Department of Commerce
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Washington State COMMUNITY SERVICES BLOCK GRANT

COMMUNITY SERVICES BLOCK GRANT (CSBG)
Policies and Procedures

Effective Date: January 2010

DRAFT

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Effective January 1, 2007
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PREFACE

COMMUNITY SERVICES BLOCK GRANT
POLICIES

The following program policies have been developed to:

1. Provide assistance in implementing the Community Services Block Grant Program;

2. Comply with the authorizing legislation of the Omnibus Reconciliation Act of 1982 (Public Law 97-35), Title VI, Subtitle B (CSBG Program), and Title XVII, Chapter 2 (Block Grant Funds), and its subsequent amendments (October 1998, The Coats Human Services Reauthorization Act of 1998, Title II—Community Services Block Grant Program), the block grant rules issued by the Department of Health and Human Services; and

3. Supplement the Washington State CSBG Plan, and the CSBG grant Special and General Terms and Conditions.

If these policies and procedures conflict with either the federal regulations or the State Plan, the federal statute and the State Plan will take precedence.

Policies may be revised during a program year. Proposed changes will be sent to Washington State of Community Action Programs (WSCAP) for review, and recommendations incorporated into Policies to the greatest degree possible. When changes become finalized, Grantees will be notified of the revised policy or exhibit. The revision will identify the policy, exhibit, or supporting document being cancelled.

Common acronyms and phrases being used in this manual include:

1. CSBG	Community Services Block Grant
2. CAP or CAA	Community Action Program or Agency
3. Commerce	Department of Commerce
4. CS or CSD	Community Services Division of Department of Commerce
5. HHS	U.S. Department of Health and Human Services
6. OCS	Office of Community Services of the Department of Health and Human Services
7. ROMA	Results Oriented Management and Accountability
8. WSCAP	Washington State of Community Action Partnership

These Policies are part of a Community Services Block Grant cycle that includes funding, planning, contracting, payment for services, monitoring, reporting, evaluating, training and technical assistance, and marketing (see Exhibit 1). Commerce's mission and values are foundational to this document (see exhibit 2).

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Date: 1/1/10
Cancels: n/a
See also:

100 FUNDING

POLICY 101

FAIR AND EQUITABLE RESOURCES

Commerce supports fair, equitable resources among all CSBG Grantees. This is accomplished through:

- the funding allocation formula based on census data and local poverty levels,
- the use of discretionary funding for emergencies, innovation, and other projects, and
- funding for training and technical assistance based on needs of the WSCAP network.

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Date: 1/1/07
Cancels: n/a
See also: Federal Regulations 672, 676B

100 FUNDING

POLICY 102

ELIGIBLE ENTITIES

Eligible entities for CSBG funds are the network of existing (as of 1981 when the block grant was created) community action agencies across the state with a tripartite board structure whose mission, at least in part, is to reduce poverty, revitalize low-income communities, and empower low-income families and individuals to become fully self-sufficient. These entities may be private nonprofit entities, faith-based organizations, or public organizations.

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Date: 1/1/10
Cancels: n/a
See also: Federal Regulations 676(b)(10), 676B
HHS/OCS Information Memorandum #82, 2/8/05

100 FUNDING

POLICY 103

BOARD STRUCTURE

Each community action agency shall administer the CSBG program through a tripartite board that fully participates in the development, planning, implementation, and evaluation of the program.

The members of the Board of Directors or advisory boards/councils shall consist of the following representatives:

- One-third shall be elected public officials or their representatives, or appointed public official if elected officials willing to serve cannot be found;

- At least one-third shall be representatives of low-income individuals and families in the neighborhoods served, with each representative democratically selected to represent and residing in a specific neighborhood; and

- The remaining shall be officials or members of business, industry, labor, religious, law enforcement, education, or other major community group.

Entities will have a minimum of nine (9) board members. Commerce may grant a waiver of the minimum board member requirement upon entity request. Waivers will only be granted under extenuating circumstances, such as by a limited partnership agency, or a governing board that operates within a larger government entity. If such a waiver is granted, the minimum number of board members allowed will be six (6).

Entities will have an established procedure under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board can petition for adequate representation.

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Date: 1/1/10
Cancels: n/a
See also: Federal Regulations, Sec. 678E(b)
Policy 202

200 PLANNING

POLICY 201

COMMUNITY ACTION PLAN

A Community Action Plan (also known as an application) is required yearly to receive funding. The application is a structured process that ensures community and customer input in identifying critical needs. Grantees will be notified of the due date of the Community Action Plan each fall. The following items are what should be included in the application:

1. A description of the service delivery system targeting low-income individuals and families.
2. A description of how the CSBG funds will be coordinated with other resources to fill identified gaps in service.
3. A description of how the CSBG funds will support innovative initiatives including those to promote strengthening families.
4. The Community Action Plan demonstrates how conditions or cause of poverty have been addressed or eliminated, how unmet community need is addressed, and demonstrates innovative ways of offering support.
5. An assurance the Grantee will, to the maximum extent possible, coordinate, form linkages and/or partnerships with other programs to assure effective service delivery, and avoid duplication of services. This will include a description of how the Grantee will coordinate employment and training activities under the Workforce Investment Act of 1998 and emergency energy programs (such as Low-Income Home Energy Assistance Program).
6. An assurance the Grantee will participate in the Results Oriented Management and Accountability (ROMA) system, or an alternative system for measuring performance and results that meet federal requirements.
7. Community Needs Assessment (see policy 202).

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Date: 1/1/10
Cancels: n/a
See also: Federal Regulations, Sec. 678E(b)

200 PLANNING

POLICY 202

COMMUNITY NEEDS ASSESSMENT

A comprehensive assessment of poverty conditions as well as available resources to eliminate poverty based on current published information, the Grantee's own surveys, and input from individual customers and stakeholders in low-income communities. This "community needs assessment" may be done in partnership with other agencies in the service area. At a minimum, the assessment must:

a. Be conducted at least every five years;
b. Be a written document so labeled as a "Community Needs Assessment" with the date published; used and shared in the community with partners and clients;
c. Align with ROMA by including the partners reported in National Performance Indicator 4;
d. List data sources and methods;
e. List findings and priorities;
f. Describe how priorities are addressed;
g. Include community needs assessment information in your strategic planning process.

