

CSBG State Plan

Program Name: Community Services Block Grant

Grantee Name: HUMAN SERVICES VERMONT AGENCY OF

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 checked="" type="radio"/> Annual <input type="radio"/> Other (2 Year)		* 1.c. Consolidated Application/Plan/Funding Request? Explanation:	
		* 1.d. Version: <input checked="" type="radio"/> Initial <input type="radio"/> Resubmission <input type="radio"/> Revision <input type="radio"/> Update		2. Date Received:	
		3. Applicant Identifier:		State Use Only:	
		4a. Federal Entity Identifier:		5. Date Received By State:	
		4b. Federal Award Identifier:		6. State Application Identifier:	
7. APPLICANT INFORMATION					
* a. Legal Name: HUMAN SERVICES VERMONT AGENCY OF					
* b. Employer/Taxpayer Identification Number (EIN/TIN): 1036000274A8				* c. Organizational UEI: YLQARK22FMQ1	
* d. Address:					
* Street 1:	Center Building	Street 2:	280 State Drive		
* City:	WATERBURY	County:			
* State:	VT	Province:			
* Country:	United States	* Zip / Postal Code:	05671 - 1000		
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: Lily	Middle Name:	* Last Name: Sojourner		
Suffix:	Title: Director	Organizational Affiliation:			
* Telephone Number: (802) 585-4365	Fax Number:	* Email: lily.sojourner@vermont.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 VT			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 Lily Sojourner	18c. Telephone (area code, number and extension) 18d. Email Address lily.sojourner@vermont.gov
18b. Signature of Authorized Certifying Official 	18e. Date Report Submitted (Month, Day, Year) 09/26/2025
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 checked="" type="radio"/> one-year <input type="radio"/> two-year	
1.1a. Provide the federal fiscal years this plan covers:		Year One 2026	Year Two
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 type="radio"/> Yes <input checked="" 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"/> Department Name	
<input type="checkbox"/> Authorized Official	<input type="checkbox"/> Street Address	<input type="checkbox"/> City	
<input type="checkbox"/> Zip Code	<input type="checkbox"/> Office Number	<input type="checkbox"/> Fax Number	
<input type="checkbox"/> Email Address	<input type="checkbox"/> Website		
1.2a. Lead agency		Vermont Agency of Human Services	
1.2b. Cabinet or administrative department of this lead agency <i>[Check one and provide a narrative where applicable]</i>			
<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		Department for Children and Families	
1.2d. Authorized Official of the Lead Agency			
Name: Lily Sojourner		Title: Director, Office of Economic Opportunity	
1.2e. Street Address		280 State Drive	
1.2f. City		Waterbury	1.2g. State VT
		1.2h. Zip 05671	
1.2i. Telephone number 802 585 - 4365 ext.		1.2j. Fax number 802 241 - 0450	
1.2k. Email address lily.sojourner@vermont.gov		1.2l. Lead agency website https://humanservices.vermont.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"/>	Street Address
<input type="checkbox"/>	City	<input type="checkbox"/>	Zip Code	<input type="checkbox"/>	Office Number
<input type="checkbox"/>	Fax Number	<input type="checkbox"/>	Email Address	<input type="checkbox"/>	Website
1.4a. Agency Name Office of Economic Opportunity, Department for Children and Families, Agency of Human Services					
1.4b Point of Contact Name					
Name: Geoffrey Pippenger			Title: Community Services Director, OEO		
1.4c. Street Address			280 State Drive		
1.4d. City			Waterbury	1.4e. StateVT	1.4f. Zip 05671
1.4g. Telephone Number 802 798 - 912 ext.			1.4h. Fax Number -		
1.4i. Email Address geoffrey.pippenger@vermont.gov			1.4j. Agency Website https://dcf.vermont.gov/o eo		
1.5. Provide the following information in relation to theState 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"/>	Street Address
<input type="checkbox"/>	City	<input type="checkbox"/>	State	<input type="checkbox"/>	Zip Code
<input type="checkbox"/>	Office Number	<input type="checkbox"/>	Fax Number	<input type="checkbox"/>	Email Address
<input type="checkbox"/>	Website	<input type="checkbox"/>	RPIC Lead		
1.5a. Agency Name Vermont Community Action Partnership (c/o Champlain Valley Office of Economic Opportunity)					
1.5b. Executive Director or Point of Contact					
Name: Jan Demers			Title:		
1.5c. Street Address			255 S. Champlain Street		
1.5d. City			Burlington	1.5e. StateVT	1.5f. Zip 05401
1.5g. Telephone number 802 777 - 1954 ext.			1.5h. Fax number -		
1.5i. Email Address jandemers@cvoeo.org			1.5j. State Association Website https://vermontcap.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)

Form Approved
OMB No: 0970-0382
Expires:08/31/2027

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.*

VSA Title 3, Chapter 59, Community Service Agencies <http://legislature.vermont.gov/statutes/fullchapter/03/059>

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

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

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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.

The mission of the Agency of Human Services is to improve the conditions and well-being of people in Vermont. The mission is a commitment to fostering positive change in the lives of Vermonters. It underscores our dedication to creating an environment where individuals not only survive but thrive. The Agency strives to improve the health and well-being of Vermonters and to protect those among us who are unable to protect themselves. The Agency of Human Services was created by the Vermont Legislature to serve as the umbrella organization for all health and human service activities within state government. The Department for Children and Families, as part of an integrated Agency of Human Services, fosters the healthy development, safety, well-being, and self-sufficiency of Vermonters. The Office of Economic Opportunity is a division of the Department for Children and Families. The mission of the Vermont Office of Economic Opportunity, which administers the Community Services Block Grant, is to increase the self-sufficiency of Vermonters, strengthen Vermont communities, and eliminate the causes and symptoms 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. to provide a range of services and activities having a measurable and potentially major impact on causes and effects of poverty in the community or those areas of the community where poverty is a particularly acute problem; 2. to provide activities designed to assist participants with low-income, including the elderly poor; a. to secure and retain meaningful employment; b. to attain an adequate education; c. to make better use of available income; d. to obtain and maintain adequate housing and a suitable living environment; e. to obtain emergency assistance through loans or grants to meet immediate and urgent individual and family needs including the need for health services, nutritious food, housing and employment-related assistance; f. to remove obstacles and solve problems which block the achievement of self-sufficiency; g. to achieve greater participation in the affairs of the community; and h. to make more effective use of other programs related to this subtitle; 3. to provide on an emergency basis for the provision of such supplies and services, nutritious foodstuffs and related services, as may be necessary to counteract conditions of starvation and malnutrition among the poor; 4. to coordinate and establish linkages between governmental and other social services programs to assure the effective delivery of such services to individuals with low-income; 5. to encourage the use of entities in the private sector of the community in efforts to ameliorate poverty in the community; and 6. to provide for coordination between anti-poverty programs in each community, where appropriate, with emergency energy crisis programs under Title XXVI of this Act (relating to Low Income Home Energy Assistance) conducted in such community. States CSBG-specific goals for State administration: For the period covered by this State CSBG Plan, the Office of Economic Opportunity has set the following goals for State administration: 1. Support the use of full cycle performance management to document and enhance all programs. Strategies: The State Office and State Association are prioritizing efforts in the coming year around the annual report, given the upcoming changes. This includes bringing together the Community Action Agencies virtually and in person to review the changes as well as discuss effective practices in terms of ROMA, quarterly reporting, and data management and visualization. 2. Strengthening CSBG Administration. Strategies: Create opportunities for peer learning around the organizational standards, both in terms of maintaining the standards as well as continuing to grow and strengthen practices. Share tools and practices among the network, in conjunction with the State Association, across all standards but in particular Community Assessment, Organizational Leadership, Board Governance, Strategic Planning, and Data & Analysis.

