

CSBG State Plan

Program Name: Community Services Block Grant

Grantee Name: MICHIGAN DEPARTMENT OF HEALTH AND HUMAN SERVICES

Report Name: CSBG State Plan

Report Period: 10/01/2024 to 09/30/2025


Report Status: Submission Accepted by CO

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CSBG Cover Page (SF-424M)

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration for Children and Families Community Services Block Grant (CSBG)				Form Approved OMB No: 0970-0382 Expires: 09/30/2025	
COVER PAGE					
* 1.a. Type of Submission: <input type="radio"/> Application <input checked="" type="radio"/> Plan <input type="radio"/> Other (2 Year)		* 1.b. Frequency: <input type="radio"/> Annual <input checked="" type="radio"/> Other (2 Year)		* 1.c. Consolidated Application/Plan/Funding Request? Explanation:	
		* 1.d. Version: <input checked="" type="radio"/> Initial <input type="radio"/> Resubmission <input type="radio"/> Revision <input type="radio"/> Update		2. Date Received:	
		3. Applicant Identifier:		State Use Only:	
		4a. Federal Entity Identifier:		5. Date Received By State:	
		4b. Federal Award Identifier:		6. State Application Identifier:	
7. APPLICANT INFORMATION					
* a. Legal Name: Michigan Department of Health and Human Services					
* b. Employer/Taxpayer Identification Number (EIN/TIN): 13860000134F1				* c. Organizational DUNS: 113704139	
* d. Address:					
* Street 1:	333 S Grand Ave		Street 2:	P.O. Box 30195	
* City:	Lansing		County:	Ingham	
* State:	MI		Province:		
* Country:	United States		* Zip / Postal Code:	48909	
e. Organizational Unit:					
Department Name: Michigan Department of Health and Human Services				Division Name: Bureau of Community Action and Economic Opportunity	
f. Name and contact information of person to be contacted on matters involving this application:					
Prefix:	* First Name: Elizabeth		Middle Name:	* Last Name: Hertel	
Suffix:	Title: MDHHS Director		Organizational Affiliation:		
* Telephone Number: (517) 241-3626	Fax Number:		* Email: mdhhs-director@michigan.gov		
* 8a. TYPE OF APPLICANT: A: State Government					
b. Additional Description:					
* 9. Name of Federal Agency:					
		Catalog of Federal Domestic Assistance Number:		CFDA Title:	
10. CFDA Numbers and Titles		93569		Community Services Block Grant	
11. Descriptive Title of Applicant's Project FY25-FY26 CSBG State Plan Application					
12. Areas Affected by Funding: State of Michigan					
13. CONGRESSIONAL DISTRICTS OF:					
* a. Applicant 7			b. Program/Project: Statewide		
Attach an additional list of Program/Project Congressional Districts if needed.					
14. FUNDING PERIOD:			15. ESTIMATED FUNDING:		
a. Start Date:	b. End Date:	* a. Federal (\$): \$0		b. Match (\$): \$0	
* 16. IS SUBMISSION SUBJECT TO REVIEW BY STATE UNDER EXECUTIVE ORDER 12372 PROCESS?					
a. This submission was made available to the State under the Executive Order 12372					
Process for Review on :					

b. Program is subject to E.O. 12372 but has not been selected by State for review.	
c. Program is not covered by E.O. 12372.	
* 17. Is The Applicant Delinquent On Any Federal Debt? <input type="radio"/> YES <input checked="" type="radio"/> NO	
Explanation:	
18. By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001) **I Agree <input checked="" type="checkbox"/>	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
18a. Typed or Printed Name and Title of Authorized Certifying Official	18c. Telephone (area code, number and extension)
	18d. Email Address
18b. Signature of Authorized Certifying Official 	18e. Date Report Submitted (Month, Day, Year) 09/30/2024
Attach supporting documents as specified in agency instructions.	

Section 1: CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration for Children and Families Community Services Block Grant (CSBG)		Form Approved OMB No:0970-0382 Expires:09/30/2025	
SECTION 1 CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter			
1.1. Identify whether this is a One-Year or a Two-Year Plan		<input type="radio"/> one-year <input checked="" type="radio"/> two-year	
1.1a. Provide the federal fiscal years this plan covers:		Year One 2025	Year Two 2026
1.2. Lead Agency and Authorized Official: Update the following information in relation to the lead agency and authorized official designated to administer CSBG in the state, as required by Section 676(a) of the CSBG Act. <i>Information should reflect the responses provided in the Application for Federal Assistance, SF-424M.</i>			
Has information regarding the state lead agency and authorized official changed since the last submission of the State Plan? <input type="radio"/> Yes <input checked="" type="radio"/> No			
If yes, select the fields that have been changed [Check all the apply]			
<input type="checkbox"/> Lead Agency	<input type="checkbox"/> Department Type	<input type="checkbox"/> Department Name	
<input type="checkbox"/> Authorized Official	<input type="checkbox"/> Street Address	<input type="checkbox"/> City	
<input type="checkbox"/> Zip Code	<input type="checkbox"/> Office Number	<input type="checkbox"/> Fax Number	
<input type="checkbox"/> Email Address	<input type="checkbox"/> Website		
1.2a. Lead agency			
1.2b. Cabinet or administrative department of this lead agency [Check one and provide a narrative where applicable]			
<input type="radio"/> Community Affairs Department			
<input type="radio"/> Community Services Department			
<input type="radio"/> Governors Office			
<input type="radio"/> Health Department			
<input type="radio"/> Housing Department			
<input checked="" type="radio"/> Human Services Department			
<input type="radio"/> Social Services Department			
<input type="radio"/> Other, describe			
1.2c. Cabinet or Administrative Department Name: Provide the name of the cabinet or administrative department of the CSBG authorized official		Michigan Department of Health and Human Services	
1.2d. Authorized Official of the Lead Agency			
Name: Elizabeth Hertel		Title: Director, MDHHS	
1.2e. Street Address		333 S. Grand Avenue; P.O. Box 30195	
1.2f. City		Lansing	1.2g. State MI
		1.2h. Zip 48909	
1.2i. Telephone number 517 241 - 3626 ext.		1.2j. Fax number -	
1.2k. Email address MDHHS-Director@michigan.gov		1.2l. Lead agency website www.michigan.gov/mdhhs	
1.3. Designation Letter: Attach the state's official CSBG designation letter. A new designation letter is required if the chief executive officer of the state and/or the designated agency has changed.			
1.4. CSBG Point of Contact: provide the following information in relation to the designated state CSBG point of contact. The state CSBG point of contact should be the person that will be the main point of contact for CSBG within the state.			
Has Information regarding to the state point of contact has changed since the last submission of the State Plan? <input checked="" type="radio"/> Yes <input type="radio"/> No			

If yes, select the fields that have changed [check all the apply]			
<input type="checkbox"/>	Agency Name	<input checked="" type="checkbox"/>	Point of Contact
<input type="checkbox"/>	City	<input type="checkbox"/>	Zip Code
<input type="checkbox"/>	Fax Number	<input type="checkbox"/>	Email Address
<input type="checkbox"/>		<input type="checkbox"/>	Website
1.4a. Agency Name Bureau of Community Action and Economic Opportunity			
1.4b Point of Contact Name			
Name: Ben Gulker		Title: CSBG Specialist	
1.4c. Street Address		235 S Grand Ave	
1.4d. City		Lansing	1.4e. StateMI 1.4f. Zip 48909
1.4g. Telephone Number 517 285 - 8053 ext.		1.4h. Fax Number -	
1.4i. Email Address mdhhs-bcaeo@michigan.gov		1.4j. Agency Website www.michigan.gov/BCAEO	
1.5. Provide the following information in relation to theState Community Action Association.			
There is currently a state Community Action Association within the state. <input checked="" type="radio"/> Yes <input type="radio"/> No			
Has Information regarding the state Community Action Association has changed since the last submission of the State Plan? <input checked="" type="radio"/> Yes <input type="radio"/> No			
If yes, select the fields that have been changed [Check all the apply]			
<input type="checkbox"/>	Agency Name	<input checked="" type="checkbox"/>	Executive Director
<input type="checkbox"/>	City	<input type="checkbox"/>	State
<input type="checkbox"/>	Office Number	<input type="checkbox"/>	Fax Number
<input type="checkbox"/>	Website	<input type="checkbox"/>	RPIC Lead
1.5a. Agency Name Michigan Community Action Agency Association			
1.5b. Executive Director or Point of Contact			
Name: Brian McGrain		Title: Executive Director	
1.5c. Street Address		2173 Commons Parkway	
1.5d. City		Okemos	1.5e. StateMI 1.5f. Zip 48864
1.5g. Telephone number 517 679 - 6400 ext.		1.5h. Fax number -	
1.5i. Email Address bmcgrain@micommunityaction.org		1.5j. State Association Website https://www.micommunityaction.org/	
1.5k. State Association currently serves as the Regional Performance Innovation Consortia (RPIC) lead <input type="radio"/> Yes <input checked="" type="radio"/> No			

Section 2: State Legislation and Regulation

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

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SECTION 2 State Legislation and Regulation

2.1. CSBG State Legislation:

State has a statute authorizing CSBG ☒ Yes ☐ No

2.2. CSBG State Regulation:

State has regulations for CSBG ☒ Yes ☐ No

2.3. Legislation/Regulation Document: *Attach the legislation and/or regulations or provide a hyperlink(s) to the documents indicated under Item 2.1. and/or Item 2.2.*

<https://www.legislature.mi.gov/Laws/MCL?objectName=MCL-ACT-230-OF-1981>

2.4. State Authority:

Select a response for each of the following items about the state statute and/or regulations authorizing CSBG:

2.4a. Authorizing Legislation: State legislature enacts authorizing legislation or amendments to an existing authorizing statute, last federal fiscal year ☐ Yes ☒ No

2.4b. Regulation Amendments: State established or amended regulations for CSBG last federal fiscal year ☐ Yes ☒ No

Section 3: State Plan Development and Statewide Goals

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
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SECTION 3

State Plan Development and Statewide Goals

3.1. CSBG Lead Agency Mission and Responsibilities:

Briefly describe the mission and responsibilities of the state agency that serves as the CSBG Lead Agency.

MDHHS provides services and administers programs to improve the health, safety, and prosperity of the residents of the state of Michigan. MDHHS' vision is to deliver health and opportunity to all Michiganders, reducing intergenerational poverty and promoting health equity.

3.2. State Plan Goals:

Describe the state's CSBG-specific goals for state administration of CSBG under this State Plan.

(Note: This information is associated with State Accountability Measure 1Sa(i) and pre-populates the State's Annual Report, Module 1, Item B.1.)

Goal 1: BCAEO will expand its training and technical assistance opportunities by offering the BCAEO Academy. The BCAEO Academy will be comprised of at least one in-person, full-day training and technical assistance session coordinated by BCAEO. The Academy will also include supplemental virtual and/or recorded video training materials. Topics will include items identified by the process described in section 3.4 below, ongoing discussions with the CAA network, and trends from BCAEO monitoring. Goal 2: BCAEO will reestablish the full ROMA collaborative. As BCAEO and the CAA network has transitioned to a new statewide data solution, a subcommittee of the ROMA Collaborative - the Data Solutions Workgroup became the primary focus of the Collaborative. Cooperatively with the Collaborative's leadership, BCAEO will clarify the groups purpose and mission, encourage participation from all CAAs, and create consistent meeting cadence and calendar of meetings (tentatively quarterly, 4 per year, but ultimately TBD by consensus of the Collab.). Goal 3: By the end of FY26, BCAEO will increase the number of CAAs utilizing advanced reporting/analytics features in the statewide data solution. BCAEO is working with CAAs to prepare for the FY24 CSBG Annual Report, which will be the first year in the new statewide data solution. During FYs25-26, BCAEO will provide training on the advanced reporting and capabilities with the goal of increasing the number of CAAs utilizing this functionality.

3.3. State Plan Development:

Indicate the information and input the state accessed to develop this State Plan.

3.3a. Analysis of state-level tools *[Check all that apply and provide additional information where applicable]*



State Performance Indicators and/or National Performance Indicators (NPIs)



U.S. Census data



State Performance Management Data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)



Monitoring Visits/Assessments



Tools Not Identified Above (specify)

BCAEO analyzes each CAA's annual CSBG service plan and budget that describes their goals, strategies, and objectives for the upcoming fiscal year. These plans are used to inform and focus the work of BCAEO and MDHHS at the beginning of each fiscal year. BCAEO reviews the results of monitoring reviews (program, financial, and organizational standards) to identify trends for training and technical assistance needs.

3.3b. Analysis of local-level tools *[Check all that applies and provide additional information where applicable]*



Eligible Entity Community Needs Assessments



Eligible Entity Community Action Plans



Public Hearings/Workshops



Tools Not Identified Above (e.g., State required reports)[specify]

BCAEO reviews local-level information during Organizational Standards reviews. At least once annually, BCAEO reviews each agency's Community Needs Assessment, and BCAEO has created a statewide Community Needs Assessment website which hosts quantitative and qualitative data for both state and local level information. CAAs input data in real-time into the statewide database which BCAEO reviews through a variety of reports, which informs decision-making and adjustments.

3.3c. Consultation with *[Check all that applies and provide additional information where applicable]*



Eligible Entities (e.g., meetings, conferences, webinars; not including the public hearing)



State Association



National Association for State Community Services Programs (NASCSPP)



Community Action Partnership (NCAP)



Community Action Program Legal Services (CAPLAW)



CSBG Tribal Training and Technical Assistance (T/TA) provider



Regional Performance Innovation Consortium (RPIC)



Association for Nationally Certified ROMA Trainers (ANCRT)

Section 4: CSBG Hearing Requirements

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SECTION 4 CSBG Hearing Requirements

4.1. Public Inspection:

Describe the steps taken by the state to disseminate this State Plan to the public for review and comments prior to the public hearing, as required under Section 676(e)(2) of the Act.

BCAEO worked with MDHHS Communications and followed MDHHS procedures for public notices. The public notice included all relevant information, including how to obtain a copy of the draft State Plan, the availability of the State Plan online, the physical and virtual details of Public Hearing, and the Public Comment Period which was open July 3 - August 9, 2024. The public notice was made via newspaper and via the BCAEO website, www.michigan.gov/BCAEO. BCAEO also made the public notice available to CAAs via communications with CAAs via the BCAEO's monthly electronic newsletter and via the BCAEO's SharePoint site.