DRAFT

Date: 1/1/10
Cancels: n/a
See also: Federal Regulations 672

200 PLANNING

POLICY 203

ALLOWABLE ACTIVITIES, USE OF FUNDS

The use of CSBG funds shall comply with the CSBG Coats Human Services Reauthorization Act of 1998 (and any subsequent reauthorizations), Sec. 672, to provide assistance to eligible entities for:

- The reduction of poverty;
- The revitalization of low-income communities; and
- The empowerment of low-income families and individuals to become fully self-sufficient.

Activities will be supported through planning and coordinating service provision; by using innovative and community-based approaches; and through broadening of the resource base. Low-income community residents will be an integral partner in these activities.

Funds shall be spent according to the Community Action Plan as approved annually by the state CSBG office. Funds may be used for:

- Training and technical assistance;
- Coordinating state-operated programs and services targeting low-income children and families to increase access to services;
- Supporting statewide coordination and communication among eligible entities;
- Analyzing the distribution of funds to determine if they have targeted the areas of greatest need;
- Supporting asset-building programs;
- Supporting innovative programs and activities to eliminate poverty, promote self-sufficiency, and promote community revitalization; and
- Supporting other activities consistent with the Act.

Commerce will award CSBG grants to eligible entities. With prior approval, funds may be subgranted to private, non-profit, or faith-based organizations in the same community. All grant terms and conditions must be passed down to subgrantees.

Per the CSBG Act of 1998, assistance is to be given in the following areas:

1. To help TANF families, homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families to:
   a) remove obstacles and solve problems that block the achievement of self-sufficiency;
   b) secure and retain meaningful employment;
   c) attain an adequate education, and improve literacy;
   d) make better use of income;
   e) obtain and maintain adequate housing;
   f) obtain emergency assistance; and
   g) achieve greater participation in community affairs, including grassroots partnerships with law enforcement, housing authorities, private foundations; and document best practice for replication.

2. To address low-income youth needs through youth development programs to support the family, prioritize youth crime prevention (e.g. through violence-free zones, youth mediation and mentoring, life skills training, job creation, entrepreneurship, after-school childcare programs).

3. To coordinate with other similar programs.

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Date: 1/1/06
Cancels: n/a
See also: Federal Regulations Sec. 676(b)(1)
Americans with Disabilities Act 1990 (42 USC 12131 et seq)
Age Discrimination Act of 1975 (42 USC 6101 et seq)

200 PLANNING

POLICY 204

NON-DISCRIMINATION

No person shall, on the basis of age, race, color, national origin or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with CSBG funds.

DRAFT

Date: 1/1/06
Cancels: n/a
See also: Federal Regulations 673 Definitions, 676(b)(1)(A)
Policy 202

200 PLANNING

POLICY 205

ELIGIBLE CLIENTS

CSBG funds are to be used to support activities designed to assist low-income families and individuals, including those receiving TANF assistance, homeless families and individuals, migrant or seasonal farm workers, and the elderly.

If CSBG funds are used to directly support an individual or family, the individual or family must fall within the poverty guidelines (at or below 125% of current poverty guideline--"FPL"--as set by OMB), or at the time of intake are homeless or abused. Applying family development principles, Grantees may continue to serve people even if their income increases above the 125% FPL until the individual or family is stabilized or self-sufficient.

DRAFT

Date: 1/1/06
Cancels: n/a
See also: Federal Regulations Sec. 678F (a), (b), and (c)
HHS/OCS Information Memorandum #3, 4/14/93
HHS/OCS Information Memorandum #81, 12/14/04

200 PLANNING

POLICY 206

LIMITATION ON USE OF FUNDS

CSBG funds may not be used for the purchase or improvement of land, or the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility.

CSBG funds may not support or be identified with supporting:

- Any partisan or nonpartisan political activity or any political activity associated with a candidate, or contending faction or group, in an election for public or party office;

- Any activity to provide voters or prospective voters with transportation to the polls or similar assistance in connection with any such election; or

- Any voter registration activity, or engagement in such activities in a manner that identifies such activities with CSBG programs or services

DRAFT

Date: 1/1/06
Cancels: n/a
See also:

200 PLANNING

POLICY 207

CLIENT FILE DOCUMENTATION

Clients served directly with CSBG funds are required to provide proof of income eligibility, with the exception of any programs that do not require proof of income eligibility, such as homeless shelters or food banks. For those programs that do not require proof of income eligibility, Grantee files must contain the following information:

a) Signed and dated client application form containing a self-declared statement of income for one, three, or twelve months prior to application, or other forms where income has been declared and number in household identified; and
b) The date and description of the services provided.

DRAFT

Date: 1/1/06
Cancels: n/a
See also: Federal Regulations 5 U.S.C. para 1501-1508

200 PLANNING

POLICY 208

HATCH ACT RESTRICTIONS

The Hatch Act restricts political activity of employees, even if CSBG funds are not used.

Employees of any entity that receives CSBG funds may not:

- Be candidates for public office in a partisan election
- Use official authority or influence to interfere with or affect the results of an election or nomination
- Directly or indirectly coerce contributions from subordinates in support of a political party or candidate

Employees of any entity that receives CSBG funds may, as long as their opinions are not identified with CSBG-funded programs:

- Run for public office on nonpartisan elections
- Campaign for and hold office in political clubs and organizations
- Actively campaign for candidates for public office in partisan and nonpartisan elections,
- Contribute money to political organizations and attend political fundraising functions

DRAFT

Date: 1/1/10
Cancels: n/a
See also: Section 400 Fiscal

300 CONTRACTING

POLICY 301

ANNUAL GRANTING CYCLE & YEARLY FUND SPEND-OUT

Commerce's annual granting cycle begins January 1, with an end date of September 30 of the next year (e.g. January 1, 2010 – September 30, 2011).

At the same time, following the submission of a completed community action plan by each CSBG Grantee, Commerce will begin a new granting cycle starting January 1 of the next year, with an end date of September 30 of that following year (e.g. January 1, 2011 – September 30, 2012).

The result is that these two grants overlap from January through September of each year. All the funds from the first year must be expended prior to expending funds from the second year.