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 applies 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)

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 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)

<input type="checkbox"/>	Community Action Partnership (NCAP)
<input type="checkbox"/>	Community Action Program Legal Services (CAPLAW)
<input type="checkbox"/>	CSBG Tribal Training and Technical Assistance (T/TA) provider
<input type="checkbox"/>	Regional Performance Innovation Consortium (RPIC)
<input type="checkbox"/>	Association for Nationally Certified ROMA Trainers (ANCRT)
<input checked="" 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.

(Note: This information is associated with State Accountability Measures 1Sa(ii) and may pre-populate the State's annual report form)

The State Office of Economic Opportunity has discussed the State Plan process and content with the Vermont Community Action Partnership (State Association) at the several 2025 State Association meetings (May 2, June 13, July 11, and August 1), which includes the Executive Directors from each of Vermont's five Community Action Agencies. A copy of the plan was sent to each eligible entity for feedback. The eligible entities were also notified of the State Plan public hearing on June 18, 2025. The State Association provided only minor copy edits.

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.

(Note: This information is associated with State Accountability Measures 1Sb(i) and (ii) and pre-populate the Annual Report, Module 1, Item B.1.)

The State did not make changes to the State Plan development procedures under this State Plan. Like the previous plan, the State discussed the State Plan development procedures with the eligible entities at State Association meetings, including the timeline determined by the OCS information memoranda on the State application of funds and the joint block grant public hearing. The State discussed the State Plan Process with the State Association in May, including the Public Hearing date. The State offered to connect individually with any Executive Director interested in learning more about the process and welcomed feedback on the plan.

3.5. Eligible Entity Overall Satisfaction:
 Provide the State's target for eligible entity Overall Satisfaction during the performance period:

Year One	95	Year Two	
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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.

(Note: Item 3.5 is associated with State Accountability Measure 8S and may pre-populate the State's annual report form)

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 held at 9:00am on June 18, 2025 at the Agency of Human Services, in Waterbury, Vermont. A virtual option was also provided. Copies of the plan summary were and are available for public inspection from the Vermont Agency of Human Services website as of May 27, 2025. No comments were received. OEO provided opportunities for review and input of the draft State Plan at State Association (VCAP) meetings, in which the Executive Director of each eligible entity is present. Community Action Agency Executive Directors were notified of the state plan process at a VCAP meeting on May 2, 2025 and invited to the public hearing, a draft was shared on April 24, 2025 in advance of the May 2, 2025 meeting. OEO asked for additional input from CAP directors at VCAP meetings in June and July 2025.

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.

The public hearing notice appeared in five newspapers statewide on May 30, 2025. The notice was published in the Bennington Banner, Brattleboro Reformer, Burlington Free Press, Rutland Herald, and Time Argus. It noted the date, time, place, and subject matter of the public hearing as well as provided contact information if members of the public had questions about the hearing. Eligible entities, limited purpose sub-grantees and other interested parties are invited to attend. In addition, copies of the plan summary were and are available for public inspection from the Vermont Agency of Human Services website as of May 27, 2025. The Community Action Agencies were notified of the public hearing at their meetings on May 2, 2025 and June 13, 2025. The public hearing was held at 9:00am on June 18, 2025 at the Agency of Human Services, in Waterbury, Vermont. A virtual option was also provided. No members of the public appeared or commented.

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	06/18/2025	Waterbury, VT and virtual	Public	<input type="checkbox"/>
2	02/05/2025	Vermont Legislature, Montpelier, VT House Appropriations	Legislative	<input type="checkbox"/>
3	02/07/2025	Vermont Legislature, Montpelier, VT House Human Services	Legislative	<input type="checkbox"/>
4	02/12/2025	Vermont Legislature, Montpelier, VT House Human Services	Legislative	<input type="checkbox"/>
5	03/14/2025	Vermont Legislature, Montpelier, VT Senate Appropriations	Legislative	<input type="checkbox"/>
6	03/18/2025	Vermont Legislature, Montpelier, VT House Human Services	Legislative	<input type="checkbox"/>
7	03/19/2025	Vermont Legislature, Montpelier, VT House Human Services	Legislative	<input type="checkbox"/>
8	04/09/2025	Vermont Legislature, Montpelier, VT Senate Health & Welfare	Legislative	<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.

<https://legislature.vermont.gov/committee/meeting-detail/2026/9/621> <https://legislature.vermont.gov/committee/meeting-detail/2026/23/1183> <https://legislature.vermont.gov/committee/meeting-detail/2026/16/571> <https://legislature.vermont.gov/committee/meeting-detail/2026/16/675> <https://legislature.vermont.gov/committee/meeting-detail/2026/27/1536> SHW (regarding CSBG & H.91)

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	BROC - Community Action in Southwest Vermont	Rutland, Bennington Counties (except Pittsfield Town)	Non-Profit	Community Action Agency
2	Champlain Valley Office of Economic Opportunity (CVOEO)	Chittenden, Franklin, Grand Isle Counties, and Addison County (except Hancock and Granville Towns)	Non-Profit	Community Action Agency
3	Capstone Community Action	Lamoille, Orange, Washington Counties, and Pittsfield, Granville, Hancock, Rochester, Bethel, Stockbridge, Royalton, Sharon and Barnard Towns	Non-Profit	Community Action Agency
4	Northeast Kingdom Community Action (NEKCA)	Caledonia, Essex, Orleans Counties	Non-Profit	Community Action Agency
5	Southeastern Vermont Community Action (SEVCA)	Windham and Windsor Counties (except Rochester, Bethel, Stockbridge, Royalton, Sharon and Barnard Towns)	Non-Profit	Community Action Agency

5.2. Total number of CSBG eligible entities 5

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.

