

COMMUNITY SERVICES BLOCK GRANT

FY 2024 REQUEST FOR WORK PLAN

FOR THE PERIOD

OCTOBER 1, 2024- SEPTEMBER 30, 2025

STATE OFFICE OF ECONOMIC OPPORTUNITY

280 STATE DRIVE

HC 1 NORTH

WATERBURY, VERMONT

05671-1050



SECTION 1: INTRODUCTION & GENERAL INFORMATION

A. PROGRAM PURPOSE

The purpose of the Community Services Block Grant (hereinafter called CSBG) program is to ameliorate the causes and effects of poverty through the provision of a range of services and activities designed to have a measurable and potentially major impact on the causes of poverty in Vermont, especially in those communities where poverty is a particularly acute problem.

B. BACKGROUND INFORMATION

The State of Vermont accepted administrative responsibility for the CSBG as of October 1, 1981. The State Office of Economic Opportunity) was designated as the grantee for the CSBG program by the Governor.

Consistent with the intent of Congress in establishing block grants, the Department of Health and Human Services, Office of Community Services, imposed no requirements, restrictions or regulations other than those contained in the authorizing legislation. Of particular note with regard to the requirements contained herein, the State is required to:

"...provide that fiscal control and fund accounting procedures will be established as may be necessary to assure the proper dispersal of and accounting for Federal funds paid to the State under this subtitle, including procedures for monitoring the assistance provided under this subtitle..."

And the Reauthorization Act included the following:

"all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management System... ...for measuring performance and results and a description of outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization."

In the absence of specific requirements for the management of operations and the control of funds, the State has developed an administrative plan for the control of funds and activities that is consistent with sound management practices, while at the same time providing maximum flexibility to the operators of CSBG programs. The State is pleased with the progress made in the implementation of the CSBG by all parties involved and is confident that the systems developed provide, in large measure, the structure and procedures necessary to meet the requirements outlined above.

C. NATIONAL GOALS & DEFINITION OF POVERTY PROBLEMS

The poverty problems established by the CSBG Act as amended in 2000, are:

- I. Unemployment/Underemployment
- II. Inadequate Education
- III. Use of Available Income/Lack of Income
- IV. Inadequate Housing

V. Inability to Meet Emergency Needs

VI. Remove Obstacles and Solve Problems which block the Achievement of Self Sufficiency

VII. Achieve Greater Participation in the Affairs of the Community

VIII. Starvation/Malnutrition

IX. Needs of Youth in low-income communities, and

X. Coordinate and Establish Linkages between governmental and other social services programs to ensure the effective delivery of such services to low income individuals: and

In 2017, the Office of Community Services established a new CSBG Annual Report based on a national CSBG Theory of Change (<https://nascsp.org/csbg/csbg-resources/roma/roma-next-generation/theory-of-change/>). The Annual Report and the Theory of Change organize the CSBG poverty problems into eight domains of work at the individual, family, community and agency level in order to support **Three National Goals**:

Goal 1: Individuals and families with low incomes are stable and achieve economic security.

Goal 2: Communities where people with low incomes live are healthy and offer economic opportunity.

Goal 3: People with low incomes are engaged and active in building opportunities in communities.

Service & Strategy Domains:

Agency Capacity Building

Civic Engagement and Community Involvement

Education and Cognitive Development

Employment

Health and Social/Behavioral Development

Housing

Income, Infrastructure, and Asset Building

Services Supporting Multiple Domains

D. PURPOSE OF THE REQUEST FOR WORK PLAN

The State is seeking a comprehensive plan developed by the Community Action Agency to meet the purpose of the CSBG Act. The work plan allows for a clear presentation of the correlation between the agency plan and budgets; and allows for the development and presentation of performance indicators and outcome measures by which each agency will be able to monitor their progress toward the full implementation of Results Oriented Management and Accountability (ROMA) and attainment of the three National Goals. The Request for Work Plan package consists of the following major components:

AGENCY & COMMUNITY BACKGROUND

COMMUNITY ASSESSMENT & STRATEGIC PLAN

ROMA IMPLEMENTATION PLAN

MANAGEMENT AND ADMINISTRATION

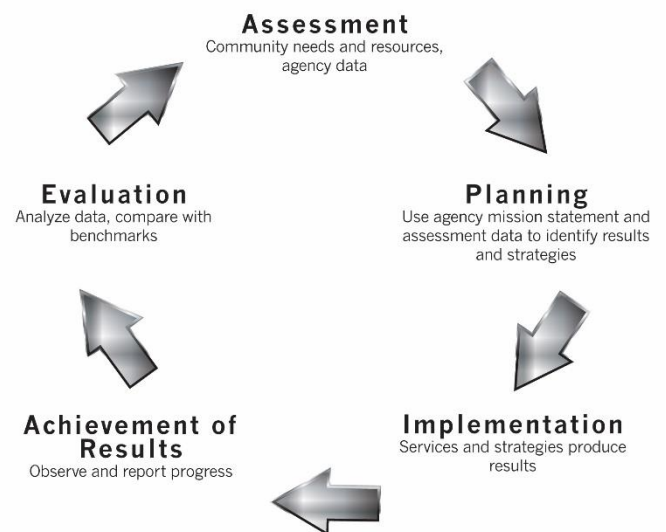
BUDGET

Since 2001, the Community Services Block Grant Act has required all CSBG eligible entities to participate in the Results-Oriented Management and Accountability (ROMA) system, and the State Office of Economic Opportunity expects Vermont's Community Action Agencies to be fully and actively engaged in the five-stage cyclical ROMA process of: Assessment; Planning; Implementation; Achievement of Results; and Evaluation. To be effective, this must be reinforced at all levels of the organization, including the board of directors. This strategic approach ensures that Community Action Agencies:

- I. have a complete and current understanding of the type and scope of poverty problems in their local communities;
- II. plan their programming and initiatives to address those needs identified and can select metrics against which program effectiveness will later be tested as well as targets and benchmarks;
- III. operate programs that make full and strategic use of appropriate resources;
- IV. achieve, measure, and report on results in the form of progress made towards performance indicators and the national poverty goals; and
- V. can evaluate overall program effectiveness by analyzing data and comparing against targets and/or benchmarks.

The Work Plan outlines the Agency's mission, vision and provides a basic community profile. It highlights, at a high level, the top needs and strategies identified through the Agency's Community Assessment and Strategic Plan, and connects these needs and strategies to its annual plan of work. The Work Plan identifies specific areas of work (programs and initiatives) for the coming year, target populations, and results to be achieved, with a specific focus on how the Agency will establish linkages and how it will adjust its approach based on past results. The Work Plan describes how the Agency will manage and administer the Community Services Block Grant and provides a budget plan for the year. The CSBG Work Plan demonstrates the Agency's plan as a part of the full ROMA cycle.

The Results Oriented Management and Accountability Cycle



ASSURANCES

Responses by the Community Action Agency to the Request for Work Plan will include a signed list of Assurances which will delineate all necessary assurances relative to activities undertaken and the expenditures incurred with funds provided under the CSBG Act.

E. REPORTING REQUIREMENTS

Data collection involves the collection of information on: unduplicated number of persons served, number of households served, various demographic information, *etc.* that act as indicators of progress being made on various poverty programs and management functions. Data collection systems must be capable of providing all necessary reports to the State Office of Economic Opportunity as required by the Office of Community Services in the CSBG Annual Report, Modules 1 - 4. The excel template for the Modules 3 and 4 of the CSBG Annual Report (National Performance Indicators), is provided as part of this Request for Work Plan. Use of Module 3, Community Level Indicators, is optional. Agencies are encouraged to use narrative reports to describe community level work and results.

Vermont's five Community Action Agencies and the State Office of Economic Opportunity have agreed upon a set of National Performance Indicators at both the Individual and Family Level, these were revised at a statewide ROMA meeting on August 3, 2022. Agencies are required to report on the agreed upon National Performance Indicators. Additional agency-specific measures are encouraged.

Monitoring of the agency's operations involves evaluating the success made toward the National goals and the satisfaction of State requirements concerning management activities.

CSBG Report**Due Date**

CSBG-0001
Invoice/Financial Statement

Monthly, due at State Office of Economic Opportunity the **15th** of the month following the report month.

CSBG-0002
Request for Cash Advance

May be requested Monthly or Quarterly per the terms of the grant agreement.

-Agency National Performance Indicators.
Reporting on Agency progress made toward the Three National Goals. (Modules 4)

Quarterly, due at State Office of Economic Opportunity the **30th** of the month, following the report period.

- Board roster on provided template with: names, addresses and phone numbers of current members and which sector each represent. Also include the dates of each board member's term of office. Indicate the current chairperson, and each member's committee responsibilities. If there are any vacant positions, note the length of the vacancy and describe the current effort underway to fill the vacancy according to the agency's bylaws.

-Progress Report on any active Technical Assistance Plan (e.g., unmet Organizational Standards)

The complete minutes from all Grantee's board meetings, including committee meetings, shall be transmitted to the State within 30 days of the board meeting.

Report on CSBG Eligible Entity Expenditures, Capacity, and Resources (Module 2) and CSBG narrative highlighting agency programs or initiatives in format specified by the Vermont Office of Economic Opportunity

Annually, due at State Office of Economic Opportunity in December.

All CSBG clients will require new intakes or recertification to certify eligibility for FFY 2025.

F. GENERAL INSTRUCTIONS

The agency's proposal will not be considered unless it complies with all requirements listed in this request. The acceptable proposal submitted will be negotiated by the staff at the State Office of Economic Opportunity. The purpose of the negotiations is to arrive at a mutually agreed upon approach to meeting the requirements of the CSBG Act in furthering its goals and purpose.

Successful negotiations will result in the award of a grant to be entered into between the State and the Community Action Agency for the provision of services under the CSBG.

1. General Information: Section 1 (this section) provides an introduction and general information and assistance in preparing the work plan proposal.

2. Specifications for CSBG Work Plan: Section 2 contains the specific instructions for completing the work plan proposal. The responses to these sections will comprise the actual work plan narrative and budget. Please see the list of attachments below to be included in the work plan proposal.

