reporting requirement as stated in the contract. Verify that the agency is continuing to collect the information on client characteristics and program outcomes needed to complete the annual report • Create an Individual Monitoring Plan for next year based on required purposes as well as specific needs for training and technical assistance and CORE. The plan will be created to addresses the needs of the agency as well as meeting the contractual monitoring requirements (program and fiscal) • **Routine Items for Program Analyst Review (See Scope listed in Q1 above)** • **Joint Visit by Program Analyst and Fiscal Rep** (if not conducted in Q2 or 3rd)

Instruction for Completing the Grantee Services Contact Report (GSCR)

The GSCR is used to record and document significant contacts with grantees, including on-site visits, telephone calls (to address highly important issues), in-office visits, board meetings, and regional meetings. The GSCR is a public document which is shared with grantees and is maintained in the contract files for review by auditors. The GSCR must contain adequate information to document compliance with federal legislation, status of each functional area, and significant progress toward achieving the goals and indicators stated in the CSBG Work Plan. The GSCR may also document the assistance provided by the program analyst and must be stated in terms of outcomes or results achieved.

Page 1 of the GSCR is a cover page to be used for any type of contact, but particularly for site visits. Page 1 asks for general and identifying information, such as grantee name, date of contact, contract type, federal fiscal year, contract number, duration of visit, and personnel or board members contacted. This page provides a variety of check boxes to identify the purposes of the visit and the documents attached to the report. (Check all that apply). The program analyst must sign and date this page once the report is completed and other pages/documents are attached.

Pages 2, 3 & 4 of the GSCR are a summary of information obtained as a result of the contact. All sections require clear and objective information.

- ❑ Documents Reviewed – program analysts are required to review progress reports, board packages, newsletters, and other documents submitted by the grantee in preparation for the on-site visit. Note important information contained in these documents on the GSCR and follow up as needed when conducting the site visit. Attach copies of updated eligibility documents if applicable (bylaws, personnel policies, needs assessment, strategic plan, fiscal/travel policies)
- ❑ Grantee Update with Executive Director or designee – Note which staff provided information on each section (Fiscal, Governance, Administrative, Program Planning, other). Address the template of questions created by DCS Program Supervisor each quarter. Additional questions should be added to address information gleaned from documents noted above.
- ❑ Training and Technical Assistance Provided or Obtained – provide a brief description of how the need for T&TA was determined, a description of the T&TA provided or obtained, and the outcomes expected as a result of T&TA.
- ❑ Programs Monitored – a description of the service(s) provided and outcomes achieved by the program. It should include specific information on sources of funding, staffing, locations and times program/service is offered and other information that provides clarity to the reader. Progress or challenges should be explained.
- ❑ Analyst's Summary of Review and Observations – cite instance(s) of compliance and noncompliance, and areas that may require improvement; reference specific documents that support the observation or finding.
- ❑ Recommendations and/or Follow-up Activities, including the Timeframe and Expected Results – should contain recommendations for corrective actions as well as support offered to facilitate compliance; recommendations should be appropriate, feasible, reasonable, and include a time frame for implementation.
- ❑ Date and Purpose/Expected Results of Next Visit – describe briefly. The visit should correspond to the IMP.

CSBG Grantee Services Contact Report

New York State Department of State
Division of Community Services

Grantee: _____

Contract #: _____ **FFY:** _____ **Contract Type:** _____

Date of Contact: _____ **Time:** _____ **to** _____

Type:
- ☐ Main Office On-Site
- ☐ Satellite Office On-Site
- ☐ Telephone
- ☐ E-Mail/Fax
- ☐ Regional Meeting
- ☐ Desk Review (files/documents)
- ☐ Other _____

Grantee Personnel or Board Members Contacted (include Names and Titles):

Purpose of Contact: (check all that apply)

Purpose of Contact: (check all that apply)

- ☐ On-site visit Quarter 1
- ☐ On-site visit Quarter 2
- ☐ On-site visit Quarter 3
- ☐ On-site visit Quarter 4
- ☐ Attend Board Meeting
- ☐ Joint Site Visit with DOS Fiscal Rep
- ☐ Provide Technical Assistance
- ☐ Follow up on CORE or TRACS QIP
- ☐ Review Eligibility Documents
- ☐ Review Refunding Documents
- ☐ Conduct Board File Review
- ☐ Other _____

Documents Attached: (check all that apply)

- ☐ Amendment Documents
- ☐ Board List Certification Form
- ☐ Board List
- ☐ Board Meeting Agenda
- ☐ Board Meeting Observations Form
- ☐ Board Minutes
- ☐ Board Member Tracking Sheet
- ☐ Board Financial Reports
- ☐ Board Bylaws
- ☐ MWBE Forms
- ☐ Fiscal & Program Attestation Form
- ☐ Program Progress Report (PPR)
- ☐ Refunding Documents
- ☐ Strategic Plan (Outcome Report)
- ☐ Needs Assessment
- ☐ CORE QIP
- ☐ Personnel Policies
- ☐ Fiscal Policies
- ☐ Email Communications
- ☐ Fiscal Communications
- ☐ TDS/PARS
- ☐ Staffing/Turnover Reports
- ☐ Misc. Program Reports
- ☐ Cost Allocation Plan/ICR

Certification

By my signature below, I certify that I have reviewed this document and find it to be complete and in final form.

1) _____ _____
Program Analyst Date

2) _____ _____
Supervisor Date

3) _____ _____
Program Director or Bureau Manager Date

Submitted electronically for review and approval

GSCR (generic)

Grantee: _____

Contract #: _____ **FFY:** _____ **Contract Type:** _____

DOCUMENTS REVIEWED PRIOR TO OR DURING THE ON-SITE VISIT
Governance factual findings based on documents reviewed (note if discussion is conducted for follow up)
☐ Board Meeting Minutes Summary (Identify the dates of the meetings held since the last site visit and describe the major topics of discussion at each meeting): ☐ Board Tracking Form Summary of Findings: (Attach an updated board tracking form. Identify findings as a result of documents reviewed and identify documents needed for board member compliance). (NEW FISCAL YEAR – START A NEW FORM USING UPDATED BOARD LIST SUBMITTED WITH REFUNDING PACKAGE) ☐ Other:

Administrative and other factual findings based on documents reviewed (note if discussion is conducted for follow up)
☐ Other: If changes to the bylaws, incorporation papers, or other key organizational documents attach current versions.

Program/Planning factual findings based on documents reviewed (note if discussion is conducted for follow up)
☐ PPR Review (Attach copy of the marked up PPR used in review with Grantee – note anomalies not included within the narrative, that may present issues in subsequent quarters or APR reporting): ☐ Other:

Data Collection/Income Eligibility factual findings based on documents reviewed (note if discussion is conducted for follow up)
☐ Data collection system/process description (Describe the customer data reviewed - including process/system updates - to verify accuracy of the data collected and reported in the PPR/APR and update quarterly if needed): ☐ Describe the process/documentation used for ensuring customers assisted with CSBG funds are checked for income eligibility and update if changed: ☐ Other:

Quarterly Attestation factual findings based on documents reviewed (note if discussion is conducted for follow up)
☐ Follow up on issues noted with the form as submitted by the Grantee: ☐ Attestation form was completed by the grantee and is attached for review by the DOS Fiscal Representative ☐ Informed grantee that information provided on the Attestation Form will be verified by the DOS Fiscal Rep. ☐ Immediate action by the DOS Fiscal Rep is required based on the responses provided on the Attestation form. ☐ Reviewed random sampling of: ☐ PARS/TDS ☐ Positions funded by CSBG are consistent with approved B-2 Results of the above review conducted: ☐ Other:

CSBG Grantee Services Contact Report

New York State Department of State
Division of Community Services

Grantee: _____

Contract #: _____ **FFY:** _____ **Contract Type:** _____

ON-SITE DISCUSSION, T&TA, PROGRAM MONITORING AND FINDINGS/RECOMMENDATIONS	
Discussion and updates with Executive Director or Designee (Also note updates not addressed in Fiscal & Program Attestation):	
Fiscal based on discussion with:	
Governance based on discussion with:	
Administrative (HR, IT, Facilities) based on discussion with:	
Program & Planning based on discussion with:	
Other based on discussion with:	

Training or Technical Assistance Provided or Offered (Describe):

Program Monitoring (Analyst's review of a program each quarter)**:**

Comments and key findings (brief summary of all the areas covered by the visit)**:**

Recommendations and/or follow-up activities (including the time frame and expected results)**:**

Anticipated date of next site visit:

Grantee: _____

Contract #: _____ **FFY:** _____ **Contract Type:** _____

Documentation-Board Certification and Compliance with Grantee

CERTIFICATION OF BOARD LIST AND BOARD FILE REVIEW

Bylaws used for this review were dated: _____

The board list used for review is dated: _____

Membership Information as stated in the Grantee Bylaws:

Size of board: _____

Number by sector: Public _____
Low Income _____
Private _____

Terms: _____

Term Limit/years of service (if any): _____

Number of **vacancies** by sector:
Public _____
Low Income _____
Private _____

Number of members that have exceeded the maximum number of years of service (as indicated by appointment documentation) : _____

Bylaws contain a procedure under which low income individuals or organizations can petition for adequate representation (yes/no)

Board Member File Review:

Findings/Observations (See attached Board Tracking Sheet):

Attached: Board list certified as part of review, current Bylaws, and any additional democratic selection procedure/policy for the selection of low income sector representative board members.

Upon review of member files, bylaws, and procedures for democratic selection of low income sector representatives it is determined that the selection procedures are in accordance with the requirements of the federal CSBG Act. **(yes / no)**

Meeting Information as stated in the Grantee Bylaws:		**Meeting Information based on actual:**	
Number/frequency of meetings to be held:	_____	Number/frequency of meetings that were held:	_____
Month when annual meeting is held:	_____	Month annual meeting was held:	_____
Number needed for quorum:	_____	Number of meetings that had quorum:	_____

Board Meeting Minutes Reviewed

A review of the meeting minutes for a one year period was conducted for the period of _____ (dd/mm/yy) through _____ (dd/mm/yy).

