



CSBG State Administrator Orientation

Session IV: State Management
Practices

June 2, 2021





WELCOME
BACK 😊

Session 4 Agenda:

- 1:00pm-1:15pm Setting Clear Expectations
- 1:20pm-1:40pm Contracting
- 1:40pm-2:30pm Monitoring and Oversight
- 2:30pm-2:40pm Break
- 2:40pm-3:30pm CSBG Annual Report
- 3:30pm-3:50pm T&TA
- 3:50pm-4pm Wrap Up & Homework

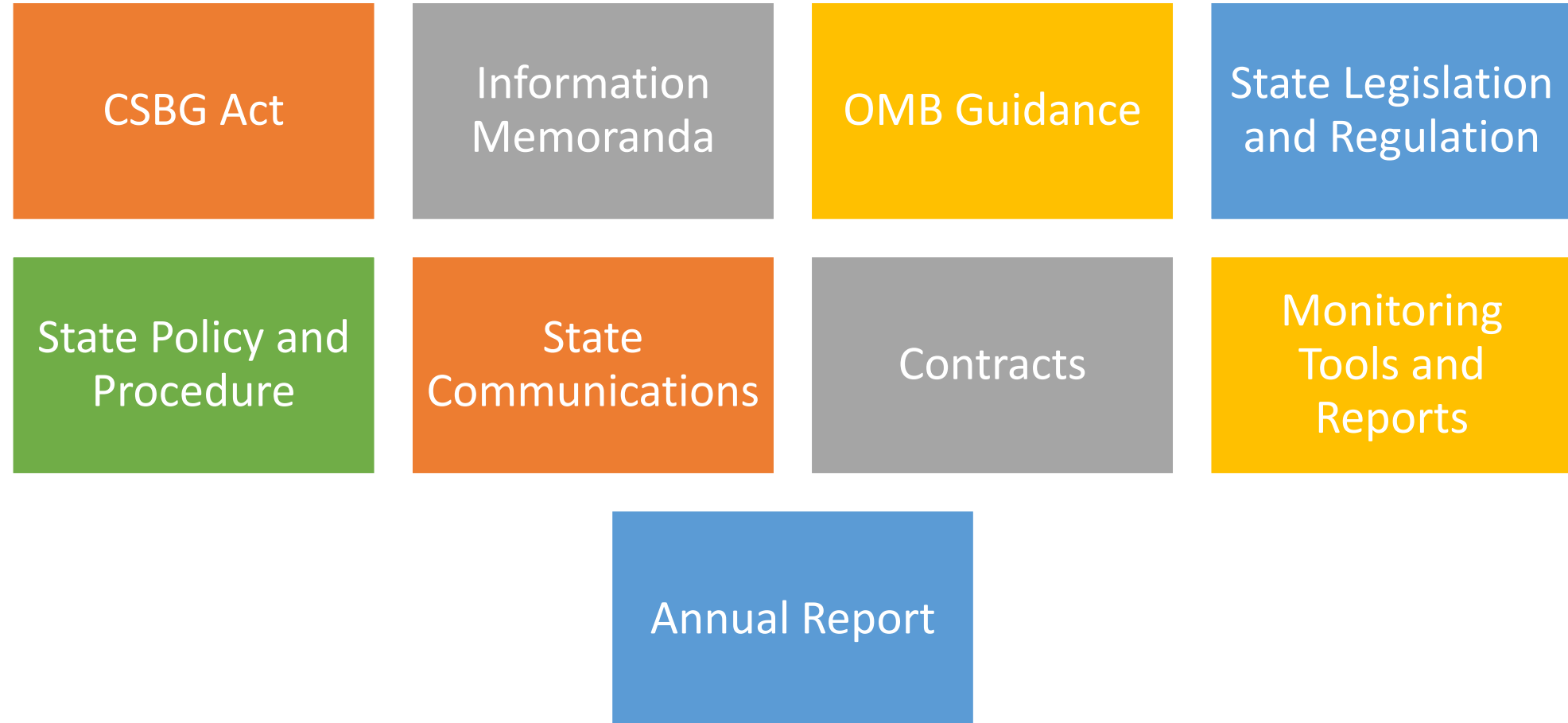


Setting Clear Expectations

Many of the difficulties
we experience working
with our network can
be traced to unclear or
poorly communicated
expectations



Expectation Sources



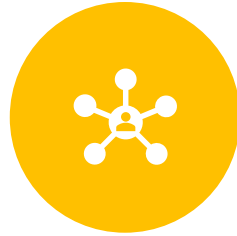
How can we address the disconnect?



IDENTIFY
CONSISTENT OR
RECURRING ISSUES
FOR CORRECTIVE
ACTION



COLLABORATE
WITH YOUR
NETWORK ON
POTENTIAL
SOLUTIONS



INVOLVE THE
NETWORK IN
ANNUAL REVIEWS
OF POLICY,
PROCEDURE, AND
RESOURCES THAT
AFFECT THEM



INCORPORATE
THEIR FEEDBACK
WHERE POSSIBLE



DEVELOP TOOLS
AND RESOURCES
THAT ENABLE THE
NETWORK TO
MORE
COMPLETELY,
EFFICIENTLY AND
EFFECTIVELY MEET
STATE OFFICE
REQUIREMENTS