3. Assembly of Application: Work Plan sections are listed below and should be specifically marked within the body of the proposal. Sections should be numbered using the following pagination format in the upper right corner of the document page:

Example: Agency Name, Date
 Section XXX
 Page X of X

Please include a list of attachments. To facilitate review and processing of the application, please assemble the materials as follows:

- ☐ A. Cover Sheet
- ☐ B. Agency & Community Background
- ☐ C. Community Assessment & Strategic Plan
- ☐ D. ROMA Implementation Plan
- ☐ E. Management and Administration
- ☐ F. Budget

Attachments:

- ☐ List of Attachments
- ☐ G. Signed Agency Assurances (*Document provided – needs signature*)
- ☐ Board Roster
- ☐ Job Descriptions for all positions funded in whole or in part with CSBG funds
- ☐ Indirect Cost Rate Agreement
- ☐ Other Attachments (please specify in List)

DUE DATES

Proposals must be received electronically on or before September X, 2024:

Kristin Lyons, State Office of Economic Opportunity

kristin.lyons@vermont.gov

On or before September XX, 2024, the proposal will be reviewed by the Office of Economic Opportunity and the Community Action Agency will meet with State Office of Economic Opportunity staff (if necessary) to review the proposal, suggest changes or make any other recommendations in order to fully understand the proposal and its goals.

All proposals will be either granted or denied by October 1, 2024. The award of funds is contingent upon a Congressional appropriation to operate the program.

SECTION 2: CSBG WORKPLAN SPECIFICATIONS – ANNUAL COMMUNITY ACTION PLAN

A. COVER SHEET

Please provide the following names and contact information.

	Name	Email	Phone #
Executive Director			
CSBG Contact			
Fiscal Contact			
Annual Report (NPI) Contact			
Organizational Standards Contact			

If the agency subgrants any CSBG funds, provide contact information and address for any subgrantees.

B. AGENCY & COMMUNITY BACKGROUND

1) Agency Description, Mission & Vision (approx. 1 page)

Provide a brief description (approx. 1 page) of the agency's mission (purpose), a description of the agency and its history, and a description of the long-term goals of/desired change from the agency's work (vision).

2) Community Profile (1-2 pages)

Provide a description of the agency's service area and target populations. List the communities the agency services. Describe the agency's basic assumptions about poverty causes and conditions affecting the community and the target population(s) identified.

C. COMMUNITY ASSESSMENT & STRATEGIC PLAN

1) Summary (1-2 pages)

Provide a short (executive) summary of the Agency's Community Assessment & Strategic Plan. The Agency submits its current and complete strategic plan and community assessment as part of the annual assessment of organizational standards.

The community assessment involves the identification of the not just the needs but also the strengths of the low income population and communities served. It involves the prioritization of need and directs the identification of specific strategies, which build on community strengths, to address these needs and issues and the poverty problem as identified in the CSBG Act.

Summarize key findings on the needs and strengths of communities assessed. If updates to either of these documents are in process, use the most recently completed community assessment and strategic plan, and reference work in process, as appropriate.

Describe the process used to apply the needs and strengths, as identified in the community assessment, to the development of the Agency's strategic plan and annual action plan (as presented in this submission) to address poverty problems within the three National Goals. (1-2 paragraphs)

2) Needs and Goal/Strategy Statement(s)

Provide information on the top needs identified through the agencies Community Assessment Process, as well as your agency's strategic plan goal(s) to address each. Provide information about the needs, as well as goal and strategy statements for the agency's top identified community needs. **Each Program and Initiative reported in the CSBG Annual Report and included in this Annual Workplan must be linked to the agency's identified needs and strategic goals included in the Workplan.** There will be one or more Statement(s) linked to a Program/Initiative. It is not expected that an agency have a Statement for every Domain. It's recommended that Statements be numbered easy reference.

For each Need and Goal/Strategy Statement, provide the following:

- 1) Identify the CSBG Domain
 - Agency Capacity Building
 - Civic Engagement and Community Involvement
 - Education and Cognitive Development
 - Employment
 - Health and Social/Behavioral Development
 - Housing
 - Income, Infrastructure, and Asset Building
 - Other
 - Services Supporting Multiple Domains
- 2) Describe the Needs & Resources (from Community Assessment)
- 3) Provide a Goal/Strategy Statement(s)
 - Individual/Family Level

Community Level
Agency Level

Agencies can enter a statement at the individual/family level, the community level and/or the agency level. Agencies are not required to have a statement for all three levels, but should have a statement for at least one. See attached example and optional template.

D. ROMA IMPLEMENTATION PLAN

With a completed community assessment and strategic plan, the development of the Annual ROMA Implementation Plan is the next step. The poverty areas (domains) have been identified and developed for agency action. The ROMA Implementation Plan is provided for the implementation of the Three National Goals within a broad framework of outcome measures and National Performance Indicators.

Linkages

The CSBG Act specifically requires that agencies will coordinate and establish linkages in its work to address poverty problems. Within Section 1 below, agencies must identify and highlight how the agency will coordinate and establish linkages:

- a) to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (Section 676(b)(5));
- b) to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations, (Section 676(b)(3)(B));
- c) locally with WIOA workforce development systems, as well as other employment and training activities (Section 676(b)(5));
- d) with other organizations, including faith-based organizations, charitable groups, and community organizations (Section 676(b)(9));
- e) with other public and private resources (Section 676(b)(3)(C)).
- f) to support innovative community and neighborhood-based initiatives relative to the purposes of CSBG.

The State Office of Economic Opportunity will send an electronic template of the FY 2023 National Performance Indicators to all eligible entities in Vermont with the Request for Work Plan. Eligible entities will complete the template and return electronically to the State Office of Economic Opportunity by the Request for Work Plan due date as part of their proposed CSBG Work Plan. Each quarter, the Community Action Agency will submit their updated cumulative year-to-date data to the State Office of Economic Opportunity. Year-end reports will be submitted as part of the statewide CSBG annual report to HHS, ACF Office of Community Services.

