Janet T. Mills Governor

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# DRAFT

# COMMUNITY SERVICES BLOCK GRANT

STATE PLAN & APPLICATION FISCAL YEARS 2024-2025

> 2 ANTHONY AVENUE STATE HOUSE STATION #11 AUGUSTA, MAINE 04333-011

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# SECTION 1 CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter

## 1.1. Lead Agency designated to administer CSBG in the State

as required by Section 676(a) of the Act. The following information should mirror the information provided in the SF-424M.

- 1.1a Agency Name
- 1.1b Identify the cabinet or
- 1.1c Name the division, bureau, or
- 1.1d Authorized Official of Lead Agency
- 1.1e Street Address
- 1.1f City
- 1.1g State
- 1.1h Zip
- 1.1i Telephone Number and Extension
- 1.1j Fax Number
- 1.1k Email Address
- 1.1l Website

#### 1.2 DESIGNATED STATE CSBG CONTACT

- 1.2a Agency Name
- 1.2b Point of Contact
- 1.2c Street Address
- 1.2d City
- 1.2e State
- 1.2f Zip
- 1.2g Point of Contact Telephone
- 1.2h Point of Contact Fax Number
- 1.2i Point of Contact Email Address
- 1.2j Point of Contact agency website
- 1.3

Please attach the State's official designation letter.

Maine Department of Health and Human Services Office of Child and Family Services

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See Attachment 1 Designation Letter

# SECTION 2 State Legislation and Regulation

2.1	<b>CSBG State Legislation</b> Does the State have a statute authorizing CSBG?	⊠Yes [	∃No
2.2	CSBG State Regulation Does the State have regulations for	⊠Yes	□No
2.3	Attach a copy (or copies) of legislation and/or regulations, as appropriate.		
	[http://legislature.maine.gov/statutes/22/title22ch1477sec0.ht ml https://www.maine.gov/sos/cec/rules/10/144/144c002.doc]		
2.4	<b>State Authority:</b> Please select a response for each question abo statute and/or regulations authorizing CSBG:	ut the St	ate
2.4a	Did the State legislature enact authorizing legislation, or amendments to an existing authorizing statute, last year?	□Yes 🛛	⊠No
2.4b	Did the State establish or amend regulations for CSBG last year?	′□Yes I	⊠No
2.4c	Does the State statutory or regulatory authority designate the bureau, division, or office in the State government that is to be the State administering agency?	⊠Yes	□No

# SECTION 3 State Plan Development and Statewide Vision and Goals

#### 3.1. CSBG Lead Agency Mission and Responsibilities:

#### Narrative:

The mission of the Maine Department of Health and Human Services (the Department or DHHS) is promoting health, safety, resilience, and opportunity for Maine people. DHHS provides health and social services to approximately a third of the State's population, including children, families, older Mainers, and individuals with disabilities, mental illness, and substance use disorders.

# **3.2** State Plan Goals: Describe the state's CSBG-specific goals for state administration of CSBG under this State Plan.

#### Narrative:

DHHS, in collaboration with the Community Services Block Grant (CSBG), The Community Action Network, and their surrounding community partners, work together for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient. The purpose of CSBG is (1) to provide services and activities having a measurable and potential major impact on causes 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 low-income participants, including the elderly poor; (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; and (4) to coordinate and establish linkages between governmental and other social services programs to assure the effective delivery of such services to low-income individuals, is to provide temporary support and assistance to low-income families and individuals while helping them maximize their potential for economic security and self-sufficiency.

The following goals for individuals, families, and community development have been adopted by the local eligible entities and supported by the State CSBG Office as necessary to advance the objectives of the CSBG program:

- 1. Securing and Maintaining Employment;
- 2. Securing Adequate Education;
- 3. Improving Income Management;
- 4. Securing Adequate Housing;
- 5. Providing Emergency Services;
- 6. Improving Nutrition;

- 7. Creating Linkages Among Anti-Poverty Programs; and
- 8. Achieving Self-Sufficiency.

The Department of Human Services' Community Services Block Grant (CSBG) specific goals for State administration of CSBG under this State Plan are as follows:

**Goal 1.** The CSBG Program will be administered in compliance with the applicable federal and state statutes, as well as Department rules and regulations.

**Objective 1:** CSBG funds will be distributed in accordance with applicable federal and state statutes and formulas.

#### Activities:

- Funds will be made available to the eligible entities within 30 calendar days after Federal and State authority is provided.
- Payments will be made as provided by the contract agreement.
- **Objective 2:** Eligible entities will be monitored in compliance with the requirements of the CSBG Act.

#### Activities:

- A comprehensive on-site review will be conducted at least every three years to include the COE organizational standards which encompass additional required state indicators and best practices. Assessment of the organizational standards will be conducted annually per the assessment procedures.
- A written report will be provided to the eligible entities within 60 days of completion.
- Training and technical assistance will be provided as needed, to address identified deficiencies/needs.

**Goal 2.** The CSBG State Office will secure continuation of funds and ensure the delivery of comprehensive services and activities to assist low-income individuals, children, and families to move out of poverty.

- **Objective 1:** The CSBG State Office will complete and submit the application for Federal funds.
- **Objective 2:** The CSBG State Office will perform activities to promote the successful results of CSBG-funded program.

#### Activities:

- The CSBG State Office will partner with governmental and public and private organizations to coordinate and promote the effective delivery of services to Maine individuals and families with low incomes.
- The CSBG State Office will contract with Maine's Community Action Association to collaborate, plan, and implement training and technical assistance to the state's eligible entities, as needed, to support achievement of greater organizational standard compliance and understanding and other appropriate topics needed to strengthen its capacity to provide services.
- **Objective 3:** The CSBG State Office will ensure documentation of the use and impact of CSBG funds across all agency programs regardless of funding source.

## Activities:

- The Eligible Entities will prepare and submit a CSBG annual report documenting use of funds and the impact of CSBG funds across all agency programs regardless of the funding source and the National Performance Indicator (NPIs) outcomes achieved.
- The CSBG State office will prepare and submit the Annual Report to the Office of Community Services via Grant Solutions on time.
- **3.3. State Plan Development:** Indicate the information and input the State accessed to develop this State Plan.
- 3.3 a. Analysis of [Check all that applies and add narrative where applicable]
   ☑ State National Performance Indicators (NPIs)
  - 🗷 U.S. Census data
  - State performance management data (e.g., accountability measures, other information from annual reports)
  - 🗷 Other data Annual Information Survey Report, Monitoring Reports
  - Eligible entity community assessments
  - Eligible entity plans
  - □ Other information from eligible entities, e.g., State required reports (please describe)
- 3.3 b. Consultation with [Check all that applies and add narrative where applicable]
  - Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)
  - State community action association and regional CSBG T & TA providers
  - □ State partners and/or stakeholders (please describe)
  - National organizations (please describe)
  - □ Federal Office of Community Services

Other (please describe)

#### 3.4. Eligible Entity Involvement

**3.4a.** Describe the specific steps the State took in developing the State Plan to involve the eligible entities.

**Narrative:** On June 9, 2021, the State provided a drafted outline of the State Plan to the eligible entity network and the State Community Action Association. A meeting was held on June 16, 2021, to receive input on the plan; no comments or suggestions were provided for discussion. Maine's CSBG Eligible Entity Network was supportive of the draft and voted for final acceptance.

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

**3.4b. Performance Management Adjustment**: How has the State adjusted State Plan development procedures under this State Plan, as compared to past plans, in order 1. to encourage eligible entity participation and 2. to 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. If the State is not making any adjustments, please explain.

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

**Narrative:** In 2021, Maine's ACSI score entered the nation's first quartile of scores with an overall Customer Satisfaction score of 87, which is a 16-point increase over the prior survey in 2019. Maine has utilized the ACSI feedback as its intended, placing effort into improving areas of opportunities while maintaining the areas with high satisfaction. One of those areas included State Plan development. In 2015, Maine scored 27 in overall satisfaction with Development of the State Plan, and in 2021, Maine scored an overall 71% satisfaction with every agency responded to the ACSI. Of the feedback provided, many agencies wrote statements that supported that the State Office had provided ample opportunities for feedback, development, and input to the State Plan. Even so, Maine intends to embark on a new State Plan development process starting in 2022. In May 2022, The CSBG State Office will recruit interest in a State Plan Development Task Force, in which Maine's entire CSBG Network, will receive an invite. Task force members will work monthly to overhaul Maine's CSBG State Plan for preparation of the 2024-2025 State Plan submission in September 2023.

# 3.5. Eligible Entity Overall Satisfaction:

Year One: 89 Year Two: 89 **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. (See information about the ACSI in the CSBG State Accountability Measures document.)

**Note:** Item 3.5 is associated with State Accountability Measure 8S and may prepopulate the State's annual report form.

## **SECTION 4 CSBG Hearing Requirements**

## 4.1. Public Inspection:

**Narrative:** The Draft Application and State Plan was made available for review on 7/31/2023. The State held a public hearing at the Office of Child and Family Services on 8/9/2023. The Draft Application and State Plan are also on the Department's website. A link to the website posting was published in the Kennebec Journal on 8/7/2023 through 8/9/2023. The 10 Maine Community Action Agencies and Maine Community Action Partnership were sent the CSBG Draft Application and State Plan on 7/31/2023.

# 4.2. Public and Legislative Hearings: Narrative:

Throughout the last year, the State has worked with CSBG Eligible Entities, the State Association, and other partners as we've moved forward towards development of a plan. This work started in February 2023. In addition, the draft plan was sent out July 31, 2023. This allowed for public comment to be considered, answered, and applicable changes made. The Department continually engages Eligible Entities) via joint meetings with the State CSBG Office, CAAs, State Community Action Association, and Program Staff).

#### 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.

**Note:** Please note the date(s) for the public hearing(s) must have occurred in the year prior to the first Federal fiscal year covered by this plan. Legislative hearings are held at least every three years and must have occurred within the last three years prior to the first Federal Fiscal Year covered by this plan.

Date	Location	Type of Hearing
8/9/2023		Public
	Maine State House, 210 State St, Room #, Augusta Maine	Legislative

**4.4.** Attach supporting documentation for the public and legislative hearings. See Attachment 2: Supporting Documentation for the Public and Legislative Hearings

# SECTION 5 CSBG Eligible Entities

# 5.1. CSBG Eligible Entities:

CSBG Eligible Entity	Public or Nonprofit	Geographical Area Served by county (Provide all counties)	Type of Entity (choose all that apply)
Aroostook County Action Program	Nonprofit	Aroostook, Washington, and Northern Penobscot Counties	Community Action Agency
Community Concepts, Inc	Nonprofit	Androscoggin, Oxford, Franklin Cumberland (Lead and Home Repair), Kennebec (Lead) Sagadahoc (Lead), Somerset (Lead), and York (Lead) Counties	Community Action Agency
Kennebec Valley Community Action Program	Nonprofit	Kennebec, Somerset, Lincoln, and Sagadahoc Counties	Community Action Agency
Penquis C.A.P, Inc.	Nonprofit	Penobscot, Piscataquis, and Knox Counties	Community Action Agency
The Opportunity Alliance	Nonprofit	Cumberland County	Community Action Agency
Waldo Community Action Partners	Nonprofit	Waldo County	Community Action Agency
Western Maine Community Action, Inc.	Nonprofit	Franklin, Oxford, and Androscoggin Counties	Community Action Agency
York County Community Action Corporation	Nonprofit	York County	Community Action Agency
Downeast Community Partners	Nonprofit	Washington and Hancock Counties	Community Action Agency
Midcoast Maine Community Action	Nonprofit	Sagadahoc, Lincoln, Knox, Waldo, and Cumberland Counties	Community Action Agency

- **5.2** Total number of CSBG eligible entities: <u>10</u>
- **5.3** Changes to Eligible Entities list: Has the list of eligible entities under item 5.1 changed since the State's last State Plan submission? If yes, please briefly describe the changes.

🗷 Yes 🛛 No

Changes to the Geographical Area to better reflect the service areas that agencies cover outside of the CSBG formula boundaries.

- 5.3b Designation and Voluntary Relinquishments: N/A
- 5.3c Mergers: N/A

# 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 <u>HERE</u> for IM 138.

# 6.1. Choice of Standards:

- The State will use the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138)
- □ The State will use an alternative set of organizational standards [Provide supporting documentation if this option is selected]
- 6.1 a If the State is using the COE-developed organizational standards, does the State propose making a minor modification to the standards, as described in IM 138?
   ☑ Yes
   ☑ No
- **6.1b** If yes was selected in item 6.2, describe the State's proposed minor modification to the COE- developed organizational standards, and provide a rationale.

