

CSBG State Plan

Program Name: Community Services Block Grant

Grantee Name: STATE OF MT DEPT HEALTH AND HUMAN SERVICES

Report Name: CSBG State Plan Revision # 1

Report Period: 10/01/2025 to 09/30/2026


Report Status: Submission Accepted by CO (Revision #1)

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CSBG Cover Page (SF-424M)

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration for Children and Families Community Services Block Grant (CSBG)		Form Approved OMB No: 0970-0382 Expires: 08/31/2027	
COVER PAGE			
* 1.a. Type of Submission: <input type="radio"/> Application <input checked="" type="radio"/> Plan <input type="radio"/> Other (2 Year)	* 1.b. Frequency: <input type="radio"/> Annual <input checked="" type="radio"/> Other (2 Year)	* 1.c. Consolidated Application/Plan/Funding Request? Explanation: 2. Date Received: 3. Applicant Identifier: 4a. Federal Entity Identifier: 4b. Federal Award Identifier:	* 1.d. Version: <input checked="" type="radio"/> Initial <input type="radio"/> Resubmission <input type="radio"/> Revision <input type="radio"/> Update State Use Only: 5. Date Received By State: 6. State Application Identifier:
7. APPLICANT INFORMATION			
* a. Legal Name: STATE OF MT DEPT HEALTH AND HUMAN SERVICES			
* b. Employer/Taxpayer Identification Number (EIN/TIN): 1810302402B2		* c. Organizational UEI: TR3DAXR9MCN8	
* d. Address:			
* Street 1:	INTERGOVERNMENTAL HUMAN SERVICES BUREAU	Street 2:	P.O. BOX 202956
* City:	HELENA	County:	
* State:	MT	Province:	
* Country:	United States	* Zip / Postal Code:	59620 - 2956
e. Organizational Unit:			
Department Name:		Division Name:	
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix:	* First Name: Julianna	Middle Name:	* Last Name: Campbell
Suffix:	Title: Community Services Specialist	Organizational Affiliation:	
* Telephone Number: (406) 444-7067	Fax Number:	* Email: julianna.campbell@mt.gov	
* 8a. TYPE OF APPLICANT: A: State Government			
b. Additional Description:			
* 9. Name of Federal Agency: Administration for Children and Families, Office of Community Services			
	Catalog of Federal Domestic Assistance Number:	CFDA Title:	
10. CFDA Numbers and Titles	93569	Community Services Block Grant	
11. Descriptive Title of Applicant's Project			
12. Areas Affected by Funding:			
13. CONGRESSIONAL DISTRICTS OF:			
* a. Applicant MT		b. Program/Project:	
Attach an additional list of Program/Project Congressional Districts if needed.			
14. FUNDING PERIOD:		15. ESTIMATED FUNDING:	
a. Start Date: 10/01/2025	b. End Date: 09/30/2026	* a. Federal (\$): \$0	b. Match (\$): \$0
* 16. IS SUBMISSION SUBJECT TO REVIEW BY STATE UNDER EXECUTIVE ORDER 12372 PROCESS?			
a. This submission was made available to the State under the Executive Order 12372			
Process for Review on :			

b. Program is subject to E.O. 12372 but has not been selected by State for review.	
c. Program is not covered by E.O. 12372.	
* 17. Is The Applicant Delinquent On Any Federal Debt? <input type="radio"/> YES <input checked="" type="radio"/> NO	
Explanation:	
18. By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001) **I Agree <input checked="" type="checkbox"/>	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
18a. Typed or Printed Name and Title of Authorized Certifying Official Julianna Campbell	18c. Telephone (area code, number and extension) 18d. Email Address julianna.campbell@mt.gov
18b. Signature of Authorized Certifying Official 	18e. Date Report Submitted (Month, Day, Year) 09/11/2025
Attach supporting documents as specified in agency instructions.	

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

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration for Children and Families Community Services Block Grant (CSBG)		Form Approved OMB No:0970-0382 Expires:08/31/2027	
SECTION 1 CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter			
1.1. Identify whether this is a One-Year or a Two-Year Plan		<input type="radio"/> one-year <input checked="" type="radio"/> two-year	
1.1a. Provide the federal fiscal years this plan covers:		Year One 2026	Year Two 2027
1.2. Lead Agency and Authorized Official: Update the following information in relation to the lead agency and authorized official designated to administer CSBG in the state, as required by Section 676(a) of the CSBG Act. <i>Information should reflect the responses provided in the Application for Federal Assistance, SF-424M.</i>			
Has information regarding the state lead agency and authorized official changed since the last submission of the State Plan? <input checked="" type="radio"/> Yes <input type="radio"/> No			
If yes, select the fields that have been changed [Check all that apply]			
<input type="checkbox"/>	Lead Agency	<input type="checkbox"/>	Department Type
<input type="checkbox"/>		<input type="checkbox"/>	Department Name
<input checked="" type="checkbox"/>	Authorized Official	<input type="checkbox"/>	Street Address
<input type="checkbox"/>		<input type="checkbox"/>	City
<input type="checkbox"/>	Zip Code	<input checked="" type="checkbox"/>	Office Number
<input type="checkbox"/>		<input type="checkbox"/>	Fax Number
<input checked="" type="checkbox"/>	Email Address	<input type="checkbox"/>	Website
1.2a. Lead agency		Montana Department of Public Health and Human Services	
1.2b. Cabinet or administrative department of this lead agency [Check one and provide a narrative where applicable]			
<input type="radio"/> Community Affairs Department			
<input type="radio"/> Community Services Department			
<input type="radio"/> Governors Office			
<input type="radio"/> Health Department			
<input type="radio"/> Housing Department			
<input checked="" type="radio"/> Human Services Department			
<input type="radio"/> Social Services Department			
<input type="radio"/> Other, describe			
1.2c. Cabinet or Administrative Department Name: Provide the name of the cabinet or administrative department of the CSBG authorized official		Human and Community Services Division	
1.2d. Authorized Official of the Lead Agency			
Name: Chappell Smith		Title: Division Administrator	
1.2e. Street Address		PO Box 202925	
1.2f. City		Helena	1.2g. State MT
		1.2h. Zip 59620	
1.2i. Telephone number 406 444 - 7067 ext.		1.2j. Fax number 406 444 - 2547	
1.2k. Email address chappell.smith@mt.gov		1.2l. Lead agency website https://dphhs.mt.gov/	
1.3. Designation Letter: Attach the state's official CSBG designation letter. A new designation letter is required if the chief executive officer of the state and/or the designated agency has changed.			
1.4. CSBG Point of Contact: provide the following information in relation to the designated state CSBG point of contact. The state CSBG point of contact should be the person that will be the main point of contact for CSBG within the state.			
Has Information regarding to the state point of contact has changed since the last submission of the State Plan? <input type="radio"/> Yes <input checked="" type="radio"/> No			

If yes, select the fields that have changed [check all the apply]			
<input type="checkbox"/>	Agency Name	<input type="checkbox"/>	Point of Contact
<input type="checkbox"/>	City	<input type="checkbox"/>	Zip Code
<input type="checkbox"/>	Fax Number	<input type="checkbox"/>	Email Address
<input type="checkbox"/>		<input type="checkbox"/>	Website
1.4a. Agency Name Intergovernmental Human Services Bureau			
1.4b Point of Contact Name			
Name: Sara Loewen		Title: Bureau Chief	
1.4c. Street Address		PO Box 202925	
1.4d. City		Helena	1.4e. StateMT
			1.4f. Zip 59620
1.4g. Telephone Number 406 447 - 4265 ext.		1.4h. Fax Number 406 447 - 4287	
1.4i. Email Address SLoewen@mt.gov		1.4j. Agency Website http://dphhs.mt.gov/	
1.5. Provide the following information in relation to the State Community Action Association.			
There is currently a state Community Action Association within the state. <input checked="" type="radio"/> Yes <input type="radio"/> No			
Has Information regarding the state Community Action Association has changed since the last submission of the State Plan? <input type="radio"/> Yes <input checked="" type="radio"/> No			
If yes, select the fields that have been changed [Check all the apply]			
<input type="checkbox"/>	Agency Name	<input type="checkbox"/>	Executive Director
<input type="checkbox"/>	City	<input type="checkbox"/>	State
<input type="checkbox"/>	Office Number	<input type="checkbox"/>	Fax Number
<input type="checkbox"/>		<input type="checkbox"/>	Email Address
<input type="checkbox"/>	Website	<input type="checkbox"/>	RPIC Lead
1.5a. Agency Name Montana Community Action Network			
1.5b. Executive Director or Point of Contact			
Name: Katie McLain		Title: Executive Director	
1.5c. Street Address		321 E. Main Street Suite 417e	
1.5d. City		Bozeman	1.5e. StateMT
			1.5f. Zip 59715
1.5g. Telephone number 406 223 - 0112 ext.		1.5h. Fax number 406 223 - 0112	
1.5i. Email Address katiemclain@gmail.com		1.5j. State Association Website www.montanacommunityaction.org	
1.5k. State Association currently serves as the Regional Performance Innovation Consortia (RPIC) lead <input type="radio"/> Yes <input checked="" type="radio"/> No			

Section 2: State Legislation and Regulation

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

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SECTION 2 State Legislation and Regulation

2.1. CSBG State Legislation:

State has a statute authorizing CSBG ☒ Yes ☐ No

2.2. CSBG State Regulation:

State has regulations for CSBG ☒ Yes ☐ No

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

Montana Code Annotated (MCA) - https://leg.mt.gov/bills/mca/title_0530/chapter_0100/part_0050/sections_index.html Administrative Rules of Montana (ARM) for the Community Services Block Grant Program - <https://rules.mt.gov/browse/collections/aec52c46-128e-4279-9068-8af5d5432d74/sections/f096bd09-f904-4680-bb13-c7f62ea398c2>

2.4. State Authority:

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

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

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

Section 3: State Plan Development and Statewide Goals

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SECTION 3

State Plan Development and Statewide Goals

3.1. CSBG Lead Agency Mission and Responsibilities:

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

Montana Department of Public Health and Human Services mission: To improve and protect the health, wellbeing, and self-reliance of all Montanans. Goals: 1) All Montana children are healthy, safe and in permanent, loving homes. 2) All Montanans have the tools and support to be as self-sufficient as possible. 3) All Montanans are injury-free, healthy and have access to quality healthcare. 4) All Montanans can contribute to the above through community service. Human and Community Services Division (HCSD): The mission of the HCSD of the Montana Department of Public Health and Human Services is to support the strengths of families and communities by promoting employment and providing the assistance necessary to help families and individuals meet basic needs and work their way out of poverty.