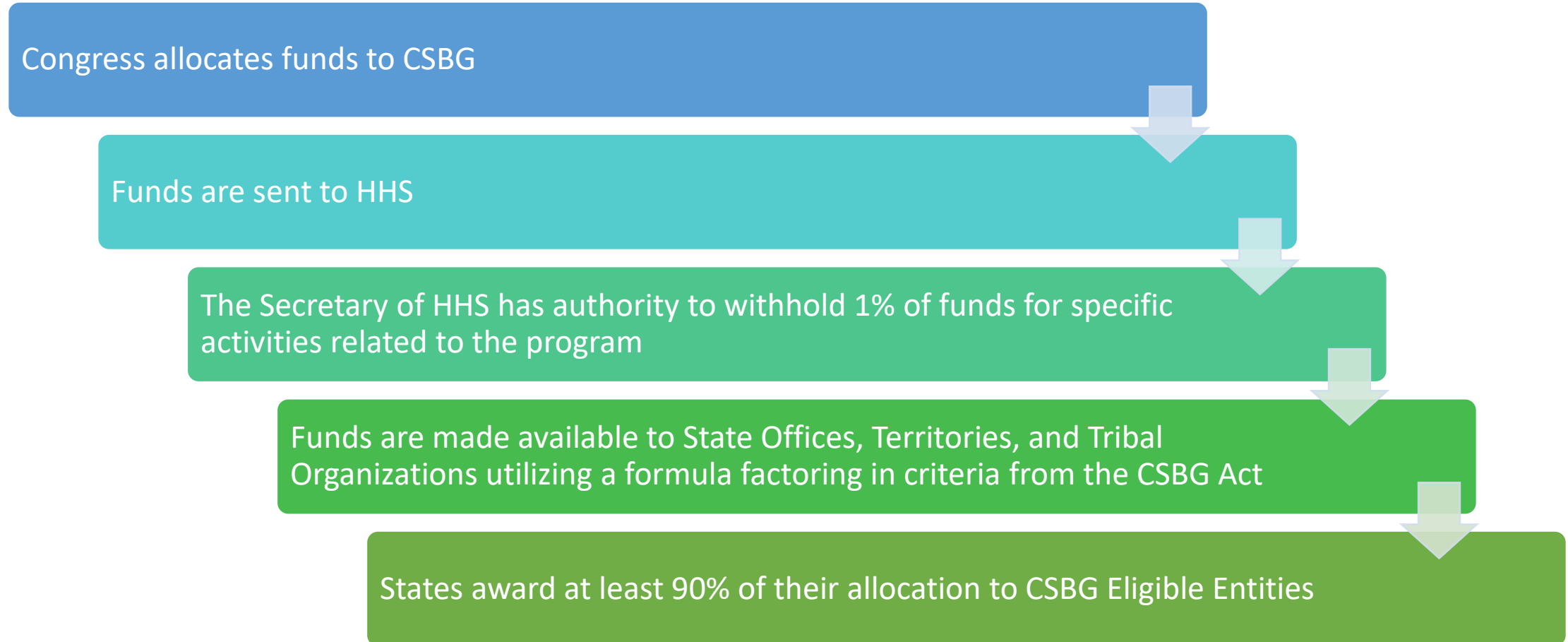
Discussion

How do you work to ensure expectations are clearly articulated and understood in your state?

An illustration on a teal background featuring two overlapping white documents with horizontal lines. A magnifying glass with a yellow handle and a blue lens is positioned over the documents. To the right of the magnifying glass are two pens: one red and one green, both with silver barrels and sharpened tips.

Contracting

From the Beginning: How the Money Works



What are states required to do with CSBG?



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

Wait, how do I divide up my 90% funds?

- Funding Formulas are used to divide 90% funds amongst agencies
 - State regulations or statute may detail state formula
- Types of Formulas
 - Historic
 - Base + Formula
 - Formula Alone
 - Formula with Variables
 - Hold Harmless + Formula
- Revision to formulas is a significant process – Cannot be done overnight



Contracts



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- Contracts are the agreements that provide funding to agencies and delineate requirements for the funding
- Contract Periods
 - The Contract Period may align with the calendar year, federal fiscal year, or state fiscal year
 - Different states use different lengths of contract
 - One Year
 - Two Year
 - More!

A Reminder about CSBG



- 90% funds allocated to agencies should remain available for obligation by the agency for the fiscal year and following fiscal year
 - Recapture and redistribution is no longer allowable due to provisions in the Appropriations Act.

Contracting



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.

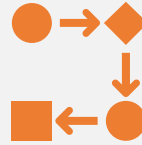


Contracting processes can be lengthy— identify how long your contract staff needs to create and route contracts internally. Also, work with your local agencies to understand how long they need to sign a contract.



Ensure you and your agencies understand all elements of the contract. If there are changes from a prior year contract, make sure agencies are aware and their input has been considered.

A note about timelines....



The Community Needs Assessment is required to complete a CAP plan; the CAP plan is required for contracting; Contracts are required in order to allow agencies to either receive advances or bill for reimbursements.

