



CSBG State Administrator Orientation

Session II: Frameworks
May 19, 2021



WELCOME
BACK 😊

Session 2 Agenda:

- 1:00pm-1:10pm Introduction to State Office Action Plan and Workflow
- 1:10pm-1:20pm Regulatory Framework
- 1:20pm-2:30pm CSBG 101
- 2:30pm-2:45pm Break
- 2:45pm-3:10pm CSBG 101 Cont.
- 3:10pm-3:45pm Performance Management Framework
- 3:45pm-4pm Wrap Up & Homework

State Office Key Tasks & Deliverables



Considerations

- The CSBG Act grants states authority to administer CSBG as appropriate in its own state, so...
- Every state is different!
 - Contract years; program years
 - But the Federal Fiscal Year is always October 1-September 30th
 - Processes between states vary
 - A contract process in Arkansas is different than Indiana, for instance



What is the State Office Responsible For?



CSBG State Plans



CAP Plans



Funding



Monitoring



Training and Technical Assistance



ACSI



Reporting



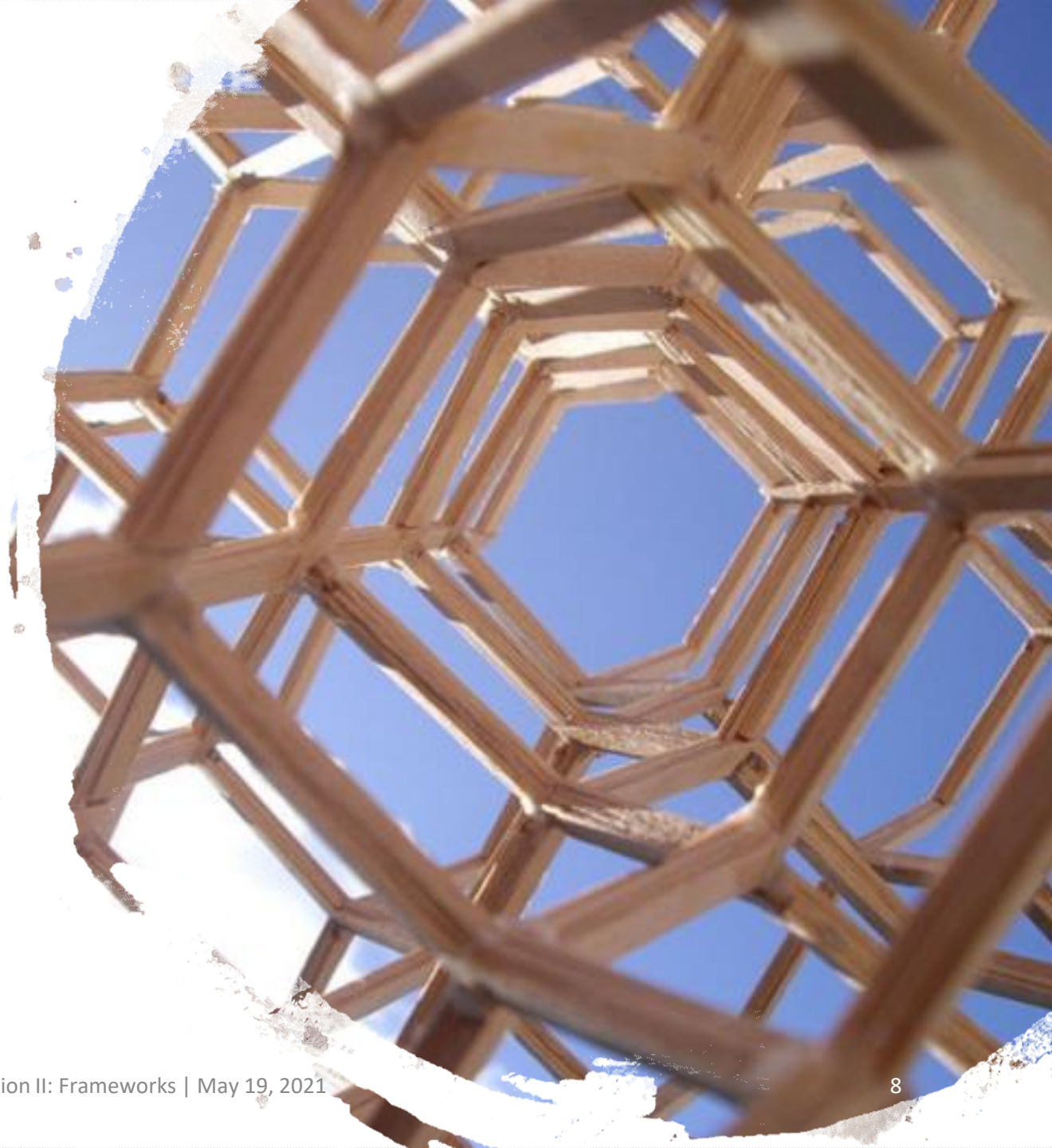
Overall State Administration

CSBG STATE OFFICE ACTION PLAN

ACTION	WHO?	WHEN?	DEPENDENCY	NOTES / QUESTIONS
A.) CAP PLANS				
A1.) Development of Plan Template				
A2.) Review & Approval				
A3.) Community Needs Assessments				Required every 3 years or more often
B.) CSBG STATE PLAN				Determine if your state uses 1 or 2 year plan
B1.) Development of Plan				
B2.) Gather Input				
B3.) Hearing				
B4.) Approval				
B5.) Submission		August 30		
C.) FUNDING				
C1.) Contracts			A2.) Review & Approval of CAP Plan	
C2.) Invoices & Reimbursements			C1.) Contracts	
D.) MONITORING				

CSBG Regulatory Framework

- CSBG Act
- Information Memoranda (IMs)
 - Non-Binding Guidance from OCS
- 2 CFR 200 - Uniform Guidance
- State Laws
- State Contracts



CSBG Act Overview

- The CSBG Act outlines:
 - Purposes and Goals
 - Definitions
 - Federal Allotment and Payment requirements
 - Uses of Funds
 - Application and Plan requirements
 - Dedesignation and Redesignation of Eligible Entities in Unserved Areas
 - Tripartite Board requirements
 - Training and Technical Assistance
 - Monitoring of Eligible Entity requirements
 - Corrective Action; Termination and Reduction of Funding requirements
 - Accountability and Reporting requirements
 - Limitations on the Use of Funds

https://www.acf.hhs.gov/sites/default/files/ocs/leg_title_iicommunity_services_block_grant_act_10271998.pdf

CSBG Information Memoranda

- CSBG IMs are non-binding guidance that give us insight into how OCS interprets the CSBG Act and other applicable requirements.

<https://www.acf.hhs.gov/ocs/resource/csbg-information-memoranda>

CSBG IM

DESCRIPTION

CSBG IM 37: Definition and Allowability of Direct and Administrative Costs

Provides guidance on using funds for the administration of other programs; direct vs administrative costs

CSBG IM 49: Program Challenges, Responsibilities and Strategies, FY 2001-2003

Establishes ROMA as a requirement for the network

CSBG IM 82: Tripartite Boards

Outlines requirements of Tripartite board membership, composition, and key functions

CSBG IM 116: Corrective Action, Termination, or Reduction of Funding

Provides guidance on the requirements and procedures for termination or reduction of funding

CSBG IM 138: State Establishment of Organizational Standards for CSBG Eligible Entities

Establishes Organizational Standards for Eligible Entities; this is the only legally-binding IM

CSBG IM 144: State and Federal Accountability Measures and Data Collection Modernization

Establishes State and Federal Accountability Measures

Uniform Guidance

2 CFR Part 200

- Standard rules for federal grants
 - Includes guidance on administrative requirements including procurement, internal control, and subrecipient monitoring; cost principles and allowability of costs; and single audit requirements.
- Not all provisions of Uniform Guidance (2 CFR §200) apply to CSBG, but many states incorporate Uniform Guidance into contracts and make it applicable when determining if a cost is allowable.
 - Basic principle is good starting place:
 - **Is it allowable, reasonable, and properly allocated*?**
 - CSBG can be used for the administration of other programs. Therefore, a cost may be covered by CSBG vs allocated to another award.
- Subpart E, Cost Principles includes selected items of cost that should be reviewed when considering allowability.