Check the Topics Reported in the Minutes:

- ☐ Program Planning & Evaluation
- ☐ Board Self-Assessment
- ☐ Orientation or Training for Board Members
- ☐ Training (ROMA or Other)
- ☐ Strategic Planning
- ☐ Succession/Business Contingency Planning
- ☐ Evaluation of Executive Director
- ☐ Petition for Representation

Grantee: _____

Contract #: _____ **FFY:** _____ **Contract Type:** _____

☐ Policy changes (describe):

☐ Financial status (describe):

☐ Issues impacting the organization's service delivery and/or programming (describe):

A review of meeting attendance recorded in the minutes indicates that _____ members missed the required number of meetings and are in jeopardy of removal based on the bylaws.

Level of discussion and board member engagement at board meetings as reflected in the minutes reviewed

Comments and Findings (include an assessment on the completeness of the minutes and member attendance)

CERTIFICATION

The board list dated: _____ **Substantiates the board files reviewed:** ☐ **Yes** ☐ **No**

The meeting records for the one year period _____ **to** _____ **demonstrate that the board met the required number of times with quorum present for** _____ **of these meetings.** ☐ **Yes** ☐ **No**

Follow up required or documentation needed before certification can be issued by the assigned program analyst

Program Analyst Printed Name	**Signature**	**Date**

Grantee: _____

Contract #: _____ **FFY:** _____ **Contract Type:** _____

Documentation-Board Meeting

BOARD MEETING OBSERVATIONS

Meeting Called to Order: _____ (time) **Meeting Adjourned:** _____ (time)

Meeting Chaired By: _____ (name/title)

Total Number of Seated Board Members: _____ **Total Number Needed for Quorum:** _____
Total Number Present: _____ **Quorum was met (yes or no):** _____

1. Was meeting notice, agenda, and minutes distributed prior to the meeting? ☐ Yes ☐ No
   How far in advance? _____

2. Was attendance taken? ☐ Yes ☐ No

   Title of person responsible for keeping attendance records: _____

3. Were the minutes of the previous meeting reviewed and approved? ☐ Yes ☐ No

   Were corrections needed to previous minutes? ☐ Yes ☐ No

4. Executive Director Report
   Presentation of Report: ☐ Written ☐ Oral ☐ Report Attached

5. Financial Report
   Presentation of Report: ☐ Written ☐ Oral ☐ Report(s) Attached

   Who presented report: _____
   Was a financial report prepared and distributed? ☐ Yes ☐ No
   Information provided to the board: ☐ Line of Credit ☐ Revenue & Expenditures ☐ Agency-wide budget

6. Committee Reports – List of reports presented: ☐ Report(s) attached

7. Program Reports – List of reports presented: ☐ Report(s) attached

8. Summary of Discussions and/or Actions Taken: (e.g. highlight of reports presented, discussion of CSBG related issues, board member appointments, election of officers, special presentation, operational changes, changes or loss in funding, etc.)

9. Staff present/Others present:

10. Comments (Program Analyst's impression of level of discussion, meeting documents, meeting procedures followed, etc.)

11. Recommendation(s):

Board Member Tracking Sheet

Board Member Tracking Sheet

Instructions: As part of the board file review, identify each member and sector on the board of directors. Identify each source of documentation provided for the appointment. Verify whether the documentation was sufficient per DOS guidelines for each listed board member. As a follow-up/update each quarter, check the members still on the board and strike out the members no longer on the board but **DO NOT DELETE** (extra lines may be added to the document by the analyst, as needed, during the year). As new members are seated, ensure there is proper documentation on file. A new form should be started and used for each new Federal Fiscal Year.

Size of Board (per Bylaws): _____ **# Seated Members:** _____ **# of Vacant Seats** _____

Public Sector Members

#	NAME	Date of Appt	Date Term	Documents				Verified	Comments (If unable to verify, please explain)
				Appt Meeting	Bio/App Rep	In Office	Conflict of		
1									
2									
3									
4									
5									
6									

Private Sector Members

#	NAME	Date of Appt	Date Term	Documents				Verifie	Comments (If unable to verify, please explain)
				Appt Meeting	Bio/App	Category	Conflict of		
1									
2									
3									
4									
5									
6									

Low-Income Sector Members

#	NAME	Date of Appt	Date Term	Documents				Verified	Comments (If unable to verify, please explain)
				Appt Meeting	Bio/App	Democratic	Conflict of		
1									
2									
3									
4									
5									
6									

Analyst findings – Verified # of members: Public____ Private____ Low-income____

Findings, recommendations and follow-up are included on the GSCR form.

Department of State
CSBG Fiscal Monitoring Frequency Assessment Worksheet

Grantee Name:
Assessment Date:
Assessment Prepared By:

General Instructions:

1) If the risk rating is anything other than "Low", a narrative explanation is required in the comments section. For some sections, information is required in the comment section for all risk ratings. If this is the case, it is stated in the instructions for that indicator.

2) Place an X in the box next to the applicable Guidance and the corresponding rating will automatically fill. This rating will automatically carry to the assessment form.

	Indicator	Documents to Review	Instructions/Required Comments		Guidance		Rating
Agency Management							
	Previous CORE Outcome	- QIP - Most recent CORE review - Other	Include the number of recommendations addressed, progressing and not addressed. Provide detail for compliance issues not addressed	-	No Recommendations	-	Low
				-	Recommendations fully addressed	-	Low-Medium
				-	Recommendations in progress	-	Medium
				-	Recommendations not addressed	-	Medium - High
				-	Compliance Recommendations not addressed	-	High
				-	Other		
	NOD	- NOD	If a Notice of Deficiency has been issued review	-	No NOD issued	-	Low
				-	NOD issued within past 12 months, fully rectified	-	Low-Medium
				-	NOD issued within past 12 months, corrective action in progress	-	Medium
				-	NOD issued within past 12 months, corrective action not started	-	Medium - High
				-	NOD issued within the past 12 months, grantee has no ability to address	-	High
				-	Other		
	Other Funding Source Reviews	- Fiscal & Program Attestation form - Other	Review the most recent audit findings and the last quarterly Fiscal & Program Attestation form.	-	All clean - no findings or disallowed costs	-	Low
				-	Minor findings or disallowed costs	-	Low-Medium
				-	Major findings or disallowed costs	-	Medium
				-	Notice of deficiency issued by another funder	-	Medium - High
				-	Funding terminated by another funder	-	High
				-	Other		

Accounting Office Functions:							
	Bank statement reconciliation	- Bank statements with reconciliation - Fiscal & Program Attestation	Review the bank statements and corresponding reconciliations for all accounts in which CSBG funds are held.	-	Within 5 days of receipt, fully reconciled	-	Low
				-	Within 30 days of receipt, fully reconciled	-	Low-Medium
				-	More than 30 days after receipt or not fully reconciled	-	Medium
				-	More than 1 month not reconciled	-	Medium - High
				-	More than 3 months not reconciled	-	High
				-	Other		
	Valid time distribution system	- Sample of PAR's - Other	Review a sample of PAR's for CSBG employees for two consecutive pay periods	-	PAR's in accordance with A-122 for all CSBG staff not in indirect cost pool	-	Low
				-	PAR's for more than 66% of CSBG staff not in indirect cost pool	-	Low-Medium
				-	PAR's for 33% to 66% of CSBG staff not in indirect cost pool	-	Medium
				-	PAR's for less than 33% of CSBG staff not in indirect cost pool	-	Medium - High
				-	No PAR's	-	High
				-	Other		
Financial Stability Indicators:							
	Current Ratio	- Current Ratio - Balance Sheet - Other	Include the ratio and date in the comments. The most recent, reliable ratio should be used. If the ratio is below 1, perform a 3 year trend analysis	-	>1	-	Low
				-	1	-	Low-Medium
				-	.99-.90	-	Medium
				-	.89-.80	-	Medium - High
				-	<.80	-	High
				-	Other		
	Line of Credit Usage	- Line of credit activity from bank statements - Other	review the line of credit activity from a financial institution document (statement, internet printout,…) Do not use information the grantee generates	-	Do not use	-	Low
				-	Use for short term, paid within 30 days	-	Low-Medium
				-	Long term usage, covering operating costs	-	Medium
				-	Outstanding over 1 year, repayment plan identified	-	Medium - High
				-	Outstanding over 1 year, no ability to repay	-	High
				-	Other		
	Aged Accounts Payable	- Current A/P schedule - Other	Include the aging schedule in the comments. If the grantee does not age, it must be done by the FFR and reported here, as such.	-	All current	-	Low
				-	75% - 99% current	-	Low-Medium
				-	50% - 74% current or between 25% and 50% over 60 days	-	Medium
				-	less than 50% current or more than 50% over 60 days	-	Medium - High
				-	more than 50% over 90 days	-	High
				-	Other		

Independent Audit:							
	Findings and questioned costs	- Annual Audit - Other	Include the fiscal year end in the comments. If there are findings, questioned costs, material weaknesses or significant deficiencies, indicate the number of each. If any of the above are in two consecutive audits, note it here. Note if there is an qualified or modified opinion	-	No findings or questioned costs	-	Low
				-	Findings, no questioned costs	-	Low-Medium
				-	Questioned costs	-	Medium
				-	Qualified/Modified opinion w/no CSBG impact	-	Medium - High
				-	Qualified/Modified opinion with CSBG impact	-	High
				-	Other		
	Audit submission	- Annual Audit - Other	Include the due date and submission date in the comments. If it was late, review two previous audits for a trend.	-	Submitted in 6 months	-	Low
				-	Submitted by due date	-	Low-Medium
				-	Submitted within 5 days of due date	-	Medium
				-	Submitted more than 5 days late	-	Medium - High
				-	Not submitted	-	High
				-	Other		
Fiscal Representatives Determination							
	Fiscal Rep concerns	- Personal knowledge by assigned fiscal field rep - Other	This should be based on the assigned FFR's personal experiences with the grantee	-	No items of concern noted	-	Low
				-	Items of concern noted within last 12 months, fully addressed	-	Low-Medium
				-	Items of concern noted within last 12 months, corrective action in progress	-	Medium
				-	Items of concern noted within last 12 months, no corrective action implemented	-	Medium - High
				-	Items of concern noted within last 12 months, grantee unable to address	-	High
				-	Other		

The information and analysis herein is for the purpose of providing non-binding advice to the Department of State Bureau of Fiscal Management. The Department of State Bureau of Fiscal Management reserves the right to increase or decrease the number of fiscal site visits conducted during the course of any year, in its discretion, in response to circumstances presented and based upon the availability of administrative resources. This document is intended solely for intra-agency deliberative purposes, and should not be used for any other purpose.

