



COLORADO

Department of Local Affairs

COMMUNITY SERVICES BLOCK GRANT (CSBG) PROGRAM IMPLEMENTATION MANUAL for RECIPIENTS

(County or Organization staff that manage CSBG grant funds)

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Online: <https://www.colorado.gov/pacific/dola/community-services-block-grant-csbg>

Introduction

This manual is a Community Services Block Grant (CSBG) program implementation guide developed by the Department of Local Affairs (DOLA), Division of Local Government (DLG) to assist Colorado CSBG recipients in the administration of federal CSBG funds.

The manual has three distinct purposes:

1. To give an overview of the CSBG program and its administration by CSBG Eligible Entities/CSBG recipients.
2. To provide guidance to CSBG program administrators to assist in developing policies and procedures appropriate to their specific programs.
3. To provide guidance on the three elements that govern program oversight by the Department of Local Affairs (DOLA or department): CSBG statute, contract with DOLA and federal organizational standards applied to the program.

CSBG Program Oversight Guiding Principles

In keeping with Colorado's model of local control, DOLA works within the framework of federal program requirements from the U.S. Department of Health and Human Services to support recipients in implementing the CSBG program at the local level. Local program implementation should be in alignment with all applicable local policies and procedures, community needs, leadership and governance structure. DOLA recognizes that CSBG program implementation will vary across organizations due to differences in geography, areas served, community needs, capacity and local processes.

DOLA expects, however, that CSBG Eligible Entities will utilize this document to develop and implement written program policies and procedures to ensure effective administration of the CSBG program locally. Recipients with sub-recipients (subcontractors and/or subrecipients) must also oversee their recipient agencies' compliance with the policies and procedures listed in this document. CSBG staff is available to provide informal guidance, sample documents and training and technical assistance as needed.

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SECTION 1: Grant Distribution Policies and Procedures (Includes Organizational Standards 1-3 of 9.)

Each CSBG eligible entity must provide to DOLA a current, dated copy of local CSBG program policies and procedures upon request, which includes the date accepted and minutes from the tripartite board meeting at which the policies and procedures were approved. Recipients will be monitored to ensure they are fulfilling their own local policies and procedures.

Program policies and procedures must include:

1. Documentation Policies
2. Performance Reporting
3. Nondiscrimination policies
4. Grievance Policies
5. Policies to Ensure Maximum Public Participation

Documentation Policies

Documents Related to Program Administration

The following documents must be made available for public inspection at the recipient's central office at a reasonable time.

- Approved CSBG applications as submitted to DOLA.
- Articles of Incorporation, bylaws and board membership list.
- All contracts (including funding, consulting, goods and services and delegate contracts) pertaining to CSBG funds.
- All final reports (including audits) made to DOLA on projects funded with CSBG funds.
- Minutes of the meetings of the tripartite board.
- Position titles, salary ranges and job descriptions for all compensated positions.
- All other information required by DOLA to be maintained by the recipient not otherwise exempt under Colorado Open Records Act (CORA).

If a CORA requestor wishes copies of a document, the recipient may request a reasonable fee not to exceed .25 cents per page, and/or \$20.00 per hour with the first hour of work being free. CORA recognizes that certain records contain private or privileged information. Content identified by the Act as exempt need not be disclosed.

Client Intake

CSBG eligible entities are expected to maintain files on clients served by the CSBG program for DOLA to confirm client eligibility and review use of funds in monitoring visits or upon request. Files are only required for clients who receive support through CSBG funds.

However, programs may also make local decisions about whether to track applicants who are declined, what need they applied for and reason for denial (did not income qualify, lack of grant funds available, etc.) to use as part of community needs assessment and/or program evaluation.

Client intake documents must solicit the following information:

- Date of application for support.
- Applicant name and address.

- Applicant gender, date of birth, disability status, health insurance status, education level (for household members whose age is equal to or greater than 24), family size, income and income types (source) for all household earners.
- Applicant signature.
- Income certification documents.
- Name and title of the person performing the intake.

A record of service provision must be included in the applicant/participant files of each eligible applicant/participant. The record must include the initial date of service and the services provided, as well as the date and services provided for on-going or repeated services. Records of service provision may be maintained electronically, as long as the agency is able to maintain separate records on each program participant. Client assessments are encouraged to be incorporated into the record of service provision.

Client Income Eligibility Verification

Client files must contain copies of documents used to certify income. If such documentation is not included, the file must contain a statement detailing the documents reviewed and how the household income was calculated. In the case of applicants reporting zero income, the file must contain a written explanation why there is no income. A staff member must sign off on the income evaluation.

In determining household income, self-declaration of income must be used only as a method of last resort. If this method is used, notation must be on-file stating the reason(s) why other verification methods could not be used. The signature of the applicant must appear on the self-declaration statement. A staff member must sign off on the self-declaration.

Typically, one-time services, which are provided to people who are likely to meet the CSBG income eligibility requirements, do not require validation of income when circumstances make it impossible or impracticable to obtain income documentation. Examples include homeless shelters and food banks; *or* services to children receiving SNAP benefits; and/or services that facilitate linkages and coordination of services to low-income people in the community. Ongoing services such as case management, employment training or educational/health classes typically require income validation.

CSBG program eligibility is limited to individuals who earn an annual household income at or below 125% Federal Poverty Level, which is released by the U.S. Department of Health and Human Services annually as published in the Federal Register. The guidelines are calculated on a sliding scale based on the number of persons in a client's family. To calculate 125% of the federal poverty line, use the amount stated in the poverty guidelines relating to the number of persons in the client's household and multiply that number by 1.25. When case management activities and other non-direct financial aid are funded by multiple funding streams, a pro rata share of cases qualifying at the 125% level must be equivalent to, or greater than, the percent of CSBG funding supporting the activities.

The most current Federal Poverty Guideline published annually by the US Department of Health and Human Services in the Federal Register, typically in January, is the sole method of establishing financial eligibility. The Federal Register is the only acceptable source of Federal Poverty Level.

Household Size

Recipients may determine how they define a household for the purpose of administering the local CSBG program and evaluating eligibility. In general, DOLA defines household as an individual or group of individuals who are living together in a dwelling unit as one economic unit. Children receiving foster care services are allowed to represent a household of one for the purpose of eligibility determination.

Household Income

CSBG staff must verify income as established within the program policies and procedures by recipients.

