



STATE OF FLORIDA

COMMUNITY SERVICES BLOCK GRANT PROGRAM

(CSBG)

POLICIES AND PROCEDURES MANUAL

DRAFT OCTOBER 2016

Florida Department of Economic Opportunity
Division of Community Development
Office of Housing and Community Development
Community Assistance Section
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100 -- Introduction and Program Information

.01 Program Purpose

The Community Services Block Grant Program (CSBG) is authorized by 42 U.S.C. 9901 et.seq., Subtitle B – Community Services Block Grant Program (the “Act”). The Administration for Children and Families (ACF) within the U.S. Department of Health and Human Services (HHS) administers CSBG at the federal level. Each year, the Florida Department of Economic Opportunity (DEO) drafts and submits its annual Model State Plan setting out its program parameters for review and approval by HHS. The most recent Model State Plan is attached to this manual as **Exhibit 3**.

Through a network of designated local governments and non-profit agencies called Community Action Agencies (CAA's), low-income Floridians are helped to become more self-sufficient; achieve their potential through stronger family and other supportive services; own a stake in their communities, and improve the conditions in which they live.

The CAAs evaluate the local needs of their communities and develop strategies to work in partnership with other community organizations. The program provides a wide variety of services designed at the local level to meet specific community needs. These funds provide emergency financial assistance for education, nutrition, housing, health care, and employment. The funds are also used to provide longer term strategies for the state's poorest citizens and low-income communities to achieve a higher level of self-sufficiency. In assisting people to become self-sufficient, the agency may provide educational assistance such as tuition, books, literacy classes, job readiness preparation, child day care, transportation assistance, job counseling, placement, and training services. For elderly people, the program may assist them to continue to live in their homes by providing meals, food, housekeeper services, rent or mortgage assistance, medicine, and transportation.

There are Six National Goals (National Performance Indicators or NPIs) that are reported on by the CAA's quarterly and annually:

- Low-income residents become more self-sufficient.
- Low-income residents, especially those in vulnerable populations, achieve their potential through stronger family and other supportive services.
- The conditions in which low-income residents live are improved.
- Low-income residents own a stake in their communities.
- Partnerships are achieved among supporters and providers of services to low-income residents.
- Agencies increase their capacity to achieve results.

For individuals to qualify for assistance, the household's income may not be more than 125 percent above the federal poverty level. Applicants must apply for assistance with the local CAA in the county in which they live, and must provide proof of household income.

.02 Purpose of This Manual

The purpose of this manual is to provide information and procedures needed to administer CSBG in Florida. The policies and procedures in this manual relate only to services/benefits funded by CSBG.

.03 Principles

- A. CSBG encourages Agencies to partner and collaborate with other community-based organizations to provide services that meet the needs of low- income households.
- B. Agencies may not exclude Applicants from program participation, deny program benefits, or otherwise discriminate based on race, color, national origin, sex, disability, age, religion, or political belief.
- E. All information provided by an Applicant to an Agency is considered confidential and should be treated as such. The use or disclosure of confidential information about CSBG Applicants is limited to purposes directly connected with administration of the program. Questions on release of information should be referred to DEO.
- F. Right to Request Financial Assistance: All persons have the right to request financial assistance by following the procedures established by the state and the local Agency that provides the services for the area in which they live.
- G. Nondiscrimination - In compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 12250, no individual in Florida shall be excluded from participation in, denied benefits or subjected to discrimination under any program or activity receiving Federal funds, because of Race, Color, National origin, Handicap, Religion, or Sex.
- H. In compliance with the Age Discrimination Act of 1975, no individual shall be denied services or participation or be subjected to discrimination in any of its programs or activities on the basis of age.

.04 Changes in Policy or Procedures

- A. The CSBG Manual will take effect October 1 of each year, corresponding to the beginning of the Agreement period.
- B. Revisions to the CSBG Manual after the effective date will be issued in the form of numbered Information Memoranda by DEO. The transmittal letter will contain instructions for updating the manual as well as a summary of the changes and the effective dates.
- C. As of the next effective date after any revisions to the CSBG Manual, the revisions will become permanent and be incorporated into the full manual. The DEO-issued Information Memoranda will be kept on file for tracking purposes.
- D. Each Agency will be responsible for ensuring CSBG Policy Manuals are issued to individual staff members and are maintained and updated.
- D. Subsequent alerts related to policy changes or clarifications will be added to the policy manuals at the local level by Agencies to ensure that staff has the most up to date information.

.05 Policy Questions and Clarifications

Any Agency requesting clarification regarding procedural detail or policy interpretation will be elevated in the following order to:

- A. The Agency's own internal process for clarification;
- B. A request submitted in writing via email to gerald.durbin@deo.myflorida.com;

Subject: POLICY DEVELOPMENT.

.06 Information Available to the Public

The items which govern CSBG Program Administration in Florida will be maintained in DEO's offices, 107 East Madison Street, Caldwell Building, Tallahassee, Florida 32301, for examination during regular office hours.

- A. Community Services Block Grant (CSBG) State Plan
- B. CSBG Policy Manual
- C. CSBG Core Template Agreement
- D. CSBG Information Memoranda
- E. CSBG Field Monitoring Manual
- F. CSBG Organizational Standards Field Guide
- G. CSBG Community Action Plan Template

Part 200 -- Definitions

A. Act – 42 U.S.C. Chapter 106, the Community Services Block Grant Act as amended and 45 C.F.R. Parts 16, 74 and 96.

B. Administrative Expenses – Those costs that refer to central executive functions that do not directly support a specific project or service. Costs that are incurred for common objectives that benefit multiple programs administered by Recipient. Administrative expenses relate to the general management of the organization, such as strategic direction, board development, Executive Director functions, accounting, budgeting, personnel, procurement, and legal services. (Information Memorandum from the Office of Community Services for the United States Department of Health and Human Services, IM No. 37, issued March 12, 2013).

C. Applicant – A person or persons who has submitted or requested an application for services.

D. Application Date - The date the application is completed (whether by self or with assistance), signed by the Applicant, and verified by Recipient's staff. This date shall not be changed.

E. Application Receipt – The date an Applicant first submits an application for assistance.

F. Community Action Plan – the Community Action Plan as submitted by Recipient according to 42 U.S.C. section 9908(b)(11) of the Act. Recipient shall use the most recent DEO Community Action Plan template.

G. DEO – The State of Florida, Department of Economic Opportunity which is the state CSBG grantee Agency for Florida, designated by HHS to receive funds annually for program purposes. The CSBG program is administered through the Division of Community Development, Bureau of Community Assistance.

H. Eligible Activities – include, but are not limited to, the following:

(1) A range of services and activities having a measurable and potentially major impact on causes of poverty in the community or those areas of the community where poverty is a particularly acute problem;

(2) Activities designed to assist eligible participants with low-income to:

- a. Secure and retain meaningful employment;
- b. Attain an adequate education;
- c. Make better use of available income;
- d. Obtain and maintain adequate housing and a suitable living environment;
- e. Obtain emergency assistance to meet immediate and urgent individual and family needs, including the need for health related assistance;
- f. Remove obstacles and solve problems that block the achievement of self-sufficiency;
- g. Achieve greater participation in the affairs of the community; and

- h. Make more effective use of other programs related to the purposes of the Act.
- (3) Provide, on an emergency basis, for the provision of such supplies and services, nutritious food-stuffs, and related services, as may be necessary to counteract conditions of starvation and malnutrition among individuals with low-income;
- (4) Coordinate and establish linkages between governmental and other social services programs to assure the effective delivery of such services to individuals with low-income;
- (5) Encourage the use of entities in the private sector of the community in efforts to ameliorate poverty in the community; or
- (6) Other activities which may be approved in writing by DEO.
- I. Eligible Entity - any organization, public or nonprofit, officially designated as a community action agency or a community action program under the Federal Legislative provisions of Section 210 of the Economic Opportunity Act of 1964, for fiscal year 1981 or established after 1981 in compliance with federal law to serve areas not served by an existing eligible entity. If such community action agency or community action program lost its designation under Section 210 of such act as a result of a failure to comply with the provisions of said act or who has been determined ineligible, a replacement community action agency will be designated in accordance with provisions of Federal Law.
- J. Eligible Participant - Those individuals whose total gross countable household income from all household members does not exceed 125 percent of the current Office of Management and Budget Poverty Guidelines.
- K. Expenditure – The payment of CSBG funds in the provision of services to eligible households. Allowable expenditures include, but are not limited to, client benefits, administrative costs, program outreach costs, travel, and training.
- L. HHS – The U.S. Department of Health and Human Services, Office of Community Services, Division of Energy Assistance which is the federal funding Agency for CSBG.
- M. Homebound - An individual does not have to be bedridden to be considered confined to their home. However, the condition of these individuals should be such that there exists a normal inability to leave home and consequently, leaving the home would require a considerable and taxing effort. Any absence of the individual from the home attributable to the need to receive health care treatment, including regular absences for the purpose of participating in therapeutic, psychosocial or medical treatment in an adult day-care program that is licensed or certified by the State should not disqualify an individual from being considered confined to their home.
- N. Household - An individual or group of individuals living together as one economic unit.
- O. Local Government or Local Governing Authority - the governing body of a county or municipality.
- P. Local Service Area –The geographic area (county or counties) served by an Agency. Per the LIHEAP Statute, Agencies are required to accept applications for energy benefits at sites that are geographically accessible to all households in the area to be served by the Agency.