State Laws and Regulations



Due to the flexibility of the Block Grant environment, not all states have laws, regulations, or both. State administrators should familiarize themselves with their state's particular set of regulations, if any, regarding CSBG.



Most states have policies and procedures that govern the administration of CSBG and other human services work. State administrators should work to familiarize themselves with their state's policies and procedures regarding CSBG.



State contracts often incorporate by reference any CSBG Act requirements, OMB guidance, state laws and regulations, and policies and procedures. Monitoring procedures, tools, and documents then flow from these contract requirements.

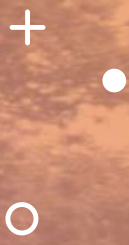
Contracts



States enter contracts with local agencies to provide CSBG services. The contract is the vehicle states use to provide funding to local agencies.



Contracts are often drawn up by fiscal, grants, or other contracts staff and include a large amount of “boilerplate” language, assurances, requirements, etc.



Knowledge Check!

A particular cost is specifically disallowed by the state CSBG contract, but is not disallowed by the CSBG Act, Uniform Guidance, or applicable state laws. Can the state update its contract terms to allow the cost?

- A.) Yes
- B.) No
- C.) Maybe, if a goat stands on three legs under a full moon



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CSBG Act 101

CSBG Purposes



Reduction of poverty



Revitalization of low-income communities



Empowerment of low-income families to become fully self-sufficient



-42 USC § 9901



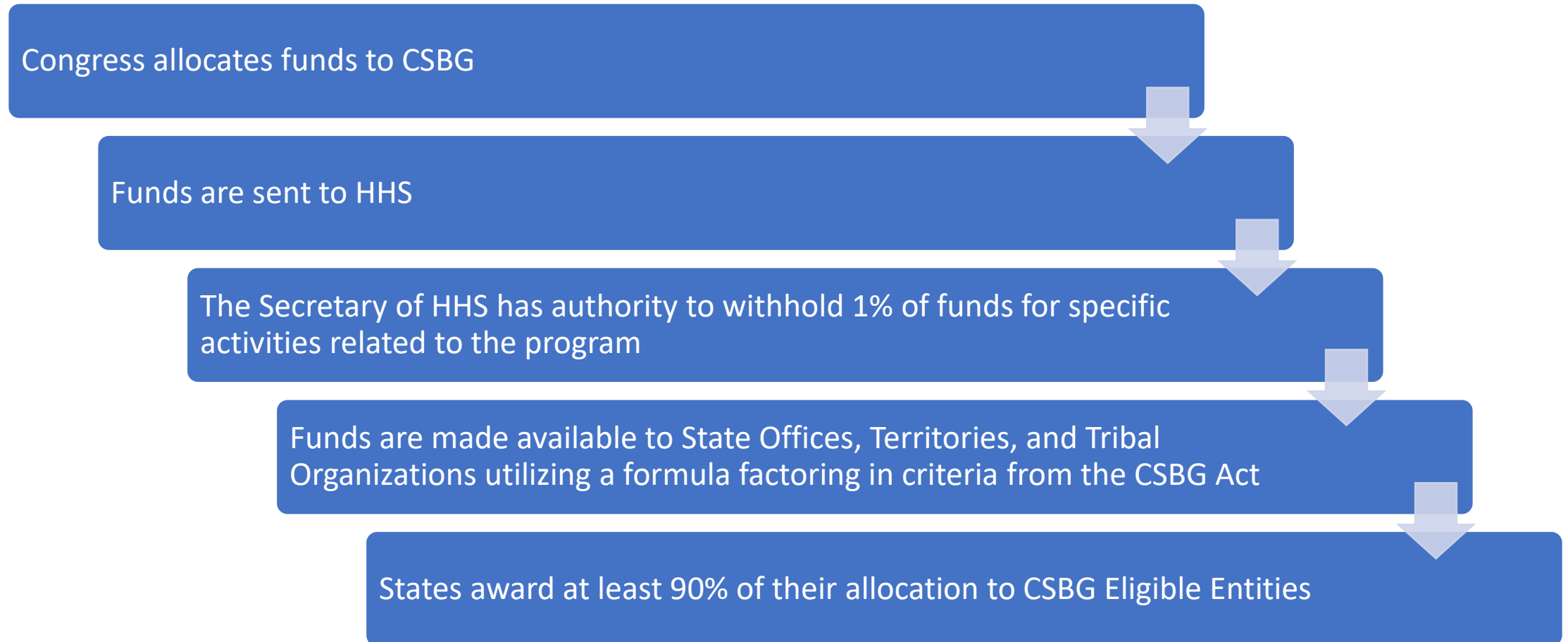
CSBG Purposes and Goals

Accomplish the purposes and goals by:

- Maximum participation of people and communities with low-incomes
- Leveraging resources of other anti-poverty programs
- Strengthening community capabilities for planning or coordinating resources for local needs and conditions of poverty
- Using innovative approaches to address causes and conditions of poverty
- Organizing services to have a measurable impact on the causes of poverty

-42 USC § 9901

How the Money Works



WHAT IS THE STATE PLAN?

- 42 U.S.C. § 9908(b)

The State Plan is our application for funding. This is a requirement of the CSBG Act.

The Plan is submitted to the Administration for Children & Families (ACF) and reviewed by the Office of Community Services (OCS).

The State Plan outlines key elements of CSBG administration for the period covered by the plan

States can submit a one year or a two year plan.

There are 15 sections to the plan; Each Section is specific to a Federal requirement.

The plan is due in OLDC at the end of August each year (typically)

What are states required to do with CSBG?

-42 USC § 9907



Must allocate at least 90% of its federal CSBG allotment to CSBG Eligible Entities



May use \$55,000 or 5% (whichever is greater) for state CSBG administrative costs



Remaining funds (“discretionary funds”) must be used for CSBG-authorized purposes

90% Funds

“SEC. 675C. USES OF FUNDS

“(a) GRANTS TO ELIGIBLE ENTITIES AND OTHER ORGANIZATIONS.—

“(1) IN GENERAL.—Not less than 90 percent of the funds made available to a State under section 675A or 675B shall be used by the State to make grants for the purposes described in section 672 to eligible entities.

“(2) OBLIGATIONAL AUTHORITY.—Funds distributed to eligible entities through grants made in accordance with paragraph (1) for a fiscal year shall be available for obligation during that fiscal year and the succeeding fiscal year, subject to paragraph (3).

-42 USC § 9907

Recapture and Redistribution

- CSBG Act has a provision allowing states to recapture and redistribute 90% funds that are unobligated at the end of the first fiscal year that exceed 20% of the amount distributed

HOWEVER

- In recent history, the Appropriations Act or Authorizing Appropriation has included language that supersedes the CSBG Act, requiring funds to stay with the entity for carryover into the next fiscal year.

What do states do with Administrative Funds?

- 42 U.S.C. § 9907(b)(2)



State Office Staffing



Monitoring Costs



General Administration Costs

Office supplies, cost of state office software licenses, etc.



