REFERENCES

- The Community Services Block Grant Act (42 U.S.C. 9901 et seq.) as amended
- U.S. Department of Health and Human Services, Office of Community Services, Information Memorandum 116 revised April 2, 2010
- 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
CORRECTIVE ACTION – TERMINATION OR REDUCTION IN FUNDING

- severe economic dislocation; or
  
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 properly 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 (QIP/CAP) 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.
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 of 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 QIP/CAP 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 QIP/CAP 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 QIP/CAP pursuant to subparagraph a), either approve such proposed plan or specify the reasons why the proposed plan cannot be approved; and

5. If the BCAEO does not accept the QIP/CAP, the BCAEO, after providing adequate notice of impending termination proceedings and an opportunity for a hearing, may initiate proceedings to terminate/dedesignate or reduce the funding of a CAA; and

6. If the BCAEO has implemented sanctions against a CAA and the CAA has failed to comply with the QIP/CAP, the BCAEO may request of the CAA’s Board of Directors the voluntary relinquishment of the CSBG program and their designation as a CSBG eligible entity. If the CAA
accepts to voluntarily relinquish the CSBG program, the BCAEO will commence contract termination proceedings. If the CAA rejects voluntarily relinquishment of the CSBG program or the BCAEO does not accept the CAA’s QIP/CAP, the BCAEO will initiate procedures for a public meeting.

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.

Any right or remedy given to the BCAEO by this policy does not preclude the existence of any other right or remedy, nor shall any action or lack of action by the BCAEO in the exercise of any right or remedy be deemed a waiver of any other right or remedy.
D) Review

The BCAEO will notify the subrecipient that it has the right under Section 678C of the act to seek review of the decision by the Secretary of HHS.

1. If the Secretary does not overturn the decision, or if the CAA does not seek HHS review, the BCAEO will initiate proceedings to terminate the designation and close-out the contract.

2. If a review is requested, the review shall be completed no later than 90 calendar days after the Secretary receives from the CAA all necessary documentation relating to the determination to terminate the designation or reduce the funding. If the review is not completed within 90 calendar days, the determination of BCAEO shall become final at the end of the 90th day.
REFERENCES

- The Community Services Block Grant Act (42 U.S.C. 9901 et seq.) as amended
- Annual Update of the Department of Health and Human Services (HHS) Poverty Guidelines
- CSPM Item 208 – Poverty Income Guidelines
- 45 C.F.R. 2552.47

PURPOSE

The CSBG Act, Section 673(2) of the COATES Human Services Reauthorization Act of 1998, requires the use of the HHS Poverty (income) Guidelines as an eligibility criterion for the CSBG program.

POLICY

Grantees will determine their own policies, based on local decisions, of what specific assistance/services will be provided to their clients as well as any non-income related eligibility criteria.

Client File

Grantees must maintain a client file for all recipients of CSBG services. All required file documents must be maintained by the agency including uploading documents to FACSPRO (See CSPM Item 909).

Income Eligibility Determination

Use the 125% of poverty income guidelines to determine eligibility for services provided with CSBG funds. Income refers to total cash receipts (gross) before taxes from all sources (see Income Inclusions/Exclusions below) for all household members. *Exception: See the Income Eligibility Determination Exception.*

Automatic Income Eligibility

Free income tax preparation assistance service is the only CSBG service with automatic eligibility. Individuals or households that are eligible for any service being provided by the Grantee will be eligible for free income tax preparation assistance services. Grantees must maintain client eligibility documentation for the service the client was, or is, eligible for, using FACSPRO. (See CSPM 302)
Household Composition

Income from all household members is used to determine income eligibility. A household is all persons occupying a housing unit, regardless of whether they are related.

**Exception:** For income eligibility purposes, Foster Children are not to be included as household members and Foster Care payments/subsidies are not to be included as income.

**Absent Household Members**
Household members who are absent from the home for 90 consecutive days or more are excluded from the household and therefore, their income is excluded.

**Roomers**
For applicants/households that have “roomers” paying rent, the “roomer” is not considered a member of the “household” and the income of the “roomer” is not counted for income eligibility. However, the rent from the roomer should be included as income. When annualizing income, the income from rent payments should only be included for the months that rent was received.

For applicants/households that are “roomers” paying rent, only the income of the “roomer” is counted for income eligibility (the income of the home owner/principle renter is not counted).

Documentation of "roomer" status must be provided including:

1. A written and signed statement from the home owner/principle renter that the applicant is a "roomer" and is paying monthly rent in the amount of $____.
2. A copy of a canceled check or monthly bank statement showing the check amount and the payee.
3. If the payment transaction was in cash, or a canceled check or monthly bank statement is not available, ask the applicant to get a written receipt from the homeowner for the last month's rent paid (this could be incorporated in #1 above if necessary).

**Income Computations**

An applicant’s household’s gross income for the preceding three-month period including the date of application must be computed in FACSPro to be **annualized**. For example, an application dated June 7 would have a three-month period of March 8 –
June 7. Income must be entered into FACSPro using the Annual option and entering the last three months of income. **All income** must be included and documented.

**Note:** If a three-month lookback period is not representative of a household member’s annual income, grantees have the option of requesting a six or twelve-month period of documentation. An explanation of using this option must be clearly noted.

For each household member, the income computation process should include actual received current gross income documentation, current and prior monthly benefit documentation, W-2s or income tax returns for prior year’s income, and, **as a last resort**, self-declarations. (See **Self-Declarations** below).

**Irregular Income** – For irregular income such as child support not following the court order or migrant/seasonal workers only getting money seasonally, determine the standard monthly amount by adding the amounts entered together and dividing by the number of months used. Clearly document the income computation method and source.

**Best Practice** – Pay period ending dates should not be used unless it is documented that the applicant/household member receives their payments on the same date.

**Documentation of Income**

All income must be thoroughly documented and uploaded to FACSPro. (See CSPM Item 909)

**Note:** A signed self-declaration of the applicant may be used, but only as a last resort. The intake worker should record the steps taken that will demonstrate a reasonable effort was made to obtain income documents.

**Self-Declarations of Income**

After all other avenues of documenting income eligibility are exhausted, self-declaration is allowable, **but evidence of the various attempts at proving eligibility must be contained in the client file, including** a notarized statement signed by the applicant indicating that no other proof of income is available.

If the self-declaration is for zero income **for the entire household**, then along with the declaration being notarized, approval by MDHHS BCAEO staff is also required, and a copy of the approval must be in the client file. Requests for approval must be submitted by email to the Grantee’s grant manager.
The requests should include the name and FACSPro System ID for each household member and an explanation of how the household is paying for their living costs.

Self-Declarations of Income for Migrants

Self-Declarations of Income for Migrants may be used to capture income information as a last resort after all other options have been exhausted. Due to the nature and frequent changes in employment of Migrants, it is not necessary to complete the income screens in FACSPro for this population. The documentation is required to contain case notes of why the Self-Declaration was used by Grantee staff and uploaded into FACSPro as part of the case file and detailed notes. The annualized income must adhere to CSBG FPL guidelines. (Refer to CSPM 502 and CSPM 909.)