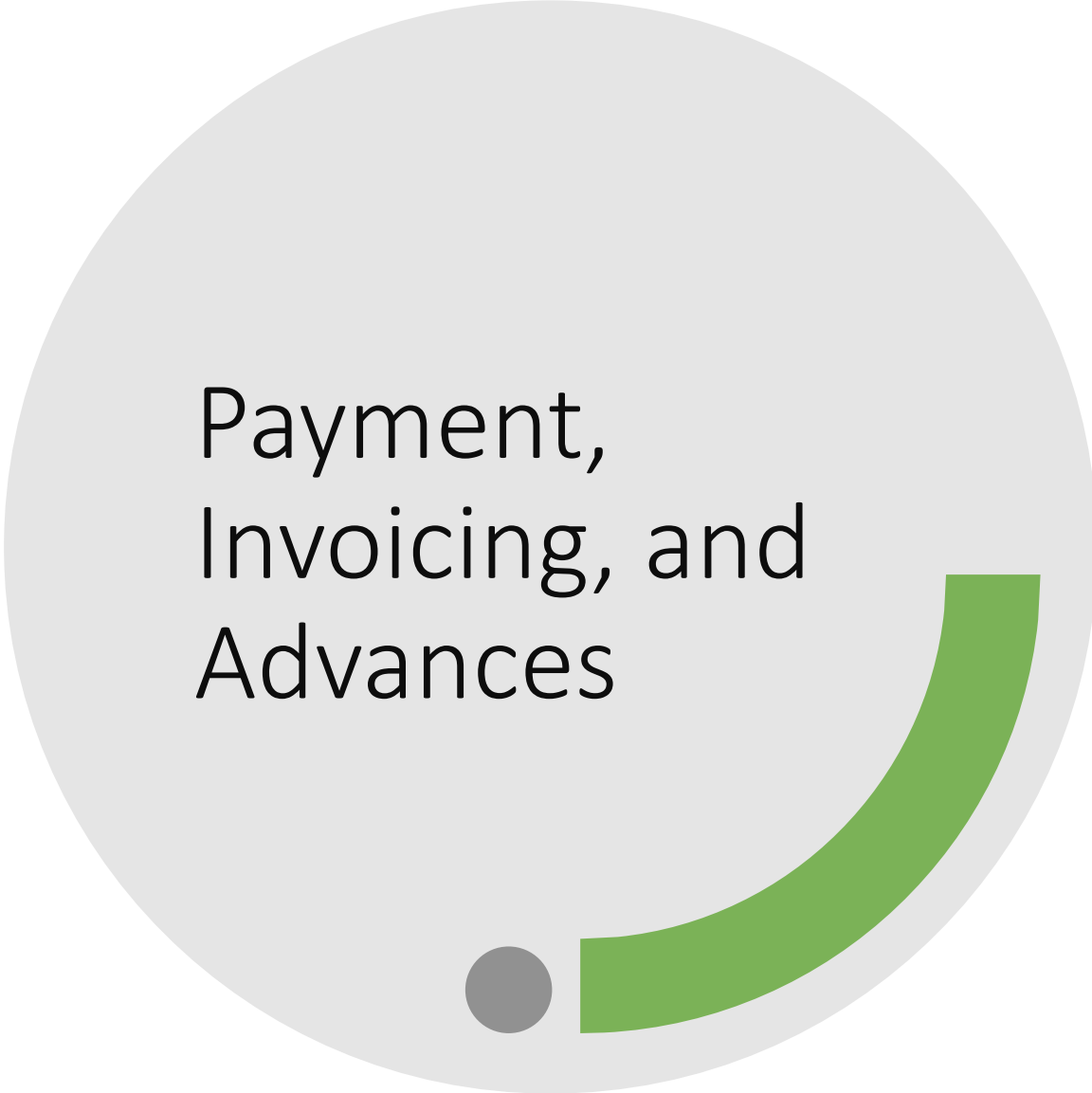


Before making changes to any of these processes, ensure you are mindful of the impact on timelines for agencies



Have conversations early with your contracting staff to prevent last minute surprises.

- After agencies have executed contracts, they can begin offering services.
- Agencies can access the funds in their contracts either via advances or reimbursement, as outlined in the contract.



Payment, Invoicing, and Advances

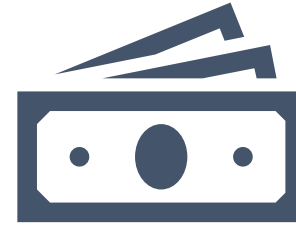
Advances vs Reimbursement



Advances provide agencies some portion of funds upfront to allow them to begin operating immediately.

Agencies must invoice for the current advance before they can receive another or begin regular reimbursement invoicing.

Advances can create challenges when an agency uses the funds for something that is disallowed.



Reimbursement invoicing requires agencies to outlay funds first for services and then request reimbursement from the state.

Reimbursement invoicing can create a cashflow pinch for agencies.

Reimbursement invoicing can be less risky as the state can review expenses prior to providing funds to the agency (however, be mindful of withholding funds).

Oversight & Invoicing

States should review invoices to ensure:

- Agencies are spending down funds
- Agencies are spending on allowable costs
- Agencies are adhering to their plan & budget
- The math adds up!

What if an agency is not spending or I notice something looks wrong?

- Start a conversation!
- If something looks really off, consider reviewing and adjusting monitoring schedule

Knowledge Check!

Which of the following can the state do to maintain oversight of CSBG?

- A.) Pay agencies on a reimbursement basis only
- B.) Require documentation of payments made with advance funds prior to releasing another advance
- C.) Pay high-risk agencies on a reimbursement basis only



Eligible Entity Monitoring



Three Primary Goals of Monitoring

- To gain a general overview, or "big picture," of the grantee's work
- To verify compliance with federal as well as state rules and regulations
- To foster partnership through an approach to the monitoring process that facilitates an open discussion between state office staff and grantee staff

State Monitoring of CAAs

- A state CSBG office is required 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 if a CAA fails to meet goals, standards, and requirements established by the state
- U.S.C. § 9914



Risk Assessment & Monitoring Schedule

- States are required to conduct risk assessments of grantees
- This risk assessment should inform your monitoring schedule
 - Split agencies between three years
 - Agencies to visit first = high-risk and/or low previous monitoring score
- Schedule monitoring trips and share at beginning of program year:
 - Avoid bad weather
 - Avoid national and state association conferences
 - Plan at least two weeks in between agencies
 - Consider other major deliverables or events

Risk Level	Triggers	Action
Low	<ul style="list-style-type: none">• Observations• Feedback from other divisions	<ul style="list-style-type: none">• Check on next quarterly review
Medium	<ul style="list-style-type: none">• Board issues• Infrastructure issues within case management services	<ul style="list-style-type: none">• Add desk review• Depending upon desk review findings, may add on-site monitoring
High	<ul style="list-style-type: none">• Disallowed costs• Repeat compliance issues• Turnover of executive staff	<ul style="list-style-type: none">• Take priority• Add to on-site monitoring• Kept on more frequent monitoring until issues resolved

NOTE: All agencies are monitored on-site at least every 3 years

Monitoring

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

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.

State Monitoring of CAAs

- State CSBG office will monitor an eligible entity on:
 - Performance goals;
 - Administrative standards;
 - Financial management requirements; and
 - Other state requirements
- CSBG terms and conditions

The Monitoring Tool

- Develop the tool based on the requirements from the Act, Contracts, State Regs, Policy, etc.
 - Pro Tip! Include the legal reference
- Share the tool with agencies in advance of monitoring
- Check out peer tools on the NASCSP Member Portal: <https://nascsp.org/member-resources/csbg-member-only-resources/peer-to-peer-requests/monitoringtools/>



The Monitoring Process

Use Risk Assessment to inform monitoring schedule

- Share monitoring schedule with agencies if possible*

Develop/update monitoring tool for the year

Send announcement letter, at least 30 days in advance

- Identify Contracts and timeframes to be monitored
- Specific documentation to submit for desk review with due date
- Confirm dates for on-site monitoring*
- Ensure Monitoring Tool(s) and expectations are shared in advance

Perform review

- Financials: budgets, general ledgers
- General: policies and procedures
- Procurement: property management
- Board items: Minutes, rosters, vacancies
- Performance and Client Files

Exit Interview

Complete monitoring report

- Send completed monitoring report to agency within 60 days of completion of monitoring
- Clearly identify findings, observations, opportunities for improvement, and notable practices
- For findings, develop corrective action plans in partnership with agencies with required actions and timelines for remedy

Monitoring Requirements

- **Monitor a CAA and conduct follow-up reviews as necessary;**
- **Inform a CAA of a deficiency and require the CAA to correct it;**
- **Provide training and technical assistance to the CAA and accept or reject quality improvement plans developed by the CAA;**
- **Take action up to and including de-designation as a last resort**



Dedesignation, Reduction, Termination of Funding

The state assures it will not reduce or terminate funding without notice and an opportunity for a hearing, regardless of the reason for the reduction or termination.