Department of State
CSBG Fiscal Monitoring Frequency Assessment

Grantee Name:	
Assessment Date:	
Assessment Prepared By:	

Indicator	Comments		Rating	Value	Score
Agency Management:					
Previous CORE Outcome		-	Low	0	#N/A
		-	Low-Medium	1	
		-	Medium	2	
		-	Medium - High	3	
		-	High	4	
NOD		-	Low	0	#N/A
		-	Low-Medium	1	
		-	Medium	2	
		-	Medium - High	3	
		-	High	4	
Other Funding Source Reviews		-	Low	0	#N/A
		-	Low-Medium	1	
		-	Medium	2	
		-	Medium - High	3	
		-	High	4	
Accounting Office Functions:					
Bank statement reconciliation		-	Low	0	#N/A
		-	Low-Medium	1	
		-	Medium	2	
		-	Medium - High	3	
		-	High	4	
Valid time distribution system		-	Low	0	#N/A
		-	Low-Medium	1	
		-	Medium	2	
		-	Medium - High	3	
		-	High	4	
Financial Stability Indicators:					
Current Ratio		-	Low	0	#N/A
		-	Low-Medium	1	
		-	Medium	2	
		-	Medium - High	3	
		-	High	4	

Line of Credit Usage		-	Low	0	#N/A
		-	Low-Medium	1	
		-	Medium	2	
		-	Medium - High	3	
		-	High	4	
Aged Accounts Payable		-	Low	0	#N/A
		-	Low-Medium	1	
		-	Medium	2	
		-	Medium - High	3	
		-	High	4	
Independent Audit:					
Findings and questioned costs		-	Low	0	#N/A
		-	Low-Medium	1	
		-	Medium	2	
		-	Medium - High	3	
		-	High	4	
Audit submission		-	Low	0	#N/A
		-	Low-Medium	1	
		-	Medium	2	
		-	Medium - High	3	
		-	High	4	
Fiscal Representatives Determination					
Fiscal Rep concerns		-	Low	0	#N/A
		-	Low-Medium	1	
		-	Medium	2	
		-	Medium - High	3	
		-	High	4	
					#N/A

Recommended minimum number of fiscal visits per year: #N/A

	# of Visits
Total score is 0-5	2
Total score is 6-15	3
Total score is over 15	4

The information and analysis herein is for the purpose of providing non-binding advice to the Department of State Bureau of Fiscal Management. The Department of State Bureau of Fiscal Management reserves the right to increase or decrease the number of fiscal site visits conducted during the course of any year, in its discretion, in response to circumstances presented and based upon the availability of administrative resources. This document is intended solely for intra-agency deliberative purposes, and should not be used for any other purpose.

Individual Monitoring Plans-Fiscal

Fiscal IMP

Individual Monitoring Plan by the Fiscal Field Representative

Timeframe	Scope of Monitoring and Intended Outcomes

After receipt of 20%, 45% or 70% Periodic Financial Report	**Fiscal Field Representative will conduct desk review for each periodic financial report to determine compliance with contractual requirements:**
	• Review the periodic financial report for accuracy, completeness, and compliance with the executed contract.
	• Complete the "Financial Report Review" Sheet.
	
	Fiscal Field Representative may conduct a site visit based on receipt of any or all of the reports and will focus on compliance with contractual and statutory requirements, and review of reported expenditures and supporting records. Specific information to be reviewed is determined at the time of the visit. Site visits may include the following activities:
	• Agency Update: Meet with the agency's finance director to learn about changes, challenges, and improvements in fiscal functions.
	• Expenditure Review: Trace expenditures per grantees records to expenditures reported on Periodic Financial Report and follow-up on discrepancies to verify that the accounting system satisfies the 2 CFR Part 200.302 requirements (Standards for Financial and Program Management, Financial Management) and that expenditures were properly reported based on the accounting records of the agency.
	• Personal Service Review:
	  o Test a sampling of activity reports for staff to verify that the records satisfy the 2 CFR Part 200.430 Requirements for "Standards for Documentation of Personnel Expenses."
	  o Review payroll payments and corresponding tax liability payments to verify that employees and corresponding tax liabilities are being paid in full pursuant to New York State and IRS requirements.
	• Review bank account statements and corresponding reconciliation(s) for all accounts holding CSBG funds to verify that the bank accounts are fully reconciled in a timely manner to satisfy the 2 CFR Part 200.302(b) (4) requirements (Effective Control and Accountability of Funds).
	• Conduct internal control reviews or expenditure samplings to verify compliance with various contractual and statutory requirements. Reviews can include, but are not limited to, any of the following: Fiscal Policy and Procedures manuals, Revenue and Expenditure Reports, General Ledger transaction detail, balance sheet, payroll register and time distribution reports, time sheets, indirect cost agreement, indirect cost pool, paid invoices, cancelled checks, disbursement documentation, third party verifications, local share documentation, line of credit activity, purchase orders, employee expense (travel) reports, procurement documentation, insurance policies, state and federal filings, finance committee minutes, board packets and any additional items deemed necessary by the fiscal field representative or requested by the program analyst.
	• Follow-up on CORE or TRACS Quality Improvement Plan to document progress/challenges in addressing recommendations (if applicable).
	• Provide technical assistance as requested/required. Document assistance provided and outcome for the grantee (if applicable).Joint visit(s) with the assigned program analyst can be combined with any of the above reviews. Target dates for joint visits will be from January through June; scheduling to be based on mutually acceptable timeframes. Joint site visit scheduling does not take priority over at-risk agency monitoring.

Timeframe	Scope of Monitoring and Intended Outcomes
Upon receipt of the UFS/FFR	**Fiscal Field Representative will conduct desk review to determine compliance with contractual requirements:** • Review Unaudited Financial Statement (UFS) for accuracy and completeness and determine carryover/refund amount, if any is warranted. • Complete the "Review of UFS" sheet and the "Unaudited Financial Statement Review Letter" **Fiscal Field Representative will conduct on-site review (after desk review), as follows:** • Trace amounts reported on UFS to expenditures per grantee reports to verify that the accounting system satisfies the 2 CFR Part 200.302requirements for "Financial Management" and that expenditures were properly reported based on the accounting records of the agency. • Review expenditure detail reports to spot check expenditure dates and verify they are within the annual contract period. • Review paid invoices for Accounts Payable listed in Exhibit 3 to verify all obligations have been properly liquidated pursuant to 2 CFR Part 200.343 (b)(Closeout Procedures). • Review procurement records for any asset listed on Exhibit 4 to ensure compliance with 2 CFR Part 200 (Procurement Standards).

Timeframe	Scope of Monitoring and Intended Outcomes
Upon Receipt of Independent Audit (A-133)	**Fiscal Field Representative will conduct desk review within six months of receipt of A-133 audit:** • Review the Independent Audit in conjunction with the corresponding management letter. Prepare the audit closeout letter and select the appropriate course of action. • Verify the correct Catalog of Federal Domestic Assistance (CFDA) and contract numbers are shown in the Schedule of Expenditures of Federal Awards (SEFA). • Reconcile expenditures reported on the SEFA to expenditures reported to DOS for the period. If necessary, follow-up with the grantee for assistance with the reconciliation pursuant to OMB Circular A-133 Subpart C (Auditee Responsibilities). Prepare the contract/grant closeout letter and review sheet for each applicable contract/grant • Follow-up with the grantee on any deficiencies, weaknesses or questioned costs within 6 months of receipt of audit. Continue follow-up throughout the contract period regarding audit findings.

Instruction for Completing the Grantee Services Contact Report – Fiscal (GSCR-F)

Page 1 of the GSCR-F is used for general and identifying information, such as grantee name, date of contact, contract type, federal fiscal year, contract number, duration of visit, and personnel or board members contacted. This page provides a variety of check boxes to identify the purposes of the visit (Check all that apply). The first informational box should be completed to indicate if there were any findings noted during the visit, and if so, if they noted Non-Compliance.
Page 2 of the GSCR-F is used to report all documents reviewed by area of functionality. The name of the document and applicable filing date and filing period should be noted. The code will indicate which contract the document pertains to. This code will correspond to the codes on page 1.
Page 3 of the GSCR-F is used to identify and comment on any findings noted. The appropriate check boxes should be selected and "N/R" should be inserted in areas not reviewed during the visit. A brief statement should be made to describe the finding noted. If a Non-Compliance finding has been noted, a citation of the regulation should be included in the box. A more detailed explanation of the finding(s) should be provided in the Summary of Review, Findings and Observations. The Summary of Communications with Grantee Personnel should be used to include information of importance obtained during conversation. The name and title of the grantee personnel should be included.
Page 4 of the GSCR-F begins the summary of review, findings and observations. Detailed information regarding the review conducted should be included in this section. More detail regarding findings noted should be included. Recommendations should be made to address any findings noted. If specific follow-up activities are known, they should be listed here. Any training or technical assistance provided or obtained should be described here. The anticipated timeframe and purpose and expected results of the next visit should be listed. A list of documents collected should be included.

