Orientation to the Division of Community Assistance (DCA) and Overview of Information Memorandums (IM)

2018 NASCSP Winter Conference
Monday, February 26, 2018, 10:00am

Presenters: Seth Hassett, CDR Bill Bolduc & David Barrie

Agenda

- OCS Organizational Chart
- Community Service Block Grant (CSBG) Program Operations
  - CSBG Performance Management
  - Training and Technical Assistance
- Financial Operations & Accountability Branch
  - Grant Monitoring

Administration for Children and Families (ACF)
The Office of Community Services (OCS)

Division of Community Assistance (DCA)

DCA Functions

- Review and accept annual state and Tribal CSBG plans
- Review and provide feedback on annual reports
- Oversee training and technical assistance grants and contracts
- Communicate with and update the Network on CSBG initiatives
- Monitor and assess state CSBG implementation
- Develop CSBG performance measurement and reporting procedures and systems
- Assist states with Federal review and complaint processes
What to Expect from DCA

- Quarterly Calls with States and RPICs
  - Building relationships with OCS and peers
  - Brainstorming ideas and improving processes
  - Identifying and addressing concerns
  - Networking opportunities
  - Webinars

- Enhanced Technical Assistance Efforts
  - System improvements
  - Regional technical assistance

- Regular Communication
  - Sharing best practices and outreach information
  - Updates via Information Memoranda, Dear Colleague Letters, and Action Transmittals

- Site Visits for State Assessments

CSBG Functions

- In line with those of the DCA:
  - Review and accept annual state and Tribal CSBG plans
  - Review and accept state annual reports
  - Oversee training and technical assistance grants and contracts
  - Communicate with and update the Network on CSBG initiatives
  - Monitor and assess state CSBG implementation
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Key CSBG Communication Channels

**Purpose:** To communicate to the CSBG Network OCS initiatives

- **Information Memorandum** – provides guidance to assist in implementing the CSBG legislation, program instruction and policy clarification.

- **Dear Colleague Letter** – provides updates on CSBG funding, initiatives and program developments.

- **Action Transmittal** – provides information and guidance to the network on initiatives where a specific action is required.
CSBG Communications: Key CSBG IMs

<table>
<thead>
<tr>
<th>IM #</th>
<th>Topic</th>
<th>Description</th>
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<tbody>
<tr>
<td>116</td>
<td>Corrective Action, Termination, or Reduction of Funding (April 2, 2010)</td>
<td>Provides background on statutory and regulatory requirements for terminating organizational eligibility or otherwise reducing the share of funding allocated to any CSBG-eligible entity. Provides step-by-step guidance 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.</td>
</tr>
<tr>
<td>138</td>
<td>State Establishment of Organizational Standards for CSBG Eligible Entities (January 26, 2015)</td>
<td>Provides guidance to OCS, states, the District of Columbia, and U.S. Territories about their roles and responsibilities for the establishment of organizational standards for CSBG eligible entities. This IM includes background information on organizational standards and the process for implementation.</td>
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<tr>
<td>144</td>
<td>State and Federal Accountability Measures and Data Collection Modernization (October 2, 2015)</td>
<td>Developed to track organizational performance by State CSBG Lead Agencies and OCS to help the CSBG Network increase accountability and achieve results. The measures are designed to create intergovernmental accountability through transparent and Federal and State-based reporting and auditing. This IM includes a background on data collection and accountability measures and a description of their implementation.</td>
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<td>151</td>
<td>Training and Technical Assistance Strategy (January 19, 2017)</td>
<td>Lays out a three-year Training and Technical Assistance strategy to guide both the development and delivery of training and technical assistance for the CSBG network. The strategy includes a detailed technical assistance needs and priorities expressed by the network, and culminates in a multi-layered framework for meeting those needs and priorities.</td>
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<td>152</td>
<td>Annual Report (January 19, 2017)</td>
<td>Provides guidance to State and Territory CSBG Lead Agencies, State Community Action Association Eligible Entities, and National Partner Associations on the implementation and timelines for online submission of the CSBG Annual Report. Details the roles and responsibilities of the states and eligible entities in this key area of performance management.</td>
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CSBG Program Operations Areas

1. Performance Management
   - Performance Management Framework Implementation
     - ROMA Next Generation
     - State and Tribal Plan Submission and Review Process
     - Annual Report submission and review process
     - ACSI Survey implementation
   - Data Analysis
     - Helping states and Tribes analyze and interpret data for continuous improvement

