Office of Economic Opportunity

CSBG Monitoring Principles & Practices

Our Mission

Working in partnership with the private sector, community-based organizations, government agencies, and others to

- Increase self-sufficiency of Vermonters

- Strengthen Vermont communities

- Eliminate the causes & symptoms of poverty

How We Work

- Manage programs & grants

- Training and technical assistance

- Results and performance accountability

- Identify and develop resources for communities

- Promote approaches based on evidence and research to improve policy and practice

Core Areas of Work

- Home Weatherization Assistance Program
- Community Services Block Grant
  - Core funding for Community Action Agencies
- Financial Empowerment
  - Micro Business Development Program
  - Vermont Matched Savings Program (aka IDA)
- Homeless Assistance
  - Housing Opportunity Grant Program
  - Family Supportive Housing Program

OEO Staff & Partners

- 8 staff (based in Waterbury)
- 50+ Partners (grantees):
  - Community Action Agencies (5)
  - Weatherization Providers
  - Homeless Shelter and Service Providers
  - Family Supportive Housing Providers
- Work with several stakeholder groups on issues that intersect with our work – poverty, homelessness and energy

OEO's Guiding Principles

Open Communication

Mutual Respect

Joint Problem-Solving

Inclusion & Diversity

Ethical Conduct

Common Perspectives

Monitor/State Staff:

- Duty
- Discomfort

Management:

- Helpful/getting better
- Judgment
- Misunderstood, loss of perspective
- Distracting
- Not concerned

Monitoring Approach

Start with Our Principles

Monitor for Impact

Validate Compliance

Have a Plan (Specific to the Program)

Monitor Systems – Forest (not just Trees)

Monitoring = T/TA

Monitoring Plan

Purpose & Principles

Monitoring Basis

- grant agreement; statute; state plan; regulations, policy or rules; program/performance reports; financial reports/cash requests

Activities – what, when

- pre-award risk assessment, inspections, desktop monitoring, onsite financial/programmatic monitoring, etc.

Frequency (prioritization factors)

Monitoring Tools (list)

CSBG in Vermont

Onsite Financial & Programatic Monitoring

Organizational Standards Review

Workplan & Budget Review (pre-award risk assessment)

Quarterly & Annual Reports

Single Audit Review

Monthly Financial Reports & Close Out

Ongoing touch points:

- Board meetings
- Partnership/ED meetings
- ROMA Community of Practice (program managers)

CSBG in Vermont

Action Plan

Technical Assistance Plan

Monitoring Response Plan

Quality Improvement Plan

"unmet requirements", "required action" "strengths", "recomendations", "opportunities", "for consideration", "concerns"

Always includes an offer of T/TA from OEO

Monitoring Tips

- Teams (for onsite) whenever possible
- Look at past performance/reports
- Relationships matter
- Focus on follow up
- Use CAPLAW, CAP, national resources
- Add value for the grantee (not just your agency)
- Be reasonable
- Honor the spirit of the requirement

Vermont CSBG Example

Client Eligibility (125% FPL)