The Maine CSBG State Office has implemented a guidance manual that include the COE Organizational Standard Guidance as well as is inclusive of enhanced evaluation practices of the state indicators and best practices in our manual

- 6.2. How will/has the State officially adopt(ed) organizational standards for eligible entities in the State? If "Other" is selected, please provide a timeline and additional information, as necessary.
   [Check all that apply]
  - □ Regulation
  - □ Policy
  - Contracts with eligible entities
  - □ Other, describe
- **6.3.** How will the State assess eligible entities against organizational standards, as described in IM 138? [Check all that applies]
  - 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

#### 6.4a. Describe the assessment process.

#### Narrative:

CSBG Eligible Entities are required per contract to review and complete an annual self -assessment in regard to performance of the Organizational Standards, which include additional State Indicators and best practices. This evaluation is due by September 1<sup>st</sup> every calendar year. Eligible Entities must submit Organizational Standard Self- Assessment with supporting documents to the Department via CSBG Reporter. Documents will reflect how Eligible Entities meet each Organizational Standard. The Department has encouraged Maine's Eligible Entities to work on this assessment through out the Federal Fiscal Year to ensure that the self-assessment is conducted over time, and the organizational standards become practice, and not an assessment stood in time. The CSBG State Office staff will perform at minimum, quarterly desk reviews of the documents submitted in through completion of an instrument created by the Department with considerable input from the National Community Action Partnership tools, that will assist the CSBG State Office in assessing and determining the accuracy of the Eligible Entities' self-assessment. Feedback will be provided from the CSBG State Office in a timely manner in order to reduce workload towards the end of the Federal Fiscal Year for all parties when the assessment is due to be completed by Eligible Entities in full by September 1<sup>st</sup>. By September 30, The CSBG State Office will provide a report reflecting the level of performance the Eligible Entity has achieved in regards to the organizational standards. Follow-up engagement will occur and may include an on-site monitoring visit when the desk review identifies regulations and organizational standards that were substantially out of compliance, placing an entity at risk. Once the CSBG State Office and the Eligible Entities come to agreement, the assessment will be locked. A new assessment can be opened as soon as Oct 1 of the following year to continue on this assessment cycle.

Reports will be submitted to the Eligible Entity within 60 days of completion of the CSBG State Office review of the assessment. If a standard or standards has/have not been met, the CSBG State Office will clearly communicate the specific deficiency and the requirement for correction action. Where determined appropriate, to support the eligible entity in meeting the standard(s), the CSBG State Office will offer training and technical assistance or require the eligible entity to submit a Continuous Improvement Plan (CIP). The CSBG State Office will monitor the Eligible Entity's progress toward meeting the standard(s). As long as progress is being made, the CSBG State Office will continue to monitor and support the Eligible Entity in meeting the standard(s). Within 30 days of receiving documentation that the standard(s) has/have been met, the CSBG State Office will provide written notification of closure of finding(s).

Where significant deficiencies are not corrected within a designated timeframe or there are serious systemic issues, the CSBG State Office will make a determination

of the necessity to pursue creation of a Technical Assistance Plan (TAP), Quality Improvement Plan (QIP), or reduction or termination of funding per 678C of the CSBG Act and guidance provided by CSBG IM 116.

6.4. Will the State make exceptions in applying the organizational standards for any eligible entities due to special circumstances or organizational characteristics, as described in IM 138? □ Yes

🗵 No

6.4a. If yes was selected in item 6.5, list the specific eligible entities the State will exempt from meeting organizational standards, and provide a description and a justification for each exemption.

- 6.5 Performance Target: What percentage of assessed eligible entities in the State does the State expect will meet the State-adopted organizational standards in the next year? [80%]
- **Note:** This information is associated with State Accountability Measures 6Sa and may pre-populate the State's annual report form.

## SECTION 7 State Use of Funds

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

- **7.1** Formula: Please select the method (formula) that best describes the current practice for allocating CSBG funds to eligible entities.
  - 🗷 Historic
  - □ Base + Formula
  - □ Formula Alone
  - □ Formula with Variables
  - □ Hold Harmless + Formula
  - □ Other
- **7.1a.** Does the State statutory or regulatory authority specify the terms or formula for allocating the 90 percent funds among eligible entities?
  - 🗷 Yes
  - 🗆 No

#### Narrative:

The State complies with the requirements of the CSBG Act.

**7.2. Planned Allocation:** Specify the planned allocation of 90 percent funds to eligible entities, as described under Section 675C(a) of the CSBG Act. The estimated allocations may be in dollars or percentages. For each eligible entity receiving funds, provide the Funding Amount in either dollars (columns 2 and 4) or percentage (columns 3 and 5) for the fiscal years covered by this plan.

	Planned CSBG 90 Percent Funds					
CSBG	Year One					
Eligible						
Entity	Funding Amount	Funding Amount	Funding Amount	Funding Amount		
	\$ 3,853,294.00	90%	\$ 3,853,294.00	90%		
ACAP	337,7	79.75	337,77	79.75		
CCI	413,2	07.98	413,207.98			
DCP	327,549.26		327,549.26			
KVCAP	414,9	41.96	414,941.96			
MMCA	273,7	95.81	273,795.81			
Penquis	504,9	35.65	504,935.65			
TOA	A 392,920.39 392,920.39		20.39			
WCAP	243,277.72		CAP 243,277.72 243,277.72		77.72	
WMCA	231,833.43		ACA 231,833.43 231,833.43		33.43	
YCCAC	327,722.62		CAC 327,722.62 327,722.62		22.62	
Total	\$ 3,467	,964.60	\$ 3,467,	964.60		

**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).

# Narrative:

The Department utilizes a historical formula to distribute funds to the State's 10 Eligible Entities.

• The State allocates 90% of the grant to the Maine's Eligible Entities Fifty percent of the amount passed through is divided equally among all Eligible Entities. 50% of the amount passed through is divided among all Eligible Entities based on each entities' percentage of the State's low-income households.

The Eligible Entity shall receive payment(s) for its approved budget in accordance with the following payment procedures:

- Upon receipt of the Notice of Award (NOA) from DHHS and completion of the grant agreement and approval process, CSBG funding is made available to the Eligible Entity.
- The State utilizes a monthly payment methodology; entities receive 1/12<sup>th</sup> of the total contract amount on a monthly basis. The agency is to submit quarterly financial statements, showing actual expenditures during the quarter. This report is due within thirty (30) days after the close of a quarter, except for the last quarter of the contract, which allows the reports to be due within 60 days after the close of the agreement.
- Financial statements, expenditures, and other performance reports are reviewed and processed.
- The Eligible Entity may receive a payment adjustment during the 5<sup>th</sup>, 8<sup>th</sup>, and 11<sup>th</sup> month, as well as the closeout, due to an adjustment based on the quarterly financial statements. If an Eligible Entity, underspent during the first quarter, the 5<sup>th</sup> payment may be adjusted with a decrease. If an agency spent more than what was paid to them in the first quarter, the 5<sup>th</sup> payment may be adjusted with an increased to reimburse the agency.
- 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.** 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. Performance Management Adjustment:** How is the State 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.

## Narrative:

Historically, operations processes/systems appear to be working well. However, since the years of COVID, the Department had experienced increased workloads without increase in staffing. Complicated by the continued workforce challenges that are being experienced nationwide, this has resulted in ongoing delayed contract processes. This information is known by the Department but also recognized by the Eligible Entities in the State's ACSI Survey results. The Department is aware and is working to improve these timelines by ensuring to complete programmatic requirements earlier in hopes that the earlier date will allow appropriate time for the other responsible Department's to get contract through the process in time.

**Note:** This information is associated with State Accountability Measure 2Sb and may pre- populate the State's annual report form.

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

**7.6.** What amount of State CSBG funds does the State plan to allocate for administrative activities, under this State Plan? The estimate may be in dollars or a percentage.

[Numeric response, specify \$ or %] 5%

- 7.7. How many State staff positions will be funded in whole or in part with CSBG funds under this State Plan?
   [Insert a number between 0 99]
   1.5
- 7.8. How many State Full Time Equivalents (FTEs) will be funded with CSBG funds under this State Plan?
   [Insert a number between 0 99]
   1.5

# **Remainder/Discretionary Funds** [Section 675C(b) of the CSBG Act]

7.9. Does the State have remainder/discretionary funds?☑ Yes □ No

If yes was selected, describe how the State plans to use remainder/discretionary funds in the table below.

**Note**: This response will link to the corresponding assurance, item 14.2.

**Note:** This information is associated with State Accountability Measures 3Sa; the responses may pre-populate the State's annual report form.

Remainder/ Discretionary	Year One	Year Two	
<b>Fund Uses</b> (See 675C(b)(1) of the CSBG Act)	Planned \$ 192,664.70	Planned \$ 192,664.70	Brief Description of Services/ Activities
a. Training/technical assistance to eligible entities	\$67,965	\$67,965	These planned services/activities will be described in State Plan item 8.1
<ul> <li>b. Coordination of State- operated programs and/or local programs</li> </ul>			
c. Statewide coordination and communication among eligible entities	\$65,220	\$65,220	The State is continuing to contract with the Maine Community Action Partnership regarding a statewide data system, EmpowOR, to move Maine toward an unduplicated count and better able to develop programs to enhance services across the State of Maine, as well as streamline state and federal reporting requirements and provide stronger state office oversight.
d. Analysis of distribution of CSBG funds to determine if targeting greatest need			
e. Asset-building programs			
f. Innovative programs/ activities by eligible entities or other neighborhood groups g. State charity tax credits			

h. Other activities, specify	\$59,479	\$59,479	State Association Administrative Costs
Totals	192,664.70	192,664.70	

- **7.10.** What types of organizations, if any, does the State plan 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]
  - □ CSBG eligible entities
  - □ Other community-based organizations
  - State Community Action association
  - □ Regional CSBG technical assistance provider(s)
  - □ National technical assistance provider(s)
  - □ Individual consultant(s)
  - □ Tribes and Tribal Organizations
  - □ Other
  - □ None (the State will carry out activities directly)

Note: This response will link to the corresponding CSBG assurance, item 14.2.

**7.11. Performance Management Adjustment:** How is the State adjusting 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.

**Narrative:** The State is continuing to contract with the Maine Community Action Partnership regarding a statewide data system, EmpowOR, to move Maine toward an unduplicated count and better able to develop programs to enhance services across the State of Maine, as well as streamline state and federal reporting requirements and provide stronger CSBG State Office oversight.

These efforts continue to be supported as Eligible Entities work through process change both on the frontlines and at the management level, to have the ability to continue to improve the database to meet specific and unique agency needs, and is a considerable financial support to the agencies to have access to these funds to support this initiative without impacting their contract CSBG budget. This is a statewide project, and the Department continue to support the development of this database, as it will only continue to improve data collection, accuracy, and reporting processes for not only CSBG but many Eligible Entity programs.

**Note:** This information is associated with State Accountability Measures 3Sb, and will pre-populate the State's annual report form

# SECTION 8 State Training and Technical Assistance Plan

8.1. 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. Add a row for each activity: indicate the timeframe; whether it is training, technical assistance or both; and the topic. (CSBG funding used for this activity is referenced under item 7.9(a), Use of Remainder/Discretionary Funds.)

**Note:** This information is associated with State Accountability Measures 3Sc; this response may pre-populate the State's annual report form.

Training and Technical Assistance					
Fiscal Year (Y) Quarter (Q) / Timeframe	Training, Technical Assistance, or Both	Торіс	Brief Description of "Other"		
Dropdown options:	Toggle Options:	Dropdown Options:			
□ FY1-Q1	□ Training	⊠Fiscal	If "Other" is		
□ FY1 – Q2	Technical Assistance	⊠Governance/	selected in column		
□ FY1 – Q3	🗵 Both	Tripartite Boards	3, describe in this		
□ FY1 – Q4		Organizational Standards	column		
□ FY2 – Q1		– General	[Narrative, 2500		
□ FY2 – Q2		Organizational Standards	characters]		
□ FY2 – Q3		<ul> <li>for eligible entities with</li> </ul>			
□ FY2 – Q4		unmet standards on			
🗵 Ongoing /		Technical Assistance Plans			
Multiple Quarters		(TAPs) or Quality			
All quarters		Improvement Plans (QIPs)			
		Correcting Significant			
		Deficiencies Among Eligible			
		Entities			
		⊠ Reporting			
		⊠ROMA			
		Community Assessment			
		□ Strategic Planning			
		Monitoring			
		Communication			
		⊠Technology			
		□ Other			

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

Year One:	\$ 192,664.70	Year Two:	\$ 192,664.70
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**8.1 b 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.

#### Narrative:

The CSBG State Office meets regularly with Economic Opportunity Council (EOC), which is comprised of CSBG Staff from each Eligible Entity and Maine Community Action Partnership (State Association) staff to discuss and identify the needs of the network regarding development and implementation of the T/TA plan. The CSBG State Office collaborates and contracts with the State Association for training and technical assistance. The CSBG State Office also consults with its Federal Project Officer, CAPLAW, NASCSP, etc., regarding technical assistance and training opportunities.

8.2. Does the State have in place Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs) for all eligible entities with unmet organizational standards, ifappropriate?

□ Yes ⊠ No

**8.2 a.** Address Unmet Organizational Standards: Describe the state's plan to provide T/TA to eligible entities to ensure they address unmet Organizational Standards.