- Q. Migrant and seasonal farmworker organization - An organization funded to provide direct services to a target population of migrant and seasonal farmworkers under the CSBG Program and having a Board of Directors composed of at least 51 percent representatives of migrant and seasonal farmworkers.
- R. Nonprofit organization – An organization created according to state law to provide services to benefit the general public.
- S. Obligation – The commitment of funds for a specific use, or a promise to spend the funds. Agencies should define at what point a commitment becomes an obligation in their Fiscal Policies and Procedures Manual.
- T. Population - Total number of residents for each county, excluding inmates of institutions, as extrapolated from the latest official State estimate of population by the University of Florida Bureau of Economic Research and Development. For limited purpose agencies as designated under title II of the Economic Opportunity Act of 1964 for fiscal year 1981 which served the general purposes of a community action agency under title II of such Act, “population” means the total estimated number of residents for each county or service area meeting the definition of that limited program.
- U. Poverty Income Guidelines –The federal poverty guidelines established by the U.S. Department of Health and Human Services and published annually in the Federal Register.
- V. Program Expense - Program costs that can be specifically identified with delivery of a particular project, service, or activity undertaken by Recipient to achieve an outcome intended by the funding program. Program Expenses can include expenditures on some activities with administrative qualities, including salaries and benefits of program staff and managers, equipment, training, conferences, travel, and contracts that expressly relate to the delivery of an individual program or service funded by a specific grant source. (Information Memorandum from the Office of Community Services for the United States Department of Health and Human Services, IM No. 37, Issued March 12, 2013).
- W. Secondary Administrative Expense - an Administrative Expense to support Eligible Activities as defined, for which program activities are directly funded or governed by a source other than CSBG.
- X. Subgrant Agreement – The written contract between DEO and an Agency (or Recipient), which sets forth the services to be provided with the subgrant funds.

Part 300 -- Legal Base

FEDERAL REGULATIONS	STATE REGULATIONS	CSBG AWARD AGREEMENT
<ul style="list-style-type: none">• U.S. Department of Health and Human Services• 42 U.S.C. ss 9901 et.seq.	<ul style="list-style-type: none">• 409.508, Florida Statutes	<ul style="list-style-type: none">• Subrecipient Agreement between DEO and the CSBG Agency

A. HHS provides the funding for CSBG. State funds are not used in the program. Funding levels available vary each program year.

- B.
- Federal Laws:
 - Community Services Block Grant Act, Title VI, Subtitle B, of the Omnibus Budget Reconciliation Act of 1981 (Public Law 97-35)
 - CFR Title 45, Part 96, Subparts A-F
 - State Statutes/Rules:
 - Chapter 20.60, F.S.

C. Federal and/or state laws take precedence over any policy in this manual.

D. CSBG Agencies may not be more restrictive than the law.

Part 400 -- Program Administration and Requirements

.01 General Requirements

- A. All Agencies, by signing the annual CSBG Agreement with DEO, agree to provide services in compliance with the rules and regulations stated within the Agreement.
- B. The most recent CSBG Agreement is attached to this manual for reference at **Exhibit 4**.
- C. Agencies are allowed up to 15% for Administrative costs. The remaining 85% of an Agency's allocation may be divided among one or more categories including Program Costs, Direct Client Assistance Costs, Subcontractor Admin and Program Costs, and Secondary Administrative Costs.
- D. Administrative and Program funds should not be spent at a faster rate than Direct Client Assistance funds. During an on-site review or during the closeout desk review, any agencies that return funds, especially Direct Client Assistance funds, without proportional amounts of administration and outreach funds will be cited with a Finding in the current or a future monitoring report.
- E. DEO staff are responsible for the overall administration of the program, including developing program policies, rules and procedures, coordinating the program's operation, monitoring and providing training and technical assistance.
- F. Each Agency is responsible for providing staff to operate CSBG in their designated Local Service Area to potential Applicants.

.02 Advances

- A. If an agency receives an advance, advance expenditure tracking is based on 100 percent (100%) of three months of reported expenditures.
- B. DEO Staff will calculate and track the following:
 - 1. Total Amount of Advance
 - 2. 100% of the Amount of Advance
 - 3. Expenditures per month as reported on the FSR
 - 4. Calculation of three months' worth of expenditures
 - 5. Calculation of three months' worth of expenditures less 100% of the Advance
- C. The calculation of three months' worth of expenditures is a rolling target, i.e., October, November, & December; November, December, & January; etc., until the Agency has received all available reimbursement and starts expending their advance only. This should occur no later than the beginning of the 4th quarter of the agreement.
- D. If the calculation of three months' worth of expenditures less the 100% of the Advance is positive, the agency's expenditures have exceeded 100% of the advance amount. The full amount

requested on the FSR may be reimbursed (unless there are other issues to clarify prior to submitting the FSR for reimbursement).

E. If the calculation of three months' worth of expenditures less the 100% of the Advance is negative, the agency's expenditures have NOT exceeded 100% of the advance amount, and full reimbursement cannot be made.

G. If the agency does not expend a minimum of 100% of the Advance amount in any three consecutive months, the pending reimbursement request will be reduced by the difference between 100% of the advance amount and the sum of the three month expenditure total. This can happen more than once during an Agreement period.

H. In the event the amount of the advance is reduced, DEO staff will recalculate the advance amount based on the reduced amount.

.03 Eligible Entity Designation Process

If any geographic area of the state is not, or ceases to be served by a CSBG eligible entity, DEO shall solicit applications and designate a CSBG eligible entity using the following procedure:

PHASE ONE

DEO will notify all Community Services Block Grant (CSBG) eligible entities, county commissions within the unserved counties, and other interested parties. The notice will announce the date for a public informational meeting to be held in the unserved county(ies) to inform potential entities of the requirements of the CSBG program and to provide information concerning the qualification process and timeline. This announcement will be published in the Florida Administrative Register, local newspaper(s) in circulation in the unserved areas, and sent to other interested parties. This notice will also:

A. Inquire if there are any existing private nonprofit CSBG eligible entities or private nonprofit organizations geographically located in the unserved county, or an area contiguous to or within reasonable proximity of the unserved area, who is interested in providing CSBG services to the unserved county(ies).

B. State that in order to be designated to serve as the eligible entity for the unserved area, an entity must agree to add additional members to their board to ensure adequate representation in compliance with 42 U.S.C. 9901 and Sec. 676A and 676B.

C. Encourage existing CSBG eligible entities to work together with social service providers and local governments in the unserved county(ies) to determine the best service provider based on these guidelines and 42 U.S.C. 9901, Sec. 676A.

D. State that special consideration shall be given to an organization with demonstrated effectiveness in providing a broad range of services designed to eliminate poverty and foster self-sufficiency. Priority shall be given to existing CSBG eligible entities in good standing with DEO that are providing related services in the unserved area or in areas contiguous to or within reasonable proximity of the unserved area.

E. Provide information on submitting a Letter of Interest and obtaining a Request for Qualifications package.

F. Announce the due date of the Request for Qualifications package.

G. Announce the anticipated annual CSBG award amount for each unserved county

Within 30 days of the date of the public announcement:

DEO will conduct a public informational meeting in the unserved county(ies). The county commission in the unserved county(ies) may elect to hold this informational meeting on behalf of DEO or notify DEO that it chooses to not hold the meeting, in which case DEO will conduct the meeting.

After the public informational meeting is held, a second public announcement will be published in the Florida Administrative Register, local newspaper(s) in circulation in the unserved areas, and sent to other interested parties. The announcement will provide proposal instructions and deadlines for filing a Letter of Interest. Interested entities who wish to be considered will mail to DEO and to the unserved county's commission chairperson:

- A Letter of Interest signed by the chief executive officer of the private nonprofit CSBG eligible entities or private nonprofit organizations stating their interest in becoming the CSBG service provider in the unserved county(ies); and
- A resolution from the board of directors or governing board stating their willingness to serve the unserved county(ies), and to amend their CSBG board bylaws, structure and membership, and, for non-profits, Articles of Incorporation to comply with 42 U.S.C. 9901, Sec. 676A and 676B.

The Letter of Interest will announce the interested entities' intent to apply to be the designated service provider. Upon receipt of the Letter of Interest, DEO will mail the Request for Qualifications package to the interested entity.

PHASE TWO

Within 60 days of the due date of the Letter of Interest (or 60 days from the date of the last Letter of Interest received):

A second publicly noticed hearing on the selection of a proposed service provider will be held by the county government or DEO for the unserved area. At least two weeks prior to the date of the hearing, it must be noticed in the local newspaper, in the Florida Administrative Register, and provided to all known interested parties including all existing CSBG eligible entities with service areas contiguous to or in reasonable proximity to the unserved county. In addition, other social service agencies providing assistance in the unserved county must be notified by mail. The notice must list the names of all agencies that provided a Letter of Interest to the county commission and DEO as required in Phase One, and submitted a completed Request for Qualifications package per the instructions listed in the second public notice. The applicants must be given an opportunity to present their qualifications to the board of county commissioners and DEO at the public hearing. If the county chooses to hold the hearing, this hearing may be part of a regularly scheduled commission meeting or at a specially scheduled meeting.

