

## Community Services Block Grant (CSBG) Model State Plan

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

*Public reporting burden for this collection of information is estimated to average 31 hours per response, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information.*

*An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.*

## Section 1 CSBG Administrative Information

1.1. Identify whether this is a one-year or a two-year plan.       One-Year       Two-Year

1.1a. Provide the federal fiscal years this plan covers:      Year One   x   Year Two   x  

**GUIDANCE:** If a state indicates “One-Year” under 1.1., they will only have to provide a response for “Year One”

1.2. **Lead Agency:** Update the following information in relation to the lead agency designated to administer CSBG in the state, as required by Section 676(a) of the CSBG Act. Information should reflect the responses provided in the Application for Federal Assistance, SF-424M.

Has information in regards to the state lead agency changed since the last submission of the state plan?       Yes  No

If yes, provide the date of change and select the fields that have been updated      **[Date Picker and Check all the apply]**

- |   |  |                                     |
|---|--|-------------------------------------|
| <input type="checkbox"/> Lead Agency                    | <input type="checkbox"/> Department Type | <input type="checkbox"/> Office     |
| <input checked="" type="checkbox"/> Authorized Official | <input type="checkbox"/> Street Address  | <input type="checkbox"/> City       |
| <input type="checkbox"/> Zip Code                       | <input type="checkbox"/> Work Number     | <input type="checkbox"/> Fax Number |
| <input type="checkbox"/> Email Address                  | <input type="checkbox"/> Website         |                                     |

1.2a. Lead agency **[Narrative, 150 Characters]**

**GUIDANCE:** This should only include the exact name of the lead agency and an acronym (as applicable).

**EXAMPLE:** Office of Community Services (OCS)

1.2b. Cabinet or administrative department of this lead agency **[Check One and narrative where applicable]**

- Community Affairs Department
- Community Services Department
- Governor’s Office
- Health Department
- Housing Department
- Human Services Department
- Social Services Department
- Other, describe: **[Narrative, 100 characters]**

1.2c. **Cabinet or Administrative Department Name:** Provide the name of the cabinet or administrative department of the CSBG authorized official **[Narrative, 100 Characters]**

1.2d. Authorized official of the lead agency. The authorized official could be the director, secretary, commissioner etc. as assigned in the designation letter

(attached under item 1.3.). The authorized official is the person indicated as authorized representative on the SF-424M. **[Narrative, 50 Characters each]**

Name NANCY VREIBEL Title Deputy Director

- 1.2e. Street Address **[Narrative, 200 characters]**
- 1.2f. City **[Narrative, 50 characters]**
- 1.2g. State **[Dropdown]**
- 1.2h. Zip Code **[Numerical Response, 5 digits]**
- 1.2i. Work Telephone Number and Extension (if applicable) **[Numerical Response, 10 – 15 digits to include extensions]**
- 1.2j. Fax Number **[Numerical Response, 10 digits]**
- 1.2k. Email Address **[Narrative, 150 characters]**
- 1.2l. Lead Agency Website **[Narrative, 200 characters]**

**Note:** Item 1.2. pre-populates the Annual Report, Module 1, Item A.1.

- 1.3. **Designation Letter:** Attach the state’s official CSBG designation letter. A new designation letter is required if the chief executive officer of the state and/or designated agency has changed. **[Attach a document.]**

**GUIDANCE:** The designation letter should be updated whenever there is a change to the designee.

**Instructional Note:** The letter should be from the chief executive officer of the state and include, at minimum, the designated state CSBG lead agency and title of the authorized official of the lead agency who is to administer the CSBG grant award.

- 1.4. **CSBG Point of Contact:** Provide the following information in relation to the designated state CSBG point of contact. The state CSBG point of contact should be the person that will be the main point of contact for CSBG within the state.

Has information regarding to the state point of contact changed since the last submission of the state plan?  Yes  No

If yes, provide the date of change and select the fields that have been updated **[Date Picker and Check all the apply]**

- Agency Name
- Point of Contact
- Street Address
- City
- State
- Zip Code
- Work Number
- Fax Number
- Email Address
- Website

1.4a. Agency Name **BUREAU OF COMMUNITY ACTION AND ECONOMIC OPPORTUNITY**

1.4b. Point of Contact Name

Name Kris Schoenow Title Executive Director

- 1.4c. Street Address [Narrative, 200 characters]
  - 1.4d. City [Narrative, 50 characters]
  - 1.4e. State [Dropdown]
  - 1.4f. Zip Code [Numerical Response, 5 digits]
  - 1.4g. Work Telephone Number [Numerical Response, 10 – 15 digits to include extensions]
  - 1.4h. Fax Number [Numerical Response, 10 digits]
  - 1.4i. Email Address [Narrative, 150 characters]
  - 1.4j. Agency Website [Narrative, 200 characters]
- 1.5. Provide the following information in relation to the State Community Action Association.

**GUIDANCE:** Under this question, please respond yes and provide the information if there is an entity or organization that serves in the capacity of the state community action association that is within your state, whether voluntarily or contractually. If the state community action association is located outside of the state, or if there is a singular entity within the state that serves as the Community Action Association, please answer no to this question.

There is currently a state Community Action Association within the state.  Yes  No  
Has information in regards to the state Community Action Association changed since the last submission of the state plan?  Yes  No

If yes, provide the date of change and select the fields that have been updated. **[Date Picker and Check all the apply]**

- |                                      |   |   |
|--------------------------------------|---|---|
| <input type="checkbox"/> Agency Name | <input type="checkbox"/> Executive Director | <input type="checkbox"/> Street Address |
| <input type="checkbox"/> City        | <input type="checkbox"/> State              | <input type="checkbox"/> Zip Code       |
| <input type="checkbox"/> Work Number | <input type="checkbox"/> Fax Number         | <input type="checkbox"/> Email Address  |
| <input type="checkbox"/> Website     | <input type="checkbox"/> RPIC Lead          |   |

1.5a. Agency name **Michigan Community Action Agency Association**

1.5b. Executive Director or Point of Contact [Narrative, 50 characters each]

Name Kate White Title Executive Director

- 1.5c. Street Address [Narrative, 200 characters]
- 1.5d. City [Narrative, 50 characters]
- 1.5e. State [Dropdown]
- 1.5f. Zip Code [Numerical Response, 5 digits]

