



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**

Office of Community Services | 330 C Street, S.W., Washington, DC 20201  
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**Community Services Block Grant  
Action Transmittal**

**AT#:** [CSBG-AT-2019-05]  
**DATE:** July 29, 2019  
**TO:** [CSBG States and Territories]  
**SUBJECT:** [Application for Fiscal Year (FY) 2020 CSBG Funds Based on the Availability of CSBG Funds]  
**ATTACHMENT(S):** [Attachment A: Submission Groups by State and Attachment B: Pre-Populated Questions]

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**RELATED REFERENCES:**

Community Services Block Grant Act, Title VI, Subtitle B, of the Omnibus Budget Reconciliation Act of 1981, Public Law 97-35, as amended; Human Services Amendments of 1994, P.L.103-252; the FY 1996 CSBG Appropriation Legislation, P.L.104-134; CFR Title 45, Part 96; Coats Human Services Reauthorization Act of 1998, P. L. 105-285; Department of Health and Human Services Block Grant Regulations and Current Poverty Income Guidelines.

**PURPOSE:**

To inform states and U.S. territories of the Community Services Block Grant (CSBG) application requirements for Federal Fiscal Year (FFY) 2020. To qualify for FFY 2020 CSBG funding, states and territories must submit their state plan applications to the Office of Community Service (OCS) by September 1, 2019 using the approved online CSBG State Plan format. States and territories shall submit their information electronically through the Administration for Children and Families (ACF) On-Line Data Collection system (OLDC).

**BACKGROUND:**

According to Section 676(b) of the CSBG Act, states, including territories, must prepare and submit a State Plan for CSBG funding. OCS provides funds to CSBG grantees based on the determination that their State Plan, which also serves as an application, is complete and in accordance with all requirements of the CSBG Act.

The CSBG State Plan is a critical document for both state and federal oversight of CSBG. The CSBG State Plan – submitted through OLDC – integrates and aligns requirements from the CSBG Act with elements of the overall CSBG Performance Management and Accountability framework. This framework includes 1) organizational standards for CSBG eligible entities, 2) accountability measures at the state and federal levels, and 3) Results Oriented Management and Accountability (ROMA) (or another performance management system). Ultimately, this framework will enable the CSBG Network (local, state, and federal levels) to continuously improve their programs and generate breakthrough outcomes for families, individuals, and communities with low-incomes. Operation of CSBG in accordance with these plans will be dependent on enactment of FFY 2020 appropriations supporting CSBG.

For more information about the CSBG Performance Management and Accountability Framework, see the following Information Memoranda (IM):

[IM 138: State Establishment of Organizational Standards for CSBG Eligible Entities](#)

[IM 144: CSBG State and Federal Accountability Measures and Data Collection Modernization;](#)  
and

[IM 152: CSBG Annual Report.](#)

#### **SUBMISSION AND REQUIREMENTS:**

CSBG applications for FFY 2020 are due to OCS by September 1, 2019. States have the option of submitting a state plan annually (covering one federal fiscal year) or biannually (covering two federal fiscal years) as per the CSBG statute. States must submit their plans electronically through OLDC, which will become available for entry and submission beginning July 30, 2019.

As with last year, states will not be able to “clone” their previous submission in developing this year’s submission. Rather, responses from the last state plan submission will pre-populate in most questions. See Attachment A for additional information about these items.

A **full submission** includes the: 1) CSBG Eligible Entity Master List (a separate form available in OLDC); 2) Standard Form for Federal Assistance (SF-424M) [the cover page of the CSBG State Plan]; 3) CSBG State Plan Sections 1 – 14; and 4) Certifications as defined by the CSBG statute (Section 15). Once all forms are complete, the **authorized official**, as designated in the designation letter (Section 1, Question 1.3), must certify the CSBG State Plan within OLDC per CSBG statute.

#### *CSBG Eligible Entity Master List*

The CSBG Eligible Entity Master List (introduced last year) is available within OLDC. States are only required to revise the Master List if there were changes to the eligible entities within the state since the last submission. States must submit the CSBG Eligible Entity Master List prior to initializing this year’s CSBG State Plan. For more information, review [Action Transmittal \(AT\) 04 CSBG Eligible Entity Master List](#).

