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I. FEDERAL FISCAL YEARS COVERED BY STATE PLAN & APPLICATIONS

The Community Services Block Grant (CSBG) State Plan covers FY2015 and FY2016 (October 1, 2014 thru September 30, 2016).

INTRODUCTION - Federal Overview

The enactment of the CSBG (through the Omnibus Budget Reconciliation Act of 1981, Public Law 97-35) replaced the following eight categorical programs and shifted the administrative responsibility to the states: Local Initiative, Community Food and Nutrition, Senior Opportunities and Services, State Agency Assistance, Community Economic Development, National Youth Sports, Housing and Community Development and the Rural Development Loan Fund.

The purpose for which states are authorized to use CSBG funds, as stated in the law, as amended, is “to provide assistance to States and local communities, working through a network of community action agencies and other neighborhood-based organizations, 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 (particularly families who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act). Major provisions of the CSBG Act, as amended, include the following:

- States are required to use the block grant funds to implement programs that may have a measurable and potentially major impact on the causes of poverty such as: to assist people who lack adequate employment, education, and housing; to assist in meeting emergency needs; and to remove obstacles and solve problems which block the achievement of self-sufficiency.

- Procedures are to be established for planning, public participation, applications, and coordination, which states must meet in order to qualify for block grant assistance.

- States are allowed to use up to 5 percent of their block grant funds for state administrative expenses.

- At the inception of CSBG, there was a funding pass-through provision that required 90 percent of the state's allotment be allocated to FY 1981 Community Services Administration (CSA) designated community action agencies (CAAs), "Community Action Programs," or organizations serving seasonal or migrant farmworkers. In December 1981, this provision was amended to include CSA-designated limited purpose agencies (LPAs) which in FY 1981 served the general purposes of a CAA.

Subsequent enactment of the Coats Human Services Reauthorization Act of 1998 amended the CSBG Act to continue the 90 percent pass-through provision to these existing eligible entities or to newly designated organizations that meet the requirements...
as described in the amended Act.

The CSBG Act, as amended, defines eligible entities as being:

(a) An eligible entity described in section 673(1) that was in effect on the day before the Reauthorization Act of 1998 (which would include the following – as paraphrased);

- Any CAA which maintained its CAA designation in FY 1981 (or any CAA which came into existence during FY 1982 as a direct successor in interest to) and did not subsequently lose its designation for compliance reasons.

- Any LPA designated under Title II of the EOA for FY 1981 which served the general purposes of a CAA and did not subsequently lose its designation for compliance reasons.

- Any grantee which received financial assistance under Section 222(a)(4) of the EOA in FY 1981.

- Any organization which received an FY 1984 grant from a state which actually obtained a waiver from HHS in FY 1984.

- An organization other than a presently eligible entity properly designated by the Governor to serve a previously or currently unserved area.

(b) Or is designated by the process described in section 676A of the Reauthorization Act of 1998 (including an organization serving migrant or seasonal farmworkers) that is so described or designated; and

(c) That has a tripartite board or other mechanism described in subsection (a) or (b), as appropriate, of section 676B of the Reauthorization Act of 1998.

II. LETTER OF TRANSMITTAL

See following page.
Insert Letter of Transmittal to Director, OCS.
III. EXECUTIVE SUMMARY

A. CSBG State Legislation

In 1981, the state policy makers, cognizant of the problems facing Michigan’s disadvantaged population, enacted the “Michigan Economic and Social Opportunity Act of 1981” (Public Act 230 of 1981). This legislation was amended in 2003 and in 2006. (See Exhibit B.)

- The Act created a state agency (currently the Bureau of Community Action & Economic Opportunity within the Michigan Department of Human Services) to administer the CSBG Program, provided for the designation of CAAs and prescribed the powers, duties and responsibilities of the BCAEO, a Commission on Community Action & Economic Opportunity and the CAAs.

Excerpts from P.A. 230, as amended, include: “...the bureau shall serve as a statewide advocate for social services and economic opportunities for low income persons...” “The commission shall provide an opportunity for low income persons to actively participate in the development of policies and programs to reduce poverty.” “...A community action agency shall serve as a primary advocate for the reduction of the causes, conditions, and effects of poverty and shall provide social and economic opportunities that foster self-sufficiency for low income persons...”

- Eligible Entities/CAAs

Federal law, under the amended CSBG Act, requires that not less than 90 percent of the funds made available to a state shall be used to make grants to eligible entities as defined in the Act. The law does not specify the method to be used in allocating funds to these entities/subgrantees.

In Michigan, the current eligible entities are the 29 CAAs, which provide services and resources to all of the state’s 83 counties. For FY2015-16, a minimum of 90 percent of CSBG funds will be passed through to the 29 CAAs. Through an RFP process, Wayne Metro CAA is currently the interim provider for the City of Detroit. BCAEO is working with the City of Detroit to choose a permanent CAA by FY15.

CAAs and their Mission

Community Action was the cornerstone of the Economic Opportunity Act of 1964 and CAAs were formed as the catalysts to bring about Community Action. They were created by local communities to develop local solutions to poverty problems and to enable those communities to address the barriers to self-sufficiency encountered by their low-income citizens. CAAs bring together local citizens, including low-income persons, to provide the community with a voice
regarding the opportunities that will best help all of their members to be self-sufficient, productive and contribute to community life.

In Michigan, CAAs accomplish these tasks through the participation of low-income citizens, their advocacy efforts, their programs of service and the statewide support of over 1.9 million volunteer hours each year from their communities and the private sector. (Based on the federal established rate of $22.13/hour for Michigan, the volunteer hours are valued in excess of $42 million.) With respect to their increasing vision and role in their communities: They are the largest service provider for senior citizen programs, operate nearly 40% of all Head Start programs, are the largest emergency food provider network, are the largest provider of energy conservation programs, and provide immediate crisis assistance for families for shelter, food, heat, health care, transportation, etc. They have become increasingly involved in the development, rehabilitation and repair of low-income housing.

While the operation of low-income programs is a major CAA activity, it is not their primary purpose. The CAA is a local decision-maker, linking community residents, the systematic assessment of local needs, community-wide response, and service delivery. It is this commitment to our communities and their residents that distinguishes CAAs from other human service agencies.

Hence, their effectiveness can be measured not only by the services which they directly provide but, more importantly, by the improvements and changes they achieve in the community's attitudes and practices toward the poor, elderly, and disabled and in the allocation and focusing of public and private resources for anti-poverty purposes.

The CAAs' mission involves a balance between strengthening communication and cooperation on the one hand and coming to grips with serious problems and deeply felt differences on the other. CAAs address critical issues and deal with unpleasant realities. In performing their role as an advocate for their constituency, CAAs must carefully choose the issues on which they take stands and the tactics employed so as to maximize the chances for success.

The overall image of CAAs in the community should be that of a positive voice for their constituency. In all of their activities, CAAs should strive constantly to reduce the isolation of the population they serve and to improve communications with the community at large. CAAs' ultimate responsibility should not be to simply speak for their constituency but to assist them to effectively speak directly for themselves. It is the responsibility of CAAs to provide their constituency with the support and assistance necessary to participate meaningfully in the affairs that affect their lives.
Local Participation in the CAA Decision-Making Process

To carry out their mission effectively, CAAs work with three significant sectors in the community: consumer/low-income, public, and private.

1. Consumer Sector Participation

The consumer sector includes the low-income, elderly, and disabled. CAAs' plans and programs must be developed and implemented with the maximum feasible participation of the residents of the areas and members of the groups served. Such participation is essential to ensure that community changes and improvements which CAAs promote are in fact responsive and relevant to the low-income citizens to whom they are addressed. It is, therefore, central to CAAs' mission to strengthen the self-help capability of the consumer sector and to provide it the opportunity and support to participate effectively—through both the CAA and its neighborhood and target area organizations, and in CAA or non-CAA programs which affect its interests.

2. Public Sector Participation

Regardless of whether a CAA is a public or private nonprofit agency, its effectiveness depends heavily on its ability to work closely with, and enlist the support of, state and local public officials and agencies. CAAs shall inform the state, units of government and appointed bodies, private agencies, organizations and citizens of the nature and extent of poverty within their respective service areas. No community can be fully responsive to the needs of the consumer sector without the active participation and cooperation of its duly elected or appointed officials. In this regard, it is also essential that CAAs develop a close-working partnership with MDHS local offices and local representatives of other state and federal agencies serving the same population.

3. Private Sector Participation

The consumer and public sectors cannot succeed without the resources of the private sector. Therefore, CAAs must enlist the support and participation of business, labor, faith-based organizations and civil rights groups, public and private social service agencies, health and welfare councils, civic and service organizations, foundations, universities and private citizens.
CAA Local Planning Process

In developing strategies and plans, CAA officials must take into account areas of greatest community needs, availability of resources and the CAA's strengths and limitations. CAAs must establish realistic, attainable objectives (consistent with their mission) expressed in concrete terms, which permit the measurement of results.

To the extent feasible, CAAs shall coordinate their plans with those of other agencies and institutions responsible for poverty-related programs and assist such agencies and institutions in developing their own plans and carrying out their own missions. While the operation of programs is a principal CAA activity, it is not the CAA’s primary purpose. CAA programs must serve the larger purpose of mobilizing resources and bringing about greater institutional sensitivity. This critical link between service delivery and improved community response distinguishes CAAs from other antipoverty agencies. Using their programs as a base, CAAs have become a focal point for increased community concern and greater community commitment to reduce poverty.

B. Designation of Lead Agency to Administer the CSBG Program

Designated State Lead Agency: Michigan Department of Human Services (MDHS)  
(See Exhibit A)
Director/Administrator of Lead Agency: Maura D. Corrigan, Director

C. Public Hearing Requirements

1. Public Comment [Section 676(a)(2)(B)]: Notices were published in 3 newspapers across the state indicating that the FY2015-16 CSBG State Plan was available (posted) on the MDHS website and that written comments could be submitted through July 18, 2014. (See Exhibit C - Notice of Public Comment) The Notice also indicated that the State Plan is available at CAAs throughout Michigan. The Notices were published in the following city newspapers:

Muskegon: Muskegon Chronicle
Oakland: The Oakland Press
Marquette: The Mining Journal

The MDHS website published the Public Hearing notice on July 1, 2014. The Public Hearing was held on July 9, 2014 from 1:00 pm to 2:00 pm in Lansing Michigan (See Exhibit C – Notice of Public Comment)
2. **Legislative Hearings** [Section 676(a)(3)]:

   The CSBG Budget appropriation is part of the MDHS Budget process.

   **Senate Appropriations Subcommittee**
   The Senate Appropriations Subcommittee reviewed and reported out the FY2015 MDHS budget appropriations that was approved on May 8, 2014.

   **House Appropriations Subcommittee**
   The House Appropriations Subcommittee reviewed and reported out the FY2015 MDHS budget appropriations that was approved on May 14, 2014.

3. **Public Inspection of State Plan** [Section 676(e)(2)]: The state plan was posted on the MDHS public web site and distributed to the 29 Michigan eligible entities (CAAs) and the state CAA association (Michigan Community Action Agency Association/MCAAA).
IV. STATEMENT OF FEDERAL and CSBG ASSURANCES

CSBG Programmatic and Administrative Assurances

and

Other Administrative Certifications

As part of the annual or biennial application and plan required by Section 676 of the Community Services Block Grant Act, as amended, (42 U.S. C. 9901 et seq.) (The Act), the designee of the chief executive of the State hereby agrees to the Assurances in Section 676 of the Act.

A. PROGRAMMATIC ASSURANCES

1) Funds made available through this 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 part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families to enable the families and individuals to:

   (I) remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency 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) secure and retain meaningful employment;

   (iii) attain an adequate education, with particular attention toward improving literacy skills of low-income families in the communities involved, which may include carrying out family literacy initiatives;

   (iv) make better use of available income;

   (v) obtain and maintain adequate housing and a suitable living environment;

   (vi) obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs; and

   (vii) 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 law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;
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

c) To make more effective use of, and to coordinate with, other programs (including State welfare reform efforts). [676(b)(1)]

2) To describe how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in Section 675C(b) of the Act in accordance with the community services block grant program, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of the community services block grant program; [676(b)(2)]

3) To provide information provided by eligible entities in the State, including:

a) a description of the service delivery system, for services provided or coordinated with funds made available through grants made under Section 675C(a) of the Act, targeted to low-income individuals and families in communities within the State:

b) a description of how linkages will be developed to fill identified gaps in services, through the provision of information, referrals, case management, and follow-up consultations;

c) a description of how funds made available through grants made under Section 675C(a) will be coordinated with other public and private resources; and,

d) a description of how local entities will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of the community services block grant, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting. [676(b)(3)]

4) To ensure 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. [676(b)(4)]

5) That the State and the 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 to low-income individuals and to avoid duplication of such services, and State and the eligible entities will coordinate the provision of employment and training activities in the State and in communities with entities providing activities through statewide and
local workforce investment systems under the Workforce Investment Act of 1998; [676(b)(5)]

6) To 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 communities. [676(b)(6)]

7) To permit and cooperate with Federal investigations undertaken in accordance with section 678D of the Act. [676(b)(7)]

8) That any eligible entity in the State that received funding in the previous fiscal year through a community services block grant under the community services block grant program 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) of the Act.[676(b)(8)]

9) 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. [676(b)(9)]

10) To 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. [676(b)(10)]

11) To secure from each eligible entity in the State, as a condition to receipt of funding, 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; [676(b)(11)]

12) 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) of the Act.[676(b)(12)]

13) To provide information describing how the State will carry out these assurances. (676(b)(13)] (This is the Narrative CSBG State Plan)

**B. ADMINISTRATIVE ASSURANCES**

The State further agrees to the following, as required under the Act:
1) To submit an application to the Secretary containing information and provisions that describe the programs for which assistance is sought under the community services block grant program prepared in accordance with and containing the information described in Section 676 of the Act. [675A(b)]

2) To use not less than 90 percent of the funds made available to the State by the Secretary under Section 675A or 675B of the Act to make grants to eligible entities for the stated purposes of the community services block grant program and to make such funds available to eligible entities for obligation during the fiscal year and the succeeding fiscal year, subject to the provisions regarding recapture and redistribution of unobligated funds outlined below. [675A(a)(1) and (2)]

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

4) To spend no more than the greater of $55,000 or 5 percent of its grant received under Section 675A or the State allotment received under Section 675B for administrative expenses, including monitoring activities. [675C(b)(2)]

5) In states with a charity tax credit in effect under state law, the State agrees to comply with the requirements and limitations specified in Section 675C, regarding use of funds for statewide activities to provide charity tax credits to qualified charities whose predominant activity is the provision of direct services within the United States to individuals and families whose annual incomes generally do not exceed 185 percent of the poverty line in order to prevent or alleviate poverty among such individuals and families. [675C(c)]

6) That the lead agency will hold at least one hearing in the State with sufficient time and statewide distribution of notice of such hearing, to provide to the public an opportunity to comment on the proposed use and distribution of funds to be provided through the grant or allotment under Section 675A or 675B for the period covered by the State plan. [676(a)(2)(B)]

7) That the chief executive officer of the State will designate an appropriate State agency for purposes of carrying out State community services block grant program activities. [676(a)(1)]

8) To hold at least one legislative hearing every three years in conjunction with the development of the State plan. [676(a)(3)]

9) To make available for the public inspection each plan or revised State plan in such a manner as will facilitate review of and comment on the plan. [676(e)(2)]

10) To conduct the following reviews of eligible entities:
   a) full onsite review of each such entity at least once during each three year period;
b) an onsite review of each newly designated entity immediately after the completion of the first year in which such entity receives funds through the CSBG program;

c) follow-up reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards, and requirements established by the State;

d) other reviews as appropriate, including reviews of entities with programs that have had other Federal, State or local grants (other than assistance provided under the CSBG program) terminated for cause. [678B(a)]

11) In the event that the State determines that an eligible entity fails to comply with the terms of an agreement or the State Plan, to provide services under the CSBG program or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives), the State will comply with the requirements outlined in Section 678C of the Act, to:

a) inform the entity of the deficiency to be corrected;

b) require the entity to correct the deficiency;

c) offer training and technical assistance as appropriate to help correct the deficiency, and submit to the Secretary a report describing the training and technical assistance offered or stating the reasons for determining that training and technical assistance are not appropriate;

d) at the discretion of the State, offer the eligible entity an opportunity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan and to either approve the proposed plan or specify reasons why the proposed plan cannot be approved;

e) after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding to the eligible entity unless the entity corrects the deficiency. [678(C)(a)]

12) To establish fiscal controls, procedures, audits and inspections, as required under Sections 6781(a)(1) and 678D(a)(2) of the Act.