Timeframe between Eligibility Determination and Service Provided

The allowable timeframes between eligibility determination and provision of specific assistance/services which have a direct monetary value attached (such as: payment on behalf of the client for delinquent bills, lodging, repair services, medical services, etc. or vouchers for food, clothing, furniture, equipment, etc.) are as follows:

- Services should be provided within 30 days of the initial eligibility determination.
- If additional services are requested after 30 days of eligibility determination - but within 6 months/180 days of eligibility determination, the Grantee must document that the client is still income-eligible for each service.

If the client states that there has been no significant change in the household income status, the Grantee may take a signed, and dated, notarized self-declaration from the client documenting that “there has been no significant change in the household income status since the date of the initial service application.” The self-declaration should be maintained in the client file with the original client application, the original income documentation and documentation of benefit(s) provided.

- Eligibility must be redetermined and a new application taken (including receipt of the required income documentation) for any direct monetary service to be provided after 6 months/180 days of the original eligibility determination.

Ongoing Services

The above requirements do not apply to “ongoing services” provided by the Grantee where eligibility for a program/project is determined at the beginning of the
**INCOME ELIGIBILITY GUIDELINES**

**SUBJECT:** Community Services Block Grant

**EFFECTIVE DATE**
10.01.17

**ISSUE DATE**
9.14.17

Program/project period (e.g., senior transportation, housekeeping or snow removal; on-site day/after school care; home-delivered meals, etc.).

**INCOME INCLUSIONS/EXCLUSIONS**

**Income Includes** (there are no stipulations on spending)

1. Gross money, wages/earnings and salaries before any deductions.

2. Self-Employment/Net receipts from nonfarm or farm self-employment: receipts from a person's own business or from an owned or rented farm after deductions for business or farm expenses. *(See Self-Employment Income below)*

3. Regular gross benefit payments, including any Medicare premiums, from the Social Security Administration (e.g., SSDI-Social Security Disability Insurance, RSDI-Retirement, Survivor, Disability Insurance, et.)

4. Railroad retirement benefits.

5. Unemployment compensation, or strike benefits from union funds.

6. Worker's compensation.

7. Veteran's payments.


9. Supplemental Security Income (SSI)

10. SSI State of Michigan Payment. (e.g., State SSI quarterly payment).

11. Training stipends.

12. Court-order child support and Alimony.


15. Insurance or annuity payments.
16. Income from individual retirement accounts (IRAs) received during the three-month calculation period, whether as monthly or lump-sum withdrawals.

17. Dividends, interest, net rental income, net royalties, periodic receipts from estates or trusts.

18. Net gambling or lottery winnings.

19. Any lump sum payments received by Native Americans, such as from Casino income or other tribal income.

20. Combat zone pay to the military (if there are no restrictions on use).

21. Joint Income received by more than one individual. Divide the income equally among recipients.

22. Third party benefits paid directly to a company for a client’s housing or bills. Third party benefits are only counted as income if they are paid to a company or entity in lieu of paying an individual child support, alimony or wages directly.

**Lump Sum Payments**

**Note:** Retroactive lump sum payments for Social Security, SSI, Railroad Retirement Benefits and Lump-sum IRA withdrawals should be prorated on a 12-month basis so that only benefits covering the three-month calculation period are included.

**Income Excludes** (includes examples that are limited in what the income can be spent on.)

1. Housing assistance to the military.

2. Capital gains.

3. Any emergency assistance program payments.

4. College or university scholarships, grants, fellowships and assistantships, VA Education Benefits (GI Bill).

5. Any assets resulting from withdrawals from a bank; or the sale of property, a house or a car.

6. Tax refunds, gifts, loans, lump sum inheritances, one time insurance payments or compensation for injury.
7. Noncash benefits such as employer or union paid portion of health insurance, or other employee fringe benefits; food or housing received in lieu of wages; the value of food and fuel produced and consumed on farms; the imputed value of rent from owner-occupied nonfarm or farm housing.

8. Federal noncash benefit programs such as Medicare (Medicare premium payments are not excluded), Medicaid, food stamps (including cash received in lieu of food stamps), school lunches and housing assistance.

9. Student Income - Income earned through employment by a child who is age 18 and under, and attends school.

   **NOTE:** “Earnings” do not include program benefits such as Social Security, Supplemental Security Income, etc.; these are included in the total household income.

10. Adoption subsidies and foster care payments, including Foster Grandparent payments. (If there are no restrictions on use, then it should be included as income).

**Self-Employment Income**

Self-employment income must be documented for each type of self-employment activity or business. Business expenses may be deducted from the gross income amount determined for each self-employment activity/business. Documentation of claimed expenses must be included in the client file information.

**NOTE:** Losses from a single self-employment source of income cannot be applied to any other self-employment income or other household income types. In other words, if self-employment business A realizes a loss of $10,000, the income from that source is considered zero. The $10,000 loss cannot be deducted from self-employment business B or other household income.

**Self-Employment Expenses**

Allowable expenses (deduct from income):

- Identifiable expenses of labor, stock, raw material, seed, fertilizer, etc.
- Interest and principal on loans for equipment, real estate or income-producing property.
- Insurance premiums on loans for equipment, real estate and other income-producing property.
• Taxes paid on income-producing property.
• Transportation costs while on the job (example: fuel).
• Purchase of capital equipment.
• A child care provider’s cost of meals for children. Do not allow costs for the provider’s own children.
• Any other identifiable expense of producing self-employment income except those listed below.

Unallowable expenses (not deducted from income):
• A net loss from a previous period.
• A net loss from another type of self-employment.
• Federal, state and local income taxes.
• Personal entertainment or other individual business expenses.
• Money set aside for retirement.
• Depreciation on equipment, real estate or other capital investments.

INCOME ELIGIBILITY DETERMINATION EXCEPTION

When CSBG funds support short term services with limited intake procedures, and individual income verification is not possible or practical, the Grantee may not always be required to conduct individualized eligibility determinations. This may happen if services are:

1. Provided to a group, rather than to individuals, and circumstances indicate that group members will predominantly be income-eligible
   Examples:
   a. Financial literacy (or other program) information and materials provided at community gathering in low-income area or to Head Start parents
   b. Donations of food or meals
   c. Summer meals for youth

2. Provided on individual basis but impossible or impracticable to obtain income documentation
   Examples:
   a. Part of outreach to potential clients, such as open house at CAA
   b. Initial intake and information referral process
   c. Temporary shelter to homeless individuals
   d. Disaster relief

3. Intended to increase community awareness of or involvement in poverty issues
   a. Poverty Forum
   b. Building Partnerships with other organizations
NOTE: CAAs should make every effort possible to obtain client information to include in the CSBG Annual Report.

To exclude eligibility determination for certain programs/clients, CAAs must document the following:

a. Name of program  
b. Service Area  
c. Reason for eligibility determination exclusion (1, 2, or 3 above – or other)  
d. Proof that the clients will be predominantly income-eligible. (Census data, Community Assessment documentation of the neighborhood, percentage of low-income people in area, etc.)

NOTE: For all programs that are supported by CSBG funds, Grantees must provide reasonable, documented evidence that the proportion of program clients who are CSBG-eligible is equal to or greater than the proportion of program costs paid with CSBG funds, or the proportion of program staff time devoted to serving CSBG-eligible clients is equal to or greater than the proportion of program costs paid with CSBG funds.

Example: if CSBG supports 30% of a program’s costs, then the agency must be able to demonstrate that at least 30% of the clients served have incomes at or below 125% of the federal poverty level, or at least 30% of staff time is allocated to serving CSBG-eligible clients.