3.2. State Plan Goals:

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

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

1. Effective Agencies a. Goal: Enhance agency understanding of CSBG regulations i. Organize an annual in-person CSBG convening ii. Host quarterly virtual CSBG training sessions iii. Collaborate with DPHHS IT to offer AI and cybersecurity training iv. Identify additional training needs and provide resources to address them b. Goal: Aid in the integration of ROMA within CAAs i. Offer scholarships to CAAs to offset the training costs to become ROMA trainers and implementers ii. Allocate discretionary funds for ROMA-related activities iii. Develop a ROMA cohort for ongoing learning and collaboration iv. Pursue initiatives that strengthen ROMA implementation for CAAs c. Goal: Support State Association capacity and visibility as a proactive force in supporting statewide efforts to promote self-sufficiency for low-income individuals i. Provide discretionary funding to the Association ii. Partner to offer Training and Technical Assistance (TTA) iii. Foster ongoing collaboration through regular communication 2. State Office a. Goal: Integrate ROMA in state processes i. Allocate discretionary funds for ROMA-related training and activities ii. Support one ROMA trainer and one ROMA advocate within the state office iii. Develop a state office Theory of Change and a strategic plan 3. Data Systems a. Goal: Support the development of a new statewide database that meets the needs of the state and CAAs i. Allocate discretionary funds for IT and data system development ii. Identify and address training and technical assistance needs, facilitate a user group, and integrate with other systems iii. Stay updated on federal data requirements and explore new training methods.

3.3. State Plan Development:

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

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



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



U.S. Census data



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



Monitoring Visits/Assessments



Tools Not Identified Above (specify)

Eligible entity progress reports required by the State grantee.

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



Eligible Entity Community Needs Assessments



Eligible Entity Community Action Plans



Public Hearings/Workshops



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

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



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



State Association



National Association for State Community Services Programs (NASCSPP)



Community Action Partnership (NCAP)



Community Action Program Legal Services (CAPLAW)



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



Regional Performance Innovation Consortium (RPIC)



Association for Nationally Certified ROMA Trainers (ANCRT)

<input type="checkbox"/> Federal CSBG Office				
<input type="checkbox"/> Organizations not identified above [Specify]				
3.4. Eligible Entity Involvement				
3.4a. State Plan Development Describe the specific steps the State took in developing the State Plan to involve the eligible entities.				
<i>(Note: This information is associated with State Accountability Measures 1Sa(ii) and may pre-populate the State's annual report form)</i>				
<p>State staff reviews its implementation of CSBG and considers the needs of its network through information collected from monitoring visits, meetings, and collaborations. The state initiated arrangements for the plans development in March. Beginning in June, the state plan development process became part of the regular, bi-monthly check-in meetings with the directors of the eligible entities and state association. During the early meetings, the process and timeline of the state plan submission was discussed. Two state plan focus groups were held during those meetings, one in July and one in August. In July, a guided discussion and brainstorming activity was hosted via Zoom to generate state plan goal ideas and identify priority areas for training and technical assistance and monitoring processes. In early August, the state hosted a webinar to present the finalized state plan objectives and goals, review the allocation processes and discuss changes in funding that resulted from changes in population data, and discuss the ACSI results and State targets for improvement. The state was open to feedback and comment during this meeting. Eligible entities were invited to further review the state plan, attend the public hearing on August 20th, and provide further comments. Eligible entity planning documents are also considered. Eligible entities are required to turn in a progress report during the two-year plan cycle, a current board membership list, a statement of assurances and supplemental narrative, a prospective budget for the upcoming two years, a ROMA focused work plan, and their most current community needs assessment.</p>				
3.4b. Performance Management Adjustment: Describe how the state adjusted its State Plan development procedures under this State Plan, as compared to previous State Plans, in order to:				
1) encourage eligible entity participation and 2) ensure the State Plan reflects input from eligible entities?				
Any adjustment should be based on the State's analysis of past performance in these areas, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any adjustments, provide further detail.				
<i>(Note: This information is associated with State Accountability Measures 1Sb(i) and (ii) and pre-populate the Annual Report, Module 1, Item B.1.)</i>				
<p>The State adjusted the early development of the state plan by integrating eligible entity executive directors earlier in the planning process to better coordinate state plan goals, review the allocation processes and discuss changes in funding that resulted from changes in the population data, and discuss both the ACSI results and State targets for improvement. The State made these changes to the development procedures of the State Plan because the 2025 ACSI results showed a 12-point decrease from 63 to 51 from previous results. The target is to increase the performance goal by involving the eligible entity directors with goal generation and early planning, as well as providing progress reports during the state plan period.</p>				
3.5. Eligible Entity Overall Satisfaction:				
Provide the State's target for eligible entity Overall Satisfaction during the performance period:				
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 5px;">Year One</td> <td style="width: 50%; padding: 5px;">73</td> </tr> <tr> <td style="width: 50%; padding: 5px;">Year Two</td> <td style="width: 50%; padding: 5px;">75</td> </tr> </table>	Year One	73	Year Two	75
Year One	73			
Year Two	75			
Instructional Note: The state's target score will indicate improvement or maintenance of the state's Overall Satisfaction score from the most recent American Customer Survey Index (ACSI) survey of the state's eligible entities. <i>(Note: Item 3.5 is associated with State Accountability Measure 8S and may pre-populate the State's annual report form)</i>				

Section 4: CSBG Hearing Requirements

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SECTION 4 CSBG Hearing Requirements

4.1. Public Inspection:

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

The public hearing was scheduled to take place on August 20th, 2025. The State Plan was made available to the public fourteen (14) days prior to the public hearing. The public could request a copy of the draft state plan through written request or by calling the state office. Notice of the public hearing was published in the State's major newspapers beginning August 6th, 2025 and running on consecutive days until August 20th, 2025. It was also posted online through the states eCalendar website and the DPHHS Public Notice webpage on July 29th in advance of the 14 day public notice period. Hard copies of the plan were available upon request and emailed to eligible entities. The plan was also reviewed in detail with eligible entities just prior to the public hearing on August 14th. Individuals had fourteen (14) days from the start of the public notice period of August 6th to submit comment which they could do by writing to the state office at the address listed in the public notice. Individuals could also submit a verbal public comment during the public hearing or submit a written comment via email after the hearing but before 5pm on August 20th.

4.2. Public Notice/Hearing:

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

Notice of the public hearing was published in the State's major newspapers on August 6th, and the ad ran as often as the newspaper was printed during that time on August 6, 7, 8, 10, 11, 12, 13, 14, 15, 17, 18, 19, and 20th. The notice was also posted on the Departments Public Notice website and eCalendar site on July 29th. A copy of the notice from one of the major newspapers is attached. The State CSBG office is committed to continuing its practice of conducting state plan hearings in advance of the formal CSBG State Plan Submission date.

4.3. Public and Legislative Hearings:

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

	Date	Location	Type of Hearing [Select an option]	If a combined hearing was held, confirm that the public was invited
1	01/13/2025	Helena, MT	Legislative	<input type="checkbox"/>
2	08/20/2025	Helena, MT Virtual	Public	<input type="checkbox"/>

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

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

Documentation for the public hearing is attached. State CSBG activities were included in the Human and Community Service's Division presentations to the Montana Legislature, Health and Human Services Joint Appropriations Sub Committee on 1/13/2025. Link to the recording: <https://sg001-harmony.sliq.net/00309/Harmony/en/PowerBrowser/PowerBrowserV2/20250117/-1/54974>

Section 5: CSBG Eligible Entities

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SECTION 5 CSBG Eligible Entities

5.1. CSBG Eligible Entities:

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

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

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

#	CSBG Eligible Entity	Geographical Area Served by county (Provide all counties)	Public or Nonprofit	Type of Entity [choose all that apply]
1	Action for Eastern Montana	Carter, Custer, Daniels, Dawson, Fallon, Garfield, McCone, Phillips, Powder River, Prairie, Richland, Roosevelt, Rosebud, Sheridan, Treasure, Valley, Wibaux	Non-Profit	Community Action Agency
2	District IV Human Resource Development Council	Hill, Liberty and Blaine	Non-Profit	Community Action Agency
3	Opportunities Incorporated	Cascade, Chouteau, Teton, Pondera, Toole and Glacier	Non-Profit	Community Action Agency
4	District 6 Human Resource Development Council	Fergus, Golden Valley, Judith Basin, Musselshell, Petroleum, and Wheatland	Non-Profit	Community Action Agency
5	District VII Human Resource Development Council	Big Horn, Carbon Stillwater, Sweet Grass and Yellowstone	Non-Profit	Community Action Agency
6	Rocky Mountain Development Council	Lewis and Clark, Broadwater and Jefferson	Non-Profit	Community Action Agency
7	District IX Human Resource Development Council	Gallatin, Park and Meagher	Non-Profit	Community Action Agency
8	Community Action Partnership of Northwest Montana	Flathead, Lake, Lincoln and Sanders	Non-Profit	Community Action Agency
9	District XI Human Resource Council	Mineral, Missoula, and Ravalli	Non-Profit	Community Action Agency
10	Action Incorporated	Beaverhead, Deer Lodge, Granite, Madison, Powell and Silver Bow	Non-Profit	Community Action Agency

5.2. Total number of CSBG eligible entities 10

5.3. Changes to Eligible Entities List:

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

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

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

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

CSBG Eligible Entity	Type	Start Date	Geographical Area Served	Delete

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

CSBG Eligible Entity	Reason	Delete

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

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

Section 6: Organizational Standards for Eligible Entities

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SECTION 6 Organizational Standards for Eligible Entities

Note: Reference IM 138, *State Establishment of Organizational Standards for CSBG Eligible Entities*, for more information on Organizational Standards. Click [HERE](#) for IM 138.

6.1. Choice of Standards: Confirm whether the state will implement the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138) or an alternative set during the federal fiscal year(s) of this planning period

☒ COE CSBG Organizational Standards ☐ Modified version of COE CSBG Organizational Standards ☐ Alternative set of Organizational Standards

6.1a. Modified Organizational Standards: In the case that the state is requesting to use modified COE-developed organizational standards, provide the proposed modification for the FFY of this planning period including the rationale.

N/A

6.1b. Alternative Organizational Standards: If using an alternative set of organizational standards, attach the complete list of alternative organizational standards.