The public hearing must take place before the commission makes its decision and recommendation to DEO. If for any reason the county commission declines to conduct this public hearing, DEO will conduct the public hearing using the above criteria in the unserved county(ies). The commission may ask for, and DEO may grant, a time extension not to exceed an additional 60 days from the date of the request.

Once the hearing has concluded, if the county commission held the meeting on behalf of DEO, the county may submit to DEO a letter from the chief executive officer of the unserved county reporting the outcome of the public hearing and stating the county commission's recommendation. If DEO holds the hearing, DEO will consider comments made at the hearing, along with the submitted Request for Qualifications packages. A DEO committee will score the applications and submit their final decision to DEO's Executive Director for consideration.

PHASE THREE (If applicable)

If under Phase Two, no existing private nonprofit CSBG eligible entities or private nonprofit organizations are identified or determined to be qualified to serve the unserved area as an eligible entity, DEO will notify all CSBG eligible entities, unserved counties and interested parties of the outcome. This notice will inquire if there are any political subdivisions of the State that:

- are geographically located in the unserved area;
- are capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency;
- meet the requirement of 42 U.S.C. 9901, Sec. 676A, and are interested in becoming the eligible entity to serve the area.

The notice will encourage local governments to work together with existing eligible entities and private nonprofit organizations to determine the best service provider based on these guidelines and 42 U.S.C. 9901, Sec. 676A. Special consideration shall be given to local governments with demonstrated effectiveness in providing services consistent with the goals and purposes of CSBG in the unserved area. In order to serve as the eligible entity for the unserved area, the political subdivision must meet the requirements of 42 U.S.C. 9901, Sec. 676 A and 676B and establish a system to serve CSBG eligible people in the unserved county(ies).

Within 60 days of the date of the Phase Three notice:

The local government will mail to DEO a resolution (Letter of Interest) from the county or city commission stating their interest in becoming a CSBG eligible entity to provide CSBG services in the unserved county(ies), and their willingness to develop a CSBG board that meets the requirements of 42 U.S.C. 9901, Sec. 676A and 676B.

Within 60 days of the date of the local government's Letter of Interest:

The local government must complete all the requirements given in Phase Two above.

PHASE FOUR

After the final selection of a new provider agency by DEO, and after all required documents are reviewed and approved by DEO, a formal request will be made to the Governor that he designate them the CSBG eligible entity for the unserved county.

EXTENSIONS

During any phase of this process, DEO may, at the request of an applicant entity, extend the time period allowed for the submission of documents. The extension shall be no longer than 90 days.

CONTRACTING

After designation by the Governor, but prior to DEO contracting with the designated eligible entity to provide CSBG services in the unserved area, the entity must deliver to DEO the following:

- A. evidence that the entity has enacted all applicable bylaws;
- B. a roster of board members specifying the sector and, where applicable, the geographic area they represent;
- C. board minutes documenting that all new board members have been seated; and
- D. an acceptable community action plan meeting the requirements of 42 U.S.C. 9901, Sec. 676(b)(11), including a community-needs assessment of the unserved area.

.04 De-Designation, Termination or Reduction of Funding

This section describes DEO's plan for complying with the requirements of Section 678C of the Act. Section 678C of the Act requires states to comply with certain requirements in the event that the State determines that an eligible entity (Grantee) fails to comply with the terms of an agreement or the State plan, to provide services under the community services block grant program or to meet appropriate standards, goals, and other requirements established by the State, including performance objectives.

- 1. DEO will activate a Corrective Action Team (CAT) that will consist of appropriate staff with expertise in the problem areas.
- 2. DEO provides written notification to the Grantee, including the board chair, that the CAT will be on-site within a specified time (depending upon the urgency) to review relevant documents and actions pertaining to the problems.
- 3. CAT arrives on-site and conducts a preliminary review of any findings or concerns.

4. If the results of the review are perceived to be a matter of urgency such as fraud or misuse of funds, CAT will immediately notify the CSBG planning manager and issue recommendations.

(a) The Planning Manager will review recommendations with upper management and issue written approval of the team's recommendations.

(b) CAT will call an emergency meeting of the Grantee's board of directors to inform them of the findings and the corrective actions required.

(c) If fraud and misuse of funds have occurred, independent auditors along with CAT will conduct a thorough review of the situation within 45 days.

(d) If fraud and misuse can be corrected via removal of appropriate personnel and replacement of funds, and the Grantee takes immediate action to correct this, then the grantee will be placed on probation for one year.

(e) The Grantee will develop a corrective action plan and submit the plan to DEO for review.

(f) The Grantee must provide monthly reports on its progress to resolve the deficiencies.

(1) After one year, if the Grantee has complied with all corrective actions, and no other major problems occur, DEO will remove the Grantee from probationary status.

(2) If after one year's probation, the Grantee is still not in compliance, DEO, in coordination with the Federal Department of Health and Human Services (HHS), will move to terminate funding.

(g) If misuse and fraud cannot be corrected by removal of appropriate staff and funds replaced, then DEO, in coordination with HHS, will move toward terminating funding.

5. If the results of the review are not of an urgent nature, then CAT will return to the office and within 15 working days, issue a report on the problem, along with recommendations for resolution.

(a) The DEO Planning Manager will review the report with upper management and issue approval of the team's recommendations within ten working days.

(b) After approval, DEO will send a certified letter outlining the team's findings and the corrective actions required to the Grantee.

(c) The Grantee must respond to the certified letter within 15 days from the postmarked date of receipt.

(d) Upon receipt of the Grantee's response, CAT will review the response for compliance.

(e) If the response is in compliance, then DEO will conduct a follow-up on-site review to verify compliance within a specified time.

(f) If the response is not in compliance, CAT will submit the Grantee's response along with further recommendations to the Planning Manager for review with upper management.

(g) After approval of the team's recommendations, DEO will send a certified letter of probation to the Grantee. This letter will inform the Grantee that DEO will start the de-funding process if the Grantee is not in compliance within 180 days.

If after a period of 180 days, the grantee is still not in compliance, DEO will begin the termination process.

PART 500 – Board Requirements

A. In accordance with the requirements of 42 U.S.C. 9910(a), an Eligible Entity receiving CSBG funds pursuant to this Agreement shall establish a board in accordance with the following:

(1) For a private non-profit entity:

a. one-third of the members of the board are elected public officials, holding office on the date of selection, or their representatives. Letters reaffirming the delegation, signed by the elected officials, shall be required each year regardless of the number of years the terms run. Agencies providing services in multi-county areas are required to submit to DEO a plan to ensure representation of every county served. When an entity expands to include a new county into its service area, the new county must be represented on the board by an elected public official currently holding office, or their representative for the first two years.

b. Not fewer than one-third of the members are persons chosen in accordance with democratic selection procedures adequate to assure that they are representatives of individuals and families with low-income in the area served. Each member selected to represent a specific neighborhood within a community must reside in the neighborhood represented by the member.

c. The remainder of the members are officials or members of business, industry, labor, religious, welfare, education, or other major groups and interests in the community served. Interest groups are organizations with nonprofit status, incorporated and registered with the office of the Florida Secretary of State.

(2) For Public Organizations:

a. A tripartite board, 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;

i. are representative of low-income individuals and families in the neighborhood served;

ii. reside in the neighborhood served; and

iii. are able to participate actively in the development, planning, implementation, and evaluation of programs funded under this Agreement; or

b. 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 chapter. Public agencies receiving less than \$100,000 in their initial grant award are able to choose to have a full tripartite board or another mechanism proposed by the public entity and approved by the state CSBG office. The proposed alternative board structure must ensure decision making and

participation by low-income individuals in the development, planning, implementation and evaluation of CSBG-funded activities.

B. The Agency must demonstrate that the CSBG program is administered through a tripartite board that meets the requirements of 42 U.S.C. 9910(a) or (b) by maintaining documentation including, but not limited to, the following:

- (1) Board member application, resume, letter of intent to serve, background check or due diligence documentation;
- (2) Minutes of the member's seating;
- (3) Appointment letter;
- (4) Yearly reaffirmation letters (for public sector members);
- (5) Vacancy declaration;
- (6) Resignation letter or notification of term end;
- (7) Election selection documentation (for low-income sector members); and
- (8) Excused/unexcused absence documentation.

C. The board of directors will fully participate in the development, planning, implementation, and evaluation of the CSBG program to serve communities and individuals with low-income. Full participation includes, but is not limited to, regular attendance at board meetings, participation on board committees, knowledge of the organization's mission and goals, and fiduciary duties.

- (1) Regular attendance is defined as at least seventy percent of the seated members attending at least two-thirds of the regularly scheduled board meetings each year as designated in Recipient's bylaws or governing documents.

D. The Agency's bylaws or governing documents shall include a procedure which will allow individuals with low-income, community organizations, and religious organizations to petition for adequate representation on the board if they feel inadequately represented.