- **In general, household income includes** gross (pre-tax) income from employment, net income if self-employed, public assistance cash benefits, alimony, child support, net rental income, gaming or lottery winnings, SSI, interest, and taxable income. It is calculated without consideration of taxes paid or anticipated.
- **Household income does not include** capital gains; any assets drawn down as withdrawals from a bank, the sale of property, a house or a car, or tax refunds, gifts, loans, lump sum inheritances, one-time insurance payments, or compensation for injury. Also excluded are noncash benefits, such as the employer-paid or union-paid portion of health insurance or other employee fringe benefits; food or housing received in lieu of wages; the value of food and fuel produced and consumed on farms; the imputed value of rent from owner-occupied non-farm or farm housing; and such Federal **non-cash benefit** programs as Medicare, Medicaid, food stamps, school lunches, and housing assistance, and certain disability payments made to disabled children of Vietnam veterans as prescribed by the Secretary of Veterans Affairs.

Requirements for Proof of Immigration Status

The Office of Community Services provided guidance in Informational Memorandum #30 that CSBG is not public benefit program and does not require an affidavit of legal residency or the verification requirements published in the Federal Register on August 4, 1998 (63 FR 41662) in order to provide services to individuals. IM #30 also specifies that “non citizens, regardless of their [immigration] status should not be banned from Community Services Block Grant programs based solely on their [immigration] status unless such exclusion is already authorized by another statute.”

Client Eligibility Recertification

All requirements applicable to eligibility certification, including income verification, apply to recertification. The criteria established by the recipient for income verification should be used for income recertification. Other pertinent information, such as household size, and address, should be updated as applicable.

The time period for which an applicant/participant is eligible for CSBG funded services and direct financial aid must be defined in the recipient’s written procedures and be uniformly applied. In lieu of a published definition of “eligibility period”, the eligible period is the same length as the period used for income verification, which is 12 months from the date of verification.

Appeal Procedures

CSBG programs must notify applicants whose applications are determined to be ineligible. Notification must include reason(s) for ineligibility. For those activities and services for which eligible applicants exceed capacity, the recipient must provide and follow a documented process for prioritizing applicants and for notifying applicants of their status.

Recipients must offer an appeal procedure which includes the process through which applicants for service are made aware of their right to appeal a decision related to their determination of eligibility.

Services to Ineligible Applicants

CSBG funded services provided for applicants who are determined to be ineligible because their household income exceeds 125% of Federal Poverty Level are restricted to information, referral and linkages.

Coordination of Services

CSBG eligible entities must assure coordination between anti-poverty programs in their community and emergency energy crisis intervention programs. DOLA requires the following:

- CSBG programs with relevant programs must maintain regular communication with area offices that distribute LIHEAP and WIOA funds.
- CSBG programs must make reasonable efforts to establish procedures for sharing information on recipients of energy assistance services with local LIHEAP programs so that a duplication of services can be avoided.
- CSBG programs must make reasonable efforts to establish procedures for sharing information on recipients of employment services with local WIOA programs so that a duplication of services can be avoided.
- CSBG programs must identify and inform custodial parents in single-parent families that participate in CSBG programs about the availability of child support services, and refer eligible parents to the child support offices of State and local governments

DOLA staff may review efforts to coordinate services by working with State program administrators and through its monitoring of recipients.

Community Action Plan (CAP)

Recipients must have a community action plan (CAP) approved by its board/committee prior to submission to DOLA.

The CAP must:

- Be prepared to respond to the findings contained with the community needs assessment.
- Clearly define the duration covered by the plan.
- Contain a mission statement succinctly defining the reason the program or organization exists
- Identify goals and/or strategic innovation initiatives: six to seven goals/initiatives may be adequate and must align with meeting the three national goals.
 - Goals are those overarching and broad statements of what the organization or program hopes to achieve
 - Strategic innovation initiatives are change-focused activities that demand attention and cannot be left to the business-as-usual cycle.
 - A CAP may include one or both of these elements

- Identify strategies: strategies are statements of major approaches that will be used to achieve the goal. Three to five strategies for each goal may be adequate.
- Contain a process for evaluating elements within the plan, summarized in a Results Oriented Management and Accountability (ROMA) Logic Model.

Results Oriented Management and Accountability (ROMA)

All CSBG grant administrators must complete at least 8 hours of ROMA training in order to effectively manage the program. This requirement extends to all CSBG recipient agencies, including both recipients and their sub-recipients.

Performance Reporting Requirements

Performance reports consist of semiannual reports on program achievements and a year-end report known as the Final or Information Systems (IS) Survey or Report. Each recipient of CSBG funds must submit reports, on forms provided by DOLA, on activities supported by CSBG grant funds. Where CSBG funds are used to support the primary agency infrastructure, CSBG is considered to impact all programs and services provided by the agency. Recipients are, therefore, guided to provide information reflective of the total agency impact on the causes and effects of poverty.

Semiannual program reports are due July 31 and January 31 for the prior 6-month period. The CSBG Final IS Report is typically due on February 28. Recipients must maintain documentation that can validate the information submitted in the program reports and Final IS Report submission.

Organizational Standards Section 1: MAXIMUM FEASIBLE PARTICIPATION

Category 1: Consumer Input & Involvement

Maximum feasible participation is a key aspect of CSBG, which is rooted in the belief that low-income people are in the best position to express what they need to make a difference in their lives. CSBG programs are required to demonstrate the participation of low-income people in its activities, not just as recipients, but as partners in program development. Consumer input efforts must encompass elements listed in the CSBG organizational standards, Category 1. These standards apply to both private (organization) and public (department) recipients. Category 1 standards are:

- 1.1 The organization/department demonstrates low-income individuals' participation in its activities.
- 1.2 The organization/department analyzes information collected directly from low-income individuals as part of the community assessment.
- 1.3 The organization has a systematic approach for collecting, analyzing and reporting customer satisfaction to the governing board/advisory committee. For public recipients, this may be met through broader local government processes.

Category 2: Community Engagement

Effectively partnering with public, private, and nonprofit recipients in a community ensures that services are unduplicated and creates a system of services available to low-income residents of the community. Partnerships may be accomplished through board representation

as well as formal and informal partnerships. Community engagement efforts must encompass elements listed in the CSBG organizational standards, Category 2. These standards apply to both private (organization) and public (department) recipients. Category 2 standards are:

- 2.1 The organization/department has documented or demonstrated partnerships across the community, for specifically identified purposes; partnerships include other anti-poverty organizations in the area.
- 2.2 The organization/department utilizes information gathered from key sectors of the community in assessing needs and resources, during the community assessment process or at other times. These sectors would include at minimum: community-based organizations, faith-based organizations, private sector, public sector and educational institutions.
- 2.3 The organization/department communicates its activities and results to the community.
- 2.4 The organization/department documents the number of volunteers and hours mobilized in support of its activities.