**Narrative:** Maine has brought national partnerships such as Community Action Program Legal Services, Inc (CAPLAW) and the National Community Action Partnership to the state to provide training and technical assistance to Eligible Entities with already known unmet needs. The CSBG State Office will continue to make these efforts after Organizational Standard Monitoring has been completed at its fullest, and the need is identified. The CSBG State Office utilizes Continuous Improvement Plans (CIP), as a mechanism for improvement prior to utilizing TAP/QIP. TAP/QIP is the following step if deficiencies continue to occur.

The CSBG State Office has created a CSBG Organizational Standard Bootcamp training that is targeted for agencies whose performance has been proven not great, where there have been large staff turnover, or an at an eligible entities' request. This bootcamp is broken into 3 phases to follow the three thematic groups. This allows for the training to be broken into smaller amounts of information each session, which affords the eligible entities to take the information back to their teams and address where they see appropriate. The CSBG State Office has recorded these trainings in a mock series webinar to be posted on the Department website for future resources but will still be open to hosting the bootcamp for individual agencies upon request.

**Note:** 8.2 is associated with State Accountability Measure 6Sb. QIPs are described in Section 678C(a)(4) of the CSBG Act. If the State, according to their corrective action procedures, does not plan to put a QIP in place for an eligible entity with one or more unmet organizational standards, the State should put a TAP in place to support the entity in meeting the standard(s).

**8.3.** 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.)

# [Check all that applies and narrative where applicable]

- □ CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds)
- □ Other community-based organizations
- State Community Action association
- Regional CSBG technical assistance provider(s)

- National technical assistance provider(s)
- Individual consultant(s)
- □ Tribes and Tribal Organizations
- □ Other
- 8.4. Performance Management Adjustment: How is the State adjusting 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.

**Narrative:** Based upon feedback and needs identified through/from the American Customer Satisfaction Index, Regional Performance and Innovation Consortium (RPIC), Economic Opportunity Council (EOC), the State Association, local Eligible Entities, and the Organizational Standards Center of Excellence (OSCOE/COE) Training and Technical Assistance (T/TA) Plan, the State is contracting with the State Association for Training and Technical Assistance, as well as supporting the development and implementation of a statewide data system.

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

# 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-level Linkages and Coordination**: Indicate the linkages and coordination at the State level that the State plans 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 described under 675C(b)(1)(B) and as required by the assurance under Section 676(b)(5) of the CSBG Act. Please attach additional information as needed. (CSBG funding used for this activity is referenced under Item 7.10(b), Use of Remainder/Discretionary Funds). [Check all that apply]
  - State Low Income Home Energy Assistance Program (LIHEAP) office
  - State Weatherization office
  - State Temporary Assistance for Needy Families (TANF) office
  - State Head Start office
  - □ 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

**Note:** This response will pre-populate the corresponding CSBG assurance, item 14.5. In addition, this item is associated with State Accountability Measure 7Sa; this response may pre-populate the State's annual report form.

**9.2.** State Linkages and Coordination at the Local Level: Describe the linkages and coordination at the local level that the State plans to create or maintain with governmental and other social services, especially antipoverty programs, to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by assurances under Sections 676(b)(5) and (b)(6)). Attach additional information as needed.

#### Narrative:

The Department administers the CSBG in a state whose territory is as vast as it is varied. As such, the Department's strategy centers on ensuring local coordination through the local Eligible Entities. The Department requires CSBG Eligible Entities to coordinate funds and services at the local level. The annual community action plan from each Eligible Entity has to describe the Eligible Entities' coordination efforts with city, county, schools, non-profits,

and other local or regional organizations. CSBG Eligible Entities coordinate services and work to avoid duplication of services with other providers, including participating in the statewide Economic Opportunity Council (EOC) which is working to improve Maine's CSBG National Performance Indicator (NPI) outcome results. CSBG Eligible Entities are encouraged to participate in local social service and homeless coalitions whose goal is to coordinate services. Maine CSBG State Office also utilizes the Eligible Entities Community Needs Assessments and other State agency data. These strategies ensure there is coordination among state agencies, non-profits, and businesses throughout the state. The Eligible Entities of Maine have many strategies to ensure that the needs of their communities are met in a collaborative fashion. These strategies ensure that there is coordination among service providers within each Eligible Entity catchment area, as well as across the boundaries of individual Eligible Entity.

Note: This response will pre-populate the corresponding CSBG assurance, item 14.5.

#### 9.3. Eligible Entity Linkages and Coordination

**9.3a** State Assurance of Eligible Entity Linkages and Coordination: Describe how the State will assure that the eligible entities will coordinate and establish linkages to assure the effective delivery of 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)). Attach additional information as needed

#### Narrative:

The State requires CSBG Eligible Entities to coordinate funds at the local level. Their annual Community Action Plan must describe their coordination efforts with city, county, schools, non-profits, and other organizations. CSBG Eligible Entities coordinate services and work to avoid duplication of services with other providers. Most CSBG eligible entities participate in local social service and homeless coalitions whose goal is to coordinate services.

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

# 9.3 b 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)

#### Narrative:

Annually, CSBG eligible entities must submit a Community Action Plan to the Department. The document includes a section wherein Eligible Entities describe any gaps in services and their strategy to address those gaps. If a gap is not currently being addressed or not being sufficiently addressed, Eligible Entities are to develop and implement a strategy to work with other organizations in their local communities to address the gaps in services. Note: This response will link to the corresponding CSBG assurance, item 14.3b.

**94.** 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** 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 neighbor- hood-based organizations as part of a community antipoverty strategy.
- **9.4b.** 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.

# Narrative:

The State of Maine has a WIOA Unified Plan in which CSBG is a required partner, and the Eligible Entities have the option of becoming Title I partners with their Local Workforce Development Boards. The CSBG State Office is responsible for being an active liaison between the State Workforce Board (SWB), the three Local Workforce Boards, the State Association, and the 10 Community Action Agencies.

**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).

**Narrative:** The Maine State Housing Authority (MSHA) administers the LIHEAP grant, which funds the Low-Income Assistance program, LIAP and Heating Assistance, LIHEAP. The LIAP and LIHEAP programs provide utility assistance to persons with low-incomes and include an energy crisis component. LIHEAP also supports the Eligible Entities' weatherization programs. The majority of the CSBG Eligible Entities administer both the LIHEAP and weatherization programs.

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

9.6. State Assurance: Faith-based Organizations, Charitable Groups, and 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.

#### Narrative:

Annually, CSBG eligible entities must submit a Community Action Plan to the Department. As part of their plan, CSBG Eligible Entities describe the organizations with which they coordinate services, including faith-based organizations, charitable groups, and community organizations. Close coordination and referral take place with these organizations.

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

# 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.

## Narrative:

Annually, CSBG eligible entities must submit a Community Action Plan to the Department. As part of their plan, CSBG Eligible Entities describe the organizations with which they coordinate services, including private and public organizations. Many of the CSBG Eligible Entities obtain either in-kind assistance or funds from local governments to support the programs that they administer, including donations of space to be utilized by Eligible Entities to provide CSBG-supported services.

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

# 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.

The CSBG State Office works closely with the State Eligible Entities and the Maine Economic Opportunity Council (EOC). The CSBG State Office meets with the EOC on a regular basis to discuss ways that the Department can better meet the needs of the Eligible Entities. The CSBG State Office receives their input on training and technical assistance needs, rule revisions, use of CSBG discretionary funds, and other issues. The EOC and the State Association hold an annual conference for CSBG Eligible Entities, and the CSBG State Office has the opportunity to provide staff to present training to CSBG Eligible Entities. The Department also works with National Association for State Community Services Programs (NASCSP) to form CSBG working groups to help the CSBG State Office develop strategies on key issues such as implementation of CSBG organizational standards. Regarding FFY22 and FFY23, the Department is contracting with the Maine Community Action Partnership for training and technical assistance regarding a variety of critical topics. **Note:** This response will pre-populate the Annual Report, Module 1, Item G.5.

# 9.9 Communication with Eligible Entities and the State Community Action Association:

In the table below, describe the State's plan for communicating with eligible entities, the State Community Action Association, and other partners under this State Plan. Include communication about annual hearings and legislative hearings, as described under Section 4, CSBG Hearing Requirements.

Communication Plan					
Торіс	Expected	Format (drop down)	"Other"		
	Frequency				
	Dropdown Options: Daily Weekly Twice- Monthly Monthly Quarterly Semi- Annually Annually Other	Dropdown Options: Newsletter Mailing Meetings/Presentation Blog Email Website Social Media Other	[Narrative, 2500 characters] If "Other" is selected in columns 2 and/or 3, describe in this column		
Organizational Standards Progress	Monthly				
State Accountability Measures Progress Community Needs Assessments/	Monthly Monthly	Newsletters Mailing			
Community Action Plans	N. A. A. M. H.	Meetings/Presentation			
State Monitoring Plans and Policies Training and Technical Assistance (T/TA) Plans	Monthly Monthly	Blog Email Website			
ROMA and Performance Management	Monthly	Webshe			
State Interagency Coordination	Monthly	1:1			
Tripartite Board Requirements	Monthly	Phone Calls			
State Plan Development	Monthly	Public Notice			
CSBG Legislative/ Programmatic Updates	Semi- Annually	Letters/Hard Copies			
Upcoming Public and/or Legislative Hearings	Annually				

# **9.10.** Feedback to Eligible Entities and State Community Action Association: Describe how the State will provide feedback to local entities and State Community Action Associations regarding performance on State Accountability Measures.

# Narrative:

The Department will inform each Eligible Entity of their performance related to National Performance Indicators (NPI) through email communications and/or letters.

The Department's CSBG performance report requires Eligible Entities to report NPI performance on a quarterly basis and provides them with cumulative year-to-date performance data. Eligible Entity performance, as reported in their quarterly CSBG Performance Report, is reviewed and any potential errors or discrepancies are investigated, and technical assistance is provided.

Additionally, input received from meetings with program monitors is given as feedback to Eligible Entities. When more in-depth training is required, it is provided on site. The Department will inform Eligible Entities of their performance within 60 days of receiving feedback from the Office of Community Services (OCS). This information will be transmitted to Eligible Entities via email or other entity-specific communication.

**Note:** This information is associated with State Accountability Measure 5S(iii). The measure indicates feedback should be provided within 60 calendar days of the State getting feedback from OCS.

**9.11. Performance Management Adjustment:** How is the State adjusting 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.

#### Narrative:

The CSBG State Office continues to recognize the need to develop a formalized, documented communication plan that outlines the specific types of communications, the frequency, etc.

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

# **SECTION 10 Monitoring, Corrective Action, and Fiscal Controls**

Monitoring of Eligible Entities (Section 678B(a) of the CSBG 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. For States that have a monitoring approach that does not fit within the table parameters, attach the State's proposed monitoring schedule.

**Note:** This information is associated with State Accountability Measure 4Sa(i); this response may pre-populate the State's annual report form.

CSBG Eligible Entity	Review Type	Target Date	Date of Last Full Onsite Review (if applicable)	Brief Description of "Other"
Will auto- populate from item 5.1	Dropdown Options: • Full onsite • Newly Designated • Follow-up • Other • No review	Dropdown Options: • FY1 Q1 • FY1 Q2 • FY1 Q3 • FY1 Q4 • FY2 Q1 • FY2 Q2 • FY2 Q3 • FY2 Q4	Select a date	[Narrative, 2500 characters] If "Other" is selected in column 2, describe in this column
АСАР	Full On-Site, Hybrid	FY 2 <i>,</i> Q4	7/18/2022	
ссі	Full On-Site, Hybrid	FY 2 <i>,</i> Q1	11/16/2022	
DCP	Full On-Site, Hybrid	FY 1 <i>,</i> Q1	12/15/2021	
КVСАР	Full On-Site, Hybrid	FY 2 <i>,</i> Q3	11/9/2022	
ММСА	Full On-Site, Hybrid	FY 1 <i>,</i> Q1	12/8/2021	
Penquis	Full On-Site, Hybrid	FY 2 <i>,</i> Q3	7/12/2022	
ТОА	Full On-Site, Hybrid	FY 1 <i>,</i> Q4	9/14/2022	
WCAP	Full On-Site, Hybrid	FY 1, Q3	12/13/2021	
WMCA	Full On-Site, Hybrid	FY 1, Q3	12/1/2021	
YCCAC	Full On-Site, Hybrid	FY 2, Q1	9/19/2022	

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

See Attachment 3: CSBG Monitoring Manual DRAFT

10.3. Initial Monitoring Reports: According to the State's procedures, by how manycalendar days must the State disseminate initial monitoring reports to local entities?
 [Insert a number from 1 – 100]
 60

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

**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 the documenting of closure of findings included in the State monitoring protocols attached above?

🗵 Yes

🗆 No

- 10.4a. If you selected "no," please describe State procedures for addressing eligible entity deficiencies and documenting closure of findings. [Narrative Response, 2500 characters]
- **10.5.** Quality Improvement Plans (QIPs): How many eligible entities are currently on Quality Improvement Plans?