- 1.5g.** Telephone Number [**Numerical Response, 10 – 15 digits to include extensions**]
- 1.5h.** Fax Number [**Numerical Response, 10 digits**]
- 1.5i.** Email Address [**Narrative, 150 characters**]
- 1.5j.** State Association Website [**Narrative, 200 characters**]
- 1.5k.** State Association currently serves as the Regional Performance Innovation Consortia (RPIC) lead  Yes  No

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## Section 2 State Legislation and Regulation

- 2.1. **CSBG State Legislation:** State has a statute authorizing CSBG.  Yes  No
- 2.2. **CSBG State Regulation:** State has regulations for CSBG.  Yes  No
- 2.3. **Legislation/Regulation Document:** Attach the legislation and/or regulations or provide a hyperlink(s) to the documents indicated under Items 2.1. and/or Item 2.2.  
[[https://www.michigan.gov/mdhhs/0,5885,7-339-73970\\_5093\\_28508\\_76839---,00.html](https://www.michigan.gov/mdhhs/0,5885,7-339-73970_5093_28508_76839---,00.html)]

**GUIDANCE:** The labeling of all attachments should include the question number for which the document provides supplementary information, the question heading, and the type of document provided. As an example, a state statutory document could be labeled as:

2.3. Legislation/Regulation Document, Washington D.C. Statute

- 2.4. **State Authority:** Select a response for each of the following items about the state statute and/or regulations authorizing CSBG:
- 2.4a. **Authorizing Legislation:** State legislature enacts authorizing legislation or amendments to an existing authorizing statute last federal fiscal year.  Yes  No
- 2.4b. **Regulation Amendments:** State established or amended regulations for CSBG last federal fiscal year.  Yes  No
- 2.4c. **Designation:** State statutory or regulatory authority designates the bureau, division, or office in the state government that is to be the state administering agency.  Yes  No

## Section 3

### State Plan Development and Statewide Goals

**3.1. CSBG Lead Agency Mission and Responsibilities:** Briefly describe the mission and responsibilities of the state agency that serves as the CSBG lead agency.

*The Michigan Department of Health and Human Services provides opportunities, services, and programs that promote a healthy, safe, and stable environment for residents to be self-sufficient.*

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

**GUIDANCE:** States should take into account feedback from OCS, their eligible entities, and the ACSI survey completed by eligible entities when creating their state plan goals.

- *Agencies that have not met 100% of the org standards will show at least a three percent increase towards 100% achievement.*
- *40% of our agencies will have a ROMA Trainer or a ROMA Implementer on staff.*
- *State will develop data driven dashboards to make decisions on improving performance by providing enhanced training and technical assistance.*

**Instructional Note:** For examples of “goals,” see State Accountability Measure 1Sa(i).

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

**3.3. State Plan Development:** Indicate the information and input the state accessed to develop this State Plan.

**3.3.a. Analysis of state-level tools [Check all that applies and narrative where applicable]**

- State Performance Indicators and/or National Performance Indicators (NPIs)
- U.S. Census data
- X State performance management data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)
- X Monitoring Visits/Assessments
- Tools not identified above (specify) **[Narrative, 500 characters]**

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

- X Eligible entity community needs assessments
- X Eligible entity community action plans
- Public Hearings/Workshops
- X Tools not identified above (e.g., state required reports) [specify] **[Narrative, 500 characters]** Conference session for feedback from eligible entities on the state plan.

**3.3.c. Consultation with [Check all that applies and narrative where applicable]**

- X Eligible entities (e.g., meetings, conferences, webinars; not including the

- public hearing)
- X State Association
- National Association for State Community Services Programs (NASCSPP)
- Community Action Partnership (The Partnership)
- Community Action Program Legal Services (CAPLAW)
- CSBG Tribal Training and Technical Assistance (T/TA) provider
- Regional Performance Innovation Consortium (RPIC)
  
- Association for Nationally Certified ROMA Trainers (ANCRT)
- X Federal CSBG Office
- Organizations not identified above (specify) **[Narrative, 500 characters]**

### 3.4. Eligible Entity Involvement

**3.4a.** Describe the specific steps the state took in developing the State Plan to involve the eligible entities. **[Narrative, 3000 Characters]**

*A session was held at the state's CSBG conference specifically to discuss the State Plan with the eligible entities. Their comments were incorporated into the FY19/FY20 State Plan. The CSBG public hearing will be held in Lansing on July 25, 2018 to collect feedback from the CAAs on the state plan development. The state discussed each question of the state plan with the CSBG Advisory Group on several calls and posted all thoughts and comments in the monthly BCAEO Update newsletter. The state also created a Survey Monkey for the CAAs input listing out each question of the state plan. All CAA feedback is incorporated into this state plan.*

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

**3.4b. Performance Management Adjustment:** Describe how the state has adjusted its State Plan development procedures under this State Plan, as compared to previous plans, in order to 1) encourage eligible entity participation and 2) ensure the State Plan reflects input from eligible entities? Any adjustment should be based on the state's analysis of past performance in these areas, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. **[Narrative, 3000 Characters]**

*It was suggested by the CSBG Advisory committee that the state offer a session at the annual CSBG conference to discuss the state plan. This session was offered and many suggestions were made on the questions in the state plan. BCAEO is incorporating those suggestions into this fiscal year state plan. The state discussed each question of the state plan with the CSBG Advisory Group on several calls and posted all thoughts and comments in the monthly BCAEO Update newsletter. The state also created a Survey Monkey for the CAAs input listing out each question of the state plan. All CAA feedback is incorporated into this state plan.*

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

**3.5. Eligible Entity Overall Satisfaction:** Provide the state’s target for eligible entity Overall Satisfaction during the performance period. Year One 76 Year Two 79

**Instructional Note:** The state’s target score will indicate improvement or maintenance of the states’ Overall Satisfaction score from the most recent American Customer Survey Index (ACSI) survey of the state’s eligible entities.

**Note:** Item 3.5 is associated with State Accountability Measure 8S and may pre-populate the state’s annual report form.

**GUIDANCE:** The targets reported here should match the future target set in the Annual Report, Section B, Table B.2.

**GUIDANCE:** Review the [ACSI IM](#) about setting targets for your eligible entity overall satisfaction that are realistic, reasonable, attainable, and possible.