### *CSBG State Plan*

The Office of Management and Budget (OMB) approved the streamlined and automated CSBG State Plan through the Paperwork Reduction Act (PRA) process for a three-year period (FFY 2019 – FFY 2021). There are no additions or revisions to the plan for FFY 2020. For background information about the development and content of the CSBG State Plan, please see the following Dear Colleague messages:

[CSBG State Plan Revision: Open Comment Period](#); and  
[CSBG State Plan Revisions: Second Open Comment Period](#).

*Content areas for the FFY 2020 CSBG State Plan submission:*

CSBG Cover Page (SF-424M)

Section 1: CSBG Administrative Information

Section 2: State Legislation and Regulation

Section 3: State Plan Development and Statewide Goals

Section 4: CSBG Hearing Requirements

Section 5: CSBG Eligible Entities

Section 6: Organizational Standards for Eligible Entities

Section 7: State Use of Funds

Section 8: State Training and Technical Assistance

Section 9: State Linkages and Communication

Section 10: Monitoring, Corrective Action, and Fiscal Controls

Section 11: Eligible Entity Tripartite Board

Section 12: Individual and Community Income Eligibility Requirements

Section 13: Results Oriented Management and Accountability (ROMA) System

Section 14: CSBG Programmatic Assurances and Information Narrative

Section 15: Federal Certifications

Based on FFY 2019 CSBG State Plan submissions, states will fall under one of the following submission groups, which are further defined in Attachment B:

*Group A: 37 states with Accepted One- or Two-Year Plans ending September 30, 2019*

For the FFY 2020 CSBG State Plan cycle, these 37 states must complete a full submission as defined above. The plan will be subject to all requirements of the CSBG Act, including the public hearing requirement. **Please attend the webinar on August 13 (more information below).**

*Group B: 15 states with Accepted Two-Year Plans ending September 30, 2020*

States that fall within this group have two options as outlined below:

Option 1: Solely complete the CSBG Eligible Entity Master List and the SF-424M as separate forms through OLDC. Choose *this option if the state has no revisions to their currently accepted two-year plan.*

Option 2: If a state elects to submit revisions to its accepted CSBG State Plan, it is subject to the requirements of submitting a full plan as detailed above, including having the authorized official certify the report.

Note: OCS does not require states to revise their accepted plans, and only suggests doing so for major revisions. Major revisions include, but are not limited to: making a change to the state's plan for usage of funds (Section 7), significant proposed changes to state CSBG policies/procedures (Section 3, Section 10, etc.), and/or revising how the state intends to assess Organizational Standards (Section 6).

If the state is changing its distribution formula for eligible entities, adding or removing eligible entities, or reducing or terminating the proportionate share of funding to an eligible entity, the state must hold a new hearing. Regardless of whether there is a hearing, the state should distribute the revised plan to eligible entities.

**Please attend the webinar on August 20 (more information below).**

## **FFY 2019 ANNUAL REPORT REQUIREMENT**

Section 678E(a)(2) of the CSBG Act requires states to prepare and submit an annual report on the activities and performance of the state and its eligible entities. As of 2019, states submit the CSBG Annual Report through OLDC. Submitting the CSBG Annual Report annually through OLDC fulfills CSBG statute requirements as outlined above. States are no longer required to send OCS an email detailing how they plan to submit their Annual Report. OCS will provide additional information about the submission of the FY 2019 CSBG Annual Report in the upcoming months.

## **ADDITIONAL INFORMATION:**

### **Capital Improvement and Construction Waivers**

In accordance with Section 678F(a)(2) of the CSBG Act, OCS must approve waivers, in writing, before block grant funds can be used for capital improvement and construction purposes. If a state anticipates the need for a waiver, a waiver request must be submitted to OCS by the state, not the eligible entity. If there is a need for a waiver request, such requests should address the requirements referenced in Section 678F(a)(2) of the CSBG Act and [IM 60: Duties and Interests with Respect to Property, Purchased, Constructed, or Improved by an Eligible Entity](#).

### **Proportionate Share of Funding**

States are required to provide each eligible entity, currently in good standing within the state, its proportionate share of any CSBG funding received by the state. A decision by a state not to provide a proportionate share in funding to an eligible entity will be considered as a reduction of funding under Sections 676(b)(8) and 678C of the CSBG Act. Reduction of funding must be for cause and is subject to a statutory requirements as described in [IM 116: Corrective Action, Termination, or Reduction of Funding](#).