[Numeric, 3 digits] -0-

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

**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?

# Narrative:

The State will notify the Office of Community Services by email or other written correspondence. The CSBG State Office allows the agency to make the correction, and if the correction is made within 30 days and the CSBG State Office can verify, it is noted in their Agency Monitoring follow-up. The CSBG State Office will send the report to the Office of Community Services (OCS). If it is not completed, the CSBG State Office will contact OCS to get guidance on next steps.

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

10.7. Assurance on Funding Reduction or Termination: Does the State assure, according to Section 676(b)(8), 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)."

🗷 Yes 🛛 No

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

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

- 10.8. Does the State CSBG statute and/or regulations provide for the designation of new eligible entities?
   ☑Yes □ No
- 10.8a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for the designation of new eligible entities.
   [ <u>http://legislature.maine.gov/statutes/22/title22ch1477sec0.html</u> https://www.maine.gov/sos/cec/rules/10/144/144c002.doc]
- 10.9. Does the State CSBG statute and/or regulations provide for de-designation of eligible entities?
   ☑Yes □No
   [<u>http://legislature.maine.gov/statutes/22/title22ch1477sec0.html</u>]

   https://www.maine.gov/sos/cec/rules/10/144/144c002.doc]
- 10.9a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for de-designation of new eligible entities.
   [ <u>http://legislature.maine.gov/statutes/22/title22ch1477sec0.html</u>
   <u>https://www1.maine.gov/sos/cec/rules/10/144/144c002.doc</u> ]
- 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?
   ☑Yes □ No
- 10.10a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for re-designation of existing eligible entities.
   [http://legislature.maine.gov/statutes/22/title22ch1477sec0.html https://www.maine.gov/sos/cec/rules/10/144/144c002.doc]

## 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).

## Narrative:

The DHHS Service Center Budget unit reviews the grant application for any discrepancies. DHHS' Department of Contract Management reviews and establishes contracts according to State rules. Strict review processes are in place to ensure proper coding on invoices and grant period of availability. Budget Variance Reports are created based on the grant award and approved allocation received from program for monitoring of spend by category. The DHHS Service Center uses units (accounts) and Program Codes/Program Periods to monitor expenditures and draws per grant period. The Program Codes/Periods can identify period of availability issues. The Financial Status Report is based on the expenditures that occurred during the grant period. Full Grant Reconciliations are performed to ensure that all expenditures were claimed and drawn for properly before the grant closeout time

**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. If these procedures are described in the State monitoring protocols attached under item 10.2, indicate the page number.

# Narrative:

See attached single audit reports. The Department includes the Division of Audit, Program, and the Commissioner's office when issuing reports.

Note: This information is associated with State Accountability Measure 4Sd.

**10.13.** Assurance on Federal Investigations: Will the State "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?

⊠Yes

🗆 No

Note: This response will link with the corresponding assurance, item 14.7

**10.14. Performance Management Adjustment:** How is the State adjusting 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 this State is not making any adjustments, provide further detail.

#### Narrative:

On-site visits are to be conducted every three years and desk audits in the other two years. The Department has engaged the Office of Community Services (OCS) for guidance and technical assistance in reviewing its current processes and schedule of reviews. The CSBG State Office expects to incorporate what it learns from OCS, as the Department moves forward with monitoring. Under consideration is a process in which the Department may schedule on-site visits throughout the two-year grant cycle. OCFS completed on-site visits with each Eligible Entity in 2021 and 2022. These on-site visits included the Division of Audit. Surveys were provided to board members, and many other documents were obtained from the Eligible Entities.

**Note:** This item is associated with State Accountability Measure 4Sb and may prepopulate the State's annual report form.

# **SECTION 11 Eligible Entity Tripartite Board**

- 11.1. Which of the following measures are taken to ensure that the State verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B of the CSBG Act? [Check all that applies and narrative where applicable]
  - ☑ Attend Board meetings
  - Review copies of Board meeting minutes
  - ☑ Track Board vacancies/composition
  - □ Other
- 11.2. How often does the State require eligible entities (which are not on TAPs or QIPs) to provide updates (e.g., copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc.) regarding their Tripartite Boards?[Check all that applies and narrative where applicable]
  - ⊠ Annually
  - □ Semiannually
  - ☑ Quarterly
  - □ Monthly
  - ⊠ Other

#### Narrative:

Bylaws are provided through Organizational Standard Reviews; board minutes are provided five days after board approval, and board attendance is due quarterly with vacancy information.

**11.3.** Assurance on Eligible Entity Tripartite Board Representation: Describe how the State will carry out the assurance under Section 676(b)(10) of the CSBG Act that the State will require eligible entities to have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entities' Tripartite Board.

**Narrative:** Through contracting, monitoring board meeting minutes, and attendance at board meetings.

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

**11.4.** 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 participation by low-income individuals in the development, planning, implementation, and evaluation of programs" as allowed under Section 676B(b)(2) of the CSBG Act.

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

#### Narrative:

Agencies have advisory boards that provide input. Most have Head Start which requires participants with low incomes.

#### **SECTION 12 Individual and Community Income Eligibility Requirements**

- **12.1. Required Income Eligibility:** What is 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):\_\_\_\_\_%
     [insert up to a 3 digit percentage]
  - □ Varies by eligible entity
- **12.1a.** Describe any State policy and/or procedures for income eligibility, such as treatment of income and family/household composition.

#### Narrative:

The State conducts on-site reviews and audits, as well as has policies in place and language in contracts to ensure income eligibility is met.

**12.2.** Income Eligibility for General/Short Term Services: For services with limited in-take procedures (where individual income verification is not possible or practical), how does the State ensure eligible entities generally verify income eligibility for services? An example of these services is emergency food assistance.

**Narrative:** Some programs may have additional funding sources that Eligible Entities utilize to serve those individuals and families with incomes that exceed the 125%. If a program is all CSBG funding, eligible entities require income verification, unless it is a community-based service, as allowed.

**12.3. Community-targeted Services:** For services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations), how does the State ensure eligible entities' services target and benefit low- income communities?

**Narrative:** Some programs may have additional funding sources that Eligible Entities utilize to serve those individuals and families with incomes that exceed the 125%. If a program is all CSBG funding, the eligible entity requires income verification, unless it is a community- based service, as allowed. If it is a community-based program, the CSBG State Office receives notification of community services and an outline on the target population.

#### SECTION 13 Results Oriented Management and Accountability (ROMA) System

**13.1. ROMA Participation:** In which performance measurement system will the State and all eligible entities participate, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act? **[Check one]** 

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

- In the Results Oriented Management and Accountability (ROMA) System
- □ Another performance management system that meets the requirements of section 678E(b) of the CSBG Act
- □ An alternative system for measuring performance and results
- **13.1a.** If ROMA was selected in item 13.1, attach and/or describe the State's written policies, procedures, or guidance documents on ROMA

**Narrative:** Results Oriented Management and Accountability (ROMA) is incorporated in the performance management requirements in Eligible Entities' contracts.

- **13.1b.** If ROMA was not selected in item 13.1, describe the system the State will use for performance measurement.
- **13.2.** 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? See Attachment 9: 2017 - 2018 Planned Outcomes

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

- Second Section CSBG National Performance Indicators (NPIs)
- NPIs and others
- □ Others

#### Narrative:

The CSBG State Office assigns each Eligible Entity a goal for the number of persons to transition out of poverty each program year. Eligible Entities are to target their CSBG resources to assist persons to transition out of poverty and move towards self-sufficiency consistent with identified gaps in need. The eligible entities' efforts in this area are reported using the NPIs in their quarterly performance reports.

**13.3.** How does the State support the eligible entities in using the ROMA system (or alternative performance measurement system)?

#### Narrative:

The CSBG State Office continues to support all Results Oriented Management and Accountability (ROMA) related training requests, and the CSBG State Office is also working with the State Association to establish a ROMA Implementer in each eligible entity, as well as institute a statewide data system and associated training to better prepare the entities for the expected changes in the performance management framework that come from continuous improvement. Additionally, the CSBG State Office had previously designed the CSBG training curriculum with a focus on ROMA principles. All trainings provided to eligible entities were ROMA-focused, and the ROMA-trained Eligible Entity staff members are available to provide training and technical assistance. Eligible Entities can request training and technical assistance at any time, submit questions online, or can contact staff by phone or email.

**Note:** The activities described under item 13.3 may include activities listed in "Section 8: 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.

**13.4.** Eligible Entity Use of Data: How is the State validating that the eligible entities are using data to improve service delivery?

#### Narrative:

The State Coordinator reviews the eligible entities' quarterly performance reports and end- of-year final report. The CSBG State Office compares previous year and current year ending results, in order to establish improvements, inquiries, and understanding of service improvement. The Coordinator will continue to provide technical assistance to agencies to improve their performance. To assist with data usages, the CSBG State Office provides the Eligible Entities with links to data sources that may be useful for them, such as an internal data reporting site, the Community Action Partnership's Community Needs Assessment Online Tool, etc. As Maine moves forward with a statewide database, data is becoming more readily available for improved service delivery and result tracking.

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

#### **Community Action Plans and Needs Assessments**

13.5. 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.

**Narrative**: The CSBG State Office develops Community Action Plan requirements and guidance and disseminates this to Eligible Entities. Annually, the CSBG State Office contracts with the Eligible Entities require a Community Action Plan, as a condition of

receipt of CSBG funding. CSBG State Office staff review the Community Action Plans (CNA), verifies the work to the needs identified in the Eligible Entities' Community Needs Assessment and provides technical assistance/feedback to Eligible Entities on improvements.

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

**13.6. State Assurance:** 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.

#### Narrative:

The CSBG State Office develops Community Needs Assessment guidance and provides this information to Eligible Entities. The Department contracts with the Eligible Entities require a Community Needs Assessment (CNA) every three years as a condition of receipt of CSBG funding. In 2021, Maine's 10 eligible entities collaborated and conducted a statewide CNA that shall be utilized by each CAA, as this CNA provides a county profile on each county in the State which is how funding allocation is dispersed by serving counties/catchment areas.

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

#### 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 farmworkers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals--
  - 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;
  - 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 meansto meet immediate and urgent individual and family needs;
  - (vi) 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 –
    - document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and
    - strengthen and improve relationships with local lawenforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

**Narrative:** The CSBG State Office requires CSBG Eligible Entities to submit an annual Community Action Plan (CAP). The CAP includes a Performance Statement which outlines their proposed activities. Staff review the CAP and ensure that the activities supported are eligible uses of CSBG funds and meet the noted assurances.

#### 14.1b. 676(b)(1)(B) Needs of Youth

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--
  - 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;

**Narrative:** The CSBG State Office requires CSBG Eligible Entities to submit an annual Community Action Plan (CAP). The CAP includes a Performance Statement which outlines their proposed activities. Staff review the CAP and ensure that the activities supported are eligible uses of CSBG funds and meet the noted assurances.

#### 14.1 c. 676(b)(1)(C) Coordination of Other Programs

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)

#### Narrative:

The CSBG State Office requires CSBG Eligible Entities to submit an annual Community Action Plan (CAP). The CAP includes a Performance Statement which outlines their proposed activities. The CAP also includes several forms that address funding coordination, coordination with DHHS programs, referrals to Child Support Office, and participation in social services coalitions. Staff review the CAP and ensure that the activities supported are eligible uses of CSBG funds.

#### 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

# [No response required; links to 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... Eligible Entity Service Delivery System
- 14.3 a. 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;

#### Narrative:

Each program requires a percentage of CSBG funding being used and a report delineating the number of families and individuals with low incomes being served with the CSBG funds, in addition to the total number of participants assisted, additional funding sources, and the outcomes.

#### 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 follow- up consultations."

**Note:** The State describes this assurance in the State Linkages and Communication section, item 9.3b.

#### [No response required; links to 9.3b.

Annually, CSBG eligible entities must submit a Community Action Plan to the CSBG State Office. The document includes a section wherein eligible entities describe any gaps in services and their strategy to address those gaps. If a gap is not currently being addressed or not being sufficiently addressed, eligible entities are to develop and implement a strategy to work with other organizations in their local communities to address the gaps in services.]

#### 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.

#### [No response required; links to 9.7

Annually, CSBG eligible entities must submit a Community Action Plan to the CSBG State Office. As part of their plan, CSBG eligible entities describe the organizations with which they coordinate services, including private and public organizations. Many of the CSBG- eligible entities obtain either in-kind assistance or funds from local governments to support the programs that they administer, including donations of space to be utilized by eligible entities to provide CSBG-supported services.]

#### 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 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).

#### Narrative:

The CSBG State Office requires CSBG Eligible Entities to submit an annual Community Action Plan (CAP). The CAP includes a Performance Statement which outlines their proposed activities. Staff review the CAP and ensure that the activities supported are eligible uses of CSBG funds and meet the noted assurances.

#### Eligible Entity Emergency Food and Nutrition Services (Updates needed for FY17-18)

**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."

#### Narrative:

The CSBG State Office requires CSBG Eligible Entities to submit an annual Community Action Plan (CAP). The CAP includes a Performance Statement which outlines their proposed activities. Staff review the CAP and ensure that the activities supported are eligible uses of CSBG funds and meet the noted assurances.