## Section 4

### CSBG Hearing Requirements

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

*The state will hold a public hearing July 25, 2018 to gather input and receive public comment. The draft state plan was sent to all CAAs and the State Association and also made available on the State website, the State Association website, and sent to the GovDelivery subscriber list.*

**GUIDANCE:** Under this question, detail how the state provided the State Plan to the public, including providing sufficient time (ideally no fewer than 30 days) for the public to provide feedback prior to the public hearing. Distribution to the public should include distribution directly to the eligible entities in the state as well as any other interested parties.

- 4.2. Public Notice/Hearing:** Describe how the state ensured there was sufficient time and statewide distribution of notice of the public hearing(s) to allow the public to comment on the State Plan, as required under 676(a)(2)(B) of the CSBG Act. **[Narrative, 2500 Characters]**

*The Notice of Public Hearing was published on the state website in mid June indicating that the FY2019/2020 CSBG State Plan would be available on the MDHHS/BCAEO website in mid July and that written comments could be submitted through August 3, 2018. The notice also indicated that the State Plan is available at CAAs throughout Michigan and posted on the MCAAA.org website. The public hearing will be held on July 25, 2018 from 1:00 pm – 1:30 pm in Lansing, Michigan. Twitter and Facebook was also used to distribute information.*

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

**Instructional Note:** A public hearing is required for each new submission of the State Plan. The date(s) for the public hearing(s) must have occurred in the year prior to the first federal fiscal year covered by this plan. Legislative hearings are held at least every three years, and must have occurred within the last three years prior to the first federal fiscal year covered by this plan.

Date	Location	Type of Hearing <i>[Select an option]</i>	If a Combined Hearing was held confirm that the public was invited.
July 25, 2018 June 12, 2018	Both held in Lansing, Michigan	X Public X Legislative O Combined	<input type="checkbox"/>

**ADD a ROW function Note:** States will be able to add as needed for each additional hearing.

**GUIDANCE:** A combined hearing refers to having one joint public and legislative hearing.

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

The CSBG State public hearing notice can be found at: [https://www.michigan.gov/mdhhs/0,5885,7-339-71551\\_5460\\_41977---,00.html](https://www.michigan.gov/mdhhs/0,5885,7-339-71551_5460_41977---,00.html)

The Senate Bill 848 was passed on 5.15.18: <http://www.legislature.mi.gov/documents/2017-2018/billanalysis/Senate/pdf/2017-SFA-0848-R.pdf>

**GUIDANCE:** Supporting documentation may include, but is not limited to, agendas, sign-in sheets, transcripts, and notices/advertisements of the hearings. All attachments should include the question number, question heading, type of document and the date of the hearing/meeting (as applicable).

**EXAMPLE:** An agenda would be named: 4.4. Public and Legislative Hearings Agenda 062117

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## Section 5 CSBG Eligible Entities

**5.1. CSBG Eligible Entities:** In the table below, indicate whether eligible entity in the state public or private, the type(s) of entity, and the geographical area served by the entity.

CSBG Eligible Entity	Geographical Area Served (by county) [Provide all counties]	Public or Nonprofit	Type of Entity (choose all that apply)
<b>All CAAs will be entered automatically when OLDC goes live.</b>			
[READ-ONLY]	[READ-ONLY]	[READ-ONLY]	<ul style="list-style-type: none"> <li>• Community Action Agency</li> <li>• Limited Purpose Agency</li> <li>• Migrant or Seasonal Farmworker Organization</li> <li>• Tribe or Tribal Organization</li> </ul>
<b>THE ADD-A-ROW FUNCTION WILL NOT BE AVAILABLE ON THIS TABLE. ANY ADDITIONS/DELETIONS TO THE ELIGIBLE ENTITY LIST SHOULD BE MADE WITHIN THE MASTER LIST.</b>			

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

**GUIDANCE:** Under *Type of Entity*, select more than one type by holding down the CTRL key while making selections.

**Note:** Whether nonprofit or public, entities that receive CSBG funds are generally considered to be Community Action Agencies for the purpose of administering CSBG. The only specific exceptions outlined in the CSBG Act are Limited Purpose Agencies, Migrant and Seasonal Farmworker organizations, and Tribes and Tribal Organizations

**Instructional Note: Limited Purpose Agency** refers to an eligible entity that was designated as a limited purpose agency under Title II of the Economic Opportunity Act of 1964 for fiscal year 1981, that served the general purposes of a community action agency under Title II of the Economic Opportunity Act, that did not lose its designation as a limited purpose agency under Title II of the Economic Opportunity Act as a result of failure to comply with that Act and that has not lost its designation as an eligible entity under the CSBG Act.

**Instructional Note: 90 percent funds** are the funds a state provides to eligible entities to carry out the purposes of the CSBG Act, as described under Section 675C of the CSBG Act. A state must provide “no less than 90 percent” of their CSBG allocation, under Section 675B, to the eligible entities.

**5.2. Total number of CSBG eligible entities:** 29 **[This will automatically update based on Table 5.1.]**

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

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

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

**GUIDANCE:** The following three questions will only need to be answered based on your response to 5.3.

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

CSBG Eligible Entity	Type	Start Date	Geographical Area Served
[Narrative, 150 characters]	[Dropdown: <ul style="list-style-type: none"> <li>• Designation</li> <li>• Re-Designation]</li> </ul>	[Date Picker]	[Narrative, 550 characters]
<b>ADD-A-ROW FUNCTION.</b> Note: States will be able to add a row as needed.			

**GUIDANCE:** A designation refers to an entity that was not receiving funding in the previous federal fiscal year(s) and/or was not included in the previous CSBG State Plan. Re-designation implies that an entity that is already designated/receiving funds is now performing the duties and receiving funds that were previously designated to another entity, in addition to the funding that they are already receiving. This is different from a merger as an entity is not absorbing another entity. This re-designation may be permanent (**requires a formula redistribution**) or temporary while the state has officially designated a new entity and has completed a formula redistribution. See CSBG Act 676A, *Designation and Redesignation...*, for more information.

**5.3b. De-Designations and Voluntary Relinquishments:** Identify any entities that are no longer receiving CSBG funding. Include any eligible entities that have been terminated (de-designated) as defined under Section 676(c) and Section 676C of the Act, or voluntarily relinquished their CSBG eligible entity status since the last federal fiscal year.