13) To repay to the United States amounts found not to have been expended in accordance with the Act, or the Secretary may offset such amounts against any other amount to which the State is or may become entitled under the community services block grant program. [678D(a)(3)]

14) To participate, by October 1, 2001, and ensure that all eligible entities in the State participate in the Results-Oriented Management and Accountability (ROMA) System [678E(a)(1)].

15) To prepare and submit to the Secretary an annual report on the measured performance of the State and its eligible entities, as described under ’678E(a)(2) of the Act.
16) To comply with the prohibition against use of community services block grant funds for the purchase or improvement of land, or the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility, as described in Section 678F(a) of the Act.

17) To ensure that programs assisted by CSBG funds shall not be carried out in a manner involving the use of program funds, the provision of services, or the employment or assignment of personnel in a manner supporting or resulting in the identification of such programs with any partisan or nonpartisan political activity or any political activity associated with a candidate, or contending faction or group, in an election for public or party office; any activity to provide voters or prospective voters with transportation to the polls or similar assistance with any such election, or any voter registration activity. [678F(b)]

18) To ensure that no person shall, on the basis of race, color, national origin or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with community services block grant program funds. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.) or with respect to an otherwise qualified individual with a disability as provided in Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 12131 et seq.) shall also apply to any such program or activity. [678F(c)]

19) To consider religious organizations on the same basis as other non-governmental organizations to provide assistance under the program so long as the program is implemented in a manner consistent with the Establishment Clause of the first amendment to the Constitution; not to discriminate against an organization that provides assistance under, or applies to provide assistance under the community services block grant program on the basis that the organization has a religious character; and not to require a religious organization to alter its form of internal government except as provided under Section 678B or to remove religious art, icons, scripture or other symbols in order to provide assistance under the CSBG program. [679]
C. OTHER ADMINISTRATIVE CERTIFICATIONS

The State also certifies the following:

1) To provide assurances that cost and accounting standards of the Office of Management and Budget shall apply to a recipient of community services block grant program funds.

2) To comply with the requirements of Public Law 103-227, Part C Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994, which requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 if the services are funded by a Federal grant, contract, loan or loan guarantee. The State further agrees that it will require the language of this certification be included in any subawards, which contain provisions for children's services and that all subgrantees shall certify accordingly.

Signature: __________________________________  Date: ________________________
Signature of Director of Designated Lead Agency

Title: Maura D. Corrigan, Director
Organization: MDHS
V. THE NARRATIVE STATE PLAN

A. Administrative Structure

1. State Administrative Agency

(a) Mission and Responsibilities of the Lead Agency:

The MDHS, formerly the Michigan Family Independence Agency, was designated the Lead Agency for the CSBG program in 1995.

MDHS Mission & Vision:

Mission Statement: Improving the quality of life in Michigan by providing services to vulnerable children and adults that will strengthen the community and enable families and individuals to move toward independence.


MDHS is Michigan’s public assistance, Child and Family welfare agency and is responsible for all state and federal public assistance benefit programs in the state, including: Family Independence Program (FIP), Day Care Services, Child Support, Foster Care, Juvenile Delinquency, Adult and Children’s Protective Services, Food Stamps/Food Assistance, Medical Assistance, Low Income Home Energy Assistance Program, State Disability Assistance, State Emergency Relief and Employment and Training.

The CSBG Program is administered through the MDHS’ Bureau of Community Action & Economic Opportunity (BCAEO). (See Exhibit E - MDHS and BCAEO Organization Charts) The BCAEO serves as a statewide advocate for social and economic opportunities for low-income persons. (See Exhibit B - PA 230 of 1981, as amended.)

The programs the BCAEO administers through the CAAs fit well with the overall mission of MDHS and include (but not necessarily limited to):

- Community Services Block Grant (CSBG)
- Department of Energy (DOE) Weatherization Assistance Program (WAP)
- Low-Income Home Energy Assistance Program (LIHEAP) [administered at the state level]
- LIHEAP Crisis Assistance (LCA) [administered at the state level]
- Also see: Statewide Initiatives, under D. and Leveraged Funds, under G.
BCAEO responsibilities include, but are not limited to:

- working within and outside MDHS to develop programs and initiatives that assist low-income families and individuals become self-sufficient;
- developing state plans, program policies, guidelines and requirements and program monitoring tools;
- reviewing local agency funding plans and applications for compliance with policy and regulations and developing grants and contracts awarding funds;
- routinely providing technical assistance to grantees regarding annual plans and budget development, compliance with policies and regulations, discretionary fund applications and reporting requirements;
- assisting CAAs to develop new program areas with discretionary funds;
- negotiating and developing discretionary contracts;
- conducting annual, or biennial comprehensive, on-site monitoring reviews and reports for each grantee;
- monitoring, review and approval of monthly grantee/contractor expenditure reports;
- supporting CAAs in understanding of ROMA;
- compiling statewide data for required grantor reports.

(b) Goals and Objectives:

The goals of the state of Michigan’s CSBG program are to assist low-income persons and families to achieve self-sufficiency and to assist communities in reducing poverty. The target population, for direct CSBG services, includes those individuals and families with incomes at or below 125 percent of the federally established poverty level. These goals are to be accomplished by providing support for services, initiatives and community activities having a measurable and potentially major impact on the causes of poverty in Michigan.

CSBG funds are used at the local level in combination with a variety of funding sources. These resources include but are not limited to:

**State Resources**

- Michigan School Readiness/Pre-School Program
- Office on Services to the Aging
- MI ENROLLS – MAXIMUS (Medicaid Clients, Enrollment in Health Plan)
- Emergency and Temporary Shelter Grants (Michigan State Housing Development Authority)
• State Emergency Services (SER) funds [from local MDHS offices]
• Michigan State Housing Development Authority (MSHDA) funds [Migrant/Season Farm worker Funds providing emergency housing assistance]
• Michigan Public Service Commission (MPSC) funds for deliverable fuel

**Federal Resources**

• Federal Head Start
• DOE Low-Income Home Weatherization Assistance Program
• Health and Human Services Low-Income Home Energy Assistance Program
• United States Department of Agriculture Commodity Food Distribution
• Federal and State Housing programs
• Community Development Block Grants
• Federal Emergency Management Agency (FEMA)
• The Emergency Food Assistance Program (TEFAP)
• Temporary Assistance for Needy Families (TANF), Food Assistance Program and Employment & Training Programs
• The US Department of Housing and Urban Development (HUD) Homeless and Shelter Programs
• Special Health and Human Services grants
• Assets for Independence Act Rural Development Funds

**Local, Public and Private Resources**

• United Ways
• Foundations
• Faith Based Organizations
• Local Community Walk-for-Warmth
• Local Units of Government
• Utility Companies
• Local Businesses
• Volunteers

2. **Eligible Entities**

The current eligible entities in Michigan are the 29 CAAs which serve all 83 counties in the state. See Exhibit J - CAA Directory and Service Area Map which includes the name, address and city/county geographic area for each CAA.

**Eligible Entity Designation Process [676A]**
The state will follow the guidelines for designating new eligible entities found in the HHS/ACF/OCF CSBG Memorandum Transmittal No. 42, Dated April 10, 2000 - Subject: Statutory requirements for designation priority of private nonprofit organizations over political subdivisions as eligible entities in unserved areas. All CAAs have been notified in writing concerning these designation requirements.

3. Distribution and Allocation of Funds For FY2015-16
All figures are based upon an estimated state allocation totaling $24,403,908 for fiscal year 2015. FY2016 will be based on FY15 final allocation.

(a) **Eligible Entity/CAA Allocation** (90% pass through)..$21,963,518

- Distributed to 29 CAAs
  - 23 Private Non-Profit Agencies (represents 79% of total funds)
  - 6 Public Agencies (represents 21% of total funds)

- See Exhibit F - Projected CAA Funding Schedule

(b) **Discretionary** (5%).........................................................$1,220,195

These funds will be utilized for various discretionary purposes including the following (projected set-aside amounts). Also see D. State Use of Retained Funds.

- Native American Projects ....................... $80,000
- CAA Projects (including Migrant and Tax)  
  and T/TA Allocations ............................. $1,140,195

Note: Discretionary and carry-forward funds will also support: Allocations to bring CAA funding levels up to a minimum amount of approximately $175,000 (dependent on final FY 2015 allocations), CAA Projects and Other T/TA.

(c) State Administrative Costs (maximum 5%) ......................$1,220,195

**TOTAL** .................................................................$24,403,908
B. Funding Criteria and Distribution Formula

1. Application for Funding

All eligible entities (CAAs) requesting CSBG funds submit a Community Action Plan (CAP) in the format prescribed by the state. Projected allocation amounts, program requirements, plan criteria, and other pertinent data are distributed annually as a CSBG item update in the MDHS’ Community Services Policy Manual (CSPM). CAAs are required to include a copy of their latest Community Needs Assessment [676(b)(11)] (the state recommends that CAAs conduct an assessment every 3 years).

Since the state is not notified of its allotment until after the CAA plans are due, the CAA plans address the expenditure of funds as identified in a “projected” allocation chart. The CAAs amend their plans during the second quarter of the year based on “final” allocations; the amended plans also incorporate the CAA’s prior year carry-forward dollars. Carry forward is identified by the State/BCAEO after its September 30 year-end closeout procedures are concluded.

The State has designated the following program categories/activities that may be supported with CSBG funds: Employment, Education, Income Management, Housing, Emergency Services, Nutrition, Linkages with Other Programs, Self-Sufficiency, Health and Central Agency Administration. These categories match those included in the annual statewide CSBG-IS Survey report submitted to the National Association for State Community Services Programs (NASCSP). There are no funding/budgeting restrictions concerning the amount of funds an agency may plan to spend under any of these program categories.

All CAA plans must demonstrate a planning process that incorporates participation of the target client groups, other social service agencies and coordination with local governments. Programs are reviewed for consistency with the proposed expenditure plan.

CAAs are given the option of conducting at least one local public hearing or providing for a public comment period to allow low-income persons, community organizations and other interested parties the opportunity to participate in formulating the agencies' community action plans. CAAs provide documentation in their plans that such a hearing or comment period was scheduled and maintain a record of all testimony and/or comments received.

CAAs will consider religious organizations on the same basis as other non-governmental organizations to provide the assistance under CSBG programs, so long as the program is implemented in a manner consistent with the Establishment Clause of the first amendment to the Constitution; will not discriminate against an organization that provides assistance under, or applies
to provide assistance under CSBG, on the basis that the organization has a religious character; not require a religious organization to alter its form of internal government except as provided under Section 678B of the Act or remove religious art, icons, scripture, or other symbols in order to be eligible to provide assistance under a CSBG program; and will ensure that no funds provided to a religious organization shall be expended for sectarian worship, instruction, or proselytization. [679]

2. Program Rules/Requirements

The annual CSBG Grant Agreements include general provisions that the CAA must abide by in order to receive funds. The provisions cover issues such as: audit requirements, insurance coverage, compliance with state and federal laws and regulations, confidentiality, termination, submission of board minutes, etc. It also includes the following assurances/documents: Governing Board Assurances; Certification Regarding Lobbying; and Certification Regarding Debarment, Suspension and other Responsibility Matters - Primary Covered Transactions. A signed Agreement must be on file prior to disbursing funds at the beginning of each CSBG program year (October 1).

Community Services Policy Manual (CSPM): For purposes of providing direction to grantees, the BCAEO maintains and continually updates the MDHS CSPM, which specifies policy and procedural requirements for all programs (CSBG, DOE, LIHEAP, and LCA). The CSPM covers, but is not limited to: conditions to receive funding, funding formula, definitions, program policy, client application and eligibility requirements, reporting requirements, fiscal accountability, performance standards and measurements, penalties for misuse of funds, appeal processes, affirmative action requirements and other applicable state and federal requirements.

3. Poverty Income Guidelines

Unless otherwise notified by the US Department of Health and Human Services (HHS), income eligibility for direct CSBG services will be determined based on 125 percent of the most recent poverty income criterion published in the Federal Register by the HHS. Grantees and contractors will follow the income eligibility criteria as updated in the CSPM.

4. CAA Funding Allocation Methodology (90% Pass Through)

The funding allocations are based on the following historic formula. The state uses the income data from the 2010 Census to distribute funds under item “b.” Funding Formula

(a) A base allocation of $25,000 for each CAA.

(b) Remaining Funds:
• **84 percent**: Based on each CAA's relative share of the number of persons with income below 125% of the poverty level.