6.1c. Alternative Organizational Standards Changes: If using an alternative set of organizational standards:

- 1) provide any changes from the last set provided during the previous State Plan submission;
- 2) describe the reasons for using alternative standards; and
- 3) describe how they are at least as rigorous as the COE-developed standards

☒ There were no changes from the previous State Plan submission

Provide reason for using alternative standards

N/A

Describe rigor compared to COE-developed Standards

N/A

6.2. Implementation: Check the box that best describes how the state officially adopt(ed) organizational standards for eligible entities in the state in a manner consistent with the state's administrative procedures act. If "Other" is selected, provide a timeline and additional information, as necessary. *[Check all that apply and narrative where applicable]*

☐ Regulation

☐ Policy

☒ Contracts with eligible entities

☐ Other, describe:

6.3. Organizational Standards Assessment: Describe how the state assess eligible entities against organizational standards this federal fiscal year(s). *[Check all that apply.]*

☐ Peer-to-peer review (*with validation by the State or state-authorized third party*)

☒ Self-assessment (*with validation by the State or state-authorized third party*)

☐ Self-assessment/peer review with state risk analysis

☐ State-authorized third party validation

☒ Regular, on-site CSBG monitoring

☐ Other

6.3a. Assessment Process: Describe the planned assessment process.

Monitors use a state-created monitoring tool which includes the Organizational Standards to assess eligible entities. Monitors request documentation for annual monitoring visits one month before the scheduled monitoring date. Files are reviewed, and then findings are discussed during the on-site monitoring visit exit interview so that agencies can start addressing any issues or missing items. Within 60 days of the monitoring activity, a summary letter report is sent to the eligible entity which outlines any findings and establishes a minimum benchmark for correcting them. The site is required to act on any findings within 45 days. Agencies are expected to respond with a corrective action plan or submit proof for items already corrected by that timeframe. A new self-assessment tool will be implemented which will allow eligible entities to rate their current implementation of the organizational standards against the assessment matrix developed by NCAP. This will help eligible entities begin to move beyond compliance and into excellence for the organizational standards. The self-assessment will be reviewed and verified by the state during regular monitoring visits to ensure compliance and identify further actions for training and assistance.

6.4. Eligible Entity Exemptions: Will the state make exceptions in applying the organizational standards for certain eligible entities due to special circumstances or organizational characteristics (as described in IM 138)? ☒ Yes ☐ No

6.4a. Provide the specific eligible entities the state will exempt from meeting organizational standards, and provide a description and a

justification for each exemption		
Total Number of Exempt Entities: 10		
CSBG Eligible Entity	Description / Justification	Delete
Action for Eastern Montana	The state of Montana is transitioning to a statewide community needs assessment, the results of which will be disseminated in late 2025. A blanket waiver was issued for organizational standard 3.1 so that the eligible entity was not required conduct their own local community needs assessment while the statewide assessment is being implemented.	
District 4 Human Resource Development Council	The state of Montana is transitioning to a statewide community needs assessment, the results of which will be disseminated by late 2025. A blanket waiver was issued for organizational standard 3.1 so that the eligible entity was not required conduct their own local community needs assessment while the statewide assessment is being implemented.	
Opportunities Incorporated	The state of Montana is transitioning to a statewide community needs assessment, the results of which will be disseminated by late 2025. A blanket waiver was issued for organizational standard 3.1 so that the eligible entity was not required conduct their own local community needs assessment while the statewide assessment is being implemented.	
District 6 Human Resource Development Council	The state of Montana is transitioning to a statewide community needs assessment, the results of which will be disseminated by late 2025. A blanket waiver was issued for organizational standard 3.1 so that the eligible entity was not required conduct their own local community needs assessment while the statewide assessment is being implemented.	
District 7 Human Resource Development Council	The state of Montana is transitioning to a statewide community needs assessment, the results of which will be disseminated by late 2025. A blanket waiver was issued for organizational standard 3.1 so that the eligible entity was not required conduct their own local community needs assessment while the statewide assessment is being implemented.	
Rocky Mountain Development Council	The state of Montana is transitioning to a statewide community needs assessment, the results of which will be disseminated by late 2025. A blanket waiver was issued for organizational standard 3.1 so that the eligible entity was not required conduct their own local community needs assessment while the statewide assessment is being implemented.	
District 9 Human Resources Development Council	The state of Montana is transitioning to a statewide community needs assessment, the results of which will be disseminated by late 2025. A blanket waiver was issued for organizational standard 3.1 so that the eligible entity was not required conduct their own local community needs assessment while the statewide assessment is being implemented.	
Community Action Partnership of Northwest Montana	The state of Montana is transitioning to a statewide community needs assessment, the results of which will be disseminated by late 2025. A blanket waiver was issued for organizational standard 3.1 so that the eligible entity was not required conduct their own local community needs assessment while the statewide assessment is being implemented.	
District XI Human Resource Council	The state of Montana is transitioning to a statewide community needs assessment, the results of which will be disseminated by late 2025. A blanket waiver was issued for organizational standard 3.1 so that the eligible entity was not required conduct their own local community needs assessment while the statewide assessment is being implemented.	
Action Incorporated	The state of Montana is transitioning to a statewide community needs assessment, the results of which will be disseminated by late 2025. A blanket waiver was issued for organizational standard 3.1 so that the eligible entity was not required conduct their own local community needs assessment while the statewide assessment is being implemented.	
6.5. Performance Target: Provide the percentage of eligible entities that the state expects to meet all the state-adopted organizational standards for FFY(S) for this planning period		
Year One	100%	Year Two100%
Note: Item 6.5 is associated with State Accountability Measures 6Sa and prepopulate the Annual report, Module 1, Table D.2.		

Section 7: State Use of Funds

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

Form Approved
OMB No: 0970-0382
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SECTION 7 State Use of Funds

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

7.1. Formula:

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

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

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

The annual allocation is based on the previous 5-year average of the Poverty population and the General Population numbers from the American Community Survey for the areas each agency serves. Each agency gets a base amount = \$50,000+(Agency Average of Poverty Population + General Population/2)*Total funds available for agency allocations (Restricted funds at 90%).

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

7.2. Planned Allocation:

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

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

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

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

CSBG Eligible Entity	Year One Funding Amount \$	Delete
Action for Eastern Montana	\$266,523	
District IV Human Resource Development Council	\$128,193	
Opportunities Incorporated	\$386,492	
District 6 Human Resource Development Council	\$108,940	
District VII Human Resource Development Council	\$554,539	
Rocky Mountain Development Council	\$270,917	
District IX Human Resource Development Council	\$381,011	
Community Action Partnership of Northwest Montana	\$514,204	
District XI Human Resource Council	\$466,548	
Action Incorporated	\$242,802	
Total	\$3,320,169	

CSBG Eligible Entity Year Two

CSBG Eligible Entity	Year Two Funding Amount \$	Delete
Action for Eastern Montana	\$266,523	
District IV Human Resource Development Council	\$128,193	
Opportunities Incorporated	\$386,492	
District 6 Human Resource Development Council	\$108,940	
District VII Human Resource Development Council	\$554,539	
Rocky Mountain Development Council	\$270,917	
District IX Human Resource Development Council	\$381,011	
Community Action Partnership of Northwest Montana	\$514,204	
District XI Human Resource Council	\$466,548	
Action Incorporated	\$242,802	

Total	\$3,320,169
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7.3. Distribution Process:
Describe the specific steps in the state's process for distributing 90 percent funds to the eligible entities and include the number of days each step is expected to take; include information about state legislative approval or other types of administrative approval (such as approval by a board or commission).

Each year, the State executes a contract with every eligible entity, which includes the award amount determined by the funding matrix. Contracts cover the period beginning October 1 and extend through the end of the grant cycle. The drafting process begins in September, following the submission of the State Plan. The States objective is to complete the contracting process as efficiently as possible while balancing two factors: (1) the timing and uncertainty of federal allocation releases, and (2) the multiple layers of approval required within the States administrative framework. The contract process involves several stages. It begins with the completion of a contract request form, updates to terms, and the collection of supporting documentation. The request then enters an approval phase, which requires multiple signatures from designated department leaders. After approval, a contract is drafted in the eMACS system, with an individual contract created for each agency. The draft contract undergoes multiple levels of review, beginning with the CSBG State Office and advancing to Department leadership. Once language is approved, the contract is sent to the agency for signature. Following the agency's signature, the contract is returned to DPHHS for the Directors signature. Upon the Directors approval, the contract becomes final and active. This process typically requires eight to ten weeks to complete. When funding is released, amendments are made to the contract to add the funds. Amendments go through the same approval process and take the same amount of time. Agencies are required to submit a work plan and budget. As quarterly allocations are received from HHS, contracts are amended following a similar process allowing eligible entities access to the updated funding. Agencies are required to update work plans and budgets accordingly. Funds are made available consistently through this process.

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

☒ Reimbursement

☐ Advance

☐ Hybrid

☐ Other

7.4. Distribution Timeframe:
Does the state plan to make funds available to eligible entities no later than 30 calendar days after OCS distributes the federal award? ☐ Yes ☒ No

7.4a. Distribution Consistency: If no, describe state procedures to ensure funds are made available to eligible entities consistently and without interruption.

Note: Item 7.4 is associated with State Accountability Measure 2Sa and may prepopulate the state's annual report form.

Every year, a contract is drawn between the State and each eligible entity that includes information about the award amount. The contract starts October 1 and continues through the end of the grant period. The goal is to complete the contracting process as soon as is reasonably possible. The contract completion process involves several approval steps and signature requirements. Agencies are required to submit a work plan and budget. As quarterly allocations are received from HHS, contracts are amended following a similar process allowing eligible entities access to the updated funding. The goal is to complete amendments as soon as is reasonably possible. The State evaluates its processes and takes measures to adjust them to increase efficiencies. Agencies are required to update work plans and budgets accordingly. Funds are made available consistently through this process.

7.5. Distribution of Funds Performance Management Adjustment:
Describe the state's strategy for improving grant and/or contract administration procedures under this State Plan as compared to past plans. Any improvements should be based on analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any improvements, provide further detail.

Note: This information is associated with State Accountability Measure 2Sb and may prepopulate the state's annual report form.

On the 2025 ACSI, "Distribution of Funds" was scored at 51, a 32-point fall from the 2021 ACSI where the state scored an 83. In order to improve contract administration, the state has moved to electronic distribution of contracts and electronic signatures, which allows us to speed up the process. The state has also streamlined staff responsibilities and created internal procedures surrounding contract administration. The state will implement more regular updates to the eligible entities throughout the contract process, so they are more embedded in the funding distribution process. The state will also provide detailed explanations of the allocation formula and provide more regular distributions of funds. We continue to refine this process to make it as efficient and effective as possible.