- Review State Office Policy – Direct assistance, proportional eligibility, asset-building programs
- Review Client Files
- Review Department/Program budgets and department/program summary demographic reports
- Discuss eligibility and recordkeeping in staff interviews
- Adjusted approach for community-level work
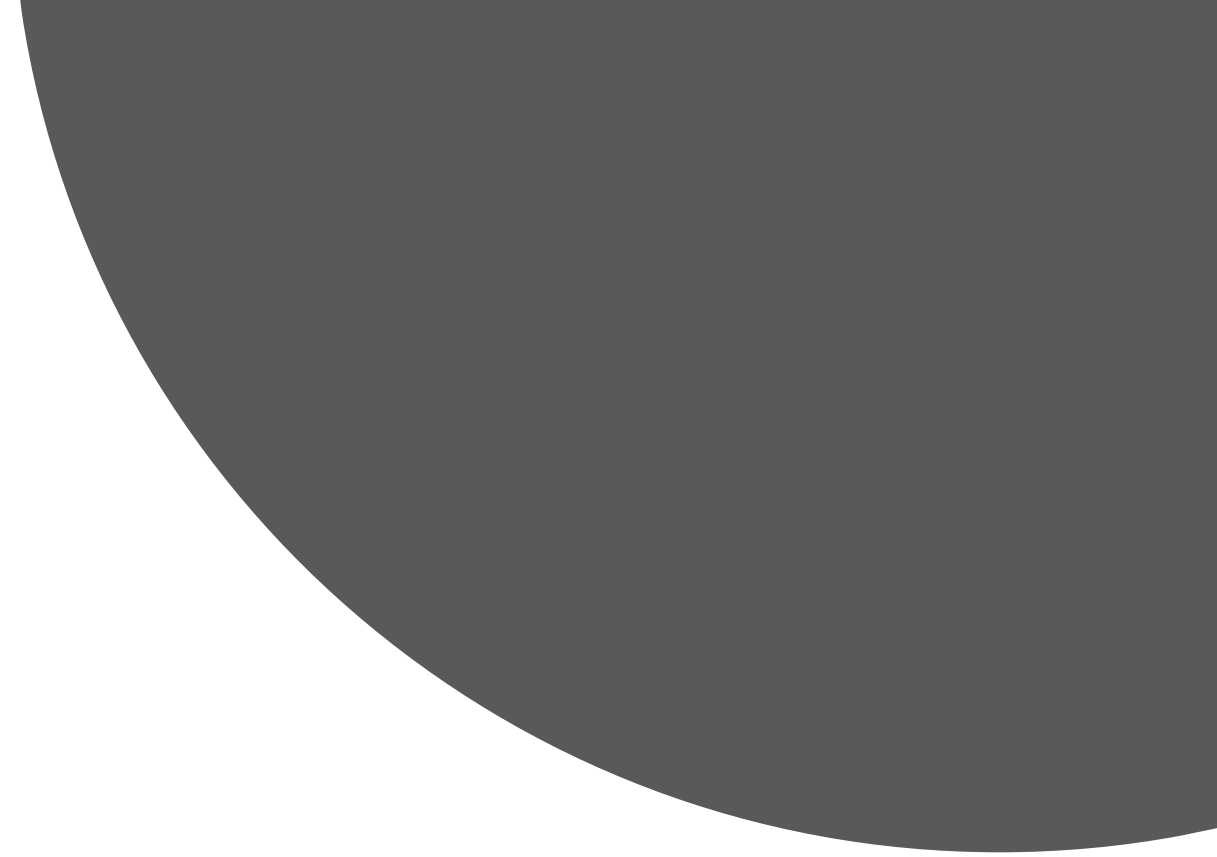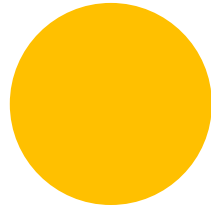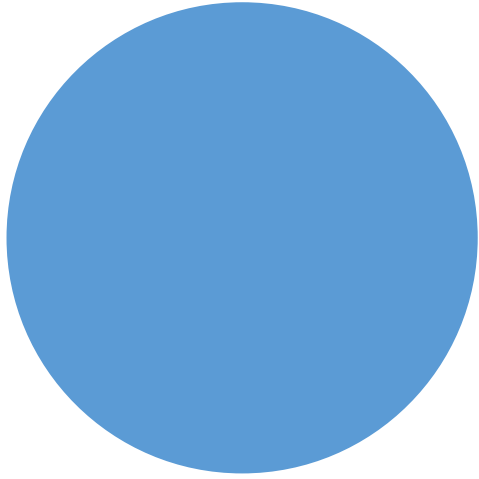
Maximizing the Monitoring Experience
NASCSP Winter Conference
February 25, 2020

Presented by: Leslie Taylor, Deputy Director

Department of Community Services and Development

Presentation Overview

- California
  - State Office
  - CSBG Network
- Know The Requirements
- Build the Ark... Before the Rain!
- Inform and Engage
- Make Compliance a New Friend