Provide Training and Technical Assistance

What do States do with Discretionary Funds?

- 42 U.S.C. § 9907(b)(1)

Technology

Grants to CAAs

- Some states allocate 95% of funds instead of 90% of funds to Agencies
- Competitive grants to local agencies

Training and Technical Assistance

Fund State Association

Fund activities aligned with the purposes of CSBG not operated by CSBG Eligible Entities

Knowledge Check!

The State Office is reviewing uses of CSBG in its state to support its association. Which of the following could the state do with their funds? (Mark all that apply):

- A.) Require CAAs to use their 90% funds to fund the state association
- B.) Use state administrative dollars to fund the state association
- C.) Use state discretionary dollars to pay the association to conduct monitoring on behalf of the state



CSBG Eligible Entities



Only CSBG Eligible Entities (CEE) can receive CSBG Funding.

Eligible Entities can include:

- Private nonprofit entities
- Public entities
- Limited Purpose Agencies
- Migrant or Seasonal Farmworker Entities



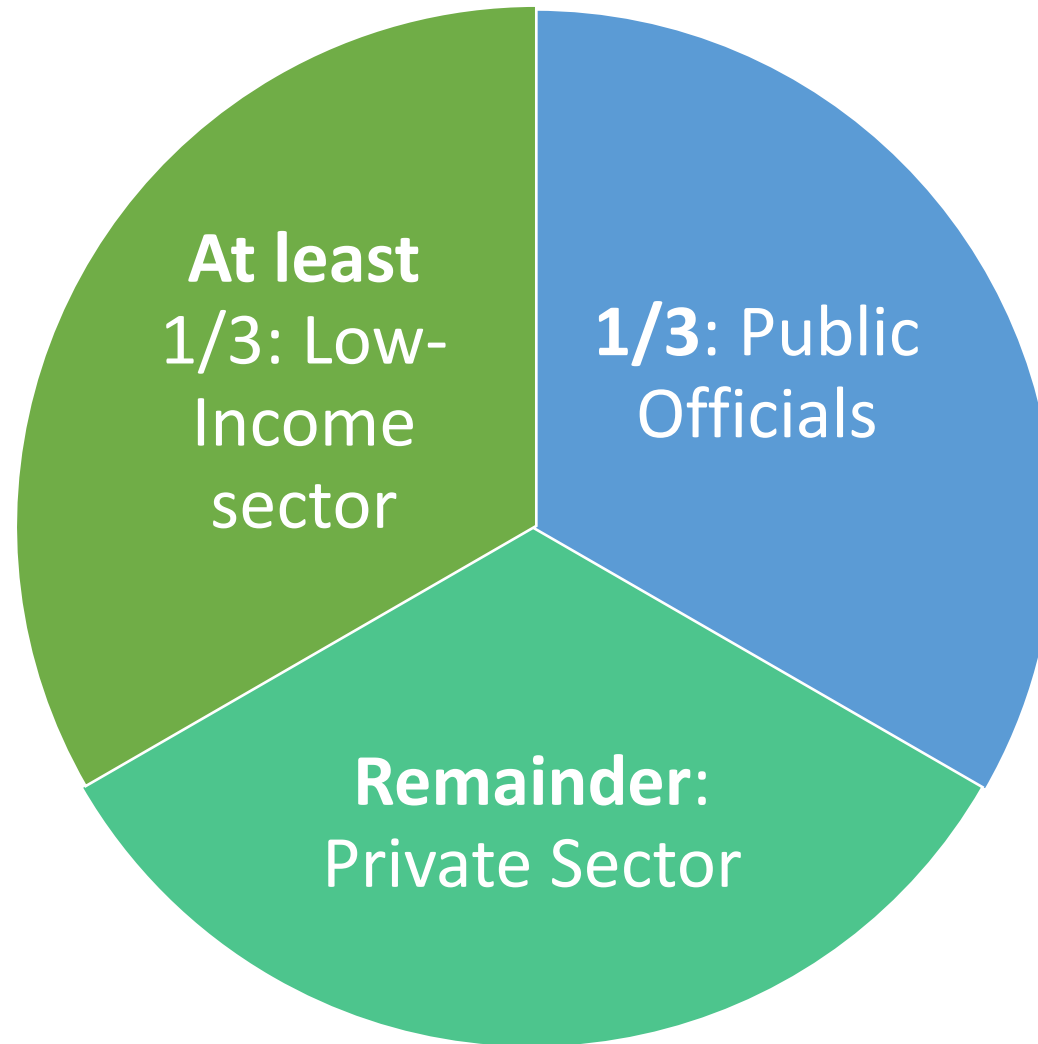
To be considered a CEE, an agency must:

Be a CEE as of the enactment of the 1998 CSBG Act or designated by the state as described in sec. 676A of the CSBG Act; and

Have a tripartite board or other mechanism as described within section 678B of the CSBG Act.

-42 USC § 9902(1)

Tripartite Board Composition



- 42 U.S.C. § 9910

Tripartite Board Composition: Considerations

People of low income or their representatives:

- Should be democratically selected
- Do not have to be low-income themselves
- Micro-democratic selection process may be allowable*

Public Officials:

- Elected officials should be holding office at the time of appointment
- If elected officials are “not available”, you may use appointed officials

CSBG IM 82 provides critical information on Tripartite Board Composition:

- <https://www.acf.hhs.gov/ocs/resource/im-no-82-tripartite-boards>

Tripartite Board Requirements: Sources

CSBG Act

State nonprofit
laws

State CSBG
statute or
regulations

Contracts with
local CSBG
eligible entities

State CSBG
policy



The Role of the Board

- Boards are required to fully participate in the development, planning, implementation, and evaluation of the program
- Boards set out the high-level vision, mission, strategic direction of the CEE
- Boards govern the entire agency, not only CSBG

Knowledge Check!

An eligible entity has 12 seats on its board.
Of them:

- 5 individuals are representatives of individuals with low-incomes;
- 4 individuals are public officials;
- 3 individuals are representatives of the private sector.

Is this board in compliance with the CSBG Act?

- A.) Yes
- B.) No





What do
Agencies do
with CSBG
Funds?

Based on their community needs
assessment, Agencies will develop
programming to meet unique
community needs.



CSBG Needs Assessment Requirements

- Agencies are required to conduct a Community Needs Assessment by the CSBG Act
 - CSBG Act requirements are limited
- Funding decisions should be based on the results of the Community Needs Assessment
- Requires broad input from the community, including people of low income themselves

- 42 U.S.C. § 9908(b)(11)

Based on those needs, agencies create Community Action Plans

- State offices are required to collect Community Action Plans from their agencies as a condition of funding.
 - The CSBG Act does not spell out the requirements for what is included in that Community Action Plan.
- Agencies use the assessment data to create their plans to respond to and meet needs.
- During Planning, the agency should consider its mission, needs, and how CSBG can be best used to address community needs.
 - Agencies should consider if the planned programs fit the purpose of CSBG and if costs are allowable.
 - Programs may support direct services to Individuals and Families or Communities.
 - Agencies may fund coordination of activities to support identified needs
 - Agencies may augment existing programs with CSBG funds based on Community Needs

- 42 U.S.C. § 9908(b)(11)
- OCS IM 37

Allowability

In a block grant environment, determinations of allowability are made at the state (not federal) level.

States are responsible for interpreting existing guidance to make determinations of cost allowability.

- CSBG Act
 - Does the expense align with the purposes of CSBG?
- CSBG Information Memoranda
- Uniform Guidance

So long as a state's determination of allowability is not "clearly erroneous", OCS should defer to the state's interpretation.