Administrative Funds [Section 675C(b)(2) of the CSBG Act]

Note: This information pre-populates the state's Annual Report, Module 1, Table E.4.

7.6. Allocated Funds: Specify the percentage of your CSBG planned allocation for administrative activities for the FFY(s) covered by this State plan.

Year One (0.00%)	5.00	Year Two (0.00%)	5.00
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7.7. State Staff: Provide the number of state staff positions to be funded in whole or in part with CSBG funds for the FFY(s) covered by this State Plan

Year One	6.00	Year Two	6.00
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7.8. State FTEs: Provide the number of state Full Time Equivalents (FTEs) to be funded with CSBG funds for the FFY(s) covered by this State Plan

Year One	1.00	Year Two	1.00
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7.9. Remainder/Discretionary Funds Use: Does the state have remainder/discretionary funds, as described in Section 675C(b)(1) of the CSBG Act? ☒ Yes ☐ No

If yes, provide the allocated percentage and describe the use of the remainder/discretionary funds in the table below.

Year One (0.00%)	5.00%	Year Two (0.00%)	5.00%
------------------	-------	------------------	-------

00%)		00%)	
Use of Remainder/Discretionary Funds(See Section 675C(b)(1) of the CSBG Act)			
<i>Note: This response will link to the corresponding assurance, Item 14.2.</i>			
<p><i>If a funded activity fits under more than one category in the table, allocate the funds among the categories. For example, if the state provides funds under a contract with the State Community Action association to provide training and technical assistance to eligible entities and to create a statewide data system, the funds for that contract should be allocated appropriately between Items 7.9a. - 7.9c. If allocation is not possible, the state may allocate the funds to the main category with which the activity is associated.</i></p>			
<p><i>Note: This information is associated with State Accountability Measures 3Sa and pre-populates the annual report Module 1, Table E.7.</i></p>			
Remainder/Discretionary Fund Uses		Year One Planned \$	Brief description of services/activities and/or activities
7.9a. Training/technical assistance to eligible entities		\$19,000.00	These planned services/activities will be described in State Plan Item 8.1.
7.9b. Coordination of state-operated programs and/or local programs		\$10,000.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9c. Statewide coordination and communication among eligible entities		\$30,000.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need		\$0.00	
7.9e. Asset-building programs		\$0.00	
7.9f. Innovative programs/activities by eligible entities or other neighborhood groups		\$30,554.00	Eligible entities special projects
7.9g. State charity tax credits		\$0.00	
7.9h. Other activities, specify in column 3		\$94,880.00	IT systems and enhancements
Total		\$184,434.00	
Remainder/Discretionary Fund Uses		Year Two Planned \$	Brief description of services/activities
7.9a. Training/technical assistance to eligible entities		\$19,000.00	These planned services/activities will be described in State Plan Item 8.1.
7.9b. Coordination of state-operated programs and/or local programs		\$10,000.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9c. Statewide coordination and communication among eligible entities		\$30,000.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need		\$0.00	
7.9e. Asset-building programs		0	
7.9f. Innovative programs/activities by eligible entities or other neighborhood groups		\$30,554.00	Eligible entities special projects.
7.9g. State charity tax credits		\$0.00	
7.9h. Other activities, specify in column 3		\$94,880.00	IT systems and enhancements
Total		\$184,434.00	
<p>7.10. Remainder/Discretionary Funds Partnerships: Select the types of organizations, if any, the State Plans to work with (by grant or contract using remainder/discretionary funds) to carry out some or all of the activities in table 7.9. <i>[Check all that apply and narrative where applicable]</i></p>			
<input type="checkbox"/> The state directly carries out all activities (No Partnerships)			
<input checked="" type="checkbox"/> The state partially carries out some activities			
<input checked="" type="checkbox"/> CSBG eligible entities (<i>if checked, include the expected number of CSBG eligible entities to receive funds</i>) 6			
<input checked="" type="checkbox"/> Other community-based organizations			
<input checked="" type="checkbox"/> State Community Action association			
<input type="checkbox"/> Regional CSBG technical assistance provider(s)			
<input checked="" type="checkbox"/> National technical assistance provider(s)			
<input checked="" type="checkbox"/> Individual consultant(s)			
<input type="checkbox"/> Tribes and Tribal Organizations			
<input type="checkbox"/> Other			

Note: <i>This response will link to the corresponding CSBG assurance, item 14.2.</i>
7.11. Use of Remainder/Discretionary Funds Performance Management Adjustment: Describe any adjustments the state will make to the use of remainder/discretionary funds under this State Plan as compared to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.
Note: <i>This information is associated with State Accountability Measures 3Sb, and may pre-populate the State's annual report form.</i>
Discretionary funds will be strategically allocated to strengthen statewide capacity and infrastructure in support of Community Services Block Grant (CSBG) objectives. Key areas of investment include: Montana State Association Supporting coordination and advocacy efforts across the state Montana Continuum of Care Enhancing collaboration among service providers addressing homelessness and housing stability IT Systems Development and Training Advancing technological infrastructure to improve data management and service delivery Additional funds will be directed toward training and technical assistance activities, including: Development of a Results-Oriented Management and Accountability (ROMA) cohort Facilitation of ROMA training events to build performance management capacity Establishment of an annual CSBG meeting to promote statewide learning, alignment, and innovation The state is also actively developing a new data system to improve CSBG reporting capabilities. This system will offer enhanced flexibility for data integration, utility, and analysis ultimately supporting more informed decision-making and outcome tracking. To ensure successful implementation and long-term sustainability, ongoing funding will be required for: System training for users and administrators Continuous enhancements based on evolving program needs Maintenance and utilization support to maximize system impact

Section 8: State Training and Technical Assistance

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

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SECTION 8

State Training and Technical Assistance

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

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

Training and Technical Assistance - Year One

	Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
1	All quarters	Both	Monitoring	
2	All quarters	Training	Technology	
3	Ongoing / Multiple Quarters	Both	ROMA	
4	Ongoing / Multiple Quarters	Technical Assistance	Other	State will provide T&TA on an as needed basis with each eligible entity on topics requested by the eligible entity
5	Ongoing / Multiple Quarters	Technical Assistance	Organizational Standards - General	
6	Ongoing / Multiple Quarters	Both	Organizational Standards for eligible entities with unmet TAPs and QIPs	
7	FY1-Q1	Training	Reporting	
8	FY1-Q2	Technical Assistance	Reporting	
9	FY1-Q4	Training	Other	Directors Training Topic of Choice which Changes each year
10	FY1-Q3	Both	Other	CSBG Annual Meeting

Training and Technical Assistance - Year Two

	Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
1	All quarters	Both	Monitoring	
2	All quarters	Training	Technology	
3	Ongoing / Multiple Quarters	Both	ROMA	
4	Ongoing / Multiple Quarters	Technical Assistance	Other	State will provide T&TA on an as needed basis with each eligible entity on topics requested by the eligible entity
5	Ongoing / Multiple Quarters	Technical Assistance	Organizational Standards - General	
6	Ongoing / Multiple Quarters	Both	Organizational Standards for eligible entities with unmet TAPs and QIPs	
7	FY2-Q1	Training	Reporting	
8	FY2-Q2	Technical Assistance	Reporting	
9	FY2-Q4	Training	Other	Directors Training Topic of Choice which changes each year
10	FY2-Q3	Both	Other	CSBG Annual Meeting

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

Year One	\$19,000	Year Two	\$19,000
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8.1b. Training and Technical Assistance Collaboration: Describe how the state will collaborate with the state association and other stakeholders in the planning and delivery of training and technical assistance.

The State maintains a strong and ongoing partnership with the Montana State Association and other key stakeholders to ensure the effective planning and delivery of training and technical assistance (T&TA) across the network of eligible entities. Collaboration is facilitated through regular participation in State Association/Directors meetings, where T&TA needs are identified, discussed, and prioritized. These meetings serve as a strategic forum for aligning statewide goals with local capacity-building efforts. Based on these discussions, the State and the Association jointly determine appropriate actions, including the scope, format, and delivery method of training. In addition to these structured meetings, eligible entities are encouraged to submit requests for training on specific topics directly to the State office. This responsive approach ensures that local needs are addressed in a timely and relevant manner. T&TA topics vary widely, encompassing areas such as ROMA implementation, data system usage, board governance, fiscal management, and program

performance. The State will collaborate closely with the State Association to identify qualified trainers and determine the most effective delivery method for each training. A blended approach is used, including: In-person sessions for hands-on learning and peer exchange Webinars for broader accessibility and cost-effective delivery This collaborative model ensures that training and technical assistance are both strategically aligned and locally responsive, supporting continuous improvement and capacity-building throughout the CSBG network.

8.2. Organizational Standards Technical Assistance: Does the state have Technical Assistance Plans (TAPs) in place for all eligible entities with unmet organizational standards, if appropriate? ☒ Yes ☐ No

Note: 8.2 is associated with State Accountability Measure 6Sb. The state should put a TAP in place to support eligible entities with one or more unmet organizational standards.

8.2a. Address Unmet Organizational Standards: Describe the state's plan to provide T/TA to eligible entities to ensure they address unmet Organizational Standards. If monitors identify unmet organizational standards, a plan will be developed with the agency, documented through electronic correspondence. Plans will include benchmarks and due dates. The state and agency will meet on a monthly basis until the standards have been met.

8.3. Training and Technical Assistance Organizations: Indicate the types of organizations through which the State Plans to provide training and/or technical assistance as described in item 8.1, and briefly describe their involvement. *[Check all that apply.]*

☐ All T/TA is conducted by the state

☐ CSBG eligible entities *(if checked, provide the expected number of CSBG eligible entities to receive funds)*

☐ Other community-based organizations

☒ State Community Action association

☒ Regional CSBG technical assistance provider(s)

☒ National technical assistance provider(s)

☒ Individual consultant(s)

☐ Tribes and Tribal Organizations

☐ Other

8.4. CSBG-Funded T/TA Performance Management Adjustment: Describe adjustments the state made to the training and technical assistance plan under this State Plan as compared to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

Note: This information is associated with State Accountability Measures 3Sd may pre-populate the state's annual report form

The State provides input and reviews the State Association and RPIC T&TA plans to enhance our state and region's ability to provide training as needed. The 2025 ACSI saw an 11-point decrease in T&TA. The State plans to continue holding regular webinars with the Association until it feels they are no longer needed. These meetings have been critical to deliver clear guidance from program staff, enhance linkages of state and local programs, and keep an open line of communication and technical assistance. The target for improvement will be a 15-point increase, which will be achieved through continued accessibility of State staff to provide regular and as needed technical assistance to eligible entities; identification of emerging topics and the development of trainings around them, such as AI and cyber security; the development of an annual in-person CSBG meeting; the implementation of new staff orientation and trainings as requested by eligible entities; ROMA 101 training for staff and board members; and the development of a ROMA cohort across the state. The state is developing a training evaluation plan that will be implemented over the course of the next two years to effectively measure and track T&TA satisfaction with the eligible entities. The Bureau Chief and State staff also attend State Association meetings and trainings, and the state provides funding assistance to support identified training needs of the Association.