When State General Funds are awarded to be used for the same purpose as federal CSBG funds, that grant cycle follows the state fiscal year, which begins July 1 and ends June 30 the next year. These funds may be spent concurrently with the current federal CSBG funds.

DRAFT

Date: 1/1/06
Cancels: n/a
See also: Federal Regulations, Sec. 678G(b)

300 CONTRACTING

POLICY 302

CHILD SUPPORT SERVICES

Grantees shall inform custodial parents in single-parent families that participate in CSBG-funded activities about the availability of child support services, and refer eligible parents to the appropriate state and local offices.

DRAFT

Date: 1/1/10
Cancels: n/a
See also: Federal Regulations 672
HHS/OCS Information Memorandum #20, 4/23/97
HHS/OCS Information Memorandum #37, 12/10/99
OMB Circular A-122

400 FISCAL

POLICY 401

ADMINISTRATIVE AND DIRECT EXPENSES: defined, and limits

Administrative Expenses:

A Grantee's total agency administrative funds shall not exceed 15% of their total agency budget.

Administrative costs are defined as those functions of a general nature not clearly identifiable with a particular program. These functions may include such items as: planning, budgeting, accounting and the establishment and direction of the Grantee's goals, policies, and objectives.

These administrative expenses should be billed under the linkages admin budget category.

Direct/Operational Expenses:

Direct costs can be identified with delivery of a particular project, service, or activity intended to achieve a CSBG objective. Direct costs may include such items as salaries and benefits of personnel (including for direct supervision of program services), space, supplies or equipment, training, conferences, travel, and contracts, as long as those expenses relate to a particular program or activity, and not the general administration of the organization. Some management staff time may be properly allocated to program costs, but only if the positions are not included in an indirect cost pool.

DRAFT

Date: 1/1/10
Cancels: n/a
See also: Section 400 Fiscal

400 FISCAL

POLICY 402

MONTHLY EXPENDITURE REPORT

Expenditure reports (A-19 voucher) must be submitted for each month during the grant period. The A-19 voucher must be received by Commerce on or before the 15th of the month following the prior month's expenditure. Vouchers will be held for processing pending receipt of any prior months' vouchers.

DRAFT

Date: 1/1/10
Cancels: n/a
See also: Section 400 Fiscal

400 FISCAL

POLICY 403

LINE ITEM BUDGET REVISIONS

Line item budget revision requests must be submitted to, and approved by, Commerce. Requests must include reasons for budget changes and an explanation of how this change will affect the Grantee's Community Action Plan. This allows for fund flexibility as permitted by HHS. This request must precede any subsequent A-19 vouchers.

DRAFT

Date: 1/1/10
Cancels:
See also:

400 FISCAL

POLICY 404

EXPENDITURES AND REIMBURSEMENTS

There are two reimbursement methods that can be used to pay the Grantee —the reimbursement payment method, and the advance payment method.

A. The reimbursement system pays the Grantee after expenses are incurred and required A-19 vouchers are received by Commerce monthly.
B. The advance payment method allows the Grantee to request payment for anticipated expenditures for a maximum period of one month. The Grantee must reconcile the cash payment received within 30 days after it is received. Projected cash needs must be documented and available for Commerce staff upon request. Advances are only allowed with federal funds.

An A-19 voucher for a particular month shall be received by Commerce by the 15th day of the following month. If using method B—advance payment method—when advances are reconciled, the advance balance will either be subtracted by the Grantee or by Commerce and zeroed out monthly.

Expenditures, including disbursement and unpaid accruals or approved obligations, claimed on the A-19 voucher will be reconciled against projected cash needs during the service month.

The advance payment system is a privilege, not a right, and is available only to Grantees who evidence sound fiscal and management processes. In order to receive payment by the first day of the service period, Commerce must receive a Grantee's request seven working days before the first working day of the service period.

Advance Payment Method Example:

- A Grantee requests advance for the period February 1-28.
- At the beginning of March the Grantee may also request and receive an advance payment for March 1-31.
- An A-19 voucher for February should be received by March 15 to clear the February advance.
- At the beginning of April the Grantee asks for an advance April 1-30. A Grantee shall not be paid for April 1-30 unless the A-19 voucher for February has been received and reconciled against the first advance. An A-19 voucher for March should be received by April 15 to clear the March advance.

Date: 1/1/06
Cancels: n/a
See also: Policy 407
Exhibit 5

400 FISCAL

POLICY 405

DISPOSITION OF CSBG-GENERATED INCOME

CSBG Grantees may only use generated program income (for instance income generated by interest-bearing accounts, or equipment sold surplus) for program costs.

DRAFT

Date: 1/1/06
Cancels: former Policy 504
See also: OMB Circulars A-110 and A-122
Commerce CSBG Special and General Terms & Conditions – Scope of Work
Exhibit 3 and 5

400 FISCAL

POLICY 406

NON-EXPENDABLE PROPERTY, EQUIPMENT PURCHASE

Non-expendable property purchased with CSBG funds (defined as having a useful life of more than one year and an acquisition cost of $5,000 or more per unit) shall be used by the Grantee to support CSBG related programs or projects.

Commerce must be notified within 30 days after the purchase of all nonexpendable personal property (see Exhibit 3).

The Grantee must also notify Commerce when CSBG funds are used to enter into sole source procurement for contracted services, or where only one bid or proposal is received when the contract is expected to exceed $5,000.

The CSBG Grantee may not use nonexpendable personal property acquired with grant funds to provide services for a fee to compete unfairly with private companies that provide equivalent services.

Grantees will name Commerce as lien holder on motor vehicle certificate of titles if CSBG funds used are 50% or more of the purchase price.

DRAFT

Date: 1/1/10
Cancels:
See also: Policy 405 & 406
Exhibit 4

400 FISCAL

POLICY 407

DISPOSITION OF EQUIPMENT

Agencies are required to maintain an inventory for all purchases of equipment with a useful life of one year or more and a purchase price of $5000 or more.

1. If an organization has no need for equipment purchased with CSBG funds, for a purchase price of $5000 or more, the organization must do both of the following:

   a. Notify Commerce in writing of its intent to dispose of the equipment. The notice must include a complete description, including the condition, of the equipment.

   b. Offer the equipment to the WSCAP membership.

      (1) This process is coordinated through the field representative of the organization wishing to dispose of the equipment.