Example: if 10% of clients are documented as eligible, no more than 10% of funds should come from CSBG.

Example: The CAA could provide evidence that due to the venue in which a particular service is provided, such as meals provided in an emergency homeless shelter, it could reasonably be assumed that clients meet the CSBG income guidelines.
REFERENCES

- The Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) as amended
- Information Memorandum No. 138
- Current CSBG Agreement

PURPOSE

In accordance with Assurance 11 of the CSBG Act, the State Department is required to secure from each eligible entity, as a condition of funding, a Plan that includes a needs assessment for the communities served.

A community needs assessment, referred to in the Organizational Standards and in this document as the Community Assessment (CA), identifies the strengths and resources available in the community to meet the needs of seniors, youth, and low-income families. The CA focuses on the capabilities of the community, including its citizens, agencies, and organizations. It provides a framework for developing and identifying services and solutions and building communities that support and nurture children and families.

In 2015, the United States Department of Health and Human Services issued Information Memorandum No.138 establishing CSBG Organizational Standards requiring Community Action Agencies to conduct a CA and develop a Community Action Plan to address the needs identified in the CA.

A CA may be limited to a compilation of demographic data from census records, results of surveys conducted by others, and informal feedback from community partners. Or, assessments may be expanded to include focus group discussions, town meetings, interviews with stakeholders, and telephone or mailed surveys to partnership members and the community.

POLICY

Each eligible entity is required to keep their most current comprehensive CA in FACSPro as part of their CSBG Application Plan, in order to be in compliance with the fiscal and administrative compliance of the CSBG program. A new CA must be conducted every three years.

A CA is a systematic process of obtaining and analyzing information to determine the current status and service needs of a community.
The process used must be flexible enough to respond to the continually changing socioeconomic and demographic environments.

A decision must be made to determine who will conduct the CA; what information will be collected; what methodology will be used to collect the information and how the information will be used.

**Community Assessment**

- Must be conducted every three (3) years for the specific community(ies)/region served by the community action agency and reported out on. ([Organizational Standard 3.1](#))

- Must be kept current in FACSPro as part of the CSBG Application Plan.

- Must utilize information gathered from key sectors of the community in assessing needs and resources. These sectors would include at minimum: community-based organizations, faith-based organizations, private sector, public sector, and educational institutions. ([Organizational Standard 2.2](#))

- Should include an assessment summary that outlines current needs, new or projected needs, and unmet needs.

- May be coordinated with needs assessments conducted for other programs within the agency. *(e.g. The Head Start Community Assessment requires the agency to use data that describes community strengths, needs, and resources.)*

- May focus on a specific program or target population in some instances (carryover or discretionary funds.)

**Uses of CA**

After the data is collected, thoroughly examined and interpreted, the results should be used as a starting point for establishing priority of services and planning of resources. In addition to the level of priority of need, the information can assist eligible entities to:

- Create the agency's Community Action Plan, ([Organizational Standard 4.2](#))
- Assist with the strategic planning process. ([Organizational Standard 6.4](#))
- Manage programs more effectively;
- Refine or eliminate existing programs;
- Prevent duplication of programs;
• Identify gaps in human service provision;
• Identify barriers to attaining self-sufficiency;
• Identify strategies for overcoming barriers to self-sufficiency;
• Provide justification to the board and others for decisions and actions;
• Provide broader support and acceptance by sponsors and employees;
• Determine the need for training and professional development.

Components of a CA

At a minimum, the following items should be included as components of a CA:

• Demographic make-up of potentially eligible families including their number, geographic location, and racial/ethnic composition.

• Data specific to poverty and its prevalence related to gender, age, and race/ethnicity for service area. (Organizational Standard 3.2)

• Qualitative and quantitative data on its geographic service area. (Organizational Standard 3.3)

• Other social service agencies in the geographic area and the constituents they serve.

• Data regarding the health, nutrition, and social service needs of the communities as defined by community institutions.

• Availability and accessibility of community resources that can address the needs of eligible families.

• Key findings on the causes and conditions of poverty and the needs of the communities assessed. (Organizational Standard 3.4)

NOTE: The identification of proposed services should be the result of a strategic plan. The CA should support the strategic plan, which is used to formulate the CSBG Plan.

State-Wide Rollup Questions

The following questions should be included in each CA so they can be rolled up into the State-Wide Community Needs Assessment. These can be incorporated into the attached forms if preferred.
COMMUNITY NEEDS ASSESSMENT
Also known as COMMUNITY ASSESSMENT

1. Ask respondents: If you could choose only one service to receive from (insert agency name), what would it be?
2. List services and ask respondents to list the services they would most like to see continued in priority order. Ask them to list their top five services with the most important first.
3. Ask respondents: Is there a service that you need that is not on the list above? If so, please tell us what service(s) you may need.
4. Gather demographics from respondents (County and City/Town) (this is on top of the demographics from the online tool).
5. Ask respondents: Do you have needs/concerns that the agency doesn’t meet? List the following:

Need/Concern:
A Place to Live (currently homeless or living with family/friends)
Adult Foster Care or Assisted Living
Affordable Child Care
Affordable Health Insurance
Affordable Pre-Schools
Affordable Recreation
Affordable Rental Housing
Child Abuse Prevention
Dental Care
Drug or Alcohol Abuse Assistance
Food Assistance
GED or other adult education
Home Health Care
Hospital Services
Job Placement/Better job
Job Training
Legal issues
Medical Services (other than hospital)
Mental Health Services or other Counseling
Mortgage assistance
Nursing Home Care
Nutrition assistance
Parenting classes
Prescription Drug Assistance
Reliable Transportation
Spousal Abuse Assistance
Utility Bill Assistance
Other:
Attachment 1 is included to help CAAs conduct their Community Needs Assessment.

Attachments A-F are included as samples that CAAs may wish to use when conducting their Community Needs Assessment.
Steps in Conducting a CA

The steps outlined below will assist the organization in the process of conducting a CA:

1. **Clarify the purpose of the CA**

The information collected will depend on what type of data is sought about the community. The information gathered must support the Components of the CA listed above.

Responses to the questions below will guide the process.

- What is trying to be measured or what information is to be collected?
- What will be done with the information collected?
- How will the information be reported? Is it user friendly and easy to understand?
- Will the information collected help develop reasonable and appropriate program goals?

Some categories of information to be collected might include the following:

- Historical development of the community
- Geographical and transportation information
- Growth measurement patterns and population distribution
- Demographic data (i.e., age characteristics, race, transience of the population)
- Economic data to identify the community’s economic base
- Social, cultural, educational and recreational organizations in the community

2. **Identify the population**

Determine if information is needed from segments of the entire community or if only particular target groups will participate in the assessment.

Some examples of specific target groups of the community are:

- high school dropouts under age 21 who lack basic computer skills,
- children who are victims of domestic violence who are one or more grade levels behind,
- refugees in a specific county who lack basic computer skills training
- It is important to ensure that the needs & opinions of those experiencing poverty are included.

3. **Determine who will conduct the study**

In determining who will conduct the CA, consider the time frame, the available resources, and the comfort level of staff in performing research.

The CA may be conducted by:

- Outside consultants
- Agency staff
- Volunteers
4. Determine the methodology to collect the information

There are several tools available that can be used to collect data. These include but are not limited to surveys, public forums, focus groups, telephone solicitations, interviews, and pre-existing data.