CSBG Eligible Entity	Reason
[Narrative, 150 characters]	[Dropdown: <ul style="list-style-type: none"> <li>• Termination/De-designation</li> <li>• Voluntary Relinquished]</li> </ul>
<b>ADD-A-ROW FUNCTION.</b> Note: States will be able to add a row as needed.	

**5.3c. Mergers:** In the table below, provide information about any mergers or other combinations of two or more eligible entities that were each listed in the prior year state plan.

Original CSBG Eligible Entities	Surviving CSBG Eligible Entity	New Name (as applicable)	DUNS No.
[Narrative, 500 characters]  <i>List and number all entities involved.</i>	[Narrative, 150 characters]	[Narrative, 150 characters]	[Narrative, 150 characters]
<b>ADD-A-ROW FUNCTION.</b> Note: States will be able to add a row as needed.			

**GUIDANCE:** In the case that an organization that was not previously a CSBG eligible entity, merges with a previously existing CSBG eligible entity, and is the surviving entity, the new entity should be listed under 5.3a. as a new designation, while the previously funded CSBG eligible entity should be included under 5.3b.

## Section 6 Organizational Standards for Eligible Entities

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

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

- COE CSBG Organizational Standards
- Modified version of COE CSBG Organizational Standards
- Alternative set of organizational standards

**Note:** Item 6.1. pre-populates the Annual Report, Module 1, Item D.1.

**6.1a. Modified Organizational Standards:** In the case that the state is requesting to use modified COE-developed organizational standards, provide the proposed modification for the FFY of this planning period including the rationale. **[Narrative, 2500 characters]**

**6.1b. Alternative Organizational Standards:** If using an alternative set of organizational standards, attach the complete list of alternative organizational standards. **[Attachment (as applicable)]**

**6.1 c. Alternative Organizational Standards:** If using an alternative set of organizational standards: 1) provide any changes from the last set provided during the previous State Plan submission; 2) describe the reasons for using alternative standards; and 3) describe how they are at least as rigorous as the COE- developed standards.

- There were no changes from the previous State Plan submission **[Narrative, 2500 characters if not selected]**

Provide reason for using alternative standards **[Narrative, 2500 characters]**

Describe rigor compared to COE-developed Standards **[Narrative, 2500 characters]**

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

- Regulation
- Policy
- Contracts with eligible entities
- Other, describe: **[Narrative, 5000 characters]**

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

- Peer-to-peer review (with validation by the state or state-authorized third party)
- Self-assessment (with validation by the state or state-authorized third party)
- Self-assessment/peer review with state risk analysis
- State-authorized third party validation
- Regular, on-site CSBG monitoring
- Other

**6.3 a. Assessment Process:** Describe the planned assessment process. **[Narrative, 5000 characters]**

*In FY2018, the state conducted an assessment of the organizational standards through both onsite and desk review monitorings. Each grant manager conducted five to six organizational standards reviews by using an electronic automated tool. Assessment Steps: 1. BCAEO notified the agency about the organizational standards review 2. Agency received instructions on uploading documents by Org Standard into the statewide database. 3. BCAEO conducted an entrance conference to provide the agency with the scope of the review. 4. BCAEO reviewed each document for the components listed in the organizational standards monitoring tool to ensure the organization standard has been met. a.) Met standards were marked met b.)Standards that have not been met and do not contain the required components were marked not met. c.) Standards that are being worked were marked in-progress in the monitors field notes d.) Notes are stored in the custom database. 5. Standards that were met were identified in the monitoring report. 6. Standards that are not met were indicated in the monitoring report. A Corrective Action Plan (CAP) will be required. Agencies that cannot correct the finding within 30 days will be placed on a Technical Assistance Plan. Failure to comply with the TAP will require additional monitoring to determine the causes of the failure. This may lead to a Quality Improvement Plan. 7. Standards that are in-progress will be identified in the monitoring report as not met.*

**GUIDANCE:** Descriptions should also include improvements to the process made since the previous year including any new processes to increase efficiency or consistency of assessments.

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

**GUIDANCE:** The following question will only need to be answered based on your response to 6.4.

**6.4 a.** Provide the specific eligible entities the state will exempt from meeting organizational standards, and provide a description and a justification for each exemption. Total Number of Exempt Entities: **[Auto – calculated]**

CSBG Eligible Entity	Exemption Provided	Description/Justification
[Narrative, 150 characters]	[Select Yes or No]	[If Yes is selected, provide a narrative, 2500 characters]
<b>ADD a ROW function</b> Note: Rows will be able to be added for each additional exception.		

**6.5. Performance Target:** Provide the percentage of eligible entities that the state expects to meet all the state-adopted organizational standards for the FFY(s) of this planning period. **[Insert a percentage]** **Year One** 90% **Year Two** 90%

**Note:** Item 6.5. is associated with State Accountability Measures 6Sa and pre-populate the Annual Report, Module 1, Table D.2.

**GUIDANCE:** Prior to setting the target, states should review [IM 138](#), review previous performance, and collaborate with the eligible entities and state association in identifying targets.

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## SECTION 7 State Use of Funds

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

**7.1. Formula:** Select the method (formula) that best describes the current practice for allocating CSBG funds to eligible entities. **[Check one and narrative where applicable]**

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

**7.1a. Formula Description:** Describe the current practice for allocating CSBG funds to eligible entities. **[Narrative, 5000 characters]**

*Each year, the allocation amount is put into a table with different measures. It starts with a base:*

- Each CAA receives a base amount of \$25,000.
- 84% of the formula is based on proportions of persons with incomes below 125% of poverty.
- 10% of the formula is based on proportions of persons in excess of poverty.
- 6% of the formula is based on proportions of persons in extreme poverty.

**7.1b. Statute:** Does a state statutory or regulatory authority specify the formula for allocating “not less than 90 percent” funds among eligible entities?

- Yes  No

**7.2. Planned Allocation:** Specify the percentage of your CSBG planned allocation that will be funded to eligible entities and “not less than 90 percent funds” as described under Section 675C(a) of the CSBG Act. In the table, provide the planned allocation for each eligible entity receiving funds for the fiscal year(s) covered by this plan.