1) Programs & Initiatives

Provide a description of each program or initiative that the agency will be reporting on in the CSBG Annual Report. Programs report on Module 4, Individual and Family Level National Performance Indicators. Initiatives will report on Module 3, Community Level National Performance Indicators (optional) or in narrative format, describing community level results.

Office of Economic Opportunities will not be submitting Module 3 as part of the Vermont Annual CSBG report.

In order to demonstrate how each Program helps the agency to achieve its strategic goals and address identified community needs, each Program and Initiative must be connected to a need/goal statement.

For all Programs and Initiatives, provide the following (see attached example and optional Program Summary template):

Program/Initiative Name

Brief description of the Program or Initiative, including information about the target population(s) and how the agency has been or will coordinate and/or establish linkages (see a – f above).

Identify which need(s), goal/strategy statement(s) tie to this Program or Initiative

If this is not a new Program or Initiative, provide an analysis of past results and a description of any new approaches or strategies as a result of the analysis.

For Programs, identify which Services (from the CSBG Annual Report Module 4: Individual and Family Level) will be counted. Identify which National Performance Indicators will be used. Note that the Program Summary may link to more than one Need/Goal Statement.

Domain

Service(s)

National Performance Indicator(s)

Use the excel template for Module 4 to set targets.

For Initiatives, please update or complete a Community Initiative Status Form (Module 3, Section A), adapt the Initiative Status Form as needed, or provide in narrative format.

Domain

Identify which Strategies (Module 3, Section C) will be used. If “other”, provide a brief description.

Identify what results will be achieved, use of the Community NPIs – Counts of Change or Rates of Change (Module 3, Section B) is optional.

Set targets over the expected duration of the initiative.

2) National Performance Indicators – please complete attached excel templates for Module 4.

Vermont's eligible entities report quarterly outcome data to the Vermont Office of Economic Opportunity. Each entity reports on a minimum number of "common" indicators agreed upon by the State Office of Economic Opportunity and the Community Action Agencies. Agreed upon Vermont Indicators are required (highlighted in yellow). In addition, agencies choose additional performance indicators from the national list, and develop agency-specific indicators consistent with the Community Services Block Grant. Additional and agency-specific outcome measures are identified by each eligible entity as part of their proposed Work Plan based on the needs identified.

Targets must be identified for all NPIs. to be tracked and reported. The Community Action Agency will continue to report on these indicators quarterly during the program year. For all indicators selected, the number of participants served (I) and target # achieving the outcome (II) must be completed.

E. MANAGEMENT AND ADMINISTRATION

1) Board Operations

a. Describe the composition of your agency's board of directors (i.e., private sector, public sector, low-income representative) including total membership and number of representatives from each sector. Describe the manner in which representatives are selected.

b. Provide a board roster with: names, addresses and phone numbers of current members and indicate which sector each represent. Also include the dates of each board member's term of office. Indicate the current chairperson. Indicate each member's committee responsibilities. If there are any vacant positions, note the length of the vacancy and describe the current effort underway to fill the vacancy according to the agency's bylaws.

c. Describe the board's function, frequency of meetings of the general assembly and frequency of committee meetings.

By-laws are submitted annually as part of the assessment of organizational standards.

2) Organizational Structure

Provide a description of the agency's internal organizational structure, i.e. divisions, departments, units, as appropriate. Explain the function of each division and its staffing pattern.

3) Job Descriptions

Attach job descriptions for all positions funded in whole or in part with CSBG funds. Please include job descriptions supported by administration funds.

4) Operating Procedures

- a. Describe the procedure your agency uses to identify eligible clients, and to recertify eligibility annually. If procedures are by department, describe or attach procedures for any department or program funded in whole or part by CSBG. Please note Appendix 1, Section A Eligibility.
- b. Provide a description of the methods your agency uses to control CSBG eligible applications, to control applications which are not CSBG eligible but, applicants who are eligible for other agency programs and how you control applications completed by applicants who are not eligible to receive service under any agency-sponsored program.
- c. Describe your agency's policy with respect to nondiscrimination and affirmative outreach.
- d. Describe the system your agency utilizes to assess and ensure that client needs have been met.

5) Evaluation and Control Systems:

- a. Provide a description of the system you will use to perform an ongoing evaluation of the effectiveness of programs and activities operated under the CSBG.
- b. Describe how you use ROMA measures to evaluate the effectiveness of the Agency in meeting the national goals, including program and or board involvement and frequency of review.

6) Financial Management

- a. Provide a general description of your agency's finance department and identify key personnel and their responsibilities. Also describe the relationship between your agency's central administrative office and satellite/field offices, relative to financial transactions.
- b. To ensure the proper management of federal grant funds, the State requires the Community Action Agency to develop a financial management plan that adopts and assures compliance with the OMB Uniform Guidance. Each agency's financial management policies and procedures are provided during the annual assessment of organizational standards. Financial policies and procedures must address:
 - Cash receipts, the process for recording receipt, verifying relationship check amount remittance voucher, timing of bank deposit, position responsible for making deposit, etc.
 - Cash Payments: the process whereby payments for goods and services are initiated, including documentation required to make payment, positions authorized to sign checks and the number of signatures required to validate checks.
 - Bank Reconciliations: the procedure utilized to compare cash recorded, per the accounting records, with cash reported by the bank. Including the frequency with which bank reconciliations are conducted and indicate the position responsible for ensuring the process is completed.