Customer Service/Public Opinion Surveys

Surveys can either be used to gather information from the community to gauge opinions about key issues.

Particular attention should be paid to the following areas when conducting public opinion surveys.

- The questions being asked
- The target audience from which the information is desired
- The way in which the results will be used
- The scope of the survey
- The issues the survey will address
- The purpose of the survey
- What is to be accomplished

In constructing a survey:

Use short questions which can be answered with checklists, multiple choice, yes-no responses or open-ended answers.

Make sure questions are relevant and written at an appropriate reading level.

Assure that questions are culturally appropriate and/or sensitive.

Agencies should routinely conduct surveys of their operations through customer input.

Public Forums

Public forums are meetings where residents get involved by expressing what their concerns are about community issues and needs.

Public forums are inexpensive methods to get diverse members to share ideas.

To prepare for a successful Public Forum:

- Form a representative steering committee
- Identify issues to form the focus of the forum
- Select a trained facilitator
- Set a time and place
- Publicize the forum through the major media outlets
- Follow-up after the forum with a written report
- The report may be used as the basis for a service plan
**Pre-existing Data**

Pre-existing data can be obtained by researching public records and reports. This data is collected about a particular group without the agency having direct contact with that individual or group. This information can provide insight about emerging trends or issues in a particular community.

- This data already exists
- It is fast and easy to access
- Data is available for most geographic areas

**NOTE:** Pre-Existing or secondary data is NOT ENOUGH in itself. It may be used to supplement primary data – that which is collected first hand from the client, but it is required by Organizational Standard 1.2 that the Organization analyzes information collected directly from low-income individuals as part of the Community Assessment.

The websites listed below are examples of potential resources for gathering data for numerous programs:

- The United States Census Bureau
  [https://www.census.gov/](https://www.census.gov/)

- Community Action Partnership: Community Needs Assessment Online Tool
  [https://www.communitycommons.org/groups/community-action-partnership/](https://www.communitycommons.org/groups/community-action-partnership/)

- Community Commons
  [https://www.communitycommons.org/maps-data/](https://www.communitycommons.org/maps-data/)

**Focus Groups**

A focus group is a way to gather opinions and ideas from a small targeted group of citizens. This is a valuable tool to use to get a consensus of thoughts and ideas rather than to make projections about the community.

- It is easy to conduct
- Provides detailed information
- Allows for issue probing
- Stimulates thinking and discussion
- Particular care should be given in choosing the make-up of a focus group

**Telephone Interviews**

Telephone interviews are an option for vulnerable segments of the population who may not otherwise participate in other methods of data collection.

Questions using a five (5) point scale from strongly agree to strongly disagree can be used to gather input from this population.

- Convenient for persons with disabilities
- Can be used for participants with low literacy levels
- Short time span
• Inexpensive
## Attachment A - Community Needs Survey for Residents

(agency name) would like your input to better serve you.

### City and County where you live: ____________________________

Check one of these choices to let us know who completed the survey:

- [ ] Local Official  [ ] Client  [ ] Volunteer  [ ] Board Member  [ ] Resident  [ ] Other, describe: ____________________________

*Circle the number that reflects your opinion on the need for each item.*

<table>
<thead>
<tr>
<th>CATEGORY</th>
<th>NEEDS</th>
<th>Don’t Know (0)</th>
<th>Not Needed (1)</th>
<th>Rarely Needed (2)</th>
<th>Needed (3)</th>
<th>Very Needed (4)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Assistance</strong></td>
<td>Help with applying for Social Security, SSDI, WIC, TANF, etc.</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Help finding resources in the community</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Finding Child Care</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Food</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Transportation</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Legal Services</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td><strong>Case Management</strong></td>
<td>Assistance with goals and self-sufficiency</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td><strong>Community</strong></td>
<td>Neighborhood clean-up projects</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Crime awareness or crime reduction</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Public parks and facilities</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Employment opportunities</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td><strong>Education</strong></td>
<td>GED classes</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>English as a Second Language Classes</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Adult Education or Night School</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Computer Skills Training</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Assistance to attend trade or technical school, or college</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td><strong>Employment</strong></td>
<td>Help finding a job</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Help with job skills, training &amp; job search</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td><strong>Family Support</strong></td>
<td>Financial Education/Budgeting Classes/Credit Counseling</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Parenting Classes</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Nutrition Education/Healthy Eating Education workshops</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Classes on healthy relationships, resolving conflicts, etc.</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Counseling services</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Programs and Activities for Youth (ages 12-18)</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Programs and Activities for Seniors</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td><strong>Housing</strong></td>
<td>Affordable Housing</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Help paying rent</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Help with utility bills</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Help to make my home more energy efficient (weatherization)</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td><strong>Medical</strong></td>
<td>Health Insurance/ Affordable Medical Care</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Prescription Assistance</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
</tbody>
</table>

*Thank you for taking time to provide us your feedback.*
Attachment B - Client Survey to Evaluate Services

Agency Name: ________________________________

City and County where you live: ________________________________

Age (optional): _____________

Survey Purpose: We need your feedback to help improve our services and plan future services.

1. Please place an X next to the service(s) received from our agency:
   ___ Utility Assistance  ___ Weatherization  ___ Food
   ___ Other Emergency Assistance  ___ Employment Related Assistance  ___ Rent Assistance
   ___ Education Related Assistance  ___ Case Management  ___ Referral
   ___ Other Services – please explain: ________________________________

2. Describe how satisfied you are with the services you received from our agency by circling the rating which best describes your experience:

<table>
<thead>
<tr>
<th>Rating Topics</th>
<th>No Opinion</th>
<th>Poor</th>
<th>Fair</th>
<th>Good</th>
<th>Excellent</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. How did staff treat you?</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td>2. Did staff do what they said they would do to assist you?</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td>3. Did staff assist you in a timely manner?</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td>4. How was your overall service experience?</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
</tbody>
</table>

3. Do you have any recommendations to improve how we serve you?

   ________________________________
   ________________________________
   ________________________________
   ________________________________
   ________________________________
   ________________________________

*Thank you for taking time to provide us your feedback.*
Attachment C - Interview of Elected Officials and Board Members

Name of Elected Official: __________________________ Title of Elected Position: __________________________

City or County Represented: __________________________/ __________________________ Date: ______

____________________________(agency name) is conducting a Community Needs Assessment as part of the requirements to receive Community Services Block Grant funds from the Michigan Bureau of Community Action and Economic Opportunity. As part of the survey, we are interviewing key stakeholders in the community.

1. What do you know about our Community Action Agency and the services we provide that help address needs of low-income persons? (Note: persons that serve on the agency board do not need to answer question #1.)

2. What do you think are the top five key needs of low-income persons in your community? The needs could be in the areas of employment, education, income management, housing, emergency assistance/services, nutrition, helping persons to become self-sufficient, or coordination of services and connecting persons to services, community revitalization, or other needs.

   1)
   2)
   3)
   4)
   5)

3. What suggestions can you provide on how the needs could be addressed?

4. What do you think are some key community revitalization needs?

5. How do you think our community can address the identified community revitalization needs?

6. Do you have any other feedback?
Attachment D - Interview of Organizations

Organization: ___________________________________________ Date of interview: _______
Name of Representative for Organization: _______________________________
City and County Organization is Located: _______________________________

(agency name) is conducting a Community Needs Assessment as part of the requirements to receive Community Services Block Grant funds from the Michigan Bureau of Community Action and Economic Opportunity. As part of the survey, we are interviewing key stakeholders in the community.