Year One 90 % Year Two 90 %

Planned CSBG 90 Percent Funds – Year One	
CSBG Eligible Entity	Funding Amount \$
Pre-populates from the CSBG Eligible Entity Master List when OLDC goes live	Enter the dollar amount for each eligible entity for the first FFY covered by this plan
<b>Total</b>	Auto-calculated

Planned CSBG 90 Percent Funds – Year Two	
CSBG Eligible Entity	Funding Amount \$
Pre-populates from the CSBG Eligible Entity Master List	Enter the dollar amount for each eligible entity for the second FFY covered by this plan
<b>Total</b>	Auto-calculated

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

**7.3. Distribution Process:** Describe the specific steps in the state's process for distributing 90 percent funds to the eligible entities and include the number of days each step is expected to take; include information about state legislative approval or other types of administrative approval (such as approval by a board or commission). **[Narrative, 5000 characters]**

*All eligible entities (CAAs) requesting CSBG funds submit a Community Action Plan (CAP) in the format prescribed by the state (usually due within six weeks of receiving the request from MDHHS). Once the CAA submits their CAP, the BCAEO approves it and submits it to our Contracts area within MDHHS. Once the Contracts unit approves it (14 days), it is sent up to MDHHS Executive Administration for final approval (14 days). Planning allocation amounts, program requirements, plan criteria, and other pertinent data are distributed annually (prior to October 1) as a CSBG item update in the MDHHS Community Services Policy Manual (See attached CSPM 301). 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 "planned" allocation chart. The CAAs amend their plans during the second quarter of the year based on final allocations; This process is completed within 30 days from the date the amended plan package is sent to the agencies. 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' CAPs. 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. 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).*

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

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

*BCAEO provides funding authorization prior to OCS federal award distribution by awarding the full planning allocation to each CAA. Payments are made using actual cost reimbursement on a monthly basis. Once the CAPs are received and approved by BCAEO, they must be sent to the MDHHS Contract Division for further approval. Once approved in the Contract Division, the plans are sent to the MDHHS executive office for signature. After signature, the plans are sent back to the Contract Division, logged in to their system and sent back to BCAEO for distribution to the CAAs. This process can take up to four weeks; sometimes longer. Funds are available once the approved plans and approved planning budgets are sent to the CAAs prior to the October 1 start date unless the CAAs original submission is not timely. Adjustments are made once the final federal allocation is awarded.*

**Note:** Item 7.4 is associated with State Accountability Measure 2Sa and may pre-

populate the state's annual report form.

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

*The state held a CSBG conference and collected feedback from the eligible entities during one of the sessions. The state improved contract administration procedures this year by continuously streamlining required documents from the eligible entities, providing webinars and training on plan instructions prior to submission, meeting with the CSBG Advisory Committee and updating the Community Action Plan to incorporate their suggestions. The state was moving to a new accounting and contract structure, but instead of being forced to rush into a new contract in an unfamiliar accounting system, the state requested and was allowed another extension year in our current CSBG contract to give us time to incorporate any needed changes.*

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

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

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

Year One 5%      Year Two 5%      [Numeric response, specify %]

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

- 7.7. State Staff:** Provide the number of state staff positions to be funded in whole or in part with CSBG funds for the FFY(s) covered by this State Plan.

Year One 17      Year Two 17      [Numeric response, 0.00 – 99.99]

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

Year One 9      Year Two 9      [Numeric response, 0.00 – 99.99]

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

- 7.9. Remainder/Discretionary Funds Use:** Does the state have remainder/discretionary funds, as described in Section 675C(b) of the CSBG Act?      X Yes    O No

**GUIDANCE:** "No" should only be selected if the percentages provided under 7.2. and 7.6. equal to 100%.

If yes, provide the allocated percentage and describe the use of the remainder/discretionary funds in the table below. Year One 5%    Year Two 5%

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

**Instructional Note:** The assurance under 676(b)(2) of the Act (Item 14.2 of this State Plan) specifically requires a description of how the state intends to use remainder/discretionary funds to "support innovative community and neighborhood-

based initiatives related to the purposes of [the CSBG Act].” Include this description in Item 7.9f of the table below and/or attach the information.

If a funded activity fits under more than one category in the table, allocate the funds among the categories. For example, if the state provides funds under a contract with the State Community Action association to provide training and technical assistance to eligible entities and to create a statewide data system, the funds for that contract should be allocated appropriately between Items 7.9a. – 7.9c. If allocation is not possible, the state may allocate the funds to the main category with which the activity is associated.

**Note:** This information is associated with State Accountability Measures 3Sa and pre-populates the Annual Report, Module 1, Table E.7.

<b>Use of Remainder/Discretionary Funds – Year One</b>		
<b>Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)</b>	<b>Planned \$</b>	<b>Brief Description of Services and/or Activities</b>
7.9a. Training/technical assistance to eligible entities	\$225,000	These planned services/activities will be described in State Plan Item 8.1 <b>[Read Only]</b>
7.9b. Coordination of State-operated programs and/or local programs	\$130,000	These planned services/activities will be described in State Plan Section 9, State Linkages and Communication <b>[Read Only]</b>
7.9c. Statewide coordination and communication among eligible entities	\$1032	These planned services/activities will be described in State Plan Section 9, State Linkages and Communication <b>[Read Only]</b>
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need	\$251,555	<b>Raise the minimum level of funding to \$175,000 for smaller agencies.</b>
7.9e. Asset-building programs	\$200,000	<b>Discretionary RFP</b>
7.9f. Innovation programs/activities by eligible entities or other neighborhood group	\$211,210	Describe here. <b>Discretionary RFP</b>
7.9g. State charity tax credits	\$0	<b>[Narrative, 5000 characters]</b>
7.9h. Other activities [Specify under Column 4]	\$89,000	Specify the other activities funded through discretionary funds here. <b>Native American Agreements</b>
<b>Totals</b>	<b>\$1,307,797</b>	