E. All board of directors meetings and board committee meetings subject to Florida's Government in the Sunshine Law (section 286.011, F.S.), as stated in Paragraph (20)(k) of this Agreement, shall be publicly noticed at least seven calendar days but not more than thirty calendar days prior to the date on which the meeting is scheduled. Such notices must be given by publishing meeting information by methods acceptable under the Florida Sunshine Law. If immediate danger to the public health, safety or welfare occurs requiring emergency action by the board, a board meeting may be scheduled by any procedure that is fair under the circumstances and necessary to protect the public interest.

F. Board vacancies should be filled within 90 days of the vacancy occurring. The Agency's bylaws or governing documents shall include a policy on filling board vacancies as they occur.

Part 600 -- On-Site Monitoring

.01 Introduction

Monitoring is the process by which DEO periodically reviews the implementation of and compliance with regulations, policies and procedures as set forth in the CSBG Federal Statute, this Policy Manual, the Agreement between DEO and local provider agencies, and other policy transmittals issued by DEO.

The purpose of monitoring is:

- To assure implementation and adherence to regulations, policies and procedures as promulgated by DEO.
- To fulfill the requirement of the Federal Block Grant for the Community Services Block Grant Program for a regular review of all eligible entities' program operations.
- To protect Applicant's rights and insure good public service.
- To identify potential programmatic or procedural issues that may require revised policies.
- To prevent future audit issues.

This monitoring plan will effectively:

- Examine and test what is actually happening in the administration of CSBG;
- Review the program implementation and determine what should have or did not happen; and
- Identify findings and concerns that need corrective actions to address going forward.

These monitoring visits are an opportunity to help local agency staff assess program operation procedures. Sometimes these visits lead to program clarification of operation procedures. During the year of the visit, changes in procedure replace the old ones by means of special additions to the Policy Manual called "Information Memorandum".

Both state and federal staff monitor the agencies' compliance with the CSBG Program. The Agency will allow DEO to carry out monitoring, evaluation and technical assistance. The Agency will ensure the cooperation of its employees and of any subcontractors with whom they contract to carry out program activities. Training and technical assistance will be provided by DEO within limits of staff time and budget, upon requests by the grantee and/or upon determination by DEO of need.

.02 The DEO CSBG Program Monitoring Field Manual is incorporated by reference into the Agency's yearly agreement and is attached to this policy manual as **Exhibit 5**.

.03 HHS requires the state to conduct an on-site monitoring once every 3 years. DEO attempts to visit each Agency every 2 years. This may be adjusted if a situation arises, i.e., all new staff or new agency leadership, high risk assessment score, changes to program management that are evident in reporting, etc.

.04 Procedures

A. A DEO Grant Manager will contact the Agency's director or program manager to schedule the dates for an on-site visit. It is the responsibility of the Agency to inform other pertinent agency personnel of the visit.

B. A letter confirming the date and purpose of the visit is sent along with a copy of the monitoring manual. Part 1 of the manual will be completed by DEO staff indicating which grant years will be reviewed, and which months have been chosen for the fiscal and personnel review.

C. At each on-site monitoring visit, DEO staff will review files and expenditures for the past 2 years, possibly including the current grant year.

D. The visit will consist of an initial entrance meeting with the Agency's director and appropriate staff explaining the purpose of the visit and what can be expected.

E. DEO staff will conduct the specific monitoring interview and review records randomly selected as appropriate. A sample of client files, administrative records and fiscal reports are reviewed.

(1) If the Agency serves one county through only one office, the Agency shall select and have available when DEO staff arrives, 30 random CSBG Client Files (15 Emergency/One Time Services and 15 FSSP).

(2) If the Agency serves one county through multiple outreach locations, the Agency shall select and have available at the main office when DEO staff arrives, 10 CSBG Client Files (5 Emergency/One Time Services and 5 FSSP) from EACH outreach location.

(3) If the Agency serves multiple counties through one or more outreach locations in each county, the Agency shall select and have available at the main office when DEO staff arrives, 10 CSBG Client Files (5 Emergency/One Time Services and 5 FSSP) from EACH county and outreach location.

(4) For the months chosen for review by DEO Staff for fiscal and administrative records, the Agency shall have pulled and available for review when DEO staff arrives, all backup documentation pertaining to the months chosen. This includes all fiscal backup for all charges reported on the selected Financial Status Report, all payroll from salaries reported on the selected Financial Status Report, and any travel records for travel expenses reported on the selected Financial Status Report.

(5) For the on-site review, the Agency shall have pulled and available for review when DEO staff arrives, all supporting documentation pertaining to the Organizational Standards.

(6) For the on-site review, the Agency shall have pulled and available for review when DEO staff arrives, all board member files for all active board members. The Agency should also be able to pull any files for board members who have recently vacated a position on the board.

(7) For the on-site review, the Agency shall have pulled and available for review when DEO staff arrives, all board meeting packages, including public notices, supporting documentation, and reports and materials shared with board members. F. After completion of the interview and record review the monitoring staff shall conduct an exit conference with the Agency director and other pertinent staff. It is recommended that the agency director be present at the exit conference. During the exit conference the monitoring staff will identify findings and suggest strategies for corrective action if problems are found.

F. After completion of the monitoring, DEO staff shall conduct an exit conference with the Agency director and other pertinent staff. It is recommended that the Agency director be present at the exit conference. During the exit conference the monitoring staff will identify findings and suggest strategies for corrective action if problems are found.

G. DEO will send the full monitoring report, including either the Technical Assistance Plan or Quality Improvement Plan, within 45 days of the site visit summarizing the visit findings and suggesting corrective actions the Agency must do to correct any findings that did not meet standards or requirements. If the findings warrant, a written corrective action plan will be requested of the Agency. Additional follow-up may be required to assure implementation of the corrective action plan.

H. Agencies shall have 35 days in which to review the report and submit a response with required corrective actions and further documentation of compliance, if required by the report.

I. DEO staff will work with the Agency should not all findings or concerns be cleared. Additional training and technical assistance may be offered, and/or an additional on-site review may be conducted.

.05 Other Reviews and Audits

Periodically, CSBG and/or your agency as a CSBG provider, are subject to audits or program reviews by other organizations. This section summarizes those reviews. All agencies are to cooperate fully with these reviews or audits.

A. Single Audit

The Single Audit reviews fiscal and program compliance of all Federal programs. The Agency is responsible for understanding its responsibilities for the Single Audit and to engage an auditor each year to complete this review. More specific requirements may be found in the Agency's DEO Agreement, Exhibit 1.

B. Federal Program Compliance Review

Approximately once every ten years the U.S. Department of Health and Human Services, Office of Community Services, Division of State Assistance conducts a Program Compliance review. HHS selects a sample of agencies for review.

.06 Organizational Standards

A. Background

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.

In 2012, HHS 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. In March, 2014, HHS published a draft information memorandum with the draft organizational standards. The final result of the COE and HHS efforts is a comprehensive set of organizational standards developed by the CSBG Network for the CSBG Network. Information Memorandum (IM) 138 was published January 26, 2015, disseminating the final Organizational Standards across all CAA’s. Compliance is required beginning October 1, 2015 (FFY 2016).

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

DEO has adopted the COE-developed Standards and Tools for assessment of the Standards. The full text of the Standards, plus agency self-assessment tools, industry-accepted definitions and examples of

acceptable documentation are included as attachments to the Field Guide Manual, which is included with this Manual as **Exhibit 8**.

B. Florida's Assessment Plan for the Organizational Standards

(1) General Information

Per IM-138, State CSBG Offices are to assess each eligible entity annually on the Organizational Standards as set forth in the State's policy and regulations. DEO will conduct a full review of all documents in the first year (FY2016). Each CAA will submit the completed Field Guide and all supporting documentation, i.e., risk assessments, board minutes, bylaws, needs assessments, strategic plans, etc. Each subsequent year will require agencies to submit the completed Field Guide along with their Annual Report (currently the IS Survey). For any Standard Not Met in either the first year or any subsequent year, the following year will require submission of the documentation to cure.

(2) Annual Assessment Plan

YEAR 1 – FFY2016

Full Desk Assessment by DEO

- Agencies will submit:
 - o Community Action Plan
 - o Community Needs Assessment
 - o Organizational Standards Field Guide
 - o All supporting documents indicating compliance with Standards
- Due by February 1, 2016 (tentative)
- DEO will do full assessment and review
- By April 1, 2016, issue Technical Assistance Plan (TAP) to any agency not meeting 100% of the Standards
- No Quality Improvement Plans will be issued on any Organizational Standard for this first year only (FY2016).

YEAR 2 and Beyond

Partial Desk Assessment by DEO and Full On-Site Assessment for any agency monitored during the year

- Agencies will submit annually by November 15:
 - Community Action Plan
 - Organizational Standards Field Guide
 - Supporting documents for any Standard NOT MET during the previous fiscal

- year
- DEO will do a desk review and issue one of the following reports annually by February 1:

- TAP for any Standard NOT MET for the first time
- Quality Improvement Plan (QIP) for any agency who did not correct a Standard NOT MET during any previous fiscal year
- During on-site reviews, DEO staff will review the full supporting documentation for all Standards and issue the appropriate report following the on-site review as stated above

(3) Issuance of Reports and Follow-Up

After DEO staff review of each agency's completed Field Guide and supporting documentation, DEO will determine if the Standard has been MET or NOT MET according to the guidelines stated in this policy. These reports are in addition to any standard monitoring reports the agencies will receive after an on-site monitoring review. Findings and Concerns from the on-site monitoring will be noted. The TAP and/or QIP reports will be attached as addendums to the monitoring report and must be addressed by the agency in their response.