- Payroll System: the items of control (i.e., time sheets) and procedure utilized (i.e., supervisory review/signature) to ensure the validity and accuracy of payments under the payroll system.

Use this section to provide additional description of any specific procedures related to CSBG, only as necessary. **Do not attach financial policy manuals to the CSBG Workplan submission.**

F. BUDGET

Based on the following, prepare a line item budget for the planned expenditure of federal funds. This budget should total the figure below (F.2.) and should not include any anticipated agency carry-forward from the previous fiscal year.

1) General

In the absence of firm budget figures, we are proceeding on the assumption that the State's award will be level-funded at **\$4,021,915**. Allocations to Vermont's five Community Action Agencies have been developed by applying the State Office of Economic Opportunity allocation formula to the 90% statutory pass-through of **\$3,619,724**.

The budget developed for this proposal should be developed in such a way that if Congress significantly alters the level of funds, the agency can amend its work plan with the least amount of disruption to the provision of services as possible.

2) CSBG Allocations - Anticipated Award Amounts

BROC	\$644,630
Capstone	\$689,322
CVOEO	\$1,061,299
NEKCA	\$662,544
SEVCA	\$561,929

3) Specific Budget Instructions

a. Cost Categories: The cost categories to be used in preparing your budget are Administration and Program Operations. The cost categories should be further divided into Personnel and Operating (all non-personnel costs) components. **To facilitate desk reviews, these cost categories must remain consistent between Document C "Budget"; Document B "Monthly Expenditure Plan"; Document CSBG-0001 "invoice/financial statements"; and any proposed budget modification documents. Budget documents not submitted in this format may be rejected.**

b. Administration: No limitations are imposed with regard to amounts allocable for administrative expenses; however, administrative expenses should be maintained at the lowest level possible that will ensure the implementation of efficient operations.

c. Audit: The agency is to conduct its own audit of its CSBG funds in conformance with the OMB Uniform Guidance. The estimated cost of the audit shall be a separate item within the budget.

d. Indirect Costs: Agencies that have an approved indirect cost rate must include a copy of the Indirect Cost Negotiation Agreement entered into with the cognizant federal agency.

e. CSBG Expenditure Domain: Please provide the **estimated total** for each CSBG Expenditure Domain.

Generic line items such as “Program Subsidies” or “Program XYZ” will **not** be allowed.

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G. COMMUNITY ACTION AGENCY ASSURANCES

(Include signed page with submission)

1. that it will use funds granted as a result of the application to provide a range of services and activities having a measurable and potentially major impact on causes and effects of poverty in the area to be served;
2. that it will provide services and activities to remove obstacles and solve problems which block the achievement of self-sufficiency and other services and activities as appropriate to address identified causes and conditions of poverty;
3. that it will coordinate and establish linkages to assure the effective delivery of and coordination of CSBG services to low-income people and communities, and fill identified gaps in services through the provision of information, referrals, case management and follow-up (as required by the assurance under Section 676(b)(3) and (5) of the CSBG Act).
4. that it will coordinate the provision of employment and training activities through statewide and local WIOA workforce development systems (as required under Section 676(b)(5) of the CSBG Act).
5. that it will coordinate and form partnerships with other public and private resources and organizations, including faith-based organizations, charitable groups, and community organizations (as required under Section 676(b)(9) and (b)(3)(C) of the CSBG Act).
6. that it will use funds to support innovative community and neighborhood-based initiatives (as required under Section 676(b)(3)(D) of the CSBG Act).
7. that it will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals (as required under Section 676(b)(4) of the CSBG Act).
8. that the Community Action Agency meets the requirements of Section 675(c)(3) of the Act relating to board composition. It must provide as an addendum to the application a current list of board members with the groups, organizations or sectors they represent;
9. that it will not undertake any political activities prohibited by the Act with these funds including, but not limited to, transportation of voters to the polls, voter registration activity, partisan political activity, or lobbying the congress;
10. that it will coordinate its activities with emergency Energy Crisis programs operated in the community pursuant to the Low-Income Home Energy Assistance Program;
11. that it will ensure that financial management systems utilize the standards prescribed in the "Vermont CSBG Uniform Requirements for Grants and Agreements with Non-profit Organizations".
12. that it will ensure the cooperation of staff and availability of all records, pertaining to the CSBG, to representatives of the State Office of Economic Opportunity, the office of the State Auditor and Federal officials charged with monitoring the use of the funds provided;
13. that it will cooperate with Federal investigations undertaken in accordance with Section 679 of the Act;
14. that it will comply with the nondiscrimination provisions in Section 677 of the Act;
15. that it has adopted and implemented bylaws for itself and sub-grantee policies relative to travel, personnel and other areas as appropriate, consistent with Federal and State laws and regulations. The reimbursement rates for travel and related expenses will be set locally by the boards but may not exceed the State limits. Fiscal management policies and procedures must have been approved and be located in separate volume.

Signature, Executive Director _____

Date _____

Print Name _____

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APPENDIX 1: CSBG DEFINITIONS AND CONDITIONS

A. General Conditions

Only those persons who meet the criterion of eligibility established under Section 673 (2) of the CSBG Act – that is, whose income does not exceed the percentage authorized by Congress of the official poverty line established by the Secretary of Health and Human Services – shall be the recipients of services provided with funds under this grant.