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

Describe rigor compared to COE-developed Standards

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.

The State Office of Economic Opportunity will annually distribute an Organizational Standard Submission Sheet to each agency. Agencies will self-assess and submit the completed tool along with documentation by July 30th of each year. The State Office of Economic Opportunity will review and validate the assessment within 60 calendar days. Every three years, the State Office of Economic Opportunity conducts its onsite monitoring of eligible entities. During regular onsite monitoring, staff of the State Office of Economic Opportunity will review documentation onsite and write up a report of their findings. The State Office of Economic Opportunity meets monthly in person with the Vermont Community Action Partnership and will use this time as an opportunity to provide feedback to the network and jointly plan technical assistance and training. Each eligible entity provides quarterly CSBG NPI reports to the State Office. Entities with ongoing technical assistance plans for organizational standards will submit updates, along with supporting documentation, quarterly at the time of NPI report submission.

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: 0			
CSBG Eligible Entity		Description / Justification	Delete
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 Two	0%
<i>Note: Item 6.5 is associated with State Accountability Measures 6Sa and prepopulate the Annual report, Module 1, Table D.2.</i>			

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
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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 Historic Base + Formula with Variables

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

The amount to be awarded to each Community Action Agency will be determined by the application of the State Office of Economic Opportunity allocation formula. This formula is designed to ensure that each eligible entity receives an amount sufficient to provide an administrative funding base and, further, to ensure that funding to specific areas during subsequent years corresponds to the current economic situation of each area. Prior to the award of CSBG funds, the Office of Economic Opportunity will reserve 10 percent of the funds awarded; five percent will be used for State administration of the program. With the balance of the funds reserved, the State may: 1. transfer in accordance with Section 675(c)(5) of the CSBG Act; or 2. utilize for the purpose of funding special projects which have proven to be, or may prove to be particularly effective in ameliorating the causes of poverty in communities within the State; or 3. distribute through the allocation formula. By statute, Vermont shall distribute 90% of its total CSBG award to eligible entities. The Office of Economic Opportunity allocation formula is updated periodically to address the distribution of this statutory 90% to Vermont's five Community Action Agencies while allowing for adjustments to be made as current, local poverty data become available. The State Office of Economic Opportunity has adopted the FY 2018 Community Action Agencies distributions as the new base levels for funding. In any year where Vermont receives an increase or decrease in core CSBG funding available to eligible entities above or below the FY 2017 base level of \$3,305,030 the amount allocated to each eligible entity shall be adjusted with a corresponding percentage increase or decrease in funding. In this way, a 5% increase in Vermont's CSBG award would result in a 5% increase to each eligible entity's allocation for that year; likewise in the experience of a decrease to Vermont's CSBG award. In FY 2018, the State Office of Economic Opportunity reviewed the formula allocation in partnership with eligible entities, and decided to postpone any amendment to the formula until the next 10-year census data is available for review and analysis. **HISTORICAL NOTE** FY 2010 base awards were arrived at by distributing the historical FFY 1993 base of \$2,051,460 according to the following formula: 50% divided equally 40% on the basis of eligible population 5% on the basis of per capita income 5% excess unemployment and the excess of \$1,305,540 on the basis of each eligible entity's service territory's share of the State's total eligible population (defined as the number of persons at or below 125% of federal poverty level).

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 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	0.00%
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Planned CSBG 90 Percent Funds

CSBG Eligible Entity	Year One Funding Amount \$	Delete
BROC - Community Action in Southwest Vermont	\$644,630	
Champlain Valley Office of Economic Opportunity (CVOEO)	\$1,061,299	
Capstone Community Action	\$689,322	
Northeast Kingdom Community Action (NEKCA)	\$662,544	
Southeastern Vermont Community Action (SEVCA)	\$561,929	
Total	\$3,619,724	

CSBG Eligible Entity Year Two

CSBG Eligible Entity	Year Two Funding Amount \$	Delete
BROC - Community Action in Southwest Vermont	\$0	
Champlain Valley Office of Economic Opportunity (CVOEO)	\$0	
Capstone Community Action	\$0	
Northeast Kingdom Community Action (NEKCA)	\$0	
Southeastern Vermont Community Action (SEVCA)	\$0	

Total	50
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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).

All agencies identified as eligible to apply for funds shall submit an application before the beginning of the grant year in a form prescribed by the State Office of Economic Opportunity in the Request for Work Plan. The State Office of Economic Opportunity has developed a Request for Work Plan package for distribution to all eligible entities currently operating programs under the CSBG Act. Work Plans must include a line item budget and a monthly expenditure plan. All Work Plans are reviewed by the State Office of Economic Opportunity within 30 days of receipt. Work Plans as well as the process and timeline for review are evaluated by both the Community Services Director and the OEO Director. All Community Action Agencies in Vermont that have received funds in the previous fiscal year will be notified as soon as practical, but no less than thirty days before the new fiscal year of status of funding for the upcoming fiscal year. The OEO Director, in consultation with the Community Services Director, determines the timeline for drafting and executing grant agreements once funding is made available by the federal office. Funds given to grantees pursuant to this plan must be used in furtherance of the goals and objectives set forth above and will be governed by a grant agreement between the State Office of Economic Opportunity and the sub-grantee as well as this plan and applicable law. The grant agreement shall be based on the sub-grantee's application for funding as approved. The Office of Economic Opportunity may condition the sub-grantee's receipt of the block grant funds on such terms as the State deems appropriate, provided the terms are consistent with and in furtherance of this plan and the Federal law governing CSBG.

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

A cash advance in an amount sufficient to fund one months operation shall be made to each agency upon the effective date of the grant executed with the State Office of Economic Opportunity. Subsequent transmittals of cash shall be made in monthly payments, which may contain a blend of reimbursement and advance. In the event that a continuing resolution or similar action should delay the determination of the States CSBG allocation, or temporarily restrict spending authority, the State Office of Economic Opportunity, may, at its discretion, amend this procedure to restrict payments to reimbursement of actual eligible costs up to a level specified in the Community Action Agencies approved monthly expenditure plan.