• **10 percent**: Based on each CAA's relative share of the excess number of persons with income below 125% of the poverty level. Excess poverty is defined as the number of persons with income below 125% of the poverty level in excess of the statewide average of 19 percent.

• **6 percent**: Based on each CAA's relative share of the extreme poverty level. Extreme poverty is defined as the number of persons with income 125% of the poverty level in excess of 25 percent.

**Minimum Funding Level**: There is a minimum funding level of $175,000 per agency. Therefore, if an agency’s formula allocation does not meet this level, the state will allocate additional dollars to bring the agency’s funding up to this level. These additional dollars will come from the 5% Discretionary funds.

5. **Funding Agreements and Use of Carry-Over Balances**

Grant Agreements and Grant Awards (Notice of Funds Available/NFAs) are processed after review and approval of the CAA’s Community Action Plan (CAP) and receipt of all required supporting documents. The initial awards are based on the total CSBG funds expected to be allocated to the State for the given fiscal year. The awards are amended in the second quarter of the fiscal year to reflect the final/true allocation amounts (based on the actual State allocation) and the inclusion of allowable prior-year carry forward. Subsequent payments are generated upon receipt of monthly expenditure reports/billing statements.

C. **Distribution and Use of Restricted Funds**

1. **Restricted Funds [675C(a)]**

The State has designated the following program categories/activities that may be supported with CSBG funds: **Employment, Education, Income Management, Housing, Emergency Services, Nutrition, Linkages with Other Programs, Self-Sufficiency, Health and Central Agency Administration** (these categories include programs for youth and seniors).

2. **Recapture and Redistribution of Unobligated Funds [676C(a)(3)]**

As stated in the CSBG Reauthorization, “...A State may recapture and redistribute funds distributed to an eligible entity...that are unobligated at the end of a fiscal year if such unobligated funds exceed 20% of the amount so distributed to such entity for such fiscal year.”
BCAEO policy indicates that each CAA’s annual grant will be closed out as of September 30 each year and unexpended funds exceeding 20% of an agency’s annual allocation will be recaptured and distributed in the following year. The recapture and distribution process/policy is described in CSPM Item 507 – Unexpended Funds - Carry-Forward Policy. (See Exhibit L).

D. **State Use of Retained/Discretionary Funds [675C(b)]**

The State utilizes discretionary funds for three (3) areas: On-Going Statewide Commitments, Discretionary Projects, and Statewide Initiatives.

1. **On-Going Statewide Commitments** include:

   - Funding set aside, approximately $80,000 for the next two fiscal years, FY2015-16, for Native American organizations for program activities to benefit low-income tribal member and/or Native American households:

     The CSBG Act provides certain Native American tribes and tribal organizations the option of applying for funding directly from the federal government or through the State.

     The BCAEO will work with the MDHS Community, Migrant, and Native American Affairs, Michigan Department of Civil Rights, and various tribal groups in the development of plans for the implementation of programs and the distribution of State CSBG discretionary funds for selected recognized tribal groups and organizations. (See Exhibit G - List of Michigan Federally Recognized and Historic Tribes and Map)

   - Funding for Migrant Services to provide emergency and supportive services to Migrant and Seasonal Farmworkers.

   - Funding set aside for Technical and Training Assistance (T/TA) to CAAs will be disbursed two ways for FY2015-16:
     - Through a Request for Proposal process estimated at $150,000. These funds will be awarded to provide services for CAAs to receive training and technical assistance.
     - Funding is also set aside, included under CAA Projects & Other T/TA, to support specific CAA T/TA needs as identified by the BCAEO.

2. **Discretionary Projects and Technical Assistance**:

   The state sets aside a portion of the CSBG discretionary funds for application by CAAs for corrective actions, community and neighborhood-based initiatives, and capacity building projects. This set aside also provides for small **Technical Assistance** contracts to meet local needs specifically identified by the CSBG office. Discretionary fund awards may require a 25% non-CSBG match.
Of major interest are projects where CSBG is used:

- As seed money to bring in other funds.
- For pilot projects, testing projects on an agency basis that have the potential of being replicated by other agencies.

These funds may also be used for:

- Innovative projects that address a community need.
- The development of new, community-based partnerships directly related to one of the “Family” or “Community” ROMA Goals.
- Projects that support a sustainable system of continuous quality improvement in agency management and performance, including client case management systems.
- Capacity building directly related to agency goals, staff development and/or governing board structure, role and legal responsibility.
- Technology needs to strengthen infra-structure and/or reporting needs (such as financial, client tracking and/or reporting software, system hardware and training).

3. **Statewide Initiatives:**

Funding statewide initiatives is one of the ways in which we can serve as an advocate for social and economic opportunities for low income persons across the state. It is the expectation that these funding efforts will ultimately result in increased services and/or increased CAA capacity that will be supported with non-CSBG funds in the future.

- **School Success Program**

The School Success Partnership is a collaboration of community agencies, such as community action agencies, courts, schools, law enforcement and more. The School Success Program utilizes a prevention approach, in that it attempts to identify students in elementary, Junior High, and High Schools who are showing signs of difficulty in school and other settings, such as: Attendance concerns, Behavioral issues, Family Issues (divorce, death, imprisonment, unemployment, economic hardship), Mental Health issues, Substance abuse, Abuse/neglect, Traditional difficulties, Untended needs, Homelessness, or any factor that may have a negative impact on a child’s successful learning experience.

The staff works cooperatively with students, parents, teachers, and other service providers in the community to address issues and concerns. The staff develop an agreed upon case plan which may include: weekly student contacts, biweekly home visits, teacher contacts, and community resource contacts.

- **Affordable Care Act (ACA) Initiative**
In 2013, two CAAs piloted a partnership with the Corporation for National Service to provide Navigators to assist uninsured clients with applying for health care coverage as part of the launch of the Affordable Care Act enrollment period in October 2013. The agency became a Certified Application Counselor (CAC) organization, through which staff received extensive training and certification to certify staff and volunteers as individual CACs to assist consumers with the Marketplace.

- **Michigan Benefit Access Initiative (MBAI):**

  A statewide stakeholder group of 40 nonprofits and state agencies researched innovative strategies for a streamlined benefits delivery system. An easy-to-access, online, benefit application and delivery system coupled with nonprofit outreach was developed.

  Goals:
  - Building a solid public-private partnership
  - Linking work supports and other services to benefits
  - Increasing financial stability for families
  - Improving nonprofit and government efficiency/value

- **Pathways to Potential:**

  The Pathways to Potential is a MDHS initiative that works within the community and within local businesses to spread the word about poverty and how it can be reduced. Three key community partners include schools, employer resource network, and public health partners. The collaborative efforts are integral to the reduction and prevention of poverty.

- **Statewide Community Forums:**

  Per Public Act 230, the Commission for Community Action and Economic Opportunity (Commission) is charged with identifying strategies to reduce poverty and making recommendations to the Governor, legislature, congress and federal offices. PA 230 also requires the Commission to convene public meetings for the purpose of providing low-income and other persons the opportunity to comment upon public policies and programs to reduce poverty in the state of Michigan.

  In **FY14**, the Commission convened four Community Poverty Forums for the purpose of public input concerning public policies and programs to reduce poverty in the state of Michigan. BCAEO set aside funds to support this activity. As result of the statewide Community Poverty Forums across the state, the Commission will submit its report to the Governor. The BCAEO is committed to supporting the statewide forums process every other year.
• **EITC (Earned Income Tax Credit) Program:**

The Governor’s initiative in 2004 (*Michigan Statewide Earned Income Tax Credit Coalition Initiative*), to promote the EITC (earned income tax credit) and other tax credits available to the working poor, has solidified the role and capacity of CAAs across the state to provide free income tax preparation assistance and to promote and assist low-wage earners to file for state and federal credits. Inherent in the process at the local level is the collaboration between CAAs and existing VITA (Volunteer Income Tax Assistance) coalitions, including becoming a VITA partner or becoming a recognized VITA site. Currently, over one-half of our 29 CAAs are either a VITA or TCE site and this number continues to increase.

As we continue to build on the Governor’s initiative, to promote EITC and other tax credits available to the working poor, in **FY2014**, our CAAs participated in providing free income tax preparation activities and in EITC outreach and education activities across the state. Also, with over 86 percent of our CAAs having the capacity to *E-File* (electronically file) tax returns, many CAAs can facilitate quicker refunds. This capability helps decrease the number of our low-income families seeking out paid tax preparers just because they provide E-File services.

The CAA network has moved beyond the initial focus of promoting tax credits and providing no-cost tax preparation assistance. Several CAAs have been expanding their service delivery system and some are including financial asset counseling. In addition, some agencies have garnered additional funds for specific services in their communities.

We are pleased with the efforts and accomplishments of the CAA network and plan to continue financial support in **FY2015** to support these activities and will work with MCAA, the CAAs and others to identify additional resources to support these activities.

• **ROMA Collaborative:**

The ROMA Collaborative is made up of volunteers from the State agency, the CAA network, and MCAA staff. The mission is to strengthen the capacity of the CAA network in the State of Michigan through the Results Oriented Management and Accountability (ROMA) principles to provide a realistic and accurate view of Community Action and those that benefit from the services provided.

**Strategies:**
- ROMA Collaborative expands its leadership in the CAA network to demonstrate and communicate the value and impact of ROMA.
- ROMA Collaborative improves CAA’s capacity to service low-wealth clients by identifying, developing, and/or disseminating
education and resources necessary for CAAs to improve their practices.

- ROMA Collaborative establishes a uniform planning and reporting technology strategy to strengthen processes in order to provide a realistic and accurate view of Community Action using a shared statewide database.

- ROMA Collaborative engages and expands the ROMA professionals that participate and contribute actively in the ongoing development of the CAA network.

E. Use of Administrative Funds [675(b)(2)]

The BCAEO will utilize 5% of the state allocation for the following administrative expenses:

- Salaries and Fringe Benefits for CSBG staff.
- Space and communication costs for CSBG staff.
- Travel costs: For monitoring visits to 29 CAAs and non-CAA discretionary fund recipients; for CSBG staff participation and training at mandatory national conferences including the NASCSP Annual, Orientation, and Monitoring conferences, CAPLAW and other relevant seminars and meetings; for CSBG staff to provide training and technical assistance and to conduct workshops as well as other needs.
- Supplies, meeting materials and expenses, printing and postage costs for CSBG activities.
- Costs associated with a statewide client tracking and reporting system
- Other miscellaneous costs including conference/seminar fees for BCAEO staff and BCAEO membership in national organizations (NASCSP, CAP, and more).
- Activities supporting the work of the BCAEO’s Commission on Community Action and Economic Opportunity, including: travel costs; conference fees; the cost of consultant and professional speakers/presentations; a report on the Poverty Forums.
- MDHS administrative costs allocated to the BCAEO.
F. State Community Services Program Implementation [676(b)(2)]

1. Program Overview

(a) Description of the CAA Service Delivery System:

The 29 CAAs serve the state’s 83 counties through a combination of central, county and satellite offices and home visits as points of access for services. Since their service areas range from 1-11 counties, and their funding base and number of programs vary significantly, each agency has developed a service delivery system unique to its community’s needs and financial resources. However, common to all agencies is: their networking, coordination and collaboration with local public and private emergency service providers in meeting clients emergency needs; their assessment of client non-emergency needs and the effective coordination of CAA and local area services for maximum benefit to the client; and the delivery of services in such a way as to foster self-sufficiency rather than dependency.

A description of the geographical area served and a listing of eligible entities/CAAs (grantees) and services areas is included in Exhibit J - CAA Directory and Service Area Map.

(b) Linkages that have been developed to fill identified gaps in services: [676(b)(3)(B)]

The CAAs actively participate in local networking and planning organizations, including multi-purpose collaborative bodies, human service coordinating bodies, continua of care, workforce development boards, etc. As participants, they take an active role in identifying gaps in services and join together with community leaders and service providers in planning and developing methods of getting services where they are needed.

(c) Coordination with other public and private resources: [676(b)(3)(C)]

Since most of our CAAs use a major portion of their CSBG funds to support the under-funded management costs of their direct service programs, as well as for central operational/administrative costs (vs providing direct monetary services with CSBG), the coordination of public and private resources is one of their most outstanding characteristics. They coordinate the vast majority of their programs with public and private resources and have both verbal and written agreements concerning coordination, referrals, exchange of information, specific services to be provided, funding, volunteers, etc.
Examples of public resources include: hospitals and health care providers; law-enforcement and courts; schools and juvenile offices; local MDHS (welfare) offices; transit and housing development authorities; public utilities; commissions on aging; Work First and One Stop centers; Federal grantors.

Examples of private resources include: volunteers, mentoring and literacy coalitions; child and senior care providers; farm worker and migrant services organizations; energy and transportation providers; churches, food pantries and Gleaners; Foundations; Walk For Warmth, Urban Leagues, United Way, Red Cross, Salvation Army; and banks and lending institutions.

(d) Innovative Community and Neighborhood-based Initiatives

See item V.D.2. - Discretionary Projects.

2. Community Needs Assessments: [676(b)(11)]

The CAA annual CAP instructions require that the agency submit a copy of its latest Community Needs Assessment. The State recommends that CAAs conduct an assessment every 3 years.

Information obtained in FY14 shows the top three community needs in Michigan to be:
1. Access to affordable health insurance,
2. Finding employment with a living wage,
3. Affordable Housing & Utility Assistance (tied)

3. Tripartite Boards: [676B & 676B(b)]

The annual CSBG grant agreements incorporate the requirement that each CAA/eligible entity shall administer the CSBG program through a tripartite board that fully participates in the development, planning, implementation and evaluation of the program to serve low-income communities. Compliance is reviewed during regular monitoring visits.

4. State Charity Tax Program: [675C]

Not applicable

5. Programmatic Assurances [676(b)]

Use of Funds for Stated Purposes: [676(b)(1)]

The state will ensure the use of CSBG funds for the purposes enumerated in Section 676(b) by the use of the following means:
• Publish grantees/contractor plan requirements which include guidelines specifically setting out the purposes of CSBG funds and mandated plan elements. Each CAA will conduct activities under one or more of the following program categories: Employment, Education, Income Management, Housing, Emergency Services, Nutrition, Linkages with Other Programs, Self-sufficiency, Health, and Central Agency Administration (core central staff, facilities, equipment and centralized functions of the agency). Typical programs and services vary from agency to agency.

• Review CAA plans and discretionary contract applications to determine compliance with the purpose of CSBG funds.

• Establish reporting requirements, review submitted reports and monitor grantees/contractors.