1. What do you know about our Community Action Agency and the services we provide that help address needs of low-income persons? (Note: persons that aware of what the agency does, do not need to answer question #1 in the in person interview.)

2. What do think are the top five key needs of low-income persons in the community?
The needs could be in the areas of employment, education, income management, housing, emergency assistance/services, nutrition, helping persons to become self-sufficient, or coordination of services and connecting persons to services, community revitalization, or other needs.

   1) 
   2) 
   3) 
   4) 
   5) 

3. Is your organization currently addressing any of the needs that you identified? If yes, please specify which are being addressed and how?

4. How can our agency partner with your organization to address the needs that you identified?

5. Do you have any other feedback?
Attachment E- Forum Questions for Moderator

Purpose: This community-wide forum is held to obtain your feedback on the needs of low-income persons and to get your suggestions on how our agency and community can better address the needs.

Explanation of Community Needs Assessment: As a requirement of the receipt of Community Services Block Grant funds which are utilized by our organization to provide services such as [LIST SERVICES PROVIDED], we are conducting surveys, interviews, focus groups, and forums to help us identify community needs in key areas such as employment, education, housing, health, emergency assistance, nutrition, transportation, and other areas and to identify barriers and resources.

The format for the Forum: We will pose some questions and open up the floor for persons to raise their hands and provide their input. You can provide your input either from where you are seated or come to the microphone and speak. We will record your input.

Discussion Areas:

1. What are some of the greatest needs that low-income persons face in our community?

2. Of the needs that we have identified, what do you think are the top 5 needs (rank from 1 through 5)?

   1)
   2)
   3)
   4)
   5)

3. What top three community improvements do you think our agency or the community should focus on? The improvements could be in areas such as job creation, affordable housing, accessible and affordable health care, affordable child care, transportation, education or training, community facilities, community services, commercial services, etc.

   1)
   2)
   3)
Attachment F - Focus Group Questions for Moderator

Moderators may use the following steps as guidance when conducting the focus groups.

**Explain the Purpose:** The purpose of our meeting is to obtain feedback from a small group of individuals to have an in-depth discussion of the contributing factors to the top five needs identified in our community.

**Explain the Community Needs Assessment:** As required by the Community Services Block Grant funds from the Michigan Bureau of Community Action and Economic Opportunity, we must conduct a needs assessment to identify and prioritize the needs in the community in key areas such as employment, education, housing, health, and emergency assistance.

**Explain the format for Focus Group:**
1) We will first inform you of the top 5 needs that have been identified through community surveys:

These are:

1. ________________________________  
2. ________________________________  
3. ________________________________  
4. ________________________________  
5. ________________________________

2) We will then ask some questions to identify contributing factors.

**Exercise:** For each need, we will now identify the root causes and barriers contributing to the need. Then we will identify community assets and resources that can address the needs and lastly, identify solutions.

<table>
<thead>
<tr>
<th>Identified Need</th>
<th>Contributing factors</th>
<th>Community Assets/Resources</th>
<th>Solutions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3) Now that we have delved deeper and identified barriers and obstacles, are there any needs that you would add to the list? If yes, which needs?
REFERENCES

- The Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) as amended
- Community Services Block Grant Agreement
- CSPM Item 911 FACSPRO Database CSBG Annual Report

PURPOSE

To provide guidelines and instructions for preparation and submittal of the CAA CSBG Annual Report.

In collaboration with HHS/Office of Community Services (OCS), NASCSP has developed a state reporting mechanism (the CSBG Annual Report) to collect and compile the required information and will present a national report to HHS/OCS. The State has developed a local CAA reporting format which provides the means to collect and compile the reporting elements included in the NASCSP CSBG Annual Report.

POLICY

The CSBG Act, Sec. 678E outlines State Accountability and Reporting Requirements and indicates that:

“Each State shall annually prepare and submit to the Secretary a report on the measured performance of the State and the eligible entities in the State…Each State shall also include in the report an accounting of the expenditure of funds received by the State through the CSBG program, including an accounting of funds spent on administrative costs by the State and the eligible entities, and funds spent by eligible entities on the direct delivery of local services, and shall include information on the number of and characteristics of clients served under this subtitle in the State, based on data collected from the eligible entities.”

CAAs should submit the annual reports using FACSPRO, no later than Thursday, January 31, 2019

Attachment 1: CSBG Annual Report Instructions
REFERENCES
The Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) as amended

PURPOSE
To provide guidelines regarding the CSBG requirement to inform and refer custodial parents to child support services.

The CSBG Reauthorization requires that each eligible entity shall: (1) inform custodial parents in single-parent families that participate in programs, activities or services carried out or provided with CSBG funds about the availability of child support services; and (2) refer eligible parents to the child support offices of State and local governments.

In this regard, the CSBG Agreement states:

The Grantee shall inform and refer custodial parents in single-parent families that participate in programs, activities, or services carried out or provided for with these funds to the child support offices of state and local governments.

POLICY

CAAs shall inform and refer custodial parents who are not receiving child support to local child support offices/services.

To assist CAAs in fulfilling this requirement, DHS can provide copies of the DHS Publication 748, “Understanding Child Support”, for distribution to custodial parents who are not receiving child support. Provision of this booklet to the custodial parent, along with the address of the local DHS Child Support office, and/or the local Prosecuting Attorney’s Office or Friend of the Court, will fulfill the information and referral requirement.

PUBLICATION DHS-748:

Copies of “Understanding Child Support” (English & Spanish version), can be ordered directly from DHS-Office Services Division at no charge by using the attached order form.
<table>
<thead>
<tr>
<th>Community Services Policy Manual</th>
<th>SUBJECT: Community Services Block Grant</th>
<th>EFFECTIVE DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>10.1.14</td>
</tr>
<tr>
<td></td>
<td></td>
<td>ISSUE DATE</td>
</tr>
<tr>
<td></td>
<td></td>
<td>11.5.14</td>
</tr>
</tbody>
</table>

**Note:** Other Office of Child Support publications included on the form are also available at no charge.

Attachment: Office of Child Support - Publication Order List
The following publications are available to the public free of charge. Anyone requesting these publications must complete the “Requester Information” section below, indicate the quantity requested in the shaded area of the table, and send the request to one of the following:

<table>
<thead>
<tr>
<th>Michigan Department of Human Services</th>
<th>Michigan Department of Human Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>Forms &amp; Mail Management</td>
<td>Office of Child Support</td>
</tr>
<tr>
<td>Grand Tower Suite 1207</td>
<td>Grand Tower Suite 801</td>
</tr>
<tr>
<td>PO Box 30037</td>
<td>PO Box 30478</td>
</tr>
<tr>
<td>Lansing, MI 48909</td>
<td>Lansing, MI 48909</td>
</tr>
<tr>
<td>Call: 517-373-7837</td>
<td>Call: 517-373-9202</td>
</tr>
</tbody>
</table>