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.

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.

The State utilizes a single document which consolidates existing policies. As a part of its ongoing, working relationships with eligible entities, the State Office of Economic Opportunity regularly solicits and receives feedback from eligible entities on grant administration procedures. The State Office of Economic Opportunity is not making any adjustments from FFY2026 but will continue to work with eligible entities to improve grant administration procedures within its purview, to relay feedback to respective units within State government, and to connect eligible entities directly with those units, as appropriate should any new issues arise.

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%)	
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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	4.00	Year Two	
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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	1.50	Year Two	
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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%)	0.00%
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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>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.</p>		
<i>Note: This information is associated with State Accountability Measures 3Sa and pre-populates the annual report Module 1, Table E.7.</i>		
Remainder/Discretionary Fund Uses	Year One Planned \$	Brief description of services/activities and/or activities
7.9a. Training/technical assistance to eligible entities	\$101,096.00	These planned services/activities will be described in State Plan Item 8.1.
7.9b. Coordination of state-operated programs and/or local programs	\$70,000.00	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	\$10,000.00	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	NA
7.9e. Asset-building programs	\$0.00	NA
7.9f. Innovative programs/activities by eligible entities or other neighborhood groups	\$10,000.00	Other innovative activities at eligible entities or other community-based nonprofits, such as those addressing food security/systems, supporting adult education, or promising practices to address homelessness.
7.9g. State charity tax credits	\$0.00	NA
7.9h. Other activities, specify in column 3	\$10,000.00	Unforeseen or urgent requests for eligible entities or other eligible community-based nonprofits; including technical assistance to other community-based nonprofits.
Total	\$201,096.00	
Remainder/Discretionary Fund Uses	Year Two Planned \$	Brief description of services/activities
7.9a. Training/technical assistance to eligible entities	\$0.00	These planned services/activities will be described in State Plan Item 8.1.
7.9b. Coordination of state-operated programs and/or local programs	\$0.00	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	\$0.00	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	\$0.00	
7.9g. State charity tax credits	\$0.00	
7.9h. Other activities, specify in column 3	\$0.00	
Total	\$0.00	
<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. [Check all that apply and narrative where applicable]</p>		
<input type="checkbox"/> The state directly carries out all activities (No Partnerships)		
<input type="checkbox"/> The state partially carries out some activities		
<input checked="" type="checkbox"/> CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds) 5		
<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 type="checkbox"/> National technical assistance provider(s)		
<input checked="" type="checkbox"/> Individual consultant(s)		

<input type="checkbox"/>	Tribes and Tribal Organizations
<input checked="" type="checkbox"/>	Other The State may carry out some activities directly.
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>	
Based upon conversation with the state association and eligible entities, the State is making no adjustments to process for FFY2026 and will continue to make remainder funds available to eligible entities and the Vermont Community Action Partnership (state association) and to work with the association and entities to plan and implement training and technical assistance.	

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	Technical Assistance	Reporting	
2	All quarters	Technical Assistance	ROMA	
3	FY1-Q4	Training	Reporting	
4	Ongoing / Multiple Quarters	Both	Organizational Standards - General	
5	Ongoing / Multiple Quarters	Both	Organizational Standards for eligible entities with unmet TAPs and QIPs	
6	Ongoing / Multiple Quarters	Both	Other	community-level work; program alignment and efficiency
7	Ongoing / Multiple Quarters	Training	Other	promising and evidence-based practices in ending poverty

Training and Technical Assistance - Year Two

	Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
1				

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	\$101,096	Year Two	\$0
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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 will continue to work with the association and entities to plan and implement training and technical assistance. The Office of Economic Opportunity is in weekly, if not daily, communication with staff and leadership of Eligible Entities and meets monthly with the State Association. Training is always a topic of conversation during meetings, calls, and site visits. OEO actively participates in and collaborates on the planning and creation of the joint T&TA plan with the Vermont Community Action Partnership.

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. The eligible entities in Vermont have made progress in meeting the Organizational Standards and are building these requirements into their ongoing management practices. Resource and peer sharing have been very effective at helping organizations fully implement the standards. OEO provides additional technical assistance 1:1 with eligible entities as needed.

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.]*

<input type="checkbox"/>	All T/TA is conducted by the state
<input checked="" type="checkbox"/>	CSBG eligible entities (<i>if checked, provide the expected number of CSBG eligible entities to receive funds</i>) 5
<input 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 checked="" type="checkbox"/>	Other The State will provide some Training and Technical Assistance directly.

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

Based on the analysis of past performance and feedback from eligible entities (positive), the State has not adjusted the training and technical assistance plan under this State Plan (8.1) as compared to past plans. The Vermont Community Action Partnership (state association) and the State continue an ongoing partnership approach to support new opportunities to meet training and technical assistance needs of eligible entities. And while the content may vary year to year, the overall plan and process remains the same. The State will continue to look at eligible entities performance on the organizational standards and monitoring reports to adjust specific training and technical assistance activities for the year. The State will continue to work closely with eligible entities and the Vermont Community Action Partnership (state association) to develop and implement joint training and/or technical assistance activities.

Section 9: State Linkages and Communication

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

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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 and 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

The State Office of Economic Opportunity coordinates with other State Offices to create or maintain access for Vermonters with low-income and communities to a variety of services and to avoid duplication of services. The State Office of Economic Opportunity is also the State Weatherization Office and administers federal homeless assistance funds. In addition, the State Office is a division within the Department for Children and Families which includes the State Offices for LIHEAP, TANF, Head Start, Child Welfare, and SNAP. The State Office Administering LIHEAP provides funds to the State CSBG Office, which in turn awards funds to Community Action Agencies to provide outreach services to potential home energy assistance recipients, thus ensuring coordination between anti-poverty programs. In addition, the State Office coordinates and convenes various task forces and working groups to ensure communication among eligible entities and other State and local service providers. These include: homelessness, housing and asset development. The State Office also participates in a number of inter and intra-Agency groups and initiatives which include various offices such as a housing program for families served by the child welfare office, coordination with the State Agency of Education homeless liaison office, participation in the State Consolidated Plan for Housing, trauma-informed care, the intersection of homelessness and health, financial capability integration with state programs, and more.

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.