The GSCR-F is completed by the fiscal field representative in a timely manner. The report and any attachments are submitted to the supervisor for review and sign off via e-mail. The supervisor reviews the GSCR-F and attachments carefully for content and accuracy. If there are no findings noted or findings that do not indicate Non-Compliance, the supervisor requests revisions or signs off to indicate approval and returns to fiscal field representative via email. If a Non-Compliance finding has been noted, the GSCR-F must be forwarded to the CAU Supervisor for review and sign off. Once appropriate approvals have been received, the fiscal field representative converts the documents to PDF and emails to the following:

Grantee Finance Director
Grantee Executive Director
Grantee Board Chair
Assigned DCS Program Analyst
DCS Administrative Staff
DCS Supervisor
DCS Bureau Manager
Legal (Non- Compliance Finding)

CSBG Grantee Services Contact Report – Fiscal (GSCR-F)

New York State Department of State
Bureau of Fiscal Management

Grantee: _____

FFR: _____
Date of Contact: _____ **Time:** _____ **to** _____

☐ Finding(s) noted
☐ No Finding(s) Noted
☐ Non-Compliance Finding(s) Noted (copy Legal)

Site Visit Location:
☐ Main Office Address:
☐ Satellite Office Address:
☐ Other _____

Grantee Personnel or Board Members Present (include Names and Titles):

	Contract Type	Contract Number	Code
	2014 CSBG Entitlement		14 CE
	2013 CSBG Entitlement		13 CE
	2012 CSBG Entitlement		12 CE
	2014 CSBG WDG		14 CW
	2013 CSBG WDG		13 CW
	2014 ONA		14 O
	2013 ONA		13 O
	2014 ONA Legal		14 OL
	2013 ONA Legal		13 OL

Purpose of Contact: (check all that apply)

☐ Routine Fiscal Visit
☐ CORE Follow-up
☐ DOS Notice of Deficiency (NOD) Follow-up
☐ Fiscal Follow-up/Findings Review Previous Visit
☐ Fiscal Technical Assistance
☐ Unaudited Financial Review
☐ Audit Reconciliation
☐ Last Fiscal Report Submitted:
Funding Level: %

☐ Other _____

Comments:

DOCUMENTS REVIEW

DOS Filing Review	Filing	Filing Date	Filing Period	Code

Revenue and Expenditure Reports	Report Name	Report Date	Report Period	Code

Payroll Reports	Report Name	Report Date	Report Period	Code

Expenditure/Transaction Reports	Report Name	Report Date	Report Period	Code

Internal Control Reviews	Document Name	Date	Period	Code

Bank Statement Reviews	Institution Name, Last 4 of account #	Date	Period Covered	Code

Other Documents	Description	Date	Period Covered	Code

FINDINGS: (**Note:** ***Insert N/R (Not Reviewed) for any categories not reviewed at this site visit***)	
☐ No Findings	
☐ Disallowance/Questioned Cost Transaction: Comments:	☐ Non-Compliance Finding
☐ Financial Reporting Finding: Comments:	☐ Non-Compliance Finding
☐ Disallowance/Questioned Cost Transaction: Comments:	☐ Non-Compliance Finding
☐ Program/Budget Compliance: Comments:	☐ Non-Compliance Finding
☐ Program Income Finding: Comments:	☐ Non-Compliance Finding
☐ Contract Compliance Finding: Comments:	☐ Non-Compliance Finding
☐ Local Share Finding: Comments:	☐ Non-Compliance Finding
☐ Bid Procedure Finding: Comments:	☐ Non-Compliance Finding
☐ Internal Control Weakness: Comments:	☐ Non-Compliance Finding
☐ Record Keeping Weakness: Comments:	☐ Non-Compliance Finding
☐ (Un) Audit Reconciliation: Comments:	☐ Non-Compliance Finding
☐ Other: Comments:	☐ Non-Compliance Finding

Summary of Communication with Grantee Personnel (include name and title):

Summary of Review, Findings and Observations:

Recommendations and/or Follow-up Activities, including the Timeframe and Expected Results:

Training or Technical Assistance Provided or Obtained (Describe):

Anticipated Timeframe and Purpose/Expected Results of Next Visit:

List of Documents Collected:

CERTIFICATION

By my signature below, I certify that I have reviewed this document and find it to be complete and in final form.
(as per items checked above)

1) _____ _____ **2)** _____ _____
Fiscal Field Representative (FFR) Date **Supervisor** Date

3) _____ _____
CAU Supervisor (non-compliance issues **)** Date

☒ ***Submitted electronically for review and approval***

CC: Grantee Finance Director
Grantee Executive Director
Grantee Board Chair
CAU Contract File
Program Contract File
DCS Supervisor
DCS Bureau Manager
☐ Legal – Non-Compliance Finding

Grantee Services Contact Report - Fiscal – Site Visit Attendance Record (GSCR-FA)

Instructions for completing the CSBG Grantee Services Contact Report – Fiscal – Site Visit Attendance Record (GSCR-FA):

The GSCR-FA must be completed during each visit. The grantee name, date of contact, time of contact and site of contact should be completed. Any grantee personnel or board member which contribute relevant information to the GSCR-F should be asked to sign the attendance sheet. The Fiscal Field Representative will sign in certification of the form. The GSCR-FA will be appended to the final GSCR-F.

CSBG Grantee Services Contact Report – Fiscal

(GSCR-FA) Site Visit Attendance Record

New York State Department of State
Bureau of Fiscal Management

Grantee: _____

FFR: _____

Date of Contact: _____ **Time:** _____ **to** _____

Site Visit Location:

- ☐ Main Office Address:
- ☐ Satellite Office Address:
- ☐ Other _____

Grantee Personnel or Board Members Present		
Print Name	**Title**	**Signature**

CERTIFICATION

By my signature below, I certify that I have reviewed this document and find it to be accurate and in final form. This form will be appended to the final GSCR-F for this official CSBG Site Visit.

1) _____ _____

Fiscal Field Representative (FFR) Date

CSBG IM 138: Establishment of Organizational Standards for Eligible Entities

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

Transmittal No. 138 Date: January 26, 2015

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.

OCS Responsibilities

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

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

State Responsibilities

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

CSBG Eligible Entity Responsibilities

Responsibilities	Time Frame
Organizational Standards: Self-assessment and planning for adoption of standards	2015
Organizational Standards: 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/

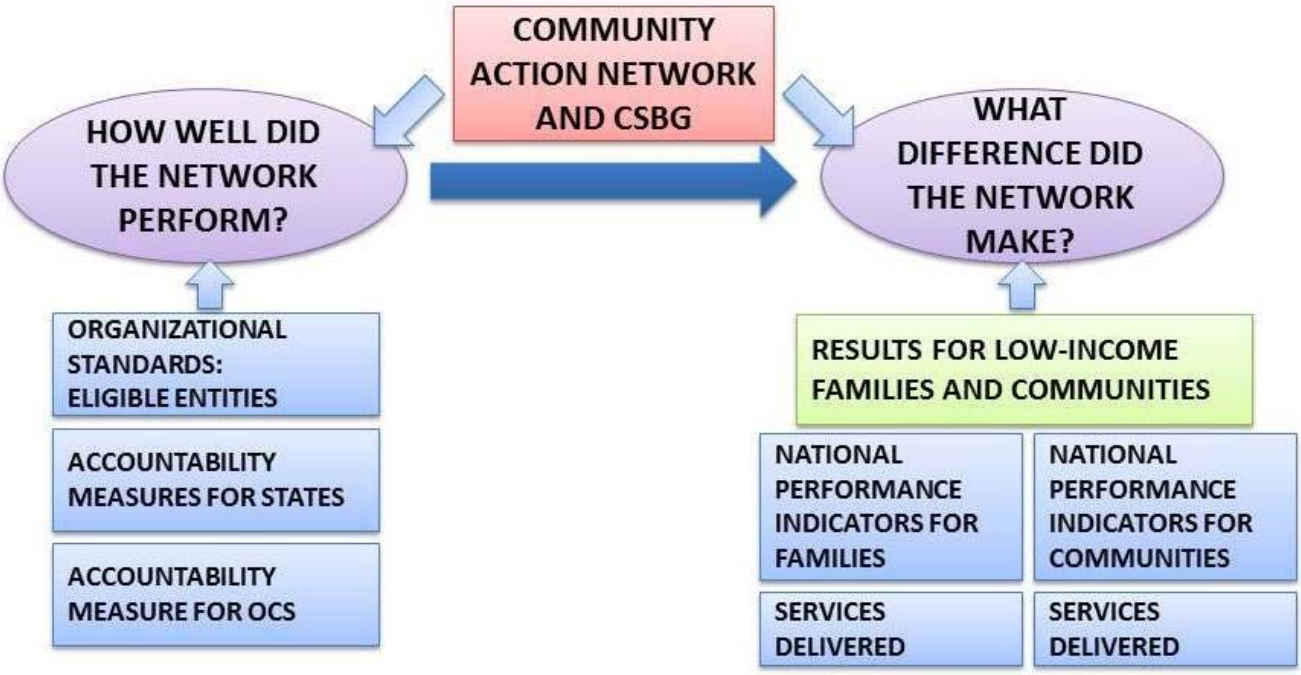
Jeannie L. Chaffin Director
Office of Community Services

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



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.

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

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

Standard 1.3 • private 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.

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

Standard 2.2 • private 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.

Standard 2.3 • private The organization communicates its activities and its results to the community.

Standard 2.4 • private 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.

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

Standard 3.2 • private 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).

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

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

Standard 3.5 • private 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.