**Requester Information:**

<table>
<thead>
<tr>
<th>Organization</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
<td></td>
</tr>
<tr>
<td>Mailing Address Line 1</td>
<td></td>
</tr>
<tr>
<td>Mailing Address Line 2</td>
<td></td>
</tr>
<tr>
<td>City, State, Zip</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Order Quantity</th>
<th>Publication Number</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Pub-748-SP</td>
<td>“Understanding Child Support: A Handbook for Parents” (Spanish Version)</td>
</tr>
<tr>
<td></td>
<td>Pub-780</td>
<td>“What Every Parent Should Know About Establishing Paternity”</td>
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<td>Pub-780-SP</td>
<td>“What Every Parent Should Know About Establishing Paternity” (Spanish Version)</td>
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<tr>
<td></td>
<td>Pub-806</td>
<td>“Fatherhood: Taking Responsibility for Your Child”</td>
</tr>
<tr>
<td></td>
<td>Pub-849</td>
<td>“Your Child Has a Right to Know its Father” Establish Paternity POSTER</td>
</tr>
<tr>
<td></td>
<td>Pub 850</td>
<td>“Your Child…Is about to become a parent.”</td>
</tr>
<tr>
<td></td>
<td>Pub 865</td>
<td>“DNA – Paternity Testing Questions and Answers”</td>
</tr>
<tr>
<td></td>
<td>Pub 865-SP</td>
<td>“DNA – Paternity Testing Questions and Answers” (Spanish Version)</td>
</tr>
<tr>
<td></td>
<td>DHS 4821-SP</td>
<td>Spanish Language Worksheet (Affidavit of Parentage form DCH-0682-SP)</td>
</tr>
<tr>
<td></td>
<td>-----</td>
<td>“The Power of Two: Voluntarily Acknowledging Paternity” DVD call 517-373-9202 to order</td>
</tr>
<tr>
<td></td>
<td>-----</td>
<td>“The Power of Two: Voluntarily Acknowledging Paternity” (Spanish Version) DVD call 517-373-9202 to order</td>
</tr>
</tbody>
</table>
**Community Services Policy Manual**

**SUBJECT:** Community Services Block Grant

**UNEXPENDED FUNDS – CARRY-FORWARD POLICY**

| EFFECTIVE DATE | 10/22/15 |
| ISSUE DATE     | 10/22/15 |

**REFERENCES**

- CSBG Information Memorandum #61, Carryover Funds FY2001

**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.

**EXCEPTION**

Federal appropriations acts may contain language that supersedes the language in the CSBG Act and will determine what percentage of CSBG funds will be permitted to carry over into the next fiscal year. The current federal appropriations act allows any unexpended CSBG funds to be carried over into the next fiscal year and to be expended by that same entity.

**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**: DHHS 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.
REFERENCES

- Community Services Block Grant (CSBG) Act – Coats Human Services Reauthorization Act of 1998
- Public Act 268 of 2016 – Michigan Department of Health and Human Services Appropriations for Fiscal Year 2017

PURPOSE

Public Act 268 of 2016 includes fiscal year 2016-2017 appropriations for state departments. Section 686 (3) of the Michigan Department of Health and Human Services budget states that, “The department shall prohibit individuals with property assets assessed at a value higher than $200,000.00 from accessing assistance through department-administered programs, unless such a prohibition would violate federal rules and guidelines.”

POLICY

Grantees will determine their own policies, based on local decisions, of what specific assistance/services will be provided to their clients using CSBG funds. They will also determine the type, financial limitations and frequency of any direct monetary services provided as well as non-income and non-asset related eligibility criteria.

Assets must be considered in determining eligibility for services provided with CSBG funds.

Automatically Asset Eligible

Individuals receiving Family Independence Program (FIP), Food Assistance Program (FAP), State Disability Assistance (SDA), or Supplemental Security Income (SSI) on the application date or were determined eligible for State Emergency Relief (SER) benefits in the previous 30 days from the Michigan Department of Health and Human Services are automatically asset eligible because their asset requirements are met by the FIP/FAP/SDA/SSI programs.

NOTE: Individuals in a household that are not receiving FIP, FAP, SSI, or SDA must be asset tested. Example: Janie and her two children received FAP benefits. They live with Great Aunt Sally who does not receive MDHHS benefits. An asset test must be completed for Great Aunt Sally.

Exception: The entire household is automatically asset eligible if there are individuals in the household who receive SER.

Document the receipt of FIP, FAP, SDA, SSI or SER current benefits and upload document(s) used to verify receipt in the client’s record on FACSPro.
**Household Composition**

Available assets from all household members are considered when determining asset eligibility.

A household is all persons occupying a housing unit, regardless of whether they are related. For “roomers” follow same guidelines as CSPM 502.

**Assets Defined**

Assets are defined as cash, any other personal property and real property. **Real property** is land and objects affixed to the land such as buildings, trees and fences. Condominiums are real property. **Personal property** is any item subject to ownership that is not real property (examples: currency, savings accounts and vehicles).

**Asset Limit**

The asset limit for CSBG specific assistance/services is $200,000.

**Countable Assets**

Certain cash and real property assets are countable against the $200,000 limit. See CASH ASSETS and HOMES AND REAL PROPERTY in this item. Non-cash personal property items (one vehicle, jewelry, etc.) are not countable assets. Exclude one vehicle with the highest fair market value per household.

**Application**

At application, do not authorize CSBG services if the household has countable assets in excess of $200,000 on the application date.

**Ongoing**

For any ongoing services funded by CSBG, recipients must be informed of the requirement to notify the CAA of asset changes resulting in the asset group exceeding the $200,000 available asset threshold. The recipient is no longer eligible for CSBG services from the date the countable assets in excess of $200,000 become available to the household.

**Available**

An asset must be available to be countable. **Available** means that someone in the household has the legal right to use or dispose of the asset.

**Exception:** This does not apply to trusts. There are special rules about trusts. See Trusts below.
Assume an asset is available unless evidence shows it is **not** available.

An asset remains available during periods in which a guardian or conservator is being sought.

Availability might also be affected by joint ownership and efforts to sell or the possibility of domestic violence. See Jointly Owned Assets and Victims of Domestic Violence in this item.

**Asset Determination**

Determine asset eligibility using the household’s assets available at the application date. For ongoing services, the household is no longer eligible for services from the date assets in excess of $200,000 become available to the household.

Asset eligibility exists when the household’s countable assets are less than, or equal to, the applicable asset limit of $200,000.

**Victims of Domestic Violence**

Assets owned by victims of domestic violence may be unavailable due to domestic violence. These assets do **not** have to be jointly owned but accessing them could put the client in danger. You may exempt these assets. Document in the case record the reasons for the exclusion, and, if any document what steps have been taken to secure the asset. Recipients should be advised at the time of the exemption that they are required to report any changes in the status of the asset within 10 days of the change.

**Jointly Owned Assets**

**Jointly owned assets** are assets that have more than one owner.

- A CASH asset is unavailable if an owner **cannot** sell or spend his share of an asset:
  - Without another owner's consent, and
  - The other owner is not in the household, and
  - The other owner refuses consent.

- Jointly owned REAL PROPERTY is only considered unavailable and therefore, only excludable if selling the asset would create a hardship for the other owners.

For jointly owned real property count the individual’s share unless sale of the property would cause undue hardship. Undue hardship for this item is defined as: a co-owner uses the property as his or her principal place of residence **and** they would have to move if the property were sold **and** there is no other readily available housing.

**Exception:** If specified otherwise by the ownership document, each owner's share is the amount specified.
Joint Cash and Retirement Plans

This section applies to the types of assets listed under CASH and RETIREMENT PLANS in this item.