The State Office of Economic Opportunity actively participates in both Vermont's Homeless Continuum of Care to assure the effective delivery of CSBG services to people and communities with low-income, and to avoid duplication of services. As administrator of federal and state funds for homeless assistance, the State Office also works in direct partnership with local homeless service agencies. The State of Vermont does not have county government; the Agency of Human Services (AHS) employs Field Service Directors in each of the 12 AHS districts. The Field Service Division explicitly seeks to maximize the effectiveness of the human services system in each district of the state and support human services integration within State government and with community partners. The State CSBG Office works in partnership with the Field Services Division and eligible entities to support local linkages and coordination, especially antipoverty and housing programs.

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 Office of Economic Opportunity has developed a Request for Work Plan package that is distributed to all eligible entities. The Request for Work Plan outlines broad goals and the general activities allowed under the Act and require detailed sub-grantee responses which delineate specific activities to

be undertaken by the sub-grantees in their efforts to achieve the purposes of the Act. The Request for Work Plan is submitted annually before the beginning of the grant year. The FY 2025 Request for Work Plan package is submitted as an attachment to the State Plan. The Request for Work Plan requires eligible entities to describe how they will coordinate and establish linkages to assure the effective delivery of and coordination of CSBG services as required by Section 676(b)(5) of the CSBG Act. Section G of the workplan (attached) includes acknowledgement of this responsibility by the Community Action Agency Executive Director. This is also reviewed during the triennial onsite monitoring as well as part of the desk top monitoring that is done throughout frequent interactions during the course of the year (monthly meetings with VCAP, participation in community based meetings, annual close out process, and more).

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.

Eligible entities will make linkages through the development or furthering of connections to organizations and institutions across sectors (e.g., business, health care, faith-based organizations, human services, transportation, etc.) when conducting their work. This includes - but is not limited to - making those linkages when developing programs, providing services, making referrals within and across networks of care, and participating in local and statewide meetings and collaborations. The Request for Work Plan package requires eligible entities to describe how they will develop linkages to fill identified gaps in services and fully meet Section 676(b)(3)(B) of the CSBG Act. Section G of the workplan (attached) includes acknowledgement of this responsibility by the Community Action Agency Executive Director. This is also reviewed during the triennial onsite monitoring as well as part of the desk top monitoring that is done throughout frequent interactions during the course of the year (monthly meetings with VCAP, participation in community based meetings, annual close out process, and more).

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.

CSBG is a required partner of the One-Stop Network. CSBG with the Community Action Agencies as the subrecipients are part of the MOU (attached) that describes the roles and responsibilities of the One-Stop partner programs in the Vermont American Job Center (AJC) Network generally and the Burlington comprehensive AJC specifically. One-Stop is a physical location where job-seekers and employers can access participating programs, services, and activities of all One-Stop partners. In addition to partnering with One-Stop, eligible entities make coordinate employment and training activities through asset-building programs such as microbusiness development, financial coaching, and local training programs to provide hands-on skill building and experience. Section G of the workplan (attached) includes acknowledgement of this responsibility by the Community Action Agency Executive Director. This is also reviewed during the triennial onsite monitoring as well as part of the desk top monitoring that is done throughout frequent interactions during the course of the year (monthly meetings with VCAP, participation in community based meetings, annual close out process, and more).

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.

The State Office Administering LIHEAP provides funds directly to Community Action Agencies to provide administer crisis fuel services and outreach services to potential home energy assistance recipients, thus ensuring coordination between anti-poverty programs and meeting the requirements of Section 676(b)(6) of the CSBG Act. Section G of the workplan (attached) includes acknowledgement of this responsibility by the Community Action Agency Executive Director. This is also reviewed during the triennial onsite monitoring as well as part of the desk top monitoring that is done throughout frequent interactions during the course of the year (monthly meetings with VCAP, participation in community based meetings, annual close out process, and more).

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.

Note: this response will link to the corresponding assurance, item 14.9.

The Request for Work Plan package requires eligible entities to describe how they will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations in order to fully meet Section 676(b)(9) of the CSBG Act. Section G of the workplan (attached) includes acknowledgement of this responsibility by the Community Action Agency Executive Director. This is also reviewed during the triennial onsite monitoring as well as part of the desk top monitoring that is done throughout frequent interactions during the course of the year (monthly meetings with VCAP, participation in community based meetings, annual close out process, and more).

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.

Note: this response will link to the corresponding assurance, item 14.3c.

Eligible entities form partnerships and work with a range of institutions and organizations across Vermont including but not limited to state agencies, hospitals, municipalities and towns, mental health care providers, housing developers, businesses, and other nonprofit service providers. The Request for Work Plan package requires eligible entities to describe how they will coordinate with other public and private resources in order to fully meet Section 676(b)(3)(C) of the CSBG Act. As a part of the Work Plan, eligible entities provide a budget detailing what of the 90 percent funds goes to which components of their overall agency budget. In total, Vermont's eligible entities receive almost \$97 million in federal, state, public, and private resources; CSBG funding helps support and enhance the work those resources fund. Eligible entities use CSBGs funding to support a range of outreach services and program operation. Examples of the work conducted with these resources include: housing assistance, food security initiatives, utility assistance, asset-building and workforce development programs, shelter services, and supports for children and youth.

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.			
<i>Note: This information will pre-populate the Annual Report, Module 1, Item G.5.</i>			
The State Office of Economic Opportunity regularly attends the Vermont Community Action Partnership meetings (State Community Action Association), currently convened monthly by the Partnership. The Vermont Community Action Partnership includes representatives from all five Vermont eligible entities. The State Office also coordinates with the Partnership on training and technical assistance efforts to support eligible entities, including work through the Regional Performance and Innovative Consortia and related to organizational standards.			
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.			
Communication Plan			
Subject Matter	Expected Frequency	Format	Brief description of "Other"
Upcoming Public and/or Legislative Hearings	As needed	Meetings/Presentation	
State Plan Development	Annually	Other	Share draft via email, discuss at State Association meetings.
Organizational Standards Progress	Quarterly	Other	Review as part of quarterly reports and follow up via letter, email, phone, and in meetings as needed.
State Accountability Measures Progress	Upon Request	Other	Will share information when and as requested.
Community Needs Assessments/Community Action Plans	As needed	Meetings/Presentation	
State Monitoring Plans and Policies	As needed	Meetings/Presentation	
Training and Technical Assistance (T/TA) Plans	Quarterly	Other	Check-ins will occur at least quarterly (via email, phone, in person) with more frequent communication as needed.
ROMA and Performance Management	Quarterly	Meetings/Presentation	
State Interagency Coordination	Weekly	Other	Email, phone, ad hoc web-based or in-person meetings.
CSBG Legislative/Programmatic Updates	As needed	Other	Share updates via email as appropriate or discuss at monthly State Association meetings.
Tripartite Board Requirements	As needed	Other	Will provide resources and training as needed via phone, email, or in person.
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.			
<i>Note: This information is associated with State Accountability Measure 5S(iii). and will pre-populate the Annual Report, Module 1, Item G.6</i>			
Within 60 calendar days of receiving feedback from OCS regarding State performance on State Accountability Measures, the State will share this feedback with the Vermont Community Action Partnership (State Association) and its members, which include all eligible entities, at its monthly meeting or by email.			
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.			
<i>Note: This information is associated with State Accountability Measures 7Sb; this response may pre-populate the state's annual report form.</i>			
Based on feedback from eligible entities, the State is not adjusting its communication plan and will continue to maintain strong communication with eligible entities.			