Category 3: Community Assessment

As required by the Coats Human Services Reauthorization Act of 1998, which updated the statutory requirements for CSBG, and as a condition of funding, recipients must submit a community needs assessment with their CSBG application. Community needs assessments align with Colorado CSBG core values in local control and create a pathway for the uniqueness of program design at the local level, based on specific community needs. A community needs assessment must contain all elements listed in the CSBG organizational standards, Category 3. These standards apply to both private (organization) and public (department) recipients. Category 3 standards are:

- 3.1 The organization/department conducted a community assessment and issued a report within the past 3 years.
- 3.2 As part of the community assessment, the organization/department collects and includes current data specific to poverty and its prevalence related to gender, age, and race/ethnicity for their service area(s).
- 3.3 The organization/department collects and analyzes both qualitative and quantitative data on its geographic service area(s) in the community assessment.
- 3.4 The community assessment includes key findings on the causes and conditions of poverty and the needs of the communities assesses.
- 3.5 The board/committee formally accepts the completed community assessment.

A full community assessment must be completed, at a minimum, once every three (3) years; updates detailing significant variances may be provided in intervening years. Legislation allows that the assessment may be coordinated with community assessments conducted for other programs.

SECTION 2: GOVERNANCE **(Includes Organizational Standards 4-6 of 9.)**

Tripartite Board Requirements

Per Section 676B of the CSBG Reauthorization Act, CSBG recipients are required to have governing boards (or in the case of a public recipient, an advisory committee). By statute, board of directors/advisory committees of CSBG recipients must fully participate in the development, planning, implementation and evaluation of programs and operations supported by CSBG funds.

To fulfill this requirement, the board/committee must be aware of CSBG's role within the agency or organization and must receive all pertinent information related to CSBG grant operations, monitoring and reporting. The board/committee, as applicable, must be immediately informed of any sanctions or disciplinary action that DOLA takes against the recipient.

Recipients will provide DOLA with a current, dated copy of local CSBG board bylaws, policies and procedures upon request. Recipients will be monitored to ensure they are fulfilling their own local policies and procedures.

Advisory Boards/Committees as the Tripartite Board

In those communities where a political subdivision such as a county has been designated as the recipient, the governing officials are required to establish an advisory board or committee for the CSBG program. The advisory board/committee is constituted in the same manner as a governing board. Unlike the governing board, the advisory board/committee is not the source of all authority in the agency, nor is it the legal embodiment of the agency. The board's actual authority depends on the powers delegated to it by the governing officials of the political jurisdiction.

Advisory boards/committees must also demonstrate that members actively participate in the development, planning, implementation and evaluation of the community action plan. In some cases, the advisory board/committee may also oversee other programs for the County.

Board Composition

To receive or continue to receive CSBG funds, eligible entities must comply with certain requirements pertaining to board composition and operation. Tripartite boards/advisory committees must have a minimum of three members chosen in compliance with the following:

- 1. One-third of the members are comprised of elected/public officials**, holding office on the date of selection, or their representatives. If the number of elected officials reasonably available and willing to serve on the board is less than one-third of the membership, another appointed public official or their representative may be counted in meeting such one-third requirement.

Both the elected and the appointed public officials selected to serve on the board must have either executive government responsibilities, or responsibilities which require them to be involved with poverty-related matters. Each public official may choose one representative to serve on the board, full-time on his or her behalf. This member need

not be a public official himself or herself, but he or she assumes the elected (or appointed) official's seat on the board.

Recipients that plan to seat an appointed public official or their representative, rather than an elected public official or their representative, must demonstrate reasonable attempts to seat an elect official and document the reason that an elected official is not available to serve.

2. **No less than 1/3 of the members are representative of low-income individuals and families in the neighborhood/community served by the member.** Representatives of low-income persons must be chosen in accordance with democratic selection procedures adequate to assure that they represent the low-income person in the geographic area served by the recipient.

Recipients must retain records documenting the democratic selection of low-income representatives seated on the board/committee. Among the selection procedures which may be used, either separately or in combination, are the following:

- Publication of the tripartite board/advisory committee vacancy in places that reach low-income community members such as program materials, agency lobbies, flyers distributed by case managers or other public venues.
- Nominations and elections within the neighborhood, agency or community as a whole.
- Selection at a meeting or conference of low-income persons, when the date, time and place of the meeting or conference have been adequately publicized to ensure access.
- The process for selection of low-income community members must be consistent with local Boards and Commissions processes including announcement of vacancy, application, interview, recommendation and selection of board members.

3. **The remaining 1/3 of the members are representatives of business, industry, labor, law enforcement, religious groups, welfare, education and other groups or interests in the community.** These members are referred to as private sector representatives.

Each member of the board selected to represent a specific geographic area within the community must live or work within the area he or she represents. No person may serve on the recipient's board that is an employee of the recipient or an employee of the recipient's CSBG sub-recipients unless written conflict of interest procedures exist that require board members to absolve themselves from voting on decisions concerning their respective agency.

To ensure an independent body, board members may not be related to one another or to the executive director. The following individuals meet the definition of "related": domestic partner and biological, adoptive, foster or step-father, mother, brother, sister, aunt, uncle, first cousin, son, daughter, mother-in-law, father-in-law, brother-in-law, sister-in-law and grandparent.

Prospective board members should be informed of the recipient's expectations of their board and its members prior to their election or appointment to the board. New board members should receive an orientation and/or materials that include at minimum a program overview, schedule of meetings, Board bylaws, policies and procedures, current

financial statements, community needs assessment, strategic plan, and community action plan.

The appointment of advisory board members for public recipients must be consistent with local Boards and Commissions processes including announcement of vacancy, application, interview, recommendation and selection of members.

The appointment of tri-partite board members for private recipients must be consistent with board bylaws including announcement of vacancy, application, interview, recommendation and selection of members.