4.2. Public Notice/Hearing:

Describe how the state ensured there was sufficient time and statewide distribution of notice of the public hearing(s) to allow the public to comment on the State Plan, as required under Section 676(a)(2)(B) of the CSBG Act.

BCAEO worked with MDHHS Communications and followed MDHHS procedures for public notices with instructions on how the draft State Plan was available on www.michigan.gov/BCAEO or how it could be obtained via email. The public notice described clearly how to send comments via email, how to identify comments via the subject line via email, and the date through which comments would be accepted (August 9, 2024). The public notice was posted on July 3, 2024 and the public hearing was conducted with a virtual and in-person option on July 22, 2024 to maximize options for participation.

4.3. Public and Legislative Hearings:

In the table below, specify the date(s) and location(s) of the public and legislative hearing(s) held by the designated lead agency for this State Plan, as required under Section 676(a)(2)(B) and Section 676(a)(3) of the Act.

	Date	Location	Type of Hearing [Select an option]	If a combined hearing was held, confirm that the public was invited
1	07/22/2024	Lansing Michigan and GoTo Webinar	Public	<input type="checkbox"/>
2	07/30/2024	Lansing Michigan	Legislative	<input type="checkbox"/>

NOTE : States can add rows as needed for each hearing as needed

4.4. Attach supporting documentation or a hyperlink for the public and legislative hearings.

Public hearing link: <https://register.gotowebinar.com/register/1652243159833573983> Legislative: <https://www.legislature.mi.gov/Bills/Bill?ObjectName=2024-SB-0747> Legislative, section 104 Community Services Block Grant <https://www.legislature.mi.gov/documents/2023-2024/publicact/pdf/2024-PA-0121.pdf>

Section 5: CSBG Eligible Entities

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SECTION 5 CSBG Eligible Entities

5.1. CSBG Eligible Entities:

In the table below, indicate whether each eligible entity in the state, is public or private, the type(s) of entity, and the geographical area served by the entity.

Note: Table 5.1 pre-populates the Annual Report, Module 1, Table C.1.

Types of Entities include Community Action Agency, Limited Purpose Agency, Local Government Agency, Migrant or Seasonal Farmworker Organization, Tribe or Tribal Organization, and Other

#	CSBG Eligible Entity	Geographical Area Served by county (Provide all counties)	Public or Nonprofit	Type of Entity [choose all that apply]
1	Allegan County Resource Development Committee Inc	Allegan county	Non-Profit	Community Action Agency
2	Kent, County of (Inc)	Kent county	Public	Community Action Agency
3	Baraga-Houghton-Keweenaw Community Action Agency, Inc	Baraga, Houghton, Keweenaw counties	Non-Profit	Community Action Agency
4	Blue Water Community Action	St. Clair county	Non-Profit	Community Action Agency
5	Capital Area Community Services Incorporated	Eaton, Clinton, Shiawassee, Ingham counties	Non-Profit	Community Action Agency
6	Chippewa Luce Mackinac	Chippewa, Luce, Mackinac counties	Non-Profit	Community Action Agency
7	Community Action Agency of South Central Michigan, The	Barry, Branch, Calhoun, St. Joseph, Kalamazoo counties	Non-Profit	Community Action Agency
8	Dickinson Iron Community Services Agency	Dickinson, Iron counties	Non-Profit	Community Action Agency
9	EightCAP Inc	Montcalm, Ionia, Isabella, Gratiot counties	Non-Profit	Community Action Agency
10	Alger Marquette Community Action Board	Alger, Marquette counties	Non-Profit	Community Action Agency
11	Community Action Agency	Jackson, Lenawee, Hillsdale counties	Non-Profit	Community Action Agency
12	FiveCAP Inc	Manistee, Mason, Lake, Newaygo counties	Non-Profit	Community Action Agency
13	Genesee, County of	Genesee county	Public	Community Action Agency
14	Gogebic-Ontonagon Community Action	Gogebic, Ontonagon counties	Non-Profit	Community Action Agency
15	Human Development Commission Inc	Sanilac, Tuscola, Huron, Lapeer counties	Non-Profit	Community Action Agency
16	Macomb, County of	Macomb county	Public	Community Action Agency
17	Human Resources Authority Inc	Menominee, Delta, Schoolcraft counties	Non-Profit	Community Action Agency
18	Mid Michigan Community Action Agency Inc	Gladwin, Mecosta, Osceola, Clare, Bay, Midland, Muskegon, Oceana counties	Non-Profit	Community Action Agency
19	Monroe County Opportunity Program, Inc	Monroe county	Non-Profit	Community Action Agency
20	Northeast Michigan Community Service Agency Inc	Alpena, Cheboygan, Otsego Crawford, Oscoda, Alcona, Ogemaw, Iosco, Arenac, Presque Isle, Montmorency counties	Non-Profit	Community Action Agency
21	Northwest Michigan Community Action Agency Inc	Emmet, Charlevoix, Antrim, Kalkaska, Missaukee, Wexford, Roscommon, Grand Traverse, Benzie, Leelanau counties	Non-Profit	Community Action Agency
22	Oakland Livingston Human Services Agency	Oakland, Livingston counties	Non-Profit	Community Action Agency
23	Ottawa, County of	Ottawa county	Public	Community Action Agency
24	Saginaw County Community Action Committee	Saginaw county	Non-Profit	Community Action Agency
25	Southwest Michigan Community Action Agency	Cass, Berrien, Van Buren counties	Non-Profit	Community Action Agency

26	Washtenaw, County of	Washtenaw county	Public	Community Action Agency
27	Wayne Metropolitan Community Action Agency	Wayne county	Non-Profit	Community Action Agency

5.2. Total number of CSBG eligible entities 27

5.3. Changes to Eligible Entities List:
Within the tables below, describe any changes that have occurred to the Eligible Entities within the state since the last federal fiscal Year (FFY), as applicable.

One or more of the following changes were made to the eligible entity list: [Check all that apply].

☐ Designation and/or Re-Designation
☐ De-Designations and/or Voluntary Relinquishments
☐ Mergers
☒ No Changes to Eligible Entities List

5.3a. Designation and Re-Designation: Identify any new entities that have beendesignated as eligible entities, as defined under Section 676A of the Act, since the last federal fiscal year.Include any eligible entities designated to serve an area previously not served by CSBG as well as any entities designated to replace another eligible entity that was terminated (de-designated) or that voluntarily relinquished its status as a CSBG eligible entity.

CSBG Eligible Entity	Type	Start Date	Geographical Area Served	Delete

5.3b. Designation and Voluntary Relinquishments: Identify any entities that are no longer receiving CSBG funding. Include any eligible entities that have been terminated (de-designated) as defined under Section 676(c) and Section 676C of the Act, or voluntarily relinquished their CSBG eligible entity status since the last Federal Fiscal Year (FFY). Include any eligible entities designated to serve an area previously not served by CSBG as well as any entities designated to replace another eligible entity that was terminated (de-designated)

CSBG Eligible Entity	Reason	Delete

5.3c. Mergers: In the table below, provide information about any mergers or other combinations of two or more eligible entities that were individually listed in the prior State Plan.

Original CSBG Eligible Entities	Surviving CSBG Eligible Entity	New Name (as applicable)	DUNS No.	Delete

Section 6: Organizational Standards for Eligible Entities

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration for Children and Families Community Services Block Grant (CSBG)	Form Approved OMB No: 0970-0382 Expires: 09/30/2025
SECTION 6 Organizational Standards for Eligible Entities	
Note: Reference IM 138, <i>State Establishment of Organizational Standards for CSBG Eligible Entities</i>, for more information on Organizational Standards. Click HERE for IM 138.	
6.1. Choice of Standards: Confirm whether the state will implement the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138) or an alternative set during the federal fiscal year(s) of this planning period	
<input checked="" type="radio"/> COE CSBG Organizational Standards <input type="radio"/> Modified version of COE CSBG Organizational Standards <input type="radio"/> Alternative set of Organizational Standards	
6.1a. Modified Organizational Standards: In the case that the state is requesting to use modified COE-developed organizational standards, provide the proposed modification for the FFY of this planning period including the rationale.	
N/A	
6.1b. Alternative Organizational Standards: If using an alternative set of organizational standards, attach the complete list of alternative organizational standards.	
6.1c. Alternative Organizational Standards Changes: If using an alternative set of organizational standards: 1) provide any changes from the last set provided during the previous State Plan submission; 2) describe the reasons for using alternative standards; and 3) describe how they are at least as rigorous as the COE- developed standards	
<input checked="" type="radio"/> There were no changes from the previous State Plan submission	
Provide reason for using alternative standards N/A	
Describe rigor compared to COE-developed Standards N/A	
6.2. Implementation: Check the box that best describes how the state officially adopt(ed) organizational standards for eligible entities in the state in a manner consistent with the state's administrative procedures act. If "Other" is selected, provide a timeline and additional information, as necessary. <i>[Check all that apply and narrative where applicable]</i>	
<input type="checkbox"/> Regulation	
<input checked="" type="checkbox"/> Policy	
<input checked="" type="checkbox"/> Contracts with eligible entities	
<input type="checkbox"/> Other, describe:	
N/A	
6.3. Organizational Standards Assessment: Describe how the state assess eligible entities against organizational standards this federal fiscal year(s). <i>[Check all that apply.]</i>	
<input type="checkbox"/> Peer-to-peer review (<i>with validation by the State or state-authorized third party</i>)	
<input type="checkbox"/> Self-assessment (<i>with validation by the State or state-authorized third party</i>)	
<input type="checkbox"/> Self-assessment/peer review with state risk analysis	
<input type="checkbox"/> State-authorized third party validation	
<input type="checkbox"/> Regular, on-site CSBG monitoring	
<input checked="" type="checkbox"/> Other	
6.3a. Assessment Process: Describe the planned assessment process.	
<p>In order to maintain consistency in the assessment of organizational standards, one BCAEO staff person is responsible for all organizational standards reviews. The assessment steps are as follows: 1. BCAEO notifies the agency about the organizational standards review. 2. Agency receives instructions on uploading documents by Org Standard into the External SharePoint site hosted on the state of Michigan server. (We are working with the vendor of our new statewide database, empowOR, to change from SharePoint to empowOR, but the timeline has not been finalized. We are hopeful the transition will occur during the timeframe of the FY25-26 State Plan) 3. BCAEO conducts an entrance conference to provide the agency with the scope of the review. 4. BCAEO reviews each document for the components listed in the organizational standards monitoring tool to ensure the organization standard has been met. a.) Met standards are marked met b.) Standards that have not been met and do not contain the required components are marked not met. c.) Standards that are being worked on are marked in-progress in the monitor's field notes and a follow-up is conducted at the time they were anticipated to be completed. d.) Notes are stored in an internal database. 5. The status of the standard is indicated in the monitoring report. Standards that were not met generally require a Corrective Action Plan (CAP). Agencies that cannot correct the finding within 30 days or have a repeated unmet standard from a previous monitoring will be placed on a Technical Assistance Plan. Failure to comply with the TAP will require additional monitoring to determine the causes of the failure. This may lead to a Quality Improvement Plan.</p>	
6.4. Eligible Entity Exemptions: Will the state make exceptions in applying the organizational standards for certain eligible entities due to special	

circumstances or organizational characteristics (as described in IM 138)? <input type="radio"/> Yes <input checked="" type="radio"/> No			
6.4a. Provide the specific eligible entities the state will exempt from meeting organizational standards, and provide a description and a justification for each exemption			
Total Number of Exempt Entities: 0			
CSBG Eligible Entity		Description / Justification	Delete
6.5. Performance Target: Provide the percentage of eligible entities that the state expects to meet all the state-adopted organizational standards for FFY(S) for this planning period			
Year One	93%	Year Two	93%
<i>Note: Item 6.5 is associated with State Accountability Measures 6Sa and prepopulate the Annual report, Module I, Table D.2.</i>			

Section 7: State Use of Funds

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

Form Approved
OMB No: 0970-0382
Expires:09/30/2025

SECTION 7 State Use of Funds

Eligible Entity Allocation (90 Percent Funds) [Section 675C(a) of the CSBG Act]

7.1. Formula:

Select the method (formula) that best describes the current practice for allocating CSBG funds to eligible entities.

- ☐ Historic
- ☒ Base + Formula
- ☐ Formula Alone
- ☐ Formula with Variables
- ☐ Hold Harmless + Formula
- ☐ Other

7.1a. Formula Description: Describe the current practice for allocating CSBG funds to eligible entities.

(a) A base allocation of \$25,000 for each Community Action Agency (CAA). (b) Remaining Funds: 84 percent: Based on each CAA's relative share of the number of persons with income below 125% of the poverty level. 10 percent: Based on each CAA's relative share of the excess number of persons with income below 125% of the poverty level. Excess poverty is defined as the number of persons with income below 125% of the poverty level in excess of the statewide average of 14 percent. 6 percent: Based on each CAA's relative share of the extreme poverty level. Extreme poverty is defined as the number of persons with income 125% of the poverty level in excess of 25 percent.

7.1b. Statute: Does a state statutory or regulatory authority specify the formula for allocating "not less than 90 percent" funds among eligible entities? ☒ Yes ☐ No

7.2. Planned Allocation:

Specify the percentage of your CSBG planned allocation that will be funded to eligible entities and "not less than of 90 percent funds" as described under Section 675C(a) of the CSBG Act.

In the table, provide the planned allocation for each eligible entity receiving funds for the fiscal year(s) covered by this plan.

Note: This information pre-populates the state's Annual Report, Module 1, Table E.2.