What Can't Agencies do with CSBG Funds?

Purchase or improve land/purchase, construct, or improve buildings or other facilities, EXCEPT:

For low-cost residential weatherization/other energy-related home repairs

If granted a waiver from OCS in extraordinary circumstances

Cannot use CSBG funds in any way that identifies such use with:

Partisan and nonpartisan political activities

Voter registration

Transportation to the polls

Eligibility

The CSBG Act defines the poverty line for services at 100% of the federal poverty level.


States can elect to raise the threshold to 125% of poverty.*

- **Most states elect this option**
- Through September 30, 2021, states can raise the poverty threshold to 200% FPL for both CARES and regular CSBG allocations.

There are no requirements for determining eligibility in the CSBG Act.

- States develop eligibility requirements, or defer to agencies to develop eligibility criteria.

- 42 U.S.C. § 9902(2)



Break!

Monitoring

- 42 U.S.C. § 9914

The State would monitor an agency for compliance with CSBG Act requirements as well as contract requirements and other state requirements.

- A state CSBG office is to conduct the following reviews of a CAA:
 - Full on-site review at least once every 3 years;
 - On-site review of newly-designated entities after first year;
 - Other reviews as appropriate; and/or
 - A prompt follow-up review

In addition to the reviews detailed in the CSBG Act, states must also conduct annual reviews of agency's compliance with CSBG Organizational Standards as detailed in CSBG IM 138

- This is in addition to regular reviews. Organizational Standards Monitoring does not “stand in” for the reviews required in the Act.

What if I find
something
majorly
wrong in
monitoring?



- A state must notify an agency of a deficiency, require the deficiency be corrected, and offer TTA if appropriate
 - TTA may not be appropriate in cases of fraud or other illegal activity
- A state must allow the agency an opportunity to correct the deficiency
- A state cannot move to de-designate or terminate funding from a CSBG Eligible Entity without completing these steps
 - Review CSBG IM 116 for more information

Proportional Funding



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- “(8) 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);”

- 42 U.S.C. § 9908(b)(8)

Reporting

- States are required to submit an annual report “on the measured performance of the state and the eligible entities in the state.”
- Reports should include:
 - An accounting of the expenditure of funds, including:
 - Administrative funds spent by the State and Eligible Entities
 - Funds spent by eligible entities on the delivery of direct services
 - Information on the number and characteristics of people served
 - Summary of the training and technical assistance offered by the state



-42 USC § 9917

Knowledge Check!

Which of the following requirements are included in the CSBG Act?

- A.) Needs assessments must be conducted once every three years
- B.) A state must include budget documents in Community Action Plan templates
- C.) The Annual Report must include detail on how administrative funds are spent by states

CSBG Performance Management Framework

Involves an inclusive, multi-pronged approach

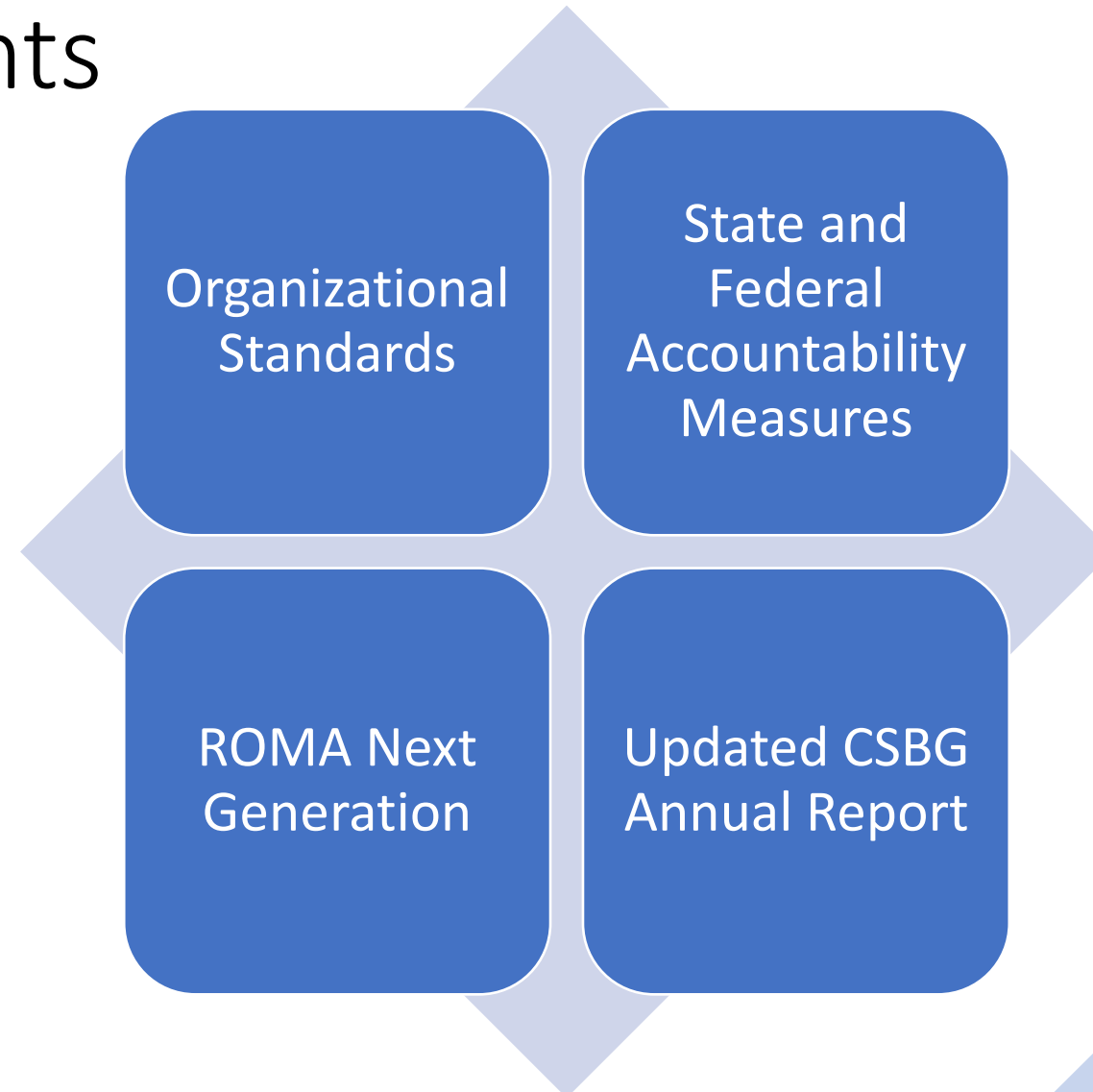
Provides accountability at 3 levels (local, state, federal)

Ensures *efficiency* and *effectiveness*

Incorporates extensive input from the CSBG Network

Demonstrates stronger results for individuals, families and communities with low-income nationwide

CSBG Performance Management Framework Components



Organizational Standards

CSBG Organizational Standards

COMMUNITY SERVICES BLOCK GRANT

Information Memorandum

U.S. Department of Health and Human Services
Administration for Children and Families
Office of Community Services
Division of State Assistance
370 L'Enfant Promenade, S.W.
Washington, D.C. 20447

Transmittal No. 138

Date: January 26, 2015

TO: State Community Services Block Grant (CSBG) Administrators, U. S. Territory CSBG Administrators, Eligible Entities, and State Community Action Associations