Section 9: State Linkages and Communication

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

Form Approved
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SECTION 9 State Linkages and Communication

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

9.1. State Linkages and Coordination at the State Level:

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

Describe additional information as needed.

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

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

Montana Continuum of Care, Homeless Management Information System, Commodities. The Intergovernmental Human Services Bureau (IHSB) within the Montana Department of Public Health and Human Services (DPHHS) administers a comprehensive portfolio of programs designed to serve low-income individuals and communities across the state. These include the Community Services Block Grant (CSBG), Emergency Solutions Grant (ESG), the Low Income Home Energy Assistance Program (LIHEAP), and the Weatherization Assistance Program. A majority of CSBG-eligible entities administer all four of these complementary programs, enabling the State to strategically coordinate service delivery from the state level to local agencies. This integrated approach enhances efficiency, reduces duplication, and ensures that clients receive holistic support tailored to their needs. IHSB has implemented several cross-program initiatives to strengthen service alignment, including: Establishing categorical eligibility for LIHEAP applicants who are enrolled in TANF or SNAP Ensuring that single-parent households receiving services are informed about child support options and parental rights Actively participating in the Montana Continuum of Care to address housing and homelessness collaboratively In addition, IHSB oversees a tri-state Housing Opportunities for Persons with AIDS (HOPWA) program and serves as the USDA contractor for Montanas federal commodity food distribution program. These programs deliver nutritious food to Indian reservations, food banks, emergency feeding organizations, soup kitchens, and senior centers statewide. DPHHS has recently implemented the HEART (Healing and Ending Addiction through Recovery and Treatment) Initiative, a Medicaid waiver which addresses and promotes Medicaid objectives by expanding on the coverage of health care services that would otherwise not be available and increase access to an array of services that are expected to allow beneficiaries to more effectively access healthcare. In addition, the provision of this additional coverage may lower program costs through improved beneficiary health. The HEART Initiative adds services for Pre-Tenancy and Tenancy Support services for eligible beneficiaries diagnosed with serious mental illness (SMI) or substance use disorder (SUD), meet that states needs-based criteria, and meet a list of risk factors related to obtaining stable housing. A majority of eligible entities are in the process of becoming Medicaid providers for tenancy services as a need for these services have been identified in past community needs assessments. Montana remains committed to breaking down programmatic silos and fostering cross-sector collaboration to deliver high-quality, person-centered services. This philosophy underpins all efforts to help individuals and families achieve long-term stability and well-being.

9.2. State Linkages and Coordination at the Local Level:

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

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

Montana administers the Community Services Block Grant (CSBG) across a geographically and demographically diverse state, requiring a flexible yet coordinated approach to service delivery. The Intergovernmental Human Services Bureau (IHSB) ensures that CSBG-funded programs are implemented through a network of eligible entities that are deeply embedded in their communities. These entities serve as the primary drivers of coordination and collaboration at the local level. To avoid duplication of services and promote transformational outcomes for low-income communities, the State encourages and requires eligible entities to: Coordinate services with local governments, school districts, non-profit organizations, and regional coalitions Participate in community-based taskforces and social service networks to align efforts and share resources Develop and maintain partnerships with public and private sector organizations to expand service reach and impact Each eligible entity is required to conduct a Community Needs Assessment that identifies local needs, service gaps, and existing partnerships. These assessments inform the development of an Annual Work Plan/Community Action Plan, which outlines specific outcomes and strategies for coordination. Entities also submit written narrative assurances detailing the linkages and

collaborative efforts undertaken to meet community needs. These documents are reviewed by IHSB program staff and monitored annually to ensure compliance and effectiveness. All documentation is available upon request. At the state level, IHSB reinforces coordination through its administration of other complementary programs, including the Montana Continuum of Care and Housing Opportunities for Persons with AIDS (HOPWA). These programs are integrated with CSBG efforts to support housing stability, reduce homelessness, and improve access to supportive services. By fostering strong partnerships and requiring intentional coordination, Montana ensures that CSBG services are delivered efficiently, avoid duplication, and contribute to the transformation of low-income communities across the state.

9.3. Eligible Entity Linkages and Coordination

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

Note: This response will link to the corresponding CSBG assurance, item 14.5. and pre-populates the Annual Report, Module 1, Item G.3a.

The state requires eligible entities to coordinate funds at the local level. Its approach to assuring that all eligible entities coordinate and establish linkages in their communities has not changed. The method assures the effective delivery and coordination of CSBG services to low-income people and communities, avoiding duplication of services. The State first reviews the Community Assessment of Need for each eligible entity. This survey should identify the resources that may be lacking in their area but also what services are already being provided and if prospective clients know about them. Eligible entities use this information to develop their CSBG work plan which includes outcomes specific to linkages, coordination of services, and referrals, or they will submit a description on how they are engaging in such coordination. The CSBG Program Officer and Monitors review these documents, provide input, and approve the final version. Documents are available upon request. Monitors will then use the documents to evaluate the work eligible entities conduct throughout the year and during monitoring visits. Eligible entities are also required to report on linkage activity and referrals at least once per year. The State maintains a state-wide database in which eligible entities are required to capture client information including demographics, services provided, and programs utilized. Furthermore, while eligible entities provide several important and key services, they also have vast relationship networks in their respective communities, having been established for decades. Relationships have been developed and maintained throughout the years with existing service-based organizations. As new services become available, eligible entities gather the necessary information for clients and create open channels of communication where appropriate. Eligible entities' staff serve on boards, local planning committees, and other collaborative activities to ensure gaps in services are filled. While techniques and procedures differ between the ten unique Community Action Agencies in Montana, all ten work to meet the needs of their clients and his/her/their family. During the initial application process, eligible entities attempt to gather enough information to look at the client's full situation. If there are needed services outside the scope of the eligible entity, they will provide information and referrals to other organizations. These are documented in the client's case file and/or the state data management system. Case management and follow-up consultations are provided depending on program requirements. Eligible entities will track whether the client sought the referred service and depending on response, will attempt to have a final consultation with the client before exiting them from the program.

9.3b State Assurance of Eligible Entity Linkages to Fill Service Gaps: Describe how the eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations, according to the assurance under Section 676(b)(3)(B) of the CSBG Act.

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

Strategies to fulfill this requirement remain the same. Eligible entities provide several important and key services and have relationship networks in their respective communities. Relationships have been developed and maintained for years with existing service-based organizations; some having been established for decades. As new services become available, eligible entities gather the necessary information for clients and create open channels of communication where appropriate. Eligible entities' staff serve on boards, local planning committees and other collaborative activities to ensure gaps in services are filled. While techniques and procedures differ between the ten unique Community Action Agencies in Montana, all ten work to meet the needs of their clients and their families. During the initial application process, eligible entities attempt to gather enough information to look at the client's full situation. If there are needed services outside the scope of the eligible entity, they will provide information and referrals to other organizations. These are documented in the client's case file and/or the state data system. Case management and follow-up consultations are provided depending on program requirements. Eligible entities will track whether the client sought the referred service and depending on response, will attempt to have a final consultation with the client before exiting them from the program. In addition, each eligible entity submits a community needs assessment that identifies needs, addresses gaps in services, and highlights local level coordination used to achieve outcomes. They submit an annual work plan/community action plan that identifies these outcomes. In addition, eligible entities provide written narrative assurances describing the linkages and coordination done at the local level. This document describes any gaps in services and the strategy that will be used to address the gaps. If a gap is not currently being addressed or not being sufficiently addressed, entities are instructed to develop and implement a strategy to work with other organizations in their local communities. These are reviewed by program staff and monitored annually. Documents are available upon request.

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

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

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

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

DPHHS has a signed MOU to coordinate with the WIOA State Plan. It is a member of the statewide Workforce Investment Act Board and several eligible entities function in a similar manner at the local level. Many of the programs operated by eligible entities are coordinated by the DPHHS including Area Agencies on Aging, LIHEAP, TANF and Head Start. Eligible entities submit an annual work plan that identifies these services and outcomes. Montana is developing a new statewide data system to coordinate the State/eligible entity programs. As the measurement component of ROMA, the data system allows eligible entities to look at many facets of programs affecting low-income households to determine the effect on their lives. Eligible entities use the data system to track their WIOA programs and activities. In addition, eligible entities provide a narrative description of how they interact with WIOA. These are reviewed by program staff as part of the State Plan submission process. Documents are available upon request.