Board/Committee Bylaws Requirements

Recipients will ensure that DOLA is provided a current, dated copy of approved bylaws upon request. Recipients will be monitored to ensure they are fulfilling their own local bylaws. The board/committee will develop and approve bylaws by which the board will operate. Bylaws must include:

- Total number of seats on the board and the allotment of seats to public officials, representatives of low-income individuals and private sector representatives.
- Defined terms not to exceed three (3) years for each member position. Term limits, if desired, may be expressed as multiple of terms.
- The quorum for a meeting of the tripartite board must be at least fifty (50) percent of the non-vacant seats on the board. At least one low-income representative must be present for all CSBG related decisions requiring a vote.
- Procedures for the recruitment and selection of board members. Procedures for the selection of representative of low-income persons must ensure that all areas of the low-income community will be represented.
- Requirement that the board elect (vote to seat) all members, no matter the selection method used to identify prospective members. Procedures limit votes to one per person.
- Performance standards (such as attendance) and standards of conduct for members of the board, the violation of which may be grounds for removal.
- Specific procedures to be followed for the removal of board members.
- Procedures for selecting new board members in the case of a vacancy on the board.

Procedures must be established within bylaws under which a low-income individual, community organization or religious organization or representatives of low-income individuals that considers its organization or low-income individuals to be inadequately represented on the board of the recipient, may petition for adequate representation.

Board Code of Ethics

Recipients must develop written policies which observe Colorado state Code of Ethics as set forth at 24-18-101, C.R.S., et. Seq. concerning public employees and the following minimum standards governing the conduct of board members, employees and their immediate families.

Board members, employees and members of their immediate families may not solicit or accept gifts, gratuities, or favors of a monetary value which exceeds forty dollars (\$40) and courtesy meals which exceed twenty-five dollars (\$25), in accordance with the Colorado ethics laws, from:

- Any contractor, potential contractor or subcontractor of the recipient.
- Any person applying for or receiving benefits or services through or from the recipient.

- Any person in a position to benefit otherwise from the activities of the recipient.

Any board member, employee or member of his or her family having a financial interest in a contract with the recipient which is supported by CSBG funds must make complete disclosure of such interest to a responsible and objective recipient official.

A board member or employee of a recipient will refrain from all participation in any matter involving CSBG funds which affect, to his or her knowledge, the financial interest of:

- His or her business partner(s) or a business organization with which he or she is associated.
- Any person or organization with whom he or she is negotiating or has any arrangement concerning prospective employment.

All members of the tripartite board must disclose any conflict of interest to the tripartite board staff representative and must not vote on any matter or make any recommendations or influence the decisions of other members when a conflict of interest exists as set forth in the Code of Ethics. Members and employees of recipients must refrain from conduct which violates any of the above standards or gives the appearance of violating the standards.

Filling Board Vacancies

A vacancy occurs on the tripartite board/advisory committee when a term has expired, a member has been notified of their official removal by the board, a member submits their resignation, a member dies, a member who is an elected public official leaves office, or a member who is an appointed public official is removed from office, or a member is the representative of a public official and the public official leaves office. Recipients will notify DOLA in their next Semiannual Program Report and will actively work to fill the position within 90 days. If the position cannot be filled within 90 days, the recipient will submit to DOLA an explanation and action plan for filling the vacancy with their Semiannual Program Report. Tripartite Board/Advisory Committee vacancies must be filled within 18 months. If the vacancy is not filled within 18 months the recipient will be considered out of compliance with the CSBG Act requirements and a Technical Assistance Plan will need to be put in place.

When the seat of a representative of a public official becomes vacant, the board must request that the public official, or appointing authority, name a replacement.

When the seat of a representative of low-income persons becomes vacant, the bylaws must include one of two methods for filling a vacancy: The selection procedure may be repeated or alternately, the remaining low-income representatives may select a replacement to serve for the remainder of the term. In the latter case, the person selected will, to the maximum extent possible, represent the same constituency as the original representative.

When the seat of a representative of the private sector becomes vacant, the board may consider its skill set requirements and recruit accordingly. A board development committee, or equivalent, may be tasked with recommending a candidate for board approval.

Frequency of Meetings

It is recommended that the board/committee meet on a regular basis. At a minimum, the board must meet two (2) times during the CSBG program year. The board must keep written minutes for each meeting, even if a quorum is not present. Minutes are to be made available to the public upon request.

Meeting notices, agendas, minutes along with the financial report received by the board, must be submitted to DOLA with the corresponding program report. Each sector of the board must be fairly represented. Voting by proxy is not permitted at meetings of the board.

Any decision, policy change or action by the board which would result in a change in the contracted program scope of work or in the approved line item budget, beyond the allowable variance, must be reported to DOLA within ten (10) days of the board action. Examples of such policy changes or actions include, but are not limited to, addition or deletion of programs or staff positions supported wholly or partly with CSBG funds. These changes will not go into effect until a request for contract amendment is submitted, agreed upon by all parties and fully executed.

Each recipient must establish and maintain a calendar of activities which will ensure that the board/committee annually participates actively in the development, planning and implementation and evaluation of programs funded with CSBG. Items requiring annual review include:

- Recipient's accomplishments and the community action plan.
- Programmatic eligibility criteria.
- Sub-recipients and application process, if applicable.
- Board bylaws and membership needs.
- Fiscal policy and procedures (alternately advisory committees will review fiscal reporting practices).
- Evaluation of the recipient's executive director (public agencies exempt).
- Personnel policy (public agencies exempt).

Allowable Board Costs

The following board/committee costs are allowed:

- Reasonable and actual expenditures incurred solely as a result of attending a scheduled board meeting or a meeting of a committee of the board.
- Reasonable cost of necessary meals furnished by the recipient for participating in scheduled meetings. Such costs are allowable only if the board members are not reimbursed as per diem or otherwise.

Board Training

Recipients should have a documented process that ensures initial and continued board training to include, as applicable: board responsibilities including program oversight and fiduciary responsibilities, results oriented management and accountability (ROMA), program and services information, the causes and effects of poverty, emerging issues and the, origin, source and impact of CSBG funding.

Board Oversight of Nonprofit Management Processes

The governing board of each private, non-profit recipient will conduct an annual performance evaluation of the recipient's executive director. This evaluation should include a statement of outcomes for which the executive director is responsible and provide a progress statement relative to the achievement of those outcomes. Dated evidence of the evaluation must be contained with the executive director's personnel file.

A succession plan for the position of executive director must be included in a recipient's operating documents. This plan must, at a minimum, address a hiring process to be used to

employ an executive director and a current job description for the position. Board approval of the plan is required of private, non-profit recipients.