State Department

- Dept of Community Services and Development
  - Community Services Division
    - Program Development
    - Technical Support
    - Field Operations
      - Manager
        - 4 Field Representatives
          - Assigned to 15 eligible entities
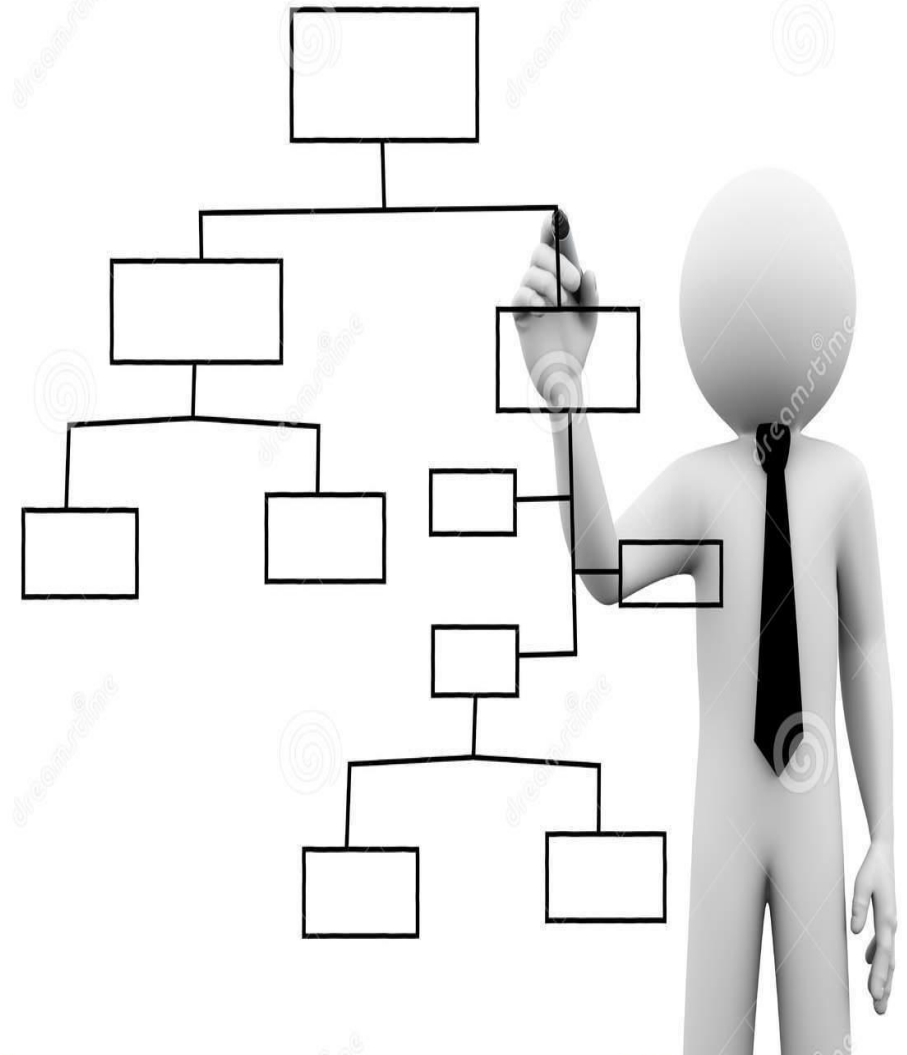
California CSBG Network

- 60 CSBG Eligible Entities
  - CAA
  - MSFW
  - NAI
  - Public/Private
- 58 Counties
- 2020 Allocation: $65M

Know The Requirements

CSBG Monitoring

CLOSED PLEASE GO AWAY

State CSBG Monitor

NASCSP | State Monitoring Practices

The Facts

The CSBG Act requires the State CSBG office to monitor designated local Community Action Agencies ...(Public Law 105 – 285 Section 678 B)

➢ A full onsite review of each such entity at least once during each 3-year period.
➢ An onsite review for each newly designated entity immediately after the completion of the first year.
➢ Follow up reviews, including prompt return visits to entities that fail to meet the goals, standards, and requirements set by the State.
➢ Other reviews as appropriate

Annual CSBG Contract Language

Compliance Monitoring

A.2   As the State CSBG administrator, CSD must conduct <u>onsite and follow-up monitoring, and other audits/reviews as necessary</u>, to ensure that: Contractor meets federal and state performance goals, administrative and financial management standards, and other requirements, including federal organizational standards, as discussed in Section 7.2, applicable to CSBG-funded programs….