Year One	90.00%	Year Two	90.00%
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Planned CSBG 90 Percent Funds

CSBG Eligible Entity	Year One Funding Amount \$	Delete
Allegan County Resource Development Committee Inc	\$232,175	
Kent, County of (Inc)	\$1,247,331	
Baraga-Houghton-Keweenaw Community Action Agency, Inc	\$186,606	
Blue Water Community Action	\$315,045	
Capital Area Community Services Incorporated	\$1,220,003	
Chippewa Luce Mackinac	\$162,919	
Community Action Agency of South Central Michigan, The	\$1,375,680	
Dickinson Iron Community Services Agency	\$89,619	
EightCAP Inc	\$866,805	
Alger Marquette Community Action Board	\$149,305	
Community Action Agency	\$656,932	
FiveCAP Inc	\$323,549	
Genesee, County of	\$1,264,077	
Gogebic-Ontonagon Community Action	\$93,294	
Human Development Commission Inc	\$472,966	
Macomb, County of	\$1,247,331	
Human Resources Authority Inc	\$171,650	
Mid Michigan Community Action Agency Inc	\$1,378,527	
Monroe County Opportunity Program, Inc	\$232,175	
Northeast Michigan Community Service Agency Inc	\$551,327	
Northwest Michigan Community Action Agency Inc	\$635,470	
Oakland Livingston Human Services Agency	\$1,723,832	

Ottawa, County of	\$377,197	
Saginaw County Community Action Committee	\$611,551	
Southwest Michigan Community Action Agency	\$706,407	
Washtenaw, County of	\$625,807	
Wayne Metropolitan Community Action Agency	\$8,421,075	
Total		\$25,338,655

CSBG Eligible Entity Year Two		
CSBG Eligible Entity	Year Two Funding Amount \$	Delete
Allegan County Resource Development Committee Inc	\$232,175	
Kent, County of (Inc)	\$1,247,331	
Baraga-Houghton-Keweenaw Community Action Agency, Inc	\$186,606	
Blue Water Community Action	\$315,045	
Capital Area Community Services Incorporated	\$1,220,003	
Chippewa Luce Mackinac	\$162,919	
Community Action Agency of South Central Michigan, The	\$1,375,680	
Dickinson Iron Community Services Agency	\$89,619	
EightCAP Inc	\$866,805	
Alger Marquette Community Action Board	\$149,305	
Community Action Agency	\$656,932	
FiveCAP Inc	\$323,549	
Genesee, County of	\$1,264,077	
Gogebic-Ontonagon Community Action	\$93,294	
Human Development Commission Inc	\$472,966	
Macomb, County of	\$1,247,331	
Human Resources Authority Inc	\$171,650	
Mid Michigan Community Action Agency Inc	\$1,378,527	
Monroe County Opportunity Program, Inc	\$232,175	
Northeast Michigan Community Service Agency Inc	\$551,327	
Northwest Michigan Community Action Agency Inc	\$635,470	
Oakland Livingston Human Services Agency	\$1,723,832	
Ottawa, County of	\$377,197	
Saginaw County Community Action Committee	\$611,551	
Southwest Michigan Community Action Agency	\$706,407	
Washtenaw, County of	\$625,807	
Wayne Metropolitan Community Action Agency	\$8,421,075	
Total		\$25,338,655

7.3. Distribution Process:
Describe the specific steps in the state's process for distributing 90 percent funds to the eligible entities and include the number of days each step is expected to take; include information about state legislative approval or other types of administrative approval (such as approval by a board or commission).

All eligible entities (CAAs) requesting CSBG funds submit a Community Action Plan (CAP) and expenditure plan in the format prescribed by the state (usually due within four weeks of receiving the request from MDHHS). BCAEO reviews the CAP and expenditure plan prior to approval. All CAA plans must demonstrate a planning process that incorporates participation of the target client groups, other social service agencies and coordination with local governments. Programs are reviewed for consistency with the proposed expenditure plan. CAAs are required to conduct at least one local public hearing or providing for a public comment period to allow low-income persons, community organizations, and other interested parties the opportunity to participate in formulating the agencies' applications. CAAs provide documentation in their plans that such a hearing or comment period was scheduled and maintain a record of all testimony and/or comments received. The annual CSBG Grant Agreements include general provisions that the CAA must abide by to receive funds. The provisions cover issues such as: audit requirements, insurance coverage, compliance with state and federal laws and regulations, confidentiality, termination, submission of board minutes, etc. It also includes the following assurances/documents: Governing Board Assurances; Certification Regarding Lobbying; and Certification Regarding Debarment, Suspension and other Responsibility Matters - Primary Covered Transactions. A signed Agreement must be on file prior to disbursing funds at the beginning of each CSBG program year (October 1). After BCAEO review and approval, BCAEO returns the CAP and expenditure plan with a completed Statement of Expenditure template that CAAs submit to request reimbursement for their expenditures. During this time, the MDHHS Bureau of Grants and Purchasing processes the grants in EGrAMS to be routed for electronic approvals and required signatures. Prior to the beginning of the fiscal year (October 1), program requirements are updated and distributed in the MDHHS Community Services Policy Manual. Because we do not have our official allocation until after agreements are in place, the CAA expenditure plans begin with a planning allocation based on the previous fiscal year's final allocation. Once the final allocation is received by the state office, amendments to the agreements and CAA plans are processed to reflect the final allocation. The full 90% allocation is distributed in year one, and agreements are in place for year two for any unspent funding.

7.3a Distribution Method: Select the option below that best describes the distribution method the state uses to issue CSBG funds to eligible entities:

☒ Reimbursement

☐ Advance

<input type="radio"/> Hybrid		
<input type="radio"/> Other		
Eligible Entities are able to request an advance that is equivalent to 60 days of their allocation that is accessible for the duration of the grant. Once the grant closes, payback is generally facilitated via deductions from requested payments. This is part of the contract language and stipulations of requesting an advance. Advances are approved and administered by the MDHHS Accounting Office.		
7.4. Distribution Timeframe: Does the state plan to make funds available to eligible entities no later than 30 calendar days after OCS distributes the federal award? <input checked="" type="radio"/> Yes <input type="radio"/> No		
7.4a. Distribution Consistency: If no, describe state procedures to ensure funds are made available to eligible entities consistently and without interruption.		
<i>Note: Item 7.4 is associated with State Accountability Measure 2Sa and may prepopulate the state's annual report form.</i>		
7.5. Distribution of Funds Performance Management Adjustment: Describe the state's strategy for improving grant and/or contract administration procedures under this State Plan as compared to past plans. Any improvements should be based on analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any improvements, provide further detail.		
<i>Note: This information is associated with State Accountability Measure 2Sb and may prepopulate the state's annual report form.</i>		
BCAEO prioritizes processes and procedures related to distribution of funds to ensure CAAs have resources to meet local needs. Since March, 2020, most BCAEO staff have moved to fully remote work, and BCAEO has implemented electronic workflow and approval procedures in SharePoint for contract management and reimbursement requests. Electronic workflows for documents and processes such as Community Action Plans and expenditure plans, line item transfer requests, equipment waivers, and other documents that require review are reviewed and updated at least annually. In April, 2024, BCAEO released planning service plans and expenditure plans for all grants to CAAs, which is several months earlier than previous fiscal years. Due to the increased funding BCAEO has received from State and Federal partners, there are additional grant applications for CAAs to complete and for BCAEO to review and approve. Thus, BCAEO provided additional time to CAAs to work on the materials and to BCAEO staff to review and approve. Preliminary feedback on this approach has been positive. BCAEO is committed to ensuring that funding is always moving through our office to CAAs and will continue to adjust as needed to make that happen.		
Administrative Funds [Section 675C(b)(2) of the CSBG Act]		
<i>Note: This information pre-populates the state's Annual Report, Module 1, Table E.4.</i>		
7.6. Allocated Funds: Specify the percentage of your CSBG planned allocation for administrative activities for the FFY(s) covered by this State plan.		
Year One (0.00%)	5.00	Year Two (0.00%) 5.00
7.7. State Staff: Provide the number of state staff positions to be funded in whole or in part with CSBG funds for the FFY(s) covered by this State Plan		
Year One	24.00	Year Two 24.00
7.8. State FTEs: Provide the number of state Full Time Equivalents (FTEs) to be funded with CSBG funds for the FFY(s) covered by this State Plan		
Year One	12.00	Year Two 12.00
7.9. Remainder/Discretionary Funds Use: Does the state have remainder/discretionary funds, as described in Section 675C(b)(1) of the CSBG Act? <input checked="" type="radio"/> Yes <input type="radio"/> No		
If yes, provide the allocated percentage and describe the use of the remainder/discretionary funds in the table below.		
Year One (0.00%)	5.00%	Year Two (0.00%) 5.00%
Use of Remainder/Discretionary Funds (See Section 675C(b)(1) of the CSBG Act)		
<i>Note: This response will link to the corresponding assurance, Item 14.2.</i>		
<i>If a funded activity fits under more than one category in the table, allocate the funds among the categories. For example, if the state provides funds under a contract with the State Community Action association to provide training and technical assistance to eligible entities and to create a statewide data system, the funds for that contract should be allocated appropriately between Items 7.9a. - 7.9c. If allocation is not possible, the state may allocate the funds to the main category with which the activity is associated.</i>		
<i>Note: This information is associated with State Accountability Measures 3Sa and pre-populates the annual report Module 1, Table E.7.</i>		
Remainder/Discretionary Fund Uses	Year One Planned \$	Brief description of services/activities and/or activities
7.9a. Training/technical assistance to eligible entities	\$75,000.00	These planned services/activities will be described in State Plan Item 8.1.
7.9b. Coordination of state-operated programs and/or local programs	\$0.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.

7.9c. Statewide coordination and communication among eligible entities	\$718,820.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need	\$346,607.00	Small agency minimum amount
7.9e. Asset-building programs	\$0.00	
7.9f. Innovative programs/activities by eligible entities or other neighborhood groups	\$177,276.00	Reserved to support innovative programs.
7.9g. State charity tax credits	\$0.00	
7.9h. Other activities, specify in column 3	\$90,000.00	Native American Grants
Total	\$1,407,703.00	
Remainder/Discretionary Fund Uses	Year Two Planned \$	Brief description of services/activities
7.9a. Training/technical assistance to eligible entities	\$75,000.00	These planned services/activities will be described in State Plan Item 8.1.
7.9b. Coordination of state-operated programs and/or local programs	\$0.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9c. Statewide coordination and communication among eligible entities	\$718,820.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need	\$346,607.00	Small agency minimum amount
7.9e. Asset-building programs	0	
7.9f. Innovative programs/activities by eligible entities or other neighborhood groups	\$177,276.00	Reserved to support innovative programs.
7.9g. State charity tax credits	\$0.00	
7.9h. Other activities, specify in column 3	\$90,000.00	Native American Grants
Total	\$1,407,703.00	
7.10. Remainder/Discretionary Funds Partnerships: Select the types of organizations, if any, the State Plans to work with (by grant or contract using remainder/discretionary funds) to carry out some or all of the activities in table 7.9. [Check all that apply and narrative where applicable]		
<input type="checkbox"/> The state directly carries out all activities (No Partnerships)		
<input checked="" type="checkbox"/> The state partially carries out some activities		
<input checked="" type="checkbox"/> CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds) 27		
<input checked="" type="checkbox"/> Other community-based organizations		
<input checked="" type="checkbox"/> State Community Action association		
<input type="checkbox"/> Regional CSBG technical assistance provider(s)		
<input type="checkbox"/> National technical assistance provider(s)		
<input checked="" type="checkbox"/> Individual consultant(s)		
<input checked="" type="checkbox"/> Tribes and Tribal Organizations		
<input type="checkbox"/> Other		
Note: This response will link to the corresponding CSBG assurance, item 14.2.		
7.11. Use of Remainder/Discretionary Funds Performance Management Adjustment: Describe any adjustments the state will make to the use of remainder/discretionary funds under this State Plan as compared to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.		
Note: This information is associated with State Accountability Measures 3Sb, and may pre-populate the State's annual report form.		
In FYs 25-26, small agencies will receive discretionary funds to provide a minimum amount of \$200,000 in CSBG funding. Calculation: CSBG 90% small agency allocation + CSBG Discretionary funds = \$200,000. BCAEO meets quarterly with the small agencies to make sure they are able to meet the needs of their communities. BCAEO, through a state procurement process, has purchased a new statewide data system to improve CAA network performance, track results, enhance reporting, and assist in decision making. The costs for the prior statewide system were paid by the agencies through their CSBG 90% allocation. The new state data system will be purchased and maintained with CSBG discretionary funds. Additional CSBG discretionary funds will be used to support two data positions to implement, convert, and support of the new data system. Any unobligated funds for the new data system will be used to support competitive CAA grants to support innovative programs.		

Section 8: State Training and Technical Assistance

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
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SECTION 8 State Training and Technical Assistance

8.1. Training and Technical Assistance Plan: Describe the State's plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan by completing the table below. The T/TA plan should include all planned CSBG T/TA activities funded through the administrative or remainder/discretionary funds of this CSBG award (as reported in Section 7). The CSBG T/TA plan should include training and technical assistance conducted directly by the state or through partnerships (as specified in 8.3). Add a row for each activity: indicate the timeframe; whether it is training, technical assistance, or both; and the topic.

Note: This information is associated with State Accountability Measure 3Scand pre-populates the Annual Report, Module 1, Table F.1.