Organizational Standards Section 2: VISION AND DIRECTION

Category 4: Organizational Leadership

Organizational leadership includes the board, executive and support staff and volunteers who interact with the CSBG program in an organization or department. Organizational leadership structure and processes must encompass all elements listed in the CSBG organizational standards, Category 4. These standards apply to both private (organization) and public (department) recipients except where noted. Category 4 standards to be implemented are:

- 4.1 The board/ committee has reviewed the organization/department's mission statement within the past 5 years and assured that the mission addresses poverty and the organization/department's programs and services are in alignment with the mission.
- 4.2 The organization/department's community action plan is outcome-based, anti-poverty focused and ties directly to the community assessment.
- 4.3 The organization/department's community action plan and strategic plan document the continuous use of the full results oriented management and accountability (ROMA) cycle or comparable system (assessment, planning, implementation, achievement of results, and evaluation. In addition, the organization/department documents having used the services of a ROMA-certified trainer (or equivalent) to assist in implementation.
- 4.4 The board/committee receives an annual update on the success of specific strategies included in the community action plan.
- 4.5 **a. Private** - The organization has a written succession plan in place for the CEO/executive director, approved by the governing board, which contains procedures for covering an emergency/unplanned, short-term absence of 3 months or less, as well as outlines the process for filling a permanent vacancy.
b. Public - The department adheres to its local government's policies and procedures around interim appointments and processes for filling a permanent vacancy.
- 4.6 **a. Private** - An organization-wide comprehensive risk assessment has been completed within the past 2 years and reported to the governing board.
b. Public - The department complies with its local government's risk assessment policies and procedures.

Category 5: Board Governance

Because the structure, roles and responsibilities of boards for private nonprofit governing boards, and public advisory boards and committees vary greatly, some of the organizational standards in this area differ for public agencies as noted below. Many of the standards echo the general requirements listed in the section of this document titled "Tripartite Board Requirements." Board structure and processes must encompass all elements listed in the CSBG organizational standards, Category 5. These standards apply to both private (organization) and public (department) recipients except where noted.

- 5.1 The organization/department's board/committee is structured in compliance with the CSBG act with at least 1/3 democratically selected representatives of the low-income community, 1/3 local elected officials (or their representatives) and the remaining membership from major groups and interests in the community.

- 5.2 The organization/department's board/committee has written procedures that document a democratic selection process for low-income board members adequate to assure that they are representative of the low-income community.
- 5.3 The organization's bylaws have been reviewed by an attorney within the past 5 years. *(Not applicable for public agencies.)*
- 5.4 The organization/department documents that each board/committee member has received a copy of the bylaws within the past 2 years.
- 5.5 The organization/department's board/committee meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its bylaws.
- 5.6 Each board/committee member has signed a conflict of interest policy within the past 2 years. *(For public agencies, a comparable local government document is allowable.)*
- 5.7 The organization/department has a process to provide a structured orientation for board/committee members within 6 months of being seated.
- 5.8 Board/committee members have been provided with training on their duties and responsibilities within the past 2 years.
- 5.9 The organization/department's board/committee receives programmatic reports at each board/committee meeting.

Category 6: Strategic Planning

Strategic planning is an organization/department wide process that is led by the board/committee and is ongoing. Unlike the community action plan which looks specifically at the CSBG programs offered and draws from the community needs assessment, the strategic plan is an overarching document that looks at both internal functioning and the community's needs. The strategic plan sets the tone for how the organization/department will operate, the goals that will be achieved, identifies the person(s) responsible and includes how success will be measured. Strategic planning must encompass all elements listed in the CSBG organizational standards, Category 6. These standards apply to both private (organization) and public (department) recipients.

The organization/department has a strategic plan in place that has been approved by the board/committee in the past 5 years. *(For public agencies, a comparable local government planning document is allowable. The department is responsible for developing a plan if one does not exist.)* Category 6 elements that must be included are:

- 6.1 The approved strategic plan or comparable document addresses the reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient.
- 6.2 The approved strategic plan or comparable document contains family, agency and/or community goals.
- 6.3 Customer satisfaction data and consumer input, collected as part of the community assessment, is included in the strategic planning process, or comparable planning process.
- 6.4 The board/committee has received an update(s) on progress meeting the goals of the strategic plan or comparable planning document within the past 12 months.

SECTION 3: OPERATIONS

(Includes Organizational Standards 7-9 of 9)

Personnel Policies and Procedures

Each recipient must provide DOLA with published personnel policies and procedures upon request that outlines consistent and equitable treatment of employees, and ensures that all employees fully understand the terms and conditions of their employment. Recipients will be monitored to ensure they are fulfilling their own local policies and procedures. Personnel policies and procedures must contain all elements listed in the CSBG organizational standards including:

- Agency rules governing vacations, sick leave, periodic salary increases and other conditions of employment.
- A description of any benefit plans with details on recipient and employee contributions to those plans.
- Any rules governing promotion, separation, resolution of grievances and employee conduct.

Recipients must adhere to the following standards governing the selection of personnel for employment in CSBG supported programs.

- Each recipient will employ persons who can perform their duties with competence.
- Every consideration must be given to providing employment opportunities to qualified, low-income persons.
- No recipient will discriminate in its hiring and personnel procedures against any applicant for employment or any employee because of race, creed, color, national origin, religion, handicap, gender or race.

Recipients must adhere to the following practices:

- The salary for each position should be in accordance with prevailing practice in comparable local public or private nonprofit agencies
- Time sheets and time allocation records for all employees must be maintained and must be signed by both the employee and the employee's supervisor
- An recipient may provide for periodic salary increases that are in accordance with prevailing practice in comparable local public or private nonprofit agencies
- Recipients must have an established employee grievance procedure. Employee grievances must be given prompt and fair consideration. Recipients will make provision for review of personnel actions by the governing body in any case in which there is a claim of unfair treatment or of dismissal without cause.

Recipients will maintain an employee-signed and dated job description indicating current tasks for which the employee is held accountable. All recipients must make available the [Community Action Code of Ethics](#) to staff and board/committee members working on the CSBG Program.

Responsible Administrators and Key Personnel

Following a voluntary resignation or involuntary termination or the hire of key leadership positions listed below, the recipient must advise DOLA of the change in the subsequent Semiannual Program Report. If there is a change in the role of the Responsible Administrator, DOLA should be informed when it occurs.