      (2) Equipment will be given to organization on a first come, first served basis.

2. If no other WSCAP organization wants the equipment, the equipment may be offered for sale or donation to other local private, non-profit organizations, upon prior written Commerce approval, and provided that the organization wishing to receive the equipment performs similar social service work with low-income residents.

3. If the equipment still has a value of $5,000 or more, and no organizations want the equipment, it must, with written Commerce approval, be sold.

   a. In the event the equipment has a title, the agency must advertise the equipment in a local community publication, asking for sealed bids to be submitted by a specific date. The opening bid date must be published in the advertisement.

4. When being sold, equipment must be sold to the highest bidder.

   a. The agency must use the income in the program which originally purchased the equipment.

   b. Proceeds from equipment sales must be tracked and reported as program income.

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5. If the value of the equipment is less than $5,000, it may be disposed of at the organization's discretion.

6. Disposition of Equipment Form (exhibit 4) must be completed for all disposition of equipment initially worth more than $5,000.

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Date: 1/1/10
Cancels: n/a
See also: Section 600, Reporting
Exhibit 5

400 FISCAL

POLICY 408

YEAR-END CLOSE-OUT REPORT

CSBG Grantees are required to send Commerce a Close-Out Report no later than 45 days after the termination of the grant (see Exhibit 5). The Close-Out Report includes a budget vs. actual cost statement, program income and expenditure report, and equipment inventory (includes all nonexpendable personal property purchased with CSBG funds over $5,000).

All goods, services, and equipment to be charged to the CSBG grant must be received prior to the end of the grant.

DRAFT

Date: 1/1/10
Cancels: n/a
See also: Federal Regulations 678B
OMB circulars A-110, A-133

500 MONITORING

POLICY 501

MONITORING PHILOSOPHY

Commerce's guiding principles for monitoring:

- Are concerned with well-being of the entire agency—its systems for service delivery, administration and management, board and governance, and finances--and how it operates within the community
- Are conducted in a professional manner with consistency, clarity, respect, timeliness and two-way communication
- Are consistent with Federal requirements, the State Plan and CSBG grant requirements:

  --The Coats Human Services Reauthorization Act of 1998, and related Information Memorandums
  --Title II, CSBG Program
  --Section 678B Monitoring
  --OMB circulars A-110, A-133
  --NASCSP Monitoring Guidance

- Serve as a two-way educational experience promoting interaction, feedback, and state/local program improvement
- Acknowledge and share successes, innovations, good practices, experiences of CSBG Grantees
- Are structured to protect program integrity and sustain program support through monitoring, technical assistance, and follow-up to findings

DRAFT

Date: 1/1/10
Cancels: n/a
See also: Federal Regulations 678D

500 MONITORING

POLICY 502

COORDINATION OF MONITORING

CSBG staff will share monitoring reports with—and review monitoring reports from—other Commerce programs to stay informed about Grantee service delivery. In particular, CSBG staff will utilize Commerce Fiscal/Admin monitor for efficiency and to reduce duplication of effort.

DRAFT

Date: 1/1/10
Cancels: n/a
See also: Federal Regulations 678B
Exhibits 4

500 MONITORING

POLICY 503

RISK ASSESSMENT

Commerce performs periodic and ongoing risk assessment in the areas of financial, planning and evaluation, programs and services, human resources, community relations, leadership and governance, and results. A risk assessment score will be calculated annually for each Grantee. The score will be used to: a) determine frequency of risk monitoring, b) inform Commerce's training and technical assistance offerings to Grantees, and c) increase Commerce's ability to gauge trends in the health and well-being of Grantees over time.

Risk data may include, but is not limited to, the Grantee's annual plan, desk monitoring, on-site monitor reviews, correspondence, information from other Commerce programs, annual audits, and community partners. (See Exhibit 4 for risk assessment tool.)

DRAFT

Date: 1/1/10
Cancels:
See also: Federal Regulations 678B
Policy 505

500 MONITORING

POLICY 504

PERFORMANCE MONITORING

Monitoring is accomplished through a federally mandated comprehensive on-site review at least once every three years. More frequent monitoring may be conducted if a risk assessment indicates it is warranted. Monitoring components include:

- Risk assessment component
- On-site review
- Report (within 30 days)
- Follow up on compliance issues/areas of concern
- Fiscal monitoring
- Interim desk monitoring

The on-site monitor visit includes a review of:

- One to two years sampling of Board Minutes, to assure compliance with the tripartite board requirement, and review governance
- Agency Policies and Procedures, By-laws
- Sample client files, to document confidentiality, client eligibility
- Sample staff files, to assess personnel policies, and succession plans
- Sample CSBG fiscal back-up documentation
- Grantee's strategic planning documents

The CSBG monitoring report focuses on the systems of leadership and governance, strategic planning, partnerships/linkages/community relations, programs and services, results, and fiscal and administrative. Following the visit, an official report is sent to the Grantee Executive Director and current Board of Directors or Advisory Board/Council Chair within 30 days of the visit, and includes any key compliance issues, challenges, strengths, and any items requiring corrective action (outlined in a Quality Improvement Plan, or QIP) (see policy 505).

An annual interim desk monitor is designed to track Grantee agencies' health in years on-site reviews are not conducted. Grantees are asked to provide various documents that will aid Commerce in assessing risk.

DRAFT

Date: 1/1/10
Cancels:
See also: Policy 504

500 MONITORING

POLICY 505

QUALITY IMPROVEMENT PLAN

The Quality Improvement Plan (QIP) is a process that puts the CAA's in a leadership role. During the normal course of Commerce's administration of CSBG funds (monitoring, the application process, etc.), Commerce may identify a compliance-related issue per the terms of the grant, the state/federal Policies and Procedures, and/or the federal CSBG statutes that requires resolution. At that time, Commerce will notify the CAA that a QIP is to be completed within 30 days of notice receipt. The QIP is a form that captures the issue, the CAA's plan for resolution, the responsible party, and the expected date of resolution. This form assists both the CAA and Commerce clarify and track the issue through to resolution. A few examples are: board out of tripartite balance, a Community Needs Assessment over 5 years old, failure to submit required data, etc. (This is not designed to address minor items.)