Addressing the Needs of Youth: [676(b)(2)]

CAAs work with partners to develop programs to address the needs of youth in the low-income communities throughout Michigan. Some examples are:
• Providing a Women, Infant and Children (WIC) Program.
• Purchasing supplies for Head Start classrooms.
• Summer Food Programs.
• Walking Clubs for Youths and Seniors to develop new friendships and increase self-esteem.
• Foster Grandparent Programs.
• Residential Centers that provide treatment for victims of abuse and neglect.
• Service clubs that provide activities and games for children.
• Youth Recreation and Education.
• Youth Employment Programs.
• School Success Programs.

Coordination with Welfare Reform: [676(b)(3)]

CAAs’ participation in the state’s welfare reform efforts has continued to increase. For the past several years, MDHS (through the legislative budget process) has earmarked a portion of its TANF funds to support CAA activities for TANF eligible households. Receipt of these funds require that the CAA coordinate efforts with their local MDHS and Michigan Works! Agencies in providing case management and supportive services. A number of CAAs are also operating Individual Development Account programs, which assist households in moving further along the road to self-sufficiency.

Also, under the Partnership, Accountability, Training. Hope. (PATH) initiative, formerly call JET (jobs, education & training), – increasing economic opportunity and reducing poverty through jobs, education, and training – CAAs are a resource to partner and/or collaborate with local MDHS offices and Michigan Works!
Agencies to assist clients with supportive services and, where available, to play an active role in training activities. Under PATH, instead of just “find a job – any job,” the emphasis is on a comprehensive approach to connect families with the kinds of jobs, education and training that can help them achieve self-sufficiency through permanent employment. Path places a strong emphasis on helping welfare applicants/recipient stay employed, gain skills, and advance. The goal is to help families find the resources they need to overcome obstacles and move up career ladders to self-sustaining, lasting employment.

Michigan’s CAAs are the largest network of human service providers outside of state government and are playing an active role in welfare reform through their collective and individual efforts including:

- Their common goal of self-sufficiency for low-income households and collaboration of services with local MDHS offices;
- Participation in local collaborative bodies and decision making;
- Providing case management and supportive services (such as extended day care, transportation, skills enhancement, etc.) for Work First and Welfare-to-Work program participants;
- Collaborating with local resources while delivering weatherization and home repair services in efforts to minimize energy costs for clients and maximizing their spendable income; and
- Eleven CAAs are also funded by (or are associated with or part of a larger entity funded by) the Michigan Department of Career Development which administers the state’s Job Training and Opportunities Funds and operates the Welfare-to-Work, Work First and Employment and Training programs.

Emergency Nutrition Services: [676(b)(4)]

The annual CSBG grant agreements incorporate requirements that agencies provide emergency services as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals. In Michigan, CAAs are the largest network of social services outside of state government and the largest emergency food provider network in the state. Most of the CAAs are TEFAP (Temporary Emergency Food Assistance Program) and CSFP (Commodity Supplemental Food Program) service providers and/or provide home-delivered or congregate meals.

Coordination and Linkages between governmental and other social services programs for effective delivery and non-duplication: [676(b)(5)]

Most CAAs are participants in the local Emergency Service Provider Network and/or local Continuum of Care; this participation fosters optimum coordination of services at the local level.

In addition, the following activities promote and require linkages and coordination of services across the state: Michigan CAAs operate nearly 40% of the Head Start programs; these programs require coordination with various child
and family support services and Work First programs. As the largest senior services provider, CAAs work closely with their local Area Offices on Aging. As the largest emergency food provider, CAAs coordinate and network with their area emergency food providers including churches, food coalitions, Gleaners, Red Cross Food Banks, The Salvation Army, The United Way, and more.

Coordination of Employment and Training activities: [676(b)(5)]

In Michigan, federal workforce development programs are administered by the Department of Licensing and Regulatory Affairs and workforce development services are administered locally through 25 Workforce Development Boards. These boards represent the private sector as well as local government agencies, education, social services, labor, community-based organizations and other groups affecting workforce development in a community. Through this private-public partnership, Michigan’s workforce development system -- Michigan Works! -- delivers employment and training programs across the state. The Michigan Works! Agencies (MWAs) oversee a wide variety of programs designed to prepare youth, unskilled adults and dislocated workers for entry into the labor force and to help individuals who are disadvantaged or who face serious barriers to employment obtain the training necessary to get and keep a job.

Seven CAAs in Michigan are part of a larger organization, or are associated with another organization, that is an MWA. These CAAs can provide direct supportive and referral services to their clients who are eligible for the employment and training programs offered by the MWA(s). In addition, several CAAs have entered into agreements with their local MWAs to provide specific services for low-income persons participating in their education and training programs. Many CAAs are involved in the provision of transportation, including direct transportation and car donation, financing and repair programs. Others have developed programs that provide case management, career training or job opportunities. CAAs that use CSBG funds for employment and training activities enter into a Memorandum of Understanding with their local MWA as required by the Workforce Investment Act.

Coordination between anti-poverty programs: [676(b)(6)]

As established in Public Act 230, the BCAEO, within the MDHS, serves as a statewide advocate for social and economic opportunities for low income persons. Within this framework, the BCAEO shall coordinate state activities designed to reduce poverty, administer the Weatherization Assistance Program and to seek additional resources for antipoverty strategies.

The Low-Income Home Energy Assistance Program (LIHEAP) Crisis component (through State Emergency Relief/SER energy services) is administered by local MDHS offices and the maintenance component through the state’s Department of Treasury through the Home Heating Credit/HHC program. Some CAAs assist MDHS with the SER crisis component (by providing SER payments) through contracts with local county offices and others coordinate and refer clients to the
county offices for SER funds. Also, CAAs assist clients with their HHC applications during their yearly tax preparation assistance programs.

In addition to the CSBG Program, the BCAEO also administers the state Weatherization Assistance Program (WAP), funded with DOE and LIHEAP dollars, through the 29 CAAs and one Limited Purpose Agency (LPA). The DOE dollars are directly allocated to the state for WAP services. The CAAs have developed referral relationships with their local MDHS offices for WAP services and work with several local and state resources to collaborate and coordinate for maximum service benefits. As of April 1, 2014, the state’s WAP can assist households with income at or below 200% of the poverty level established by the U.S. Department of Health and Human Services.

Due to the expertise CAA staff have gained through the weatherization program, an increasing number of agencies are moving into state and federally-funded low income housing programs, rehabbing existing housing or partnering with experienced housing developers to produce new housing. An increasing number of CAAs are also becoming involved in housing support services, such as credit counseling, homeownership training, Individual Development Account programs, and more.

**Additional leveraged funds at the state level include:**

- **LIHEAP (Low-income Home Energy Assistance Program):**
  
  As noted above, the amount of LIHEAP funds to be utilized for WAP services is identified by the MDHS LIHEAP program office (not to exceed $9 M for a fiscal year). In FY13, $8 M in LIHEAP funds were available for WAP services for the period April 1, 2013 through June 30, 2014.

  The BCAEO will continue to work with the LIHEAP program office to maximize the level of LIHEAP funding available for weatherization services.

- **LIHEAP Crisis Assistance (LCA) – Utility Assistance:**

  For FY14, the MDHS LIHEAP program office partnered with the BCAEO to provide $7 M for CAAs to provide deliverable fuel assistance throughout the state for the period September 1, 2013 through August 31, 2014. The CAAs accepted these funds with the understanding that there was no allowance for administrative costs. These funds help fill a critical funding gap and enable CAAs to provide emergency fuel assistance to their clients.

  The BCAEO will continue to work within the MDHS as an advocate to identify funds that can be allocated to the CAA network for fuel assistance.

- **Michigan Energy Assistance Program (MEAP) – Energy Assistance**
For FY14, the BCAEO also partnered with the Michigan Public Service Commission (MPSC) to provide energy assistance for low-income clients in an energy crisis. These energy assistance programs are required to include services that will enable participants to move toward becoming self-sufficient.

Coordination of programs and forming partnerships: [676(b)(9)]

The annual CSBG grant agreements incorporate requirements to, at the maximum extent possible, coordinate programs and form partnerships with other organizations serving low-income residents. The CAAs have historically developed partnerships with a multitude of public and private service providers and describe those relationships in their annual CAP.

Some Examples:
- CAAs partner with local organizations in a statewide effort to combat the causes of poverty through the work of the Voices for Action (V4A) Regional Network. The V4A network was formed as a result of the Voices for Action Poverty Summit in 2008. V4A is comprised of organizations and individuals in eight regions. Partners include state agencies, foundations, and universities. A complete list is available on the Voices for Action website.
- CAAs partner with their local Continuum of Care provider(s) and Multi-Purpose Collaborative Bodies to coordinate services.
- CAAs partner with local faith-based organizations, United Way and Salvation Army, for example, to identify and pool resources and/or to coordinate referrals.
- CAAs have formed partnerships with other service providers, financial institutions and foundations while administering IDA programs.
- Seventeen CAAs have worked with the Michigan State Housing Development Authority (MSHDA) to be identified as Certified Homeownership Counselors for MSHDA programs.
- CAAs are becoming active partners, or lead agency, in local VITA Coalitions.
- CAAs are active with groups that serve seasonal workers such as the regional Migrant Resource Council.
- Many CAAs collaborate with their local school systems to offer Head Start, Early Head Start and the Foster Grandparent Program.
- CAAs are linking up with the “Michigan 2-1-1” system to identify their agency-wide programs and services. This statewide system coordinates the link/connection between individuals and families in need with the appropriate community-based organizations and governmental agencies. 2-1-1 is the single point of entry to get information on critical services available and how to connect with providers.
G. Fiscal Control and Monitoring

1. State Program Monitoring [678B(a)]

In addition to the review/monitoring noted below, all grants, agreements, contracts and the CSPM require grantees to submit monthly expenditure reports within 30 days following the end of the month. All pass-through awards are closed out and reconciled after September 30 each year in order to determine final agency expenditures and allowable carry-forward. Grantees are also required to submit programmatic reports on either a quarterly, semi-annual or annual basis depending on the type of award.

(a) On-site review of each eligible entity at least once during each 3-year period: The monitoring process is a continuing activity throughout the fiscal year and the BCAEO updates the monitoring tools annually. The monitoring process includes two levels of review, an Annual level review and a Comprehensive level review. Each CAA receives an annual monitoring visit; however, every other year a comprehensive review is conducted.

Annual Level: Annual Monitoring incorporates review of client eligibility determination, allowable costs for each of our contract programs [4-8 programs], federal and state policies, and follow up of any prior year findings.

Comprehensive Level: Comprehensive Monitoring provides for a more comprehensive review aimed at assessing the overall health of the agency. This review incorporates areas found in the “Standard Monitoring Principles and Practices” that was developed by NASCSP. Therefore, it also covers agency procedures, procurement, personnel policies, board requirements and functions, staff interviews, coordination with other local organizations, and more and lasts from 3-5 days.

Monitoring reports are issued following each visit and include administrative recommendations and findings, with follow-up responses required. T/TA is provided, or provided for, as necessary.

Monitoring tools and processes continue to evolve from year-to-year based on our experiences, federal and state requirements and staff training opportunities. For example: We have developed statement of expenditure monitoring reviews starting in 2012. We have also adopted desk review monitoring.

(b) On-site review of each newly designated entity after one year of funding: An onsite review of a newly designated entity would be included in the regular annual monitoring process or sooner if circumstances warranted.
(c) **Follow-up reviews for entities that fail to meet the requirements established by the State:** As noted above, all CAAs are monitored on an annual basis. Additional visits are made as deemed necessary when concerns surface regarding financial and/or management issues. Also, the monitoring process includes review of issues from the prior year’s monitoring report that were unresolved or identified for follow-up.

(d) **Other reviews as appropriate:** Additional on-site reviews are conducted when specific concerns are identified that require attention, review, discussion or T/TA. In addition to the annual monitoring process, staff from the MDHS Office of Monitoring and Internal Controls division perform periodic financial management reviews in coordination with, or at the request of, the BCAEO or MDHS.

(e) **Audit reviews:** All CAA grant and contract agreements require agencies to follow the audit report requirements in the Single Audit Act (OMB A-133 or A-128) and to follow the appropriate OMB financial and administrative circulars pertinent to their organization structure. (See Exhibit H - CAA Audit Information, which identifies when the last audit was received by MDHS and the period covered by the audit.)

CAAs are required to submit copies of their A-133 audits to MDHS Office of Monitoring and Internal Controls whom reviews and issues findings and administrative recommendations as necessary. The BCAEO (program office) requests and reviews relevant corrective action plans from the CAAs, prepares necessary MDHS Management Decision Letters and performs necessary follow-up.

(f) **Organizational Standard reviews:** The new organizational standards were piloted by a few CAAs in 2013. They will be tested in 2014 and monitored in 2015. There will be continuous technical and training opportunities on these new standards throughout 2014 and 2015. In 2016, technical and training opportunities will be provided on organizational standard areas that are met by fewer than 30 percent of the CAAs.

2. **Corrective Action, Termination and Reduction of Funding**

[676(b)(8); 676(e); 678C]

If the State determines, on the basis of a final decision in a review pursuant to section 678B, that an eligible entity has failed to comply with the terms of an agreement, or the State plan, to provide services under the CSBG Act or to meet appropriate standards, goals and other requirements established by the State, the State will follow the procedures found in Section 678C(a)(1),(2),(3) and (4) to allow the entity to correct the deficiency prior to initiating hearing procedures for termination or reduction of funding. The steps and procedures are outlined in MDHS’s CSPM Item 501 - Corrective Action - Termination or Reduction in Funding. (See Exhibit I)
3. Fiscal Controls, Audit and Withholdings

**Fiscal Controls** [678D(a)(1)]: Fiscal control and fund accounting procedures have been established which assure the proper disbursal of, and accounting for, federal funds paid to the state under this subtitle—including procedures for monitoring the assistance provided under this subtitle. Monthly expenditure reports are required of all CSBG grantees/contractors. All grantees/contractors are required to submit audit reports according to the requirements of the Single Audit Act (OMB A-133 or A-128) and to follow the appropriate OMB financial and administrative circulars pertinent to their organizational structure. (See Exhibit H - CAA Audit Information)

**Audit** [678(a)(2)]: The BCAEO is subject to periodic fiscal and program audits by the state Auditor General (AG) in accordance with the Single Agency Audit Act. The most recent audit issued by the AG was for the two-year period ending September 30, 2012.