Training and Technical Assistance - Year One

	Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
1	FY1-Q4	Training	Other	Annual conference, multiple topics
2	Ongoing / Multiple Quarters	Both	Governance/Tripartite Boards	
3	Ongoing / Multiple Quarters	Both	Communication	
4	All quarters	Training	Other	Leadership Development Institute
5	Ongoing / Multiple Quarters	Both	Community Assessment	
6	Ongoing / Multiple Quarters	Training	ROMA	
7	Ongoing / Multiple Quarters	Both	Organizational Standards - General	
8	Ongoing / Multiple Quarters	Both	Fiscal	
9	All quarters	Both	Reporting	
10	Ongoing / Multiple Quarters	Both	Monitoring	
11	All quarters	Both	Technology	
12	Ongoing / Multiple Quarters	Both	Other	Peer networking and best practice sharing
13	Ongoing / Multiple Quarters	Both	Other	Diversity, Equity, and Inclusion
14	Ongoing / Multiple Quarters	Both	Other	Anti-poverty programs, tools, and strategies

Training and Technical Assistance - Year Two

	Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
1	FY2-Q4	Training	Other	Annual conference, multiple topics
2	Ongoing / Multiple Quarters	Both	Governance/Tripartite Boards	
3	Ongoing / Multiple Quarters	Both	Communication	
4	All quarters	Training	Other	Leadership Development Institute
5	Ongoing / Multiple Quarters	Both	Community Assessment	
6	Ongoing / Multiple Quarters	Training	ROMA	
7	Ongoing / Multiple Quarters	Both	Organizational Standards - General	
8	Ongoing / Multiple Quarters		Fiscal	
9	All quarters		Reporting	
10	Ongoing / Multiple Quarters		Monitoring	
11	All quarters		Technology	
12	Ongoing / Multiple Quarters		Other	Peer networking and best practice sharing
13	Ongoing / Multiple Quarters		Other	Diversity, Equity, and Inclusion
14	Ongoing / Multiple Quarters		Other	Anti-poverty programs, tools, and strategies

8.1a. Training and Technical Assistance Budget: The planned budget for the training and technical assistance plan (*as indicated in the Remainder/Discretionary Funds table in item 7.9*):

Year One	\$75,000	Year Two	\$75,000
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8.1b. Training and Technical Assistance Collaboration: Describe how the state will collaborate with the state association and other stakeholders in the planning and delivery of training and technical assistance.	
The state office has a training grant with Michigan Community Action (MCA) to provide training and technical assistance to the eligible entities. BCAEO and MCA work together to create an annual training plan for MCA to administer. Additional trainings are delivered as needed to agencies not meeting certain requirements revealed in monitoring engagements or other means of discovery. BCAEO supports the MCAs annual conference. MCA also coordinates with BCAEO to create the RPIC training report.	
8.2. Organizational Standards Technical Assistance: Does the state have Technical Assistance Plans (TAPs) in place for all eligible entities with unmet organizational standards, if appropriate? <input checked="" type="radio"/> Yes <input type="radio"/> No	
<i>Note: 8.2 is associated with State Accountability Measure 6Sb. The state should put a TAP in place to support eligible entities with one or more unmet organizational standards.</i>	
8.2a. Address Unmet Organizational Standards: Describe the state's plan to provide T/TA to eligible entities to ensure they address unmet Organizational Standards. Any CAA with unmet organizational standards is placed on a TAP that includes clear timelines, deliverables, and training and technical assistance to be provided to the agency. BCAEO staff work with the CAA and follow up on due dates and deliverables as appropriate and ensure training and technical assistance are provided per the TAP.	
8.3. Training and Technical Assistance Organizations: Indicate the types of organizations through which the State Plans to provide training and/or technical assistance as described in item 8.1, and briefly describe their involvement. <i>[Check all that apply.]</i>	
<input type="checkbox"/> All T/TA is conducted by the state	
<input type="checkbox"/> CSBG eligible entities <i>(if checked, provide the expected number of CSBG eligible entities to receive funds)</i>	
<input type="checkbox"/> Other community-based organizations	
<input checked="" type="checkbox"/> State Community Action association	
<input type="checkbox"/> Regional CSBG technical assistance provider(s)	
<input checked="" type="checkbox"/> National technical assistance provider(s)	
<input checked="" type="checkbox"/> Individual consultant(s)	
<input type="checkbox"/> Tribes and Tribal Organizations	
<input type="checkbox"/> Other	
8.4.CSBG-Funded T/TA Performance Management Adjustment: Describe adjustments the state made to the training and technical assistance plan under this State Plan as compared to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.	
<i>Note: This information is associated with State Accountability Measures 3Sd may pre-populate the state's annual report form</i>	
Key components of the training plan that have been successful and valued by the CAA network will remain in place, such as the annual conference, consistent virtual training and technical assistance, and a library of recorded training sessions. In FYs 25-26, BCAEO intends to expand training in two main areas. First, as the CAA network continues to gain familiarity and experience with the statewide data system, BCAEO (in partnership with the software vendor when appropriate) will provide training on advanced reporting and analytics capabilities and how those features can be leveraged to better serve program participants and reduce the causes and conditions of poverty as a result. Second, BCAEO intends to expand training opportunities and tools related to anti-poverty programs and strategies in Michigan, regionally, and nationally, which is connected directly to our anti-poverty goal as a state office.	

Section 9: State Linkages and Communication

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SECTION 9 State Linkages and Communication

Note: This section describes activities that the state may support with CSBG remainder/discretionary funds, described under Section 675C(b)(1) of the CSBG Act. The state may indicate planned use of remainder/discretionary funds for linkage/communication activities in Section 7, State Use of Funds, items 7.9(b) and (c).

9.1. State Linkages and Coordination at the State Level:

Describe the linkages and coordination at the state level that the state intends to create or maintain to ensure increased access to CSBG services to low-income people and communities under this State Plan and avoid duplication of services (as required by the assurance under Section 676(b)(5)).

Describe additional information as needed.

Note: This response will link to the corresponding CSBG assurance, item 14.5. In addition, this item is associated with State Accountability Measure 7Sa and pre-populates the Annual Report, Module 1, Item G.1.

- ☒ State Low Income Home Energy Assistance Program (LIHEAP) office
- ☒ State Weatherization office
- ☒ State Temporary Assistance for Needy Families (TANF) office
- ☐ Head Start State Collaboration offices
- ☒ State public health office
- ☒ State education department
- ☐ State Workforce Innovation and Opportunity Act (WIOA) agency
- ☒ State budget office
- ☒ Supplemental Nutrition Assistance Program (SNAP)
- ☐ State child welfare office
- ☒ State housing office
- ☒ Other

BCAEO also links with Emergency Management, the Michigan State Police, and interagency efforts such as the Social Determinants of Health Strategy and the Michigan Poverty Task Force. BCAEO collaborates with MI 2-1-1, a service any Michigan Resident can call or text to find assistance in their area, to ensure CAAs and their services are in the system. BCAEO collaborates with MI Bridges, the State of Michigan's online system for applying for benefits, to ensure CAAs are listed in the system as referral partners and that CAA staff are trained as Navigators (Navigators can assist applicants through the application process). During the period covered by this State Plan, BCAEO will focus on expanding utilization of the new statewide data system, which will increase access to services throughout the state, ensure deduplication of CAA data, programs, and services, and link CAA programs and services with like-minded organizations in the state. During the previous two fiscal years (FYs 23-24), BCAEO focused on migrating the CAA network to the system, training system administrators and users, etc. BCAEO will convene monthly system administrator meetings to provide training and technical assistance and to promote adoption of advanced reporting and analytics features of the data solution that can be used to inform service delivery, program design, strategic planning, the ROMA process as a whole, etc.

9.2. State Linkages and Coordination at the Local Level:

Describe how the state is encouraging partnerships and collaborations at the state level with public and private sector organizations, to assure the effective delivery and coordination of CSBG services to transform low-income communities and avoid duplication of services (as required by assurances under Sections 676(b)(5) - (6))

Note: This response will link to the corresponding CSBG assurances, items 14.5 and 14.6., and pre-populates the Annual Report, Module 1, Item G.2.

BCAEO encourages partnerships and collaborations at the state level with public and private sector organizations, to assure the effective delivery and coordination of CSBG services to transform low-income communities and avoid duplication of services in several ways. BCAEO intends to re-engage the CAA network through the coordination of in-person meetings/workgroups that have been paused and/or repurposed. BCAEO and the CAA network identified increasing the number of in-person meetings, especially regionally when applicable, as a way to improve collaboration during the State Plan planning process. Two specific types of in-person meetings are in the planning phase. First, prior to the pandemic restrictions on in-person meetings, BCAEO conducted one-day trainings entitled BCAEO Academies which received positive feedback from the CAA network and covered various topics related to grant administration, policies and procedures, technology, and more. Second is the ROMA Collaborative. When planning began for the statewide database that is now in place, a smaller workgroup was created from the larger ROMA Collaborative to guide the search for a new statewide database. Since that time, the larger work of the ROMA Collaborative has been less consistent and mostly virtual, due to the focus on the data solution and the restrictions created by the pandemic. Other ideas were identified during the planning process but are very early in the brainstorming phase and will be implemented based on further collaborative planning.

9.3. Eligible Entity Linkages and Coordination

9.3a. State Assurance of Eligible Entity Linkages and Coordination: Describe how the state will assure that eligible entities will partner and collaborate with public and private sector organizations to assure the effective delivery and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by the assurance under Section 676(b)(5)).

Note: This response will link to the corresponding CSBG assurance, item 14.5. and pre-populates the Annual

Report, Module 1, Item G.3a.

BCAEO requires each CAA to submit a Community Action Plan (CAP) annually, as described in earlier sections of this State Plan. The CAP includes an entire section which requires each CAA to describe their own annual plan for linkages, coordination, partnerships, and collaboration with public and private sector organizations to assure the effective delivery and coordination of CSBG services to low-income people and communities and avoid duplication of services. There are several layers of BCAEO review and approval of the CAP. Additionally, BCAEO Compliance Monitors review the CAA's CAP, strategic plan, and Community Needs Assessment during monitoring. BCAEO also reviews statewide reporting data from CAAs at least quarterly. The state office has several staff that sit on various committees and attend meetings with other state departments and public interest groups to help create and promote linkages for the community action network. Information is shared through BCAEO communications, such as the monthly BCAEO Update virtual newsletter, and when possible, CAA participants are invited to participate in these events. One example of this is the Social Determinants of Health movement within MDHHS. Workgroups are made of over 100 participants statewide to promote the opportunity to share local and statewide needs for linkages. Another is the Energy Waste Reduction Workgroup, and another is the Michigan Poverty Taskforce.

9.3b State Assurance of Eligible Entity Linkages to Fill Service Gaps:

Describe how the eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations, according to the assurance under Section 676(b)(3)(B) of the CSBG Act.

Note: This response will link to the corresponding CSBG assurance, item 14.3b., and pre-populates the Annual Report, Module 1, Item G.3b.

BCAEO requires each CAA to submit a Community Action Plan (CAP) annually, as described in earlier sections of this State Plan. The CAP includes an entire section which requires each CAA to describe their own annual plan to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations. There are several layers of BCAEO review and approval of the CAP. Additionally, BCAEO Compliance Monitors review the CAA's CAP, strategic plan, and Community Needs Assessment during monitoring. BCAEO also reviews statewide reporting data from CAAs at least quarterly. BCAEO collaborates with MI 2-1-1, a service any Michigan Resident can call or text to find assistance in their area, to ensure CAAs and their services are in the system. MI 2-1-1 refers individuals seeking assistance to organizations in their area, which includes CAAs. BCAEO collaborates with MI Bridges, the State of Michigan's online system for applying for benefits, to ensure CAAs are listed in the system as referral partners and that CAA staff are trained as Navigators (Navigators can assist applicants through the application process). BCAEO requires CAAs to maintain a list of partner organizations in the statewide database, and consistently, the CAAs network of partnerships within the state is vast. Additionally, the state's new data solution has a robust referral electronic referral and follow-up tool available, which has been difficult to track and report with previous systems. Most CAAs are active leaders in their community in addition to participants in their Local Planning Bodies and Community Collaboratives. Michigan CAAs operates nearly 40 percent of the Head Start programs statewide. These programs require coordination with various child and family support services and Work First programs. As the largest senior services provider, CAAs work closely with their local Area Agencies on Aging. As the largest emergency food provider, CAAs coordinate and network with their area emergency food providers including churches, food coalitions, Gleaners, Red Cross food banks, The Salvation Army, and The United Way. The state assures this through monitoring engagements and reviewing the agency's CAP. Many agencies have staff that participate on community collaborative groups to ensure needs are met as well as statewide collaborative groups and many that have enhanced their participation in Diversity, Equity and Inclusion framework to help provide outreach to the maximum number of eligible households.

9.4. Workforce Innovation and Opportunity Act (WIOA) Employment and Training Activities:

Does the state intend to include CSBG employment and training activities as part of a WIOA Combined State Plan, as allowed under the Workforce Innovation and Opportunity Act (as required by the assurance under Section 676(b)(5) of the CSBG Act)? ☐ Yes ☒ No

Note: This response will link to the corresponding CSBG assurance, item 14.5.

9.4a. WIOA Combined Plan: If the state selected "yes" under item 9.4, provide the CSBG-specific information included in the state's WIOA Combined Plan. This information includes a description of how the state and the eligible entities will coordinate the provision of employment and training activities through statewide and local WIOA workforce development systems. This information may also include examples of innovative employment and training programs and activities conducted by community action agencies or other neighborhood-based organizations as part of a community antipoverty strategy.

9.4b. Employment and Training Activities: If the state selected "no" under item 9.4, describe the coordination of employment and training activities, as defined in Section 3 of WIOA, by the state and by eligible entities providing activities through the WIOA system.

In Michigan, federal workforce development programs are administered by the Department of Talent and Economic Development and workforce development services are administered locally through Workforce Development Boards. These boards represent the private sector as well as local government agencies, education, social services, labor, community-based organizations and other groups affecting workforce development in a community. Through this private-public partnership, Michigan's workforce development system -- Michigan Works! -- delivers employment and training programs across the state. The Michigan Works! Agencies (MWAs) oversee a wide variety of programs designed to prepare youth, unskilled adults and dislocated workers for entry into the labor force and to help individuals who are disadvantaged or who face serious barriers to employment obtain the training necessary to get and keep a job. Several CAAs in Michigan are part of a larger organization or are associated with another organization that is an MWA. These CAAs can provide direct supportive and referral services to their clients who are eligible for the employment and training programs offered by the MWA(s). In some instances, CAAs have partnered with their local MWA to share office space. Some have MWA staff on their tripartite board. In addition, several CAAs have entered into agreements with their local MWAs to provide specific services for low-income persons participating in their education and training programs. Many CAAs are involved in the provision of transportation, including direct transportation and car donation, financing and repair programs. Others have developed programs that provide case management, career training or job opportunities. CAAs that use CSBG funds for employment and training activities enter into a memorandum of understanding with their local MWA as required by the Workforce Innovation and Opportunity Act. dislocated workers for entry into the labor force and to help individuals who are disadvantaged or who face serious barriers to employment obtain the training necessary to get and keep a job. Several CAAs in Michigan are part of a larger organization or are associated with another organization that is an MWA. These CAAs can provide direct supportive and referral services to their clients who are eligible for the employment and training programs offered by the MWA(s). In addition, several CAAs have entered into agreements with their local MWAs to provide specific services for low-income persons participating in their education and training programs. Many CAAs are involved in the provision of transportation, including direct transportation and car donation, financing and repair programs. Others have developed programs that provide case management, career training or job opportunities. CAAs that use CSBG funds for employment and training activities enter into a memorandum of understanding with their local MWA as required by the Workforce Innovation and Opportunity Act.

9.5. Emergency Energy Crisis Intervention:

Describe how the state will assure, where appropriate, that emergency energy crisis intervention programs under Title XXVI (relating to Low-Income Home Energy Assistance) are conducted in each community in the state, as required by the assurance under Section 676(b)(6) of the CSBG Act).

Note: This response will link to the corresponding CSBG assurance, item 14.6.