Standard 4.1 • private The governing board has reviewed the organization's mission statement within the past 5 years and assured that:

1. The mission addresses poverty; and

2. The organization's programs and services are in alignment with the mission.

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

Standard 4.3 • private 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.

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

Standard 4.5 • private 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.

Standard 4.6 • private 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.

Standard 5.1 • private The organization's governing board is structured in compliance with the CSBG Act:

1. At least one third democratically-selected representatives of the low-income community;
2. One-third local elected officials (or their representatives); and
3. The remaining membership from major groups and interests in the community.

Standard 5.2 • private 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.

Standard 5.3 • private The organization's bylaws have been reviewed by an attorney within the past 5 years.

Standard 5.4 • private The organization documents that each governing board member

has received a copy of the bylaws within the past 2 years.

Standard 5.5 • private The organization's governing board meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its bylaws.

Standard 5.6 • private Each governing board member has signed a conflict of interest policy within the past 2 years.

Standard 5.7 • private The organization has a process to provide a structured orientation for governing board members within 6 months of being seated.

Standard 5.8 • private Governing board members have been provided with training on their duties and responsibilities within the past 2 years.

Standard 5.9 • private 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.

Standard 6.1 • private The organization has an agency-wide strategic plan in place that has been approved by the governing board within the past 5 years.

Standard 6.2 • private 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.

Standard 6.3 • private The approved strategic plan contains family, agency, and/or community goals.

Standard 6.4 • private Customer satisfaction data and customer input, collected as part of the community assessment, is included in the strategic planning process.

Standard 6.5 • private 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.

Standard 7.1 • private The organization has written personnel policies that have been reviewed by an attorney and approved by the governing board within the past 5 years.

Standard 7.2 • private The organization makes available the employee handbook (or personnel policies in cases without a handbook) to all staff and notifies staff of any changes.

Standard 7.3 • private The organization has written job descriptions for all positions, which have been updated within the past 5 years.

Standard 7.4 • private The governing board conducts a performance appraisal of the CEO/executive director within each calendar year.

Standard 7.5 • private The governing board reviews and approves CEO/executive director compensation within every calendar year.

Standard 7.6 • private The organization has a policy in place for regular written evaluation of employees by their supervisors.

Standard 7.7 • private The organization has a whistleblower policy that has been approved by the governing board.

Standard 7.8 • private All staff participate in a new employee orientation within 60 days of hire.

Standard 7.9 • private 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.

Standard 8.1 • private 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.

Standard 8.2 • private 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.

Standard 8.3 • private The organization's auditor presents the audit to the governing board.

Standard 8.4 • private The governing board formally receives and accepts the audit.

Standard 8.5 • private The organization has solicited bids for its audit within the past 5 years.

Standard 8.6 • private The IRS Form 990 is completed annually and made available to the governing board for review.

Standard 8.7 • private 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.

Standard 8.8 • private All required filings and payments related to payroll withholdings are completed on time.

Standard 8.9 • private The governing board annually approves an organization-wide budget.

Standard 8.10 • private The fiscal policies have been reviewed by staff within the past 2 years, updated as necessary, with changes approved by the governing board.

Standard 8.11 • private A written procurement policy is in place and has been reviewed by the governing board within the past 5 years.

Standard 8.12 • private The organization documents how it allocates shared costs through an indirect cost rate or through a written cost allocation plan.

Standard 8.13 • private 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.

Standard 9.1 • private The organization has a system or systems in place to track and report client demographics and services customers receive.

Standard 9.2 • private The organization has a system or systems in place to track family, agency, and/or community outcomes.

Standard 9.3 • private 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.

Standard 9.4 • private The organization submits its annual CSBG Information Survey data report and it reflects client demographics and organization-wide outcomes.

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.

Standard 1.1 • public	The department demonstrates low-income individuals' participation in its activities.
Standard 1.2 • public	The department analyzes information collected directly from low-income individuals as part of the community assessment.
Standard 1.3 • public	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.

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

Standard 2.2 • public 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.

Standard 2.3 • public The department communicates its activities and its results to the community.

Standard 2.4 • public 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.

Standard 3.1 • public The department conducted or was engaged in a community assessment and issued a report within the past 3 years, if no other report exists.

Standard 3.2 • public 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).

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

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

Standard 3.5 • public 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.

Standard 4.1 • public The tripartite board/advisory body has reviewed the department's mission statement within the past 5 years and assured that:
1. The mission addresses poverty; and
2. The CSBG programs and services are in alignment with the mission.

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

Standard 4.3 • public 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.

Standard 4.4 • public The tripartite board/advisory body receives an annual update on the success of specific strategies included in the Community Action plan.

Standard 4.5 • public The department adheres to its local government's policies and procedures around interim appointments and processes for filling a permanent vacancy.

Standard 4.6 • public 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.

Standard 5.5 • public 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.

Standard 5.6 • public Each tripartite board/advisory body member has signed a conflict of interest policy, or comparable local government document, within the past 2 years.

Standard 5.7 • public The department has a process to provide a structured orientation for tripartite board/advisory body members within 6 months of being seated.

Standard 5.8 • public Tripartite board/advisory body members have been provided with training on their duties and responsibilities within the past 2 years.

Standard 5.9 • public 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.

Standard 6.1 • public 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.

Standard 6.2 • public 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.

Standard 6.3 • public The approved strategic plan, or comparable planning document, contains family, agency, and/or community goals.

Standard 6.4 • public Customer satisfaction data and customer input, collected as part of the community assessment, is included in the strategic planning process, or comparable planning process.

Standard 6.5 • public 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.

Standard 7.1 • public 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.

Standard 7.2 • public 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.

Standard 7.3 • public The department has written job descriptions for all positions. Updates may be outside of the purview of the department.

Standard 7.4 • public The department follows local government procedures for performance appraisal of the department head.

Standard 7.5 • public The compensation of the department head is made available according to local government procedure.

Standard 7.6 • public The department follows local governmental policies for regular written evaluation of employees by their supervisors.

Standard 7.7 • public 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.

Standard 7.8 • public The department follows local governmental policies for new employee orientation.

Standard 7.9 • public 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.

Standard 8.1 • public 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.

Standard 8.2 • public The department follows local government procedures in addressing any audit findings related to CSBG funding.

Standard 8.3 • public The department's tripartite board/advisory body is notified of the availability of the local government audit.

Standard 8.4 • public The department's tripartite board/advisory body is notified of any findings related to CSBG funding.

Standard 8.5 • public 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.

Standard 8.6 • public 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.

Standard 8.7 • public 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.

Standard 8.8 • public 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.

Standard 8.9 • public The tripartite board/advisory body has input as allowed by local governmental procedure into the CSBG budget process.

Standard 8.10 • public 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.

Standard 8.11 • public 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.

Standard 8.12 • public 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.

Standard 8.13 • public 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.

Standard 9.1 • public The department has a system or systems in place to track and report client demographics and services customers receive.

Standard 9.2 • public The department has a system or systems in place to track family, agency, and/or community outcomes.

Standard 9.3 • public 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.

Standard 9.4 • public 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
Initial discussions with key partners in the State	*State convenes discussions with eligible entities, State CAA Association, and other partners to discuss process and timeline for adopting COE-developed organizational standards.*	State CSBG Lead Agency, eligible entities, State CAA Association
Assessment of State laws and rulemaking requirements	*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).*	State procurement office, State agency counsel, National Association for State Community Services Programs (NASCSP), Community Action Program Legal Services, Inc.
Development and public notification of State standards	*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.*	CSBG Organizational Standards Center of Excellence
Opportunities for input on timelines and procedures	*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.*	CSBG Regional Performance and Innovation Consortia (RPIC), State CAA Association
Development and communication of technical assistance strategies	*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.*	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

Critical Action Area	Description	Critical Partners and Available
Incorporation of standards in State CSBG Plan	*State CSBG officials incorporate organizational standards and procedures for implementation into annual State CSBG Plans. These plans are made available for public inspection consistent with requirements in the CSBG Act and are submitted for Federal review as part of the application for CSBG funds.*	NASCSP, CSBG Organizational Standards Center of Excellence, OCS State Liaison staff
Incorporation of standards in local CSBG Plans and agency procedures	*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.*	CSBG Organizational Standards of Excellence, Community Action Program Legal Services, Inc., State CAA Associations
Assessment and communication of results	*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.*	NASCSP, CSBG Organizational Standards Center of Excellence, OCS State Liaison staff
Corrective action cycle	*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.*	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 IM 116.

Triennial Review for Accountability and Compliance with Standards (TRACS) (cover page, general information and first organizational standard)

NEW YORK STATE OF OPPORTUNITY™ | Department of State

Division of Community Services

Community Services Block Grant Program

Annual Compliance Review

of

Organizational Standards

(ACROS)

Grantee Self-Assessment

Grantee Name

Due January 31st

SELF-ASSESSMENT TOOL

FOR PRIVATE ELIGIBLE ENTITIES

Background

The CSBG organizational standards provide a standard foundation of organizational capacity for all Eligible Entities across the United States. The Federal Office of Community Services' Information Memorandum (IM) 138 provides direction to States and eligible entities 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.

This tool has been updated with the final language for the organizational standards as issued in IM 138. The tool provides guidance regarding the intent of the CSBG Working Group as they developed the standards. 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.

New York State Process

As part of IM138, New York State Department of State, Division of Community Services (DOS-DCS) is responsible for assessing the status of all eligible entities annually against the organizational standards. After discussion with DOS staff, grantees, the State Association and CSBG Advisory Council, it was determined that DOS-DCS would use this assessment tool to carry out the State's responsibility under IM 138.

DOS-DCS will require each eligible entity to complete this self-assessment each Federal Fiscal Year (FFY). The self- assessment and corresponding documentation must be submitted to the assigned program analyst for review and verification by January 31st. The information will be verified by the assigned program analyst and a report will be prepared identifying the unmet standards and timetable to come into compliance. Technical assistance needs will also be incorporated into the report.