4. Assurances

(a) **Cooperation with Federal Investigations** [676(b)(7) and 678D]:

Cooperation will be provided for all federal investigations undertaken in accordance with Section 678D. This requirement is also incorporated either specifically or by reference in all grantee agreements.

(b) **Termination or Reduction in Proportional Funding** [676(b)(8)]:

No eligible entity funded in the previous fiscal year shall have its existing or future CSBG funding terminated or reduced without notification of the cause(s) and the opportunity for a due process hearing [in accordance with Section 678C(b)]. The procedures for notification and due process hearings are described in MDHS’s CSPM Item 501 - Corrective Action - Termination or Reduction in Funding. (See Exhibit I)

(c) **Adequate Representation on the Board** [676(b)(10)]

The CSBG grant agreements incorporate the requirement that the agency establish procedures for a low-income individual, community organization, or religious organization, (or its respective representatives), to petition for adequate representation if it feels it is inadequately represented on the Board.

H. Accountability and Reporting Requirements

1. **Results Oriented Management and Accountability (ROMA):**
The state will review performance toward meeting the six (6) CSBG National Goals utilizing the National Performance Indicators (developed within the Community Services Network) as well as performance targets identified at the state level. (See Exhibit Q - ROMA- National Performance Indicators)

Each CAA will report on the National Indicators that are applicable to their agency’s programs. ROMA planning (identifying performance targets) will be included as part of the CAA Community Action Plan by using Logic Models. Agencies will use a statewide database for measuring and reporting outcomes.

2. **Annual Report: [678E(a)(2)]**

For FY2013, the annual report was included in the state’s FY2013 CSBG-IS (CSBG Information System Survey) submitted to the National Association for State Community Service Programs (NASCSP) (See Exhibit K for CSBG-IS Database Reports). The report for \textbf{FY2014} will be included in the CSBG-IS report due to NASCSP by March 31, 2015. This will include:

(a) Performance Objectives
(b) Program Accomplishments and Activities
(c) Comparison of Planned and Actual Expenditures for Prior Fiscal Year
(d) Profile of Participants Served
(e) Statistical Report on CSBG Program Services/Categories
(f) Training and Technical Assistance Provided by the State

In addition to the specific T/TA activities to be included in the report, please note that: Training and technical assistance is an on-going collaborative effort between the BCAEO, MCAAA and the agencies/CAAs. This occurs at three (3) levels.

- **Structured training at the MCAAA Conferences:**

  Each conference includes a number of training opportunities, with training tracks designed to address the needs of the agencies and/or as identified by the BCAEO or MCAAA. Training is designed to address CAA Executive Directors, Board Chairs and Members and CAA staff. The training curriculum is designed by a committee that includes representatives from MCAAA, the BCAEO and the CAAs. The conferences provide for: Discussion, education and/or training on various subjects, such as Pathways to Excellence, action steps to address poverty in Michigan, Board Development, Organizational Standards, ROMA, Human Resources, Finance, and more; program specific updates and training (for example: Weatherization and EITC); and skills and education enhancement in various areas such as grant writing, health and nutrition, leadership development, strategic planning, ROMA planning and reporting, marketing, housing programs, audit requirements, and other areas too numerous to mention. Trainers include a combination of
contracted specialists, MCAAA and BCAEO staff and experts from within the CAA network.

- **Emergency or Specific T/TA, coordinated by MCAAA:** This training is provided to address specific situations, in response to an identified need or emergency situation. As each situation is unique, resources may include: peer-to-peer, outside contractors, community members, BCAEO staff, or other references as needed.

- **On-going T/TA provided by the BCAEO’s fiscal analyst, monitors and grant managers:** On-going T/TA is provided both during the monitoring visits and as needed on a day-to-day basis by phone or in person. Significant problems that are identified as a result of the state-wide monitoring reviews are subsequently addressed through a structured training program or technical assistance activities.
VI. APPENDICES

Exhibit A  Designation of Lead Agency/Contact List

  • As amended through 2003
  • As amended in 2006 – House Bill No. 5258

Exhibit C  Notice of Public Hearing/Public Comment Period

Exhibit D  Commission on Economic Opportunity and Community Action
  • Commission Roster

Exhibit E  Organization Charts:
  • Michigan Department of Human Services
  • Bureau of Community Action & Economic Opportunity

Exhibit F  Projected - CAA Funding Schedule

Exhibit G  Michigan Federally Recognized & Historic Tribes and Map

Exhibit H  CAA Audit Information

Exhibit I  Corrective Action - Termination or Reduction in Funding
  • CSPM Item 501

Exhibit J  CAA Directory and Service Area Map

Exhibit K  CSBG-IS Database Reports

Exhibit L  Unexpended Funds – Carry-Forward Policy
  • CSPM Item 507

Exhibit M  Environmental Tobacco Smoke Certification

Exhibit N  Lobbying--Contracts, Grants, Loans... Certification

Exhibit O  Debarment, Suspension....Certification

Exhibit P  Drug-Free Workplace…Certification

Exhibit Q  ROMA – National Performance Indicators
Designation of Lead Agency
May 14, 2013

Jeannie Chaffin, Director
Office of Community Services Administration for Children and Family
U.S. Department of Health and Human Services
370 L'Enfant Promenade, S.W.
Washington, D.C. 20447

Dear Ms. Chaffin:

The Michigan Department of Human Services (DHS) is designated as the lead agency for the Community Food and Nutrition (CFN) Program, Community Services Block Grant (CSBG), and Low Income Home Energy Assistance Program (LIHEAP). Maura D. Corrigan, Director, Michigan Department of Human Services, is authorized to certify any required federal assistance or other documents associated with the CFN Program, CSBG, and LIHEAP.

All Michigan grant award letters for the above programs should be sent to:

Director Maura D. Corrigan
Department of Human Services
235 S. Grand Avenue, Suite 1514
P.O. Box 30037
Lansing, MI 48909

Thank you for your consideration.

Sincerely,

Rick Snyder
Governor

cc: Maura D. Corrigan
CSBG Points of Contact:

1. Director Maura D. Corrigan  
   MDHS - Grant Management Section  
   235 S. Grand Avenue  
   Lansing, MI  48933  
   Ph: 517-241-2453  
   Fax: 517-373-4865  
   DHS-Grants@michigan.gov

2. Kris Schoenow, Director  
   MDHS – Bureau of Community Action and Economic Opportunity  
   235 South Grand Avenue, Suite 204  
   Lansing, MI  48909  
   Ph: 517-373-8896  
   Fax: 517-335-5042  
   Schoenowk@michigan.gov  
   DHS-BCAEO@michigan.gov
P.A. 230 of 1981

As Amended through 2003

AND

As Amended in 2006 – House Bill No. 5258
MICHIGAN ECONOMIC AND SOCIAL OPPORTUNITY ACT OF 1981
Act 230 of 1981

AN ACT to create a bureau of community services and a commission on economic and social opportunity within a state department to reduce the causes, conditions, and effects of poverty and promote social and economic opportunities that foster self-sufficiency for low income persons; to provide for the designation of community action agencies; and to prescribe the powers and duties of the department, the bureau, the commission, and the community action agencies.


The People of the State of Michigan enact:

400.1101 Short title.
Sec. 1. This act shall be known and may be cited as the “Michigan economic and social opportunity act of 1981”.


Compiler’s note: For transfer of authority, powers, duties, functions, and responsibilities established under the Michigan economic and social opportunity act and transferred by Executive Order 1993-4 from the department of labor to the Michigan jobs commission and continued by Executive Order 1994-26 within the Michigan jobs commission to the department of social services, see E.R.O. No. 1995-1, compiled at § 408.49 of the Michigan Compiled Laws.

400.1102 Meanings of words and phrases.
Sec. 2. For purposes of this act, the words and phrases defined in sections 3 and 4 have the meanings ascribed to them in those sections.


400.1103 Definitions; B to D.
Sec. 3. (1) “Bureau” means the bureau of community action and economic opportunity created in section 5.
(2) “Chief elected official” means a chairperson of a county board of commissioners, a county executive, a city mayor, a township supervisor, a village president, or his or her designee.
(3) “Commission” means the commission on community action and economic opportunity created in section 6.
(4) “Community action agency” means an agency designated pursuant to section 8.
(5) “Community social and economic programs” means those programs provided under section 675 of the community services block grant act, subtitle B or title VI of the omnibus budget reconciliation act of 1981, Public Law 97-35, 42 U.S.C. 9904.
(6) “Department” means the family independence agency or another department or agency designated by the governor to receive and distribute community services block grant funds under the community services block grant act, subtitle B of title VI of the omnibus budget reconciliation act of 1981, Public Law 97-35, 42 U.S.C. 9901 to 9924.
(7) “Director” means the director of the department.


400.1104 Definitions; E to S.
Sec. 4. (1) “Executive director” means the chief administrator of the bureau.
(2) “Low income person” means a person who is a member of a household that has a gross annual income that is equal to or less than the poverty standard for the same size household.
(3) “Poverty standard” means the federal poverty guidelines published annually in the federal register by the United States department of health and human services under its authority to revise the poverty line under section 673(2) of subtitle B of title VI of the omnibus budget reconciliation act of 1981, Public Law 97-35, 42 U.S.C. 9902.
(4) “Service area” means the geographical area served by a community action agency.
(5) “State program budget” means state funds, federal block grants, and federal categorical grants that the legislature appropriates annually for community social and economic programs.


400.1105 Bureau of community action; creation; appointment of executive director; powers and duties of bureau.
Sec. 5. The bureau of community action and economic opportunity is created within the department. The
director shall appoint an executive director who is a member of the state classified service or the state career
executive service, as established and approved by the civil service commission. Under the supervision of the
department, the bureau shall serve as a statewide advocate for social and economic opportunities for low
income persons and shall do all of the following:
(a) Coordinate state activities designed to reduce poverty and implement community social and economic
programs.
(b) Cooperate with agencies of the state and federal government and other public agencies, nonprofit
private agencies, and nonprofit organizations in reducing poverty and implementing community social and
economic programs.
(c) Receive and expend funds for any purpose authorized by this act.
(d) Provide assistance to units of local government for the purpose of establishing and operating a
community action agency.
(e) Designate community action agencies pursuant to section 8.
(f) Provide technical assistance to community action agencies to improve program planning, program
development, administration, and the mobilization of public and private resources. In implementing this
subdivision, the department shall contract, when warranted by geographical and other factors or when
warranted to meet the requirements of section 15, with public agencies, nonprofit private agencies, or
nonprofit organizations.
(g) Enter into necessary contracts with community action agencies for the purpose of coordinating
community social and economic programs and other programs and services designated by the bureau and for
which funding is appropriated by the legislature.
(h) Contract with public agencies, nonprofit private agencies, or nonprofit organizations for demonstration
programs and other services necessary to implement this act.
(i) Conduct performance assessments of the activities and programs of community action agencies.
(j) Establish, in cooperation with community action agencies, an educational and public information
program designed to increase public awareness regarding the nature and extent of poverty in this state and
regarding existing community social and economic programs.
(k) Evaluate state statutes and programs relevant to the reduction of poverty and recommend appropriate
changes to the governor and the legislature.
(l) Submit reports to the governor, the legislature, the state congressional delegation, and other appropriate
federal officials regarding the needs, problems, opportunities, and contributions of low income persons; the
effectiveness of existing state or federal policies and programs; and recommended actions to improve
economic and social opportunities for low income persons.
(m) Administer the weatherization assistance program created pursuant to 10 C.F.R. part 440. The bureau
shall administer the weatherization assistance program in a manner that provides that public agencies,
nonprofit private agencies, and nonprofit organizations are eligible and shall have the opportunity for funding
for each portion of a program that a community action agency may undertake.
(n) Serve as an advocate within the executive branch to remove administrative barriers to self-sufficiency
services and to seek additional resources for antipoverty strategies.

400.1106 Commission on community action and economic opportunity; creation;
appointment, qualifications, and terms of members; chairperson; executive secretary;
vacancies; per diem compensation; reimbursement of expenses; quorum; commission
action; meetings.

Sec. 6. (1) A commission on community action and economic opportunity is created within the department.
The commission shall provide an opportunity for low income persons to actively participate in the
development of policies and programs to reduce poverty.
(2) The commission shall consist of 6 to 15 members appointed by the governor by and with the advice
and consent of the senate. The commission shall be comprised of equal numbers of elected public officials,
private sector members, and low income individuals or as nearly equal in number as possible. At least 1/3 of
the commission members shall be community action agency representatives as either staff or board members.
The governor shall designate the chairperson of the commission. The chairperson shall serve at the will of the
governor. The executive director or designee of the commission shall serve as executive secretary to the
commission.
The term of office of each member shall be 3 years. Vacancies on the commission shall be filled in the same manner as the original appointment for the remainder of the unexpired term.

A member of the commission may receive per diem compensation and reimbursement of actual and necessary expenses while acting as an official representative of the commission. The per diem compensation of the commission and the schedule for reimbursement of expenses shall be established annually by the legislature.

A majority of the commission constitutes a quorum. Except as otherwise provided by rule, action may be taken by the commission by vote of a majority of the members present at a meeting. The commission shall meet not less than 4 times a year. A meeting of the commission may be held anywhere within this state.


### 400.1107 Duties of commission.

Sec. 7. The commission shall serve as a statewide forum concerning state policies and programs to reduce poverty and to address the needs and concerns of low income people in this state. The commission shall do all of the following:

(a) Convene a state forum every 2 years that includes representatives from the public, private, nonprofit, and low income sectors to analyze poverty trends and make recommendations to reduce poverty.

(b) Convene public meetings to provide low income and other persons the opportunity to comment upon public policies and programs to reduce poverty.

(c) Advise the executive director concerning the designation or rescission of a designation of a community action agency.

(d) Review and comment upon the annual program budget request before its submittal to the governor and the legislature pursuant to section 10.

(e) Advise the governor, the legislature, the state congressional delegation, and other appropriate federal officials of the nature and extent of poverty in the state and make recommendations concerning needed changes in state and federal policies and programs.

(f) Advise the director and the governor at least annually concerning the performance of the bureau in fulfilling its requirements as prescribed by this act.

(g) Participate with the bureau to implement a public education program designated to increase public awareness regarding the nature and extent of poverty in this state.

(h) Receive reports from the bureau on strategies to reduce poverty and make recommendations based on those reports to the governor.

(i) In coordination with community action agencies and the commission, establish an education and public information program designed to increase public awareness regarding the nature and extent of poverty in this state and regarding existing community social and economic programs.

(j) Evaluate state statutes and programs relevant to the reduction of poverty and recommend appropriate changes to the governor and the legislature.