Technical Assistance Plan (TAP)

- Issued for the first-time a Standard is NOT MET, or if a Standard was NOT MET during a review period, but corrected and MET for the subsequent 5 years.
- The TAP will outline the actions the agency must take, as well as the time-frame for correction.
- Each agency shall have at least until the next review period to correct any Standards NOT MET in a TAP.

Quality Improvement Plan (QIP)

- If appropriate in certain situations, DEO 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.
- Issued for any repeat Standard NOT MET.
- The QIP will outline the actions the agency must take, as well as the time-frame for correction and any benchmarks to be achieved.
- The time-frame allowed for correction will depend on which Standard(s) is/are NOT MET and may vary depending on the agency, i.e., county agencies may have additional time because of approvals needed from the board of county commissioners.
- As long as DEO is confident that the Agency is moving toward meeting the Standards, DEO will not initiate action to terminate or reduce funding.

.07 Risk Assessments

A. Per Federal Statute 75.352, all pass-through entities must evaluate each sub-recipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the sub-award for purposes of determining the appropriate sub-recipient monitoring.

B. DEO's template and plan for conducting a risk assessment may be found at **Exhibit 7** to this manual.

C. The risk assessment shall be completed annually during the review of the annual Subgrant Agreement, prior to DEO awarding funds to any Agency.

D. Depending on the outcome of the risk assessment, DEO may adjust its monitoring schedule and plan to provide more in-depth review and training and technical assistance to an Agency.

(1) An Agency with a HIGH Risk Assessment score may be monitored within one year after DEO completes the risk assessment. In addition, after further consultation with the Agency, DEO may attach Special Conditions to the Agreement that the Agency must meet in order to continue receiving funding.

(2) An Agency with a MEDIUM or LOW Risk Assessment score, monitoring will be conducted on the regular schedule as set forth by DEO.

Part 600 – Coordination with Other Local Service Providers

Agencies must inform potentially eligible applicants in their service area about the program to ensure that Applicants wishing to apply will have the opportunity.

- A. Agencies must inform all local agencies that are in regular contact with the low-income population, especially agencies and groups serving people who are elderly, disabled, home bound, migrants or seasonal farm workers.
- B. Agency staff is also encouraged to participate in local television and public interest radio programs and to place announcements of the program in media community calendars. A description of all interaction between the Agency and the media concerning CSBG must be kept in the Agency office. It should be forwarded to DEO, if requested.
- C. If the Agency is unable to assist a homebound Applicant by phone, the Agency must make a home visit to the prospective Applicant to assist them in completing the application.
- D. Upon the request of an official of a local congregational center serving elderly or disabled people, Agency staff will visit and provide information or make presentations on the program. A description of the interaction must be included in the Agency's outreach report.
- E. Each Agency determines the address and telephone number of each county extension office within the service area. The Agency must furnish this information to all persons who request information about energy conservation and to all organizations that provide outreach activities.

Part 700 -- Program Benefits

The CAAs evaluate the local needs of their communities and develop strategies to work in partnership with other community organizations. The program provides a wide variety of services designed at the local level to meet specific community needs. These funds provide emergency financial assistance for education, nutrition, housing, health care, and employment. The funds are also used to provide longer term strategies for the state's poorest citizens and low-income communities to achieve a higher level of self-sufficiency. In assisting people to become self-sufficient, the agency may provide educational assistance such as tuition, books, literacy classes, job readiness preparation, child day care, transportation assistance, job counseling, placement, and training services. For elderly people, the program may assist them to continue to live in their homes by providing meals, food, housekeeper services, rent or mortgage assistance, medicine, and transportation.

.01 Allowable Expenditures

Eligible activities may include, but are not limited to, the following:

- (a) Supporting activities that are designed to assist families and individuals with low income, including families and individuals receiving assistance under Part A of Title IV of the Social Security Act (42 U.S.C. § 601, et seq.), homeless families and individuals, migrant and seasonal farm workers, and elderly individuals and families with low income;
- (b) Addressing the needs of youth in communities with low income through youth development programs that support the primary role of the family; and
- (c) Making effective use of and coordinating with other programs.

.02 Unallowable Expenditures

Per the CSBG Act, CSBG funds may not be expended on the following activities:

- (a) Lobbying or other political activities; and
- (b) The purchase or improvement of land, or the purchase, construction, or permanent improvement of any building or other facility.

.03 Group Events

For services with limited in-take procedures (where individual income verification is not possible or practical), the CAA should contact the state for specific permission to use one of the following processes:

- (a) a truncated self-verification process, or
- (b) certify to DEO that the event is being held in a predominantly low-income area and is targeted to low-income residents.

Part 800 -- Application Intake and Processing

.01 Application Period.

Applications may not be taken after all funds are obligated or the Agency's contract ends. Each Agency must evaluate the needs in their service area and budget funds in a manner to best meet these needs, and that is in accordance with their Community Needs Assessment, Workplan and Strategic Plan. If CSBG funds are not available, the Agency should refer the individual to other service providers in the area.

A. An Agency with benefit funds will accept an application when the Applicant has signed, dated, and delivered it to the office in the county where they live.

B. If submitted by mail, the Agency must receive the application at the local Agency office designated to accept applications before the end of the application period.

.02 CSBG Application Form

A. DEO does not prescribe a specific CSBG Application Template. Each Agency may develop its own CSBG application, but it must include, at a minimum, the following information:

- (1) Date of application
- (2) Client's name, address, sex, race, age;
- (3) HH member names, address, sex, race, age, ID documentation
- (4) Income of all HH members declared
- (5) Income documentation for all household members
- (6) Self-declaration of income, as needed
- (7) Statement of how living expenses are being met, if applicable
- (8) Signatures of applicant, case worker, supervisor staff

B. Applicants must use the Agency's most current CSBG application form.

C. Applications received in another form, such as a letter expressing intent to apply, will not be considered an application for CSBG. Agencies must reply to this type of correspondence with information on how to apply.

.03 Application Assistance

Agencies must provide assistance at each accepting location to Applicants who request help. If the Agency is unable to assist a home bound Applicant by telephone, the Agency will make a home visits to do so.

.04 Application Locations

Each Agency must designate specific locations to accept applications.

- A. Applications will be accepted only at locations designated by the Agency.
- B. Service organizations, if approved by the Agency, may receive applications. However, these offices must forward the applications to a designated Agency office while funds remain available.

.05 Accepting Applications

- A. Agencies will accept an application if it:
 - (1) Is a valid application form,
 - (2) Is received within the application period,
 - (3) Contains at least the Applicant's original signature and the signature date. The spouse's signature is not required.
- B. When the application form is acceptable, the form must be date-stamped with the date it was received at the accepting location. The date stamped on the application is the official date of Application Receipt and cannot be changed.
- C. An application will not be accepted if it is not signed and dated.
 - (1) An unsigned or undated application must be returned to the Applicant with a letter explaining why it could not be accepted and that it will be accepted if it is corrected and returned while funds are available.
 - (2) An Agency may call the Applicant and hold the unsigned and/or undated application for the Applicant to complete if the Applicant requests it.
 - (3) Staff may date an application if requested by the Applicant.
- D. Any application received after funds are all obligated must be returned to the household with a Notice of Denial and Appeal. Copies of the application form and the notice should be kept on file. The notice may be given to the Applicant in person or it may be mailed.
- E. When the Applicant submits a signed and dated application, it should be reviewed immediately for completeness. If any questions are unanswered or incomplete, the Agency should have the Applicant provide the missing information. If the Applicant is unable to complete the form at that time the Agency should inform the Applicant that the application cannot be processed until all required information is received and verified. The Agency must provide a deadline in writing to the Applicant for completion and re-submission of their application. The Agency must act with Reasonable Promptness, meaning it has 15 days from the date of Application Receipt to make a decision (approve or deny).
- F. Agency staff should obtain as much information and verification as possible while the Applicant is in the office.

G. If an application is received from a county outside of the Agency's service area, then it should be returned to the Applicant stating why it cannot be accepted and where the Applicant should apply.

.06 Reapplication

A. An Applicant can reapply for CSBG anytime if the Agency denied their first application and benefit funds remain available.

B. If an Applicant applies and then files a second application while the first application remains pending, the Agency must determine eligibility based on the first application.

(1) If the household is eligible based on the first application, the second application is not considered. The second application is marked "DUPLICATE" and filed in the case record.

(2) If the household is denied services based on the first application, the second application must be considered and eligibility determined.

.07 Duplicate Applications

When an Applicant or a household member files more than one application, the Agency must check for duplication.

A. When the Agency discovers possible duplication, the following procedures should be followed:

(1) Rule out the possibility of an error in recording the social security number.

(2) Find the duplicate case(s).

(3) Compare Information from Client files.