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

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

<p>IHSB manages the State's LIHEAP and Weatherization programs. CSBG Eligible Entities are recipients of these funds for the state of Montana. As such, IHSB monitors and oversees the implementation of these programs across the state as well as evaluates performance.</p>			
<p>9.6. Faith-based Organizations, Charitable Groups, Community Organizations: Describe how the state will assure local eligible entities will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations, according to the state's assurance under Section 676(b)(9) of the CSBG Act.</p>			
<p><i>Note: this response will link to the corresponding assurance, item 14.9.</i></p>			
<p>The State assures that all eligible entities coordinate and establish linkages in their communities, including faith-based organizations, charitable groups, and community organizations. Each eligible entity submits a community needs assessment that identifies needs, addresses gaps in services, and highlights local level coordination used to achieve outcomes. They are required to engage in these key sectors through the assessment process so that the information they gather provides a wholistic view of the community they serve. Eligible entities submit an annual CSBG work plan/community action plan that includes outcomes specific to coordinating and forming partnerships or a description of how they plan to conduct such coordination in their communities. Monitors use these documents to evaluate the work eligible entities conduct throughout the year and during monitor visits. Eligible entities are also required to report on coordinated activities and partnerships at least once a year. In addition, eligible entities provide written narrative assurances describing linkages and coordination done at the local level. These are also reviewed by program staff and monitored annually. Documents are available upon request.</p>			
<p>9.7. Coordination of Eligible Entity 90 Percent Funds with Public/Private Resources: Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act.</p>			
<p><i>Note: this response will link to the corresponding assurance, item 14.3c.</i></p>			
<p>Eligible entities provide a diverse range of services to their clients, utilizing both public and private funds to achieve maximum results. In a sparsely populated, rural state like Montana, the social fabric of most communities mandates that all groups work closely together. The State's resources are insufficient to allow individual agencies or organizations to go their own way, and most funding sources also include specific match requirements, making it essential for eligible entities to also have a diverse funding source.</p>			
<p>9.8. Coordination among Eligible Entities and State Community Action Association: Describe state activities for supporting coordination among the eligible entities and the state community action association.</p>			
<p><i>Note: This information will pre-populate the Annual Report, Module 1, Item G.5.</i></p>			
<p>The State believes it is important to support coordination among eligible entities and the State Association, keeping an open line of communication throughout the year. The State Association members currently meet virtually bi-weekly with State staff and will use this time to conduct official business as necessary. They have designated time at these meetings for State Association business. The IHSB Bureau Chief facilitates these meetings and includes IHSB section supervisors and other staff as appropriate. IHSB usually funds a yearly Directors training on a topic that the Association chooses as well as other training opportunities that encourage coordination. IHSB also facilitates a number of state-wide round tables and work groups that promote coordination between the organizations. They include a LIHEAP roundtable that meets annually at the end of each heating season, a Weatherization round table and a Weatherization Technical Committee that each meet separately, and the annual ESG round table. IHSB uses feedback from Eligible Entities to support and create new coordination activities. Over the course of the next two years, the State will convene a CSBG annual meeting.</p>			
<p>9.9. Communication with Eligible Entities and the State Community Action Association: In the table below, detail how the state intends to communicate with eligible entities, the state community action association, and other partners identified under this State Plan on the topics listed below. For any topic that is not applicable, select "Not Applicable" under Expected Frequency.</p>			
<p style="text-align: center;">Communication Plan</p>			
Subject Matter	Expected Frequency	Format	Brief description of "Other"
Upcoming Public and/or Legislative Hearings	Biannual	Email Website Webinar Public Notice	
State Plan Development	As needed	Meetings/Presentation Email Webinar 1:1 Phone Calls Public Notice	
Organizational Standards Progress	Annually	Email Webinar 1:1 Phone Calls	
State Accountability Measures Progress	Annually	Meetings/Presentation Email Webinar 1:1 Phone Calls	
Community Needs Assessments/ Community Action Plans	As needed	Email Webinar 1:1 Phone Calls	
State Monitoring Plans and Policies	Annually	Meetings/Presentation Email Webinar 1:1 Phone Calls	

Training and Technical Assistance (T/TA) Plans	Annually	Meetings/Presentation Email 1:1 Phone Calls	
ROMA and Performance Management	As needed	Meetings/Presentation	
State Interagency Coordination	As needed	Meetings/Presentation Email 1:1 Phone Calls	
CSBG Legislative/Programmatic Updates	As needed	Email Webinar	
Tripartite Board Requirements	Annually	Meetings/Presentation Email 1:1 Phone Calls	

9.10. Feedback to Eligible Entities and State Community Action Association:
Describe how the state will provide information to local entities and state community action associations regarding performance on state accountability measures.

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

The State will email the ACSI results to eligible entities and will present the information at one of our regular weekly meetings via a webinar to present feedback from OCS regarding performance on State Accountability Measures.

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

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

Communications saw a 16-point decrease from 85 to 69 in the ACSI report. The target is to increase the score by 5 points to 74 in the next two years. The State will continue open sharing of information, being readily available for eligible entities, and facilitating bi-weekly calls with the Association. The state will also begin implementing new quarterly program meetings to provide more in-depth updates, training information, and program adjustments; soliciting program operation feedback annually or semi-annually; and celebrating successes in the program throughout the year.

Section 10: Monitoring, Corrective Action, and Fiscal Controls

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

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SECTION 10 Monitoring, Corrective Action, and Fiscal Controls

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

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

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

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

	CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of "Other"
1	Action for Eastern Montana	Other	Onsite Review	FY1 Q3	06/01/2025	06/05/2025	Organizational standards review
2	District IV Human Resource Development Council	Other	Onsite Review	FY1 Q3	06/23/2025	06/27/2025	Organizational standards review
3	Opportunities Incorporated	Other	Onsite Review	FY1 Q4	07/07/2025	07/10/2025	Organizational standards review
4	District 6 Human Resource Development Council	Full On-site	Onsite Review	FY1 Q3	04/21/2025	04/24/2025	
5	District VII Human Resource Development Council	Full On-site	Onsite Review	FY1 Q3	05/27/2025	05/30/2025	
6	Rocky Mountain Development Council	Other	Onsite Review	FY1 Q2	01/27/2025	01/30/2025	Organizational standards review
7	District IX Human Resource Development Council	Other	Onsite Review	FY1 Q3	05/12/2025	05/15/2025	Organizational standards review
8	Community Action Partnership of Northwest Montana	Other	Onsite Review	FY1 Q3	06/15/2025	06/18/2025	Organizational standards review
9	District XI Human Resource Council	Full On-site	Onsite Review	FY1 Q3	04/07/2025	04/11/2025	
10	Action Incorporated	Other	Onsite Review	FY1 Q2	03/10/2025	03/14/2025	Organizational standards review
	CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of "Other"
1	Action for Eastern Montana	Full On-site	Onsite Review	FY2 Q3	06/01/2025	06/05/2025	
2	District IV Human Resource Development Council	Full On-site	Onsite Review	FY2 Q3	06/23/2025	06/27/2025	
3	Opportunities Incorporated	Full On-site	Onsite Review	FY2 Q4	07/07/2025	07/10/2025	
4	District 6 Human Resource Development Council	Other	Onsite Review	FY2 Q3	04/21/2025	04/24/2025	Organizational standards review
5	District VII Human Resource Development Council	Other	Onsite Review	FY2 Q3	05/27/2025	05/30/2025	Organizational standards review
6	Rocky Mountain Development Council	Full On-site	Onsite Review	FY2 Q1	01/27/2025	01/30/2025	
7	District IX Human Resource Development Council	Full On-site	Onsite Review	FY2 Q3	05/12/2025	05/15/2025	
8	Community Action Partnership of Northwest Montana	Full On-site	Onsite Review	FY2 Q3	06/15/2025	06/18/2025	

9	District XI Human Resource Council	Other	Onsite Review	FY2 Q3	04/07/2025	04/11/2025	Organizational standards review
10	Action Incorporated	Full On-site	Onsite Review	FY2 Q2	03/10/2025	03/14/2025	

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

Please follow the hyperlink to view current CSBG monitoring standards and process- <https://dphhs.mt.gov/assets/hcsd/csbgmanual/CSBGProgramPoliciesandProcedures.pdf> Please also see the attached document for the IHSB Internal Monitoring Guidelines

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

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

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

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

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

A full onsite review of each eligible entity is conducted every three years, but organizational standards are reviewed annually. Any newly designated entity will have an onsite review completed immediately after the first year of operation. All monitoring reports require a response to any adverse finding within 30 days. Significant findings that are not satisfactorily addressed will require the State to conduct a follow-up review including a return visit within 90 days of the initial monitoring report. If no further action is required and all findings have been properly addressed, the State will issue a Conclusion Letter confirming. Eligible entities with continued issues will be placed on a quality improvement plan. The State is available to participate in other appropriate reviews if asked to do so by Federal, State or local grantors.

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

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

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

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

Should the State ever determine that an eligible entity fails to comply with terms of its contract or the State plan, to provide CSBG services or to meet appropriate standards, goals or other requirements contained in the CSBG statute or regulations, it shall notify the eligible entity of the deficiency to be corrected, provide a timeline for correction, provide a requirement to correct the deficiency, explain the effects of non-compliance and offer training or technical assistance to correct the deficiency, if appropriate. The State shall provide written notification to the Office of Community Services within 30 calendar days of any Quality Improvement Plan implemented for an eligible entity. If the State determines that such training and technical assistance is not appropriate, it shall inform the Secretary with a report stating the reasons(s). Any termination or reduction in funding shall be in accordance with the terms of the States contract, CSBG rules and statute. Any such action shall provide notice and an opportunity for a hearing on the record, which shall be forwarded to the Secretary for his or her review.

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

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

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

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

10.8a. New Designation Citation: If yes, provide the citation(s) of the law and/or regulation.

State regulations mirror Federal regulations. United States Code Title 42 Chapter 106 has been inserted with a hyperlink into the State's online CSBG Policy Manual here: <https://dphhs.mt.gov/assets/hcsd/csbgmanual/CSBGProgramPoliciesandProcedures.pdf> and following regulations is a contractual requirement. It can also be found in Montana law here: <https://rules.mt.gov/browse/collections/aec52c46-128e-4279-9068-8af5d5432d74/policies/6917c9d4-cc2a-4a6c-9afb-e024f46a9f0a>

10.8b. New Designation Procedures: If no, describe state procedures for the designation of new eligible entities and how the procedures were made available to eligible entities and the public

10.9. Eligible Entity Termination: Do State CSBG statute and/or regulations provide for termination of eligible entities ☒ Yes ☐ No

10.9a. Termination Citation: If yes, provide the citation(s) of the law and/or regulation.

Administrative Rules of Montana - 37.2.925 TERMINATION OR REDUCTION OF ALLOTMENT (1) The allotment of a contractor who currently receives CSBG funding or who received funding in the previous program period can be terminated or reduced below the proportional share currently being received or received in the previous program period only for cause. The term "cause" includes but is not limited to: (a) a statewide redistribution of funds in response to: (i) the results of the most recent available census or other appropriate data; (ii) the establishment of a new entity eligible for funding; or (iii) severe economic dislocation; or (b) the contractor's failure to comply with the terms of its agreement to provide services.