(k) Submit reports to the governor, the legislature, the congressional delegation, and other appropriate federal officials regarding the needs, problems, opportunities, and contributions of low income persons and the effectiveness of existing state and federal policies and programs, and recommend actions to improve economic and social opportunities for low income persons.


### 400.1108 Designating or rescinding designation of community action agency; procedures; continuation of community action agency designated by community services administration; rescission of designation.

Sec. 8. (1) Except as required to meet the requirements of section 15, the executive director shall designate community action agencies to fulfill the requirements of this act in the service areas governed by 1 or more units of local government. A community action agency designated by the executive director may be 1 of the following:

(a) A public office or agency of a unit of local government that is designated as a community action agency by the chief elected official of that unit of government.

(b) A public office or agency that is designated as a community action agency by the chief elected officials of a combination of 2 or more units of local government.

(c) A nonprofit private agency serving 1 or more units of local government approved by the chief elected official of the unit of local government that includes the service area, or if more than 1 unit of local government is included in the service area, by the chief elected officials of the county or counties in which the
Local governments are located and of at least 2/3 of the cities, villages, and townships in the service area that have a population of not less than 100,000.
(d) A public or private nonprofit agency designated by 1 or more native American tribal governments that have been established pursuant to state or federal law.

(2) Before designating or rescinding the designation of a community action agency, the executive director shall do all of the following:
(a) Consult with the director.
(b) Consult with the chief elected official of each county and of each city, village, or township with a population of not less than 100,000 within the existing or proposed service area.
(c) Hold at least 1 public meeting in the service area to provide low income and other citizens living within the service area the opportunity to review and comment upon the strengths and weaknesses of the existing or proposed community action agency.
(d) Consult with and obtain the advice of the commission on the proposed action.

(3) Notwithstanding subsections (1) and (2), each community action agency that has been designated by the community services administration pursuant to the economic opportunity act of 1964, Public Law 88-452, 78 Stat. 508, and that is in operation on the effective date of the 2003 amendatory act that amended this section shall continue as a community action agency.

(4) The executive director may rescind the designation of a community action agency for cause. In implementing this subsection, the executive director shall follow the procedures set forth in subsection (2) and the procedures set forth in the community services block grant act, subtitle B of the omnibus budget reconciliation act of 1981, Public Law 97-35, 42 U.S.C. 9901 to 9924.


400.1109 Community action agency; duties; permissible activities.
Sec. 9. A community action agency shall serve as a primary advocate for the reduction of the causes, conditions, and effects of poverty and shall provide social and economic opportunities that foster self-sufficiency for low income persons. A community action agency may engage in activities necessary to fulfill the intent of this act, including, but not limited to, the following:
(a) Informing this state, units of local government, private agencies and organizations, and citizens of the nature and extent of poverty within the service area.
(b) Developing, administering, and operating community social and economic programs to reduce poverty within the service area.
(c) Providing a range of services and activities having a measurable and potentially major impact on causes of poverty in the community or in the service areas of the community.
(d) Providing activities designed to assist low income participants, including the elderly poor, to secure and retain meaningful employment; to attain an adequate education; to make better use of available income; to obtain and maintain adequate housing and a suitable living environment; to obtain emergency assistance through loans or grants to meet immediate and urgent individual and family needs, including the need for health services, nutritious food, housing, and employment-related assistance; to remove obstacles and solve problems which block the achievement of self-sufficiency; to achieve greater participation in the affairs of the community; and to make more effective use of other programs related to the purposes of this section.
(e) Providing on an emergency basis for the provision of supplies and services, nutritous food items, and related services necessary to counteract conditions of starvation and malnutrition among the poor.
(f) Providing and establishing linkages between governmental and other social services programs to assure the effective delivery of services to low income individuals.
(g) To encourage the use of entities in the private sector of the community in efforts to reduce poverty.
(h) Conducting pilot and demonstration projects with innovative approaches to reduce poverty, improve services, and utilize resources.
(i) Providing and advocating for training and technical assistance to public and private agencies, community groups, and units of local government to better define human problems, to improve services, and to facilitate citizen participation, including that of low income persons.
(j) Increasing interagency coordination and cooperation in serving low income persons. If possible, community action agencies shall enter into partnership and collaboration with other organizations to meet economic self-sufficiency goals.
(k) Entering into contracts with federal, state, and local public and private agencies and organizations as necessary to carry out the purposes of this act.
(l) Mobilizing federal, state, and local public and private financial resources and material and volunteer resources to reduce poverty and increase social and economic opportunities.
(m) Mobilizing community involvement from private and nonprofit sectors, including, but not limited to, businesses, economic and job development organizations, nonprofit faith-based communities, technical colleges and institutions of higher education, and the public sector, including, but not limited to, townships, cities, counties, and this state to address issues of poverty. Community action agencies shall coordinate with welfare-to-work strategies and implement strategies that increase household income and assets that lead to long-term economic self-sufficiency.

(n) Serving populations with barriers to self-sufficiency such as individuals and families with low incomes, senior citizens, young children, homeless persons, physically and developmentally disabled persons, low wage workers, and adults without literacy skills or basic education or adequate skills needed for the workplace.

(o) Engaging in any other activity necessary to fulfill the intent of this act.

400.1110 Distribution of funds.
Sec. 10. Distribution of funds to community action agencies shall meet federal requirements.

400.1111 Community action agency; establishment of governing board of directors; qualifications and selection of members.
Sec. 11. A community action agency shall establish a governing board of directors that consists of the following:
(a) One-third are elected public officials. An elected public official may act through his or her representative.
(b) One-third of the members are low income, elderly, or consumers with disabilities.
(c) One-third of the members represent the private sector, including representatives of business and industry, agriculture, labor, and religious and civic organizations.

Compiler's note: The repealed section pertained to establishment of board of directors for community action agency.

400.1113 Interagency agreements; purpose; renewal.
Sec. 13. The bureau shall develop interagency agreements with agencies of other departments providing services to low income persons. The agreements shall specify methods of interagency planning and coordination of services. The agreements shall be renewed annually.

400.1114 Conducting business at public meeting; notice; availability of writings to public.
Sec. 14. (1) The business which the commission, a community action agency board of directors, or a community action agency advisory board may perform shall be conducted at a public meeting held in compliance with Act No. 267 of the Public Acts of 1976, as amended, being sections 15.261 to 15.275 of the Michigan Compiled Laws. Public notice of the time, date, and place of the meeting shall be given in the manner required by Act No. 267 of the Public Acts of 1976, as amended.
(2) A writing prepared, owned, used, in the possession of, or retained by the commission, the bureau, the department, or a community action agency created pursuant to this act in the performance of an official function shall be made available to the public in compliance with Act No. 442 of the Public Acts of 1976, as amended, being sections 15.231 to 15.246 of the Michigan Compiled Laws.

400.1115 Existing agencies and organizations performing services described in act; eligibility to receive funds; continuation of services.
Sec. 15. A public agency, nonprofit private agency, or nonprofit organization in existence and performing 1 or more of the services described in this act for which federal or state funds were expended, if eligible to
receive the funds, shall receive those funds to enable the public agency, nonprofit private agency, or nonprofit 
organization to continue to perform those services.  

400.1116 Rules.  
Sec. 16. The department shall promulgate rules to implement this act pursuant to the administrative 
of the Michigan Compiled Laws. The department shall consult with and receive the advice of the commission 
before promulgating a rule under this act.  

400.1117 Effectiveness report.  
Sec. 17. Before January 1, 1986, the department shall submit to the senate and house committees that have 
the responsibility for labor matters a report covering the effectiveness of the bureau, the commission, and the 
community action agencies in reducing poverty and promoting social and economic opportunities for low 
income persons under this act.  

400.1118 Appropriation of funds from general fund not required; condition.  
Sec. 18. The legislature shall not be required to appropriate funds from the general fund for the continued 
performance of the provisions of this act, if federal funding for coordinating community social and economic 
programs and other programs and services as designated by the bureau and funded by the community 
development block grant is eliminated.  

400.1119 Proposed use and distribution of funds provided under omnibus budget 
reconciliation act of 1981; public hearings; approval or disapproval of bureau plan.  
Sec. 19. The legislature shall conduct public hearings on the proposed use and distribution of funds to be 
provided pursuant to section 675 of the omnibus budget reconciliation act of 1981, 42 U.S.C. 9902, and shall 
approve or disapprove by concurrent resolution adopted by a majority of the members elected and serving in 
each house the bureau's plan for distribution of funds.  

Compiler's note: The repealed section pertained to effective date of act.
EXHIBIT C

Notice of Public Hearing
Michigan Department of Human Services

Announces the Availability

of the Fiscal Years 2015-2016

Community Services Block Grant (CSBG) State Plan

The CSBG State Plan will be available for public review and comment at a public hearing to be held July 9, 2014 from 1:00 pm until 2:00 pm in the Grand Tower, 235 S. Grand Ave., Dempsey Room, Lansing, Michigan.

CSBG Public Hearing

July 9, 2014

1:00 p.m. – 2:00 p.m.
Grand Tower
235 S. Grand Ave, Room Dempsey Room
Lansing, Michigan

Written comments will accepted through July 18, 2014 to:

September Ward, CSBG Specialist
Bureau of Community Action and Economic Opportunity
Michigan Department of Human Services
Suite 204
PO Box 30037
Lansing, MI  48909

DHS-BCAEO@Michigan.gov

Fax: (517)335-5042
NOTICE OF PUBLIC HEARING

Michigan Department of Human Services (DHS) announces the availability of the Fiscal Year 2015 Community Services Block Grant (CSBG) State Plan, Low Income Home Energy Assistance Program (LIHEAP) State Plan, and the Title XX Social Services Block Grant (SSBG) State Plan.

Public hearing for the CSBG State Plan will be held July 9, 2014 from 1p.m.-2 p.m. at the Grand Tower, 235 S. Grand Ave., Dempsey Room, Lansing, Michigan. The CSBG State Plan will be available for public comment beginning July 1, 2014, on the DHS website at www.michigan.gov/dhs. It will also be available for review at Community Action Agency offices throughout Michigan. Comments on the CSBG State Plan will be accepted through July 18, 2014 and should be sent to Kris Schoenow, Director, Bureau of Community Action and Economic Opportunity, Department of Human Services, Suite 204, PO Box 30037, Lansing, MI 48909, by email at DHS-BCAEQ@michigan.gov, or by fax to 517-335-5042.

The SSBG State Plan is available for public review on the DHS website during July 2014. Comments on the SSBG State Plan may be posted to the electronic mailbox (DHS-SSBGMail@michigan.gov) designated for this purpose.

In accordance with federal requirements, the LIHEAP State Plan report is available for review and comment at local DHS offices throughout the state. Comments on the LIHEAP State Plan will be received from July 16-31, 2014. Public hearings for LIHEAP will be held July 24, 2014 from 10 a.m.-Noon at Cadillac Place, Conference Room L-150, 3040 W. Grand Blvd., Detroit Michigan and on July 23, 2014 from 10 a.m.-Noon at the Grand Tower, 235 S. Grand Ave., Dempsey Room, Lansing, Michigan. Written comments may be submitted to: Maura Corrigan, Director, Michigan Department of Human Services. P.O. Box 30037, Lansing, MI 48909.
Commission on Community Action & Economic Opportunity

Member Roster
The Commission on Community Action and Economic Opportunity

Anne Armstrong Cusack, Chairperson

<table>
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<tr>
<th>Member</th>
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<th>Represents Public Sector</th>
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<tr>
<td>Anne Armstrong Cusack</td>
<td>June 21, 2014</td>
<td>Grand Rapids</td>
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<tr>
<td>Honorable Gregg P. Iddings</td>
<td>June 21, 2014</td>
<td>Britton</td>
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<tr>
<td>Honorable Kimberly F. Small</td>
<td>June 21, 2014</td>
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<tr>
<td>Frances C. Amos</td>
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<td>Dennis M. Echelbarger</td>
<td>June 21, 2014</td>
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<td>Sheu-Jane Gallagher</td>
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<td>Jill Edwards-Sutton</td>
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<td>Executive Director, Mid-Michigan Community Action Agency</td>
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<td>Jessica M. Taylor</td>
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<td>Executive Director, Chance for Life Organization, Detroit</td>
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<td>Kimberly J. Ruiz</td>
<td>June 21, 2014</td>
<td>Bridges Out of Poverty Coordinator for the Monroe County</td>
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<td>Douglas J. Williams</td>
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As of July 1, 2014, the Governor has not renewed the terms of the Commission. DHS expects this will be done in the near future. The Governor is looking at a new process for choosing the Commission members.