(4) If the case records do not contain sufficient information to decide duplication, check other Agency records, and

.08 Application Tracking

The Agency must establish and maintain an electronic tracking system of all valid CSBG applications. The Agency should be able to collect and report out on the following information, including but not limited to:

A. Full Name

B. Street Address with Zip Code

C. Date of Application

D. Household Size

E. Social Security Numbers of all household members

F. Number of Disabled, elderly and children 5 years of age and under in the household

- G. Ages of children 5 and under in the household
- H. Type of Assistance Provided and Amounts
- I. Intake/Case Worker
- J. Service Area Location
- K. Total Calculated Gross Annual Income and Poverty Level

.09 Maintaining Records

A. Agencies must retain records of the program, including case records as well as supporting evidence of eligibility and all payment information according to the record retention requirements outlined in the CSBG Agreement between DEO and the Agency.

B. Agencies must retain all financial records, supporting documents, statistical records, and any other documents pertinent to their Agreement for a period of five (5) years after termination of the Agreement. If an audit has been initiated and if the audit findings have not been resolved at the end of five years, the documents must be retained until the audit findings have been resolved.

.10 Payment Errors and Overpayments

A. Agencies must practice fiduciary responsibility to ensure grant funds used solely for allowable expenditures, and establish a system to detect applications from the same address and social security number. It is the intent of DEO that:

- (1) Individuals applying for CSBG will receive the correct benefit amount and/or information to other resources available,
- (2) Fraud and favoritism and the appearance of fraud and favoritism be eliminated, and
- (3) The administration of the program is efficient and cost effective.

B. Best Practices for Preventing Errors

- (1) The Agency should clear up any discrepancies prior to awarding a benefit to a household.
- (2) The Agency must employ due diligence and not put all the burden on the applicant.
- (3) The Agency must require that the Applicant complete and sign the CSBG application form to establish eligibility and to decide a benefit amount.
- (4) A CSBG supervisor or edit staff should review all applications for applicants claiming zero income.

.11 Overpayment and Recoupment

The agency must have a written policy that describes action to be taken when CSBG benefits provided cannot be used for their intended purpose, i.e., tuition payments for an applicant who is no longer enrolled. The policy must state that the funds will be returned to the agency.

A. Overpayment means money not entitled to and received by the Applicant. An error by the Applicant or Agency can cause overpayment. Despite the reason or the source of the error, the Agency must try to recover all identified overpayments. Federal reviewers, auditors, Agency staff, the Department, the household, or the state auditor general's office can identify overpayment.

B. Overpayments can be caused by:

- (1) Errors on the part of staff reviewing the application
- (2) Errors made by the applicants (omissions, misunderstandings)
- (3) Misrepresentation by applicants in order to commit fraud
- (4) Federal reviewers, auditors, agency staff, DEO, vendors, and even applicants can identify overpayments or incorrectly applied benefits

C. Procedures for recoupment of overpayment:

- (1) Determine the exact amount and cause of overpayment and record in the case record.
- (2) Either send an explanatory letter to the Applicant requesting repayment or send a letter to the Applicant scheduling an explanatory office interview.
- (3) Follow through with additional contacts as needed to initiate repayment.
- (4) Set up a payment schedule with the Applicant if needed.
- (5) The Agency cannot retrieve a payment made to an outside party from that outside party without agreement from both the Applicant and the outside party unless contacting the Applicant is impossible.
- (6) The Agency should record the following on the "overpayment" list name, social security number, amount owed, amount repaid, date repaid, and balance. The information should be updated after each payment. A copy of the repayments should be kept in the Applicant's case record.
- (7) Send collection letters when the Applicant fails to meet the repayment schedule.
- (8) Agencies should send all recoupments or refunds to their fiscal office according to the Agency's fiscal policies. The information should include:
 - (a) Name of Agency, county and outreach center, if applicable,
 - (b) Fiscal year of program in which overpayment occurred,
 - (c) Date the Agency overpaid benefit,

- (d) Agency's check number, if available,
- (e) Amount of repayment,
- (f) Name of Applicant as it appeared on the application,
- (g) Name of vendor who received payment.

D. Local agencies are expected to recoup any overpayments and reprogram the funds into the current contract cycle. In the event that the Agency is unable to do so, the amount of un-recouped funds must be returned to DEO from non-federal, unrestricted funds.

E. Refunds received during the current grant year from current grant year funds may be re-allotted back to the program and used to serve additional Clients.

F. Refunds received during any grant year from prior year grant funds must be returned to DEO, along with a Revised Closeout FSR showing the refund amount and revised de-obligated grant amount.

.12 Fraud Policy

A. CSBG provides quality services to thousands of Floridians. Unfortunately, like many worthwhile programs, there are instances of abuse in which some clients improperly use the system. DEO and each provider Agency has a responsibility to prevent and detect potential fraud. Each Agency is to have a policy on how fraudulent claims and reports of fraud will be handled.

B. Fraud occurs when an Applicant knowingly and willingly provides false information about their circumstances in order to receive assistance. Fraud also occurs when an Applicant intentionally fails to report changes in household circumstances in a timely manner that may impact their continued involvement in case management programs.

C. The following are some examples of fraud:

- People who do not declare all household assets or income whether earned or unearned.
- People who claim household members or list household members that do not actually reside in household (example-children).
- People who claim to reside at an address but do not actually live there.
- Couples pretending to be tenant and landlord and making up a fictitious tenancy.

D. Preventative measures should be taken to keep fraud from occurring in the first place. Due diligence during the application process can prevent the disbursement of funds to ineligible applicants. Early detection allows the agency to refer suspicious cases to the management where an examination of an applicant's case is made before benefits are received. Examination of these cases can determine whether the client is reporting accurate information, or attempting to receive benefits he or she may not be eligible to receive.

E. Detection of fraud occurs after funds have been disbursed on behalf of the client. Fraud can be detected with both open and closed cases, and can involve benefits received under a single program as well as multiple programs.

F. If after following the Agency's process for reporting potential fraud, and if it is determined that it appears that false information was provided during the application process, the file is denied and the client is notified in writing. If the fraud occurred from a previous application and disbursement of funds, the file enters into a repay phase.

G. If it is determined that the client received benefits based on false information provided by the client it is considered an overpayment. The Agency should attempt to recapture the funds and the client is given an opportunity to repay the funds in question.

(1) If the client makes contact with the Agency, payment arrangements may be discussed and formalized per the Agency's policy. The Agency should track all payments and notify the client when the obligation has been met.

H. Investigation and Prosecution

(1) Fraud is considered theft and a crime therefore the Agency should report the criminal activity to their local law enforcement agency.

(2) Once every attempt has been made to contact and work with the client for recovery of overpayments and the client has been unresponsive or uncooperative, the information should be turned over to local law enforcement.

(3) The Agency should continue to work with the prosecuting officials, and the Agency can, if requested, receive and track repayments from the client.

(4) All repayments must be returned to DEO.

(5) The Agency must contact DEO and keep staff informed as to the progress of the investigation, the disposition, and if any funds will be returned.

I. Future Eligibility – Minimums

(1) If an Applicant is found to have provided false or fraudulent information during the Application process, but is not awarded a CSBG benefit, the Applicant may reapply for benefits after a one-year period. The Applicant will be required to provide additional information and third party verification should be obtained where available in order to substantiate the information.

(2) If an Applicant is found to have provided false or fraudulent information during the application process and was awarded one or more CSBG benefits, the Client may not reapply until all awarded benefits are repaid. From the date the final repayment by the Client is made, there is at least a one-year waiting period before the Client may reapply.

(3) If a Client has committed fraud to receive benefits, was awarded CSBG benefits, and was charged with fraud, the Client may never again reapply for or receive funding through CSBG (lifetime).

Part 900 -- Eligible/Ineligible Applicants

.01 Eligible Applicants

To be eligible, Applicants must:

A. Have a total gross household income that does not exceed 125 percent (125%) of the current Office of Management and Budget Poverty Guidelines.

B. Provide income documentation of all household income sources that is no more than one year old. In the event that the Applicant cannot provide income documentation, the Agency shall require the Applicant to provide a signed self-declaration of income to attest to the applicant's verbal declaration of total household income. This self-declaration must specify the reasons that no current income documentation can be supplied by the applicant and a statement of how the applicant is providing for his/her basic needs.

.02 Residency

A. Applicants must be a resident of Florida and must apply for services in the county/area in which they live.

(1) Residents of group living facilities will be considered separate households. A group living facility is a place where several single person or multi person households live and share living quarters but are individually charged for the cost of residence based on the resident's ability to pay. Examples are facilities for blind persons, disabled adults, abused spouses and children, unwed mothers, and migrant workers. The facility may provide housing in separate structures.

B. Applicants must list a place as an address. The Agency must contact those that list only a post office box or non-living place as their address. If more than one household resides at the same location (apartment number, lot number or street address) the Applicant must provide clarification of their separate household status.