# 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.

[No response; links to 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.

[No response; links to 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."

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

[No response; links to 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)."

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

#### [No response; links to 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.

#### [No response; links to 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

[No response; links to item 11.3]

#### **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

[No response; links to item 11.3]

#### **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 State, as a condition to receipt of funding by the entity through a community 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."

[No response; links to 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 section 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.

[No response; links to 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. **[No response for this item]** 

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

#### **SECTION 15 Federal Certifications**

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

#### 15.1 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.

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

#### 15.2 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 eligible entity 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 eligible entity 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 eligible entity's other than individuals, Alternate I applies.
- (4) For eligible entities who are individuals, Alternate II applies.
- (5) Workplaces under grants, for eligible entity's other than individuals, need to be identified on the certification. If known, they may be identified in the grant application. If the eligible entity does not identify the workplaces at the time of application, or upon award, if there is no application, the eligible entity 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 eligible entity'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 eligible entity 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 Non-procurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Eligible entity's' attention is called, in particular, to the following definitions from theserules:

<u>Controlled substance</u> 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);

<u>Conviction</u> 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;

<u>Criminal drug statute</u> means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance; <u>Employee</u> means the employee of a eligible entity 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 eligible entity's payroll. This definition does not include workers not on the payroll of the eligible entity (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the eligible entity's payroll; or employees of subrecipients or subcontractors in covered workplaces).

#### Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Eligible entities Other Than Individuals)

The eligible entity 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 eligible entity'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 eligible entity'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 eligible entity 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) [Autofill] Check if there are workplaces on file that are not identified here.

Alternate II. (Eligible entities Who Are Individuals)

- (a) The eligible entity 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]

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

### 15.3 Debarment

#### 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 Non-procurement 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
- (3) 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 remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
- (4) 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.
- (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 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.

- (6) 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.
- (7) 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.
- (8) 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 Non-procurement 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 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.
  - By checking this box, the State CSBG authorized official is providing the certification set out above.
- 15.4 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/eligible entity certifies that it will comply with the requirements of the Act.

The applicant/eligible entity 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 Eligible Entities shall certify accordingly.

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



GOVERNOR

STATE OF MAINE OFFICE OF THE GOVERNOR 1 STATE HOUSE STATION AUGUSTA, MAINE 04333-0001

October 26, 2020

Clarence Carter Acting Director of the Office of Community Service Administration for Children and Families Department of Health and Human Services 330 C Street, SW, 5<sup>th</sup> Floor Washington, DC 20201

RE: Community Services Block Grant Designation Letter

Dear Mr. Carter,

It is my pleasure to notify you that I continue to designate Maine's Department of Health and Human Services as the state level administrative agency for all aspects of the Community Services Block Grant (CSBG). The Office of Child and Family Services (OCFS) is the functional division authorized to apply for, certify, execute, and administer all requirements of the Community Services Block Grant. As such, I designate the OCFS Director as responsible for the Community Services Block Grant. This designation is effective October 1, 2019.

Sincerely,

Janet T. Mills Governor



PHONE: (207) 287-3531 (VOICE)

FAX: (207) 287-1034

Janet T. Mills Governor



Jeanne M. Lambrew, Ph. D. Commissioner

October 19, 2020

Clarence Carter Acting Director of the Office of Community Service Administration for Children and Families Department of Health and Human Services 330 C Street, SW, 5<sup>th</sup> Floor Washington, DC 20201

RE: Community Services Block Grant Designation Letter

Dear Mr. Carter:

As the Maine Community Services Block Grant Authorized Official, I hereby designate the following positions as responsible for the Community Services Block Grant:

- CSBG Administrator
- CSBG Coordinator
- CSBG Specialist

These positions will be responsible for management and administration of CSBG which includes applying for funding on behalf of the State of Maine, certifying state plans, and submission of the SF-424M and annual report. This designation is effective October 1, 2019.

Sincerely,

Director Office of Child and Family Services Maine Department of Health and Human Services

## **PUBLIC NOTICE**

Issue Date: August 7, 2023

## MAINE DEPARTMENT OF HEALTH AND HUMAN SERVICES PUBLIC COMMENT ON THE STATE OF MAINE COMMUNITY SERVICES BLOCK GRANT (CSBG) PLAN OCTOBER 1, 2023 – SEPTEMBER 30, 2025

The Department of Health and Human Services requests public comment on the abovereferenced plan. A copy of the proposed plan is available for public inspection on the Maine.gov website at: <u>https://www.maine.gov/dhhs/ocfs/about-us/policy-rules</u>

The Department will accept written comments on the plan sent to any of the following addresses:

Public Hearing Scheduled for August 9, 2021 at 4:00pm; Virtual Attendance Only

Please email at the address below for link or phone in option

E-mail: Jaimi.Clifford@Maine.gov Fax: (207) 287-6156

Mail: Maine Department of Health and Human Services Office of Child and Family Services ATTN: Jaimi Clifford CSBG State Coordinator 2 Anthony Avenue, SHS 11 Augusta, ME 04333-0011

Written comments should be sent, so the Department will receive them before
5:00pm, August 25, 2021, and should include contact information for the person providing comments, as well as the name of the organization that person represents, if applicable.



## **Office of Child and Family Services**

## Community Services Block Grant Program

## **Policies and Procedures Manual**

V08.30.19

CSBG State Office Office of Child and Family Services Department of Health and Human Services 2 Anthony Ave. Augusta, ME 04333 (207)-624-7900

The CSBG State Office has assembled the following monitoring guides and checklists in an effort to provide comprehensive procedures for monitoring agencies that are awarded subcontracts under the Community Services Block Grant program. These guides and checklists are a work in process. As new ideas and innovative techniques and procedures emerge, both through "hands-on" use by our Program Specialists and Fiscal monitoring staff, as well as the continual training and collaborating with others throughout the year, the guides and checklists are modified in an effort to make the monitoring process as efficient and effective as possible.

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## I. General Information

#### a. Background and Purpose

The Community Services Block Grant (CSBG) is federal funding from the U.S. Department of Health and Human Services (HHS) that was created through the Economic Opportunity Act of 1964 and is administered at the State and territory level. CSBG funding supports activities that help to reduce poverty, revitalize low-income communities, and empower low-income families and individuals to become self-sufficient. In Maine, CSBG funding is at the core of a network of Community Action Agencies (CAAs) which mobilize resources and communities to fight poverty. Through CSBG support, CAAs can respond to the causes and conditions of poverty by delivering services and strategies tailored to meet priority needs unique to their communities.

This CSBG policies and procedures manual describes certain general principles governing the Office of Child and Family Services' (OCFS) approach to the CSBG program. The manual outlines the tasks that OCFS generally undertakes to meet the objectives of the CSBG program, subject to the availability of resources and upon OCFS' evaluation of the totality of circumstances. It is not intended to be exhaustive. Certain additional program-specific protocols and provisions may be set forth in other plans, contracts, notices, or other directives as applicable.

This manual also includes forms, tools, dates, and other brief summaries of information which are provided for illustration purposes only. OCFS may issue updates and changes to these from time to time, without requiring the reissuance of this manual. As such, OCFS staff and the eligible entities should refer to current source documents.

### b. Legislation and Guidance

The following legislation, guidance, and legal authority inform the CSBG policies and procedures described in this manual:

- Coats Human Services Reauthorization Act of 1988 (42 USC 9901 CSBG Act)
- CSBG Regulation 45 CFR 96
- Maine's Community Services Block Grant Program 10-144, Chapter 2
- Maine CSBG Revised State Statute
- Office of Management and Budget Uniform Administrative Requirements, Cost
- Principles, and Audit Requirements for Federal Awards (2 CFR 200 OMB Super Circular)
- <u>Policy and Guidance issued periodically by HHS, Office of Community Services (OCS)</u> (Information Memorandums, etc.)
- Various State Laws, Regulations, OCFS IMs, and applicable contract provisions

#### c. Administering Agency

In accordance with Section 676(a)(1) of the federal Community Services Block Grant Act, as amended (Pub. 105-285) (federal CSBG Act), the Governor of Maine has designated the Department of Health and Human Services (DHHS), Office of Child and Family Services (OCFS) as the lead administering agency of the CSBG program.

#### d. Eligible Entities

Only a duly designated eligible entity can receive CSBG funding. Currently Maine provides funding to ten (10) designated nonprofit eligible entities, also known as <u>CAAs</u>, who provide a variety of community-based services, programs, and activities that promote self- sufficiency for low-income families and individuals residing in Maine.

Procedures and requirements for eligible entity designation are specified in Section 1.3 of the State Department Rules; Section 10-144; Chapter 2: COMMUNITY SERVICES BLOCK GRANT PROGRAM. Among the requirements is that each entity must be governed by a tripartite board representing appointed leaders from the private sector, elected public officials or their representatives, and low-income individuals or representatives from the low-income community who reside in the designated service area.

#### e. Funding Formula and Allocation

Federal requirements stipulate that at least 90% of CSBG funds be passed through to the CAAs. In Maine, these funds are distributed to CAAs based on a historical formula. Planned and actual allocations to each CAA are specified in the two-year CSBG State Plan and Annual Report, respectively.

Of the remaining 10%, states can use up to 5% for administrative cost and the remaining funds for discretionary projects that help accomplish the statutory goals of CSBG.

#### Example Formula:

Est. Award	3,750,159.00
Administrative	187,507.95
Discretionary	187,507.95
90% Pass Through	3,375,143.10

Agency	Contract	% of contract funds	Based Allocation of 50% equal	Calculated Allocation based on low- income households in catchment area	Total Contract
Agency 1	CFS-19-70xx	9.48%	168,757.15	159,981.78	328,738.93
Agency 2	CFS-19-70xx	5.79%	168,757.15	97,710.39	266,467.54
Agency 3	CFS-19-70xx	13.83%	168,757.15	233,391.14	402,148.29
Agency 4	CFS-19-70xx	13.93%	168,757.15	235,078.71	403,835.86
Agency 5	CFS-19-70xx	19.12%	168,757.15	322,663.67	491,420.82
Agency 6	CFS-19-70xx	12.66%	168,757.15	213,646.55	382,403.70
Agency 7	CFS-19-70xx	4.03%	168,757.15	68,009.13	236,766.28
Agency 8	CFS-19-70xx	8.89%	168,757.15	150,025.11	318,782.26
Agency 9	CFS-19-70xx	3.37%	168,757.15	56,871.16	225,628.31
Agency 10	CFS-19-70xx	8.90%	168,757.15	150,193.86	318,951.01
TOTAL		100 %	1,687,571.50	1,687,571.50	3,375,143.00

### II. State Plan

#### a. Overview

Pursuant to Section 676 of the federal <u>CSBG Act</u>, OCFS is required to submit to Department of Health and Human Services (HHS) a state plan every two federal fiscal years. The CSBG State Plan provides program grantees information on how the State will distribute and allocate CSBG program funds, describes the State's plan to meet assurances required by the Act, and establishes state accountability measures required for the reporting period among, other things. The most recently approved State Plan is available on <u>OCFS Website</u>, while related documentation and prior plans can be found in the OCFS shared CSBG Drive.

The State Plan is generally prepared by the Community Services Block Grant Coordinator and in collaboration with the Maine's CSBG Network. Prior to its submission to HHS, the Plan is reviewed for approval or edits as necessary by the OCFS Business Services Manager, OCFS Office Director, and/or DHHS Commissioner. Once approved, a public hearing must be scheduled to allow for public comment. After this process, The CSBG State Office certifies the report and submits it to HHS through the *Online Data Collection* (OLDC) system. Once the submitted State Plan is reviewed and approved, HHS issues an approval letter and Award letter.

#### b. Public Comment and Hearing

In accordance with the federal <u>CSBG Act</u>, OCFS holds a public comment period and hearing in conjunction with the development of each state plan, as well as a legislative hearing every two years. Plans are due no later than 30 days prior to the beginning of the first fiscal year covered by the plan and are submitted to HHS through OLDC.

Prior to posting the draft plan, OCFS is committed to soliciting informal input from the CAA network through multiple means, including but not limited to; planning meetings, conference calls, emailed feedback and meetings with the state association's (MCAA) Executive Committee members. OCFS also generally analyzes and considers a variety of performance management data while developing the draft State Plan including: the CSBG Annual Report, responses to the ACSI Survey, and the vast amount of Community Needs Assessments, Strategic Plans and Community Action Plan documents that are available throughout the network.

The draft plan is routinely posted on OCFS's website, along with written notification of the public hearing date(s), time(s) and location(s). Testimony received at the hearing and timely

written comments received are considered, and any appropriate changes are made before the plan is finalized and submitted to HHS for approval.

For illustration purposes, the following is a sample timeline summary of the overall State Plan development process and approximate date ranges.