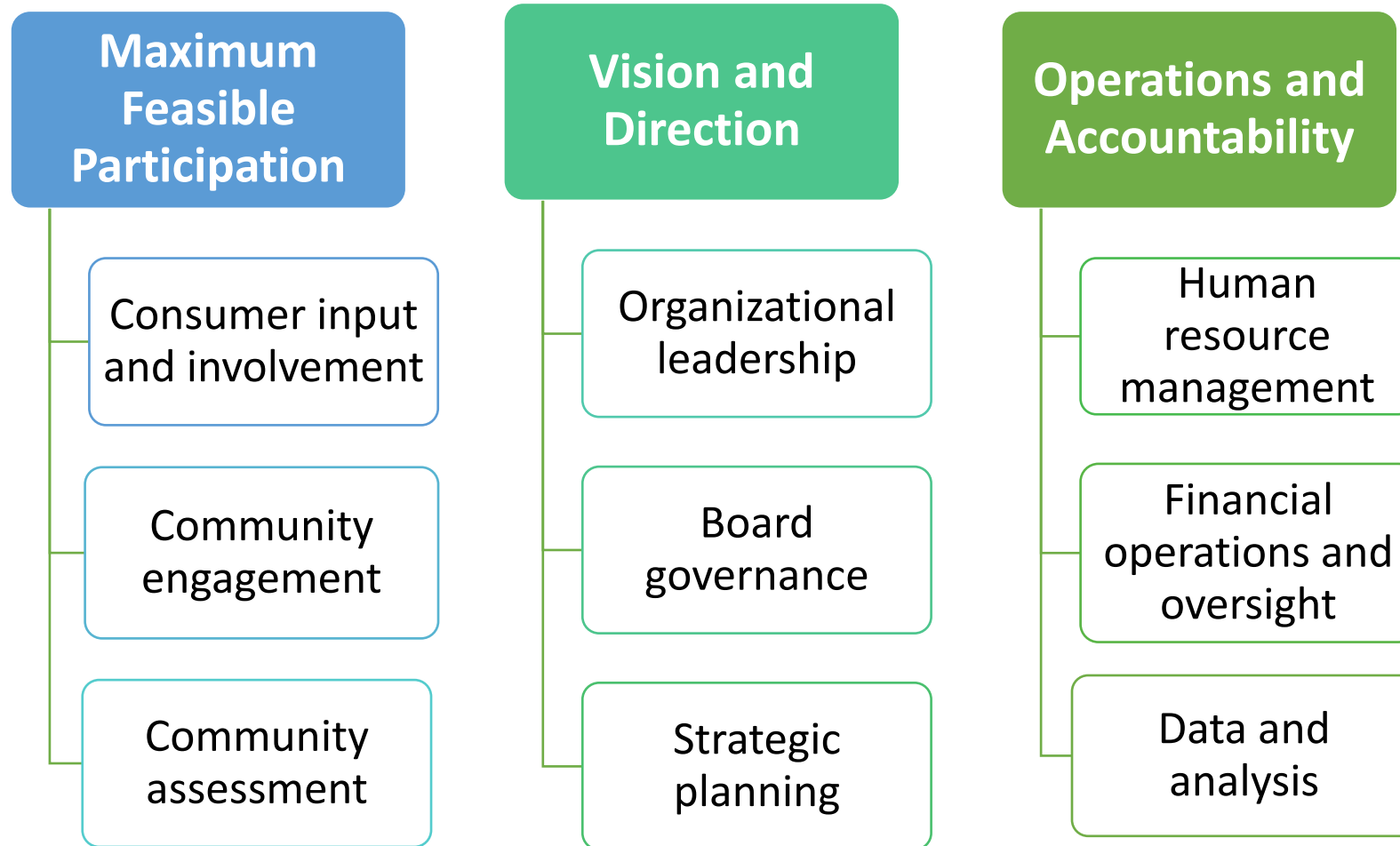
SUBJECT: State Establishment of Organizational Standards for CSBG Eligible Entities under 678B of the CSBG Act, 42 U.S.C. § 9914

- IM 138 established org standards
 - 58 Private CAAs
 - 50 Public CAAs

- It is the state's role and responsibility to ensure Eligible Entities are implementing the standards to local organizational capacity.

CSBG Organizational Standards

Organized into three thematic groups



Considerations for Standards

- Intended to be “Met/Not Met”
- Designed to create a consistent measure of quality across states and agencies
- Make clear Community Action’s longstanding commitment to accountability
- States will need to project on standards to be met in State Plans and report out to OCS on progress of standards in the CSBG Annual Report.



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State & Federal Accountability Measures

(State Plan, Annual Report Module 1, ACSI Survey)

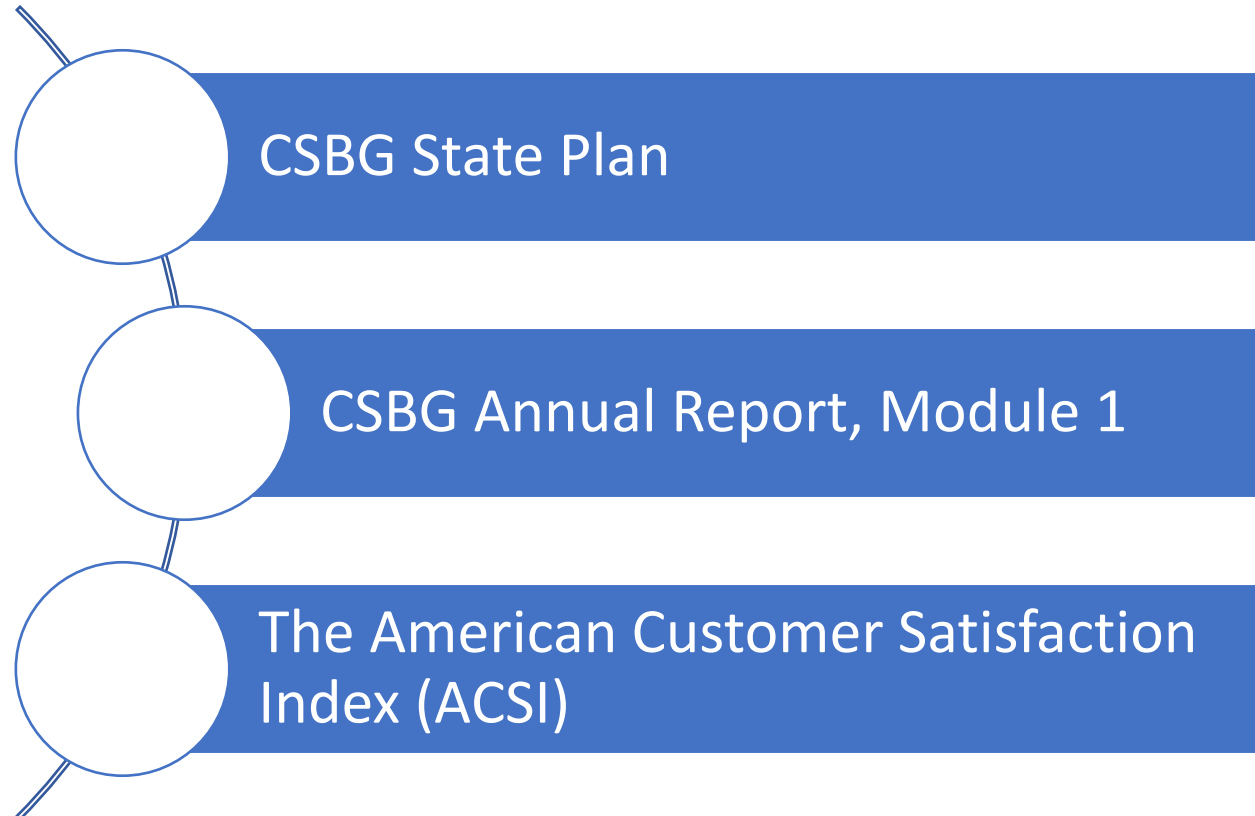
State Accountability Measures

- Developed to:
 - Track, measure, and improve performance by State CSBG Lead Agencies;
 - Capture performance data about the critical activities and functions performed at the State level;
 - Demonstrate how efficiently and effectively a State implements the activities described in their State plan; and
 - Connect the State's efforts with the performance of local eligible entities.