.03 Abandonment/Incarceration/Death/Absent Household Members

If the wage earner abandons the household, is incarcerated, or dies, the intake worker should consider only the income of any remaining family members. If any members of the household work in another city/county/state for extended periods of time, they must be counted as members of the household and their income counted if:

A. They list the Applicant address for which services are being requested as their main address;

B. Their income is used to support the household for which services are being requested.

Part 1000 -- Rights and Responsibilities of Applicants/Clients

- A. Applicants/Clients are responsible for notifying the CSBG office of any changes in address or situation.
- B. Applicants/Clients are responsible for notifying the CSBG office if they do not receive a Notice of Denial and Appeal or Notice of Approval and Appeal within a reasonable amount of time from the Application Date.
- C. Applicants/Clients are responsible for notifying the CSBG office if the credit is not made to their account, if applicable, within a reasonable timeframe.
- D. Applicants/Clients have the right to apply for services in a location that is accessible to them.
- E. Applicants/Clients have a right to privacy when providing information to Agency staff during the application process.
- F. Applicants are responsible for giving the Agency all of the information and verification needed for eligibility determination.
- G. Agencies such as shelters, housing projects, and group living facilities may not receive assistance for all their Clients as a unit.

Part 1100 -- Verification and Documentation

.01 Verification

Verification is the use of documents, systems, information or contacts with third parties to establish the accuracy of information provided by the Applicant during the interview and indicated on the application form. The Agency must use due diligence to verify CSBG eligibility requirements.

A. The Applicant has the primary responsibility for providing all required verification.

B. In situations where it is difficult for the Applicant to obtain verification needed to complete the eligibility determination, the Agency will offer assistance in obtaining the verification.

C. Three acceptable methods of verification are:

(1) An official document or photocopy of a document placed in the case record, such as a check, a check stub, an award letter, letter from employer (on letterhead or with a phone number for verification), a lease, a notice, etc. is the preferable method.

(2) Self-Declaration: A written statement declaring income and the reason for lack of documentation.

(3) A telephone call or personal contact with the employer, state, federal, or private Agency, or if the Client is receiving money from any individual not in the same household.

D. When the Agency obtains verification through a telephone call or personal contact, the date of the contact, name and title of the person contacted the source of income, the amount and dates received must be recorded.

E. When verification is by written letter, statement, or a document, the verification must be included in the Client file along with any notations.

.02 Documentation

The case file must contain all documents by which eligibility criteria was verified. Documentation must support eligibility, ineligibility, and the services to be provided and must be in sufficient detail to permit a reviewer to analyze the accuracy of the eligibility determination.

(1) Applicant's name, address, sex, race, and age;

(2) Names, ages, and identification documentation of all household members;

(3) Social Security Numbers and documentation of such numbers for all household members or the citation to the applicable exemption;

(4) Income amount and method of verification for all household members;

(5) Income documentation to support eligibility;

(6) Statement of self-declaration of income, if applicable;

- (7) Signed Notice Regarding Collection of Social Security Numbers, or statement to the applicable exemption;
- (8) Date Applicant was interviewed, services provided to the Applicant and documentation of any denial of services;
- (9) A signed CSBG Application with signatures of the Applicant, Recipient's representative, and supervisory staff;
- (10) Photo identification, expired and current, when providing assistance with CSBG funds for the Applicant to secure current identification documentation; and,
- (11) Rental/lease agreement or mortgage when providing rental or mortgage assistance with CSBG funds.

.03 Mandatory Verification – The following eligibility criteria must be verified:

A. Identity of the Applicant and Other Household Members: any document that establishes identity will be accepted. Documents include, but are not limited to:

- Driver's license
- Work or school ID
- ID card from health benefits or another assistance or social service program
- Voter registration card
- Birth certificate
- Family census card
- Other reasonable sources

B. Gross Countable Income of all household members: income may not exceed 125 percent (125%) of the current Federal Poverty Guidelines, updated annually by DEO. Refer to the most recent CSBG Federal Poverty Guidelines.

E. Social Security Numbers for Applicants and all household members or the citation to the applicable exemption.

(1) If an Applicant does not have an SSN or documentation of an SSN, the Agency must have the Applicant sign a statement as to why they do not have an SSN. The statement does not need to be notarized.

(2) The Agency should use due diligence to collect other types of documentation that contain a full or partial SSN to assist in verifying the identity of the Applicant and/or other household members.

Part 1200 -- Determining Income Eligibility

.01 General Requirements

- A. A household's total gross countable income shall not exceed 125% of the Federal Poverty Guidelines.
- B. Earned and/or unearned income will be considered in determining eligibility for services. The gross amount of income prior to deductions will be counted unless otherwise specified.
- C. Income will be counted as received at the time it is made available to the household. A check is considered received when it is added to the deposited account, put in the hands of the Client, or made available to the Client.
- D. Individuals whose income must be counted - Any income of a household member age 18 and older will be counted. Income for all persons ages 16 and 17, who do not attend school full time, will be counted.
- E. Earned income is defined as either cash, or in-kind income received as compensation for wages, salaries, commissions, or profit through employment or self-employment.
- F. Unearned income is defined as income which was not received as a result of the performance of a service, or earned from sources other than employment, self-employment or in-kind income.
- G. Acceptable Documentation of Income can include, but not be limited to:
1. Paycheck stubs(s);
 2. Copy of check, when gross earnings are listed;
 3. Employer's statement that is signed and dated. (When employer verification would jeopardize the Applicant's job, other means of verification must be pursued.)
 - a. The employer's statement must include the following:
 - (1) Name, address and telephone number of employer
 - (2) Frequency of receipt
 - (3) Gross amount of income
 - (4) Day of the week pay is received.
 4. Assistance payment records;
 5. Award letters from TANF, Food Stamps, SSI, SSD, etc.
 - a. When a check is used to verify the social security benefit amount, care must be taken to add the Medicare premium amount to the amount of the check if the individual has Medicare coverage and is not an SSI recipient.
 - b. Do not add the Medicare premium to the SSA amount if it is already included in the verification, such as when social security income is verified from Food Stamps, TANF/WAGES or SSA records.

6. Court records;
7. Local Agency records;
8. Divorce or separation papers or contact with the Clerk of the Court;
9. For Applicants receiving Supplemental Nutrition Assistance Program (SNAP) or Supplemental Security Income (SSI), program qualification approvals or notifications may be used to document household size and income.
10. A written statement from the source of a regularly received cash contribution.
11. Client's statement, WHEN NO OTHER VERIFICATION CAN BE OBTAINED.
 - a. All other possible verification sources must be exhausted before accepting Client statement. Document all attempts to verify and why the Client's statement is being allowed.
 - b. The statement must be signed by the Applicant.
 - c. The statement does not need to be notarized. If the Agency chooses to have the statements notarized, it must be done at no expense or additional hardship to the Applicant.
 - d. An Applicant cannot be denied for the reasons listed on the statement.
12. Self-Employment Documentation: When calculating self-employment income, the Applicant may deduct any business expenses. Gross income minus business expenses equals' countable income. Acceptable verification for self-employment includes, but is not limited to:
 - a. IRS Form 1099
 - b. Ledger statement
 - c. Client statement
13. Verification of Terminated Income
 - a. When job termination is reported in the prior 3 months to the date of the application, verify the following:
 - (1) The date of termination;
 - (2) Gross income received in the prior 3 months;
 - (3) The last payday and the gross amount paid.
14. Required Management Explanation: If the total household income is less than 50% of the current Federal Poverty Guidelines and no one in the household is receiving SNAP assistance, a signed statement is required from the Client explaining how basic living expenses

i.e., food, shelter and transportation are being met. An Agency cannot deny assistance due to the household's lack of resources to meet future needs.

.02 Included and excluded income

All agencies must use the most recent Sources of Allowable/Unallowable Income published and disseminated by DEO to all CSBG agencies.

.03 Calculating Income

All Agencies must use the most recent Sources of Allowable/Unallowable Income published and disseminated by DEO to all LIHEAP Agencies.

A. Use the past 30 days earnings for all occupants of the household (as defined) annualized, or the Applicant's most current economic situation, whichever is lower.

(1) Determine if the income is a continuous or annual source. A continuous or annual source would include annual salaries paid in less than 12 equal monthly installments. If the income source is a short-term source (i.e., a 6 month contract, etc.), determine the total timeframe to be used (6 months, 9 months, etc.).

(2) Total all countable income for the household within the past 30 day period.

(a) If the source is continuous/annual: Multiply by 12 to calculate the gross income. Determine the household size and use the LIHEAP Poverty Income Guidelines to determine if the household is income eligible (equal to or less than 150% of the FPG).

(b) If the source is less than an annual amount: Multiply by the maximum number of months the income source is available.

(3) If using most current economic situation, Agencies should take into account if an Applicant had been unemployed and just got a job, or if the Applicant recently became unemployed and is still unemployed at the time of application.

(4) A good rule of thumb, when computing annual income, is to use whichever method will provide the most accurate representation of the applicant's current economic situation.

(5) For salaried employees, such as teachers and select school board employees, who may periodically go unpaid during periods of employment, such as summer vacation, the Agency will reserve the right to calculate income based on their gross salary and any additional overtime payments they may have received over the past 12 months.

Part 1300 -- Required Notices and Appeals

All Agencies are required to have a policy for providing a written notice of denial and appeal for any Applicant denied CSBG services. The notice must include the appeals process and the reason(s) for the denial. In cases where the denial is for lack of documentation, the Agency must explain what specific documents are required in order for the applicant to reapply for services.