CSBG Key Area 1: Performance Management

- Performance Management Framework Implementation
- Data Analysis

CSBG Performance Management: Vision

- Takes an inclusive, multi-pronged approach
- Provides accountability at 3 levels (local, state, Federal)
- Ensures efficiency and effectiveness
- Incorporates extensive input from the CSBG Network
- Demonstrates stronger results for low-income families and communities nationwide
Organizational Standards

**Purpose:** to ensure that all eligible entities have appropriate organizational capacity to deliver services to low-income individuals and communities

- CSBG Organizational Standards Center of Excellence (COE)
- 3 thematic groups; 9 categories; 58 standards
- Detailed in IM No. 138 | Released January 26, 2015
- Implemented in FY 2016
- Assessed for the 1st time in 2017 through the FY 2016 Annual Report
- Will not be updated for FY 2017
CSBG Organizational Standards for Eligible Entities Timeline

<table>
<thead>
<tr>
<th>Year</th>
<th>First Year Implementation and Assessment</th>
<th>Fiscal Year 2015</th>
<th>Fiscal Year 2016</th>
<th>Fiscal Year 2017</th>
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<tbody>
<tr>
<td>2014</td>
<td>Oct. 1 - 2014</td>
<td>Q1</td>
<td>Q2</td>
<td>Q3</td>
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<tr>
<td>2015</td>
<td>Sept. 30 - 2015</td>
<td>Q4</td>
<td>Q1</td>
<td>Q2</td>
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<tr>
<td>2016</td>
<td>Sept. 30 - 2016</td>
<td>Q3</td>
<td>Q4</td>
<td>Q1</td>
</tr>
<tr>
<td>2017</td>
<td>Sept. 30 - 2017</td>
<td>Q2</td>
<td>Q3</td>
<td>Q4</td>
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CSBG Organizational Standards “Snapshots”

- CSBG Organizational Standards “Snapshots”
- CSBG Organizational Standards for Eligible Entities

State and Federal Accountability Measures

- Two sets of measures - for state agencies and OCS - to track performance in critical activities and functions
- Developed with extensive CSBG Network input
- Detailed in IM No. 144 | released October 2, 2015
- Collected through:
  - State Plan
  - Annual Report
- Implemented: FY 2016
Accountability Measures Categories

Both State and Federal measures include measures for customer satisfaction/feedback

<table>
<thead>
<tr>
<th>For States</th>
<th>For OCS</th>
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<tbody>
<tr>
<td>• State plan development</td>
<td>• State plan review and acceptance</td>
</tr>
<tr>
<td>• Distribution of funds</td>
<td>• Distribution of funds</td>
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<tr>
<td>• Use of remainder/discretionary funds</td>
<td>• Grant monitoring and corrective action</td>
</tr>
<tr>
<td>• Grantee monitoring and corrective action</td>
<td>• Data collection, analysis, and reporting</td>
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<tr>
<td>• Data collection, analysis, and reporting</td>
<td>• Organizational standards</td>
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<tr>
<td>• Organizational standards for eligible entities</td>
<td>• Training and technical assistance</td>
</tr>
<tr>
<td>• State linkages and communication</td>
<td>• Communications</td>
</tr>
<tr>
<td>• Grantee satisfaction</td>
<td>• Grantee satisfaction</td>
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Although this date is 3/28/15, IM no. 144 of State/Fed Acct Msrs is 10/2/15. Which is correct?
Roneika Carr, 2/22/2017
National Performance Indicators (ROMA NG) Timeline

CSBG State Plan
- Information Memoranda (IM) 140 and 141 informed States, Tribes, and Territories of Fiscal Year (FY) 2016 CSBG application requirements
- OMB Cleared in FY2016
- Automated application in OLDC
- OCS completed the Full CSBG State Plan Review/acceptance process in March 2016
- Review Tool/Initial feedback from OCS in OLDC
- New CSP in July 2018
- Submission deadline: September 1, 2018

CSBG Annual Report
- OMB-Cleared Module 1 – State Administration section - in OLDC: January 12, 2017
- Online data collection for FY 2016 annual report
- Auto-populated sections from the CSBG Model State Plan
- Detailed in IM No. 152 released on January 20, 2017
- FY 2017 Module 1 launch: January 2018
- Submission deadline: March 31, 2018
- Modules 2-4 entered in the Information Systems (IS) Access Database
CSBG Key Area 2:
T/TA for State and Tribal Grantees