LIHEAP funding is administered by a separate LIHEAP office in Michigan, and BCAEO has a long and successful history of working collaboratively with the MDHHS LIHEAP office. We have administered LIHEAP contracts for deliverable fuel assistance, crisis assistance, water assistance, water heater replacement, emergency services for natural disasters (should they occur), LIHEAP Weatherization funds, and most recently the LIHWAP program.

9.6. Faith-based Organizations, Charitable Groups, Community Organizations:

Describe how the state will assure local eligible entities will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations, according to the state's assurance under Section 676(b)(9) of the CSBG Act.

Note: this response will link to the corresponding assurance, item 14.9.

BCAEO requires each CAA to submit a Community Action Plan (CAP) annually, as described in earlier sections of this State Plan. The CAP includes an entire section which requires each CAA to describe how they will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations. There are several layers of BCAEO review and approval of the CAP. Additionally, BCAEO Compliance Monitors review the CAA's CAP, strategic plan, and Community Needs Assessment during monitoring. BCAEO also reviews statewide reporting data from CAAs at least quarterly.

9.7. Coordination of Eligible Entity 90 Percent Funds with Public/Private Resources:

Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act.

Note: this response will link to the corresponding assurance, item 14.3c.

BCAEO requires each CAA to submit a Community Action Plan (CAP) annually, as described in earlier sections of this State Plan. The CAP includes an entire section which requires each CAA to describe how they will coordinate CSBG 90 percent funds with other public and private resources. There are several layers of BCAEO review and approval of the CAP. Additionally, BCAEO Compliance Monitors review the CAA's CAP, strategic plan, and Community Needs Assessment during monitoring. BCAEO also reviews statewide reporting data from CAAs at least quarterly. BCAEO's financial monitoring team evaluates CSBG expenditures during annual fiscal monitoring. Most CAAs use at least some of their 90% CSBG Allocation to support the costs of direct service programs that are under-funded by other sources, as well as for operational/administrative costs. As a result, the coordination of public and private resources is one the core functions of CSBG resources in Michigan's CAA network. They coordinate most of their programs with public and private resources and have both verbal and written agreements concerning coordination, referrals, exchange of information, specific services to be provided, funding, and volunteers. BCAEO requires CAAs to maintain a list of partner organizations in the statewide database, and consistently, the CAAs network of partnerships within the state is vast. Examples of public resources include: hospitals and health care providers; law-enforcement and courts; schools and juvenile offices; local MDHHS offices; transit and housing development authorities; public utilities; commissions on aging; Work First and One Stop centers; federal grantors. Examples of private resources include: volunteers, mentoring and literacy coalitions; child and senior care providers; farm worker and migrant services organizations; diaper banks; energy and transportation providers; churches, food pantries and Gleaners; foundations; Walk for Warmth, Urban Leagues, United Way, Red Cross, Salvation Army; and banks and lending institutions.

9.8. Coordination among Eligible Entities and State Community Action Association:

Describe state activities for supporting coordination among the eligible entities and the state community action association.

Note: This information will pre-populate the Annual Report, Module 1, Item G.5.

BCAEO includes the state association (MCA) on communications to the CAA network and invites MCA participation and feedback. BCAEO contracts with MCA to provide training and technical assistance to CAAs, and discussions/surveys are held to determine training assistance needs and the needs of the CAAs. MCA is working in collaboration with the state and has created a shared website for CAA training and technical use. MCA attends BCAEO Commission Meetings and meets at least monthly with BCAEO staff and quarterly with MDHHS leadership to maintain close ties and to expand cooperation, coordination and innovation. MCA and BCAEO also work together to submit the required RPIC state training plan.

9.9. Communication with Eligible Entities and the State Community Action Association:

In the table below, detail how the state intends to communicate with eligible entities, the state community action association, and other partners identified under this State Plan on the topics listed below. For any topic that is not applicable, select "Not Applicable" under Expected Frequency.

Communication Plan			
Subject Matter	Expected Frequency	Format	Brief description of "Other"
Upcoming Public and/or Legislative Hearings	Annually		Public notice in newspaper article in key geographic areas, email communication to eligible entities, Public notice posting on website
State Plan Development	As needed		
Organizational Standards Progress	Annually		Monitoring review process: emails, meetings, and monitoring reports
State Accountability Measures Progress	As needed		
Community Needs Assessments/Community Action Plans	Daily		Available on statewide community needs assessment website.
State Monitoring Plans and Policies	Annually		Monitoring review process; emails, meetings, and monitoring reports.
Training and Technical Assistance (T/TA) Plans	As needed		
ROMA and Performance Management	As needed		
State Interagency Coordination	As needed		
CSBG Legislative/Programmatic Updates	As needed		
Tripartite Board Requirements	As needed		Policy that is available on the state offices SharePoint site for eligible entities

9.10. Feedback to Eligible Entities and State Community Action Association:

Describe how the state will provide information to local entities and state community action associations regarding performance on state accountability measures.

Note: This information is associated with State Accountability Measure 5S(iii). and will pre-populate the Annual Report, Module 1, Item G.6

BCAEO will continue to implement the communication plan that was developed in response to feedback from the CAA network. During the planning process for the FY25-26 State Plan, BCAEO received feedback indicating that the current communication processes have been effective at keeping the CAA network informed. BCAEO will utilize with monthly newsletters (BCAEO Update) that is sent to over 300 recipients. BCAEO will utilize a secure SharePoint site to which all CAAs have access which will contain content and training for all our programs. BCAEO will utilize empowOR, the new statewide data solution, to house training provided by the software vendor on empowOR functionality. Throughout the year, the BCAEO management team holds meetings with the network, meetings with Executive Directors, meetings with the state association staff, meetings with the state association Executive Director and Board Chair, meetings with MDHHS Leadership and the state association Executive Director and Board Chair, meetings with the Upper Peninsula Executive Directors, and other meetings as requested or applicable to provide and receive feedback. If there is an issue that comes up that a meeting may not be necessary for, focused written communication is shared with the applicable recipients. BCAEO will also utilize in-person meetings described earlier in this State Plan to share updates on performance as needed.

9.11. Communication Plan Performance Management Adjustment:

Describe any adjustments the state made to the Communication Plan in this State Plan as compared to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

Note: This information is associated with State Accountability Measures 7Sb; this response may pre-populate the state's annual report form.

BCAEO will continue to implement the communication plan that was developed in response to feedback from the CAA network. During the planning process for the FY25-26 State Plan, BCAEO received feedback indicating that the current communication processes have been effective at keeping the CAA network informed. One area where we continue to strive for improvement as the number of BCAEO staff members has grown is ensuring consistency of communication. BCAEO has created a procedure in place that ensure network-wide communication is reviewed by several BCAEO staff members before distribution and that communication is sent through the central email account. BCAEO also schedules meetings prior to monitoring reports being sent to discuss any potential recommendations or findings to ensure policy is being applied consistently.

Section 10: Monitoring, Corrective Action, and Fiscal Controls

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

Form Approved
OMB No: 0970-0382
Expires: 09/30/2025

SECTION 10 Monitoring, Corrective Action, and Fiscal Controls

Monitoring, Corrective Action and Fiscal Controls (Section 678B(a) of the Act)

10.1. Specify the proposed schedule for planned monitoring visits - including full on-site reviews; on-site reviews of newly designated entities; follow-up reviews - including return visits to entities that failed to meet State goals, standards, and requirements; and other reviews as appropriate.

This is an estimated schedule to assist states in planning. States may indicate "no review" for entities the state does not plan to monitor in the performance period.

Note: This information is associated with State Accountability Measure 4Sa(i); this response pre-populates the Annual Report, Module 1, Table H.1.

	CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of "Other"
1	Allegan County Resource Development Committee Inc	Other	Onsite Review	FY1 Q2	08/01/2024	08/31/2024	24 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
2	Kent, County of (Inc)	Other	Onsite Review	FY1 Q2	12/14/2023	04/08/2024	24 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
3	Baraga-Houghton-Keweenaw Community Action Agency, Inc	Other	Desk Review	FY1 Q3	03/18/2024	03/26/2024	25 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
4	Blue Water Community Action	Other	Onsite Review	FY1 Q3	03/20/2024	07/31/2024	19 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews

5	Capital Area Community Services Incorporated	Other	Onsite Review	FY1 Q2	07/01/2024	09/30/2024	30 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
6	Chippewa Luce Mackinac	Other	Desk Review	FY1 Q4	05/05/2024	05/23/2024	34 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
7	Community Action Agency of South Central Michigan, The	Other	Onsite Review	FY1 Q2	02/26/2024	07/18/2024	23 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
8	Dickinson Iron Community Services Agency	Other	Desk Review	FY1 Q3	06/01/2024	09/01/2024	23 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
9	EightCAP Inc	Other	Onsite Review	FY1 Q2	12/20/2023	07/31/2024	28 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
10	Alger Marquette Community Action Board	Other	Desk Review	FY1 Q3	05/23/2024	08/31/2024	15 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews

11	Community Action Agency	Other	Onsite Review	FY1 Q4	12/13/2023	03/04/2024	15 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
12	FiveCAP Inc	Other	Desk Review	FY1 Q4	05/28/2024	06/27/2024	40 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
13	Genesee, County of	Other	Onsite Review	FY1 Q4	08/07/2024	09/30/2024	40 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
14	Gogebic-Ontonagon Community Action	Other	Desk Review	FY1 Q3	02/20/2024	04/23/2024	18 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
15	Human Development Commission Inc	Other	Onsite Review	FY1 Q2	04/04/2024	07/31/2024	22 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
16	Macomb, County of	Other	Desk Review	FY1 Q2	01/04/2024	06/06/2024	23 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews

17	Human Resources Authority Inc	Other	Desk Review	FY1 Q3	07/01/2024	08/01/2024	25 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
18	Mid Michigan Community Action Agency Inc	Other	Desk Review	FY1 Q2	07/12/2024	08/12/2024	54 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
19	Monroe County Opportunity Program, Inc	Other	Desk Review	FY1 Q2	02/15/2024	02/26/2024	25 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
20	Northeast Michigan Community Service Agency Inc	Other	Onsite Review	FY1 Q3	07/15/2024	09/30/2024	28 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
21	Northwest Michigan Community Action Agency Inc	Other	Desk Review	FY1 Q3	05/01/2024	06/30/2024	27 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
22	Oakland Livingston Human Services Agency	Other	Desk Review	FY1 Q3	06/01/2024	08/01/2024	24 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews

23	Ottawa, County of	Other	Onsite Review	FY1 Q4	02/22/2024	07/16/2024	31 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
24	Saginaw County Community Action Committee	Other	Onsite Review	FY1 Q3	12/14/2023	04/05/2024	18 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
25	Southwest Michigan Community Action Agency	Other	Onsite Review	FY1 Q3	02/26/2024	08/31/2024	28 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
26	Washtenaw, County of	Other	Onsite Review	FY1 Q3	02/14/2024	08/31/2024	22 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
27	Wayne Metropolitan Community Action Agency	Other	Onsite Review	FY1 Q4	03/01/2024	04/01/2024	46 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
	CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of "Other"
1	Allegan County Resource Development Committee Inc	Other	Desk Review	FY2 Q3	08/01/2024	08/31/2024	24 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial,

							program, org standards, and other reviews
2	Kent, County of (Inc)	Other	Desk Review	FY2 Q2	12/14/2023	04/08/2024	24 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
3	Baraga-Houghton-Keweenaw Community Action Agency, Inc	Other	Desk Review	FY2 Q3	03/18/2024	03/26/2024	25 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
4	Blue Water Community Action	Other	Desk Review	FY2 Q4	03/20/2024	07/31/2024	19 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
5	Capital Area Community Services Incorporated	Other	Desk Review	FY2 Q2	07/01/2024	07/31/2024	30 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
6	Chippewa Luce Mackinac	Other	Desk Review	FY2 Q4	05/05/2024	05/23/2024	34 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
7	Community Action Agency of South Central Michigan, The	Other	Desk Review	FY2 Q3	02/26/2024	07/18/2024	23 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial,

							program, org standards, and other reviews
8	Dickinson Iron Community Services Agency	Other	Desk Review	FY2 Q3	06/01/2024	09/01/2024	23 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
9	EightCAP Inc	Other	Desk Review	FY2 Q2	12/20/2023	07/31/2024	28 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
10	Alger Marquette Community Action Board	Other	Desk Review	FY2 Q3	05/03/2024	08/31/2024	15 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
11	Community Action Agency	Other	Desk Review	FY2 Q4	12/13/2023	03/04/2024	15 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
12	FiveCAP Inc	Other	Desk Review	FY2 Q4	05/28/2024	06/27/2024	40 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
13	Genesee, County of	Other	Desk Review	FY2 Q4	08/07/2024	09/30/2024	40 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial,

							program, org standards, and other reviews
14	Gogebic-Ontonagon Community Action	Other	Desk Review	FY2 Q3	02/20/2024	04/23/2024	18 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
15	Human Development Commission Inc	Other	Desk Review	FY2 Q4	04/04/2024	07/31/2024	BCAEO completes monitoring reviews for each CAA with 3 monitoring teams: Financial, Programmatic, and Organizational Standards. A comprehensive "Full" Review is the efforts of all 3 teams.
16	Macomb, County of	Other	Desk Review	FY2 Q2	01/04/2024	06/06/2024	23 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
17	Human Resources Authority Inc	Other	Desk Review	FY2 Q3	07/01/2024	08/01/2024	25 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
18	Mid Michigan Community Action Agency Inc	Other	Desk Review	FY2 Q2	07/12/2024	08/12/2024	54 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
19	Monroe County Opportunity Program, Inc	Other	Desk Review	FY2 Q2	02/15/2024	02/26/2024	25 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review

							requirements. This includes financial, program, org standards, and other reviews
20	Northeast Michigan Community Service Agency Inc	Other	Desk Review	FY2 Q3	07/15/2024	09/30/2024	28 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
21	Northwest Michigan Community Action Agency Inc	Other	Desk Review	FY2 Q3	05/01/2024	06/30/2024	27 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
22	Oakland Livingston Human Services Agency	Other	Desk Review	FY2 Q3	06/01/2024	08/01/2024	24 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
23	Ottawa, County of	Other	Desk Review	FY2 Q4	02/22/2024	07/16/2024	31 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
24	Saginaw County Community Action Committee	Other	Desk Review	FY2 Q4	12/14/2023	04/05/2024	18 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
25	Southwest Michigan Community Action Agency	Other	Desk Review	FY2 Q3	02/26/2024	08/31/2024	28 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review

							requirements. This includes financial, program, org standards, and other reviews
26	Washtenaw, County of	Other	Desk Review	FY2 Q3	02/14/2024	08/31/2024	22 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews
27	Wayne Metropolitan Community Action Agency	Other	Desk Review	FY2 Q4	03/01/2024	04/01/2024	46 monitoring reviews were completed from 10/1/21 to 9/30/24 to ensure the comprehensive full review requirements. This includes financial, program, org standards, and other reviews

10.2. Monitoring Policies:
Provide a copy of state monitoring policies and procedures by attaching and/or providing a hyperlink.