Once every 3 years, the eligible entity will have an on-site review using a similar but more comprehensive tool known as the Triennial Review for Accountability with Compliance Standards (TRACS). For the FFY that the triennial review is conducted, the TRACS assessment process will replace this annual self-assessment.

Understanding the Self-Assessment Tool

:

First, there is brief guidance on each standard. It attempts to clarify issues that have been raised without unintentionally narrowing the standard.

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

Third, what document(s) were used to assess the standard? 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 to demonstrate how the standard is met.

There is a space on the tool to note documentation that was used but was not included on the pre-populated list. You are required to provide a hard copy of each document in support of the standard.

Gathering these document(s) will assist in providing documentation for the future Triennial Review for Accountability and Compliance with Standards (TRACS) which assesses compliance with the standards as well as state requirements.

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.

Submitting the Tool and Supporting Documentation

Organizing the documents is key to ensuring an efficient and thorough review. Eligible entities are required to create a binder large enough to hold each standard with the corresponding documentation behind it or attached to it. The documentation must be sufficient to support compliance with each standard. There are 58 standards in all.

When documentation for a standard is contained in a large document, provide the specific information being requested or a specific reference to the document. For example, many standards will reference the bylaws as a source for documentation. Rather than copying the full bylaws several times, the eligible entity should provide one copy of the entire bylaws for review. For the standard that require the bylaws as a source for documentation, provide a notation to the specific page or article in the bylaws associated with the standard to facilitate the reviewer's assessment of compliance.

Binders must be submitted to the assigned program analyst by January 31st.

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.

Organization Self-Assessment:

☐Met

☐Not Met

Documentation Attached to Support the Standard

(Check all that apply)

☐Advisory group documents

☐Advisory group minutes

☐Activity participation lists

☐Board minutes

☐Board pre-meeting materials/packet

☐Volunteer lists and documents

List Other Documentation attached:

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

Action steps to be taken to meet the Standard:

Notes:

There are 58 organizational standards included in the complete document

Triennial Review for Accountability and Compliance with Standards (TRACS) (cover page, general information and first organizational standard)

NEW YORK STATE OF OPPORTUNITY™ | Department of State

Division of Community Services

Community Services Block Grant Program

Triennial Review for Accountability and Compliance with Standards (TRACS)

GRANTEE NAME:
ON SITE DATES:
DRAFT/REPORT DATE: [DATE]

General Information and Instructions

Background:

Triennial Review for Accountability and Compliance with Standards was created by the New York State, Department of State Division of Community Services in consultation with representatives from the NYS Community Action Association, CSBG Advisory Council, and several Community Action Agencies (CAA). Triennial Review for Accountability and Compliance with Standards was sent to every eligible entity in New York State (NYS) in March 2015. Grantees were encouraged to use this tool as part of an annual self-assessment process.

Purpose:

The purpose of this assessment is two-fold: First to assess for compliance with the Organizational Standards set forth by HHS, Office of Community Services (Information Memorandum 138, Dated January 26, 2015) and second to fulfill the State's requirement under the CSBG Act for a comprehensive on-site assessment of each eligible entity at least once every three years (42 USC § 9914).

Triennial Review for Accountability and Compliance with Standards is based in part on a similar tool created by the Community Action Partnership to assess compliance with the organizational standards. The tool was expanded to include indicators which will be used by reviewers to verify that the eligible entity has operationalized and complied with each standard. In most instances, additional indicators were included to expand on the organizational standard in order to review compliance with State requirements or higher level functions deemed appropriate by the State.

Process:

Sixty calendar days prior to an on-site assessment, DOS will formally send Triennial Review for Accountability and Compliance with Standards to the CEO and board chair of the eligible entity. The eligible entity is responsible for gathering sufficient documentation to support each standard and its corresponding indicators. Within each standard there are suggested documents that may assist in demonstrating compliance. Grantees may wish to and are able to provide other forms of documentation than those listed in order to demonstrate compliance. Once on site, staff from the Department of State will review the documents submitted for each standard and its associated indicators to verify whether the indicators have been met.

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 eligible entities 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 eligible entities meet this Standard by including advisory bodies to the board.

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 utilized to demonstrate the standard and indicators below are "met":

Board member selection documents for low-income reps, needs assessment, board meeting announcements, volunteer timesheets.

Indicators of compliance with Organizational Standard and additional State Requirements as part of the triennial review process.

☐ Selection/election process of low-income representatives to the board is based on input from low-income persons (Ex. Voting, petitions).
☐ Low-income community provides input in the development of the needs assessment (Ex. Survey, community forum or focus group, interviews).
☐ The low-income community/agency customers are informed of regular board meetings, which are open to the public.
☐ Low-income individuals or customers volunteer at the agency.

Findings by reviewer:

Assessment of the Indicators:

☐ Met-The eligible entity has met all of the Indicators as part of the triennial assessment.
☐ Met-The eligible entity has met some (not all) of the Indicators as part of the triennial assessment.
☐ Not Met –The eligible entity has met none of the Indicators as part of the triennial assessment.

Assessment of Organizational Standard Based on the Indicators Checked:

☐ Met-The eligible entity has met the requirements of the Standard as written.
☐ Not Met –The eligible entity met none of the requirements of the Standard as written

Recommendations or next steps needed to meet the National Standard and/or Indicators:

CSBG IM No. 116 Corrective Action, Termination, or Reduction of Funding

May 1, 2012
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 no 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/

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

documented as expended upon termination of the FFY 2015 budget period, the balance due to the Contractor will be carried forward subject, however, to the provisions of section 675C(a)(3) of the federal CSBG Act.

b. The Unaudited Financial Statements and Audit will be the final project budget documents from which preliminary and final determinations of allowable costs will be made.

1.02 Payment Office

a. Vouchers, Audits, unaudited financial statements, and periodic financial reports shall be submitted to the Contract Administration Unit (CAU), Department of State, 99 Washington Avenue, Albany, NY 12231. The Department shall notify the Contractor within 15 days if its voucher contains any claim for payment that is incomplete or contains a claim for any payment that is no in compliance with this Agreement, and the Contractor shall take corrective action in a timely manner.

b. Refunding Applications, Contract Amendments, Budget Amendments, and Program Progress Reports shall be submitted to the assigned program analyst or as directed by written correspondence.

1.03 Program Reports

In accordance with PL. 105-285, Section 678E, all eligible entities are required to participate in a performance measurement system in a form and manner as directed by the Department. All CSBG Contractors and Delegate Agencies in New York State will participate in the Result-Oriented Management and Accountability (ROMA) system approved by the US Department of Health and Human Services, Office of Community Services.

a. Program Progress Reports (PPR): Each Contractor shall prepare and submit four PPRs documenting progress toward achieving the milestones as stated in the approved Work Plan. The PPRs are due with the Contractor's submission of documents for the following: (1) Second payment; (2) Third payment; (3) Fourth payment; and (4) the earlier of: (a) the end of the Term of this Agreement, or (b expenditure of all the funds provided pursuant to this Agreement. Where applicable, the PPRs must include reports of Delegate Agencies. Notwithstanding the foregoing, in addition to the four PPRs required above, Contractor agrees that it shall submit supplemental and additional PPRs upon request of the Division of Community Services during the Term of this Agreement. Such supplemental or additional PPRs shall be submitted in a timely fashion and in the form and manner as required by the Division of Community Services.

b. Annual Report: Each Contractor shall annually prepare and submit to the Department a comprehensive report. The report must include the following:

- comparison of planned uses of CSBG funds and the actual uses of the funds
- accounting of the use of CSBG funds for administrative costs
- accounting of CSBG funds used for direct delivery of services to low-income persons
- the numbers, characteristics and demographics of all persons served
- a summary of the outcomes and results achieved in accordance with the purposes, goals and assurances of CSBG and ROMA
- National Performance Indicators
- listing of all resources leveraged

The Annual Report shall be prepared on forms provided by the Department in the format requested by the Department, and must be submitted by November 1st each year.

Attachment 7: Response to Section 14.1a – Activities Targeting Seven Programmatic Purposes

i. **Self-sufficiency**: 46 eligible entities have embraced the family development model as a method to assist individuals and families to establish personal goals and timelines to address the barriers that have prevented them from becoming self- sufficient. In past years approximately $11,800,000 in CSBG funding was used for this purpose. That level of annual fund use is expected to continue in Federal Fiscal Years 2016 and 2017.

ii. **Employment**: 42 eligible entities are providing services ranging from on the job training, job skills training, job development and placement, as well as support services to ensure successful employment outcomes. These include but are not limited to providing childcare, transportation, and work supplies/equipment. Over $8,552,700 in 2014 CSBG funds was allocated for these purposes. A similar level of annual fund use is expected to continue in Federal Fiscal Years 2016 and 2017.

iii. **Education**: 39 eligible entities provide a variety of educational programs for customers of all ages. This includes Head Start, Early Head Start, Afterschool tutoring, GED, Adult Basic Literacy, ESOL, and Financial Literacy. Over $11,835,700 in 2014 CSBG funds was allocated for these purposes. That level of annual fund use is expected to continue in Federal Fiscal Years 2016 and 2017.

iv. **Use of income**: 36 eligible entities offer financial literacy skills training, volunteer income tax assistance, food buying co-ops, commodities distribution, and holiday projects, to name a few. Over $1,055,000 in 2014 CSBG funds was allocated for these purposes. That level of annual fund use is expected to continue in Federal Fiscal Years 2016 and 2017.

v. **Housing**: 40 eligible entities offer housing assistance including but not limited to shelter for targeted populations (DV, homeless, runaway teen), rehabilitation of existing units, development of new housing, rental subsidies, and weatherization. Over $4,306,800 in 2014 CSBG funds was allocated for these purposes. A similar level of annual fund use is expected to continue in Federal Fiscal Years 2016 and 2017.

vi. **Emergency assistance**: 43 eligible entities offer emergency assistance, most notably food and clothing but also assistance with medication or health care, utility payments, first month rent and security deposit, temporary shelter, and disaster recovery. Over $3,690,000 in 2014 CSBG funds was allocated for these purposes. That level of annual fund use is expected to continue in Federal Fiscal Years 2016 and 2017.

vii. **Community participation, including documenting best practices and engaging law enforcement agencies**: As part of its work funded through DOS, the NYSCAA Board of Directors has established a committee devoted to identifying best practices among its CAA membership. In addition, DOS program analysts will identify best practices during routine monitoring and during the comprehensive triennial assessment of grantees and share this information with their colleagues during staff meetings and with other grantees during site visits.