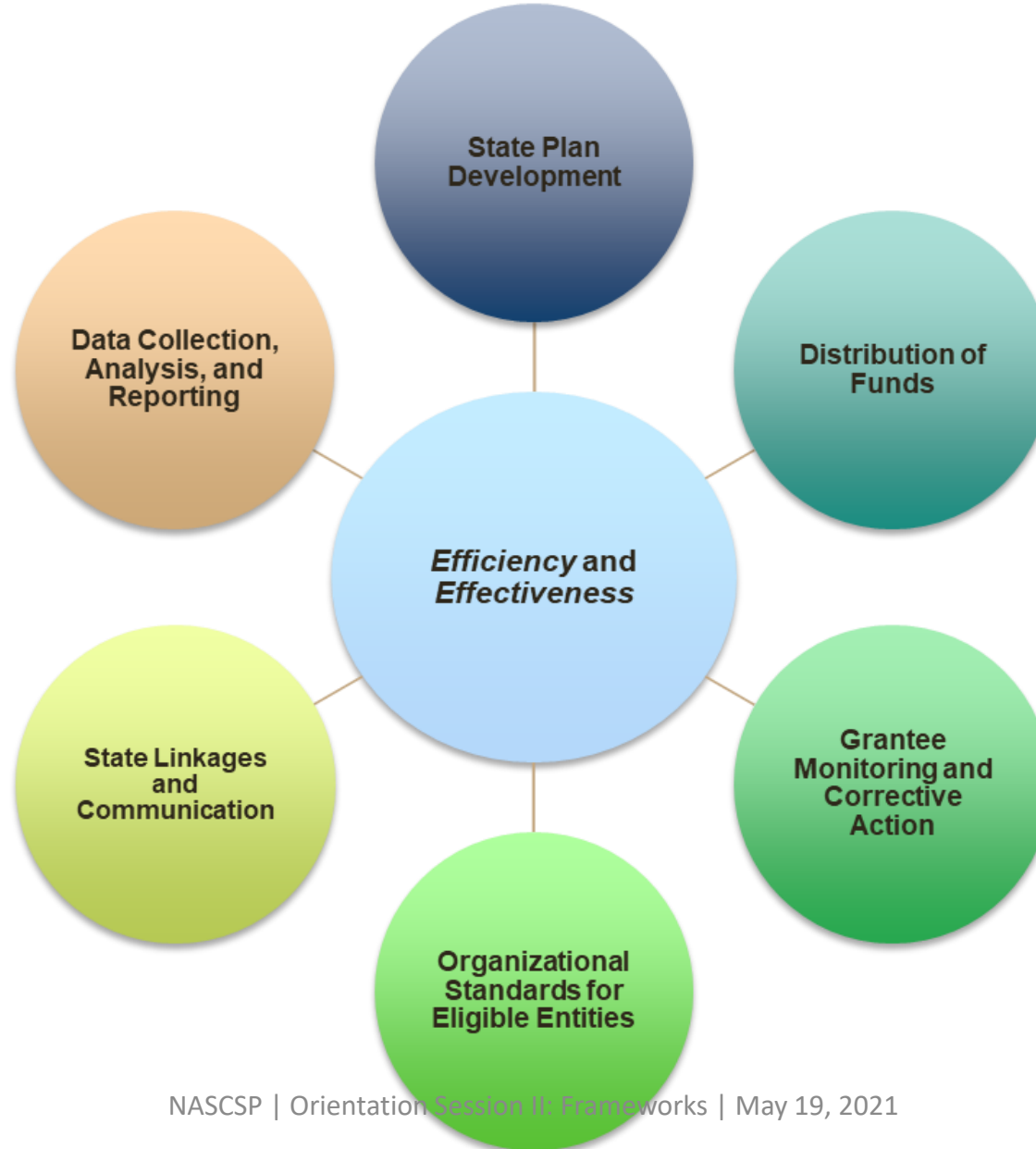
COMMUNITY SERVICES BLOCK GRANT	U.S. Department of Health and Human Services Administration for Children and Families Office of Community Services Division of State Assistance 370 L'Enfant Promenade, S.W. Washington, D.C. 20447
Information Memorandum	
Transmittal No. 144	Date: October 2, 2015
TO:	State Community Services Block Grant (CSBG) Administrators, U. S. Territory CSBG Administrators, Eligible Entities, and State Community Action Associations
SUBJECT:	State and Federal Accountability Measures and Data Collection Modernization

State Accountability Measures

- State accountability measures are collected using three mechanisms:



State Accountability Measures





- OMB-approved for government-wide use
- Allows for the collection of consistent and uniform information
- OCS uses ACSI to survey all states and territories on OCS performance and assess eligible entities on state performance
- Initial scores set baseline and identify priority areas for improvement for OCS and the states
- Recent surveys:
 - **Most recent state survey closed in March 2021**
 - 2015, 2017, 2019 surveys

American Customer Satisfaction Index (ACSI) Survey

ACSI

- Use feedback to improve the following:

Monitoring and Corrective Action

Development of the State Plan

Linkages and Communication

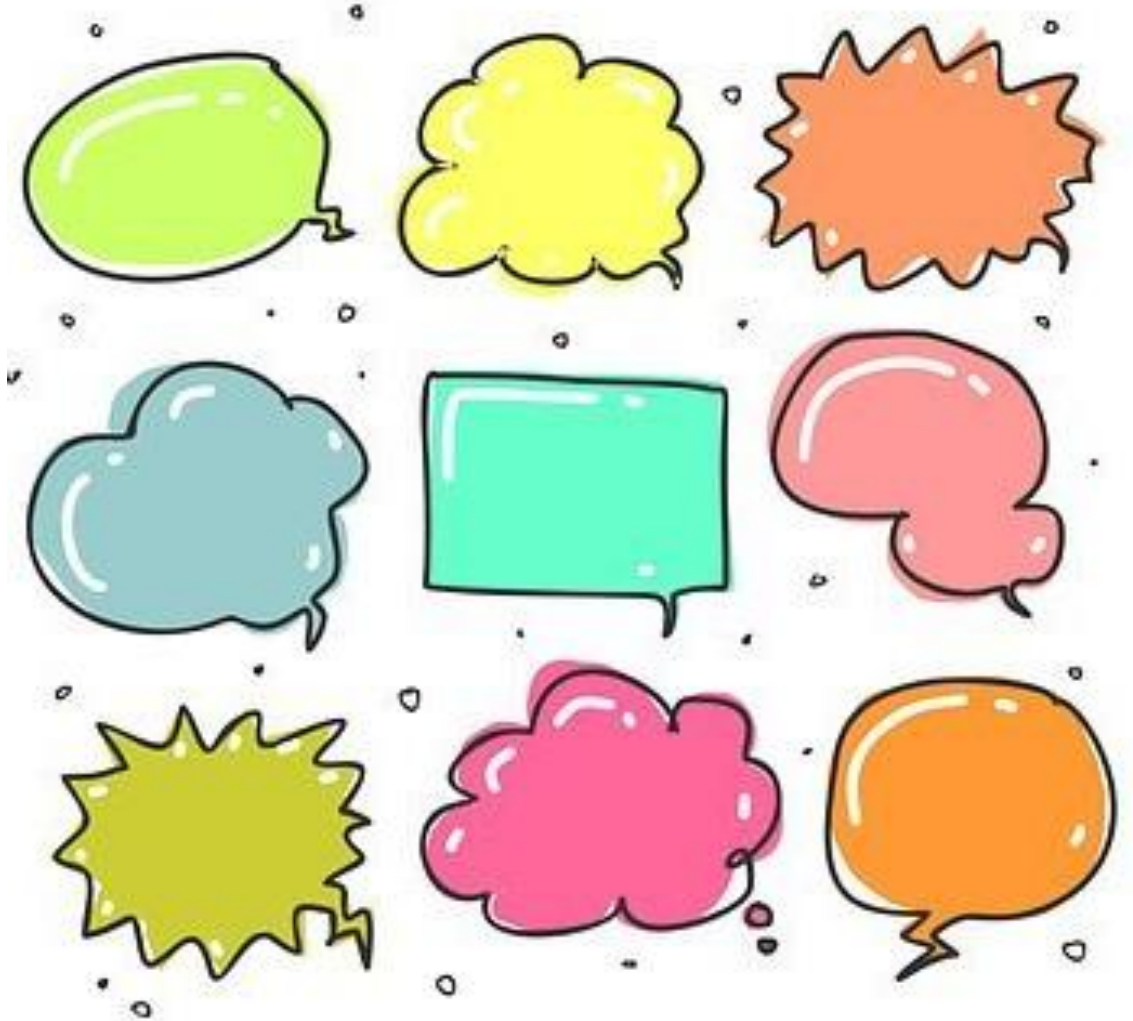
Training and Technical Assistance

Distribution of Funds

Use of Discretionary Funds

Quick Chat

- Based on the feedback you received in your ACSI report, what are some improvements you will make?