For more information on Dedesignation and Termination of Funding, consult CSBG IM 116.

Some Thoughts about General Oversight

Standard 3-year monitoring schedule

High-level reviews are performed for early prevention. This might consist of:

- Quarterly Program Report Reviews
- Audit Reviews
- Review of Complaints
- Review of Prior Monitoring Issues

CAAs identified for more frequent on-site review based on a Risk-Assessment:

- Programmatic Risk
- Administrative Risk
- Fiscal Risk

NASCSP Monitoring Standards

NASCSP's Guiding Principles for Monitoring

- Mutual Respect
- Open Communication
- Joint Problem Solving
- 'Whole agency' systems approach

<https://nascsp.org/csbg/csbg-resources/performance-management/monitoring/>





NASCSP Monitoring Standards

- State monitors should look at more than just compliance with program rules and regulations.
- Ensure the Board fully understands their roles and responsibilities.
- Monitoring community action agencies is part of a process to strengthen CAAs and the entire Community Action network.
- The State CSBG Office must have a system in place to document and inform the agency of findings and/or deficiencies.
- The State CSBG office has a system in place to provide training and technical assistance when necessary.

Keys to Success


- “Enculturate” NASCSP Monitoring Principles.
- Be responsive, transparent, and communicative.
- Provide access to Training and Technical Assistance resources.
- Use competent, trained, and supported monitoring staff.
- Value the brilliance of your network.
- Strong technical and ethical characteristics are fundamental to monitoring success.
- Remember “why” we monitor and place a priority on the benefits it can offer to the agencies and entities we support.



Group Discussion

Considering the monitoring principles, practices, and characteristics just discussed:

- How can you incorporate these into your state monitoring?
- What are the strengths of your monitoring?
- What are your challenges?
- What can you do better?
- What would you like to change?



Break!

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.

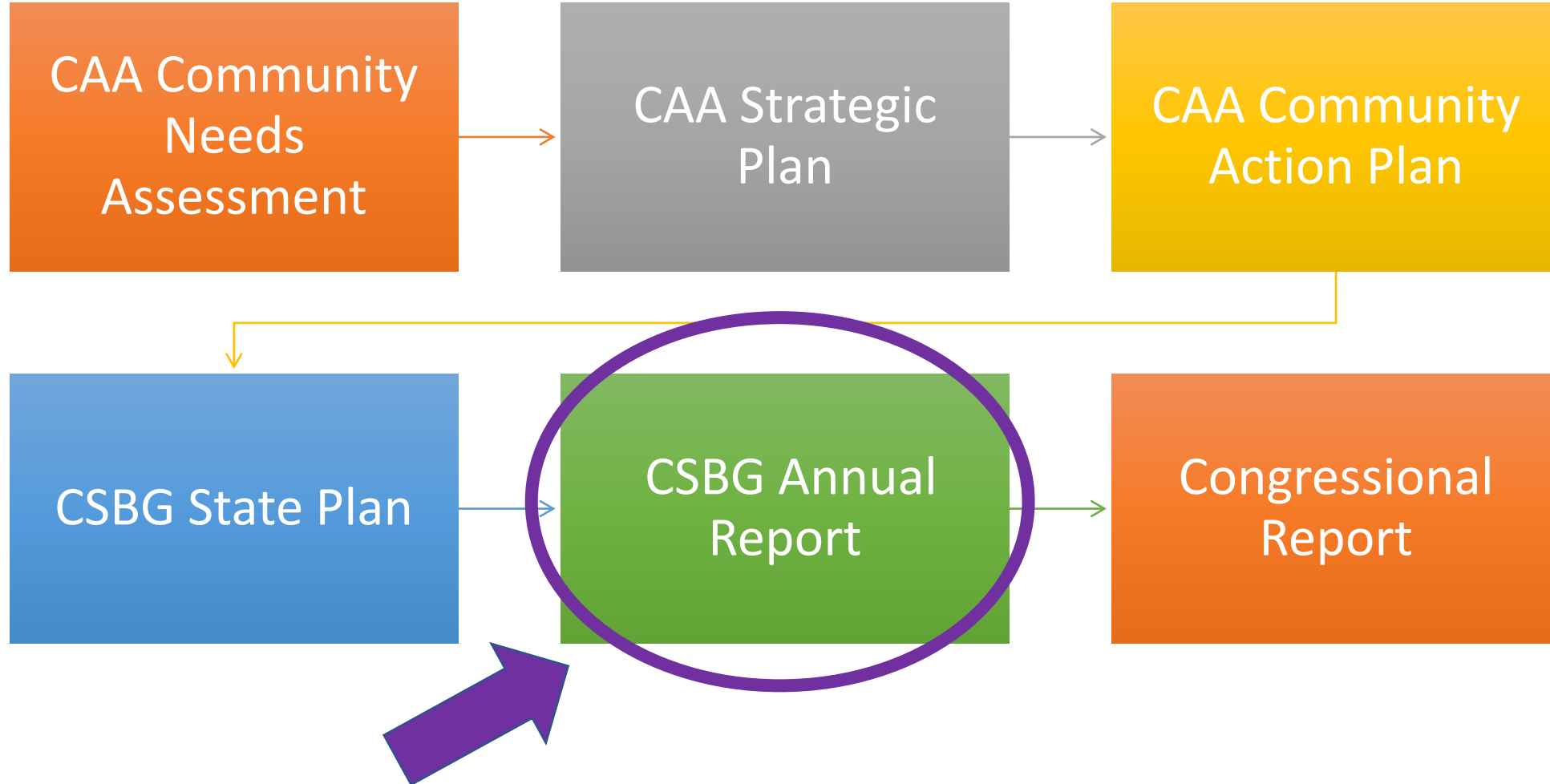


Provides information on State progress with organizational standards and state accountability measures



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

HOW DOES THIS ALL FIT TOGETHER?



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

What Data is in my Annual Report?