DRAFT

Date: 1/1/06
Cancels: n/a
See also: Federal Regulations 678E
OCS Information Memo 49

600 REPORTING

POLICY 601

PRINCIPLES OF ROMA

Principles of ROMA Implementation in Washington State

- ***Implementation of ROMA in the Washington State Community Action Partnership should be consistent with OCS Information Memo 49.*** This means:
  - Focus on client, community and organizational change not particular programs and services; outcomes not outputs.
  - Recognize the interdependence of programs, clients and communities. Client improvements aggregate to, and reinforce community improvements. Strong and well-administered programs underpin both.
  - CSBG does not succeed as an individual program. Community Action succeeds best when supported by a number of funding sources organized around client and community outcomes, both within the CAA and with other service providers.

- ***Common Intake:*** Focus on the client is best accomplished if a person using CAA programs and services is considered a client of the CAA and not the individual program. The CAA should use a common intake process and form regardless of where the client entered the CAA system. With proper management this allows for an unduplicated count of clients.

- ***Comprehensive Intake:*** The CAA provides a variety of programs and services to help a client maintain or achieve self-sufficiency. It is recommended that a comprehensive intake and assessment be administered to all clients to determine who would be candidates for case-management and who would best be served using categorical programs and services. (It is estimated that approximately 25% of clients would benefit with case-management.)

- ***Organizing around the client will change the way an agency does business:***
  - Individual program or service intake and assessment forms need to be reconciled into a single common intake form.

- Data collection must use a relational database that allows for both traditional reporting by program and service (duplicated count) and by client (unduplicated count).
- Job descriptions and responsibilities may change. The trend is to train staff that can work across programs and not be program specific.

- ***Use of Outcomes and Outcome Scales varies with the client and the program or service.*** All interventions or services must have an identified outcome. Outcome scales are best used when measuring incremental change and are most useful in case-management. The development of logic models will help the CAA and the Washington State Community Action Partnership determine which type of outcome measurement best meets the needs of the client and the program or service.

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Date: 1/1/10
Cancels: n/a
See also: Federal Regulations, Sec 678E
HHS/OCS Information Memorandum #49, 2/21/01

600 REPORTING

POLICY 602

OUTCOMES REPORTING

Outcomes reporting begins with the Grantee's effective and efficient project management, including a Community Action Plan. The Community Action Plan includes program outcome targets, client narratives, innovative practices, and youth and senior programs. The CSBG Grantee will submit a mid-year Results-Oriented Management and Accountability (ROMA) report, which reports on twelve national performance indicators in the form of the National Performance Indicator (NPI) report, containing the first six months of data, to Commerce by August 15 of the current fiscal year. A final report, with twelve months of data, is due at Commerce no later than February 15 of the next fiscal year.

In addition to the outcomes reports above, the CSBG Grantee will submit a set of reports to Commerce by February 15 for the year just ended. This includes the Program Participants Characteristics Report (Section G), the CSBG Expenditures by Service Category (Section E), the Other Resources Administered and Generated by the CSBG Network Report (Section F). These reports are compiled into a statewide roll-up report by Commerce for NASCSP, who forwards on to the funder, Office of Childrens Services/HHS), as well as the ROMA/NPI year-end report.

See the table below for outcomes, fiscal, demographic, and other reports required:

ITEM:	Due Date 8/15	Due Date 2/15	Other Due Date
Program Participants Characteristics Report (Section G)	Yes	Yes	n/a
Expenditures by Service Category (Section E)	No	Yes	n/a
Other Resources Administered & Generated by the CSBG Network Report (Section F)	No	Yes	n/a
ROMA/NPI Report	Yes	Yes	n/a
CSBG ARRA 1512 Report	n/a	n/a	Quarterly: January 5, 2010, April 5, 2010, July 5, 2010, October 5, 2010
Commerce CSBG ARRA	n/a	n/a	Quarterly: January 15,

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Report			2010, April 15, 2010, July 15, 2010, October 15, 2010

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Date: 1/1/06
Cancels: n/a
See also:

700 EVALUATING

POLICY 701

CUSTOMER SERVICE SATISFACTION SURVEY

The State CSBG office will conduct an annual customer service satisfaction survey, to be sent out each fall with the Community Action Plan form to each community action agency, as a commitment to increasing communication with the community action network, and using honest feedback about our performance to inform our work.

DRAFT

Date: 1/1/10
Cancels: n/a
See also:

800 TRAINING & TECHNICAL ASSISTANCE

POLICY 801

TRAINING & TECHNICAL ASSISTANCE

Commerce will provide training and technical assistance to CSBG Grantees at their request, or when compliance issues exist, and to implement ROMA and other federal initiatives. If a Grantee is determined to be at risk or in crisis programmatically, administratively, or fiscally, Commerce will provide technical assistance to address program quality improvement to the maximum extent feasible.

DRAFT

Date: 1/1/10
Cancels: n/a
See also: Federal regulations, Sec. 672

900 MARKETING

POLICY 901

MARKETING EFFORTS

Commerce supports the Washington State Community Action Partnership (WSCAP) and individual Grantees in data-driven marketing to help tell the story of innovation, client successes, best practices, and community, and will assist with available resources within the parameters of the CSBG Act. ROMA principles in Washington State will also be used as a guide to inform marketing efforts.

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COMMUNITY SERVICES BLOCK GRANT CYCLE