<The Commission on CA&EO provides an opportunity for low-income persons to actively participate in the policies and programs to reduce poverty.
<At least 1/3 of Commission members shall be CAA representatives as either staff or Board members.
<Appointments are subject to Article V. Sec. 6 of the Michigan State Constitution of 1963.
<Pending board appointments.
Organization Charts

Michigan Department of Human Services
and
Bureau of Community Action & Economic Opportunity
Projected - CAA Funding Schedule

CAA 90% Funds Pass Through
### Community Action Agencies

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<td><strong>$21,963,517</strong></td>
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*Public Agencies

**Note 1:** There is a minimum CAA funding level of $175,000. If an agency's formula allocation does not meet this level, the state will allocate additional dollars (from CSBG-Discretionary Funds) to bring the funding up to $175,000.
Michigan Federally Recognized & Historic Tribes

and

MAP
### FEDERALLY RECOGNIZED TRIBES

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<tr>
<th>Name</th>
<th>Address</th>
<th>Phone</th>
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<tr>
<td>Bay Mills Chippewa Indian Community</td>
<td>12140 W. Lakeshore Drive</td>
<td>(906) 248-3241</td>
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<td></td>
<td>Brimley, MI 48715</td>
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<tr>
<td>Keweenaw Bay Indian Community</td>
<td>107 Beartown</td>
<td>(906) 353-6623</td>
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<td></td>
<td>Baraga, MI 49908</td>
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<tr>
<td>Saginaw Chippewa Indian Tribe</td>
<td>7070 E. Broadway</td>
<td>(517) 775-4000</td>
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<td>Mt. Pleasant, MI 48848</td>
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<tr>
<td>Little Traverse Bay Band of Odawa Indians</td>
<td>915 Emmet Street</td>
<td>(231) 348-3410</td>
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<td>Petoskey, MI 49770</td>
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<tr>
<td>Sault Ste. Marie Tribe of Chippewa Indians</td>
<td>523 Ashmun Street</td>
<td>(906) 635-6050</td>
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<td>Sault Ste. Marie, MI 49783</td>
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<tr>
<td>Hannahville Potawatomi Indian Community</td>
<td>N-14911 Hannahville, B-1 Road</td>
<td>(906) 466-2932</td>
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<td>Wilson, MI 49896</td>
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<tr>
<td>Grand Traverse Band of Ottawa &amp; Chippewa Indians</td>
<td>2605 N.W. Bayshore Drive</td>
<td>(231) 271-3538</td>
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<td>Suttons Bay, MI 49682</td>
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<td>Lac Vieux Desert Band of Lake Superior Chippewa Indians</td>
<td>PO Box 249, Choate Road</td>
<td>(906) 358-4477</td>
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<td>(616) 782-8998</td>
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<td>(231) 723-8288</td>
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<td>Nottawaseppi Huron Potawatomi</td>
<td>2221 1½ –Mile Rd.</td>
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<td>Gun Lake Tribe Match-e-be-nash-she-wish Band of Potawatomi Indians of Michigan</td>
<td>1743 142nd Avenue, PO Box 218</td>
<td>(616) 681-8830</td>
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### HISTORIC TRIBES

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<td>6461 E. Brutus Rd., PO Box 206</td>
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<td>Brutus, MI 49716</td>
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<tr>
<td>Swan Creek Black River Confederated Ojibwa Tribes of Michigan</td>
<td>1220 Court Street</td>
<td>(517) 799-0006</td>
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<tr>
<td>Grand River Band of Ottawa Indians</td>
<td>1251 Plainfield, N.E., PO Box 2937</td>
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<td>Mackinac Band of Chippewa &amp; Ottawa Indians</td>
<td>PO Box 371</td>
<td>(906) 484-2921</td>
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[http://www.michigan.gov/dhs/0,1607,7-124-5452_7124_7209-216627--00.html](http://www.michigan.gov/dhs/0,1607,7-124-5452_7124_7209-216627--00.html)
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Corrective Action – Termination or Reduction in Funding

CSPM Item 501
SUBJECT: Community Services Block Grant

CORRECTIVE ACTION - TERMINATION OR REDUCTION IN FUNDING

EFFECTIVE DATE
1/13/14

ISSUE DATE
1/13/14

REFERENCES

• The CSBG Act, P.L. 97-35 of 1981, as amended by the Coats Human Services Reauthorization Act of 1998

• U.S. Department of Health and Human Services, Office of Community Services, Information Memorandum 116 revised April 2, 2010

• Public Act 230 of 1981

• BCAEO Administrative Rules

PURPOSE

To establish policy and procedures for Corrective Action, Termination or Reduction in funding under the CSBG Program.

Section 676(b)(8) of the Act requires 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: Michigan’s definition of “eligible entity” is a community action agency (CAA).

Section 676(c) of the Act states that – For the purposes of making a determination in accordance with subsection (b)(8), with respect to:

1. A Funding Reduction -- the term ‘cause’ includes:

   a) a statewide redistribution of funds to respond to
      • the results of the most recently available census or other appropriate data;
      • the designation of a new eligible entity; or
      • severe economic dislocation; or
<table>
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b) the failure of an eligible entity to comply with the terms of an agreement or a State plan, or to meet a State requirement, as described in section 678C(a).

2. **A Termination -- the term ‘cause’ includes** the failure of an eligible entity to comply with the terms of an agreement or a State plan, or to meet a State requirement, as described in section 678C(a).

Section 678C(a) of the Act requires that states follow specific steps when issuing Corrective Action or imposing a Reduction or Termination in funding. Those steps have been incorporated into the following policy. Note: A determination to terminate the designation or reduce the funding of a CAA is reviewable by the Secretary of the federal Department of Health and Human Services (HHS).

**POLICY**

**A) Cause for a statewide redistribution of CSBG funds includes the state’s response to:**

1. The results of the most recently available census or other appropriate data;

2. The establishment of a new eligible entity; and

3. Severe economic dislocation.

**B) Pursuant to the BCAEO Administrative Rules (R 400.19603), cause for reducing the allocation to an agency or terminating funding to an agency includes the state’s response to:**

1. The agency’s governing board failure to exercise sufficient authority or leadership to ensure that BCAEO-administered funds are expended in accordance with applicable regulations, laws, or contractual obligations.

2. The agency’s administrative leadership failure to demonstrate that it has the administrative knowledge and skills required to ensure that the agency’s fiscal, personnel, program, or property management systems are adequate to support BCAEO funded projects.

3. The agency’s failure to property account for BCAEO-administered funds and property.

4. The agency’s lack of adequate general management systems to support BCAEO-funded programs.
5. The agency’s demonstrated lack of capacity for effective service delivery of BCAEO-funded programs.

6. The agency having liabilities which significantly exceed its assets.

7. The agency filing for bankruptcy.

8. The agency’s failure to make substantive improvement in problem areas identified in an audit or monitoring reports.

9. The agency’s failure to meet performance objectives. [Pursuant to the Act, Section 678C(a).]

C) Procedure

As defined in Section 678B(a) of the CSBG Act, the State will conduct monitoring visits and a full on-site review of each eligible entity at least once during each three-year period. The States will conduct an on-site review of each newly-designated entity immediately after the completion of the first year in which the entity receives CSBG funds.

The State will conduct follow-up and quality improvement plan/corrective action plan reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards, and requirements. The State will conduct other reviews as appropriate, including reviews of entities with programs that have had other Federal, State, or local grants other than assistance provided under CSBG terminated for cause.

The State will conduct reviews when informed that an eligible entity has grant funds terminated for cause under a related program, such as Head Start, the Low Income Home Energy Assistance Program (LIHEAP), the Weatherization Assistance Program, or other Federal programs. The State will include questions in routine monitoring visits and contacts about whether an eligible entity has had grant funds terminated for cause in any Federal, State, or local programs other than CSBG. The State will review the cause of termination for other Federal programs to assure that comparable issues do not exist for CSBG funds.

The State will thoroughly investigate any instances of “whistleblower” complaints or allegations of fraud or abuse of CSBG funds or funds from closely-related programs. In any instances in which complaints or allegations of fraud are considered credible and raise significant “red flags,” state and federal authorities will be informed of findings and may assist with additional compliance review or referral to appropriate investigative authorities.
If the state determines, on the basis of a final decision in a review pursuant to section 678B (Monitoring of Eligible Entities) of the Act, that a CAA has failed to comply with the terms of an agreement, or the State plan, to provide CSBG services or to meet appropriate standards, goals, and other requirements established by the State (see B above), BCAEO shall, pursuant to section 678C of the Act --

1. Inform the CAA of the deficiency to be corrected;

2. Require the CAA to correct the deficiency;

3. a) Offer training and technical assistance, if appropriate, to help correct the deficiency, and prepare and submit to the Secretary of HHS a report describing the training and technical assistance offered; or

   b) If BCAEO determines that such training and technical assistance are not appropriate, prepare and submit to the Secretary of HHS a report stating the reasons for this determination;

Examples of situations in which BCAEO may determine that technical assistance is not appropriate may include, but are not limited, to the following:

- A deficiency for which the eligible entity has the expertise and skills available within the organization to make corrective actions without assistance;

- A deficiency for which the State has previously provided technical assistance and the eligible entity has failed to institute corrective actions;

- Multiple, widespread, and/or repeated deficiencies that cannot feasibly be addressed through technical assistance;

- A deficiency that involves evidence of fraudulent reporting or use of funds, or other evidence or criminal wrongdoing.

4. a) The State will document the basis for such determination and the specific deficiency or deficiencies that must be corrected. The State will maintain records of correspondence or other communications related to an enforcement action against an eligible entity. At the discretion of BCAEO (taking into account the seriousness of the deficiency and the time reasonably required to correct the deficiency), allow the CAA to develop and implement, within 60 days after being informed of the deficiency, a quality
improvement plan/corrective action plan as instructed in Section 678C(a)(4) of the CSBG Act to correct such deficiency within a reasonable period of time, as determined by BCAEO; and

Examples of instances in which BCAEO may exercise discretion on whether a quality improvement plan is appropriate or necessary may include, but not limited to the following:

- A deficiency for which an eligible entity has previously instituted a corrective action plan and has repeated findings;
- A deficiency that involves evidence of fraudulent reporting or use of funds, or other evidence of criminal wrongdoing and therefore presents a risk requiring immediate action.

b) Not later than 30 days after receiving from the CAA a proposed quality improvement plan/corrective action plan pursuant to subparagraph a), either approve such proposed plan or specify the reasons why the proposed plan cannot be approved; and

5. Hold a public meeting in the service area to provide low income and other citizens living within the service area the opportunity to review and comment upon the strengths and weaknesses of the existing community action agency.

a) To obtain the floor (right to speak) an attendee must be the first to stand when the person speaking has finished and must be recognized by the BCAEO Director before speaking.

b) All remarks must be contained to 2 to 5 minutes and is at the discretion of the BCAEO Director.

c) Adequate accommodations will be secured to hold the public meeting. If the amount of attendees exceeds the room capacity, attendees will be given the opportunity to submit written comments.

d) Written public comments will also be accepted up to 7 days after the public meeting
6. After providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the CSBG funding of the CAA unless the entity corrects the deficiency.

D) Review

Pursuant to Section 678C, a determination to terminate the designation or reduce the funding of a CAA is reviewable by the Secretary of HHS. The Secretary shall, upon request, review such determination. The review shall be completed no later than 90 days after the Secretary receives from BCAEO all necessary documentation relating to the determination to terminate the designation or reduce the funding. If the review is not completed within 90 days, the determination of BCAEO shall become final at the end of the 90th day.
CAA

Service Area Map
CSBG-IS FY2013 Database Reports
2014 CSBG HIGHLIGHTS
From the MI FY 2013 Community Services Block Grant Information System Survey

Michigan
CSBG NETWORK PARTICIPANTS

Michigan administers CSBG to 29 agencies in 100% of MI counties

64% of MI families served were in poverty, and 32% of MI families served were in severe poverty

MI CSBG agencies provided services to 182,138 low-income individuals in 89,120 families

Vulnerable populations served by MI CSBG agencies included:

- 51,567 children
- 26,516 people with disabilities
- 55,621 seniors
- 14,838 people who lacked health insurance

CAAs invest in their staff and board members to improve their capacity to best serve families with low incomes.

Statewide there are 2 nationally certified ROMA trainers and 2 Certified Community Action Professionals.

CSBG NETWORK RESOURCES

For every $1 of CSBG, the MI Network leveraged $4.21 from state, local, and private sources, including the value of volunteer hours

- $1.37 State
- $1.07 Local
- $1.23 Private
- $0.54 Value of Volunteer Hours
- $4.21

$24,841,427 CSBG funds supported the core activities of the MI CSBG Network

The MI CSBG Network’s funding totaled $333,813,669

Including all federal sources, the MI CSBG Network leveraged $13.39 per $1 of CSBG
CSBG Performance Outcomes for Michigan

The MI CSBG Network addressed 556,640 conditions of poverty that create barriers to economic security.

<table>
<thead>
<tr>
<th>Barriers Addressed</th>
<th>These barriers were measured by:</th>
</tr>
</thead>
<tbody>
<tr>
<td>20,068 Employment or Work Supports</td>
<td>Low-income participants in CSBG Network employment initiatives obtained supports which reduced or eliminated barriers to initial or continuous employment, acquired a job, obtained an increase in employment income, or achieved &quot;living wage&quot; employment and benefits.</td>
</tr>
<tr>
<td>31,610 Economic Asset Enhancement and Utilization</td>
<td>Low-income households achieved an increase in financial assets or financial skills as a result of CSBG Network assistance.</td>
</tr>
<tr>
<td>65,783 Child and Family Development</td>
<td>Infants, children, youth, parents, and other adults participated in developmental or enrichment programs facilitated by the CSBG Network and achieved program goals.</td>
</tr>
<tr>
<td>66,987 Independent Living for Low-Income Vulnerable Populations</td>
<td>Low-income vulnerable individuals received services from the CSBG Network and secured or maintained an independent living situation as a result.</td>
</tr>
<tr>
<td>92,928 Family Stability</td>
<td>Low-income participants obtained supports which reduced or eliminated barriers to family stability through assistance from the CSBG Network.</td>
</tr>
<tr>
<td>252,022 Emergency Assistance</td>
<td>Low-income individuals and families received emergency assistance from the CSBG Network.</td>
</tr>
<tr>
<td>9,773 Community Opportunities and Resources</td>
<td>Community opportunities or resources were improved or expanded for low-income people as a result of CSBG Network projects or initiatives, or advocacy with other public and private agencies.</td>
</tr>
<tr>
<td>17,469 Community Empowerment</td>
<td>Community members and low-income people mobilized to engage in activities that support and promote their own well-being and that of their community as a direct result of CSBG Network initiatives through maximum feasible participation.</td>
</tr>
</tbody>
</table>
Michigan