.01 Reconsideration

- A. Reconsideration means to re-evaluate eligibility, ineligibility, or the payment amount based on information that was unavailable or used incorrectly when the Agency decided eligibility.
- B. DEO suggests a supervisory review when:
 - (1) An Applicant received a denial notice; and,
 - (a) The Applicant requested reconsideration within the required timeframe stated in the Notice of Denial and Appeals.
 - (b) The Applicant requested reconsideration while funds remained.
 - (2) An Applicant who is denied due to failure to provide requested information or verification submits the required information and funds remain.
 - (3) An Applicant, who is denied, complains about the decision. In reviewing the case, staff finds the complaint has merit.
 - (4) An Applicant, who is approved, complains about the amount of the benefit and the Agency finds that the payment was calculated incorrectly.
 - (5) During case monitoring, it is found that the original decision (approval or denial) was possibly incorrect.

.02 Notice Regarding Collection of Social Security Numbers

All Applicants who provide their SSN must sign the Notice Regarding Collection of Social Security Numbers. A sample form is provided **at Exhibit 2** of this manual. If an Applicant does not have a SSN or there is a reason no SSN is obtainable, the Agency must note this in the file.

Part 1400 – Reporting Requirements

.01 CSBG Annual Information System (IS) Survey

This report is currently collected via an Excel spreadsheet. It is due by November 15 of each year. The most current form and instructions for the IS Survey is included with this policy as **Exhibit 6**.

.02 Community Action Plan

This report is required per the CSBG Act. Each Agency shall submit its completed Community Action Plan on an annual basis. It is due by November 15 of each year. The most current template and instructions for the Community Action Plan is included with this policy as **Exhibit 9**.

.03 CSBG Organizational Standards Field Guide

This document is required per OCS IM-138, issued January 26, 2015. It will be due by November 15 of each year, along with any accompanying documentation to support meeting the Standards. The most current form of the Field Guide and Instructions is included with this policy as **Exhibit 8**. For additional information on Florida's assessment plan, see Part 600.06 of this Manual.

.04 CSBG Quarterly FOCAS Report

The CSBG Quarterly Florida Outcomes for Community Action Systems (FOCAS) Report is currently collected via an Excel spreadsheet. It is due no later than twenty-one calendar days following the end of the quarter. The most current form for the FOCAS Report is included with this policy as **Exhibit 6**.

.05 Reporting Time Periods

A. Annual Reports:

(1) The time period covered by the Annual IS Survey is the Federal Fiscal Year (FFY), from October 1 through September 30 of each year. The data to be reported are not per Agreement, but per the FFY.

(2) Agencies must be able to collect unduplicated numbers of households served and the specific demographic data collected.

B. Quarterly Report:

(1) The time period covered by the CSBG Quarterly FOCAS Report is the three-month quarter for which the agency is reporting on. Example: January-March, April-June, July-September, and October-December.

(2) The data reported, number of households assisted and number of applicant households do not correspond to the Agreement period.

Part 1500 – Use of Results Oriented Management and Accountability (ROMA)

.01 Required ROMA Participation

Section 14.12. 676(b)(12) of the Act requires state offices to provide "an assurance that the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and [describe] outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization."

The CSBG eligible entities in Florida have been implementing the principles and practices of the Results Oriented Management and Accountability System (ROMA) since October 1997. In developing their Community Action Plans, all eligible entities are required to incorporate the principles and practices of ROMA in relation to measuring performance and results in promoting self-sufficiency, family stability, and community revitalization. Since 2003, DEO has required its eligible entities to submit an annual CSBG Worksheet and corresponding workplan as part of their annual grant agreements that mirrors the IS Survey. Doing so encourages CAAs to examine their stated goals and determine if adjustments need to be made based on need, changes in demand, or changes in funding availability. To assist agencies in using ROMA, Florida has 11 ROMA Certified Trainers, including one ROMA Certified Trainer in the state office. Florida also has 13 Certified Community Action Professionals (CCAPs) across the state, including a CCAP at the state office.

Each agency is required to submit a completed Community Action Plan based on its most recent community needs assessment that includes information on mission statements, goals, objectives, community engagement, linkages, implementation of ROMA, etc. The CAP is also tied to the annual assessment of Organizational Standards.

The State supports the CAAs in using the ROMA system as required by Public Law 97-35, as amended, all CAAs must submit to DEO their completed Florida Community Action Plan which includes information on their most recent community needs assessment, succession planning, mission statement, board policies, community engagement, customer satisfaction, etc. The Florida Community Action Plan template will promote the use of ROMA, assist with the aggregation of CSBG data, improve the state's ability to tell the story of community action's impact, assist in evaluating the effectiveness and efficiency of activities, and focus the work on client outcomes instead of program activities at the national level.



CSBG

POLICIES AND PROCEDURES MANUAL

EXHIBITS

EXHIBIT 1

Frequently Asked Questions

NOTE:

The following questions and answers are *guidance only* and should not be interpreted to be final policy. All Agencies must comply with the CSBG Subgrant Agreement and Model State Plan. In the event any of the Q&A's differ from the Agreement or State Plan, the Agency is encouraged to contact the state office for clarification.

EXHIBIT 2

Notice of Collection of Social Security Numbers

The following disclosure is being made pursuant to section 119.071(5), Florida Statutes.

Social security numbers of applicants and household members are requested because this information has been determined to be imperative for the performance of the duties and responsibilities prescribed by law under the Community Services Block Grant Program. This information is not required by state or federal law; however, social security numbers are necessary to determine eligibility for program services and specifically for the following purposes:

1. To verify an applicant's identity.
2. To verify household size.
3. To verify household income.

A social security number collected pursuant to this notice can only be used by the Florida Department of Economic Opportunity and _____ (Recipient) for the purposes specified above.

Nondisclosure except under limited circumstances.

Social security numbers will not be disclosed to others unless required or authorized by Florida law. Section 119.071(5), Florida Statutes, allows disclosure of a person's social security number under the following specific, limited circumstances:

- If disclosure is expressly required by federal or Florida law or is necessary for the agency or governmental entity to perform its duties and responsibilities;
- If the individual expressly consents to disclosure in writing;
- If disclosure is made to prevent and combat terrorism pursuant to the U.S. Patriot Act of 2001 or Presidential Executive Order 13224 (blocking property and prohibiting business transactions with persons who commit, threaten to commit, or support terrorism);
- For an agency employee and dependents, if disclosure is necessary to administer the person's health benefits or pension plan funds; or
- If disclosure is for the purpose of the administration of the Uniform Commercial Code by the office of the Secretary of State.
- If disclosure is requested by a commercial entity for permissible uses under the federal Driver's Privacy Protection Act of 1994, the federal Fair Credit Reporting Act, or the federal Financial Services Modernization Act of 1999 (for example, to verify the accuracy of personal information provided by the individual to the commercial entity; use by an insurer in connection with claims investigation or anti-fraud activities; for use in connection with a credit transaction).

Acknowledgment of Receipt of Notice

I confirm that I have been provided a copy of this Notice regarding the collection of my social security number and the social security numbers of all household occupants as part of the application process for the Florida Community Services Block Grant Program.

Signature of Applicant

Signature of Agency Staff

EXHIBIT 3

FY20___ MODEL STATE PLAN
(separate document)

EXHIBIT 4

FY20___ SUBGRANT AGREEMENT

(separate document)

EXHIBIT 5
CSBG FIELD MONITORING MANUAL
(separate document)

EXHIBIT 6
CSBG REPORTING FORMS
(separate documents)

EXHIBIT 7

DEO AGENCY RISK ASSESSMENT

DEO Bureau of Community Assistance RISK ASSESSMENT

AGENCY NAME	ABC Florida	DEO APPROVAL	
PROGRAM	LIHEAP	Assessment Completed By:	
AGREEMENT NUMBER	15EA-OF	Date Completed:	
AGREEMENT PERIOD	March 1, 2015-March 31, 2016	Reviewed By:	
AMOUNT OF AWARD	\$500,000		

RISK FACTORS	POINT VALUES				MAX	AGENCY SCORE	PERCENT
TYPE OF AGENCY	Non Profit = 10	Public = 15			15	10	66.67%
AMOUNT OF AWARD	\$0-\$500K = 30	\$501K-\$1M = 25	\$1M-\$2M = 20	Over \$2M = 15	30	30	100.00%
TOTAL AGENCY BUDGET	\$0-\$500K = 30	\$501K-\$1M = 25	\$1M-\$2M = 20	Over \$2M = 15	30	15	50.00%
PERCENT OF AWARD/AGENCY BUDGET	0-25% = 10	26-50% = 8	51-75% = 6	76-100% = 4	10	10	100.00%
NUMBER OF AUDIT FINDINGS (A-133)	0-5 = 10	6+ = 5			10	10	100.00%
NUMBER OF MONITORING FINDINGS	0-5 = 5	6+ = 2			5	5	100.00%
TOTAL SCORE					100	80	80.00%

RESULTS	<35%
HIGH RISK	
MEDIUM RISK	35%-70%
LOW RISK	>70%

EXHIBIT 8

CSBG Organizational Standards Field Guide (separate documents)

EXHIBIT 9

CSBG Community Action Plan Template (separate document)