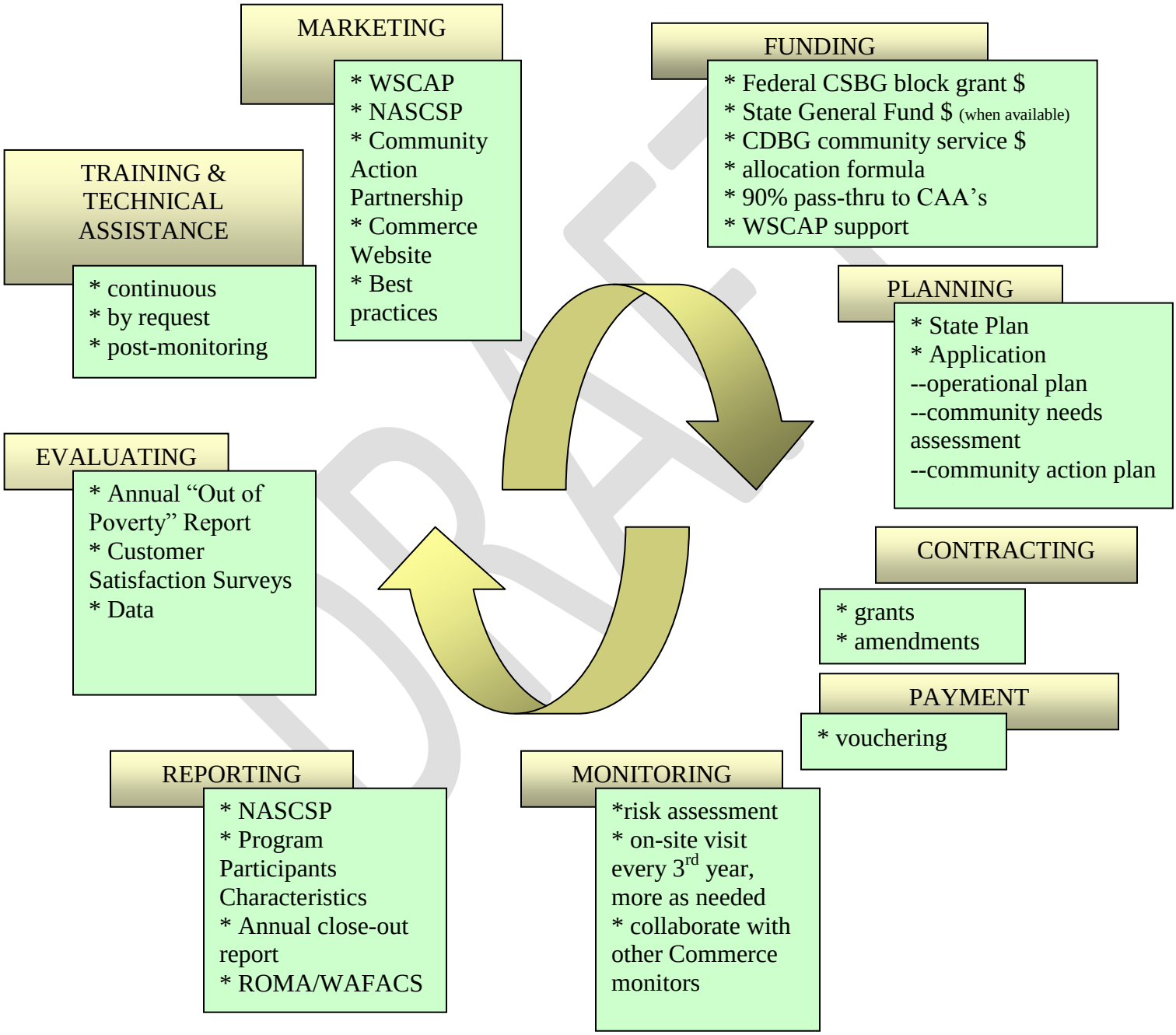

Exhibit 2

CSBG MISSION

Commerce CSBG staff commit to a quality approach to administration. We will do this by:

- following all applicable federal and state laws to their full intent;
- listening to our customers
- informing public opinion about low-income people and poverty;
- promoting ROMA and community action best practices internally and externally;
- adding value to the state Community Action network through collaboration and partnership with the Washington State Community Action Partnership; and
- identifying and creating opportunities to collaborate with other state agencies, public and private organizations that focus on anti-poverty as their mission.

VALUES

Commerce CSBG staff will infuse the following values in every aspect of our work:

- Deliver the highest level of customer service imaginable
- Maintain collegial respect for others
- Practice courage
- Make decisions that can be explained, are transparent, and are solidly based
- Maximize resources (funding, personnel, skill sets)
- Respond to the changing demographics rather than maintaining the status quo
- Honor past agreements to the degree they still make sense; use past agreements as starting point in crafting new ones
- Mitigate negative impacts due to new agreements forged (phase-in/phase-out of service delivery and/or funding levels)
- Sustain excellence

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EXHIBIT 3

NOTICE OF EQUIPMENT PURCHASE

Agency:			**Date:**	
Contact Person:				
Telephone:		**E-mail:**		

INVENTORY INFORMATION

List non-expendable personal property (defined as having a life span of at least one year and worth $5,000 or more).

Item Description	Date Purchased	Unit Cost	CSBG Grant #	ID# and location

This is to certify that:

1. The agency/department governing board or advisory committee has approved the purchase of any item costing $5,000 or more.
2. ☐ Evidence of open and competitive bids are on file **OR**
   ☐ This was a sole source procurement
3. The Agency/Department will maintain an inventory of all non-expendable personal property.

Authorized Representative (Print Name)	
Signature	Date

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EXHIBIT 4

DISPOSITION OF EQUIPMENT FORM (refer to policy 407)

Agency:			**Date:**	
Contact Person:				
Telephone:		**E-mail:**		

EQUIPMENT INFORMATION
This form serves to notify Commerce of the intent to dispose of equipment purchased with CSBG funds of $5,000 or more. Submit this form before disposing of the equipment.

Equipment Description:	
Date Purchased:	
Purchase Price:	
Current Value:	
Condition (Good, Fair, Poor)**:**	
Reason for Disposal: (no longer needed, no longer functional, no longer satisfactory, other)	

Complete the following:

A. We offered the equipment to the WSCAP membership first for sale and/or donation.
   1. ☐ Equipment has been transferred.
   2. ☐ No other WSCAP membership wanted the equipment. (If 2, continue on to B.)

B. We verified no other WSCAP organization wants the equipment and offered it for sale and/or donation to other local private non-profit organizations.
   1. ☐ Equipment has been transferred.
   2. ☐ No other non-profit wanted the equipment. (If 2, continue on to C and/or D)

C. ☐ The equipment's value is $5,000 or more and we received prior approval from Commerce to sell the equipment, and the equipment has been sold.