- Responsible Administrator
- Program Fiscal Officer
- Program Manager
- Executive Director
- Chief Financial Officer
- Tripartite Board or Advisory Committee Chair

The Responsible Administrator is listed in the contract and the individual in that role carries responsibility for administering the program effectively and is authorized to sign program and financial reports. In the case that the Responsible Administrator changes, the organization's Board of Directors Chair/President (in the case of a private non-profit recipient) or Department Head (in the case of a public or quasi-public recipient) should provide a signed letter identifying the new Responsible Administrator for the CSBG contract. In the same letter, the Board of Directors Chair/President (private non-profit recipient), Department Head (public or quasi-public recipient), or someone designated to sign on their behalf can identify other individuals they authorize to sign request for reimbursement forms, program reporting forms, or request contract amendments.

Fiscal Policies and Procedures

Recipients will provide DOLA with a fiscal operations manual that details all fiscal policies, and procedures for the recipient, including maintenance of records, procedures for disbursement, procurement procedures and all other relevant policies and procedures, upon request. Recipients will be monitored to ensure they are fulfilling their own local policies and procedures.

As a condition for receipt of CSBG funds, recipients must have a financial management system that meets the following standards. Financial systems must ensure that each recipient will:

- Be able to make accurate, current and complete disclosure of each CSBG award.
- Maintain records that adequately identify the source and application of funds for each CSBG award.
- Maintain effective control of all funds, property and other assets and must adequately safeguard all such assets and must assure that they are used solely for authorized purposes.
- Have established procedures for determining the reasonability, allowability and allocability of costs in accordance with the provisions of the applicable cost principle and terms of the contract.
- Make comparison of actual outlays with budget amounts for each grant or other agreement.
- Maintain accounting that is supported by source documentation.
- Have in place a systematic method to assure timely and appropriate resolution of audit findings and recommendations.
- Provide assurance that any agency delegated CSBG funds by the recipient must have a financial system which meets the CSBG organizational standards.

Recipients are recommended but not required by DOLA to procure fidelity bonding or other protection covering those who are authorized to sign checks, certify vouchers and/or handle or control funds (beyond petty cash), checks, securities or property.

Insurance Requirements

All public recipients must maintain at all times liability insurance to meet the Colorado Governmental Immunity Act either by purchase through a commercial policy or self-insurance. Additionally, the local government must maintain:

- **Workers' Compensation Insurance**
- **Commercial General Liability** needed if the work is being completed under the direction of a General Contractor
- **Automobile Liability Insurance**
- **Professional Liability Insurance**
- **Builder's Risk Insurance** needed on construction or rehabilitation of real property.
- **Umbrella/excess liability insurance** needs to be maintained for construction projects exceeding \$10,000,000 in total
- **Property insurance**
- **Flood insurance** only applies to buildings and improvements on real property in federally designated flood areas.
- **Pollution Liability** only needed if grant addresses pollution or environmental hazards.
- **Additionally Insured** - the State needs to be added if the recipient is completing work
- All evidence of insurance must be kept on file by the recipient and made available for inspection if requested by DOLA.

Eligible Expenditures

Expenditures must be in accordance with the approved budget as listed in the contract scope of work as detailed in Exhibit B. Expenses must be listed in the contract scope of work to be eligible for reimbursement even if they are listed in the budget. In general, recipients must list eligible expenses under reasonable headings (i.e. office supplies instead of pens) to allow both specificity and flexibility.

If a recipient expends grant funds contrary to the provision of the grant award, such action will be denied or require the repayment of those funds if the expenditure violated statutory provisions. DOLA may require repayment of expenditures that do not conform to the provisions of the grant award even if the expenditures are determined allowable by statutory provisions. DOLA has final authority to approve expenditures.

Personnel Expenses

CSBG funds may be used to pay staff salary and fringe benefits for the delivery of CSBG services, however, CSBG funds may only be used to pay for the pro rata share of vacation, leave, sick leave, FMLA retirement and other fringe benefits allocated to CSBG. CSBG funds may not be used to pay staff which is on pre-disciplinary or disciplinary leave.

Recipients must reimburse staff and volunteers for travel at uniform rates. Mileage reimbursement may not exceed the approved federal (IRS) rate.

CSBG funds may not be used to pay the salary of any staff member or the expenses of any agency engaged in activities designed to influence legislation or appropriations. Employees, volunteers and board members must not use CSBG funds for any political purpose or to influence any election for public or party office. The Federal Hatch Act outlines complete

requirements regarding employee conduct in relationship to running for elected office or influencing legislation

Capital Purchases

The federal grant rules (45 CFR § 75.439) require prior approval for capital expenditures. The definition of capital expenditures (45 CFR § 75.2) is an item with a useful life of more than one year and that equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000. Recipients should notify DOLA by specifically listing these items in their budget that is submitted annually and a response from DOLA approving the budget will constitute approval for those items. If a recipient would like to request approval for a purchase mid-program year they may submit a revised budget with those expenses specified and a response from DOLA approving the revised budget will constitute approval for those items.

Direct Operating Costs

Direct operating costs include travel, training, program supplies, direct service costs incurred by the recipient and other costs that are directly attributable to CSBG programming. These costs may include cost allocated expenses such as facilities, legal, accounting, information/technology or other program costs as outlined in [CSBG Information Memorandum \(IM\) 37](#).

Recipients are to follow established local procurement procedures or adopt the State's procurement procedures for the purchase of supplies, equipment and other materials. Procurement procedures should also address soliciting bids from contractors and/or consultants, as applicable.

Routine legal expenses incurred by a recipient by way of consultation or the obtaining of legal interpretations are allowable. Legal consulting contracts must comply with the procedures established elsewhere in this section. Legal expenses incurred which are the results of any legal action taken by the recipient either as a plaintiff or respondent will be disallowed.

Ineligible Expenses

CSBG funds may not be used for the purchase or improvement of land, or the purchase, construction or permanent improvement (other than low-cost residential weatherization or other energy related home repairs) of any building or other facility.

Costs that are not reasonable within the context of the overall budget may require additional documentation to verify eligibility. DOLA has the final authority in determining the eligibility of submitted expenses for the purpose of reimbursement.

Matching Funds

The use of federal funds such as CSBG for matching of funds for another Federal program is not permitted unless explicitly allowed by statute. [CSBG Information Memorandum \(IM\)135](#) gives guidance for using CSBG funds to match McKinney Vento Act funds for the purpose of homelessness assistance programs. Recipients are not required to provide a local match for the purpose of applying for and accepting CSBG funds.