- Direct Technical Assistance to State and Tribal Grantees
  - Responding to Policy Questions
    CSBGStates@acf.hhs.gov;
    CSBGTribes@acf.hhs.gov
  - Hosting Quarterly Conference Calls w/all Grantees
  - Providing Grantee Consultations at National Meetings
- Oversight of National TA Cooperative Agreements and Grants
- RPIC Grantee Lead Coordination

Current CSBG Training and Technical Assistance Projects

- Cooperative Agreements
  - Nationwide Performance Management System Development and Data Collection, Analysis and Reporting for CSBG
  - CSBG Legal Training and Technical Assistance
  - Organizational Standards Center of Excellence
  - CSBG Learning Communities Resource Center
  - Regional Performance and Innovation Consortia (RPIC)
- Contract
  - CSBG Tribal Technical Assistance

CSBG Key Area 3:
Customized Assistance for Grantees

- State Assessments
- Follow Up Topical Conference Calls/Webinars (in part, developed based on data from State Plan and Annual Report Cycle)
CSBG Grant Monitoring

Financial Operations & Accountability Branch (FOAB)

CSBG Monitoring Infrastructure

<table>
<thead>
<tr>
<th>Federal Monitoring</th>
<th>State Monitoring</th>
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<tbody>
<tr>
<td>• Annual review of State CSBG Plans to assure compliance with statutory requirements</td>
<td>• Annual review of eligible entity needs assessments and plans</td>
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<tr>
<td>• Statutorily Required State Assessments</td>
<td>• Statutorily Required Full Onsite Review of Eligible Entities – At least once every 3 years</td>
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<td>• Risk Assessment of States</td>
<td>• Onsite review of newly designated entities</td>
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<td>• Ad Hoc Financial Monitoring – Review of Audit Results</td>
<td>• Follow-up reviews with eligible entities that fail to meet the goals, standards, and requirements established by the State</td>
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<tr>
<td>• Review of State Corrective Action Plans</td>
<td>• Other reviews as appropriate</td>
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<tr>
<td>• Other reviews as appropriate to assure program integrity</td>
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Monitoring Procedures and Tools – Regular CSBG

• CSBG Monitoring Checklist (IM No. 102)
• State Assessments – Sample of States
  - Desk
  - On-Site
CSBG FOAB: State Assessments

- OCS Will Evaluate:
  - Compliance to CSBG Statute and Federal Regulations
  - State Monitoring of Eligible Entities
  - Federal Reporting of CSBG Program and Financial Data
  - Internal Policies and Procedures

State Assessments are also a means by which we gather information on practices and strategies that grantees and eligible entities have successfully used to implement and execute programmatic and administrative efforts.

CSBG FOAB: What We Do

- Perform Risk Assessments
- Conduct State Assessments, Follow-up & Federal Reviews
- Provide Training and Technical Assistance & Financial Operations Support

Risk Assessment for CSBG Monitoring

- Assess time since last full on-site monitoring review
- Review of program and financial data
- Analysis of Single Audit findings for CSBG and other ACF Programs
- Analysis of routinely available program information such as state staff turnover and unresolved findings.
State Assessment
Pre-Planning Field Work Process

- Coordinate with State CSBG Office
- Select eligible entities for a site visit
- Identify specific technical assistance needs of the state
- Data Analytics
  - Analysis of eligible entities' financial position (Financial Ratios)
- Review of Documentation
  - Verify state plan assurances
  - Evaluate state monitoring of eligible entities
  - Review Single Audit procedures for state and eligible entities
- Confirm State and CSBG Milestones
- Select eligible entities for site visits
-Obtain specific technical assistance needs of the state

State Assessment
Field Work Process

- Kick-Off Meeting
  - Explanation of the process and anticipated deadlines
- Interviews with key staff, perform observations, and conduct sampling
  - Program and Fiscal Monitoring staff
  - Financial and Accounting representatives
- Evaluate the State Assessment Tool
  - Assure compliance to CSBG and Appropriations Acts
  - Assure compliance to Block Grant rules and other requirements
- Exit Conference
  - Report observations, questioned costs, and potential findings
  - Discuss opportunities for improvement
  - Discuss areas of strengths and weaknesses
  - Discuss timeline of draft report and next steps

State Assessment
Post Field Work Process

- Address instances of best practices, exceptions, and open items
- Prepare Draft Report
  - Meet the Federal Accountability Measure – Benchmark 30 Days
  - Respond within 30 Days
- Final Report
  - Incorporate state responses into the report
  - Evaluate the response and determine next steps
- Follow-Up
  - Periodically check in to determine if any necessary corrective action was implemented
  - Share observations that are not reportable with the state, if applicable