<p>10.9b. Termination Procedures: If no, describe state procedures for termination of new eligible entities and how the procedures were made available to eligible entities and the public</p>
<p>10.10. Does the State CSBG statute and/or regulations specify a process the State CSBG agency must follow to re-designate an existing eligible entity? <input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>10.10a. If Yes, provide the citation(s) of the law and/or regulation. State regulations mirror Federal regulations. United States Code Title 42 Chapter 106 has been inserted with a hyperlink into the State's online CSBG Policy Manual here: https://dphhs.mt.gov/assets/hcsd/csbmanual/CSBGProgramPoliciesandProcedures.pdf and following regulations is a contractual requirement. It can also be found in Montana law here: https://rules.mt.gov/browse/collections/aec52c46-128e-4279-9068-8af5d5432d74/sections/f096bd09-f904-4680-bb13-c7f62ea398c2</p>
<p>10.10b. If No, describe State procedures for re-designation of existing eligible entities.</p>
<p align="center">Fiscal Controls and Audits and Cooperation Assurance</p>
<p>10.11. Fiscal Controls and Accounting: Describe how the state's fiscal controls and accounting procedures will a) permit preparation of the SF-425 Federal fiscal reports (FFR) and b) permit the tracing of expenditures adequate to ensure funds have been used appropriately under the block grant, as required by Block Grant regulations applicable to CSBG at 45 CFR 96.30(a).</p>
<p>The State fiscal control procedures and fund accounting are accomplished through established DPHHS fiscal procedures connected with the relevant assurances, contract provisions and any subsequently published administrative rules. All such procedures are reviewed and examined biennially by the Legislative Auditor of the State of Montana and published as a department audit. Copies are submitted to the Secretary. Contracts entered into between the State and the eligible entities are paid using a system where invoices must be reviewed and approved by a program officer and bureau fiscal staff for completeness and accuracy. All applicable cost and accounting standards of the Office of Management and Budget are part the State's contracts with the eligible entities. The State has required each eligible entity to establish procedures as well.</p>
<p>10.12. Single Audit Management Decisions: Describe state procedures for issuing management decisions for eligible entity single audits, as required by Block Grant regulations applicable to CSBG at 45 CFR 75.521.</p>
<p><i>Note: This information is associated with State Accountability Measure 4Sd.</i></p>
<p>The eligible entities completed audit is reviewed by both the Fiscal Monitoring Officer well as the Departments Internal Controls unit. A desk audit with the comments is sent to the IHSB Bureau Chief. The comments are reviewed. If there is an audit finding in the CSBG program the following steps are taken to resolve. 1. A conference call is set up to discuss the finding with the agency and get more information on the finding. IHSB may request additional information or documentation from the auditee, including a request for auditor assurance related to the documentation, as a way of mitigating disallowed costs 2. The management decision will clearly state whether the audit finding is sustained, the reasons for the decision, and the expected auditee action to repay disallowed costs, make financial adjustments, or take other action. If the auditee has not completed corrective action, a timetable for follow-up should be given. 3. IHSB will follow up and ensure that the agency takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the agency from IHSB detected through audits, on-site reviews, and other means. 4. Depending upon IHSB's assessment of risk posed by the agency, the following monitoring tools may be used to ensure proper accountability and compliance with program requirements and achievement of performance goals: a. Provide training and technical assistance on program-related matters. b. Perform on-sites reviews more frequently than annually. The Eligible Entities must comply with the requirements of Federal Office of Management and Budget (OMB) 2 CFR 200 of the Uniform Guidance statutorily and contractually. The agencies are also contractually obligated to provide the CSBG State Office with a copy of their audit. The monitoring process is detailed in the previously submitted answer but is also subjected to the same process and strategies for technical assistance, corrective action, and re-designation as outlined in Question 10.2.</p>
<p>10.13. Assurance on Federal Investigations: The state will "permit and cooperate with Federal investigations undertaken in accordance with Section 678D" of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act. <input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p><i>Note: This response will link with the corresponding assurance, Item 14.7.</i></p>
<p>10.13a. Federal Investigations Policies: Are state procedures for permitting and cooperating with federal investigations included in the state monitoring policies attached under 10.2? <input type="radio"/> Yes <input checked="" type="radio"/> No</p>
<p>10.13b. Closing Findings Procedures: If no, describe state procedures for permitting and cooperating with federal investigations.</p>
<p>DPHHS is fully committed to cooperating with any federal investigations. DPHHS will ensure timely communication, transparency, and coordination with any federal agencies by coordinating any requested information, facilitating site visits or interviews as needed, and complying with all applicable laws and regulations to support the investigation process.</p>
<p>10.14. Monitoring Procedures Performance Management Adjustment: Describe any adjustments the state made to monitoring procedures in this State Plan as compared to past plans? Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.</p>
<p><i>Note: This item is associated with State Accountability Measure 4Sb and may pre-populate the state's annual report form.</i></p>
<p>The department now has a dedicated staff member to complete fiscal monitoring of eligible entities separate from program monitoring.</p>

Section 11: Eligible Entity Tripartite Board

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

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SECTION 11 Eligible Entity Tripartite Board

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

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

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

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

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

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

The State evaluates Tripartite Board policies and procedures during its annual monitoring visit and records information on the Monitoring Tool. Any finding on the Tool will be addressed and corrected by the eligible entity. In addition, during the State Plan process, the State asks each eligible entity to provide a current copy of its board list which identifies the sector each member represents and terms.

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

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

Section 12: Individual and Community Eligibility Requirements

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

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SECTION 12 Individual and Community Income Eligibility Requirements

12.1. Required Income Eligibility:

Provide the income eligibility threshold for services in the state.

[Check one item below.]

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

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

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

If CSBG funds are used to provide direct services to households, the Department has determined that the household must be at or below 125% of the current federal poverty level (per 42 USC 9902) except when Congress has allowed a higher eligibility rate to be applied to the program, in which case the Department sets the household income eligibility to that higher rate which is currently 200% of the current federal poverty level. Such services must be included in the HRDC's work plan and approved by the Department. A client file is required for each household receiving CSBG direct services. At a minimum, files must contain: a signed and dated agency intake form sufficient to record data required for ROMA (or another agency's form where income and household number are recorded), verification of income eligibility and household size, the date(s) and type(s) of assistance provided, grievance procedures, and documentation that custodial parents in single-parent families were informed about the availability of child support services and referred to appropriate offices. Documentation is required for any custodial parent in a single-parent family that participates in programs, activities or services carried out or provided under the CSBG subtitle.

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

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

Eligible entities use a variety of methods to generally verify income eligibility for general/short term services like emergency food assistance including asking program participants income information at in-take, income eligibility self-attestation forms, examining census data to demonstrate the percentage of residents that meet eligibility thresholds in the area, and reviewing income information of existing and past clients in the state's database system who participated in programs that have already verified income. The state allows the most flexibility for the agencies to create their own policies which they must follow equitably. It is often the case that these services are sought by individuals or families that have already accessed a service with more demanding income verification processes. Because eligible entities are required to enter such clients into the database system, they can track all services sought by a client within the network state-wide.

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

Eligible entities can examine census data to demonstrate the percentage of residents that meet eligibility thresholds in the area as well as local economic and infrastructure information about the demographic make-up of towns and neighborhoods. The State monitors community-based programs to ensure they target low-income communities for those services that provide a community-wide benefit.

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

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

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SECTION 13 Results Oriented Management and Accountability (ROMA) System

13.1. Performance Measurement System:

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

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

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

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

The State of Montana uses all NASCSP <https://nascsp.org/csb/csb-resources/roma/> and Association of National Certified ROMA Trainers guidelines. http://www.roma-nptp.org/module_home_page.htm It has also established the ROMA framework in its CSBG Manual - <https://dphhs.mt.gov/assets/hcsd/csbmanual/CSBGProgramPoliciesandProcedures.pdf>

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

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

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

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

The State has incorporated ROMA principles in the areas of reporting, community action plans, strategic planning, community needs assessments, goal/target setting, case management, and Board trainings. The state will review the eligible entity documents, especially the Annual Report and Progress reports.

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

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

The State believes that ROMA is an essential tool for eligible entities. The State has one ROMA Trainer. The State has set aside discretionary funds for ROMA training, including, and encouraging each eligible entity to apply for ROMA scholarships to train at least one staff person to be a Certified ROMA Trainer or Implementer. The State also aids in funding ROMA trainings held locally. Agencies are required to use ROMA when developing their CSBG work plans. The new state database system that is being developed will give eligible entities the ability to comply with CSBG, ROMA and NPI goals and reporting requirements.

13.4. Eligible Entity Use of Data:

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

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

The State is developing a new statewide database system to launch in fall 2025. In this system, eligible entities are required to capture client information including demographics, services sought, and programs utilized. Data from the statewide database system is used to populate the annual report, work plan progress reports, provide program information to policy makers, and other agency specific needs. Throughout the year, the State works with eligible entities on data clean up and maintenance to ensure accuracy and to limit duplicate entries. Monitoring includes evaluation and verification of data. Eligible entities are encouraged to evaluate programs and adjust as needed to improve their service delivery. The State monitors board minutes, progress reports, the Annual Report and community action plan which document and validate the process.

Community Action Plans and Needs Assessments

13.5. Community Action Plan: Describe how the state will secure a Community Action Plan from each eligible entity, as a condition of receipt of CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act.

Note: this response will link to the corresponding assurance, Item 14.11.

The State requires eligible entities to submit a prospective Community Action Plan, or work plan, as part of the State Plan Application process. At the beginning of each fiscal year and before contracts are executed, eligible entities are given the opportunity to make amendments or adjustments to their Plan based on evaluation of programs, identified community needs and funding availability. It is a requirement met by all ten eligible entities.

13.6. Community Needs Assessment:

Describe how the State will assure that each eligible entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity's Community Action Plan, as required by Section 676(b)(11) of the CSBG Act.

Note: this response will link to the corresponding assurance, Item 14.11.

The State Association in partnership with the State Office implemented a new statewide Community Needs Assessment (CNA) in accordance with the Organizational Standards to standardize and increase the efficiency of CNAs conducted across the state. Eligible entities can still conduct local Community Needs Assessments, but the new statewide assessment will be conducted once every three years in accordance with the Organizational Standards to use as a tool in creating the Community Action Plan referred to in 13.5. A thorough review of the Community Needs Assessment in relation to the Community Action Plans developed by the eligible entities is completed by State staff who provide feedback to the eligible entities. The CNA checklist is used to ensure all minimum Organizational Standard requirements are met. Monitors also review CNA's during the annual onsite monitoring visit to ensure it is completed on a timely basis.

Section 14: CSBG Programmatic Assurances and Information Narrative

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

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

14.1 Use of Funds Supporting Local Activities

CSBG Services

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

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

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

The State contracts with Community Action Agencies to implement grant requirements. A statewide community needs assessment, in addition to local community needs assessments, are conducted which identify the specific needs of each Community Action Agency's communities. They submit an annual work plan that identifies services and outcomes. These are evaluated to ensure compliance with grant requirements. The State also provides a central database system so the eligible entities and monitors may better track their progress and evaluate the success of programs. These are reviewed by program staff and monitors who evaluate the progress of each eligible entities' work plan application submission. Documents are available upon request.