Count the entire amount unless the person claims and verifies a different ownership. Then, each owner's share is the amount he owns.

Other Joint Assets

This applies to all assets that are not included under Cash or Retirement Plans.

Count an equal share for each owner.

CASH ASSETS

Consider only the following types of cash assets:
• Cash (which includes savings and checking accounts).
• Investments.
• Retirement Plans.
• Trusts.

Cash
This section is about the following types of assets:
• Money/currency.
• Un-cashed checks, drafts and warrants.
• Checking and draft accounts.
• Savings and share accounts.
• Money market accounts
• Money held by others-- Example: Sally does not have a bank account. She puts money in her mother's checking account, but it is not a joint account.

Lump Sums and Accumulated Benefits

Lump-sums and accumulated benefits are assets starting the month received.

A person might receive a single payment that includes both accumulated benefits and benefits intended as a payment for the current month. Prorate the lump sum to treat the portion intended for the current month and past two months as income for the 3-month lookback period.

Retroactive SSI Benefits

Retroactive SSI benefits may be paid as a one-time payment or in installments over several months. The Social Security Administration determines how payment will be made.
Retroactive SSI benefits are treated as accumulated benefits (see above) even when paid in installments.

**Value of Cash**

The value of the types of assets described above is the amount of the:

- Money/currency.
- Uncashed check, draft or warrant.
- Money in the account or on deposit.
- Money held by others.

**Cash Exclusions**

**Homestead-Loss Funds Exclusion**

Use this exclusion only if the funds are not commingled with countable assets.

Exclude funds an owner received for repairs or replacement of a damaged or destroyed homestead (example: insurance settlement) if:

- The owner intends to reoccupy the home, and
- There is a written repair/replacement agreement.

Exclude funds for temporary housing while the homestead is being repaired or replaced.

Also see Homestead-Loss Land Exclusion in this item regarding the land the home was on.

**Homestead Sale Exclusion**

Use this exclusion only if the funds are not commingled with countable assets.

Exclude funds received from the sale of a homestead, or the land the home was on, for 12 months if there is a written agreement to purchase another homestead. The 12-month period starts the month the funds are received.

**Non-homestead Loss Exclusion**

Use this exclusion only if the funds are not commingled with countable assets and are not in time deposits.

Exclude funds received for the planned repair or replacement of a non-homestead exempt item (example: furniture, clothing, vehicle) that was lost, stolen or destroyed. Exclude the funds until the item is repaired or replaced.
Loan Exclusion

Use this exclusion only if the funds are not commingled with countable assets.

Exclude funds a person has borrowed provided it is a *bona fide* loan. This includes a loan by oral agreement if it is made a *bona fide* loan. *Bona fide* loan means all of the following are present:

- A loan contract or the lender's written statement clearly indicating the borrower's indebtedness
- An acknowledgment from the borrower of the loan obligation
- The borrower's expressed intent to repay the loan by pledging real or personal property or anticipated income

Reverse Mortgage Exclusion

Use this exclusion only if the funds are not commingled with countable assets.

A reverse mortgage allows a homeowner to borrow some percentage of the value of his home via a mortgage. The homeowner receives periodic payments (or a line of credit) that does not have to be repaid while the homeowner lives in the home. Exclude these payments. They are loans.

Tax Refund and Tax Credit Exclusion

Exclude tax refunds and credits.

Use this exclusion only if the funds are not commingled with countable assets.

Current Income Exclusion

Do not count funds treated as CSBG income as a CSBG asset for the same eligibility determination.

Business Account Exclusion

Use this exclusion only if the funds are not commingled with countable assets.

Exclude a savings, share, checking or draft account used solely for the expenses of a business. Continue the exclusion while the business is not operating provided the person intends to return to the business.
**Student Savings Exclusion**

Use this exclusion only if the funds are not commingled with countable assets.

Exclude funds in a separate account under a student's name and accrued solely from a student's earnings *and the student is a child age 18 and under, and attending school.*

**Investments**

This section is about the following types of assets:

- U.S. Savings bonds.
- Securities such as:
  - Stocks.
  - Bonds.
  - Mutual funds.

**Value of Investments**

The value of a U.S. Savings bond is the amount the owner could get if the bond were cashed-in.

The value of other investments is the amount the asset is selling for:
- Use the closing price for publicly traded stocks.
- Use the bid price or net asset value (NAV) for mutual funds.
- Use the bid price for bonds.

**Retirement Plans**

This section is about the following types of assets:

- Individual retirement accounts (IRAs).
- Keogh plans (also called H.R. 10 plans).
- 401k plans.
- Deferred compensation.
- Pension plans.
- Annuities-- An annuity is a written contract establishing a right to receive specified, periodic payments for life or for a term of years.

**Retirement Plan Value**

The value of these plans is the amount of money the person can currently withdraw from the plan. Deduct any early withdrawal penalty, but not the amount of any taxes due.
Funds in a plan are **not** available if the person must quit his or her job to withdraw any money.

**Trusts**

A **trust** is a right of property created by one person for the benefit of himself or another.

The Probate Court decides availability of the trusts it administers. A grantor must petition the Probate Court to make the principal available.

For other trusts, the principal is an available asset of the person who is legally able to:
- Direct use of the principal for his needs.
- Direct that ownership of the principal revert to himself.

**OTHER CASH ASSETS**

**Individual Development Accounts**

Individual Development Accounts (IDA) are established pursuant to Michigan Public Act 361 of 1998 and section 404(h) of the Social Security Act or Public Law 105-285. IDAs allow low-income families to promote their economic independence by saving for:

- Postsecondary educational expenses.
- First home purchase.
- Business capitalization.

IDAs are funded by periodic contributions from the family’s earnings and matching contributions by or through a nonprofit organization. The IDA must be a trust or a joint account that requires the signatures of both the nonprofit organization and a family member to authorize withdrawals.

An IDA is excluded as an asset.

**Education and Training Exclusion**

529 college savings plans are designed to allow individuals to make after-tax deposits for their children’s future higher education expenses. In Michigan, these plans are administered by the Department of Treasury and are known as Michigan Education Savings Plans. Funds deposited into these accounts may qualify for matching funds. After a child reaches age 18, the funds may be used for post-secondary education or a certified training program.

Disregard funds on deposit in a 529 college savings plan, interest earned on a 529 plan, and any matching funds deposited in a 529 plan.
HOMES AND REAL PROPERTY ASSETS

This section is about the following types of assets:

• Real property.
• Mobile homes.
• Life estates and life leases.

Real Property Definition

Real property is land and objects affixed to the land such as buildings, trees and fences. Condominiums are real property.

Real Property and Mobile Home Value

To determine the fair market value of real property and mobile homes use:

• Deed, mortgage, purchase agreement or contract.
• State Equalized Value (SEV) on current property tax records multiplied by two.
• Statement of real estate agent or financial institution.
• Attorney or court records.
• County records.

The value is the equity value. Equity value is the fair market value minus the amount legally owed in a written lien provision. Liens must be filed with the register of deeds or other appropriate agency. Deeds are considered legal if they are signed and notarized. It does not have to be registered with the registrar of deeds to be a legal document.

Note: In Michigan, a lien on a mobile home is on record with the Secretary of State. If the mobile home is on land the person owns, the lien may also be recorded with the land deed.