Sub-recipients

Recipients who subcontract or delegate any part of its CSBG grant for service or administration activity must receive prior approval from DOLA. Subcontracted and/or sub-granted activity is bound by State and Federal CSBG requirements. Indirect charges on sub-

recipients are limited to the first \$25,000 per award, as required by Uniform Guidance. This limit applies to all subawards including both sub-grants and subcontracts.

Subrecipients are chosen in the case in which a recipient can better serve the needs of the community by partnering with another private or public agency. In some cases, counties participating in a multi-county service agency (MCSA) may be a sub-recipient of the MCSA leadership county to administer the CSBG program in their local area.

Recipients must review reimbursement requests from subrecipients to verify the eligibility of all submitted expenses prior to submitting those expenses to DOLA for reimbursement. Ineligible expenses will be disallowed by DOLA, even if the recipient has already reimbursed the sub-recipient. Recipients must monitor sub-recipients on an annual basis to ensure compliance and provide a copy of the report to DOLA upon request.

DOLA recommends that recipients develop a standard process for considering subrecipient applications which may include a notice of funds available (NOFA), application and/or interview process, review of applications, recommendation of awards to the tripartite board/advisory committee, and notification process for applicants. Approval of all sub-recipients should be reflected in the board/ committee minutes, and awards may also be approved by the board of county commissioners, if locally required.

Indirect Expenses

Recipients must comply with the following guidance on the two methodologies DOLA makes available to claim administrative expenses necessary for program administration. The two options available are indirect cost rate, and cost allocation of direct administrative expenses.

Indirect Cost Rate:

Indirect expenses should reflect true organizational overhead, which benefits the department as a whole and are costs not specific to CSBG. For CSBG recipients using indirect expense rate methodology to claim administrative expenses, DOLA will review budgets with indirect rates that meet the following requirements.

- Federally negotiated indirect rate.
- 10% de minimus rate.
- *DOLA cannot, at this time, accept indirect rates negotiated by other State agencies.*
- Please note that indirect rates are limited to the first \$25,000 of subawards that your agency distributes, if applicable.

Cost Allocation of Direct Administrative Expenses:

Cost allocation of direct administrative expenses reflects administrative costs that can be directly attributable to the CSBG program. For CSBG recipients using cost allocation methodology to claim administrative expenses, DOLA will review budgets that list administrative costs as direct expenses.

- Cost allocation methodology should not contain costs that are charged to an indirect rate if the recipient also uses indirect methodology.
- Since recipients do not have a negotiated indirect rate with DOLA, it may be possible that a recipient could use both direct cost allocation and charge the de minimus rate, even if there is an indirect rate negotiated with another State agency.

Request for Reimbursement

DOLA provides recipients with a standard reimbursement request form and instructions.

Backup documentation consists of:

- Request for Reimbursement Form.
- General Ledger from the time period of the reimbursement request. This should include date of invoice, date of payment, vendor, amount and purpose of expense.
- Monthly Cost Summary - identifying each item by category (salary, fringe, indirect costs, rent, etc.), if this detail is not captured in the General Ledger.
- General Ledger payroll detail with fringe benefits from the time period of the reimbursement request, if claiming reimbursement for payroll costs.

If you are requesting reimbursement for sub-recipients, please also include:

- Proof of payment to sub-recipients by the County or Organization.
- Detailed invoice from the sub-recipients, listing specific expenditures via general ledger and/or monthly cost summary.

Regarding additional information:

- *Do not include program or client information in monthly submissions.* This includes items such as copies of intake forms, affidavits of legal residency, letters from landlords/utility companies/medical providers or other client-specific forms. These forms should be retained in client files and be available for review if there are questions about client or expense eligibility.

Recipients must report CSBG expenditures using the Request for Reimbursement Form as provided by DOLA to summarize expenditures made and grant funds unexpended for each CSBG award, report the status of grant cash received and requested advances and reimbursements.

Quarterly reimbursement requests/reports are due April 30, July 31, October 31 and January 31 for the prior 3-month period. Recipients receiving more than \$100,000 annually are requested to submit monthly.

Requests for Reimbursement that are late or require correction or additional information delay the processing of payments. In the event that a report is late or inaccurate, payment may not be made until the report is corrected, received and verified as accurate.

At the point that all funds for a particular grant award have been received, receipted and expended, the recipient must submit a clearly identified “FINAL” Request to DOLA.

Carry-over Funds

The CSBG grant contract period is January 1 - December 31. Any funds not obligated by a recipient at the conclusion of the grant period must be recaptured and rolled over into the following grant year. These funds must be fully expended no later than June 30 of that year.

If a recipient does not spend the full allocation by June 30, the recipient must submit a spending plan by that date which includes monthly projections to ensure those funds will be spent by the federal deadline of September 30.

If a recipient indicates they are unable to spend the funds by September 30, or the spending plan lacks sufficient detail for DOLA to be confident in the plan, any remaining funds may be

de-obligated from the contract. Returned funds will be redistributed to the remaining recipients using the distribution formula, pursuant to CSBG statute.

Secondary Review

Based on the results of each recipient's risk assessment, DOLA requires a secondary review of all backup documentation for expenses requested for reimbursement.

Low-risk recipients are required to complete a secondary review once annually for the month of September, due on October 31.

Standard-risk recipients are required to complete a secondary review twice annually for the month of March, due on April 30, and for the month of September, due on October 31.

High-risk recipients must complete secondary reviews as specified in their quality improvement plans depending on the areas of deficiency.

Please see your annual risk assessment letter for more information about required review and deadlines for your agency/organization.

Recipients will submit a secondary review packet that includes copies of receipts, payments, timesheets and any other relevant supporting documents for your program. Any identifying client information will be blacked out or removed from documents submitted.

Retention of Records

Financial records, supporting documents, statistical records and all other records, in whatever format pertinent to a CSBG grant award are covered by these retention requirements:

- Records must be retained for a minimum of five (5) years, or longer if required by law.
- If any litigation, claim or audit has not been fully resolved before the expiration of the five (5) year period, all relevant records must be retained until one (1) year after the resolution of such litigation, claim or audit.
- The retention period starts ninety (90) days after the end date of the grant period.
- Recipients and their sub-recipients must provide appropriate DOLA staff with access to all books, records, documents and compilations of data relating to CSBG supported activities.

Single Audits

By law, recipients expending \$750,000 or more in Federal funding during their fiscal year must be audited annually using methodology defined in Uniform Guidance.