Federal Accountability Measures

State Plan
Review and
Process

Distribution of
Funds

Grant Monitoring
and Corrective
Action

Data Collection,
Analysis, and
Reporting

Organizational
Standards

Training and
Technical
Assistance

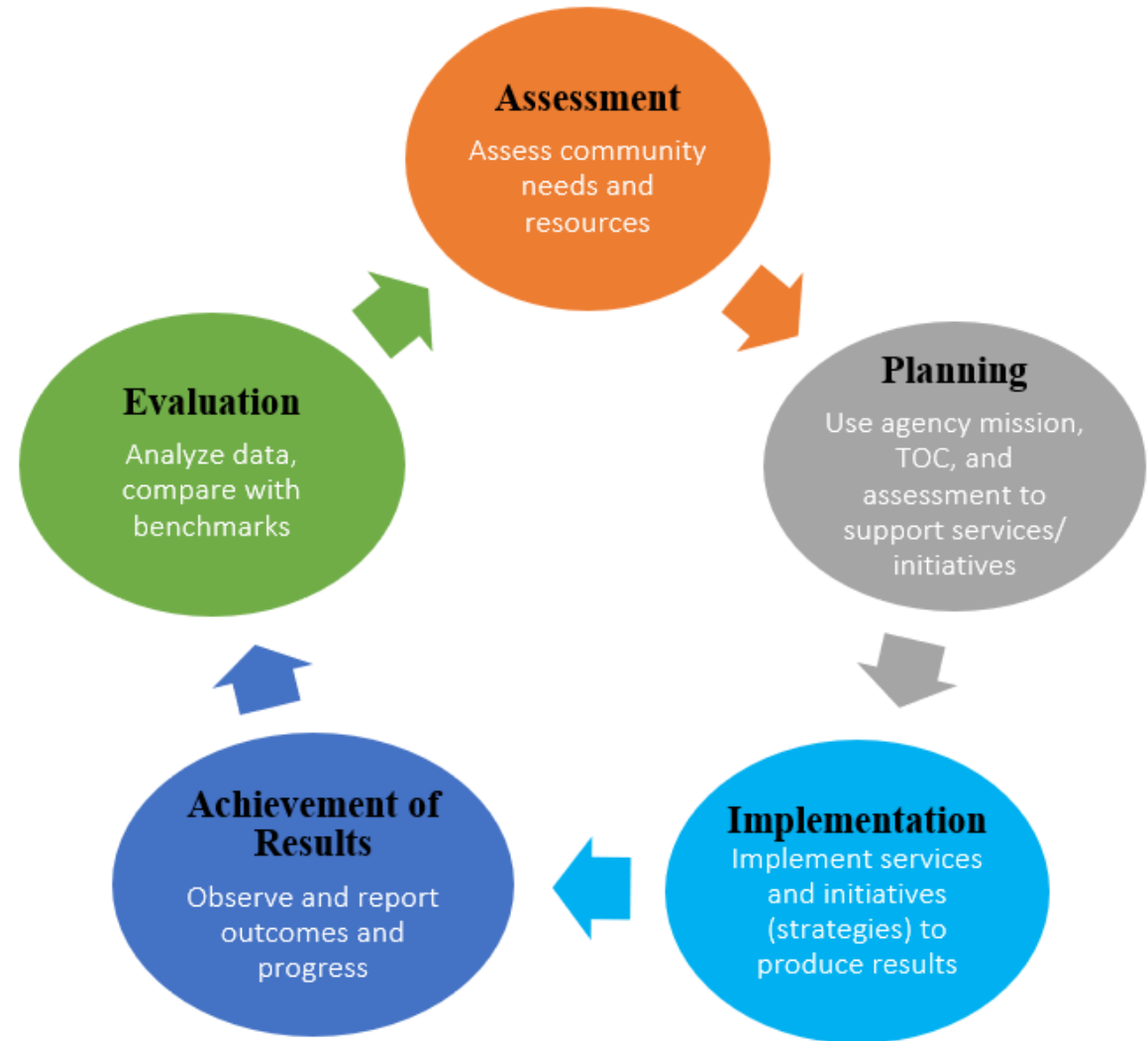
Communications

Grantee
Satisfaction

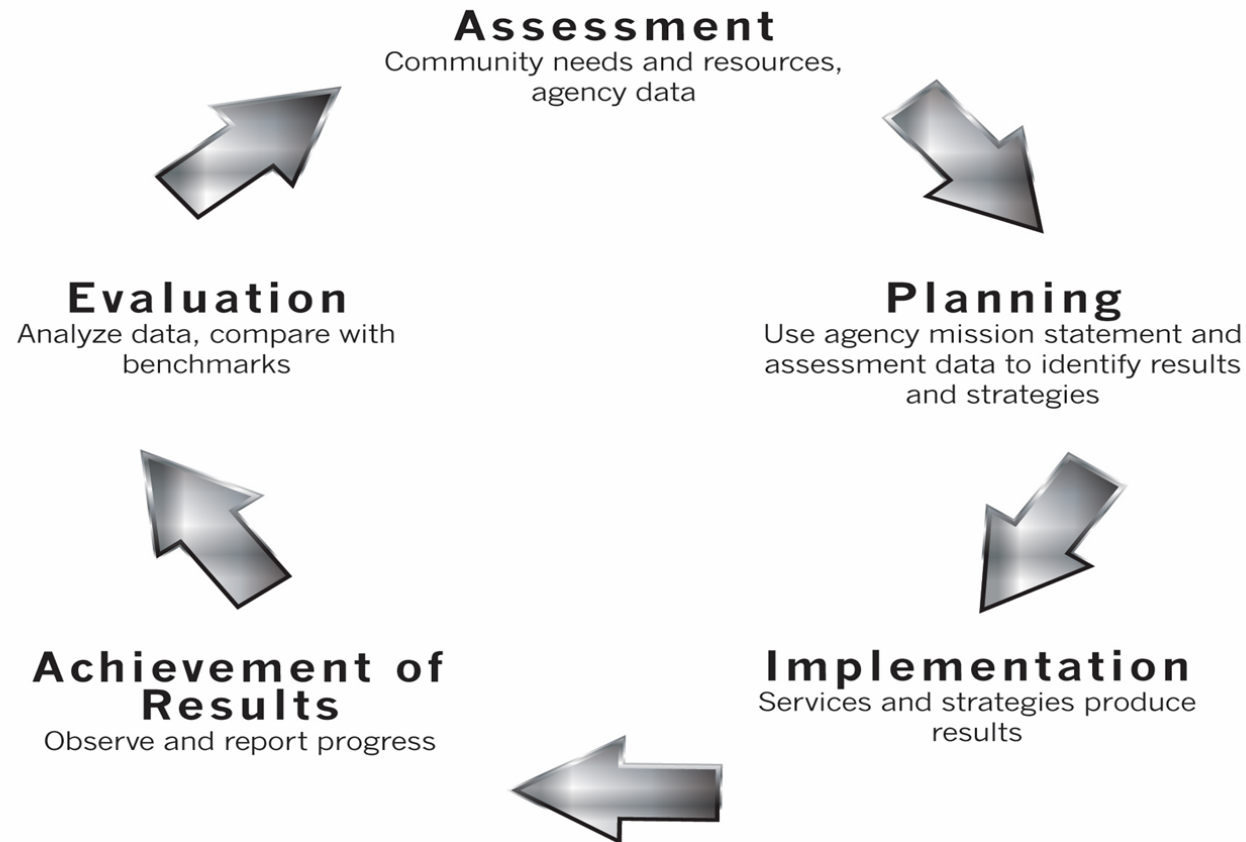
ROMA Next Generation

Building on the ROMA Foundation

ROMA has provided local entities with a means of not only "telling their story better," but of "telling a better story." ."



The Results Oriented Management and Accountability Cycle



Results Oriented Management and Accountability (ROMA) has been identified as the standard performance management system used by Community Action Agencies and other Eligible Entities as part of the conditions of receiving federal Community Service Block Grant (CSBG) funding.

CSBG IM #49 Program Challenges, Responsibilities and Strategies, FY 2001-2003

Published: May 31, 2001

Audience: [Community Services Block Grants \(CSBG\)](#)

Category: [Guidance, Policies, Procedures, Information Memorandums \(IM\)](#)

NASCSP | CSBG Frameworks | June 8, 2021

ROMA

A system for continuous quality improvement enabling the Community Action network to measure, analyze, and communicate performance.

ROMA Next Generation

A system for continuous quality improvement enabling the Community Action network **at all levels (local, State, Federal)** to measure, analyze, and communicate performance.

OCS, States and CAAs use performance data to achieve greater stability and economic security for families and communities.

Key Additions to ROMA

National Theory of Change (TOC)

Local TOCs

CSBG Annual Report

Increased focus on community level work

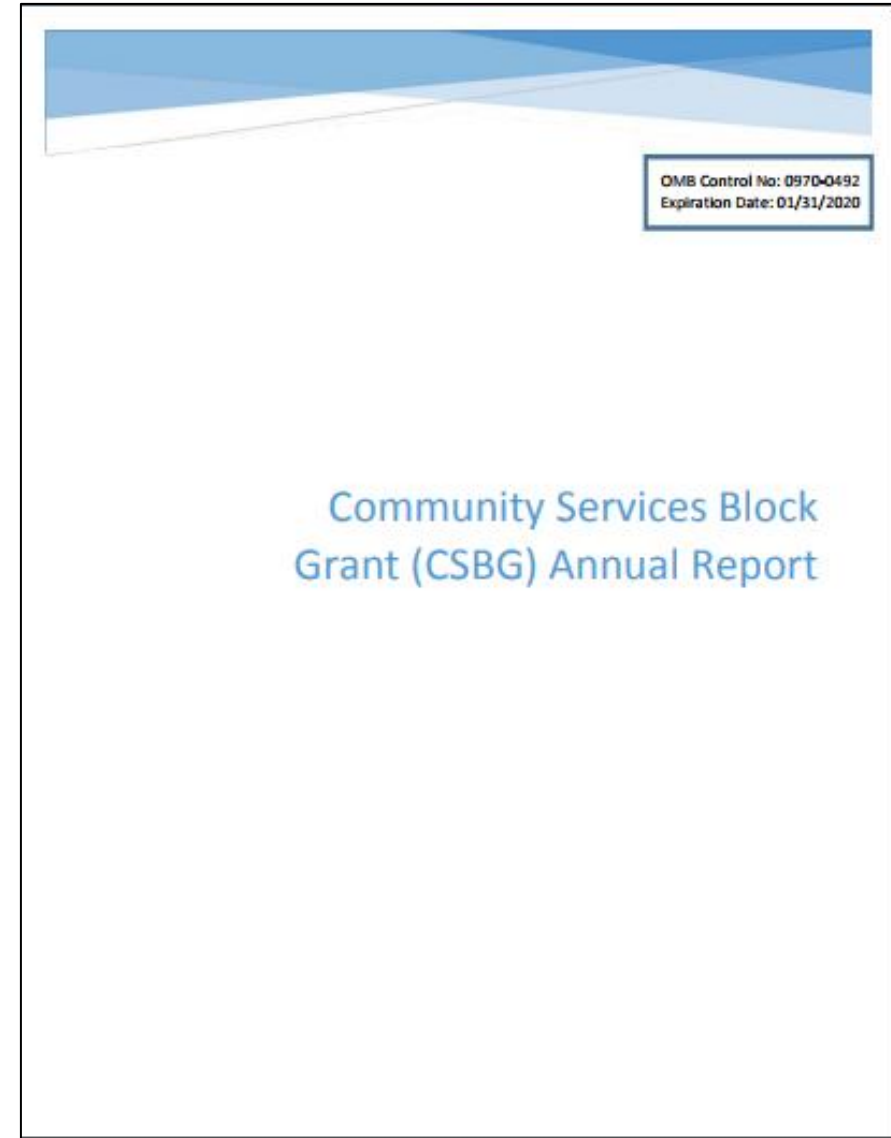
Increased focus on analysis and use of data

Emphasis on the integration of all phases of the ROMA cycle

Updated Annual Report

CSBG Annual Report

Actualizes the Performance
Management Framework as
the vehicle that moves the
framework forward



Role of the CSBG Annual Report



Fulfills CSBG Act requirements.



State Plans are required and indicate how the State *plans* to operate CSBG and use CSBG funding.



Annual Reports are required and indicate how the state *actually* operated and used CSBG funding.



Provides information on State progress with organizational standards and state accountability measures



Provides information for OCS, State and local CAAs to use to manage and improve results.

CSBG Annual Report

Module 1

- State Administration

Module 2

- CSBG Eligible Entity Expenditures, Capacity, and Resources

Module 3

- Community Level

Module 4

- Individual and Family Level

Knowledge Check!

Who does the Performance Management Framework apply to?

- A.) Local Eligible Entities
- B.) State Offices
- C.) OCS
- D.) All of the above



HOMework?

YOU'VE GOTTA BE KITTEN
ME.

Wrap Up & Homework

- Reflection
 - What's something you learned today?
 - What's an action step that you will take as a result of something you heard today?
- Homework
 - Review your ACSI feedback
 - Fill in any information you can on the ACSI portion of the State Management Action Plan