Homes and Real Property Exclusions

Employment Property Assets

Exclude employment property assets.

Employment assets are those assets commonly used in a business, a trade or other employment.

Examples:
• Farmland.
• The building a business is located in.
Income-Producing Real Property

Exclude rental and vacation properties such as time-share properties owned by the group if they are renting it to produce income.

EXCLUDED ASSETS

Exclude Native American lands held jointly with the Tribe, or land that can be sold only with the approval of the Department of the Interior’s Bureau of Indian Affairs.

Public Law 93-531, Section 22, 10/17/75 - Relocation assistance payments to members of the Navajo and Hopi tribes.

Public Law 97-403 - Payments to the Turtle Mountain Band of Chippewas and Arizona.

Public Law 97-408 - Payments to the Blackfeet, Grosventre and Assiniboine tribes, Montana, and the Papago, Arizona.

Public Law 98-500, Section 8, 10/17/84, Old Age Assistance Claims Settlement Act, provides that funds made to heirs of deceased Indians under this Act should not be considered as assets.

Public Law 99-146, Section 6(b), 11/11/1985 - Funds distributed per capita or held in trust for members of the Chippewas of Lake Superior. Judgments were awarded in Dockets Numbered 18-S, 18-U, 18-C and 18-T.

Public Law 99-377, Section 4(b), 8/8/86, - Funds distributed per capita to the Chippewas of the Mississippi or held in trust under this Act are excluded. The judgments were awarded in Docket Number 18-S.

Public Law 101-277, 4/30/90, funds appropriated in satisfaction of judgments awarded to the Seminole Indians in Dockets 73,151 and 73-A of the Indian Claims Commission.

Public Law 103-436, 11/02/94, Confederated Tribes of the Colville Reservation Grand Coulee Dam Settlement Act, Section 7(b), pro-vides that payments made pursuant to this Act are totally excluded.

Public Law 111-291, Section 107(f)(2) of the Claims Resolution Act of 2010 - Payments received from the Cobell vs. Salazar Settlement.
VERIFICATION REQUIREMENTS

Do not require verification when countable assets exceed the limit based on a person’s own statement of value.

Verify the value of countable assets at application and when a change is reported.

Verify the factors affecting exclusion of an asset at application and when a change is reported.

Verification Sources

Sources of verification are listed by asset type. The following are examples of acceptable verification sources and not an all-inclusive list.

Checking or Draft Account

Monthly statement (Examination of checkbook is not sufficient.)
Telephone contact with financial institution.

Individual Development Account

Copy of documents establishing the IDA.
Statement from the trustee or custodian of the account.
  • Documentation must specify the purpose for which the trust or account is established, that the trust or account will receive matching funds, and that withdrawals must be authorized by the trustee or custodian.

Loan

Copy of financial institution loan contract.
Lender’s financial statement showing withdrawal of borrowed amount.

Money Held By Other

Written statement from person holding the money.

Retirement Plan

Written statement from plan administrator.
Current plan statement.
Savings or Share Account

Passbook with current entries posted.
Christmas club coupon book.
Written statement from financial institution.
Telephone contact with financial institution.

Savings Certificate

Written statement from financial institution.
Certificate itself.

Stocks and Bonds

Written statement from broker or company.
Listing in current newspaper.

Trust

Copy of trust document.
Copy of documents transferring ownership of assets to the trust.
Appropriate source for the asset types owned by the trust.

U.S. Savings Bond

Statement from financial institution.
Bond itself

Real Property

Deed, mortgage, purchase agreement or contract.
State Equalized Value (SEV) on current property tax records multiplied by two.
Attorney or court records.
County records.
Statement of real estate agent or financial institution.

Vehicles

Blue book or NADA book wholesale (trade-in) value. Do not add the value of optional equipment, special equipment or low mileage when determining value.

Kelly Blue Book at www.kbb.com
Loan statement or payment book.

Statement of vehicle dealer or junk dealer, as appropriate.

**SELF-DECLARATION OF ASSETS**

A notarized self-declaration of assets (written statement signed by the client[s]) may be used to verify value of an asset as a last resort or in situations where the time it would take for the client to obtain the verification would result in a health or safety emergency (for example, lack of heating fuel in cold weather) being left unresolved. Obtain a written statement from the client and document in the case record why no other verification source was available.
ASSET ELIGIBILITY DETERMINATIONS: Does anyone in the household receive the following?

- a) Supplemental Security Income (SSI) ___ Yes ___ No
- b) Family Independence Program (FIP) ___ Yes ___ No
- c) Food Assistance Program (FAP) ___ Yes ___ No
- d) State Disability Assistance (SDA) ___ Yes ___ No
- e) Has the household been determined eligible for State Emergency Relief (SER) within the previous 30 days? ___ Yes ___ No

If the entire household has received any of the MDHHS benefits (share an MDHHS Case) OR includes a member that receives SSI OR has been determined eligible for SER within the previous 30 days, the household is automatically asset eligible. Verify and document receipt of SSI and/or MDHHS FIP/FAP/SDA benefits and no further asset verification is necessary. Individuals who are not included in the MDHHS group, require their own asset eligibility determination. (See CSPM Item 508.)

ASSET DETERMINATION: Indicate the type and value of the following assets owned by the household/individual. For any item marked “yes” indicate what verification was obtained.

<table>
<thead>
<tr>
<th>Cash Assets</th>
<th>Yes</th>
<th>No</th>
<th>Total Countable Value</th>
<th>Verification Obtained</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash (money)</td>
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<tr>
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<td>Money Market Acct.</td>
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<tr>
<td>Money Held by others</td>
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<tr>
<td>U.S. Savings Bonds</td>
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<tr>
<td>Mutual Funds</td>
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<td>Retirement Plan</td>
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<td>Trust</td>
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</table>

<table>
<thead>
<tr>
<th>Real Property &amp; Non-Cash Assets</th>
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<th>No</th>
<th>Total Countable Value</th>
<th>Verification Obtained</th>
</tr>
</thead>
<tbody>
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<tr>
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<tr>
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<tr>
<td>Vehicles (Exclude one vehicle)</td>
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</tbody>
</table>

Total Countable assets: $200,000

If total countable asset value is equal to or less than $200,000, the household is asset eligible.

Agency Representative/Intake Worker: ___________________________ Date: ______________________

To the best of my knowledge, the information given above is accurate and complete.

Signature of applicant: ___________________________ Date: ______________________

Revised 9/2017
REFERENCES

State Emergency Relief Manual 301
The Community Services Block Grant Act (42 U.S.C. 9901 et seq.) as amended

PURPOSE

To provide guidelines for the Deliverable Summer Fuel Program, funded by Community Services Block Grant Discretionary Funding.

POLICY

The Grantee may pre-purchase up to 850 gallons of propane or $1200 in fuel (whichever is less) for Summer fuel eligible households by utilizing a propane.

The Grantee is required to use income that is at or below 125% of the poverty level to determine eligibility for the Summer Fuel Program.

ELIGIBILITY REQUIREMENTS

CSPM 502 Income Eligibility Guidelines and CSPM 508 Asset Eligibility Guidelines must be utilized for eligibility determination.

The primary household heating source must be Propane.

CLIENT FILE

Grantees must maintain a client file for all recipients of CSBG services. All required file documents must be maintained by the agency including uploading documents to FACSPro (See CSPM Item 909).