## **Collaboration with Faith-Based Organizations**

States must provide an assurance (included in the CSBG State Plan under Section 9, Question 9.6) that is signed by the CSBG State Designated Official and addresses the requirements of Section 679 of the CSBG Act, entitled “Operational Rule:”

- “a) **Religious Organizations Included as Nongovernmental Providers.** – For any program carried out by the Federal Government, or by a State or local government under [the CSBG Act], the government shall consider, on the same basis as other nongovernmental organizations, religious organizations to provide the assistance under the program, so long as the program is implemented in a manner consistent with the Establishment Clause of the first amendment of the Constitution. Neither the Federal Government nor a State or local government receiving funds under this subtitle shall discriminate against an organization that provides assistance under, or applies to provide assistance under, this subtitle, on the basis that the organization has a religious character.
- “b) **Religious Character and Independence.**
  - “(1) **In General.** – A religious organization that provides assistance under a program described in subsection (a) shall retain its religious character and control over the definition, development, practice, and expression of its religious beliefs.
  - “(2) **Additional Safeguards.** – Neither the Federal Government nor a State or a local government shall require a religious organization—
    - “(A) To alter its form of internal governance, except (for purposes of administration of the community services block grant program) as provided in section 676B; or
    - “(B) To remove religious art, icons, scripture, or other symbols; in order to be eligible to provide assistance under a program described in subsection (a).
  - “(3) **Employment Practices.** – A religious organization's exemption provided under section 702 of the Civil Rights Act of 1964 (42 U.S.C. 2000e-1) regarding employment practices shall not be affected by its participation in, or receipt of funds from, program described in subsection (a).
- “c) **Limitations on Use of Funds for Certain Purposes.** – No funds provided directly to a religious organization to provide assistance under any program described in subsection (a) shall be expended for sectarian worship, instruction, or proselytization.
- “d) **Fiscal Accountability.** –
  - “(1) **In General.** – Except as provided in paragraph (2), any religious organization providing assistance under any program described in subsection (a) shall be subject to the same regulations as other nongovernmental organizations to account in accord with generally accepted accounting principles for the use of such funds provided under such program.
  - “(2) **Limited Audit.** – Such organization shall segregate government funds provided under such program into a separate account. Only the government funds shall be subject to audit by the government.
- “e) **Treatment of Eligible Entities and Other Intermediate Organizations.** – If an eligible entity or other organization (referred to in this subsection as an 'intermediate

organization'), acting under a contract, or grant or other agreement, with the Federal Government or a State or local government, is given the authority under the contract or agreement to select nongovernmental organizations to provide assistance under the programs described in subsection (a), the intermediate organization shall have the same duties under this section as the government.”

#### **TRAINING, TECHNICAL ASSISTANCE AND SUPPORT:**

OCS will hold two webinars in August:

August 13, 2:00pm ET: Submitting the CSBG State Plan within OLDC (*intended for Group A*)

August 20, 2:00pm ET: Submitting the SF-424M within OLDC (*intended for Group B*)

View previous webinars [here](#).

OCS encourages all states to review OLDC access information, ensuring that state staff have been registered in the correct roles for the state plan submission process. Please keep in mind:

- States should have at least one individual assigned as the Grant Administrator
  - This person is able to submit, un-submit, and enter data into all CSBG forms within OLDC.
- States should have at least one individual assigned as the Authorized Official.
  - The Authorized Official must be the individual (e.g., director, secretary, or commissioner) designated in the CSBG state designation letter, or that person’s official designee. OCS will not accept any CSBG State Plan that does not include a designation letter that clearly specifies the designated lead agency and the title of the official who is authorized to certify the CSBG State Plan.
- To request OLDC access for CSBG staff, or to make changes to an existing account, please complete the [OLDC Access Form](#).
  - An individual who already has access to OLDC for another program (e.g., LIHEAP), must still submit an official request to add CSBG to his/her account. (The individual will use one username and password to login to OLDC, and then may select from the menu of programs included in his/her account.)

***Note: As of this year, the Office of Grants Management will issue the Notice of Grant Award electronically via email distribution to the Authorized Official noted within OLDC on the SF-424M. Therefore, all states must ensure that the Authorized Official email contact information is accurate.***

If states have questions regarding OLDC system access and/or to submit a completed form, please send to [Niki Frazier](#) and [Monique Alcantara](#) in the Division of Community Assistance.

If states have questions in regards to the content of the CSBG State Plan, contact the respective [Federal CSBG Program Specialist](#).

Thank you for your attention and OCS looks forward to continuing to provide high quality services to OCS grantees.

/s/

Seth Hassett

Director, Division of Community Assistance

Office of Community Services