Module 1:

- Section A: CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact
- Section B: Statewide Goals and Accomplishments
- Section C: Eligible Entity Updates
- Section D: Standards for CSBG Eligible Entities
- Section E: State Use of Funds
- Section F: State Training and Technical Assistance
- Section G: State Linkages and Communication
- Section H: Monitoring, Corrective Action, and Fiscal Controls
- Section I: Results Oriented Management and Accountability (ROMA) System

Module 1: Things to Note

- Updated report for FY20
 - Biggest change is in how CSBG dollars are reported. States will now report expenditures in addition to allocation and obligations.
 - Minor or no changes otherwise.
- Hand-entered into OLDC while Module 2-4 is an uploaded XML
- Consider how you obtain information from the CAAs to respond to specific narrative questions
- Reporting on Single Audit reviews
 - Need to consider your internal process

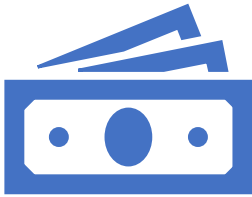


Reporting Periods

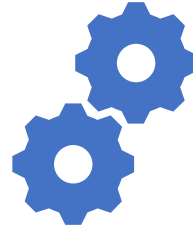
- All data in Module 1 is reported on the FFY (October – September)
- In your state, Module 2-4 may be reported on a different reporting period
 - ☐ Calendar year
 - ☐ State fiscal year
 - ☐ Federal fiscal year



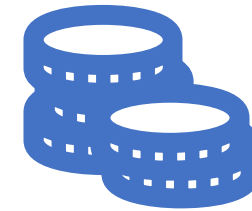
Module 2: Agency Expenditures, Capacity, and Resources



Funds spent by eligible entities on the direct delivery of local services and strategies



Capacity development



Information on funding devoted to administrative costs by the eligible entities


RAW DATA COLLECTION: General Ledgers, Expenditure Tracking, Program Tracking, Certification Tracking, Community Partner List

Module 3: Community Level

- Implementation for community-level strategies (Community Level indicators for each domain)
 - Baseline
 - Target
 - Actual Results
- Results achieved for community-level strategies

RAW DATA COLLECTION: Community Initiative Tracking





Module 4: Individual and Family Level

- Each Domain's indicators contain data elements by:
 - Targets
 - Results
 - Percent Achieving Outcomes
 - Performance Target Accuracy
- Services provided to individuals and families
- Demographic characteristics of people served by eligible entities

RAW DATA COLLECTION: People and Households served Tracking System

INDIVIDUAL AND FAMILY LEVEL



Indicators provide a means to measure achievement of or movement towards the long term goals.



Document the number of people who receive services, the number who achieved outcomes, and their demographic data.

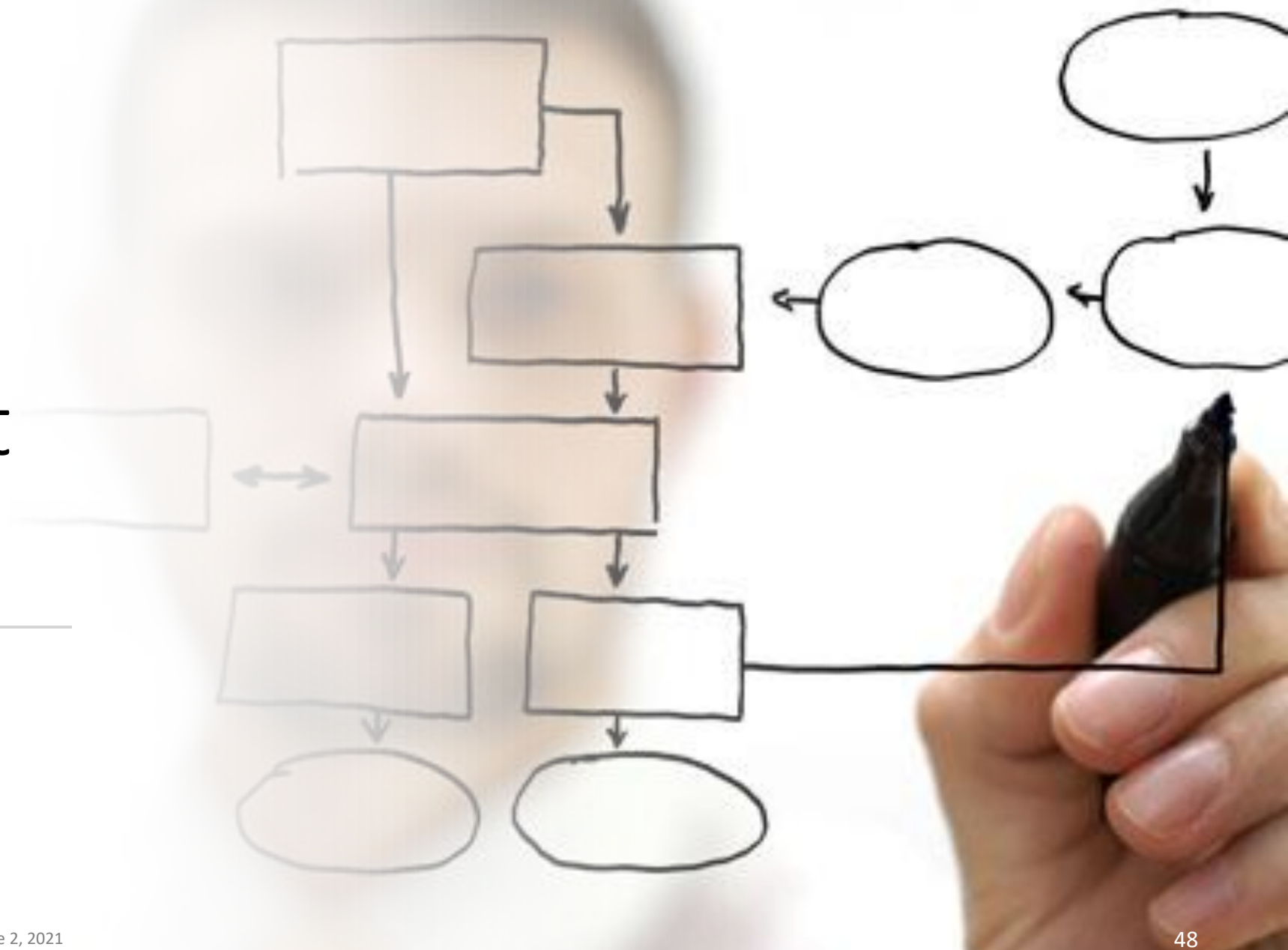


Provide data for analysis:

- What change was expected?
- What change happened?
- How does the actual change compare with the expected change?
- How accurate were the projections
- What percent of people served achieved the outcome?