The audit must be distributed within thirty (30) days of its completion and not later than thirteen (13) months after the audit period. Each recipient must submit copies of the audit report package to DOLA that include:

- A copy of the data collection form.
- Financial statements and schedule of expenditures.
- Auditor's reports on financial statements and schedule of expenditures, internal control and compliance as well as a schedule of findings and questioned costs.
- A summary schedule of prior audit findings.
- The corrective action plan, if applicable.
- A copy of the management letter, if issued.

Recipients must submit audit documentation to the Federal Audit Clearinghouse in accordance with the requirements of Uniform Guidance.

Organizational Standards Section 3: Operations and Accountability

Category 7: Human Resources Management

The organizational standards in this category ensure a strong human resources infrastructure for the delivery of high quality services to benefit low-income communities. Human resource processes must encompass all elements listed in the CSBG organizational standards, Category 7. These standards apply to both private (organization) and public (department) recipients except where noted. Category 7 requirements include:

- 7.1 The organization has written personnel policies that have been reviewed by an attorney and approved by the governing board within the past 5 years. *(Not applicable for public agencies.)*
- 7.2 The organization makes available the employee handbook (or personnel policies in cases without a handbook) to all staff and notifies staff of any changes. *(For public agencies, department follows local government policies.)*
- 7.3 The organization/department has written job descriptions for all positions, which have been updated within the past 5 years. *(For public agencies, department may not have oversight of updates.)*
- 7.4 The governing board conducts a performance appraisal of the CEO/executive director within each calendar year. *(For public agencies, follow local government procedure.)*
- 7.5 a. Private - The governing board reviews and approves CEO/executive director compensation within every calendar year.
b. Public - The compensation of the department head is made available according to local government procedure.
- 7.6 The organization has a policy in place for regular written evaluation of their employees by their supervisors. *(For public agencies, follow local government procedure.)*
- 7.7 The organization has a whistleblower policy that has been approved by the governing board. *(For public agencies, distribute any existing local government policy to the advisory board/ committee.)*
- 7.8 All staff participates in a new employee orientation within 60 days of hire. *(For public agencies, follow local government procedure.)*
- 7.9 The organization/department conducts or makes available staff development/training (including ROMA) on an ongoing basis.

Category 8: Financial Operations and Oversight

Fiscal accountability is maintained through required audits, monitoring and compliance with Federal OMB circulars. This section relates to both fiscal oversight as well as day to day operations. The management of CSBG funds must encompass all elements listed in the CSBG organizational standards, Category 8. These standards apply to both private (organization) and public (department) recipients except where noted. Category 8 requirements include:

- 8.1 The organization/department' annual audit (or audited financial statements) is completed by a Certified Public Accountant *(private recipients only)* on time in accordance with Title 2 of the Code of Federal Regulations, Uniform Administrative Requirements, Cost Principles and Audit Requirement (if applicable) and/or State

audit threshold requirements. *(For public agencies, may be included in the recipient's full audit.)*

- 8.2 All findings from the prior year's annual audit have been assessed by the organization and addressed where the governing board has deemed it appropriate. *(For public agencies, follow local government procedure.)*
- 8.3 The organization's auditor presents the audit to the governing board. *(For public agencies, board/committee must be notified of the document's availability.)*
- 8.4 The governing board formally receives and accepts the audit. *(Not applicable for public agencies.)*
- 8.5 The organization has solicited bids for its audit within the past 5 years. *(Not applicable for public agencies.)*
- 8.6 The IRS Form 990 is completed annually and made available to the governing board for review. *(Not applicable for public agencies.)*
- 8.7 The board/committee receives financial reports categorized by program at each regular meeting that include a profit and loss statement, budget to actual comparisons, and a balance sheet/statement of financial position. *(For public agencies, follow local government procedure.)*
- 8.8 All required filings and payments related to payroll withholdings are completed on time. *(Not applicable for public agencies.)*
- 8.9 The governing board annually approves an organization-wide budget. *(For public agencies, follow local government procedure.)*
- 8.10 The fiscal policies have been reviewed by staff within the past 2 years, updated as necessary, with changes approved by the governing board. *(Not applicable for public agencies.)*
- 8.11 A written procurement policy is in place and has been reviewed by the governing board within the past 5 years. *(Not applicable for public agencies.)*
- 8.12 The organization documents how it allocates shared costs through an indirect rate or through a written cost allocation plan. *(Not applicable for public agencies.)*
- 8.13 The organization has a written policy in place for record retention and destruction. *(For public agencies, follow local government procedure.)*

Category 9: Data and Analysis

Data that shows the collective impact of programs is necessary to demonstrate the impact of the CSBG program. Each organization/department must effectively track data related to client and program outcomes to measure and demonstrate the success of CSBG both individually and as a collective network. Data and analysis processes must encompass all elements listed in the CSBG organizational standards, Category 9. These standards apply to both private (organization) and public (department) recipients. Category 9 elements required:

- 9.1 The organization/department has a system in place to track and report client demographics and services customers receive.
- 9.2 The organization/department has a system or systems in place to track family, agency and/or community outcomes.
- 9.3 The organization/department has presented to the board/committee for review or action, at least once within the past 12 months, an analysis of the agency's outcomes and any operation or strategic program adjustments and improvements identified as necessary.
- 9.4 The organization/department submits its annual CSBG Information Survey (IS) data report and it reflects client demographics and organization/department-wide outcomes.

Appendix I - Recent Program Manual Updates

10/25/2021 Revision

- **Terminology Changes - multiple locations**
Minor changes in terms to be consistent with the terminology outlined by OCS in IM #162, replacing “grantee” with “recipient” or “eligible entity.”

7/20/2021 Revision

- **Requirements for Proof of Immigration Status - page 5**
This policy change aligns the state position on proof of immigration status requirements with guidance provided by the Office of Community Services.
- **Tripartite Board/Advisory Committee Vacancies - page 12**
The updated Tripartite Board/Advisory Committee vacancy policy was updated to allow more time for agencies to fill tripartite board vacancies and to align reporting on actions taken to address board vacancies with existing reporting processes.
- **Responsible Administrators and Key Personnel - page 16**
The updated policy provides clarity on the changes in key personnel that should be reported to DOLA and aligns that reporting with existing processes.
- **Capital Purchases - page 19**
This section outlines the procedures for requesting approval for capital purchases required by the federal grant guidelines.