Attachment 8: Supplemental Response to Section 14.11 – CSBG Contract Work Plan Package

ATTACHMENT C

COMMUNITY SERVICES BLOCK GRANT

C-1a 2015 Needs Assessment

Contractor				**FFY**	**2015**
Budget Period	**10/1/14**	**to**	**9/30/15**	**Contract #**	

42 U.S.C. 9901 et seq., Section 676, (b), (11) states 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;"

In compliance with the above, please provide the information below:

1. Date of most recent needs assessment: _____

2. Describe the process used to conduct the assessment (include the involvement of low-income persons, the community served, agency staff, and the board of directors):

Attachment 8: (continued)

ATTACHMENT C

COMMUNITY SERVICES BLOCK GRANT

C-1b 2015 Demonstrated Community Needs and Programs and Services to Address the Needs

Contractor	**0**	**FFY**	**2015**

Budget Period	**10/1/14**	**to**	**9/30/15**	**Contract #**	**0**

Below, summarize the greatest needs of the community (and each sub-community*) served, as demonstrated by the most recent community needs assessment:

1. Name of Community Served:

Greatest Demonstrated Need(s):		Programs/Services that help address the need	
A.		A.	
B.		B.	
C.		C.	
D.		D.	
E.		E.	
F.		F.	
G.		G.	
H.		H.	
I.		I.	
J.		J.	

ADD ADDITIONAL LINES AS NEEDED IN ORDER TO INCLUDE ALL PROGRAMS OPERATED BY THE AGENCY

Attachment 8: (continued)

ATTACHMENT C

COMMUNITY SERVICES BLOCK GRANT

C-1b 2015 Demonstrated Community Needs and Programs and Services to Address the Needs (continued)

Contractor	**0**			**FFY**	**2015**
Budget Period	**10/1/14**	**to**	**9/30/15**	**Contract #**	**0**

Below, summarize the greatest needs of the sub-community* served, as demonstrated by the most recent community needs assessment:

2-a. Name of Sub-Community Served (where applicable):

Greatest Demonstrated Need(s):		Programs/Services that help address the need	
A.		A.	
B.		B.	
C.		C.	

2-b. Name of Sub-Community Served (where applicable):

Greatest Demonstrated Need(s):		Programs/Services that help address the need	
A.		A.	
B.		B.	
C.		C.	

2-c. Name of Sub-Community Served (where applicable):

Greatest Demonstrated Need(s):		Programs/Services that help address the need	
A.		A.	
B.		B.	
C.		C.	

Attachment 8: (continued)

ATTACHMENT C

COMMUNITY SERVICES BLOCK GRANT

C-1c 2015 Strategic Plan Goals and Objectives

Contractor	**0**	**FFY**	**2015**
Budget Period	**10/1/14 to 9/30/15**	**Contract #**	**0**

Time frame of the current Strategic Plan:	

Briefly list the major goal and corresponding objectives contained in the plan that drive capacity building activities.

Goal:	

Objectives:

a)

b)

c)

d)

Goal:	

Objectives:

a)

b)

c)

d)

ADD ADDITIONAL LINES AS NEEDED

Attachment 8: (continued)

ATTACHMENT C

COMMUNITY SERVICES BLOCK GRANT

C-1c 2015 Strategic Plan Goals and Objectives (continued)

Contractor	**0**	**FFY**	**2015**
Budget Period	**10/1/14 to 9/30/15**	**Contract #**	**0**

Goal:

Objectives:

a)

b)

c)

d)

Goal:

Objectives:

a)

b)

c)

d)

ADD ADDITIONAL LINES AS NEEDED

Attachment 8: (continued)

ATTACHMENT C

COMMUNITY SERVICES BLOCK GRANT

C-1c 2015 Strategic Plan Goals and Objectives (continued)

Contractor	**0**	**FFY**	**2015**
Budget Period	**10/1/14 to 9/30/15**	**Contract #**	**0**

Goal:

Objectives:

a)

b)

c)

d)

Goal:

Objectives:

a)

b)

c)

d)

ADD ADDITIONAL LINES AS NEEDED

Attachment 8: (continued)

Check one:					
Work Plan ☐	Plan Amendment ☐	**ATTACHMENT C**	Page 1	of	
PPR #1 ☐	PPR #3 ☐	COMMUNITY SERVICES BLOCK GRANT			
PPR #2 ☐	PPR #4 ☐	**C-2a 2015 Work Plan and Program Progress Report (PPR)**	**FFY**	**2015**	
			Budget Period	**10/1/14-9/30/15**	
		Contractor **0**	**Contract #**	**0**	

Agency needs identified in the needs assessment or strategic plan as summarized on C1b and C1c will form the basis for capacity building activities.

AGENCY CAPACITY BUILDING

Interventions Briefly describe the activities that will address the agency need or strategic plan objective:	**Benchmarks** List the expected outcome of the capacity building activity	**NPI(s)**	**Method(s) of Measurement/Verification** Briefly describe the tool or process to be used to verify progress on the outcome	**Annual Projected**	**ACTUAL PROGRAM PROGRESS**				
					PPR #1 Achieved	PPR #2 Achieved	PPR #3 Achieved	PPR #4 Achieved	YTD Total
									0
									0
									0
									0
									0
									0
									0

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Attachment 8: (continued)

Check one:					
Work Plan ☐	Plan Amendment ☐	**ATTACHMENT C**		Page ____	of ____
PPR #1 ☐	PPR #3 ☐	COMMUNITY SERVICES BLOCK GRANT			
PPR #2 ☐	PPR #4 ☐	**C-2b 2015 Work Plan and Program Progress Report (PPR)**		**FFY**	**2015**
				Budget Period	**10/1/14-9/30/15**
	Contractor	**0**		**Contract #**	**0**

Agency needs identified in the needs assessment or strategic plan as summarized on C1b and C1c will form the basis for community partnerships.

AGENCY PARTNERSHIPS (Agency-wide Unduplicated Count)

Interventions Briefly describe the activities that will address the agency need or strategic plan objective:	**Benchmarks** List the expected outcome of the capacity building activity	**NPI(s)**	**Method(s) of Measurement/Verification** Briefly describe the tool or process to be used to verify progress on the outcome	**Annual Projected**	**ACTUAL PROGRAM PROGRESS**				
					PPR #1 Achieved	PPR #2 Achieved	PPR #3 Achieved	PPR #4 Achieved	YTD Total
									0
									0
									0
									0
									0
									0
									0

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Attachment 8: (continued)

Check one:					
Work Plan ☐	Plan Amendment ☐	**ATTACHMENT C**		Page ____	of ____
PPR #1 ☐	PPR #3 ☐	COMMUNITY SERVICES BLOCK GRANT			
PPR #2 ☐	PPR #4 ☐	**C-2c 2015 Work Plan and Program Progress Report (PPR)**		**FFY**	**2015**
				Budget Period	**10/1/14-9/30/15**
		Contractor	**0**	**Contract #**	**0**

Description of Need (Customer, Community, Agency) Briefly identify the need that documents the reason for the programs/ services/milestones and outcomes listed below (Corresponds to the needs/strategic objectives identified in C1b or C1c):	
Program that addresses the need described above:	

Interventions Briefly describe the services, activities, and advocacy that will address the need and achieve the outcome:	**Benchmarks or Milestones and Outcomes** List the projected baseline number of customers to be enrolled (if applicable) and the expected benchmarks or milestones and outcomes to be achieved for the service or activity (Funnel). When possible, describe the outcome using language from the NPIs:	**NPI(s)**	**Method(s) of Measurement/Verification** Identify the tool or process to be used to verify progress on the outcome or milestone:	**Annual Projected**	**ACTUAL PROGRAM PROGRESS**				
					PPR #1 Achieved	PPR #2 Achieved	PPR #3 Achieved	PPR #4 Achieved	YTD Total
									0
									0
									0
									0
									0
									0

(continue on next page, if necessary)

Attachment 8: (continued)

Check one:				ATTACHMENT C	Page		of	
PPR #1	☐	PPR #3	☐	COMMUNITY SERVICES BLOCK GRANT				
PPR #2	☐	PPR #4	☐	**C-2d 2015 Program Progress Report (PPR) Narrative**				

Contractor **0** **FFY** **2015**

Budget Period **10/1/14** **to** **9/30/15** **Contract #** **0**

Program(s):		NPI(s) affected:

1. Describe progress and/or challenges during reporting period in implementing the program(s):

2. Describe corrective measures undertaken to address challenges experienced during this period. (Please indicate by whom and when.)

Program(s):		NPI(s) affected:

1. Describe progress and/or challenges during reporting period in implementing the program(s):

2. Describe corrective measures undertaken to address challenges experienced during this period. (Please indicate by whom and when.)

Program(s):		NPI(s) affected:

1. Describe progress and/or challenges during reporting period in implementing the program(s):

2. Describe corrective measures undertaken to address challenges experienced during this period. (Please indicate by whom and when.)