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	BROC - Community Action in Southwest Vermont	No review					
2	Champlain Valley Office of Economic Opportunity (CVOEO)	No review					
3	Capstone Community Action	No review					
4	Northeast Kingdom Community Action (NEKCA)	No review					
5	Southeastern Vermont Community Action (SEVCA)	No 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	BROC - Community Action in Southwest Vermont						
2	Champlain Valley Office of Economic Opportunity (CVOEO)						
3	Capstone Community Action						
4	Northeast Kingdom Community Action (NEKCA)						
5	Southeastern Vermont Community Action (SEVCA)						

10.2. Monitoring Policies:

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

Please see attached Vermont CSBG Plan Addendum.

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.

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.

0

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).
When an eligible entity is on a Quality Improvement Plan as approved by the State Office of Economic Opportunity, the State Office will notify the Office of Community Services Program Specialist for Region 1 in writing within 30 calendar days. The OEO Director and/or Community Services Director will provide that notification which will include the agency in question, the nature of the issue necessitating a QIP, and any identified timeline for completion as appropriate.
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 in Section 678C(b)" per Section 676(b)(8). <input checked="" type="radio"/> Yes <input type="radio"/> 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? <input checked="" type="radio"/> Yes <input type="radio"/> No No
10.8a. New Designation Citation: If yes, provide the citation(s) of the law and/or regulation.
VSA Title 3, Chapter 59, Community Service Agencies http://legislature.vermont.gov/statutes/fullchapter/03/059
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 <input type="radio"/> Yes <input checked="" type="radio"/> No
10.9a. Termination Citation: If yes, provide the citation(s) of the law and/or regulation.
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 Please see attached Vermont CSBG Plan Addendum. Although Vermont's CSBG Plan Addendum is not part of the OCS Model State Plan, it is a part of Vermont's State CSBG Plan submitted for public review/public hearing.
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 type="radio"/> Yes <input checked="" type="radio"/> No
10.10a. If Yes, provide the citation(s) of the law and/or regulation.
10.10b. If No, describe State procedures for re-designation of existing eligible entities. Please see attached Vermont CSBG Plan Addendum.
Fiscal Controls and Audits and Cooperation Assurance
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).
The State financial system and fund accounting procedures provide strict controls that assure the proper disbursement and accounting for funds paid to the State under the Act. Community Action Agencies awarded funds are required to report on the expenditure of funds (including the amounts and purpose of the expenditures) on a monthly basis, thus allowing for ongoing monitoring of the use of the funds. Community Action Agencies are required to conduct an annual, agency-wide audit of all funds, and to submit those audits to the State. Estimated draws occur biweekly for administrative and program expenditures. At the beginning of the quarter, AHS calculates an estimate based on the prior quarters actual expenditures. This amount is divided over the number of draws that will be made during the quarter. Reconciling draws are performed once the reports are completed and included on a quarterly SF-425 report, which the State uses to compare awards, expenditures and draws. When the State determines that they have overdrawn or under drawn federal funds, they perform a reconciling draw to draw in or return the funds.
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.
Note: This information is associated with State Accountability Measure 4Sd.
Any funds made available to the sub-grantees by the State Office of Economic Opportunity from the CSBG will be audited on an annual basis in accordance with the Standards for Audit of Governmental Organizations, Programs, Activities, and Functions, Guidelines for Financial and Compliance Audits of Federally Assisted programs, and OMB Uniform Guidance. All single audits are reviewed by the State Office and the Internal Audit Group at the Agency of Human Services. The Agency of Human Services Internal Audit Group in partnership with the Office of Economic Opportunity performs an assessment of the eligible entities' financial policies and procedures. That includes examining expenditures, payroll, general and administrative costs, and allocations to verify they are properly accounted for, are allowed under the grant agreement, and were used within the period of availability. Notification of management decisions comes from the Internal Audit Group through the Commissioner of Department for Children and Families. For additional information on eligible entity audits, please see attached Vermont CSBG Plan Addendum.
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
Note: This response will link with the corresponding assurance, Item 14.7.
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 checked="" type="radio"/> Yes <input type="radio"/> No
10.13b. Closing Findings Procedures: If no, describe state procedures for permitting and cooperating with federal investigations.

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.

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

In conversation with the state association and eligible entities, the State is not making any adjustments to monitoring procedures at this time as those processes are functioning well.

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** In order to ensure that the board of directors of the Community Action Agencies are constituted in accordance with Section 676B, the Request for Work Plan package to which agencies must respond to receive funds includes a section that requires the names, addresses, and phone numbers of all board members and requires each Community Action Agency to specify the sector each represents (public, private, low-income) as well as the process used to ensure the election of the low-income representatives is in accordance with democratic principles. Additionally, each Community Action Agency is required to denote the offices held and by whom and committee assignments.

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** Contracts with eligible entities for the provision of services require that minutes of the board meetings be submitted to the Office of Economic Opportunity to allow for ongoing monitoring of this requirement. Board rosters must be submitted quarterly and note any changes and the date of vacancies.

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 Request for Work Plan package requires eligible entities to describe how eligible entities allow individuals and organizations to petition for adequate representation on an eligible entities Tripartite Board and fully meet Section 676(b)(10) of the CSBG Act. Section G of the workplan (attached) includes acknowledgement of this responsibility by the Community Action Agency Executive Director. This is also reviewed during the triennial onsite monitoring as well as part of the desk top monitoring that is done throughout frequent interactions during the course of the year, for example, the quarterly review of board roster and board minutes.

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.