See attachments: CSPM 1300 and BCAEO Annual Monitoring Plan.

10.3. Initial Monitoring Reports:
According to the state's procedures, by how many calendar days must the State disseminate initial monitoring reports to local entities?

Note: This item is associated with State Accountability Measure 4Sa(ii) and may pre-populate the state's annual report form.

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**Corrective Action, Termination and Reduction of Funding and Assurance Requirements
(Section 678C of the Act)**

10.4. Closing Findings:
Are state procedures for addressing eligible entity findings/deficiencies and documenting the closure of findings, included in the State monitoring protocols attached above? ☐ Yes ☒ No

10.4a. Closing Findings Procedures: If no describe state procedures for addressing eligible entity findings/deficiencies, and documenting the closure of findings.

Monitoring report findings summarizes the issue, lists the citation, and requires a due date for the corrective action. Eligible entities will respond by submitting a corrective action plan that will be used to correct the problem. Corrective action plans that have been reviewed and will appropriately work towards resolving the issue or have corrected the problem will be reported as resolved in a management decision letter.

10.5. Quality Improvement Plans (QIPs):
Provide the number of eligible entities currently on QIPs, if applicable.

Note: The QIP information is associated with State Accountability Measures 4Sc.

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10.6. Reporting of QIPs:
Describe the state's process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the State approving a QIP

Note: This item is associated with State Accountability Measures 4Sa(iii).

The state office will setup a meeting with the Office of Community Services to share the monitoring report that contains findings requiring a quality improvement plan within 30 days of issuing the monitoring report to the eligible entity.

10.7. Assurance on Funding Reduction or Termination:
The state assures,"that any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided inSection 678C(b)" per Section 676(b)(8). ☒ Yes ☐ No

Note: This response will link with the corresponding assurance under item 14.8.

Policies on Eligible Entity Designation, De-designation, and Re-designation

10.8. Eligible Entity Designation: Do the State CSBG statute and/or regulations provide for the designation of new eligible entities? ☒ Yes ☐ No

No
10.8a. New Designation Citation: If yes, provide the citation(s) of the law and/or regulation.
https://www.legislature.mi.gov/Laws/MCL?objectName=mcl-400-1108
10.8b. New Designation Procedures: If no, describe state procedures for the designation of new eligible entities and how the procedures were made available to eligible entities and the public
10.9. Eligible Entity Termination: Do State CSBG statute and/or regulations provide for termination of eligible entities <input checked="" type="radio"/> Yes <input type="radio"/> No
10.9a. Termination Citation: If yes, provide the citation(s) of the law and/or regulation.
https://www.legislature.mi.gov/Laws/MCL?objectName=mcl-400-1108
10.9b. Termination Procedures: If no, describe state procedures for termination of new eligible entities and how the procedures were made available to eligible entities and the public
10.10. Does the State CSBG statute and/or regulations specify a process the State CSBG agency must follow to re-designate an existing eligible entity? <input checked="" type="radio"/> Yes <input type="radio"/> No
10.10a. If Yes, provide the citation(s) of the law and/or regulation.
https://www.legislature.mi.gov/Laws/MCL?objectName=mcl-400-1108
10.10b. If No, describe State procedures for re-designation of existing eligible entities.
Fiscal Controls and Audits and Cooperation Assurance
10.11. Fiscal Controls and Accounting: Describe how the state's fiscal controls and accounting procedures will a) permit preparation of the SF-425 Federal fiscal reports (FFR) and b) permit the tracing of expenditures adequate to ensure funds have been used appropriately under the block grant, as required by Block Grant regulations applicable to CSBG at 45 CFR 96.30(a).
The Federal Reporting Section in MDHHS uses the State's Accounting system (SIGMA) to reconcile all expenditures reported in the FFR. BCAEO's grant managers and financial monitors ensure all CSBG funds are used appropriately during contract review and approvals, statement of expenditure reviews, and financial monitoring visits.
10.12. Single Audit Management Decisions: Describe state procedures for issuing management decisions for eligible entity single audits, as required by Block Grant regulations applicable to CSBG at 45 CFR 75.521.
<i>Note: This information is associated with State Accountability Measure 4Sd.</i>
The Michigan Department of Health and Human Services, Office of Quality Assurance and Internal Controls reviews the single audit. When findings are listed, the Office of Quality Assurance and Internal Controls requests a response from the agency. BCAEO reviews the finding and the agency's response and submits a management decision letter within the time frame defined by the Office of Quality Assurance and Internal Controls. The management decision, with a copy to Bureau of Audit, is due the earlier of 30 days after the date of the Bureau of Audit memo to the program office, or six months after the departments receipt of the audit report.
10.13. Assurance on Federal Investigations: The state will "permit and cooperate with Federal investigations undertaken in accordance with Section 678D" of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act. <input checked="" type="radio"/> Yes <input type="radio"/> No
<i>Note: This response will link with the corresponding assurance, Item 14.7.</i>
10.13a. Federal Investigations Policies: Are state procedures for permitting and cooperating with federal investigations included in the state monitoring policies attached under 10.2? <input type="radio"/> Yes <input checked="" type="radio"/> No
10.13b. Closing Findings Procedures: If no, describe state procedures for permitting and cooperating with federal investigations.
Information that has been requested will be provided in a timely fashion. The state will ensure that federal partners are made aware of any issues or activities that may cause concern.
10.14. Monitoring Procedures Performance Management Adjustment: Describe any adjustments the state made to monitoring procedures in this State Plan as compared to past plans? Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.
<i>Note: This item is associated with State Accountability Measure 4Sb and may pre-populate the state's annual report form.</i>
Based on feedback from CAAs, BCAEO is making a concerted effort to align feedback from monitors and BCAEO monitoring reports. Monitoring report templates have been redesigned to be more clear and to use clearer language, and internal team meetings are being held to discuss each monitoring report prior to being sent to CAAs to ensure consistency in language and application of policy.

Section 11: Eligible Entity Tripartite Board

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SECTION 11 Eligible Entity Tripartite Board

11.1. Tripartite Board Verification: Verify which of the following measures are taken to ensure that the state verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B(a)(2) of the CSBG Act[*Check all that applies and narrative where applicable*]

- ☒ Attend Board meetings
- ☒ Organizational Standards Assessment
- ☒ Monitoring
- ☒ Review copies of Board meeting minutes
- ☒ Track Board vacancies/composition
- ☐ Other

11.2. Tripartite Board Updates: Provide how often the state require eligible entities (which are not on TAPs or QIPs) to provide updates regarding their Tripartite Boards. This includes but is not limited to copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc., [*Select one and narrative where applicable*]

- ☐ Annually
- ☐ Semiannually
- ☐ Quarterly
- ☐ Monthly
- ☒ As it Occurs
- ☐ Other

11.3. Tripartite Board Representation Assurance: Describe how the state will verify that eligible entities have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entity's Tripartite Board as required by the assurance under Section 676(b)(10) of the CSBG Act

Note: This response will link with the corresponding assurance, item 14.10.

CAAs follow our Community Services Policy Manual, which reflects the CSBG Act. Tri-Partite Board procedures are listed in each CAA's bylaws. This question is included in the annual Community Action Plan and also reviewed during monitoring engagements.

11.4. Tripartite Board Alternative Representation: Does the state permit public eligible entities to use, as an alternative to a Tripartite Board, "another mechanism specified by the state to assure decision-making and participating by low income individuals in the development, planning, implementation, and evaluation of programs" as allowed under Section 676B(b)(2) of the CSBG Act. ☐ Yes ☒ No

11.4a. Tripartite Board Alternative Mechanism: If yes, describe the mechanism used by public eligible entities as an alternative to a Tripartite Board.

Section 12: Individual and Community Eligibility Requirements

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SECTION 12 Individual and Community Income Eligibility Requirements

12.1. Required Income Eligibility:

Provide the income eligibility threshold for services in the state.

[Check one item below.]

☒ 125% of the HHS poverty line ☐ X% of the HHS poverty line (fill in the threshold) ☐ Varies by eligible entity

0% % *[Response Option: numeric field]*

12.1a. Income Eligibility Policy and Procedures: Describe any state policy and/or procedures for income eligibility, such as treatment of income and family/household composition.

The CSBG Act generally permits state to use up to 125% of the federal poverty guidelines as a criterion of eligibility. If federal legislative action permits a state to adopt a percentage of poverty higher than 125% then BCAEO shall select the highest percentage of poverty permissible as a criterion of eligibility. For example, BCAEO has adopted and implemented 200% for CSBG as soon as it was made available and will continue to do so if possible. From FY24 Community Services Policy Manual during which time 200% FPL was approved by federal legislative action (excerpt): "200% of the federal poverty line shall be used to determine eligibility for services provided with CSBG funds unless alternate guidance is issued in writing by BCAEO based on federal legislation. Income refers to total cash receipts (gross) before taxes from all sources (see Income Inclusions/Exclusions below) for all household members. Exception: See the Income Eligibility Determination Exception. Grantees are responsible for conducting income eligibility determinations. Household Composition Income from all household members is used to determine income eligibility. A household is all persons occupying a housing unit, regardless of whether they are related. Exception: For income eligibility purposes, Foster Children are not to be included as household members and Foster Care payments/subsidies are not to be included as income. Absent Household Members Household members who are absent from the home for 90 consecutive days or more are excluded from the household and therefore, their income is excluded. Roomers For applicants/households that have roomers paying rent, the roomer is not considered a member of the household and the income of the roomer is not counted for income eligibility. However, the rent from the roomer should be included as income. When annualizing income, the income from rent payments should only be included for the months that rent was received. For applicants/households that are roomers paying rent, only the income of the roomer is counted for income eligibility (the income of the homeowner/principle renter is not counted). Documentation of "roomer" status must be provided including: 1. A written and signed statement from the homeowner/principle renter that the applicant is a "roomer" and is paying monthly rent in the amount of \$. 2. A copy of a canceled check or monthly bank statement showing the check amount and the payee. 3. If the payment transaction was in cash, or a canceled check or monthly bank statement is not available, ask the applicant to get a written receipt from the homeowner for the last month's rent paid (this could be incorporated in #1 above if necessary).

12.2. Income Eligibility for General/Short-Term Services:

Describe how the state ensures eligible entities generally verify income eligibility for those services with limited in-take procedures (where individual income verification is not possible or practical).An example of these services is emergency food assistance.

From Community Services Policy Manual 502 (excerpt): When CSBG funds support short-term services with limited intake procedures, and individual income verification is not possible or practical, the Grantee may not always be required to conduct individual eligibility determinations. This may happen if services are: 1. Provided to a group rather than to individuals and circumstances indicate that group members will predominantly be income-eligible. Examples: a. Financial literacy (or other program) information and materials provided at community gathering in low-income area or to Head Start parents b. Donations of food or meals c. Summer meals for youth 2. Provided on individual basis but impossible or impracticable to obtain income documentation Examples: a. Part of outreach to potential clients, such as open house at CAA b. Initial intake and information referral process c. Temporary shelter to homeless individuals d. Disaster relief 3. Intended to increase community awareness of or involvement in poverty issues Examples: a. Poverty Forum b. Building Partnerships with other organizations NOTE: CAAs should make every effort possible to obtain client information to include in the CSBG Annual Report. To exclude eligibility determination for certain programs/clients, CAAs must document the following: 1. Name of program 2. Service Area 3. Reason for eligibility determination exclusion (1,2, or 3 above or other) 4. Proof that the clients will be predominantly income eligible. (Census data, Community Assessment documentation of the neighborhood, percentage of low- income people in area, etc.) NOTE: For all programs that are supported by CSBG funds, Grantees must provide reasonable, documented evidence that the proportion of program clients who are CSBG-eligible is equal to or greater than the proportion of program costs paid with CSBG funds, or the proportion of program staff time devoted to serving CSBG-eligible clients is equal to or greater than the proportion of program costs paid with CSBG funds. Example: if CSBG supports 30% of a programs costs, then the agency must be able to demonstrate that at least 30% of the clients served have incomes at or below 200% (or 125% depending on Congressional action) of the federal poverty level, or at least 30% of staff time is allocated to serving CSBG-eligible clients. Example: if 10% of clients are documented as eligible, no more than 10% of funds should come from CSBG. Example: The CAA could provide evidence that due to the venue in which a particular service is provided, such as meals provided in an emergency homeless shelter, it could reasonably be assumed that clients meet the CSBG income guidelines.

12.3. Community-targeted Services: Describe how the state ensures eligible entities' services target and benefit low-income communities for services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations).