<b>Use of Remainder/Discretionary Funds – Year Two (as applicable)</b>		
<b>Remainder/Discretionary Fund Uses</b> (See 675C(b)(1) of the CSBG Act)	<b>Planned \$</b>	<b>Brief Description of Services and/or Activities</b>
7.9a. Training/technical assistance to eligible entities	\$225,000	These planned services/activities will be described in State Plan Item 8.1 <b>[Read Only]</b>
7.9b. Coordination of State-operated programs and/or local programs	\$130,000	These planned services/activities will be described in State Plan section 9, State Linkages and Communication <b>[Read Only]</b>
7.9c. Statewide coordination and communication among eligible entities	\$1032	These planned services/activities will be described in State Plan section 9, State Linkages and Communication <b>[Read Only]</b>
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need	\$251,555	<b>Raise the minimum level of funding to \$175,000 for smaller agencies.</b>
7.9e. Asset-building programs	\$200,000	<b>Discretionary RFP</b>
7.9f. Innovation programs/activities by eligible entities or other neighborhood group	\$211,210	Describe here. <b>Discretionary RFP</b>
7.9g. State charity tax credits	\$0	<b>[Narrative, 5000 characters]</b>
7.9h. Other activities [Specify under Column 4]	\$89,000	Specify the other activities funded through discretionary funds here. <b>Native American Agreements</b>
<b>Totals</b>	<b>\$1,307,797</b>	

**GUIDANCE:** If the percentages provided under 7.2. and 7.6. do not equal 100%, the remaining percentage should be reported under 7.9. If the state does not have any remainder/discretionary fund activities (as listed in 7.9a. – 7.9g.), the remainder should be described in 7.9h.

**7.10. Remainder/Discretionary Funds Partnerships:** Select the types of organizations, if any, the state plans to work with (by grant or contract using remainder/discretionary funds) to carry out some or all of the activities in Table 7.9. **[Check all that apply and narrative where applicable]**

- The state directly carries out all activities (No Partnerships)
- The state does not have remainder/discretionary funds
- The state partially carries out some activities
- CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds) **[Numeric response, 0 – 100]**
- Other community-based organizations
- State Community Action association
- Regional CSBG technical assistance provider(s)
- National technical assistance provider(s)
- Individual consultant(s)
- Tribes and Tribal Organizations
- Other **[Narrative, 2500 characters]**

**Note:** This response will link to the corresponding CSBG assurance in Item 14.2.

- 7.11. Performance Management Adjustment:** Describe any adjustments the state will make to the use of remainder/discretionary funds under this State Plan as compared to past plans? Any adjustment should be based on the state’s analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

*The state gathered volunteers for a CSBG advisory committee and held a conference session to gain feedback on how discretionary funds should be used. Funds are also being set aside for improvement of the statewide database and training dollars for the combined conference with the state association.*

**Note:** This information is associated with State Accountability Measures 3Sb, and may pre-populate the state’s annual report form.

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## SECTION 8

### State Training and Technical Assistance

**8.1. Training and Technical Assistance Plan:** Describe the state’s plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan by completing the table below. Add a row for each activity: indicate the timeframe; whether it is training, technical assistance or both; and the topic. (CSBG funding used for this activity is referenced under item 7.9a., Use of Remainder/Discretionary Funds.)

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

**GUIDANCE:** Table 8.1. should only include the trainings that are being paid for using state discretionary training and technical assistance funds as noted under 7.9a.

**This will populate when OLDC goes live**

<b>Training and Technical Assistance – Year One</b>			
Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
<p><b>Dropdown Options:</b></p> <ul style="list-style-type: none"> <li>FY1 Q1</li> <li>FY1 Q2</li> <li>FY1 Q3</li> <li>FY1 Q4</li> <li>Ongoing/Multiple Quarters</li> <li>All quarters</li> </ul> <p>[Select one dropdown per row]</p>	<p><b>Toggle Options:</b></p> <ul style="list-style-type: none"> <li>Training</li> <li>Technical Assistance</li> <li>Both</li> </ul> <p>[Select one dropdown per row]</p>	<p><b>Dropdown Options:</b></p> <ul style="list-style-type: none"> <li>Fiscal</li> <li>Governance/Tripartite Boards</li> <li>Organizational Standards – General</li> <li>Organizational Standards – for eligible entities with unmet TAPs or QIPs</li> <li>Correcting Significant Deficiencies Among Eligible Entities</li> <li>Reporting</li> <li>ROMA</li> <li>Community Assessment</li> <li>Strategic Planning</li> <li>Monitoring</li> <li>Communication</li> <li>Technology</li> <li>Other</li> </ul> <p>[Select one dropdown per row]</p>	<p>If other is selected in column 3, describe in this column</p> <p>[Narrative, 500 characters]</p>
<p><b>ADD A ROW function</b> Note: Rows will be able to be added for each additional training</p>			



Section 678C(a)(4) of the CSBG Act. If the state, according to their corrective action procedures, does not plan to put a QIP in place for an eligible entity with one or more unmet organizational standards, the state should put a TAP in place to support the entity in meeting the standard(s).

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

*When agencies have unmet standards, they are placed on a TAP and are expected to meet the unmet standards before the end of the fiscal year. MCA is copied on the TAP letters to ensure they provide any needed training and technical assistance.*

**8.3. Training and Technical Assistance Organizations:** Indicate the types of organizations through which the state plans to provide training and/or technical assistance as described in Item 8.1, and briefly describe their involvement. (Check all that apply.)  
**[Check all that applies and narrative where applicable]**

CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds) **[Numeric response, 0 – 100]**

Other community-based organizations

State Community Action Association

Regional CSBG technical assistance provider(s)

National technical assistance provider(s)

Individual consultant(s)

Tribes and Tribal Organizations

Other **[Narrative, 1000 characters]**

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

*The state held a CSBG conference and collected feedback from the eligible entities during one of the sessions, on the state plan, this question in particular. The state is making adjustments on T/TA by listening to CAA feedback and making more training options available. The state's Risk Assessment (called the STAR rating; State Technical Assessment Report) lists possible training opportunities. The state association has been included in all Technical Assistance Plans sent to the agencies so they can provide the needed trainings. It was also requested that the state and the state association combine conferences into one week. This took place in July 2018 and was very successful.*

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

## SECTION 9

### State Linkages and Communication

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

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

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

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

*The state office is the pass-through entity for LIHEAP and Weatherization funds to the CAAs. The state is also a part of the governor's task force that is headed up by the Michigan State Housing Development Authority (MSHDA). MSHDA and the state work together on lead abatement to avoid duplication of services. There is money set aside in the state budget for our School Success program, which is administered by BCAEO and funded through by TANF.*