#### c. Development Process

The following is a timeline summary of the overall State Plan development process:

State Plan **Development Year and** approximate dates • December • October **OCFS** initiates State Plan development process approval) • January - February March Informal feedback from network collected and reviewed OCS March Annual Report (prior State Plan progress) submitted to OCS April **OCFS** completes State Plan draft • May State Plan draft circulated for OCFS internal sign-off • June - July State Plan draft posted to DHCD website, 30-Day Open **Comment Period & Public** Hearing held • OCFS reviews public comments and revises Plan as needed August State Plan circulated for OCFS internal sign-off September State Plan submitted to OCS by 9/1

State Plan - FY 1 and approximate dates

October Final State Plan posted to OCFS website (pending OCS approval)

March Annual Report (prior State Plan progress) submitted to OCS State Plan - FY2 and approximate dates

- December OCFS initiates State Plan development process; if there is a needed change.
- January February Informal feedback collected and reviewed
- <u>March</u> Annual Report (prior State Plan progress) submitted to OCS
- <u>April</u> OCFS completes State Plan draft

• <u>May</u> State Plan draft circulated for OCFS internal sign-off

• June - July State Plan draft posted to DHCD website, 30-Day Open Comment Period & Public Hearing held

OCFS reviews public comments and revises Plan as needed

- <u>August</u>
   State Plan circulated for
   OCFS internal sign-off
- •<u>September</u> <u>State Plan submitted to</u> <u>OCS by 9/1</u> \*Note, that a 2<sup>nd</sup> year plan is

optional

### III. Results Orientated Management and Accountability

Section 678E(a) and the assurance under Section 676(b)(12) of the federal CSBG Act require States receiving CSBG funds and all CAAs in the State to participate in a performance measurement system. Maine has chosen to participate in the Results Oriented Management and Accountability (ROMA) System.

#### a. State ROMA Support

As part of our State participation in ROMA, OCFS aims to support our CAA network in utilizing the ROMA System through multiple means including, but not limited, to:

- Alignment of key State CSBG deliverables with ROMA principles and practices.
- Written guidance on completing Community Action Plans and the CSBG Annual Report, as well as subsequent reviews and written feedback from the state.
- Written guidance, training, and technical assistance on conducting the three-year community assessment and strategic planning process along with subsequent reviews and written feedback on CAA planning processes and submitted reports.
- Investment of CSBG discretionary funds in the MCAA Training and Technical Assistance Contract to train and provide ongoing support related to ROMA implementation, including coordination of the ROMA Implementer/Trainer certification process.

#### b. ROMA Cycle

ROMA is a system for continuous quality improvement enabling the Community Action network to measure, analyze, and communicate performance. "Implementation" of ROMA occurs in five phases: Assessment, Planning, Implementation, Achievement of Results, and Evaluation. The following graphic depicts how key CSBG deliverables in Maine align with these phases:



#### c. ROMA Reviews

State Accountability Measure 5S(ii) described in OCS <u>IM 144</u> directs States to provide eligible entities written feedback regarding their performance in meeting ROMA goals, within 60 calendar days of submitting the State's CSBG Annual Report.

In order to meet 5S(ii), OCFS provides written feedback to our eligible entities on their performance in meeting ROMA Goals multiple times throughout the year including at the Annual Report. Written feedback is typically provided through email and addresses any targeting concerns and/or need for adjustment identified during the review of each report. Similarly, upon receipt of each entity's draft Community Action Plan for the subsequent year, feedback is typically provided (based on prior performance) on National Performance Indicators (NPIs) selected and targeting.

The State's ROMA review is not intended to result in feedback and guidance on specific programs and/activities. It is, however, intended to result in feedback and guidance on how well the agency implements ROMA principles. For example, a ROMA review should consider questions such as:

✓ Is the Need/Goal, Strategy Statement of each program, initiative, etc. included in the CAP clearly stated?

Do the services and strategies included in the CAP address needs identified in the agency's community assessment?

✓ Do the selected NPIs allow the agency to monitor progress meeting their goals? (ex. – A shelter program has the main goal of helping families obtain housing but only selects the outcome measure: "number of households experiencing homelessness who obtained safe temporary shelter." The program should also utilize the outcome: "number of households who obtained safe and affordable housing.)

Does the description identify measurement tools/processes to adequately track selected outcome(s)? (ex. – An agency providing financial literacy classes using the outcome measure "number of individuals who achieved and maintained capacity to meet basic needs for 90 days" but has no means to follow-up with class attendees for 90+days)

Are any of the actual NPIs reported in the Annual Report +/- 20% of what the agency targeted and if so, is there a comment that addresses the cause and/or plan to address the disparity? (*Note:* In the context of ROMA, it is ok for an agency to fall short/exceed their target, so long as they are looking at and making adjustments based the data.)

## IV. Contracts

Annually, each CAA must execute a contract with OCFS for the administration of the CSBG Program. OCFS generally requires that executed contracts be returned by the end of September. The contracts consist of several documents including the Rider A Contract terms, Terms and Conditions required by the Division of Contract Management (DCM), a Scope of Services for the CAA's administration of the CSBG Program, the CAA's workplan and budget for the administration of the program, and other documents that are incorporated into the contract by reference.

Detailed information regarding the DHHS contracting process can be found at the Division of Contract Management website: <u>https://www.maine.gov/dhhs/contracts/</u>.

## V. Community Action Plan

Section 676(b)(11) of the federal <u>CSBG Act</u> requires States to assure they will "secure from each eligible entity in the State, as a condition to receipt of funding" a community action plan inclusive of a community-needs assessment. To meet this assurance, Maine's Regulations and relevant contract provisions require Maine's CAAs to "develop and submit a Community Action Plan to the Department for review and approval" as a condition for funding. The Community Action Plan (CAP) is submitted to OCFS through email and summarizes a CAA's work over the course of a contract year. According to the State Regulation the CAP must include the following:

- 1.) A workplan with administration and program objectives, activities, and performance outcomes including relevant detail on each project to be funded; and
- 2.) A CSBG budget.

The CAP process outlined below corresponds to OCFS's annual CSBG contract process described elsewhere in this manual.

#### a. Annual Application and Contract

- Approximately four (4) months prior to the start of program year, (about June) the CSBG State Office notifies the CSBG Network that the contract is being reviewed for any necessary edits, additions, deletions, etc., that will form the next contract. This is a mechanism to allow the agencies to have input on the following year, along with submitting the annual CAP.
- Once the network agrees regarding Rider A of the contract, Maine's Division of Contract Management (DCM) will conduct the contract process. CAAs are provided the final draft of the contract and must submit their completed workplans to the CSBG State Office and submit their budgets to DCM.
- 3. Upon submission, the CSBG State Coordinator generally completes a ROMA review of the CAP (as outlined in the next section), accepts the workplan and budget, and notifies the Contracts Administrator.

#### b. Reports on Progress

CAAs are required by their contracts with OCFS to submit Quarterly Reports regarding National Performance Indicator Results. Additionally, CAAs are required to submit four (4) quarterly fiscal reports regarding the operation of funded projects. All reports are due via email submission within 30 days after each reporting period ends, except for the last quarter of the year in which agencies have 60 days. Upon submission, the CSBG State Coordinator generally completes a ROMA review of the Quarterly NPI Reports (as outlined in section III. of this manual), Performance Measure Report, and the Provider Packet. In addition, DCM generally completes its own review and approval of quarterly fiscal reports.

## VI. State Reporting

#### a. CSBG Annual Report

Section 678E of the federal <u>CSBG Act</u> requires States to annually prepare and submit a report on the measured performance of the State and the eligible entities in the State. Effective for the 2018 program year, the <u>CSBG Annual Report</u> replaced the Information System (IS) Survey as the tool through which States submit this report. Annual Reports are due approximately six (6) months after the prior program year ends and are submitted to HHS through their OLDC system. The Annual Report is generally prepared by the CSBG State Coordinator, with some sections completed by the CSBG Fiscal Representative or Finance Manager. The CSBG State Coordinator Supervisor reviews the annual report for approval or edits if necessary. Once approved, the CSBG State Coordinator submits the report in Grant Solutions Online Data Collection (OLDC) website at <u>www.grantsolutions.com</u>.

Similar to the IS Survey, the Annual Report also requires states to collect information from CAAs regarding the demographics of clients served, uses of CSBG funds, and CAA results for the prior program year. As a result, OCFS' contract requires CAAs to collect information, hold it in a secure and confidential manner that complies with relevant requirements, and submit this information to OCFS each year, approximately four (4) months after the prior program year ends. OCFS staff then complete a ROMA review (as outlined in section III. of this manual) and accept each agency report before submitting along with the statewide Annual Report to OCS.

b. Federal Financial Report (FFR) SF-425

Generally, the SF-425 for CSBG Block Grant funds is prepared by DHHS Service Center representative or Finance Manager using the "Federal Financial Report Instructions". The fiscal staff enters the report data into OLDC and saves a draft form. The draft is reviewed by Management at the Service Center for approval or edits if necessary. Once approved, Service Center certifies and submits the report in OLDC.

Submission Schedule: Annual. Each annual report must be submitted within 90 days following the end of each Federal Fiscal Year.

- An Initial report (covering Year 1 of the project period) is due 90 days following the end of Federal Fiscal Year 1;
- A Final report (cumulative, covering the entire 2-year project period) is due 90 days following the end of Federal Fiscal Year 2.

Among the CAA responsibilities specified in the federal <u>CSBG Act, 760 CMR 29.00</u>, and in applicable contract provisions, is a requirement to conduct a community needs assessment. Effective 2015, further requirements were added under the Center of Excellence (COE) developed CSBG Organizational Standards, implemented in Maine pursuant to OCS IM <u>138</u>, including that CAAs must complete a community assessment and issue a report at least every three years. The COE Standards also require CAAs to complete a strategic plan at least every five years and that certain information collected during the community assessment be included in the strategic plan.

## VIII. Monitoring

#### a. Purpose

Section 678B of the federal <u>CSBG Act</u> requires State CSBG Lead Agencies to establish "performance goals, administrative standards, financial management requirements, and other requirements" that ensure an appropriate level of accountability and quality among the State's eligible entities. The federal CSBG Act also requires that State Lead Agencies perform a full onsite review of each CAA at least once during each three-year period, an on-site review of newly designated CAAs, and other reviews as appropriate. OCFS monitors CAAs in accordance with the federal CSBG Act, state regulations and statutes, contractual requirements, as well as IMs published by OCS.

On January 26, 2015, OCS published <u>IM 138</u> which stated that for States to meet the responsibilities outlined in the federal CSBG Act, they "must establish and communicate clear and comprehensive standards and hold eligible entities accountable according to the standards as part of their oversight duties." OCFS, in collaboration with the State's eligible entities and the State Association (MCAA), selected the Center of Excellence (COE) developed CSBG Organizational Standards for Private CSBG Eligible Entities as the comprehensive standards by which CAAs would be assessed annually.

#### b. Guiding Principles

OCFS follows the guiding principles endorsed by the National Association of State Community Action Programs in its approach to monitoring CAA compliance with the goals of the federal CSBG Act:

#### **Mutual Respect**

In working with sub grantee boards, staff, and consultants, OCFS values the unique knowledge, ability, and independence of each person. Mutual respect is of central concern to OCFS.

#### **Open Communication**

OCFS endeavors to keep lines of communication open and facilitate good working relationships with its partners. OCFS's goals are to communicate frequently through a variety of tools and media, assist in developing solutions to problems, share program improvement ideas, and provide information on new developments in the anti-poverty field. OCFS is open to contact and is committed to listening to suggestions/concerns and to gaining an understanding of local operations and to assist its local partners in pursuing CSBG priorities.

#### Joint Problem solving

OCFS endeavors to promote an environment in which the agency and all the State's eligible entities will be open to change and working together in exploring options and developing mutually agreeable solutions.

#### c. Process Overview

OCFS monitors whether CAAs are meeting the goals of the federal CSBG Act through a multipart process for each CAA which includes:

- 1. Reviewing three-year community assessment and strategic plan documents as well as annual Community Action Plans and Annual Report submissions (as outlined elsewhere in this manual)
- 2. Conducting annual desk level reviews of the Organizational Standards
- 3. Performing full on-site reviews, at least once during each three-year period and in accordance with a planned calendar.
- 4. Conducting ongoing reviews of fiscal activities and contract requirements
- 5. Conducting Board monitoring, including ongoing reviews of minutes and periodic meeting visits

Documents utilized for CSBG monitoring, including monitoring calendars, tools, and flowcharts outlining the process, are saved in the CSBG Shared Drive.

#### d. Monitoring Schedule and Risk Assessment

As part of the CSBG State Plan submitted to OCS, OCFS includes an estimated schedule for monitoring visits during the two-year State Plan period. Approximately four (4) months before the start of each program year, OCFS completes a risk assessment evaluation for each CAA, the results of which inform the final monitoring schedule for the next year. The current Risk Assessment Evaluation form is included for illustration purposes in the attached *Appendix B* of this manual and copies of previous evaluations are saved in the OCFS shared drive CSBG folder. Agencies are notified of scheduled monitoring through the processes specified in the Annual Organizational Standards Review and Triennial Review sections that follow.