CAAs identify needs of low-income communities, establish the missions of their organizations, & create programs & services through the ROMA cycle, which includes the Community Needs Assessment & strategic planning. CAAs submit annual CSBG Community Action Plans (CAP) to BCAEO for review, which must be approved prior to expenditures being approved for reimbursement. BCAEO ensures eligible entities' services target & benefit low-income communities for services that provide a community-wide benefit at various points from pre-award to grant closeout. During the pre-award process, BCAEO reviews the Community Action Plan, Expenditure Plan, & Community Needs Assessment. Several BCAEO staff review the CAP, & when CAAs propose a Community Initiative, the BCAEO ROMA Data Integration Coordination, a Certified ROMA Master Trainer, reviews that section of the CAP. The CSBG Specialist also reviews that section of the CAP to ensure compliance with CSBG Annual Reporting compliance. BCAEO has developed policy for services provided to groups within the community &/or the community at large. An excerpt follows: When CSBG funds support short-term services with limited intake procedures, & individual income verification is not possible or practical, the Grantee may not always be required to conduct individual eligibility determinations. This may happen if services are: 1. Provided to a group rather than to individuals & circumstances indicate that group members will predominantly be income-eligible. Eg [] 2. Provided on individual basis but impossible or impracticable to obtain

income documentation Eg [] 3. Intended to increase community awareness of or involvement in poverty issues Egs: Eg [] NOTE: CAAs should make every effort possible to obtain client information to include in the CSBG Annual Report. To exclude eligibility determination for certain programs/clients, CAAs must document the following: 1. Name of program 2. Service Area 3. Reason for eligibility determination exclusion (1,2, or 3 above or other) 4. Proof that the clients will be predominantly income eligible. NOTE: For all programs that are supported by CSBG funds, Grantees must provide reasonable, documented evidence that the proportion of program clients who are CSBG-eligible is equal to or greater than the proportion of program costs paid with CSBG funds, or the proportion of program staff time devoted to serving CSBG-eligible clients is equal to or greater than the proportion of program costs paid with CSBG funds. Eg: if CSBG supports 30% of a programs costs, then the agency must be able to demonstrate that at least 30% of the clients served have incomes at or below 200% (or 125% depending on Congressional action) of the federal poverty level, or at least 30% of staff time is allocated to serving CSBG-eligible clients. Eg: if 10% of clients are documented as eligible, no more than 10% of funds should come from CSBG. Eg: The CAA could provide evidence that due to the venue in which a particular service is provided, such as meals provided in an emergency homeless shelter, it could reasonably be assumed that clients meet the CSBG income guidelines. During each FY, BCAEO has numerous touchpoints with CAAs, including financial, programmatic, & OS monitoring, formal training & technical assistance, & frequent communication. BCAEO also conducts formal year-end closeout activities, including financial closeout & formal review of the CSBG Annual Report. During monitoring, compliance with CSPM is monitored. If a CAA has proposed community-wide services, BCAEO monitoring will help ensure low-income communities are the target for CSBG services. BCAEO provides training & technical assistance on a variety of topics, including eligibility determinations & CSPM, which emphasizes the importance of compliance with all state & federal regulations, including that community-wide services be focused on low-income communities.

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

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SECTION 13 Results Oriented Management and Accountability (ROMA) System

13.1. Performance Measurement System:

Identify the performance measurement system that the state and all eligible entities use, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act.

Note: This response will also link to the corresponding assurance, Item 14.12. and will pre-populate the Annual Report, Module I, Item I.1.

- ☒ The Results Oriented Management and Accountability (ROMA) System
- ☐ Another performance management system that meets the requirements by Section 678E(b) of the CSBG Act
- ☐ An alternative system for measuring performance and results

13.1a. ROMA Description: If ROMA was chosen in Item 13.1, describe the state's written policies, procedures, or guidance documents on ROMA.

BCAEO requires CAAs to submit logic models in the statewide database annually as part of the Community Action Plan which are reviewed by BCAEO staff. The logic models establish targets for the CSBG Annual Report, are used during quarterly CSBG reporting by CAAs to BCAEO, are used by CAAs during their own data analysis. BCAEO provides written guidance on the creation of logic models and provides ongoing technical assistance. ROMA requirements are included throughout the Community Services Policy Manual. BCAEO partners with the Michigan Community Action Agency Association to promote, provide, and support certified ROMA training throughout the CAA network. Several BCAEO staff are ROMA certified.

13.1b. Alternative System Description: If an alternative system was chosen in Item 13.1, describe the system the state will use for performance measurement.

13.2. Outcome Measures: Indicate and describe the outcome measures the state will use to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization, as required under Section 676(b)(12) of the CSBG Act.

Note: This response will also link to the corresponding assurance, Item 14.12.

- ☒ CSBG National Performance Indicators (NPIs)
- ☐ NPIs and others
- ☐ Others

The state will review performance toward meeting the CSBG Goals utilizing the National Performance Indicators (developed within the Community Services Network). Each CAA will report on the National Indicators that are applicable to their agency's programs. ROMA planning (identifying performance targets) will be included as part of the CAA CAP by using Logic Models. CAAs will use a statewide database for measuring and reporting outcomes.

13.3. Eligible Entity Support: Describe how the state supports the eligible entities in using the ROMA or alternative performance measurement system.

Note: The activities described under Item 13.3 may include activities... listed in "Section 8: State Training and Technical Assistance." If so, mention briefly, and/or cross-reference as needed. This response will also link to the corresponding assurance, item 14.12.

BCAEO encourages and supports eligible entities in using ROMA. The Michigan Community Action Agency Association (MCAAA), in coordination with BCAEO, will promote and provide ROMA training. BCAEO staff are certified ROMA trainers and provide ROMA training alongside other ROMA certified trainers in the CAA network. BCAEO provides at least monthly virtual meetings for system administrators of the statewide data system, empowOR, which is directly related to ROMA, and the meetings are facilitated by a certified ROMA trainer. In FYs 25-26, BCAEO intends to re-engage the full ROMA Collaborative, which was established in 2012 and is comprised of staff from CAAs, board members, MCAAA, and BCAEO. Over the past several years, the ROMA Collaborative has been focused on the transition and migration to empowOR through the Data Solutions Workgroup (one of its subcommittees). While the Data Solution Workgroup will remain a focus, BCAEO intends to re-engage the in-person component of the full ROMA Collaborative as well as the other important subcommittees, including the Leadership Board, the Outcome Sub-Committee, the Community Needs Assessment Sub-Committee, ROMA Education Sub-Committee, and CSBG Strategic Planning Sub-Committee. As has been discussed in this State Plan, BCAEO requires the CAAs submit Logic Models as a required part of the CSBG CAP. These Logic Models are reviewed by the certified ROMA trainers and implementers. BCAEO also supports the network in meeting Organizational Standards related to ROMA through training and technical assistance described in Section 8 of the State Plan.

13.4. Eligible Entity Use of Data:

Describe how is the state plan to validate the eligible entities that are using data to improve service delivery?

Note: This response will also link to the corresponding assurance, Item 14.12.

BCAEO does this in several ways. First, BCAEO provides the statewide data solution, empowOR, through CSBG Discretionary funds which was procured through a rigorous State of Michigan RFP process, and BCAEO supports a Help Desk with two internal employees, a ROMA Data Integration Coordinator and Data Reporting Specialist. As detailed, BCAEO conducts monthly training sessions for system administrators on the system. CAAs are required to enter logic models in empowOR as part of their annual CAP submission to BCAEO, which are reviewed by BCAEO. Beginning in FY24, BCAEO requires CAAs to submit quarterly reports based on the CSBG Annual Report that are reviewed against NPI targets from the CAP. Additionally, during programmatic compliance monitoring, programmatic monitors will review board minutes to ensure the boards are making informed data-driven decisions. BCAEO is assuring this step by conducting board interviews and conducting front line staff interviews during monitoring engagements. Some agencies have re-enrollment letters with quality of service questions, stakeholder/community partner surveys as part of strategic planning, and client surveys. A review of the agency's data collection methods will be cross-referenced with their CNA and planning tools.

Community Action Plans and Needs Assessments
13.5. Community Action Plan: Describe how the state will secure a Community Action Plan from each eligible entity, as a condition of receipt of CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act.
<i>Note: this response will link to the corresponding assurance, Item 14.11.</i>
All eligible entities requesting CSBG funds are required to submit a Community Action Plan (CAPs) via BCAEO's secure SharePoint site. Planning allocation amounts, program requirements, plan criteria, and other pertinent data are distributed annually in advance of submission. CAPs are reviewed by the assigned BCAEO grant manager staff using a CAP checklist and review guide for allowability of the use of funds. CAPs are then reviewed by the CSBG Specialist and the BCAEO Deputy Director and Executive Director to look for cost reasonableness as well as the potential for the proposed activities to move low-income clients toward self-sufficiency. CSBG funding not cannot be utilized until the CAP and expenditure plan are approved by BCAEO and confirmation is sent to the agency.
13.6. Community Needs Assessment: Describe how the State will assure that each eligible entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity's Community Action Plan, as required by Section 676(b)(11) of the CSBG Act.
<i>Note: this response will link to the corresponding assurance, Item 14.11.</i>
CAAs are required to provide a copy of their latest Community Needs Assessment to the state office when submitting their CAP. The CNA is reviewed with the CAP to ensure compliance with the CSBG Act. Additionally, CNAs are reviewed during organizational standards monitoring. If a CAA fails to conduct a CNA within three years, the agency receives a monitoring report with a CNA finding, either through Organizational Standards review or a programmatic monitoring engagement (not both). The report requires a Corrective Action Plan or Technical Assistance Plan to provide a timeline for a completed and approved CNA.

Section 14: CSBG Programmatic Assurances and Information Narrative

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SECTION 14 CSBG Programmatic Assurance and Information Narrative (Section 676(b) of the CSBG Act)

14.1 Use of Funds Supporting Local Activities

CSBG Services

14.1a. 676(b)(1)(A): Describe how the state will assure "that funds made available through grant or allotment will be used -

(A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farm workers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals--

- (i) to remove obstacles and solve problems that block the achievement of self sufficiency (particularly for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
- (ii) to secure and retain meaningful employment;
- (iii) to attain an adequate education with particular attention toward improving literacy skills of the low-income families in the community, which may include family literacy initiatives;
- (iv) to make better use of available income;
- (v) to obtain and maintain adequate housing and a suitable living environment;
- (vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent individual and family needs;
- (vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to -
 - (I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and
 - (II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

See attachment 14.1a Response due to character limitations.

Needs of Youth

14.1b. 676(b)(1)(B) Describe how the state will assure "that funds made available through grant or allotment will be used -

(B) to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as--

- (i) programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and
- (ii) after-school child care programs;

Youth programs can support social, emotional, cognitive, and academic development, reduce risky behaviors, promote physical health, and provide a safe and supportive for children and youth. Eligible entities describe the needs of youth in their CAPs using methods that include but not limited to case management, tutoring, mentoring, counseling, recreational programs, self-sufficiency and leadership training, health and wellness education, mental health, reproductive health, safety skills/violence prevention, financial literacy, and employment skills. The state office will assure that eligible entities address youth needs through review of the CAP, program performance monitoring, review of annual programmatic reports, and enforcement of CSBG grant agreement. CAAs work with private and governmental partners to develop youth programs to address the needs of youth in the low-income communities throughout Michigan. Some examples are: Providing a Women, Infant and Children (WIC) Program. Purchasing supplies for Head Start classrooms. Summer food programs. Walking clubs for youths and seniors to develop new friendships and increase self-esteem. Foster grandparent programs. Residential centers that provide treatment for victims of abuse and neglect. Service clubs that provide activities and games for children. Youth recreation and education. Youth employment programs. School success programs.

Coordination of Other Programs

14.1c. 676(b)(1)(C) Describe how the state will assure "that funds made available through grant or allotment will be used -

(C) to make more effective use of, and to coordinate with, other programs related to the purposes of this subtitle (including state welfare reform efforts)

Eligible entities summarize the process used to coordinate with community partners in CAP submission. Eligible entities participate in their service areas holding a variety of roles. Some eligible entities provide leadership as the lead agency for human service providers in the community and other eligible entities provide support. The eligible entity may take on different roles in implementing services depending on the circumstances facing their

community. The partnerships formed consist of eligible entities, the county local health department, the local Michigan Department of Health and Human Services Office, local government departments, and local nonprofits. The engagement the eligible entity provides in the develop partnership demonstrates compliance with this assurance. Eligible entities participate in the state's welfare reform efforts. MDHHS, through the legislative budget process, has appropriated a portion of TANF funds to support CAA activities for TANF eligible households and other federal resources including the Coronavirus Relief Funds (CRF) and the American Rescue Plan Funds (ARPA). Eligible entities coordinate efforts with their local MDHHS and Michigan Works! Agencies in providing case management and supportive services. A number of eligible entities are also operating individual development account programs, which assist households in moving further along the road to self-sufficiency. Also, under the Partnership. Accountability. Training. Hope. (PATH) initiative, increasing economic opportunity and reducing poverty through jobs, education, and training; eligible entities are a resource to partner and/or collaborate with local MDHHS offices and Michigan Works! Agencies to assist clients with supportive services and, where available, to play an active role in training activities. PATH places a strong emphasis on helping welfare applicants/recipients stay employed, gain skills, and advance. The goal is to help families find the resources they need to overcome obstacles and move up career ladders to self-sustaining, lasting employment. Michigan's Community Action Agencies are the largest network of human service providers outside of state government and are playing an active role in welfare reform through their collective and individual efforts including: Their common goal of self-sufficiency for low-income households and collaboration of services with local MDHHS offices; Participation in local collaborative bodies and decision making; Providing case management and supportive services (such as extended day care, transportation, skills enhancement, etc.) for Work First and Welfare-to-Work program participants; Collaborating with local resources while delivering weatherization and home repair services in efforts to minimize energy costs for clients and maximizing their spendable income.

State Use of Discretionary Funds

14.2 676(b)(2) Describe "how the state intends to use discretionary funds made available from the remainder of the grant or allotment described in section 675C(b) in accordance with this subtitle, including a description of how the state will support innovative community and neighborhood-based initiatives related to the purposes of this subtitle."

Note: The State describes this assurance under "State Use of Funds: Remainder/Discretionary," items 7.9 and 7.10

Eligible Entity Service Delivery, Coordination, and Innovation

14.3. 676(b)(3) "Based on information provided by eligible entities in the state, a description of..."

14.3a. 676(b)(3)(A) Describe "the service delivery system, for services provided or coordinated with funds made available through grants made under 675C(a), targeted to low-income individuals and families in communities within the state;"

Eligible entities provide service delivery systems that reduces client access burdens, avoid duplication of services, and addresses a variety of needs, each agency operates according to their local community conditions, priorities, and capacity. Services are provided in many locations throughout the eligible entities service areas as well as virtually. Most CAAs service delivery systems include information and referral, energy conservation and education, child development and childcare, supplemental food programs, older adult nutrition and support services, home buyer assistance, emergency assistance, case management services, tax preparation, and transportation. Clients enter the system various ways. They may have a referral from another human service agency in the county for assistance or from 2-1-1 that meets a specific need such as weatherization. They may have heard of Community Action through word of mouth and contact us themselves. Hospitals make referrals for seniors to participate in Older American Programs. There are various public service announcements reported in the newspaper and radio that alert clients to our services. Also, CAA staff sit on various committees throughout the county or are members of community collaboratives. These members are joined together in a long-term collaborative effort designed to strengthen inter-agency communication, ensure coordination, facilitate the continuation of needed existing services, promote community planning activities, and foster the development of consumer focused/culturally relevant services to meet the identified needs of the community. Eligible entities and their partners coordinate the intake and income eligibility processes to assess and track client demographic information. The intake process used by the eligible entities is the basis in determining the progress of meeting priorities and strategies to ensure the needs of low-income individuals and families are addressed. The state office requires eligible entities to be in compliance with this assurance as described in their CAP.