*The state has been meeting with our TANF office to talk about how our work fits in with TANF funding and how to increase access to CSBG services for low-income communities and clients. The Bureau Director has just been added to the State WIOA Infrastructure Work Group.*

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

*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 one to eleven 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 and to avoid duplication of services. The CAAs actively participate in local networking and planning organizations, including multi-purpose collaborative bodies, human service coordinating bodies, continua of care, and workforce development boards. 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. This question is also asked in their Community Action Plans.*

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

### **9.3. Eligible Entity Linkages and Coordination**

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

*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 percent 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, and The United Way. One agency mainstreamed the application of Head Start and GSRP so there is one pre-application. This allows CAA eligible families to be referred to the most appropriate program for their needs. The state assures this through Monitorings and reviewing the agency's CAP.*

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

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

*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.*

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

**9.4. Workforce Innovation and Opportunity Act (WIOA) Employment and Training**

**Activities:** Does the state intend to include CSBG employment and training activities as part of a WIOA Combined State Plan, as allowed under the Workforce Innovation and Opportunity Act (as required by the assurance under Section 676(b)(5) of the CSBG Act)?

Yes  No

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

**9.4a. WIOA Combined Plan:** If the state selected yes under Item 9.4, provide the CSBG-specific information included in the state's WIOA Combined Plan. This information includes a description of how the state and the eligible entities will coordinate the provision of employment and training activities through statewide and local WIOA workforce development systems. This information may also include examples of innovative employment and training programs and activities conducted by community action agencies or other neighborhood-based organizations as part of a community antipoverty strategy. **[Narrative, 5000 Characters]**

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

*In Michigan, federal workforce development programs are administered by the Department of Talent and Economic Development and workforce development services are administered locally through 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. Several 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 Innovation and Opportunity Act.*

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

*The BCAEO usually partners with the LIHEAP office to provide energy assistance for low-income clients in an energy crisis. For FY19, the LIHEAP office has decided to keep the emergency services within MDHHS. CAAs will act as referral partners. BCAEO will bid out for dollars to pass through to the CAAs to become MiBridges partners to help clients set up affordable payment plans.*

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

- 9.6. Faith-based Organizations, Charitable Groups, Community Organizations:** Describe how the state will assure local eligible entities will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations, according to the state's assurance under Section 676(b)(9) of the CSBG Act.

*The annual CAP requires CAAs to explain how they will coordinate funds by collaborating and partnering with other organizations. These partners (public and private) are then required to be entered into our statewide database for review. BCAEO reviews this information annually.*

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

- 9.7. Coordination of Eligible Entity 90 Percent Funds with Public/Private Resources:** Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act.

*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, 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, and volunteers. They are required to list all partners in the statewide database.*

*Examples of public resources include: hospitals and health care providers; law-enforcement and courts; schools and juvenile offices; local MDHHS 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.*

*Through the CSBG Advisory Committee, it was suggested that the CAP plan ask for clear examples of how the CAAs are using CSBG dollars to leverage other funding sources. This question was been added to the CAP starting in FY18.*

**Note:** This response will link to the corresponding assurance, Item 14.3c.

- 9.8. Coordination among Eligible Entities and State Community Action Association:** Describe state activities for supporting coordination among the eligible entities and the State Community Action Association.



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

*The state sought input and made changes based on that input from the CSBG Advisory group, resulting in a more effective Communication plan using technology with monthly newsletter (BCAEO Update). The Update makes front line staff feel more connected. It was suggested that maybe the state could archive it on the BCAEO website, so we have created an external SharePoint and are working on getting that set up. It was suggested that face to face communication is sometimes preferred over a webinar because the attendees may be more comfortable asking questions, so more training sessions were made available at the CSBG conference. BCAEO has utilized FACSPro documents center to share ideas/instructions to improve processes, suggested forms - New documents in FACSPro are now flagged.*

**Note:** This information is associated with State Accountability Measure 5S(iii) and will pre-populate the Annual Report, Module 1, Item G.6.

**GUIDANCE:** Under this question, include how the state will provide information to local entities and state associations within 60 days of receiving feedback from OCS.

**9.11. Performance Management Adjustment:** Describe any adjustments the state made to the Communication Plan in this State Plan as compared to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. **[Narrative, 5000 Characters]**

*The state is working on an external SharePoint site where agencies can find information we post and share. We learned that our monthly newsletter is very informative and CAAs want us to start archiving them. The state also hired a Communication staff member to work on a communication plan.*

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

## SECTION 10

### Monitoring, Corrective Action, and Fiscal Controls

#### Monitoring of Eligible Entities (Section 678B(a) of the CSBG Act)

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

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

**This will be updated when OLDC goes live.**

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

**GUIDANCE:** Monitoring that is specific to organizational standards should be referenced within Section 6, Item 6.3a.

<b>Monitoring Schedule – Year One</b>						
CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of “Other”
Narrative, 150 characters	<b>[Dropdown Options:</b> <ul style="list-style-type: none"> <li>• Full On-Site</li> <li>• Newly Designated</li> <li>• Follow-up</li> <li>• Other</li> <li>• No Review]</li> </ul>	<b>[Dropdown Options:</b> <ul style="list-style-type: none"> <li>• Onsite Review</li> <li>• Desk Review]</li> </ul>	<b>[Dropdown Options:</b> <ul style="list-style-type: none"> <li>• FY1 Q1</li> <li>• FY1 Q2</li> <li>• FY1 Q3</li> <li>• FY1 Q4]</li> </ul>	Select a Date	Select a Date	If “Other” is selected in Column 2, describe in this column  <b>[Narrative, 500 characters]</b>

Monitoring Schedule – Year Two						
CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of “Other”
This column will auto-populate from the CSBG Eligible Entity Master List	<b>[Dropdown Options:</b> <ul style="list-style-type: none"> <li>• Full On-Site</li> <li>• Newly Designated</li> <li>• Follow-up</li> <li>• Other</li> <li>• No Review]</li> </ul>	<b>[Dropdown Options:</b> <ul style="list-style-type: none"> <li>• Onsite Review</li> <li>• Desk Review]</li> </ul>	<b>[Dropdown Options:</b> <ul style="list-style-type: none"> <li>• FY2 Q1</li> <li>• FY2 Q2</li> <li>• FY2 Q3</li> <li>• FY2 Q4]</li> </ul>	Select a Date	Select a Date	If “Other” is selected in Column 2, describe in this column  <b>[Narrative, 500 characters]</b>

**GUIDANCE:** Comprehensive training is one that includes a review of program, administrative, fiscal and organizational standards.