#### e. Annual Organizational Standards Reviews

In accordance with OCS IM 138, OCFS assesses the status of CAAs in meeting all COE Organizational Standards annually. Per OCFS contract, self-assessments with supporting documentation are due January 1. Once Agency Self Assessments are submitted, OCFS staff conducts its desk-level review and validates CAA self-assessment responses. The validation process may include follow-up with a CAA to clarify documentation provided and/or discuss a Technical Assistance Plan (TAP) which gives the CAA the opportunity to move to a "Met" status on any standards OCFS determines are "Not Met". The process closes with issuance of a monitoring report within 12 weeks of the CAA submitting their self-assessment and supporting documentation. The final report includes any TAP items negotiated between OCFS and the CAA.

Note: CAAs scheduled for triennial on-site monitoring are assessed similarly on the status of Organizational Standards but follow the process outlined in the next section. For both annual Organizational Standards reviews and triennial reviews, OCFS may collaborate efforts to assess the overall health of a CAA.

#### f. Triennial Reviews

OCFS's triennial on-site monitoring provides an in-depth, point-in-time assessment of a CAA's organizational capacity and compliance. To conduct on-site reviews, OCFS utilizes comprehensive in-depth monitoring and assessment tools, which incorporate the COE Organizational Standards, as well as state contractual and regulatory requirements. On-site reviews are structured to include areas which align with the COE's three thematic groups and nine categories of standards for private, nonprofit eligible entities:

Maximum Feasible Participation Category 1: Consumer Input and Involvement Category 2: Community Engagement Category 3: Community Assessment

Vision and Direction Category 4: Organizational Leadership Category 5: Board Governance Category 6: Strategic Planning

#### **Operations and Accountability**

Category 7: Human Resource Management Category 8: Financial Operations and Oversight Category 9: Data and Analysis Typically, the triennial monitoring process begins with the release of the current fiscal year *Agency Self-Assessment for Organizational Standards.* CAAs provide supporting documentation for these standards for OCFS's desk review.

Once the CAA submits their Agency Self-Assessments, OCFS conducts its desk-level review and prepares follow-up questions for the CAA on-site visit. The day of the on-site visit, OCFS meets with the agency to discuss the prepared follow-up questions and allows the agency to submit additional documentation to move to a "Met" status on any standards determined "Not Met". OCFS also performs a review of employee human resources files, client files, and various fiscal reviews on site as needed. After the on-site visit, OCFS completes its validation of the CAA's self-assessment, taking into consideration any additional information provided by the CAA.

A written, preliminary report, including findings, observations, and/or recommendations, will be provided to the EE electronically <u>within 60 calendar days</u> of the conclusion of the on-site review. Since the reviews are conducted in collaboration with DHHS' Division of Audit, OCFS will follow up with Audit regarding their review, to ensure any necessary feedback is incorporated. The EE will have the opportunity to comment on the content of the preliminary report. Comments must be received from the grantee <u>within 30 business days</u> upon receipt of the preliminary report. The comments may include additional documentation to address unmet standards and/or indicators. Upon receipt of comments, a final report will be prepared and issued to the EE. The final report will include comments received from the grantee.

Following the assessment process, if the State finds an EE is not meeting a standard or set of standards, the State's response will depend on the circumstances. In cases in which the EE may be able to meet an unmet standard in a reasonable timeframe, OCFS will prepare a Continuous Improvement Plan (CIP) listing recommendations for the unmet standards. The OCFS CSBG Grant Administrator and Fiscal Representative (if applicable) will verify progress made by the agency in carrying out the recommendations in the plan during regularly scheduled visits, meetings, phone conferences, etc.

In cases in which the EE may be able to meet an unmet standard in a reasonable timeframe contingent on some targeted, technical assistance, the State and EE may develop a Technical Assistance Plan (TAP) to target training and technical assistance resources and outline a timeframe for the entity to meet the standard(s).

If appropriate, the State may initiate action in accordance with section 678C of the CSBG Act (42 U.S.C. § 9915), including issuance of a Notice of Deficiency and the establishment of a Quality Improvement Plan (QIP) with clear timelines and benchmarks for progress.

\*The failure of an EE to meet multiple standards, or in cases where one or more serious findings or deficiencies (including but not limited to, contractual non-compliance, non-compliance with Federal or State laws, non-compliance with agency bylaws, financial irresponsibility, failure to adequately provide services, conversion, fraud, corruption or abuse) may reflect deeper organizational challenges and risk. In those cases, OCFS will notify HHS, Office of Community Services and determine whether it may be necessary to take additional actions, including initiating action to reduce or terminate funding, in accordance with section 678C of the CSBG Act (42 U.S.C. § 9915; see also, CSBG IM 116, "Corrective Action, Termination, or Reduction of Funding," issued May 1, 2012).

The current Triennial Monitoring Tool, *Maine OCFS CSBG Programmatic Monitoring and Standards Assessment Tool and Report*, can be found in the OCFS shared drive CSBG folder.

#### g. Fiscal Reviews

CAA fiscal reviews are generally conducted through multiple means. First, CAAs are required to submit quarterly fiscal reports illustrating budget versus actuals to OCFS throughout the contract year. These reports are reviewed and approved by DCM identified Point of Contact. Second, OCFS conducts annual reviews of Organizational Standards, which includes all standards in Category 8: Financial Operations and Oversight. Finally, fiscal monitoring reviews are conducted in accordance with OMB Uniform Guidance 200.331 - Requirements for pass-through entities via DHHS Division of Audit to evaluate subrecipient compliance with Federal Statutes, regulations, and the terms and conditions of their subaward.

#### h. Tripartite Board Monitoring

OCFS generally conducts tripartite Board monitoring through multiple means including: Quarterly Board Attendance Reporting, ongoing reviews of Board meeting minutes, periodic Board meeting visits, and reviews of Board governing documents submitted as part of annual Organizational Standards reviews and triennial assessments.

The following outlines specific processes that may be utilized for Board monitoring:

 <u>Selection and Composition</u> - OCFS monitors CAA compliance with Board selection and composition requirements specified in state regulation as well as Section 676B of the federal <u>CSBG Act</u> during annual Organizational Standards and triennial reviews.

Monitoring for each CAA includes two parts: 1) a review of the agency bylaws, and 2) a

review of agency compliance with their bylaws.

- Board Minutes/Meeting Materials State regulation requires approved Board meeting minutes and materials (agenda, financial reports, etc.) "be submitted to the Department" prior to the meeting and after ratification of the minutes. CAAs upload and email board documents directly to the CSBG State Coordinator. CSBG State Coordinator reviews Board meeting information and uploaded materials submitted and asks any applicable questions to the agency.
- Board Meeting Visits The CSBG State Coordinator generally attends Board meetings in conjunction with a scheduled triennial review process, and at a minimum, annually per agency.

## IX. Training and Technical Assistance

As part of the CSBG State Plan submitted to OCS, OCFS includes a description of plans for delivering CSBG-funded training and technical assistance (T/TA) to CAAs during the two-year State Plan period. A report on actual assistance provided is submitted to OCS each year as part of the CSBG Annual Report. Additionally, in the fall of each year, OCFS and the State Association (MCAA) typically collaborate to complete a State T/TA Plan that is submitted to RPICs inform our national partner's understanding of and planning for the CSBG Network's overall investment in T/TA. OCFS and MCAA coordinate to ensure information reported in the CSBG State Plan and Annual Report aligns with information reported on the T/TA Plan submitted to the RPIC.

## X. Discretionary Funds

As part of the CSBG State Plan submitted to OCS, OCFS includes a description of plans for the use of remainder/discretionary funds during the two-year State Plan period. A report on actual use of remainder/discretionary funds provided is submitted to OCS each year as part of the CSBG Annual Report. Information regarding spending is compiled by CSBG State Coordinator in conjunction with OCFS' Program Fiscal Officer. Both the State Plan and Annual Report include a breakdown of funding and activities for categories a.—h. listed below:

- b. Coordination of State-operated programs and/or local programs-
- c. Statewide coordination and communication among eligible entities
- d. Analysis of distribution of CSBG funds to determine if targeting greatest need
- e. Asset-building programs

f. Innovative programs/activities by eligible entities or other neighborhood groups

- g. State charity tax credits
- h. Other activities

At this time, Maine contracts remaining discretionary and administration funds for training and technical assistance purposes to the Maine State Association. However, many states provide the discretionary funding to the agencies for special work to be conducted. Maine could utilize the contract process for remainder/discretionary funding as stated below:

- 1. Potential grantees submit written requests for funds to the OCFS State Coordinator who reviews and makes a determination with other staff present. Requests are accepted on a rolling basis and must include at a minimum an explanation of the need for the project, a project description, a tentative work plan, and budget.
- 2. When an award is made, a workplan and budget is created and submitted as an amendment to the original contract.
- 3. Upon receipt of each quarterly report and fiscal reports, each agency will submit an update of special project.

## XI. Internal Controls

The policies and procedures outlined above are specific to CSBG. For further details on internal controls applicable to the entire Department of Health and Human Services, refer to the DHHS Division of Audit; <u>https://www.maine.gov/dhhs/audit/index.shtml</u>.

## XII. <u>Appendices</u> Appendix A – OCFS CSBG Risk Assessment Evaluation

Subrecipient Name:\_\_\_\_\_

Assessment Approved By:\_\_\_\_\_

#### Assessment Completed By:\_\_\_\_\_ Date Approved:\_\_\_\_\_

Grant Name(s) - CFDA(s) applicable to subrecipient CSBG – 93.569

Date of last monitoring visit (if applicable):

Click here to enter text.

RISK ASSESSMENT	<u>CSBG</u>
1. Has the subrecipient's key personnel (i.e., ED/CEO, Deputy/COO, CFO/Fiscal Dir., HR, Planner, etc.) changed since the last monitoring?	🗆 Yes 🗌 No
2. Have more than two funding cycles (CSBG) passed since the subrecipient had an on-site monitoring visit?	🗆 Yes 🛛 No
3. Were there findings/violations from the last monitoring that indicate a higher level of risk*, or were there recurring unresolved findings reported from previous monitoring? *Findings indicating a higher level of risk may be result of a OCFS monitoring visit or outside audit (e.g. Office of the Inspector General, State Auditor, and Government Accounting Office). High risk findings include those that could have significant impact on subrecipient's program compliance, including client/vendor payments, eligibility determinations, and benefits received.	□ Yes □ No
4. Is the subrecipient new to operating these program funds for OCFS (has not done so within the past year)?	🗆 Yes 🛛 No
5. Did the subrecipient fail to submit the Single Audit report to OCFS within 180 days of the end of the subrecipient's fiscal year?	
6. Were there any findings reported in the most recent Single Audit report (see Summary of Auditor's Results page included in the attached Single Audit Report)?	🗆 Yes 🛛 No
If any "YES" responses were selected in the applicable Grant column, the subrecipient's assessment should be "High Risk"	<ul><li>Low Risk</li><li>High Risk</li></ul>
If a "YES" response was selected but subrecipient is not considered to be "High-Risk," please explain:	
Based on results of this assessment and other factors, type of monitoring to be performed:	<ul> <li>Desk Review</li> <li>On-site</li> <li>Both</li> </ul>

#### \*This form is only for the internal use of OCFS staff working with the CSBG program\*

## Appendix B – Checklist for Planning the On-Site Visit

#### 1 – PROGRAM SPECIALIST SENDS ENGAGEMENT LETTER WITH APPROPRIATE ENCLOSURES

- Engagement Letter
- Draft Agenda
- List of Requested Documents
- Agency Profile
- Monitoring Tool that includes;
  - Organization Standards Assessment
  - Financial Assessment
  - Board Questionnaire
  - and inquiry topics
- **D** Requested Documentation can be, but not limited to:
  - Documents, data, and systems to be returned with the questionnaire;
    - ✓ Most recent Board Roster
    - ✓ Most recent board Minutes
  - Documents, data, and systems to be made available for onsite monitoring as they related to CSBG
    - ✓ Most Recent CSBG Application and work plan
    - ✓ Award notification(s) and copy of executed contract/amendments
    - ✓ Client eligibility requirements
    - ✓ Documentation of participation by low income and or homeless individuals in the planning process.
    - ✓ Documentation of current corrective action plans and audits with accompanying descriptions of progress to date, if applicable.
    - ✓ Agency service referral list (for review)
    - ✓ List of all client files for the monitor to choose from.
    - ✓ Copy of the latest employee and Director's evaluation/appraisal.
    - ✓ Documents related to any termination of federal or state funding in the last year
    - ✓ If there are changes, please provide the new organizational Chart that relates to the department or agency carrying out the CSBG.
    - ✓ Board member packet
    - ✓ Employee policies and procedures

#### 2 - OTHER PRE-VISIT PREPARATORY TASKS:

#### Review pertinent materials in the agency's contract file including:

- The contract and any applicable amendments
- □ CSBG Work Plan/Scope of Work
- Approved budget by categories
- Progress & financial reports

Review the following board documents

- Last year's board roasters
- Last year's board minutes
- Last year's board by-laws

Note timeliness of agency's submission of required reports, review previous site visit reports including any follow-up documentation, review agency's most recent independent audit report and any other available monitoring reports such as Head Start.