B. Eligibility

Determining Client Eligibility for the Community Services Block Grant (CSBG)

Federal CSBG statute establishes **client income eligibility at the level authorized by Congress of the federal poverty guidelines (historically 200% or 125%)**, giving states the option to set this figure lower if it serves the objectives of the block grant.

1. General: Vermont's Community Action Agencies will use the level authorized by Congress of the federal poverty guidelines (historically 200% or 125%) of Federal Poverty Guidelines as the standard for determining CSBG income eligibility. This will be calculated based on a household's gross income in the past 30 days, excluding tax refunds.

2. Re-Certification: In each new federal fiscal year, Community Action Agencies shall re-certify that new or returning CSBG households are income eligible and reside in the service territory.

3. Direct Assistance: **A household receiving CSBG direct assistance dollars (such as a rental payment to prevent eviction, or a grant to open a small business) must be income eligible at the time of assistance.** Their file must contain appropriate documentation (see item 4). Failure to document eligibility in connection with financial assistance may result in the program operator having to repay funds. Direct assistance is always to a third-party vendor, such as a landlord or utility. Under no circumstances shall a payment go directly to a client household.

4. Documentation: Acceptable forms of documentation include: current pay stubs, bank statements or tax documents; or a printout from the state's Access system showing financial benefits received. If none of the above are available and it is reasonable to assume the household is income eligible, the Community Action Agency may use a written certification, signed by the client and community action staff, showing the household's income in the past thirty days.

5. Tax Refunds Not Counted as Income: The "Tax Relief, Unemployment Insurance Reauthorization, and Job Creation Act of 2010, signed into law on December 17th, 2010, includes a provision that disregards tax refunds as income or resources in programs funded in

whole or in part with Federal funds. The total amount of a refund received after December 31, 2009 – regardless of whether the refund is the result of a refundable credit, over-withholding, or both – is disregarded as income and resources. The law is not retroactive, but applies as of the date of enactment.

6. Programs Funded in Part by CSBG: **Where a program is partially funded by CSBG, a proportional share of clients served by the program must meet CSBG eligibility guidelines.**

7. Asset Development and Self-Sufficiency: Asset-development programs funded in whole or in part by CSBG and designed to span more than one fiscal year may continue to provide programming to a client or household whose income increases above the poverty guidelines, so long as the household met all eligibility guidelines at the time of program entry. This applies to non direct-assistance programs where the focus is supporting a household's transition out of poverty. In keeping with item 3, no household is eligible for CSBG direct assistance if current household income exceeds federal poverty guidelines.

8. Self-Employment: Where a member of the household is self-employed, gross revenues clearly tied to a business, and offset by the legitimate operating expenses of that business, shall not be considered household income. However, any personal income earned through self-employment shall be considered part of household income.

C. Special Conditions

1. Funds budgeted as "Director's Special Discretionary Fund" are provided for emergency purposes, for the Executive Director to assist low-income persons to obtain emergency assistance through loans or grants to meet immediate and urgent individual and family needs, as provided under Section 675 (c) (1) (B) (iii) of the Community Services Block Grant Act.
2. Title for all non-expendable personal property (unit acquisition cost of \$5,000 or more and having a useful life exceeding one year or more) and non-expendable property with a cost of \$5,000 or more, vests in the State. The purchase of all non-expendable personal property shall require the prior approval of the State; the completion and the submittal of a CSBG Property Record Card is required within 30 days after delivery; and the inclusion of the item(s) in the Grantee's CSBG Fixed Assets Account.
3. Adequate documentation verifying client eligibility must be maintained by the Grantee.
4. The complete minutes from all Grantee's board meetings shall be transmitted to the State within 30 days of the board meeting.

Vermont CSBG Plan Addendum, FY 2025

STATE MONITORING OF PROGRAM

Consistent with the federal requirements in section 678B of the CSBG statute, The State of Vermont conducts monitoring of all CSBG Eligible Entities to determine whether eligible entities are meeting the performance goals, administrative standards, financial management requirements, and other requirements of the State.

Onsite Monitoring: The State Office of Economic Opportunity and The Agency of Human Services Audit Unit conduct the following reviews of all eligible entities:

- A full onsite review of each eligible entity at least once during each 3-year period. This onsite monitoring incorporates interviews with the Community Action Agency management, staff and board, review of back-up documentation, site inspection, review of client files, policies and procedures. The process utilizes the State of Vermont's CSBG Monitoring tool which contains 130 items dealing with Program Compliance, Board Governance, ROMA implementation and data quality, and Administrative Operations. The Agency of Human Services Audit Unit uses its financial monitoring tool which focuses on Fiscal Controls and Financial Procedures. Beginning in FY16, the organizational standards have been incorporated into the onsite review of each eligible entity.
- An onsite review of each newly designated entity immediately after the completion of the first year in which the entity receives funds through the community services block grant program.
- Follow-up reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards, and requirements established by the State. The State Office of Economic Opportunity uses a risk-assessment procedure to determine if follow-up monitoring is indicated, and whether the next full monitoring visit is required in one, two or three years.
- Other reviews as appropriate, including reviews of entities with programs that have had other Federal, State, or local grants terminated for cause.
- All onsite reviews include an exit interview and an initial monitoring report to eligible entities within 45 days.
- Additionally, the State Office of Economic Opportunity conducts off-site (desk monitoring) reviews of all eligible entities throughout the program year. This consists primarily of a review of financial and programmatic reports from eligible entities.