Selected Data Highlights by Agency

<table>
<thead>
<tr>
<th>Service Addressed</th>
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<th>Children</th>
<th>Seniors</th>
<th>Volunteer Hours</th>
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<th>Over-Federal/Unappropriated by $ (CSBG)</th>
<th>% In poverty</th>
</tr>
</thead>
<tbody>
<tr>
<td>Algoma-Marquette Community Action Board</td>
<td>3,703</td>
<td>2,432</td>
<td>593</td>
<td>2,138</td>
<td>$220,944</td>
<td>11.17%</td>
<td>72.3%</td>
</tr>
<tr>
<td>Allen County Resource Development Committee, Inc.</td>
<td>3,393</td>
<td>2,013</td>
<td>693</td>
<td>1,820</td>
<td>$220,000</td>
<td>14.35%</td>
<td>69.2%</td>
</tr>
<tr>
<td>Area Community Services - Rehabilitation &amp; Training Program</td>
<td>4,505</td>
<td>1,538</td>
<td>1,255</td>
<td>4,936</td>
<td>$148,930</td>
<td>12.05%</td>
<td>58.7%</td>
</tr>
<tr>
<td>Baraga-Toftrees-Hurunee Community Action Agency, Inc.</td>
<td>2,401</td>
<td>1,351</td>
<td>540</td>
<td>1,620</td>
<td>$220,000</td>
<td>13.51%</td>
<td>74.2%</td>
</tr>
<tr>
<td>Blue Water Community Action</td>
<td>4,005</td>
<td>3,549</td>
<td>742</td>
<td>1,350</td>
<td>$320,000</td>
<td>24.90%</td>
<td>62.7%</td>
</tr>
<tr>
<td>Central Area Community Services, Inc.</td>
<td>11,622</td>
<td>16,234</td>
<td>4,809</td>
<td>6,011</td>
<td>$1,189,034</td>
<td>11.14%</td>
<td>62.1%</td>
</tr>
<tr>
<td>Chippewa-Lake-Mackinac Community Action and River Resources Authority</td>
<td>11,273</td>
<td>1,096</td>
<td>352</td>
<td>283</td>
<td>$220,000</td>
<td>13.84%</td>
<td>60.4%</td>
</tr>
<tr>
<td>City of Detroit, Department of Human Services</td>
<td>36,537</td>
<td>22,369</td>
<td>6,919</td>
<td>5,954</td>
<td>$56,120</td>
<td>5.52%</td>
<td>52.0%</td>
</tr>
<tr>
<td>Community Action Agency of Jackson, Jackson, and St. Clair Counties</td>
<td>17,874</td>
<td>2,900</td>
<td>1,167</td>
<td>518</td>
<td>$220,000</td>
<td>4.35%</td>
<td>61.8%</td>
</tr>
<tr>
<td>County of Kalamazoo Community Action Board</td>
<td>3,941</td>
<td>860</td>
<td>370</td>
<td>80</td>
<td>$220,000</td>
<td>4.27%</td>
<td>75.4%</td>
</tr>
<tr>
<td>Dickinson Area Community Services Agency</td>
<td>1,381</td>
<td>1,492</td>
<td>268</td>
<td>145</td>
<td>$220,000</td>
<td>4.63%</td>
<td>65.7%</td>
</tr>
<tr>
<td>Eight ASP, Inc.</td>
<td>5,151</td>
<td>7,325</td>
<td>5,151</td>
<td>1,782</td>
<td>$88,028</td>
<td>7.80%</td>
<td>61.9%</td>
</tr>
<tr>
<td>FairCAP, Inc.</td>
<td>9,867</td>
<td>10,777</td>
<td>3,180</td>
<td>1,942</td>
<td>$220,000</td>
<td>4.13%</td>
<td>41.0%</td>
</tr>
<tr>
<td>Gogebic Ontonagon Community Action Agency</td>
<td>24,300</td>
<td>1,497</td>
<td>416</td>
<td>2,205</td>
<td>$220,000</td>
<td>3.35%</td>
<td>67.9%</td>
</tr>
<tr>
<td>Hancock Development Commission</td>
<td>18,425</td>
<td>11,290</td>
<td>2,828</td>
<td>4,442</td>
<td>$220,000</td>
<td>3.24%</td>
<td>59.5%</td>
</tr>
<tr>
<td>Macomb County Community Services Agency</td>
<td>16,425</td>
<td>16,425</td>
<td>1,732</td>
<td>51,160</td>
<td>$220,000</td>
<td>3.15%</td>
<td>63.3%</td>
</tr>
<tr>
<td>Manistee-Delta-Schoolcraft Community Action Agency and Human Resources Authority</td>
<td>9,775</td>
<td>1,158</td>
<td>582</td>
<td>1,172</td>
<td>$301,090</td>
<td>3.09%</td>
<td>63.6%</td>
</tr>
<tr>
<td>Mid Michigan Community Action Agency, Inc.</td>
<td>32,108</td>
<td>10,709</td>
<td>3,839</td>
<td>4,370</td>
<td>$50,715</td>
<td>3.30%</td>
<td>62.8%</td>
</tr>
<tr>
<td>Monroe County Opportunity Program</td>
<td>14,375</td>
<td>12,060</td>
<td>6,306</td>
<td>1,795</td>
<td>$220,000</td>
<td>3.05%</td>
<td>76.7%</td>
</tr>
<tr>
<td>Muskegon-Oceana-Coshocton Community Action Partnership, Inc.</td>
<td>10,190</td>
<td>1,172</td>
<td>474</td>
<td>629</td>
<td>$220,000</td>
<td>3.17%</td>
<td>60.6%</td>
</tr>
<tr>
<td>Northwest Michigan Community Service Agency</td>
<td>46,725</td>
<td>2,380</td>
<td>540</td>
<td>777</td>
<td>$220,000</td>
<td>3.09%</td>
<td>73.0%</td>
</tr>
<tr>
<td>Northwest Michigan Community Action Agency</td>
<td>54,325</td>
<td>3,670</td>
<td>1,855</td>
<td>897</td>
<td>$220,000</td>
<td>3.75%</td>
<td>68.3%</td>
</tr>
</tbody>
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Printed On: 06/04/2014

NASCSP CSBG IS FY 2013

Michigan

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</thead>
<tbody>
<tr>
<td>Oakland-Orick-Hines Human Services Agency</td>
<td>38,960</td>
<td>5,294</td>
<td>5,200</td>
<td>3,500</td>
<td>$220,000</td>
<td>3.03%</td>
<td>59.3%</td>
</tr>
<tr>
<td>Otisville Community Action Agency</td>
<td>7,739</td>
<td>1,830</td>
<td>600</td>
<td>1,200</td>
<td>$220,000</td>
<td>3.20%</td>
<td>48.9%</td>
</tr>
<tr>
<td>Saginaw County Community Action Committee, Inc.</td>
<td>6,211</td>
<td>4,993</td>
<td>1,224</td>
<td>1,908</td>
<td>$220,000</td>
<td>2.92%</td>
<td>68.4%</td>
</tr>
<tr>
<td>Southeast Michigan Community Action Agency</td>
<td>1,542</td>
<td>5,498</td>
<td>1,274</td>
<td>1,454</td>
<td>$220,000</td>
<td>1.85%</td>
<td>90.5%</td>
</tr>
<tr>
<td>Washington County Employment &amp; Training and Human Resources Services</td>
<td>1,474</td>
<td>1,244</td>
<td>647</td>
<td>1,350</td>
<td>$220,000</td>
<td>1.98%</td>
<td>91.4%</td>
</tr>
<tr>
<td>Wayne Metropolitan Community Action Agency</td>
<td>53,743</td>
<td>6,496</td>
<td>1,237</td>
<td>1,232</td>
<td>$220,000</td>
<td>4.24%</td>
<td>68.3%</td>
</tr>
</tbody>
</table>

Total | 54,965 | 1,383 | 5,407 | 95,265 | $220,000 | 4.24% | 68.3% |

Printed On: 05/04/2014

NASCSP CSBG IS FY 2013
Unexpended Funds – Carry-Forward Policy

CSPM Item 507
SUBJECT: Community Services Block Grant

UNEXPENDED FUNDS – CARRY-FORWARD POLICY

Effective Date
7/12/12

Issue Date
7/12/12

REFERENCES

The Community Services Block Grant (CSBG) Act, P.L. 97-35 of 1981, as amended by the Coats Human Services Reauthorization Act of 1998: Sec. 675C.(a), (3) Recapture and Redistribution of Unobligated Funds

PURPOSE

To provide policy regarding the carry forward of unobligated/unexpended CSBG funds that are allocated to community action agencies (CAAs) by formula.

Sec. 675C.(a), (3) “Recapture and Redistribution of Unobligated Funds” provides that:

a State may recapture funds, distributed to an eligible entity through a grant, that are unobligated/unexpended at the end of a fiscal year if such funds exceed 20 percent of the amount distributed to the entity for that fiscal year. It also allows the State to redistribute the recaptured funds to other eligible entities.

Note: Michigan’s definition of “eligible entity” is a CAA.

POLICY

Unexpended funds within 20 percent of a Grantee’s annual allocation (allocation includes any discretionary funds allocated to Grantee to bring its funding up to a minimum level) will be returned to the Grantee for carry forward.

Example: Grantee must spend 100 percent of any carry-in, plus 100 percent of any recaptured and redistributed funds, plus a minimum of 80 percent of their annual allocation to be eligible to carry forward unexpended funds.

Unexpended funds exceeding 20 percent will be recaptured and redistributed as noted below

Note: This policy does not apply to discretionary funds allocated to Grantees for T/TA activities; unexpended T/TA funds may not be carried forward.

1. The amount of funds to be recaptured will be determined based on the fiscal year’s final September 30 Statement of Expenditures (SOE) report. Final SOE reports must be submitted no later than December 31.

2. Recaptured funds will be distributed during the second quarter of the following fiscal year when the fiscal year’s final allocations are made (based on receipt of the final state allotment from HHS) and allowable carry-forward is returned to the Grantees.

3. Recaptured funds will be distributed as follows:

   • **Recaptured funds totaling less than $20,000**: Such funds will be added to the final amount identified each fiscal year to be distributed to all Grantees by formula. The regular funding allocation formula will then be applied to the total funds to be distributed and the resulting amounts will become the formula allocations for that fiscal year.

   • **Recaptured funds totaling $20,001—$200,000**: Such funds will be distributed equally to Grantees who have spent 100 percent of their prior year’s allocation, carry-in, and any recaptured funds.

   • **Recaptured funds exceeding $200,000**: DHS will determine a distribution formula to include Grantees who spent between 90—100 percent of their prior year’s allocation, 100 percent of their carry-in, and 100 percent of any recaptured funds.
Environmental Tobacco Smoke Certification
CERTIFICATION REGARDING ENVIRONMENTAL TOBACCO SMOKE

Public Law 103-227, Part C Environmental Tobacco Smoke, also known as the Pro Children Act of 1994, requires that smoking not be permitted in any portion of any indoor routinely owned or leased or contracted for by an entity and used routinely or regularly for provision of health, day care, education, or library services to children under the age of 18, if the services are funded by Federal programs either directly or through State or local governments, by Federal grant, contract, loan, or loan guarantee.

The law does not apply to children's services provided in private residences, facilities funded solely by Medicare or Medicaid funds, and portions of facilities used for inpatient drug or alcohol treatment. Failure to comply with the provisions of the law may result in the imposition of a civil monetary penalty of up to $1000 per day and/or the imposition of an administrative compliance order on the responsible entity.

By signing and submitting this application the applicant/grantee certifies that it will comply with the requirements of the Act.

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

Signature _________________________________  Date:  ___________________________

Title:  Maura D. Corrigan, Director
Organization:  Michigan Department of Human Services
Lobbying–Contracts, Grants, Loans...Certification
CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

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

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

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

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

Statement for Loan Guarantees and Loan Insurance

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

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

Signature _________________________________  Date:  ___________________________
Title:  Maura D. Corrigan, Director
Organization:  Michigan Department of Human Services
Debarment, Suspension...Certification
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 Exclusion-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 it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the
certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

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

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

************

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

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

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

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

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

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

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

Grant Number: FY2013 CSBG

Signature: ______________________________________  Date: ______________________
Title: Maura D. Corrigan, Director
Organization: Michigan Department of Human Services
Drug-Free Workplace Certification
CERTIFICATION REGARDING DRUG-FREE WORKPLACE REQUIREMENTS

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

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

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.

2. The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.

3. For grantees other than individuals, Alternate I applies.

4. For grantees who are individuals, Alternate II applies.

5. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.

6. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio studios).

7. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).

8. Definitions of terms in the Non-procurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

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

   Conviction means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;
Criminal drug statute means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

Employee means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All direct charge employees; (ii) All indirect charge employees unless their impact or involvement is insignificant to the performance of the grant; and, (iii) Temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Grantees Other Than Individuals)

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

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

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

1. The dangers of drug abuse in the workplace;

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

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

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

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

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

1. Abide by the terms of the statement; and

2. Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e) Notifying the agency in writing, within ten 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 convicting 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 following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any worker 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).

(h) The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:
Place of Performance (Street address, city, county, state, zip code)

Street: 235 South Grand Avenue
City: Lansing,
County: Ingham
State: Michigan 48909

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

Alternate II. (Grantees Who Are Individuals)

(a) The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;
(b) If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other designee, unless the Federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.

[55 FR21690, 21702, May25, 1990]

Signature:____________________________________ Date: ____________________
Title: Maura D. Corrigan, Director
Organization: Michigan Department of Human Services
R O M A

National Performance Indicators

Sample Logic Model
## Sample Logic Model

**Organization:** CAA Name  
**Program:**  □ Family  □ Agency  □ Community

<table>
<thead>
<tr>
<th>Need, Problem, Situation</th>
<th>Service/Strategy</th>
<th>Outcome/Result</th>
<th>Outcome Indicator</th>
<th>Results</th>
<th>Measurement Tools</th>
<th>Data Source</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>The need/problem/situation should be determined by your Community Needs Assessment. This column will show the specific need which determined why your agency should have this program.</td>
<td>List the strategies or services that your agency will provide to reach the outcome or the result identified in Column 3. The services need to match the needs and the outcomes identified for the program. If the program has been identified as Family or Community or Agency the services/strategies should be identified as Family or Community or Agency.</td>
<td>The outcome/result can be considered the benefit that comes from this activity. This is identifiable with the Intervention in FACS Pro. The interventions are linked to NPI’s in FACS Pro. Ex. Client received utility payment. The outcome needs to match the type of outcome you have chosen (family, agency, community). Goals 1 &amp; 6 of the National Performance Goals are Family outcomes, Goals 4 &amp; 5 is Agency outcomes, and Goals 2 &amp; 3 is Community Outcomes.</td>
<td>The outcome indicator clarifies the outcome/result. This is where the agency quantifies the change that you expect to achieve with your agency’s strategies and services. The agency should look at their services listed and ask the question “how many will enroll in the program and of those how many will be served?”</td>
<td>This column is not determined until the end of the program year. This would take the number enrolled and the number that reached their outcome and provide a percentage. Example: 25 out of 50 individuals remained in their home.</td>
<td>This column lists specific tools used to measure the outcomes and indicators identified in the previous columns. Example: Sign in sheets, letter from mortgage company confirming new mortgage.</td>
<td>This column should list where data is stored i.e. statewide database, case records, etc. Example: Data stored in agency database and is collected by the Case Manager by having the customer return the mortgage documentation.</td>
<td>This column is asking how often data is collected. I.e. daily, monthly, quarterly, upon request, etc. Example: Monthly</td>
</tr>
<tr>
<td>Example: Families are at risk of losing their homes</td>
<td>Example: Provide Housing Counseling</td>
<td>Example: Families remain in their home.</td>
<td>Example: Say that you provide housing counseling for 20 families. 8 of those renegotiate their mortgage payments. The outcome indicator would be 8 out of 20 families will secure renegotiated mortgage payments within the 12 month grant period.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**MISSION:** This is the mission of the program and should identify the population the program serves; they type of services/interventions offered, any partnerships/relationships/collaborations with other entities, the desired results, outcomes, or impacts the program is trying to achieve. This is question 3 on Attachment D of the CSBG Application.