Needs of Youth

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

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

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

The State evaluates and monitors the progress of each eligible entities work plan application submission which includes services that meet the needs of youth and their related outcomes. The State provides a central database system so the eligible entities and monitors may better track their progress and evaluate the success of programs. In addition, eligible entities provide written narrative assurances describing the work that will be done on the local level, which specifically address 676(b)(1)(B). These are reviewed by program staff and monitors who evaluate the progress of each eligible entities' work plan application submission. Documents are available upon request.

Coordination of Other Programs

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

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

Coordination is an important tool used by eligible entities to fill service gaps and ensure programs are the most effective. The State evaluates and monitors the progress of the statewide community needs assessment and work plan application submission which includes information about program coordination. In addition, eligible entities provide written narrative assurances describing the work that will be done on the local level, which specifically address 676(b)(1)(C). These are reviewed by program staff and monitors who evaluate the progress of each eligible entities' work plan application

submission. Documents are available upon request.
State Use of Discretionary Funds
14.2 676(b)(2) Describe "how the state intends to use discretionary funds made available from the remainder of the grant or allotment described in section 675C(b) in accordance with this subtitle, including a description of how the state will support innovative community and neighborhood-based initiatives related to the purposes of this subtitle."
<i>Note: The State describes this assurance under "State Use of Funds: Remainder/Discretionary," items 7.9 and 7.10</i>
Eligible Entity Service Delivery, Coordination, and Innovation
14.3. 676(b)(3) "Based on information provided by eligible entities in the state, a description of..."
14.3a. 676(b)(3)(A) Describe "the service delivery system, for services provided or coordinated with funds made available through grants made under 675C(a), targeted to low-income individuals and families in communities within the state;
The State evaluates and monitors the progress of each eligible entity's work plan application submission which includes a description of each eligible entity's service delivery system. These are reviewed by program staff and monitors who evaluate the progress of each eligible entity's work plan application submission. Documents are available upon request. Each agency has a slightly different approach to service delivery, however, they are all similar in their general application. Applicants undergo an eligibility assessment based on information provided by completing an application and presenting any required verification based on program requirements. Agencies use a central database system to capture client information and the services they receive. When needed, a more in-depth assessment is completed. Then a service plan is developed. Referrals are made as needed. Eligible entity staff provides case management and follow-ups as needed and as program guidelines stipulate. Outcomes are tracked as much as possible for all participants.
Eligible Entity Linkages - Approach to Filling Service Gaps
14.3b. 676(b)(3)(B) Describe "how linkages will be developed to fill identified gaps in the services, through the provision of information, referrals, case management, and followup consultations."
<i>Note: The state describes this assurance in the state linkages and communication section, item 9.3b.</i>
Strategies to fulfill this requirement remain the same. Eligible entities provide several important and key services and have relationship networks in their respective communities. Relationships have been developed and maintained for years with existing service-based organizations; some having been established for decades. As new services become available, eligible entities gather the necessary information for clients and create open channels of communication where appropriate. Eligible entities' staff serve on boards, local planning committees and other collaborative activities to ensure gaps in services are filled. While techniques and procedures differ between the ten unique Community Action Agencies in Montana, all ten work to meet the needs of their clients and their families. During the initial application process, eligible entities attempt to gather enough information to look at the client's full situation. If there are needed services outside the scope of the eligible entity, they will provide information and referrals to other organizations. These are documented in the client's case file and/or the state data system. Case management and follow-up consultations are provided depending on program requirements. Eligible entities will track whether the client sought the referred service and depending on response, will attempt to have a final consultation with the client before exiting them from the program. In addition, each eligible entity submits a community needs assessment that identifies needs, addresses gaps in services, and highlights local level coordination used to achieve outcomes. They submit an annual work plan/community action plan that identifies these outcomes. In addition, eligible entities provide written narrative assurances describing the linkages and coordination done at the local level. This document describes any gaps in services and the strategy that will be used to address the gaps. If a gap is not currently being addressed or not being sufficiently addressed, entities are instructed to develop and implement a strategy to work with other organizations in their local communities. These are reviewed by program staff and monitored annually. Documents are available upon request.
Coordination of Eligible Entity Allocation 90 Percent Funds with Public/Private Resources
14.3c. 676(b)(3)(C) Describe how funds made available through grants made under 675C(a) will be coordinated with other public and private resources."
<i>Note: The state describes this assurance in the state linkages and communication section, item 9.7.</i>
Eligible entities provide a diverse range of services to their clients, utilizing both public and private funds to achieve maximum results. In a sparsely populated, rural state like Montana, the social fabric of most communities mandates that all groups work closely together. The State's resources are insufficient to allow individual agencies or organizations to go their own way, and most funding sources also include specific match requirements, making it essential for eligible entities to also have a diverse funding source.
Eligible Entity Innovative Community and Neighborhood Initiatives, Including Fatherhood/Parental Responsibility
14.3d. 676(b)(3)(D) Describe "how the local entity will use the funds [made available under Section 675C(a)] to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting."
<i>Note: The description above is about eligible entity use of 90 percent funds to support these initiatives. States may also support these types of activities at the local level using State remainder/discretionary funds, allowable under Section 675C(b)(1)(F). In this State Plan, the State indicates funds allocated for these activities under item 7.9(f).</i>
The State contracts with Community Action Agencies to implement grant requirements. Each eligible entity submits a community needs assessment that identifies the specific needs of that community. They submit an annual work plan that identifies services and outcomes. These are evaluated to ensure compliance with grant requirements. Documents are available upon request.
Eligible Entity Emergency Food and Nutrition Services
14.4. 676(b)(4) Describe how the state will assure "that eligible entities in the state will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among

low-income individuals."
The Intergovernmental Human Services Bureau, which is the CSBG operating unit of DPHHS, is also the USDA contractor for the State's federal USDA Foods program. As such, it operates and maintains the USDA Foods warehouse and is prepared to deliver food per USDA disaster regulations in case of an emergency to the eligible entities, as well as other feeding sites. The eligible entities also have access to the State's food bank network and other local sources of food to be able to meet any local emergency. Eligible Entities are required to assure compliance with this assurance and submit information on how it will be conducted in their region. The State Office uses the State Plan application process to review individual need assessments and work plans as well as the State's monitoring process and annual report to review and verify Eligible Entity compliance in the fulfillment of this requirement. Documents are available upon request.
State and Eligible Entity Coordination/linkages and Workforce Innovation and Opportunity Act Employment and Training Activities
14.5. 676(b)(5) Describe how the state will assure "that the state and eligible entities in the state will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services, and [describe] how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 3 of the Workforce Innovation and Opportunity Act, in the state and in communities with entities providing activities through statewide and local workforce development systems under such Act."
<i>Note: The state describes this assurance in the state linkages and communication section, items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b.</i>
State Coordination/Linkages and Low-income Home Energy Assistance
14.6. 676(b)(6) Provide "an assurance that the state will ensure coordination between antipoverty programs in each community in the state, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low income home energy assistance) are conducted in such community."
<i>Note: The state describes this assurance in the state linkages and communication section, items 9.2 and 9.5.</i>
Federal Investigations
14.7. 676(b)(7) Provide "an assurance that the state will permit and cooperate with Federal investigations undertaken in accordance with section 678D." Yes
<i>Note: The state addresses this assurance in the Fiscal Controls and Monitoring section, item 10.13.</i>
Funding Reduction or Termination
14.8. 676(b)(8) Provide "an assurance that any eligible entity in the state that received funding in the previous fiscal year through a community services block grant made under this subtitle will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the state determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b)." Yes
<i>Note: The state addresses this assurance in the Fiscal Controls and Monitoring section, item 10.7.</i>
Coordination with Faith-based Organizations, Charitable Groups, Community Organizations
14.9. 676(b)(9) Describe how the state will assure "that the state and eligible entities in the state will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the state, including religious organizations, charitable groups, and community organizations."
<i>Note: The state describes this assurance in the state Linkages and Communication section, item 9.6.</i>
Eligible Entity Tripartite Board Representation
14.10. 676(b)(10) Describe how "the state will require each eligible entity in the state to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation."
<i>Note: The state describes this assurance in the Eligible Entity Tripartite Board section, 11.3.</i>
The State evaluates Tripartite Board policies and procedures during its annual monitoring visit and records information on the Monitoring Tool. Any finding on the Tool will be addressed and corrected by the eligible entity. In addition, during the State Plan process, the State asks each eligible entity to provide a current copy of its board list which identifies the sector each member represents and terms.
Eligible Entity Community Action Plans and Community Needs Assessments
14.11. 676(b)(11) Provide "an assurance that the state will secure from each eligible entity in the services block grant made under this subtitle for a program, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs."
<i>Note: The state describes this assurance in the ROMA section, items 13.5 and 13.6.</i>
State and Eligible Entity Performance Measurement: ROMA or Alternate system
14.12. 676(b)(12) Provide "an assurance that the state and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated

development pursuant to 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and [describe] outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization."

Note: The state describes this assurance in the ROMA section, items 13.1, 13.2, 13.3, and 13.4.

Validation for CSBG Eligible Entity Programmatic Narrative Sections

14.13. 676(b)(13) Provide "information describing how the state will carry out the assurances described in this section."

Note: The state provides information for each of the assurances directly in section 14 or in corresponding items throughout the State Plan, which are included as hyperlinks in section 14.



By checking this box, the state CSBG authorized official is certifying the assurances set out above.

Section 15: Federal Certifications

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

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SECTION 15 Federal Certifications

15.1. CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

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

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

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

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

Statement for Loan Guarantees and Loan Insurance

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

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

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

15.1. Lobbying

After assurance select a check box:



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

15.2. CERTIFICATION REGARDING DRUG-FREE WORKPLACE REQUIREMENTS

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

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

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

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

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

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

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

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

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Grantees Other Than Individuals)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Alternate II. (Grantees Who Are Individuals)

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

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

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

15.2. Drug-Free Workplace Requirements

After assurance select a check box:



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

15.3. CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS

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

Instructions for Certification

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Instructions for Certification

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

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

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

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

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

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

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

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

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

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

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

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

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

15.3. Debarment

After assurance select a check box:



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

15.4. CERTIFICATION REGARDING ENVIRONMENTAL TOBACCO SMOKE

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

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

15.4. Environmental Tobacco Smoke

After assurance select a check box:



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

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

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