Eligible Entity Linkages - Approach to Filling Service Gaps

14.3b. 676(b)(3)(B) Describe "how linkages will be developed to fill identified gaps in the services, through the provision of information, referrals, case management, and followup consultations."

Note: The state describes this assurance in the state linkages and communication section, item 9.3b.

BCAEO requires each CAA to submit a Community Action Plan (CAP) annually, as described in earlier sections of this State Plan. The CAP includes an entire section which requires each CAA to describe their own annual plan to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations. There are several layers of BCAEO review and approval of the CAP. Additionally, BCAEO Compliance Monitors review the CAA's CAP, strategic plan, and Community Needs Assessment during monitoring. BCAEO also reviews statewide reporting data from CAAs at least quarterly. BCAEO collaborates with MI 2-1-1, a service any Michigan Resident can call or text to find assistance in their area, to ensure CAAs and their services are in the system. MI 2-1-1 refers individuals seeking assistance to organizations in their area, which includes CAAs. BCAEO collaborates with MI Bridges, the State of Michigan's online system for applying for benefits, to ensure CAAs are listed in the system as referral partners and that CAA staff are trained as Navigators (Navigators can assist applicants through the application process). BCAEO requires CAAs to maintain a list of partner organizations in the statewide database, and consistently, the CAAs network of partnerships within the state is vast. Additionally, the state's new data solution has a robust referral electronic referral and follow-up tool available, which has been difficult to track and report with previous systems. Most CAAs are active leaders in their community in addition to participants in their Local Planning Bodies and Community Collaboratives. Michigan CAAs operates nearly 40 percent of the Head Start programs statewide. These programs require coordination with various child and family support services and Work First programs. As the largest senior services provider, CAAs work closely with their local Area Agencies on Aging. As the largest emergency food provider, CAAs coordinate and network with their area emergency food providers including churches, food coalitions, Gleaners, Red Cross food banks, The Salvation Army, and The United Way. The state assures this through monitoring engagements and reviewing the agency's CAP. Many agencies have staff that participate on community collaborative groups to ensure needs are met as well as statewide collaborative groups and many that have enhanced their participation in Diversity, Equity and Inclusion framework to help provide outreach to the maximum number of eligible households.

Coordination of Eligible Entity Allocation 90 Percent Funds with Public/Private Resources

14.3c. 676(b)(3)(C) Describe how funds made available through grants made under 675C(a) will be coordinated with other public and private resources."

Note: The state describes this assurance in the state linkages and communication section, item 9.7.

BCAEO requires each CAA to submit a Community Action Plan (CAP) annually, as described in earlier sections of this State Plan. The CAP includes an entire section which requires each CAA to describe how they will coordinate CSBG 90 percent funds with other public and private resources. There

are several layers of BCAEO review and approval of the CAP. Additionally, BCAEO Compliance Monitors review the CAA's CAP, strategic plan, and Community Needs Assessment during monitoring. BCAEO also reviews statewide reporting data from CAAs at least quarterly. Additionally, BCAEO's financial monitoring team evaluates CSBG expenditures during annual fiscal monitoring. Most CAAs use at least some of their 90% CSBG Allocation to support the costs of direct service programs that are under-funded by other sources, as well as for operational/administrative costs. As a result, the coordination of public and private resources is one the core functions of CSBG resources in Michigan's CAA network. They coordinate most of their programs with public and private resources and have both verbal and written agreements concerning coordination, referrals, exchange of information, specific services to be provided, funding, and volunteers. BCAEO requires CAAs to maintain a list of partner organizations in the statewide database, and consistently, the CAAs network of partnerships within the state is vast. Examples of public resources include: hospitals and health care providers; law-enforcement and courts; schools and juvenile offices; local MDHHS offices; transit and housing development authorities; public utilities; commissions on aging; Work First and One Stop centers; federal grantors. Examples of private resources include: volunteers, mentoring and literacy coalitions; child and senior care providers; farm worker and migrant services organizations; diaper banks; energy and transportation providers; churches, food pantries and Gleaners; foundations; Walk for Warmth, Urban Leagues, United Way, Red Cross, Salvation Army; and banks and lending institutions.

Eligible Entity Innovative Community and Neighborhood Initiatives, Including Fatherhood/Parental Responsibility

14.3d. 676(b)(3)(D) Describe "how the local entity will use the funds [made available under Section 675C(a)] to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting."

Note: The description above is about eligible entity use of 90 percent funds to support these initiatives. States may also support these types of activities at the local level using State remainder/discretionary funds, allowable under Section 675C(b)(1)(F). In this State Plan, the State indicates funds allocated for these activities under item 7.9(f).

Eligible entities use CSBG funds to supportive innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting. CSBG funds support direct services but also supplement under-funded programs and administrative operations from a variety of funding sources. There are a variety of examples throughout Michigan's CAA network, such as The Fatherhood Initiative; The Bridges Out of Poverty Program; Getting Ahead Program; Energy Education seminars; Community Computer Rooms; Community Nutrition Programs; Parent, Family, and Community Engagement programs; Neighborhood Clean Up Projects; Senior Assistance; Financial Education; Community Baby Shower; Neighborhood-based initiatives; Youth Education; and, Credit Rebuilder Programs. Several CAAs focus on parental support programming, youth mentoring, and fatherhood support programming specifically.

Eligible Entity Emergency Food and Nutrition Services

14.4. 676(b)(4) Describe how the state will assure "that eligible entities in the state will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals."

Eligible entities emergency food assistance and nutritional services to low-income individual and families reduce the conditions of starvation and malnutrition. In Michigan, CAAs are the largest network of social services outside of state government and the largest emergency food provider network in the state. Eligible entities have participated in focus group meetings, food security council meetings, surveys, and food data submission to populate a real time food distribution dashboard to describe and mitigate food insecurities. Most of the CAAs are Temporary Emergency Food Assistance Program (TEFAP) and Commodity Supplemental Food Program (CSFP) service providers and/or provide home-delivered or congregate meals. The Home Delivered Meals program and the Congregate Meals program will continue to deliver meals during a state of emergency by providing shelf stable foods, frozen meals, fresh meals, or a combination. Those who are not eligible for senior meals can access the pantries in the communities, for food stocked by the TEFAP program and local donors. Eligible entities coordinate food distribution efforts with their community partners such as faith-based organizations, local government, shelters, food banks, restaurants, day care providers, and school districts.

State and Eligible Entity Coordination/linkages and Workforce Innovation and Opportunity Act Employment and Training Activities

14.5. 676(b)(5) Describe how the state will assure "that the state and eligible entities in the state will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services, and [describe] how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 3 of the Workforce Innovation and Opportunity Act, in the state and in communities with entities providing activities through statewide and local workforce development systems under such Act."

Note: The state describes this assurance in the state linkages and communication section, items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b.

State Coordination/Linkages and Low-income Home Energy Assistance

14.6. 676(b)(6) Provide "an assurance that the state will ensure coordination between antipoverty programs in each community in the state, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low income home energy assistance) are conducted in such community."

Note: The state describes this assurance in the state linkages and communication section, items 9.2 and 9.5.

Federal Investigations

14.7. 676(b)(7) Provide "an assurance that the state will permit and cooperate with Federal investigations undertaken in accordance with section 678D." Yes

Note: The state addresses this assurance in the Fiscal Controls and Monitoring section, item 10.13.

Funding Reduction or Termination

14.8. 676(b)(8) Provide "an assurance that any eligible entity in the state that received funding in the previous fiscal year through a community services block grant made under this subtitle will not have its funding terminated under this subtitle, or reduced below the proportional share of

funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the state determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b)." Yes
<i>Note: The state addresses this assurance in the Fiscal Controls and Monitoring section, item 10.7.</i>
Coordination with Faith-based Organizations, Charitable Groups, Community Organizations
14.9. 676(b)(9) Describe how the state will assure "that the state and eligible entities in the state will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the state, including religious organizations, charitable groups, and community organizations."
<i>Note: The state describes this assurance in the state Linkages and Communication section, item 9.6.</i>
Eligible Entity Tripartite Board Representation
14.10. 676(b)(10) Describe how "the state will require each eligible entity in the state to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation."
<i>Note: The state describes this assurance in the Eligible Entity Tripartite Board section, 11.3.</i>
CAAs follow our Community Services Policy Manual, which reflects the CSBG Act. Tri-Partite Board procedures are listed in each CAA's bylaws. This question is included in the annual Community Action Plan and also reviewed during monitoring engagements.
Eligible Entity Community Action Plans and Community Needs Assessments
14.11. 676(b)(11) Provide "an assurance that the state will secure from each eligible entity in the services block grant made under this subtitle for a program, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs."
<i>Note: The state describes this assurance in the ROMA section, items 13.5 and 13.6.</i>
State and Eligible Entity Performance Measurement: ROMA or Alternate system
14.12. 676(b)(12) 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."
<i>Note: The state describes this assurance in the ROMA section, items 13.1, 13.2, 13.3, and 13.4.</i>
Validation for CSBG Eligible Entity Programmatic Narrative Sections
14.13. 676(b)(13) Provide "information describing how the state will carry out the assurances described in this section."
<i>Note: The state provides information for each of the assurances directly in section 14 or in corresponding items throughout the State Plan, which are included as hyperlinks in section 14.</i>
<input checked="" type="checkbox"/> By checking this box, the state CSBG authorized official is certifying the assurances set out above.

Section 15: Federal Certifications

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

Form Approved
OMB No:0970-0382
Expires:09/30/2025

SECTION 15 Federal Certifications

15.1. CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

The box after each certification must be checked by the state CSBG authorized official.

15.1. Lobbying

After assurance select a check box:



By checking this box, the state CSBG authorized official is providing the certification set out above.

15.2. CERTIFICATION REGARDING DRUG-FREE WORKPLACE REQUIREMENTS

This certification is required by the regulations implementing the Drug-Free Workplace Act of 1988: 45 CFR Part 76, Subpart, F. Sections 76.630(c) and (d)(2) and 76.645 (a)(1) and (b) provide that a Federal agency may designate a central receipt point for STATE-WIDE AND STATE AGENCY-WIDE certifications, and for notification of criminal drug convictions. For the Department of Health and Human Services, the central point is: Division of Grants Management and Oversight, Office of Management and Acquisition, Department of Health and Human Services, Room 517-D, 200 Independence Avenue, SW Washington, DC 20201.

Certification Regarding Drug-Free Workplace Requirements (Instructions for Certification)

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.
2. The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. For grantees other than individuals, Alternate I applies.
4. For grantees who are individuals, Alternate II applies.
5. Workplaces under grants, for grantees other than individuals, need to be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
6. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or state highway department while in operation, state employees in each local unemployment office, performers in concert halls or radio studios).
7. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).
8. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

Controlled substance means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);.

Conviction means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the federal or state criminal drug statutes;

Criminal drug statute means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

Employee means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All direct charge employees; (ii) All indirect charge employees unless their impact or involvement is insignificant to the performance of the grant; and, (iii) Temporary personnel and consultants who are directly engaged in the performance of work under the grant

and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Grantees Other Than Individuals)

The grantee certifies that it will or will continue to provide a drug-free workplace by:

(a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;

(b) Establishing an ongoing drug-free awareness program to inform employees about--

(1) The dangers of drug abuse in the workplace;

(2) The grantee's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;

(c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);

(d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will - -

(1) Abide by the terms of the statement; and (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

(e) Notifying the agency in writing, within 10 calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

(f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a federal, state, or local health, law enforcement, or other appropriate agency;

(g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

Check if there are workplaces on file that are not identified here.

Alternate II. (Grantees Who Are Individuals)

(a)The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;

(b)If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other designee, unless the Federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.

[55 FR 21690, 21702, May 25, 1990]

15.2. Drug-Free Workplace Requirements

After assurance select a check box:



By checking this box, the state CSBG authorized official is providing the certification set out above.

15.3. CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS

Certification Regarding Debarment, Suspension, and Other Responsibility Matters - - Primary Covered Transactions

Instructions for Certification

1. By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.

2. The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.

3. The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

4. The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.

5. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.

6. The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly

enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.

7. The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusive-Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions

8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

9. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

10. Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

Certification Regarding Debarment, Suspension, and Other Responsibility Matters - - Primary Covered Transactions

(1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:

(a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;

(b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, state or local) transaction or contract under a public transaction; violation of federal or state antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

(c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (federal, state or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and

(d) Have not within a three-year period preceding this application/proposal had one or more public transactions (federal, state or local) terminated for cause or default.

(2) Where the prospective primary participant is unable to certify to any of the

statements in this certification, such prospective participant shall attach an explanation to this proposal.

**Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - -
Lower Tier Covered Transactions**

Instructions for Certification

1. By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below

2. The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other

3. The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.

4. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.

5. The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.

6. The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

7. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

8. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

9. Except for transactions authorized under paragraph five of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from

participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - - Lower Tier Covered Transactions

(1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.

(2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

15.3. Debarment

After assurance select a check box:



By checking this box, the state CSBG authorized official is providing the certification set out above.

15.4. CERTIFICATION REGARDING ENVIRONMENTAL TOBACCO SMOKE

Public Law 103227, Part C Environmental Tobacco Smoke, also known as the Pro Children Act of 1994, requires that smoking not be permitted in any portion of any indoor routinely owned or leased or contracted for by an entity and used routinely or regularly for provision of health, day care, education, or library services to children under the age of 18, if the services are funded by Federal programs either directly or through state or local governments, by Federal grant, contract, loan, or loan guarantee. The law does not apply to children's services provided in private residences, facilities funded solely by Medicare or Medicaid funds, and portions of facilities used for inpatient drug or alcohol treatment. Failure to comply with the provisions of the law may result in the imposition of a civil monetary penalty of up to \$1000 per day and/or the imposition of an administrative compliance order on the responsible entity by signing and submitting this application the applicant/grantee certifies that it will comply with the requirements of the Act.

The applicant/grantee further agrees that it will require the language of this certification be included in any subawards which contain provisions for the children's services and that all subgrantees shall certify accordingly.

15.4. Environmental Tobacco Smoke

After assurance select a check box:



By checking this box, the state CSBG authorized official is providing the certification set out above.

THE PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13)

Public reporting burden for this collection of information is estimated to average 10 hours per response, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.