D. ☐ The equipment's value is less than $5,000 and we disposed of it.

Authorized Representative (Print Name and Title)	
Signature	Date

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Exhibit 5

CSBG
RISK ASSESSMENT

"Risk assessment is the process of evaluating exposure to harm or loss that could arise from some activity associated with the client service contract. It consists of identifying and classifying risks based on certain characteristics, and measuring and evaluating the consequences of these risks." (from OFM *Guide to Client Service Contracting*, 12/2000, p. 10)

Name of Organization_____
Name of Assessor(s) _____

Question	Comment	1 (low)	2	3	4	5 (hi)	na
1. FINANCIAL: Score							
a. There were findings in the last audit.							
b. There were unresolved audit findings or exceptions from prior years.							
c. The agency is typically late in drawing down funds.							
d. There have been changes in key management or financial staff.							
e. There are indications that the agency has cash flow problems.							
f. There are funds sufficient to cover expenses.							
g. Audit firm staff are trained in OMB circulars.							
2. PLANNING AND EVALUATION: Score							
a. The CSBG community plan shows that the agency							

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	understands CSBG.						
b.	**The CSBG community assessment is up-to-date and appropriate in scale.**						
c.	**The community plan shows attention to detail—complete, accurate, at least one good narrative example.**						
d.	**The agency has a strategic planning process in place.**						
e.	**The agency supports ROMA concepts and trained staff.**						
f.	**The agency uses ROMA tools.**						
g.	**The agency participates in service or resource planning with community partners such as the HUD Continuum of Care plan.**						
h.	**The agency performs a self-assessment on a regular basis.**						
i.	**The agency has a MIS that feeds info into planning process.**						
3. PROGRAMS AND SERVICES: Score							
a.	**The agency is timely with required reports of services and outcomes.**						
b.	**Services consistently meet grant goals.**						
c.	**The agency has a system to evaluate and improve programs and services.**						
d.	**The agency demonstrates effective or best practices.**						
e.	**Management of programs/services are**						

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	integrated across multiple sites.						
f.	**All Programs operate in the black.**						
g.	**Agency is on probation or has recently lost a contract due to performance issues.**						
h.	**Agency has a pending lawsuit.**						
4. HUMAN RESOURCES: Score							
i.	**Personnel policies are up-to date.**						
j.	**Agency invests in staff development.**						
k.	**Key staff are cross-trained.**						
l.	**There is stability among key staff—low turnover for Executive Director, Chief Financial Officer, Program Manager.**						
m.	**Agency has a method for routinely communicating with all staff.**						
n.	**A periodic salary survey is conducted.**						
o.	**Compensation plans are geared to enriching executives.**						
5. RELATIONSHIPS: Score							
p.	**Agency participates in collaborative projects with state agencies; local governments; and non-profit or faith-based organizations that serve low-income people.**						
q.	**Agency advocates for low-income people in the community.**						
r.	**Relationships with funders are transparent**						

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	and respectful.							
s.	**The director and staff provide leadership in the community by heading or participating on taskforces; engaging in community organizing; and actively increasing resources or quality of services for low-income people in the community.**							
t.	**The agency uses community indicators or community outcomes to measure progress.**							
u.	**There have been complaints about the agency from customers, colleagues, staff or funders.**							
6. LEADERSHIP & GOVERNANCE: Score								
v.	**The Board is in compliance with CSBG rules.**							
w.	**The Board reviews and understands financial reports.**							
x.	**Management and Board have received training to help them understand community action and poverty in the last five years.**							
y.	**Board members advocate for the agency in the community.**							
z.	**The Board evaluates the Executive Director annually.**							
aa.	**Exec Dir has a development plan that supports growth as a leader**							

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bb.	**Most (90 percent) board meetings have a quorum according to the bi-laws.**							
cc.	**Board members participate in strategic planning for the agency.**							
dd.	**Agency has a clear policy on conflict of interest.**							
ee.	**Policies address loans between agency, staff and board members.**							

RISK FACTOR: HIGH MEDIUM LOW
(Note: the higher the number, the lower the risk)

LAST CSBG MONITORING VISIT _____

BASED ON THIS RISK ASSESSMENT, A COMMERCE MONITORING VISIT IS RECOMMENDED
☐ YES ☐ NO

A COMMERCE MONITORING VISIT IS SCHEDULED FOR _____

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EXHIBIT 6

CSBG CLOSE-OUT REPORT FORM

STATE OF WASHINGTON
DEPARTMENT OF COMMERCE

Name of Agency:			
Contact Person:		**Position:**	
Telephone:		**Email:**	
Grant Fiscal Year:			
Grant Period:			
Grant #:			

CHECKLIST

Prepare and submit one copy of this close-out report within 45 days **after expending all grant funds.**

	FORM	TITLE
☐	**1**	Budget vs. Actual Cost Statement
☐	**2**	Program Income and Expenditure Report
☐	**3**	Equipment Inventory (includes all non-expendable personal property over $5,000)

CERTIFICATION

I certify that the information provided is accurate and complete and that there are no outstanding requests for reimbursement under the CSBG Grant No._____

Name and Position Typed or Printed	
Signature	Date of Certification

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FORM 1 **BUDGET VS. ACTUAL COST STATEMENT**

REGULAR CSBG ALLOCATION

BUDGET CATEGORY	FINAL BUDGET	ACTUAL COSTS	BALANCE
Employment	$	$	$
Education	$	$	$
Money Management	$	$	$
Housing	$	$	$
Emergency Assistance	$	$	$
Nutrition	$	$	$
Linkages	$	$	$
Self-Sufficiency/Case Management	$	$	$
Health	$	$	$
(Note: admin $$s contained within each line item)			
TOTALS	$	$	$

DISCRETIONARY FUNDS

BUDGET CATEGORY	FINAL BUDGET	ACTUAL COSTS	BALANCE
Employment	$	$	$
Education	$	$	$
Money Management	$	$	$
Housing	$	$	$
Emergency Assistance	$	$	$
Nutrition	$	$	$
Linkages	$	$	$
Self-Sufficiency/Case Management	$	$	$
Health	$	$	$

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Training or Technical Assistance	$	$	$
TOTALS	$	$	$

FORM 2: PROGRAM INCOME AND EXPENDITURE REPORT

PROGRAM INCOME REPORT **(complete if your organization is undertaking activities likely to result in program income)**

A. Amount of Program Income Earned During Grant Period:

Interest	$
Fees	$
Rent	$
Other (specify)	$
	$
	$
Total Earned Income During Grant Period	$

B.

Total Program Income Available for the grant year	$

C.