Maintaining the Larger Picture

➢ Mutual Respect

➢ Open Communication

➢ Joint Problem Solving

THE BIG PICTURE

Definition of Monitoring

A comprehensive approach to ensuring compliance with Federal, State, Eligible Entity performance goals, administrative standards, financial requirements and Federal regulations governing the CSBG program, including reviewing, assessing, evaluating, and improving the quality and types of services provided by CSBG sub-recipients to low-income individuals and families.

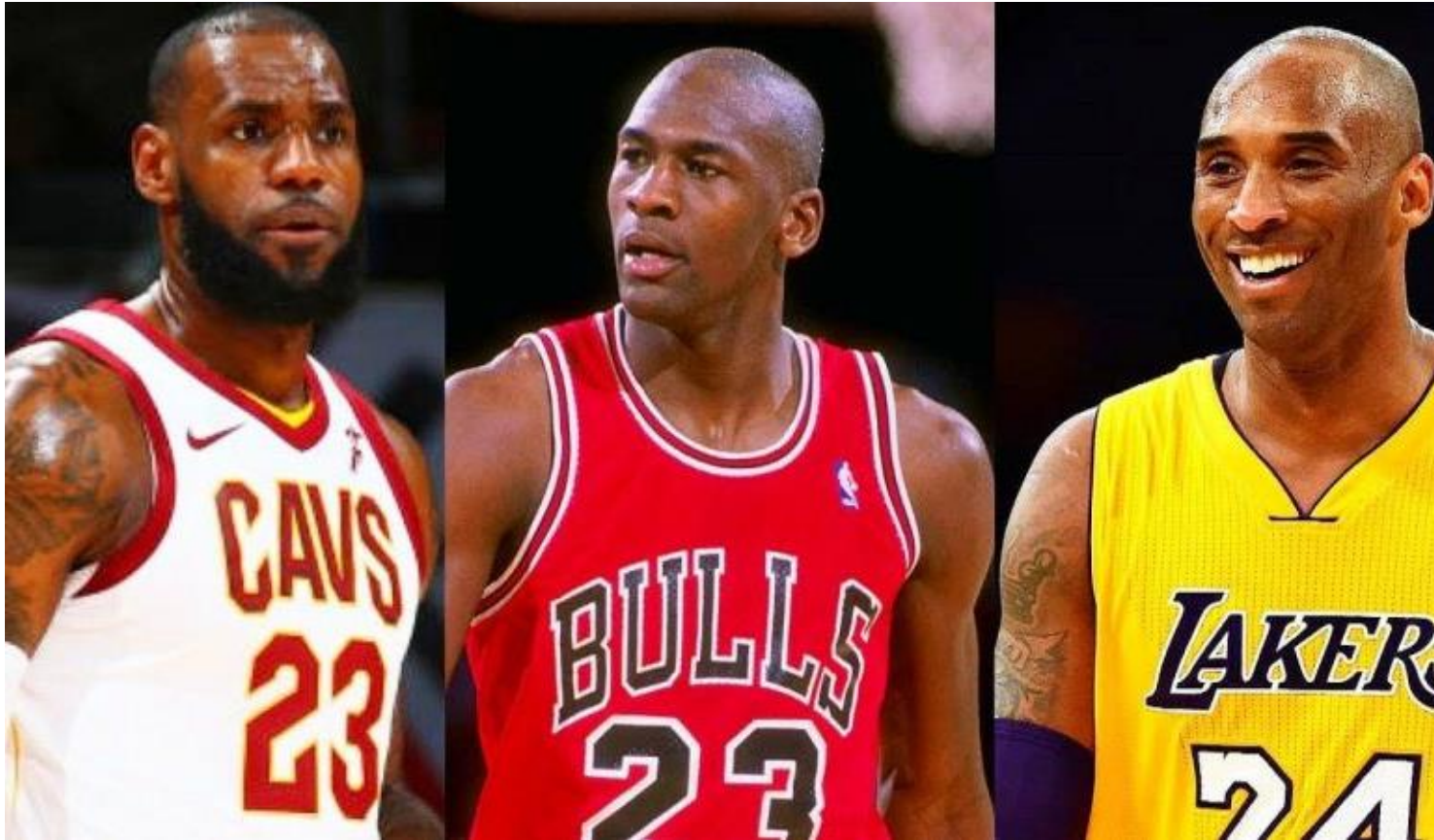# Build the Ark... Before The Rain!