I. Reporting Requirements

a. Programmatic

- 1) Each Vermont Community Action Agency, in conjunction with the State Office of Economic Opportunity, has developed a client information system to collect and track data on programs operated, clients served, and outcomes achieved. Community Action Agencies will use the information systems to generate a demographic profile of clients served and the types of services provided. Summary reports on the number of, and characteristics of, clients served will be submitted to the State Office of Economic Opportunity on a quarterly basis, defined in the individual grant agreements with the local sub-grantees.
- 2) Programmatic reports, consisting of the agency's National Performance Indicator data, detailing the progress the Community Action Agency has made towards each of the Three National Goals, and a CSBG narrative in the format proscribed by the National Association for State Community Service Programs (NASCS), will be submitted by each Community Action Agency to the State Office of Economic Opportunity quarterly.

b. Financial

- 1) The State Office of Economic Opportunity has developed a financial report – Invoice/Financial Statement – which is designed to facilitate the reporting of financial data on a monthly and cumulative basis. This report form was designed to afford the State and the sub-grantees the capability to carefully monitor expenditures by comparing actual to projected expenditures as presented on the Monthly Expenditure Plan.

2. Utilization of Required Reports

Report forms have been designed to consolidate financial and programmatic information and to incorporate expenditure and service goals established by, and presented in, the grant agreements entered into between the State Office of Economic Opportunity and sub-grantees. This format presents a ready means of assessing grantee performance and further affords the capability of off-site financial monitoring which can identify individual sub-grantee(s) or specific sub-grantee expense accounts which should be subjected to on-site monitoring.

3. Regulations

The State Office of Economic Opportunity will develop no regulations or policies beyond those absolutely necessary to operate successfully with necessary program and fiscal accountability. Whenever possible, in addition to basic requirements contained in grant agreements between

the State Office of Economic Opportunity and the sub-grantee, policies will be issued in the form of numbered policy memoranda to all sub-grantees on an "as needed" basis with a timely effective date. The provisions of such memoranda will be binding for CSBG sub-grantees.

4. Audit Requirements

Any funds made available to the sub-grantees by the State Office of Economic Opportunity from the CSBG will be audited on an annual basis in accordance with the standards for Audit of Governmental Organizations, programs, Activities, and Functions, and Guidelines for Financial and Compliance Audits of Federally Assisted programs, and the OMB Uniform Guidance.

5. State Responsibilities and Services

The State Office of Economic Opportunity is accountable to the Governor, Agency of Human Services Secretary, State Legislature, U.S. Department of Health and Human Services and the Congress for all aspects of grant management and program operation. Therefore, it will closely monitor program and fiscal management activities of its sub-grantees to ensure that services are being provided in an effective and efficient manner and that goals are being achieved.

Effective technical assistance and on-site monitoring can be accomplished through careful review and in-depth evaluation of fiscal and programmatic reports. Such analyses will identify any variance in planned progress toward the attainment of defined goals and will enable the State Office of Economic Opportunity to provide assistance or initiate the necessary action as necessary to remedy the situation. The Office of Economic Opportunity will provide a wide range of technical assistance to the sub-grantees to assist them in provision of services to clients.

Additionally, all eligible entities will receive on-site visits by Office of Economic Opportunity staff in order to conduct formal reviews of the sub-grantee's accounting system and procedures, personnel and travel policies, management systems and program activities in order to assure programmatic and management accountability.

Written reports detailing monitoring findings - both positive and negative - will be submitted to the Director of the Office of Economic Opportunity. The Director will, where appropriate and necessary, initiate corrective action measures detailing the specific steps that must be taken in order to achieve compliance with defined goals and standards. Such corrective measures will be communicated to the Executive Director of the particular agency, who will be responsible for implementing the required action.

As appropriate, monitoring may also result in technical assistance plans negotiated between the eligible entity and the State Office. The existence of a technical assistance plan does not constitute a deficiency, finding or corrective action. Technical assistance may be offered with or without the existence of a deficiency.

USE, SUSPENSION OR TERMINATION OF FUNDS

All Vermont CSBG eligible entities are Community Action Agencies which received funding under the Act in the previous fiscal year. Only current CSBG eligible entities are recipients of the FY24 Request for Work Plan grant package, and all funds provided (except for State administration and the Discretionary pool) for the CSBG and beyond will be obligated to these entities according to the 90 percent statutory rule. It is the State's intention to continue funding these agencies, provided that they meet the intent and requirements of the Act, grant obligations to the State, and comply with State and Federal laws and regulations, and Uniform Administrative Requirements prescribed by OMB.

The State will give special consideration to the designation of eligible entities to any community action agency which is receiving funds under any Federal anti-poverty program on the date of the enactment of the Act, except that (A) the State shall, before giving such special consideration, determine that the agency involved meets program and fiscal requirements established by the State; and (B) if there is no such agency because of any change in the assistance furnished to programs for economically disadvantaged persons, the State shall give special consideration in the designation of community action agencies to any successor agency which is operated in substantially the same manner as the predecessor agency which did receive funds in the fiscal year preceding the fiscal year for which the determination is made.