Annual Report Process



Explanation of process



- Agencies collect data on the services/ outcomes etc.
- Agencies can input data into the SmartForms
- SmartForms have logic to help agencies see common data flags, errors, warnings.
- States should review SmartForms for those warnings, review for completeness and accuracy and ask CAAs questions where necessary on their data.
- Also use the Module 2, 3, and 4 review checklists for data considerations.
- States submit the Annual Report in OLDC

Process Considerations



Quarterly or semiannual submission of reports can help you quality check data throughout the year



Agencies need time to fully compile, review, and ensure quality of their data before reporting (leave enough time for agencies to do this process!)



The state needs time to review the data and get clarifications from the agencies prior to submitting in OLDC

How am I supposed to review this data?

- Module by Module for completeness and accuracy
- Use the color coding and errors and warnings in the SmartForms
- Use NASCSP's checklists
- Go beyond what the SmartForm tells you
 - Compare services to outcomes
 - Outcomes and services to demographics
 - Reported demographics to Census data
 - Total number of people who live in poverty to who was served
 - Total number of people who live in the service area to who was served

NASCSP Data Review Webinars and Tools

<https://nascsp.org/annual-report-webinars/>

****New** CSBG Annual Report Data Review Webinar (02/17/2021)- [Recording](#) | [Slides](#)**

- [CSBG Reporting Workgroup Common/ "Other" Indicator Recommendations](#)
- [Sample Cleaning Memo Email](#)
- [Mock Example Module 2 Explanations](#)
- [Mock Example Module 4 Explanations](#)

Webinar on FY19 SmartForms (5/26/2020) – [Slides](#) | [Recording](#)

CSBG Annual Report Q & A – On March 13, 2019 NASCSP and OCS presented a webinar on the Annual Report. Want to know where to report CSBG expenditures? Or how to complete the All Characteristics Report? Or what a community level initiative is? check out this webinar to learn about common CSBG Annual Report questions and get more of yours answered! [Slides](#) | [Recording](#)

OLDC Webinar – On February 28, 2019, OCS held a webinar on submitting Module 1 and uploading SmartForms for Modules 2-4 in OLDC. [Slides](#) | [Recording](#)

NASCSP and OCS Webinar: CSBG SmartForms for Annual Report Modules 2-4 – On February 27, 2019, NASCSP and OCS hosted a webinar to review the new CSBG SmartForms for Modules 2, 3, and 4 of the Annual Report. NASCSP and OCS will demonstrate using the SmartForms, highlight functionality of the forms, and discuss reporting. [Slides](#) | [Recording](#)

CSBG Annual Report: Where We're At and Where We're Headed – On November 5, 2018, NASCSP and OCS touch base about the Annual report and discuss the road ahead before the April 30, 2019 reporting deadline. Participants will receive answers to some of the most Frequently Asked Questions about the report and learn about the resources available to assist you in reporting. The intended audience of this webinar is anyone involved in reporting or in leadership at the State, State Association, or Local Agency level. [Slides](#) | [Recording](#)

State Role- Submission

- Once data is reviewed, completed, accurate, the state will submit in OLDC
 - SmartForms will need to be converted to XML documents for upload.
 - The comments template will be an attachment to Module 2 and 4
 - States will need to validate the report in OLDC to ensure submission

All tools and resources for the SmartForm process and the OLDC process can be found here:

<https://nascsp.org/csbg/csbg-data-collection-and-reporting/csbg-annual-report/>

Upload XMLs from SmartForms for Modules 2 and 4 to OLDC



XML Export

Double click in any row to go to the cell that generated the error or warning.

Module 2 Errors and Warnings			
Tab	Data Field	Severity	Message Description
Section A. Local CSBG Expen	A.2b. CSBG Expenditures Domains - Education and Cognitive Development	Warning	The value entered for the current year is greater than \$0.00, while last year, the value reported here was \$0.00.
Section A. Local CSBG Expen	A.2i. CSBG Expenditures Domains - Agency Capacity Building	Warning	The value entered for the current year is greater than \$0.00, while last year, the value reported here was \$0.00.
Section A. Local CSBG Expen	A.3. CSBG Expenditures Domains - Administration	Warning	The value entered for the current year is \$0.00, while last year, the value reported here was greater than \$0.00.
Section A. Local CSBG Expen	A.1 CSBG Eligible Entry Reporting Period	ERROR	Select only one CSBG Eligible Entry Reporting Period
Section A. Local CSBG Expen	A.4 - Details on Agency Capacity Building Funded by CSBG	ERROR	You must select at least one checkbox since you reported funds in A.2i.
Section B. Local Agency Capacit	B.2a. Hours of Agency Capacity Building - Board Members	Warning	The value entered for the current year is 0.00, while last year, the value reported here was greater than 0.00.
Section B. Local Agency Capacit	B.2b. Hours of Agency Capacity Building - Agency Staff	Warning	The value entered for the current year is 0.00, while last year, the value reported here was greater than 0.00.
Section B. Local Agency Capacit	B.3a. Volunteer Hours of Agency Capacity Building - Total Hours	Warning	The value entered for the current year is 0.00, while last year, the value reported here was greater than 0.00.
Section B. Local Agency Capacit	B.3a.1. Volunteer Hours of Agency Capacity Building - Low-Income Hours	Warning	The value entered for the current year is 0.00, while last year, the value reported here was greater than 0.00.
Section B. Local Agency Capacit	B.4c. Staff with Certifications - CCAP	Warning	The value entered for the current year is 0, while last year, the value reported here was greater than 0.
Section B. Local Agency Capacit	B.4e. Staff with Certifications - Family Development	Warning	The value entered for the current year is 0, while last year, the value reported here was greater than 0.
Section B. Local Agency Capacit	B.4g. Number of Staff with Home Energy Professional Certifications	Warning	The value entered for the current year is 0, while last year, the value reported here was greater than 0.
Section B. Local Agency Capacit	B.4a.1. Number of Energy Auditors	Warning	The value entered for the current year is 0, while last year, the value reported