Section 4.1 of Vermonts Community Services Block Grant Manual lays out specific policies for program eligibility. This includes direction that income eligibility be calculated on a households gross income (excluding tax refunds) over the past 30 days. That guidance also provides examples of acceptable forms of documentation. The State leaves determination of household composition to the discretion of the eligible entities. Vermont will use the appropriate % of Federal HHS Poverty Guidelines as the standard for determining CSBG income eligibility: 125% Federal Poverty Line (FPL) threshold unless the 200% remains authorized by Congress. This will be calculated based on a households gross income in the past 30 days, excluding tax refunds.

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.

Documentation: Acceptable forms of documentation include: current pay stubs, bank statements or tax documents; or a printout from the States Access system showing financial benefits received. If none of the above are available and it is reasonable to assume the household is income eligible, the Community Action Agency may use a written certification, signed by the client and community action staff, showing the households income in the past thirty days. Tax Refunds Not Counted as Income: The total amount of a tax refund received regardless of whether the refund is the result of a refundable credit, over-withholding, or both is disregarded as income and resources. Self-Employment: Where a member of the household is self-employed, gross revenues clearly tied to a business, and offset by the legitimate operating expenses of that business, shall not be considered household income. However, any personal income earned through self-employment shall be considered part of household income. Programs Funded in Part by CSBG: Where a program is partially funded by CSBG, a proportional share of clients served by the program must meet CSBG eligibility guidelines. Direct Assistance: A household receiving CSBG direct assistance dollars (such as a rental payment to prevent eviction, or a grant to open a small business) must be income eligible at the time of assistance. Their file must contain appropriate documentation. Failure to document eligibility in connection with financial assistance may result in the eligible entity having to repay funds. Eligible entities are required to provide their procedures and processes as a part of the yearly Work Plan submission. That information is reviewed annually by the State Office upon receipt of the plan. Additionally, the State ensures that eligible entities are following income eligibility procedures through monitoring including random case file review and assessment of proportional eligibility during triennial monitoring visits.

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).

Where a program or initiative is partially funded by CSBG, a proportional share of clients served by the program must meet CSBG eligibility guidelines. In the case of community-targeted services, documentation could include county or town-level data from sources such as the census, HUD or the State showing that a proportional share of residents in the targeted geography meets CSBG eligibility.

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.

Please see attached Request for Work Plan.

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

Please see attached Request for Work Plan.

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 Office convenes a quarterly Community Action performance management (ROMA) workgroup with teams from each eligible entity. This group supports the use of National Performance Indicator reports. This includes technical review for uniformity and consistency which leads to more reliable and meaningful comparisons of results across the state and over time. The group also shares effective practices used at each agency to incorporate the performance reports into planning and implementation (i.e., operationalizing the ROMA cycle). The State Office also provides ROMA orientation and training to Community Action staff and boards as needed.

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.

In addition to the workgroup discussed in 13.3, eligible entities are required to file a quarterly report on the National Performance Indicators to the State Office. The annual Work Plan also requires eligible entities to identify which National Performance Indicators they will track and report, with targets.

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 Request for Work Plan (attached) outlines broad goals and the general activities allowed under the Act, and requires detailed sub-grantee responses delineating specific activities to be undertaken by the sub-grantees in their efforts to achieve the purposes of the Act. The Request for Work Plan provides estimates of sub-grantee awards, and contains the following major components, outlined below: Program Design (Mission, Community Assessment); ROMA Implementation Plan (Indicators, Targets, Strategies/Services); Management and Administration (Board structure and composition, Sub-grantees organizational structure, Job descriptions of employees funded with CSBG, Operating procedure by which the sub-grantee identifies eligible clients, Evaluation and control systems); Budget/Financial Management (Line Item Budget, Financial Management Plan); Assurances (Signed assurances relative to activities undertaken and expenditures incurred with CSBG). Responses to the Request for Work Plan will be utilized in the preparation of the State's annual plan and application for funds under the CSBG program. Responses to the Request for Work Plan will be utilized in the preparation of the State's grant agreements with eligible entities for the provisions of services. For this purpose, responses to the Request for Work Plan will be evaluated for technical quality, cost reasonableness and cost effectiveness, as well as for the potential of proposed activities to ameliorate the causes and effects of poverty. Only those proposals which meet all the requirements of the Request for Work Plan will be considered. Once acceptable proposals have been evaluated, representatives of the prospective sub-grantees will be invited to negotiate a grant agreement based on the proposal submitted. The purpose of the negotiations is to arrive at a mutually-agreeable and cost-effective approach to meeting the requirements of the Request for Work Plan and the goals of the program. Once agreement has been reached in regards to program approach and line item budgets, the State Office of Economic Opportunity will award grants.

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.

Each eligible entity is responsible for conducting an assessment of low-income community needs and strengths, establishing service priorities, developing goals and objectives to address the needs identified and prioritized, and build on identified strengths. The State Office of Economic Opportunity recognizes the value of long-term, in-depth planning for the purpose of ensuring the most effective utilization of Federal funds. All eligible entities will be required to submit, as an integral part of their application, a description of the community assessment process within the service area. Further, the State Office of Economic Opportunity perceives the community assessment to be an ongoing process - needs and strengths are constantly being reassessed through the experience of the sub-grantees and the acquisition of new information. A formal assessment serves as a base from which to judge the changing needs of the community. The community assessment report should show not only the problems that can be ameliorated by delivery of services, but problems that pinpoint precisely the major causes of poverty in that area; for example, the absence of an industrial base, seasonal employment, a high percentage of families on minimum wage income, etc. The community assessment report should also identify community strengths, including unique community assets and resources which support specific approaches and partnerships. While the State Office of Economic Opportunity does not expect that each sub-grantee will be able to address all problems that are identified in the community assessment, the State expects that the detailed identification of those problems and community strengths will ensure: the appropriate targeting of resources; enable sub-grantees to design specific plans to address problems which build on community strengths; and ensure that the highest return possible is realized through the expenditure of federal funds. The State Office of Economic Opportunity requires an updated community assessment for each new program year. Please see attached Request for Work Plan.

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;

Vermont CSBG 675C(a) funds will be distributed to five eligible Community Action Agencies, which provide services in all fourteen counties in Vermont. These entities, in accordance with their statutory designation, are considered by the State of Vermont to be the lead anti-poverty organization for each of their respective services areas. The State describes the eligible entities in Section 5, CSBG Eligible Entities. The State further meets the requirements of 676(b)(3)(A) through the Request for Work Plan process previously described. Please see attached Request for Work Plan As a part of the Work Plan, Eligible entities are required to include descriptions of their organizational structure (including physical and mobile offices); organizational divisions, departments, units, programs as relevant; staffing patterns; operating procedures including eligibility determination and intake procedures; participant feedback and quality assurance processes; policies and procedures for ensuring non-discrimination, affirmative outreach, and access; and assurances of provision of case management and follow-up . Additionally, the service delivery system (service area, locations, accessibility, intake processes, etc.) of each agency is reviewed as part of the triennial monitoring process.