I. Use of Funds

Funds given to grantees pursuant to this plan must be used in furtherance of the goals and objectives set forth in the State Plan and will be governed by a grant agreement between the State Office of Economic Opportunity and the sub-grantee as well as this plan and applicable law. The grant agreement shall be based on the sub-grantee's application for funding as approved. The Office of Economic Opportunity may condition the sub-grantee's receipt of the block grant funds on such terms as the State deems appropriate, provided the terms are consistent with and in furtherance of this plan and the Federal law governing CSBG.

A cash advance in an amount sufficient to fund one month's operation shall be made to each agency upon the effective date of the grant executed with the State Office of Economic Opportunity.

Subsequent transmittals of cash shall be made in monthly payments, which may contain a blend of reimbursement and advance. In the event that a continuing resolution or similar action should delay the determination of the State's CSBG allocation, or temporarily restrict spending authority, the State Office of Economic Opportunity, may, at its discretion restrict payments to reimbursement of actual eligible costs up to a level specified in the Community Action Agency's approved monthly expenditure plan.

In the event that the State elects to recapture and redistribute funds to an eligible entity through the entity's base grant made under Section 675C(a)(1) when un-obligated funds exceed 20 percent of the amount so distributed to such eligible entity for such fiscal year, the State will redistribute recaptured funds to another eligible entity, or require the original recipient of the funds to redistribute the funds to a private, nonprofit organization, located within the community served by the original recipient of the funds, for activities consistent with the purposes of the community services block grant program. [675C(a)(3)]

2. Local Sub-grantee Administration Costs

While there is no limitation on administrative expenditures at the local level imposed by the Act, such limitations may be imposed by applicable management circular of the Federal Office of Management and Budget. However, the State Office of Economic Opportunity expects agencies to establish reasonable levels of administrative cost.

Reasonable administrative costs will be determined through the process of grant negotiations, and expenditures will consequently be governed by the levels established by the grant.

3. Suspension or Termination of Funds

Per Section 676(b)(8) of the CSBG Act, no eligible entity in the State that received funding in the previous fiscal year through a community services block grant made under this subtitle will have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b).

The State Office of Economic Opportunity may suspend funding to a sub-grantee if the agency fails to submit accurate reports on the dates the reports are required. Funding may also be suspended if monitoring reports or independent audit reports indicate substantial noncompliance with Federal legislation, program regulations, established State policy, grant requirements, generally accepted accounting procedures or fiscal control procedures.

For purposes of making a determination with respect to a termination, the term 'cause' includes the material failure of an eligible entity to comply with the terms of its agreement and community action plan to provide services under this subtitle.

If the State determines that for some substantiated reason that a Community Action Agency is not meeting its grantee obligation, the State will notify the agency in writing of its determination and utilize the thirty day cancellation clause. This written notice will be the last resort after all reasonable attempts have been made to resolve and rectify the noncompliance.

The Community Action Agency has the right to appeal the cancellation of its CSBG grant agreement or failure to receive a new grant to the Vermont Agency of Human Services "Human Services Board" as described in Vermont Statutes Annotated, Title 3, Section 3090 and 3091. This provides for proper notice, the conducting of hearings and an appeal process.

The final termination of CSBG funds is subject to review by the Secretary as provided in the CSBG Act.

Additionally, the State assures that it will meet the requirements of Section 678(C)(a) of the Act, including:

- (a) inform the entity of the deficiency to be corrected;
- (b) require the entity to correct the deficiency;
- (c) offer training and technical assistance as appropriate to help correct the deficiency, and submit to the Secretary a report describing the training and technical assistance offered or stating the reasons for determining that training and technical assistance are not appropriate;
- (d) at the discretion of the State, offer the eligible entity an opportunity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan and to either approve the proposed plan or specify reasons why the proposed plan cannot be approved.
- (e) after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding to the eligible entity unless the entity corrects the deficiency.

PUBLIC PARTICIPATION

The State supports maximum feasible participation of all interested persons and groups in the development and implementation of CSBG programs at the state and local level, in an advisory

capacity. Therefore, it expects local agencies to continue meaningful participation of the public, private and low-income sectors in the planning and operation of programs under the CSBG.

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CSBG BUDGET SUMMARY

<u>Allocation of Funds by Community Action Agency</u>	FFY '22	FFY '23	FFY '24	FFY '25
	(Actual)	(Actual)	(Projected)	(Projected)
BROC – Community Action in Southwestern Vermont	\$631,006	\$644,630	\$644,630	\$644,630
Capstone Community Action, Inc.	\$674,754	\$689,322	\$689,322	\$689,322
Champlain Valley Office of Economic Opportunity, Inc.	\$1,038,870	\$1,061,299	\$1,061,299	\$1,061,299
Northeast Kingdom Community Action, Inc.	\$648,541	\$662,544	\$662,544	\$662,544
Southeastern Vermont Community Action	<u>\$550,053</u>	<u>\$561,929</u>	<u>\$561,929</u>	<u>\$561,929</u>
Community Action Agency Total ¹	\$3,543,224	\$3,619,724	\$3,619,724	\$3,619,724
State Administration	\$196,845	\$201,095	\$201,095	\$201,095
Discretionary Grants	\$196,846	\$201,096	\$201,096	\$201,096
Total Federal Funds	\$3,936,915	\$4,021,915	\$4,021,915	\$4,021,915
FFY 2022	\$3,936,915			
FFY 2023		\$4,021,915		
FFY 2024			\$4,021,915	
FFY 2025				\$4,021,915

¹ Base Awards Only