Amount Expended on Grant Activities for Grant Period	$

DEVELOPMENT OF PROJECT MATERIALS **(complete if your organization has developed patents, patent rights, inventions, original books, manuals, films, or other patentable or copyrightable materials, in whole or part with CSBG funds—See CSBG General Terms and Conditions, section 12, Copyright Provisions.)**

.....**List**

Patents or patent rights	
Copyrights or copyrightable materials	
Original books, manuals, films	
Other products	

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FORM 3: **NONEXPENDABLE PERSONAL PROPERTY AND EQUIPMENT INVENTORY**

INSTRUCTIONS

A physical inventory must be taken of all equipment with a useful life of more than one year and an acquisition cost of $5,000 or more per unit or a serial number attached by the manufacturer of the property purchased under this grant or previous Community Services Block Grant Program grants.

DEFINITION OF TERMS

Date of Purchase	-	Month and Year of Purchase
Item and Description	-	Brand Name and Type of Item (for example - Steelcase, 4-drawer file)
Identification Number	-	Manufacturer's Serial Number(s), Model Number, and Grantee's Inventory Identification Number(s)
Condition	-	G - Good, F - Fair, P - Poor
Quantity	-	Number of Items Purchased
Unit Cost	-	Cost at the Time of Purchase

Funding Source: Department of Health and Human Services
Program: COMMUNITY SERVICES BLOCK GRANT

NONEXPENDABLE PERSONAL PROPERTY AND EQUIPMENT INVENTORY (See Policy 406 CSBG Policies)

Date of Purchase	Item and Description	Identification Number or Tag	Condition	Quantity	Unit Cost

Total Cost of Items:	$

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TRANSFER OF INTEREST

The Department's interest in property purchased under prior contracts or grants are automatically transferred to the current year at the end of the prior grant/contract period.

VEHICLE RECORD (Submit one form for each vehicle)

Description	
Make and Body Style	
Year and Model	
Gross Weight/Empty Weight	

Identification	
Manufacturer's Serial No.	
License No.	
Title/Registration	

Acquisition	
Date of Purchase	
Purchase Price	
Mileage at Purchase Date	
Current Mileage	
Address/Location Assigned	

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EXHIBIT 7

COMMUNITY SERVICES BLOCK GRANT KEY PROCESSES

Funding

Federal Appropriation: CSBG funds are appropriated annually. Each appropriation covers a two-year period. The annual federal budget is often not passed in time for the State to allocate funds based on an actual appropriation. In practice, Commerce operates through a series of continuing resolutions that partially release funds so that programs operate continuously with out knowing their level of funding.

Notifications of appropriation level or continuing resolution are mailed to Commerce's Director.

Community Development Block Grant Funding for Public Services: CDBG Public Services funds are contracted to CSBG eligible entities in non-entitlement areas of the State through County Governments. As a result, the processes for CSBG and CDBG Public Services intersect.

Eligible Entities

There are 31 eligible entities that must receive at least 90 percent of the federal appropriation for Washington State. Thirty are multi-service community action agencies and one is a Limited Purpose Agency.

The State may use up to five percent of the block grant for administration and an additional five percent for discretionary purposes. Traditionally, some of the discretionary funds support WSAP.

The process for terminating eligibility for a CSBG eligible entity is prescriptive lengthy, and requires a public hearing process. The State must provide technical assistance before a termination process can begin.

Twelve of the eligible entities receive CDBG Public Service finds.

Planning (application)

State Plan: The State must submit a plan every two years. The plan is Commerce's application for federal funding. It must have a public hearing, public comment period. A legislative hearing must occur every three years. The plan makes administrative and programmatic assurances to the federal government; lists eligible entities—their service areas and planned funding levels; describes the allocation formula and planned uses of block grant funds; provides an overview of CSBG community assessments and Results Oriented Management and Accountability (ROMA) implementation; details state monitoring practices and explains how additional funds for the Community Food and Nutrition Program will be used.

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Community Action Plans and Community Needs Assessments: Annual Community Action Plans with community needs assessments serve as annual applications for funding from eligible entities to the State. Plans must include the eligible entity's mission, community assessment methodology, priority needs and plan for addressing priority needs; service locations; service linkages; narrative examples of program impacts; innovations and local collaborations; descriptions of programs for youth and seniors; budget details; projected outcome targets for families, agencies and communities; board composition; and mandatory federal assurances.

Applications are due in late fall.

Risk Assessment

A risk assessment is conducted as part of the process of reviewing the plan for each eligible entity.

Contracting

In an eighteen-month cycle, Commerce grants run from January to September. Every year, two grants overlap for nine months of the year. Commerce will not reimburse for funds from the most recent grant until the prior grant has been closed out.

Grants are amended when the federal budget passes to bring projected State allocations into alignment with actual federal appropriations.

Performance Measurement and Reporting

Eligible entities report on outcomes to Commerce twice a year in February and August and compare actual results to the targets set in their annual plans. The state and eligible entities are required to use ROMA principles and tools to report under the six national goals (2 family goals, 2 agency goals and 2 community goals) and 12 national indicators for CSBG.

The State uses a database supplied by the National Association of State Community Services Programs (NASCSP) to report financial data, local service outcomes for families, agencies and communities; client demographics, best practices and innovations, and State achievements.

CSBG outcomes include outcomes for all of the funding that an eligible entity receives regardless of fund source.

Fiscal Reporting

Eligible entities report monthly. Commerce advances funds to Grantees in good standing.

A detailed report is required when funds in a grant have been totally expended. Commerce provides a detailed closeout report to HHS.

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Monitoring

By law, the state must monitor each of the 31 eligible entities once every three years. Commerce monitors according to a plan based on risk assessment and last monitoring date. The state monitors according to the systems of leadership and governance, strategic planning, partnerships/linkages/community relations, programs and services, results, and fiscal and administrative.

Training and Technical Assistance

The State is responsible for providing training and technical assistance to eligible entities who request it, and for those who are out of compliance and to implement ROMA and other federal initiatives. Commerce grants with the Washington State Community Action Partnership to provide training and technical assistance for eligible entities.

Contact Person

Rogers Weed, Director is the Governor's delegated official responsible for CSBG implementation.

Maitri Sojourner, Program Manager
Community Services Division
725-2851
maitri.sojourner@commerce.wa.gov

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