Instructions

Outstanding Errors and Warnings

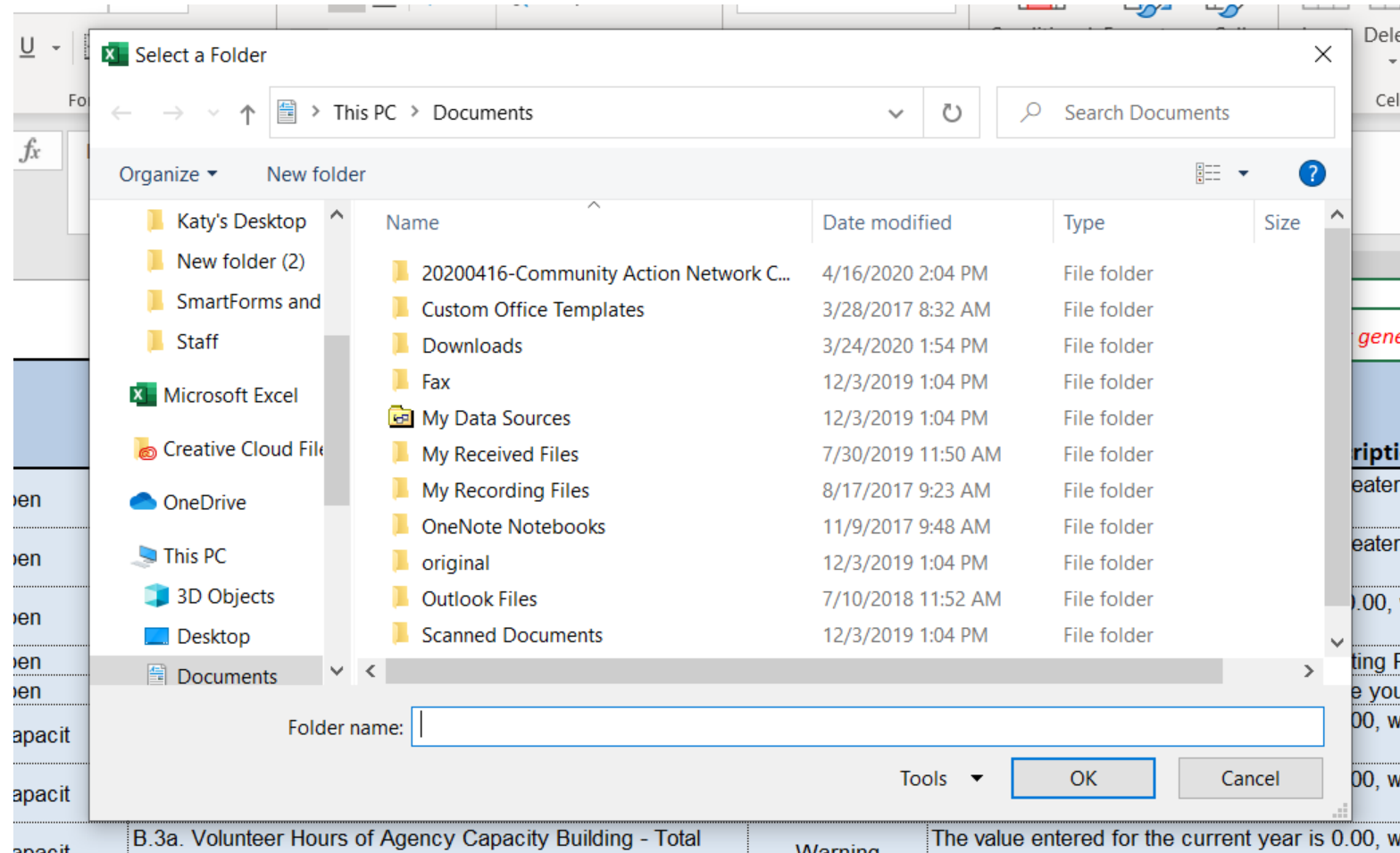
Section A. Local CSBG Expen

Section B. Local Agency Capacit

Section C. Local CSBG Resources

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Export to XML and Save Files for Upload