Gather all forms, instruments, and other information needed for the site visit, such as monitoring tools, checklists, client list for programmatic and administrative points and guide.

#### 3 – Complete Pre-Visit Monitoring Tool and Finalize Agenda

- Complete Pre-Visit Tool
- Make Notes of unknown areas to complete during the visit
- **G** Finalize agenda based on Pre-Monitoring Questionnaire
- Send finalized agenda to agency

## Appendix C – Sample Site Visit Notification Letter

Agency Name Name Chief Executive Officer Agency Name Address City, ME Zip code

#### Re: FY CSBG Monitoring Notification Confirmation Letter

#### Dear Insert Name Here:

The Office of Child and Family Services (OCFS) will be conducting an on-site monitoring visit with your agency regarding the Community Services Block Grant program for **fiscal year 20XX**. The visit is scheduled for **July XX and XX, 20XX.** We appreciate your cooperation and partnership in the CSBG networks efforts to maintain quality services and standards.

Attached to this letter you will find the following documents:

- ✓ Agency Profile (please have available for our visit)
- ✓ Monitoring Tool which includes a list of the organizational standards and correlation documentation you should have ready for our review.
- ✓ List of other documentation to have ready for our review (these documents may be reviewed during or after the visit).
- ✓ Tentative CSBG Site Review Agenda

This on-site visit should take most of two business days. The purpose of this visit is to review and discuss the following documents for program compliance:

- ✓ Your agency's current program application/work plan/amendments
- ✓ Award notification(s) and executed contract
- ✓ Any relevant correspondence regarding the CSBG contract
- ✓ Any financial reports related to this fiscal year funding
- ✓ For review and discussion progress reports, client files and other documents pertaining to this program

The following are instructions regarding the preparation and assessment of the Organizational Standards issued by the Federal OCS:

- 1- Each CAA is responsible to review each Standard and prepare the documentation that is required.
- 2- Each question will be verified by the OCFS State Coordinator using required documentation.
- 3- If there are standards that your organization believes it cannot meet due to a lack of capacity, resources, please inform OCFS prior to or at the monitoring visit.

The State CSBG State Coordinator is requesting that the following individuals be available to participate during the time of the monitoring, if possible:

- Agency Executive Director/CEO
- Financial Manager or equivalent
- HR Manager or equivalent
- CSBG Program Manager or equivalent,
- Other staff who are billed to CSBG

Lastly, if you have any governing/advisory board meetings during the dates of the review, please let me know.

I am looking forward to meeting with you, your staff, and any board members you wish to be in attendance for this visit. Please feel free to call me if you have any questions or concerns regarding my upcoming visit.

Sincerely,

Christa Elwell, LMSW Business Services Manager Maine Department of Health and Human Services Office of Child and Family Services #11 State House Station Augusta, ME 04333-0011 Telephone (207) 724-7900 Christa.elwell@maine.gov

## Appendix D - CSBG Agency Profile

(to be filled out by EE)

### **General Information:**

Agency Name:	
Main Office Address:	
Main Office Town, State, Zip	
DUNS Number:	
Telephone Number:	
Fax Number:	
Web Address	

## Administration:

Executive Director/CEO	
Email	
CSBG Point of Contact	
Email	
Chief Fiscal Officer	
Email	
Board Chair	
Email	

## **Fiscal Information**

Contract Number	
Total Agency Annual Budget	
CSBG Annual Allocation:	

Current Assets-to-Current Liabilities Ratio: \_\_\_\_\_

## Personnel: (Attach agency-wide organizational chart)

Total Full Time Staff	
Total CSBG Funded FT Staff:	
Total Part Time Staff	
Total CSBG Funded PT Staff:	
Total Program Volunteers	
Average Annual Volunteer Hours	

## Facilities:

Years at current location:		
🗆 Rent	□ Own	□ Lease
Is the building owned by a subsidiary/delegate?	□ Yes	□ No
If owned, are there other tenants in the building?	□ Yes	□ No
If So, Who are the tenants?		

# List name and locations of other offices, neighborhood/outreach centers, Head Start Sites, and delegate agencies:

Name:	Address:

#### **Service Delivery:**

Date the most current Community Needs Assessment was completed:	
Was an update completed? If so, date?	
Date the most recent Strategic Plan was completed:	
Name of Counties being served by agency?	

#### Indicate which population(s) your organization serves with CSBG funds (676(b)(1)(A)):

 $\Box$  Low-income individual and families

□ Homeless individuals and families

□ Migrant or Seasonal individuals and families

□ Elderly low-income individuals and families

Indicate which Federal Objectives are being met through CSBG program operations:		
Employment     Emergency Services		
□ Education	□ Linkages	
Income Management	□ Self-Sufficiency	
□ Housing	□ Health	

Indicate which National Goals are being met through CSBG program operations:
□ Low-income individual and families
□ Homeless individuals and families
□ Migrant or Seasonal individuals and families
Elderly low-income individuals and families

#### How are services and activities provided to low-income people?

Direct Services and Activities?	□ Yes	□ No
Direct Services through partnering agencies?	□ Yes	□ No
If so, how many partner agencies?		
List partner agencies:		

**Comments:** (Note any special circumstances such as agency restructuring, transition of leadership, financial difficulties, or staff turnover, etc. that should be taken into consideration during the assessment.)

Briefly describe, what is the agency's current assessment of its progress towards accomplishing the objectives of its CSBG related programs as stated in the Application and Work Plan?

Does the agency have adequate staff assigned to administer the CSBG program activities effectively and efficiently?

What skills gaps, if any, is the agency experiencing in its staff?

#### What services does your agency offer that are duplicated in your service area?

Describe how an individual experiencing poverty uses your services and comes out more economically stable and is no longer considered in poverty? (Please provide a general flow of how this happens and two examples of how this has happened)

Please list any current Corrective Action Plans (CAPL), Technical Assistant Plans (TAP), Quality Improvement Plans (QIP), or unresolved findings (UF) or compliance issues previously brought to the agency's attention that are unresolved or have been resolved since the last monitoring visit. These plans and findings will result from monitoring or Organizational Standard Assessments.

## Appendix E – Board Monitoring Tools

Reporting	Yes	No	Comments:
Is the agency submitting reporting per contract terms?			
Quarterly Financial Reports			
Quarterly NPI Results Reports			
Quarterly Performance Measure Reports and Provider Packets			

Agency Tripartite Board	Yes	No	Comments:
Does CSBG State Office have a copy of the most recent Board roster?			
Does the Board roster include the name, title, address,			
sector represented, date appointed or elected, and			
term			
expiration date (if applicable) for all Board members?			
Does the Board consist of 1/3 "Recipe" Stated in the State Statue			
and CSBG Act:			
"Each community action agency shall establish a governing board of directors, which must consist			
of not less than 15 nor more than 30 members. One third of the members must be			
representatives of low-income residents of the service area who are selected through a			
democratic process in accordance with guidelines established by the bureau. <u>One third</u> of the			
members must be elected public officials or their designees or officials of public agencies			
operating in the service area. One third of the members must be representatives of private sector			
organizations, including business and industry, as well as educational, civic, labor and religious			
organizations. All meetings of the board of directors must be in accordance with the freedom of			
access laws."			
Do By-laws specify a method for selection that is			
appropriate for each Board sector? (review by-laws)			
Do By-laws state that written advance notice, including an			
agenda, shall be given to the Board members and CSBG State			
Office at least 5 days in advance of Board meetings? (Review			
By-Laws)			
Have all Board Agendas been submitted to CSBG State Office 5			
days prior to the board meeting?			
Have all Board Minutes been submitted to CSBG State Office			
within 15 business days of ratification?			

Board Minutes	Yes	No	Comments
Do the Minutes Contain the Following:			
Date, Time, Location	h		
Regular or Special Meeting	3		
Number and Name of Attendee	s		
Presence of a Quorum	1		
Guests in Attendance	2		
Action on Minute	s		
Major proposals and the actions taker	1		
Treasures Repor	t		
Major Discussion:	s		
Executive Committee Report	s		
Compensation and Performance Management Decision	s		
Do Minutes list Board members in attendance & absent?			
Do the Minutes indicate that the agency's Board fully			
participates in the development, planning, implementation, and			
evaluation of the CSBG program?			
Do the Board By-laws establish procedures under which a low-			
income individual or organization serving low income			
individuals may petition for adequate representation?			
Agency Capacity and Financial	Yes	No	Comments
Are all staff positions identified in the CSBG Contract			
application, and any amendments thereto, filled?			
Is the agency gathering and tracking all information needed to complete the CSBG program reports?			
Are program outcomes sufficiently documented?			
If reported expenditures exceed budgeted amounts by line			
item, has the agency requested an amendment to the original			
budget and/or provided adequate explanation for any			
significant variances?			
Are expenditures reported by the agency to date within the			
budgeted amounts by category per the contract?			

## CSBG Eligible Entity Board Meeting Attendance Report

Agency:	
Contract #:	
CSBG State Program Representative:	

Meeting Called to Order (date/time):	
Meeting Chaired by:	
Current Size of Board:	
Total # present:	

Were meeting notice, agenda, & minutes distributed prior to the meeting?	
How far in advance?	
Was attendance taken?	
Title of person keeping attendance:	
Was a quorum present?	

Were meeting minutes of previous meeting reviewed and approved?	
If applicable, were corrections made to previous minutes?	
Presentation of report (written, oral)	

Briefly describe the topics of the Executive Director's Report:
Recommendations for Board Actions:

Financial Report	
Is the Board provided with current financial information?	
Highlights:	

Committee Reports	
Which Committee?	
Highlights:	
Which Committee?	
Highlights:	

\* Add Additional if needed

Program Reports		
Which Program?		
Highlights:		

\*Add Additional if needed

Old/New Business		
Topic (s):		
Highlights:		

Time Adjourned:	
Was the prepared agenda followed?	

Program Representative Comments/Observati	ons:

*Staff that may be involved: Program Manager and/or Case Manager				
SUMMARY OF REVIEW OF CLIENT FILES				
Address the following questions after reviewing a sampling of				
client files:				<b>6</b>
	Yes	No	N/A	Comments
Are client files complete, on-site, and available for inspection				
by OCFS staff				
Request 5-10 client fil	es for	reviev	Ν.	
Utilize the CSBG Records Review Worksheet (a	t the e	nd of	this d	ocument) for each file.
Do client files, at a minimum, contain the following documents and				
information:				
Intake application (including demographic data)				
Household income				
Gross income for all household members over 18				
Source documentation for determining income and income				
types and amounts				
Calculations used to determine annualized gross income				
Type of service or assistance				
Date(s) of service				
A plan for moving the client toward self-sufficiency				
Follow-up information				
Review of service(s) provided and impact on the individual or				
family				
Referrals and follow-up				
Current poverty guidelines	;			

#### \*Staff that may be involved: Program Manager and/or Case Manager

Did the review of the client files sampled indicate that all		
clients provided services were eligible?		
If not, indicate the number of clients determined ineligible		
and/or unverifiable in each service category.		
Is there evidence that applicants were apprised of grievance procedures if services were denied?		
Is a client file maintained for each person served?		
Does the form used for determining client eligibility identify all		
eligibility criteria and the documentation used in making the determination?		
For clients receiving direct services, is income documented for all members of the household 18 years and older?		
Is there evidence in the client files reviewed that the agency has		
procedures in place to verify income amounts and family size as		
stated in the application?		
Does the agency limit eligibility to clients at or below 125% of the	e	
HHS poverty guidelines?		
Are proper procedures in place for case management, and is		
adequate client information and follow-up documented?		
Does the agency link with other programs in the community when services required are beyond the agency's scope?	en la	
Are persons first-time served and service units being counted		
correctly?		
Is the agency taking appropriate steps to ensure privacy and		
confidentiality of client information, such as secure files,		
confidentiality policies, private consultation space, etc.?		
Are client records maintained for at least three years?		
Did the review of the documentation indicate that the services		
have impacted on client self-sufficiency?		

## CSBG Client Records Review Worksheet

Client #								
Review an adequate number of client file that are randomly picked from a list of client files provided by the agency.	Yes	No	Yes	No	Yes	No	Yes	No
Are the client demographic characteristics adequate (Age / Ethnicity / Gender / Education / Household / Relationship status)?								
Is income documented for all members of the household 18 years and older?								
Are the documents used to verify income appropriate and allowable?								
Is the client above or below the 125% (do the calculations)?								
Does the file contain information regarding types of assistance and dates of services provided?								
Is there a log describing the nature of the services provided, including the date and amount of such services?								
Are copies of the payment method retained in the file for services provided (bill, voucher, copy of check, etc.)?								
Are the services that CSBG was billed for consistent with the program narrative and scope of work?								
Are service follow-ups documented?								
Was the client referred to other agencies for services that the CAA could not meet?								
Are these referrals documented?								
If the client was served for a year or more, did the agency obtain a new application 12 months after the origination of services?								
Are case management activities documented?								
Are there stated goals for sustainability for services offered more than twice?								
Is there evidence that the stated goals are or were achieved?								
Does the client signature section of the intake form include a self- declaration statement that the information provided is true and correct?								