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 assures that funds meet the requirements of 676(b)(1)(B) through the Request for Work Plan process previously described. Please see attached Request for Work Plan. This is also reviewed during the triennial onsite monitoring as well as part of the desk top monitoring that is done throughout frequent interactions during the course of the year (monthly meetings with VCAP, participation in community based meetings, annual close out process, and more).

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)

The State assures that funds meet the requirements of 676(b)(1) (C) through the Request for Work Plan process previously described. Please see

attached Request for Work Plan. This is also reviewed during the triennial onsite monitoring as well as part of the desk top monitoring that is done throughout frequent interactions during the course of the year (monthly meetings with VCAP, participation in community based meetings, annual close out process, and more).

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."

Note: The State describes this assurance under "State Use of Funds: Remainder/Discretionary," items 7.9 and 7.10

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;

Vermont CSBG 675C(a) funds will be distributed to five eligible Community Action Agencies, which provide services in all fourteen counties in Vermont. These entities, in accordance with their statutory designation, are considered by the State of Vermont to be the lead anti-poverty organization for each of their respective services areas. The State describes the eligible entities in Section 5, CSBG Eligible Entities. The State further meets the requirements of 676(b)(3)(A) through the Request for Work Plan process previously described. Please see attached Request for Work Plan As a part of the Work Plan, Eligible entities are required to include descriptions of their organizational structure (including physical and mobile offices); organizational divisions, departments, units, programs as relevant; staffing patterns; operating procedures including eligibility determination and intake procedures; participant feedback and quality assurance processes; policies and procedures for ensuring non-discrimination, affirmative outreach, and access; and assurances of provision of case management and follow-up. Additionally, the service delivery system (service area, locations, accessibility, intake processes, etc.) of each agency is reviewed as part of the triennial monitoring process. Eligible entities provide a range of services through case management services, administration of programs, provision of coaching, referrals to appropriate resources, direct assistance, and other systems of support. These services are provided in main offices, satellite offices in outlying communities, outreach activities, and in coordination with other community settings. Eligible entities provide translation and interpretations services and other appropriate accommodations as appropriate.

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."

Note: The state describes this assurance in the state linkages and communication section, item 9.3b.

Eligible entities will make linkages through the development or furthering of connections to organizations and institutions across sectors (e.g., business, health care, faith-based organizations, human services, transportation, etc.) when conducting their work. This includes - but is not limited to - making those linkages when developing programs, providing services, making referrals within and across networks of care, and participating in local and statewide meetings and collaborations. The Request for Work Plan package requires eligible entities to describe how they will develop linkages to fill identified gaps in services and fully meet Section 676(b)(3)(B) of the CSBG Act. Section G of the workplan (attached) includes acknowledgement of this responsibility by the Community Action Agency Executive Director. This is also reviewed during the triennial onsite monitoring as well as part of the desk top monitoring that is done throughout frequent interactions during the course of the year (monthly meetings with VCAP, participation in community based meetings, annual close out process, and more).

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."

Note: The state describes this assurance in the state linkages and communication section, item 9.7.

Eligible entities form partnerships and work with a range of institutions and organizations across Vermont including but not limited to state agencies, hospitals, municipalities and towns, mental health care providers, housing developers, businesses, and other nonprofit service providers. The Request for Work Plan package requires eligible entities to describe how they will coordinate with other public and private resources in order to fully meet Section 676(b)(3)(C) of the CSBG Act. As a part of the Work Plan, eligible entities provide a budget detailing what of the 90 percent funds goes to which components of their overall agency budget. In total, Vermont's eligible entities receive almost \$97 million in federal, state, public, and private resources; CSBG funding helps support and enhance the work those resources fund. Eligible entities use CSBG funding to support a range of outreach services and program operation. Examples of the work conducted with these resources include: housing assistance, food security initiatives, utility assistance, asset-building and workforce development programs, shelter services, and supports for children and youth.

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."

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).

Section G of the workplan (attached) includes acknowledgement of this responsibility by the Community Action Agency Executive Director. This is also reviewed during the triennial onsite monitoring as well as part of the desk top monitoring that is done throughout frequent interactions during the course of the year (monthly meetings with VCAP, participation in community-based meetings, annual close out process, and more). The Work Plan also requires eligible entities to explain the ways in which the Community Needs Assessment results tie into and inform the specific and strategic implementation of programs to strengthen households and communities. An example of a current innovative community initiative generated by the

Community Needs Assessment includes one eligible entity's creation of a food hub and market to expand its food access network and enhancing traditional food shelf operations by leveraging a partnership with a grassroots organization working with local farms to glean food.

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 State assures that funds meet the requirements of 676(b)(4) through the Request for Work Plan process previously described. Please see attached Request for Work Plan. Section G of the workplan (attached) includes acknowledgement of this responsibility by the Community Action Agency Executive Director. This is also reviewed during the triennial onsite monitoring as well as part of the desk top monitoring that is done throughout frequent interactions during the course of the year (monthly meetings with VCAP, participation in community based meetings, annual close out process, and more).

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."

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.

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."

Note: The state describes this assurance in the state linkages and communication section, items 9.2 and 9.5.

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

Note: The state addresses this assurance in the Fiscal Controls and Monitoring section, item 10.13.

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

Note: The state addresses this assurance in the Fiscal Controls and Monitoring section, item 10.7.

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."

Note: The state describes this assurance in the state Linkages and Communication section, item 9.6.

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."

Note: The state describes this assurance in the Eligible Entity Tripartite Board section, 11.3.

The Request for Work Plan package requires eligible entities to describe how eligible entities allow individuals and organizations to petition for adequate representation on an eligible entities Tripartite Board and fully meet Section 676(b)(10) of the CSBG Act. Section G of the workplan (attached) includes acknowledgement of this responsibility by the Community Action Agency Executive Director. This is also reviewed during the triennial onsite monitoring as well as part of the desk top monitoring that is done throughout frequent interactions during the course of the year, for example, the quarterly review of board roster and board minutes.

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."

Note: The state describes this assurance in the ROMA section, items 13.5 and 13.6.

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)

Form Approved
OMB No:0970-0382
Expires:08/31/2027

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.