Effective Oversight

1. Monitor a CAA and conduct follow-up reviews as necessary;

2. Inform a CAA of a deficiency and require the CAA to correct it;

3. Provide training and technical assistance to the CAA and accept or reject quality improvement plans developed by the CAA;

Federal Law & Applicable Regulations

Monitoring Tool

Effective Oversight

State Contract

Policies & Procedures

**4. Take action up to and including de-designation as a last resort**

- Start the Process Early
- Select Your Champion(s)
- Select a Person of Influence (Data Requests)
- Review the Most Current Monitoring Webinar
- Put Your Subcontractors on Notice

Establish a Team Coordinator and Draft the Team

On-going Monitoring – Year Round Activity

State's Monitoring Polices/ Procedures

- Helps the planning/preparation process
- Clearly Illustrates the steps involved
- Identifies key contributors
- Prevent staff from starting at "ground zero" every time
- De-stress the process and facilitates a better visit
- Maintains organizational knowledge when
 staff turnover happens

POLICIES & PROCEDURES
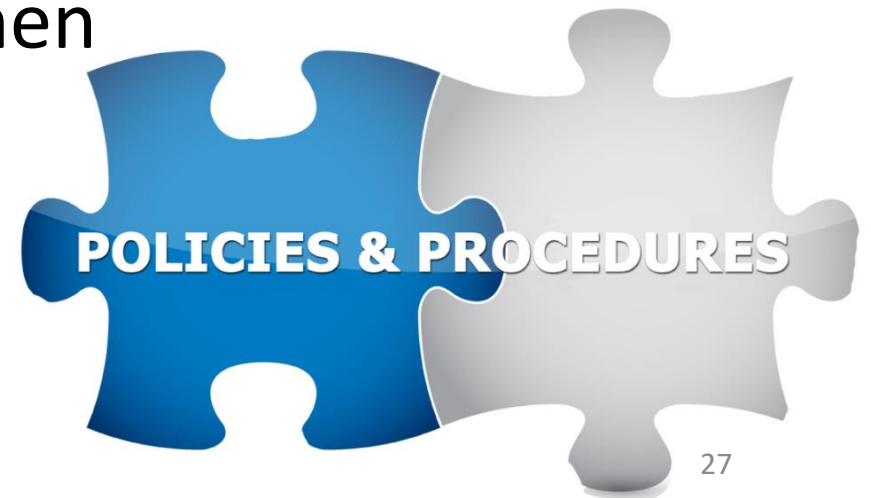
Help your Eligible Entities Get Familiar with your Monitoring Process and Tools

- Monitoring schedule presented in the Annual/Biennial State Plan

- Communicate with your Program Manager/Executive Director

- Share where resources are located (CSD Provider's Website)

- Conduct an Annual Monitoring Webinar (review monitoring scope)

- Develop an overview of the monitoring process

Help your Eligible Entities Get Familiar with your Monitoring Process and Tools-Continued

- CSD Monitoring Procedures (State Plan)
- On-site monitoring tool
- Document repository
- Desk Review results
- Monitoring report template questions
- Encryption procedure
  - Protect personal identifying information
  - Provide only requested information