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Attachment 8: (continued)

ATTACHMENT C

Page 1 of

COMMUNITY SERVICES BLOCK GRANT

C-3a 2015 Summary of Work Plan and Attachments

Contractor **0** **FFY** **2015**

Budget Period **10/1/14** to **9/30/15** **Contract #** **0**

Summary of Work Plan pages and related attachments:

Work Plan Page #	Demonstrated Need	Program Priority/ Program Name(s)	Primary ROMA Goal Corresponds to C-1a and C-1b	Individual/ Family (F) Community (C) Agency (A)	FFY 2015 CSBG Funds	FFY 2014 Unexpended CSBG Funds	Local Share Cash	Local Share In-Kind	Other Cash Resources
1	Strategic Plan (refer to Attachment C-1c)	Agency Capacity Building		A	$	$	$	$	$
					$	$	$	$	$
					$	$	$	$	$
					$	$	$	$	$
					$	$	$	$	$
					$	$	$	$	$
					$	$	$	$	$
					$	$	$	$	$
					$	$	$	$	$
					$	$	$	$	$
					$	$	$	$	$
				TOTAL	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**

(continue on next page, if necessary)

Attachment 8: (continued)

ATTACHMENT C

COMMUNITY SERVICES BLOCK GRANT

C-3b 2015 CSBG Work Plan

Planned Use of CSBG Funds by Contractor

Contractor **0** **FFY** **2015**

Budget Period **10/1/14** To **9/30/15** **Contract #** **0**

1. Total CSBG FFY 2015 Allocation $ _____

2. Total CSBG Unexpended FFY 2014 Allocation $ _____

3. Total CSBG funds available during FFY 2015 $ _____

4. For each National Goal, enter the amount of CSBG funds used (excluding administrative funds):

A		B	C
National Goals		FFY 2015 CSBG Funds	Unexpended FFY 2014 CSBG Funds
Low-Income People Become More Self-Sufficient	**(Goal 1)**	$	$
The Conditions In Which Low-Income People Live Are Improved	**(Goal 2)**	$	$
Low-Income People Own A Stake In Their Community	**(Goal 3)**	$	$
Partnerships Among Supporters And Providers Of Services To Low-Income People Are Achieved	**(Goal 4)**	$	$
Agencies Increase Their Capacity To Achieve Results	**(Goal 5)**	$	$
Low-Income People, Especially Vulnerable Populations, Achieve Their Potential By Strengthening Family And Other Supportive Systems	**(Goal 6)**	$	$

	FFY 2015 CSBG Funds	Unexpended FFY 2014 CSBG Funds
5. Total funds direct charged for administration	$ _____	$ _____
6. Funds grantee approved indirect cost rate or admin. cost rate (same as Attachment B-1, Line 6)	$ _____	$ _____
7. Funds awarded to Delegate Agencies	$ _____	$ _____

If CSBG spending on administrative costs will exceed 15% of CSBG funds, please explain:

Attachment 8: (continued)

ATTACHMENT C

COMMUNITY SERVICES BLOCK GRANT

C-3c 2015 CSBG Work Plan

Summary of Planned Use of CSBG Funds by Delegate Agencies

Contractor **0** **FFY** **2015**

Budget Period **10/1/14** To **9/30/15** **Contract #** **0**

Total Number of Delegate Agencies _____

1. Total CSBG FFY 2015 Allocation to Delegate Agencies **$** _____

2. Total CSBG Unexpended FFY 2014 Allocation to Delegate Agencies **$** _____

3. For each National Goal (Column A), enter the aggregate amount of CSBG funds to be used (Column B and Column C) by Delegate Agencies (excluding administrative funds):

A		B	C
National Goals		FFY 2015 CSBG Funds	Unexpended FFY 2014 CSBG Funds
Low-Income People Become More Self-Sufficient	**(Goal 1)**	**$**	**$**
The Conditions In Which Low-Income People Live Are Improved	**(Goal 2)**	**$**	**$**
Low-Income People Own A Stake In Their Community	**(Goal 3)**	**$**	**$**
Partnerships Among Supporters And Providers Of Services To Low-Income People Are Achieved	**(Goal 4)**	**$**	**$**
Agencies Increase Their Capacity To Achieve Results	**(Goal 5)**	**$**	**$**
Low-Income People, Especially Vulnerable Populations, Achieve Their Potential By Strengthening Family And Other Supportive Systems	**(Goal 6)**	**$**	**$**

	FFY 2015 CSBG Funds	Unexpended FFY 2014 CSBG Funds
4. Total funds used for administration by Delegate Agencies	**$** _____	**$** _____
5. Average percentage of CSBG funds used for administration by Delegate Agencies	_____ **%**	_____ **%**

If CSBG spending on administrative costs will exceed 15% of CSBG funds, please explain:

Attachment 8: (continued)

ATTACHMENT C

COMMUNITY SERVICES BLOCK GRANT

C-4a 2015 Community Partnerships

Contractor	**0**				**FFY**	**2015**
Budget Period	**10/1/14**	**to**	**9/30/15**		**Contract #**	**0**

42 U.S.C. 9901 et seq., Section 676, (b), (9) states 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;"

Describe the role of other groups, associations, and organizations in the provision of services and activities:

Name and Type of Organization:

Description of Involvement:

Name and Type of Organization:

Description of Involvement:

Name and Type of Organization:

Description of Involvement:

Name and Type of Organization:

Description of Involvement:

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Attachment 8: (continued)

ATTACHMENT C

COMMUNITY SERVICES BLOCK GRANT

C-4b 2015 Community Partnerships (continued)

Contractor	**0**				**FFY**	**2015**
Budget Period	**10/1/14**	**to**	**9/30/15**		**Contract #**	**0**

42 U.S.C. 9901 et seq., Section 676, (b), (5) states 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;"

Describe linkages with workforce investment:

Describe other linkages (optional):

Attachment 9: Response to Section 15.1-15.4 – Federal Certifications

Federal Certification

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements
The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance
The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

_____ _____
Signature and Date

_____
Printed Name

_____
Title

_____
Organization

Attachment 9: (continued)

Federal Certification

CERTIFICATION REGARDING DRUG-FREE WORKPLACE REQUIREMENTS

This certification is required by the regulations implementing the Drug-Free Workplace Act of 1988: 45 CFR Part 76, Subpart, F. Sections 76.630(c) and (d)(2) and 76.645(a)(1) and (b) provide that a Federal agency may designate a central receipt point for STATE-WIDE AND STATE AGENCY-WIDE certifications, and for notification of criminal drug convictions. For the Department of Health and Human Services, the central point is: Division of Grants Management and Oversight, Office of Management and Acquisition, Department of Health and Human Services, Room 517-D, 200 Independence Avenue, SW Washington, DC 20201.

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.

2. The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.

3. For grantees other than individuals, Alternate I applies

4. For grantees who are individuals, Alternate II applies.

5. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.

6. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio studios).

7. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).

8. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

Controlled substance means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

Conviction means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

Criminal drug statute means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

Attachment 9: (continued)

Employee means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All direct charge employees; (ii) All indirect charge employees unless their impact or involvement is insignificant to the performance of the grant; and, (iii) Temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Alternate I. (Grantees Other Than Individuals)

The grantee certifies that it will or will continue to provide a drug-free workplace by:

(a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;

(b) Establishing an ongoing drug-free awareness program to inform employees about - -

(1) The dangers of drug abuse in the workplace;
(2) The grantee's policy of maintaining a drug-free workplace;
(3) Any available drug counseling, rehabilitation, and employee assistance programs; and
(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;

(c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);

(d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will –

(1) Abide by the terms of the statement; and
(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

(e) Notifying the agency in writing, within ten calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

(f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted –

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

(g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Attachment 9: (continued)

Place of Performance (Street address, city, county, state, zip code)

One Commerce Plaza, 99 Washington Avenue, Albany, New York 12231
123 William Street, New York 10038
333 East Washington Street, Syracuse, New York 13202
65 Court Street, Buffalo, New York 14202

___Check if there are workplaces on file that are not identified here.

[55 FR 21690, 21702, May 25, 1990]

_____ _____
Signature and Date

_____
Printed Name

_____
Title

_____
Organization

Attachment 9: (continued)

Federal Certification

Certification Regarding Debarment, Suspension, and Other Responsibility Matters — Primary Covered Transactions

Instructions for Certification

1. By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.
2. The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.
3. The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.
4. The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
5. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.
6. The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.
7. The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.
9. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
10. Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

Attachment 9: (continued)

Certification Regarding Debarment, Suspension, and Other Responsibility Matters — Primary Covered Transactions

(1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:

(a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;
(b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
(c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
(d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.

(2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

_____ _____
Signature and Date

_____
Printed Name

_____
Title

_____
Organization

Attachment 9: (continued)

Federal Certifications

CERTIFICATION REGARDING ENVIRONMENTAL TOBACCO SMOKE

Public Law 103227, Part C Environmental Tobacco Smoke, also known as the Pro Children Act of 1994, requires that smoking not be permitted in any portion of any indoor routinely owned or leased or contracted for by an entity and used routinely or regularly for provision of health, day care, education, or library services to children under the age of 18, if the services are funded by Federal programs either directly or through State or local governments, by Federal grant, contract, loan, or loan guarantee. The law does not apply to children's services provided in private residences, facilities funded solely by Medicare or Medicaid funds, and portions of facilities used for inpatient drug or alcohol treatment. Failure to comply with the provisions of the law may result in the imposition of a civil monetary penalty of up to $1,000 per day and/or the imposition of an administrative compliance order on the responsible entity. By signing and submitting this application, the applicant/grantee certifies that it will comply with the requirements of the Act.

The applicant/grantee further agrees that it will require the language of this certification be included in any subawards which contain provisions for the children's services and that all subgrantees shall certify accordingly.

_____ _____
Signature and Date

_____
Printed Name

_____
Title

_____
Organization