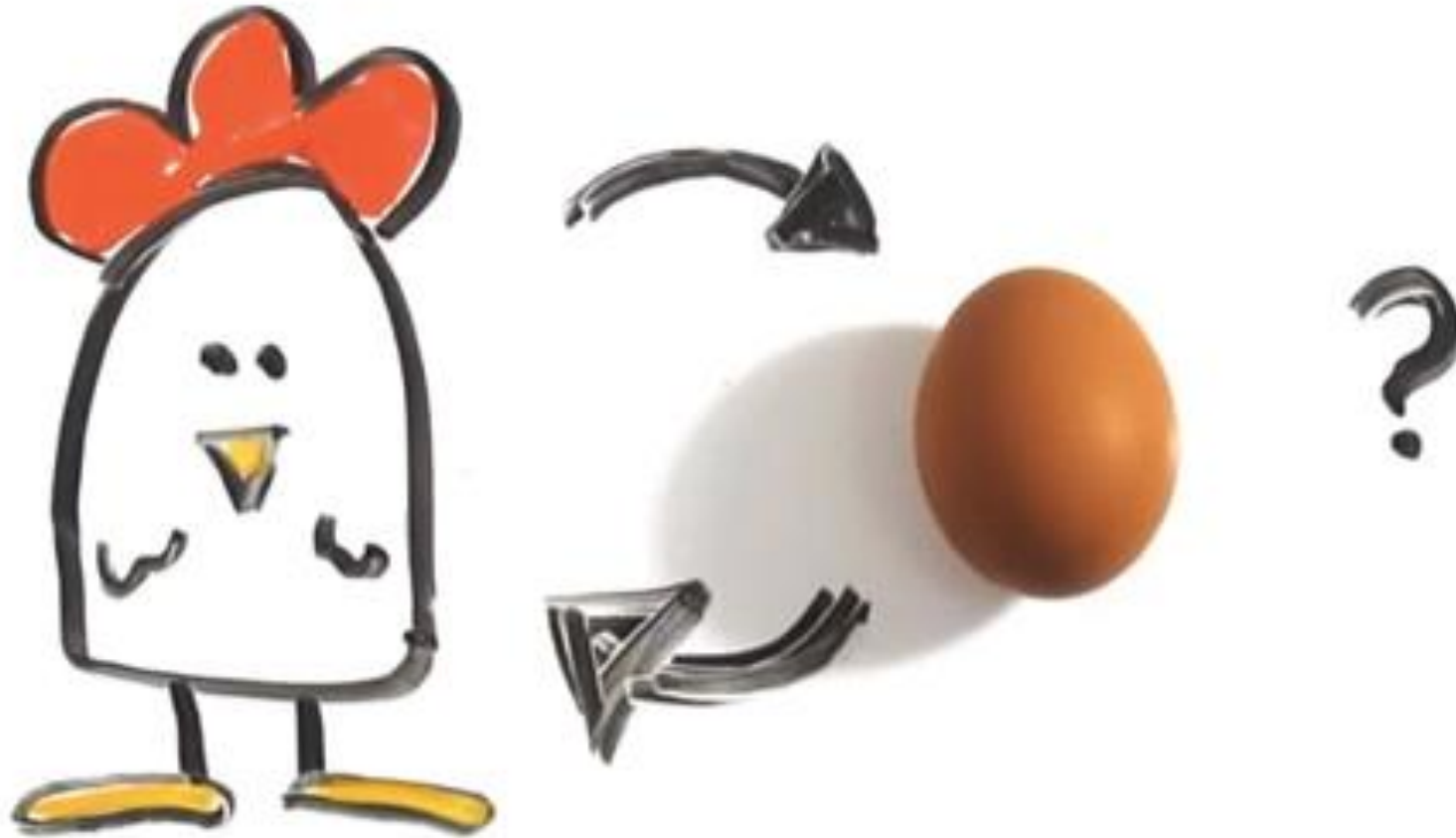
Beyond Submission

- Data Review by OCS & NASCSP
 - May ask for clarifications on data; may require the state to go back to agencies.
- Finalized data is used to produce the Report to Congress, national fact sheets, and state fact sheets
 - These tools can help you to tell the CSBG story in your state

Discussion

- How is Annual Reporting going in your state?
 - What is going well?
 - What is something you may change for next time?





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Training and Technical Assistance

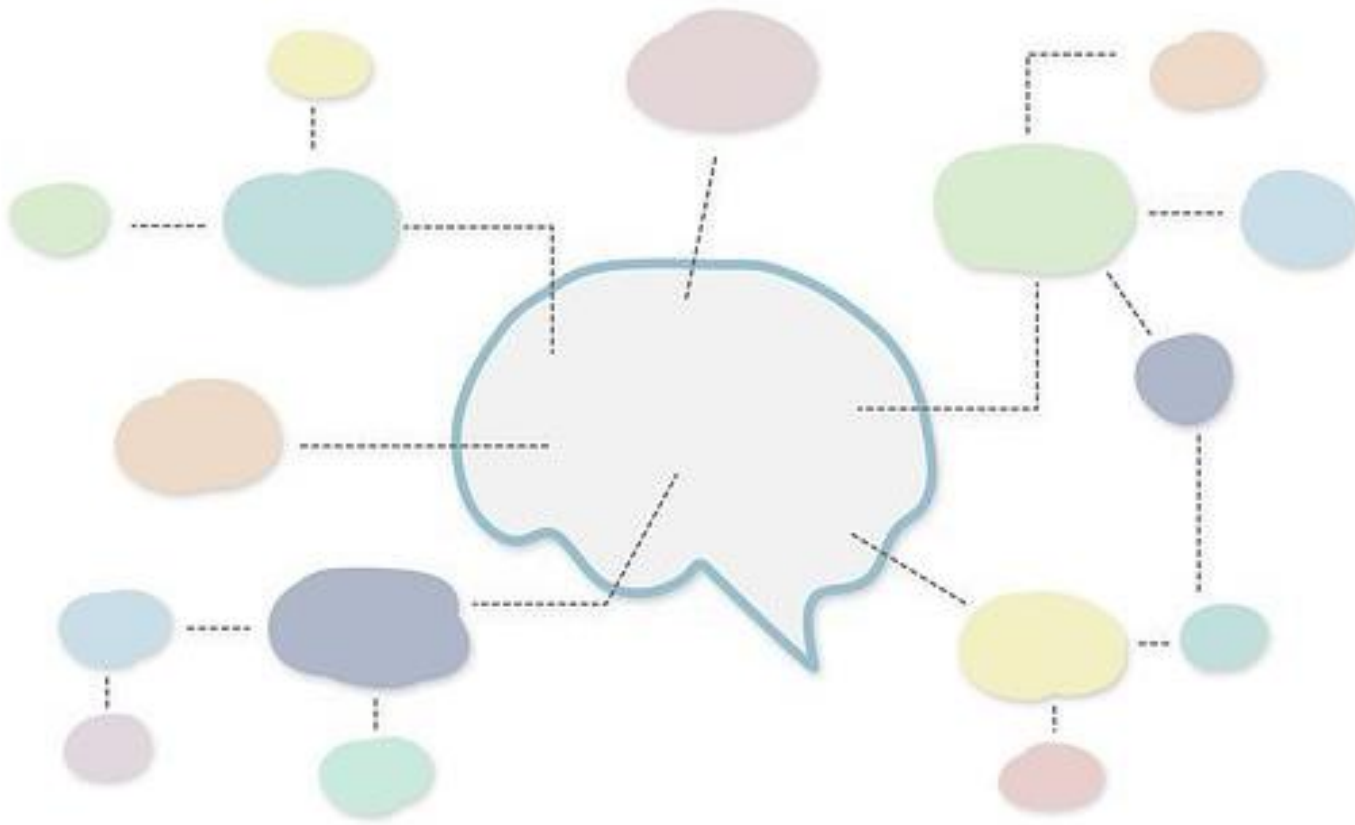
TRAINING AND TECHNICAL ASSISTANCE

- Assessing Network Needs
 - Monitoring Deficiencies
 - Organizational Standards Issues
 - Annual Report Analysis
 - Conversations!
- Planning:
 - State TTA Plan
 - TTA Schedule
 - RPIC
 - RPIC TTA Plan
- Implementing and Offering TTA



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Knowledge Check!



You notice that agencies are not meeting targets submitted with their CAP Plans for the NPIs. What should you do? (Select All that Apply)

- A.) Issue a monitoring finding
- B.) Provide T/TA
- C.) Talk with the agencies
- D.) Talk to the Association

Wrap Up & Homework

- Reflection:
 - What's something that you learned today?
 - What's an action step you will take as a result of something you heard?
- Homework:
 - Complete these sections of your State Office Action Plan:
 - Funding
 - Monitoring
 - Reporting