Prior Activities Conducted before Monitoring

Review pertinent materials in the agency's contract file including:

- ➢ CSBG Contract and amendments
- ➢ Community Action Plan
- ➢ Work Plan/Annual Report Data
- ➢ Approved Budget by Categories
- ➢ Progress & Financial reports
- ➢ Review Board Documents
- ➢ Prior Monitoring Documentation
- ➢ Organizational Standards

Agency - Self Assessment Prior to Visit

Review pertinent materials in the agency's contract file including:

➢ Community Action Plan/Strategic Plan adherence

➢ Data Collection and Reporting

➢ Programmatic & Financial Reports

➢ Procedures/tools to validate outcomes

➢ Any Outstanding/in-process organizational standard TAPs

➢ Prior Monitoring Corrective Action(s)

Inform and Engage

California's Onsite Monitoring Activities

- Pre-Monitoring Assessment (PMA)
- Desk Review results
- Review pre onsite documentation (fiscal and programmatic
- Review board documents
- Conduct onsite review
- Draft Report Review
- Final Report
  - Recommendations
  - Observations
  - Findings
- –

Let's face it...
Compliance monitoring involves a partnership; supportive partners to accomplish a mutual goal!

Role of the Field Monitor

➢ Resource to the CAA/Network

➢ Reviewer of Program Deliverables

➢ Training and Technical Assistance

➢ Convener

Benefits of the Monitoring Experience

➢Objective Identification of areas of Weakness

➢Reduces and Exposes areas of Risk

➢Ensures agencies are aware of all applicable legal requirements

➢Enhances agency efficiency – Window to Best Practices

➢Encourages free and broad utilization of ROMA principles

➢Feedback to support further Improvement

➢Objective partner in helping families move out of poverty.

Make Compliance a New Friend

Health

"Monitoring community action agencies is part of a process to strengthen CAAs and the entire Community Action network

The monitoring process should serve several purposes, including to provide the CAA with feedback about its programs, going beyond compliance to include an assessment of the CAA's ability to impact lives.

Communication and Feedback Mechanisms

➢ Monitoring survey

➢ ACSI

➢ Comments on draft work product

➢ Monitoring Team

  ➢ Assigned Field Representative

  ➢ Field Operations Manager

Monitoring Survey

Monitoring Resources

Attachment 4: CSD California State Monitoring Procedures

California Department of Community Services and Development

**Community Services Division
Field Operations Unit**

Community Services Block Grant

Monitoring Procedures

State of California
Department of Community Services and Development
Community Services Division
On-Site Monitoring Tool

Agency Name:

Date of Entrance Conference:

CSD Representative(s):

Agency Representative(s) and Title:

Agency Type: ☐Public ☐Private ☐MSFW ☐NAI ☐LPA

Entrance Conference:

Field Representative, discuss topics to be reviewed during the visit, including any concerns that might have been identified during the Desk Review:

A. Route the sign-in sheet to the individuals attending the entrance conference.

B. The following items should be discussed during the entrance conference:

    1. Results of internal review

    2. Organizational Standards

    3. Current rate of expenditures

    4. Other items as applicable

C. Technical Assistance/Training Update (if applicable)

D. Review agenda and coordinate staff schedules

On-Site Tool (REV 3/12/2018)

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2018 Monitoring Season Survey
CSD's Community Services Division
Field Operations Unit

Introduction

The purpose of the 2018 Monitoring Season Survey is to measure Community Services Block Grant (CSBG) Eligible Entities satisfaction with how the 2018 Monitoring was performed by CSD's Community Services Division - Field Operations Unit. The feedback received will assist the Field Operations Unit to further improve the way we carry out our oversight responsibilities by further strengthening its effectiveness, increase efficiency, offer transparency, and further improve the partnership between CSD and the CSBG Eligible Entities.

We understand that multiple staff at varying levels participate in the monitoring process. However, CSD is requesting one response per agency.

Your valuable time and consideration is greatly appreciated!

CONTACT INFORMATION

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