If you are monitoring an entity as a follow up to an issue with another program this can be listed under “Other.”

When providing the date of your last full onsite review – this could be for any type of review that took place onsite. No dates for desk reviews should be provided here.

**10.2. Monitoring Policies:** Provide a copy of state monitoring policies and procedures by attaching and/or providing a hyperlink. [www.michigan.gov/bcaeo](http://www.michigan.gov/bcaeo).

**10.3. Initial Monitoring Reports:** According to the state’s procedures, by how many calendar days must the state disseminate initial monitoring reports to local entities? **60**

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

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

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

**10.4a. Closing Findings Procedures:** If no, describe state procedures for addressing eligible entity findings/deficiencies, and the documenting closure of findings.  
**[Narrative, 2500 characters]**

**10.5. Quality Improvement Plans (QIPs):** Provide the number of eligible entities currently on QIPs, if applicable. **1**

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

**10.6. Reporting of QIPs:** Describe the state’s process for reporting eligible entities on QIPs to

the Office of Community Services within 30 calendar days of the state approving a QIP?

*BCAEO will send communication to the Office of Community Services within 30 calendar days after approving a QIP from an agency that has been listed as high risk with serious deficiencies. Michigan has an agency that has been placed on a QIP per a monitoring letter from BCAEO. Due to some higher level staffing changes and also to give time to complete the single audit, the previous QIP deadline was extended through September 30, 2018. BCAEO did notify OCS regarding this matter with a formal letter.*

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

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

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

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

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

**10.8a. New Designation Citation:** If yes, provide the citation(s) of the law and/or regulation. **[Narrative, 2500 Characters]**

**10.8 b. New Designation Procedures:** If no, describe state procedures for the designation of new eligible entities and how the procedures were made available to eligible entities and the public. **[Narrative, 5000 Characters]**

- 10.9. Eligible Entity Termination:** Do state CSBG statute and/or regulations provide for termination of eligible entities?  Yes  No

**10.9 a. Termination Citation:** If yes, provide the citation(s) of the law and/or regulation. **[Narrative, 2500 characters]**

**10.9 b. Termination Procedures:** If no, describe state procedures for termination of new eligible entities and how the procedures were made available to eligible entities and the public. **[Narrative, 5000 characters]**

- 10.10. Eligible Entity Re-Designation:** Do the state CSBG statute and/or regulations provide for re-designation of an existing eligible entity?  Yes  No

**10.10 a. Re-Designation Citation:** If yes, provide the citation(s) of the law and/or regulation. *Will follow same regulation as designating an entity. State Administrative Rules and Community Services Policy Manual. [www.michigan.gov/bcaeo](http://www.michigan.gov/bcaeo)*

**10.10b. Re-Designation Procedures:** If no, describe state procedures for re-designation of existing eligible entities and how the procedures were made available to eligible entities and the public. **[Narrative, 5000 Characters]**

**GUIDANCE:** Re-designation implies that an entity that is already designated/receiving funds is now performing the duties and receiving funds that were previously designated to another entity, in addition to the funding that they are already receiving. This is different from a merger as an entity is not absorbing another entity. This re-designation may be permanent (**requires a formula redistribution**) or temporary while the state has officially designated a new entity and has completed a formula redistribution. See CSBG Act 676A, *Designation and Redesignation...*, for more information.

### **Fiscal Controls and Audits and Cooperation Assurance**

**10.11. Fiscal Controls and Accounting:** Describe how the state’s fiscal controls and accounting procedures will a) permit preparation of the SF-425 Federal fiscal reports (FFR) and b) permit the tracing of expenditures adequate to ensure funds have been used appropriately under the block grant, as required by Block Grant regulations applicable to CSBG at 45 CFR 96.30(a).

A. The Federal Reporting Section in MDHHS uses the State's Accounting system (previously MAIN but transitioning to SIGMA in FY18) and the information database (Desktop Intelligence) to reconcile all expenditures reported in the FFR.

B. BCAEO's grant managers and financial monitors ensure all CSBG funds are used appropriately during contract review and approvals, statement of expenditure reviews, and financial monitoring visits.

**10.12. Single Audit Management Decisions:** Describe state procedures for issuing management decisions for eligible entity single audits, as required by Block Grant regulations applicable to CSBG at 45 CFR 75.521.

*The Michigan Department of Health and Human Services, Office of Quality Assurance and Internal Controls reviews the single audit. When findings are listed, the Office of Quality Assurance and Internal Controls requests a response from the agency. BCAEO reviews the finding and the agency's response and submits a management decision letter within the time frame defined by the Office of Quality Assurance and Internal Controls.*

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

**10.13. Assurance on Federal Investigations:** The state will “permit and cooperate with Federal investigations undertaken in accordance with Section 678D” of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act.       Yes  No

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

**10.14. Performance Management Adjustment:** Describe any adjustments the state made to monitoring procedures in this State Plan as compared to past plans? Any adjustment should be based on the state’s analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. **[Narrative, 2500 Characters]**

*Verbal exit interviews are more timely and helpful according to agency feedback. The state has been working hard to get monitoring reports out in a quicker timeframe.*

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

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## SECTION 11

### Eligible Entity Tripartite Board

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

- Attend Board meetings
- Organizational Standards Assessment
- Monitoring
- Review copies of Board meeting minutes
- Track Board vacancies/composition
- Other **[Narrative, 2500 characters]**

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

- Annually
- Semiannually
- Quarterly
- Monthly
- As It Occurs
- Other **[Narrative, 2500 characters]**

**11.3. Tripartite Board Representation Assurance:** Describe how the states will verify that eligible entities have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entity's Tripartite Board as required by the assurance under Section 676(b)(10) of the CSBG Act. **[Narrative, 2500 Characters]**

*This question is included in the CAP that the agencies submit and is reviewed by staff. It is also reviewed during monitoring visits.*

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

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

**11.4a.** If yes, describe the mechanism used by public eligible entities as an alternative to a Tripartite Board. **[Narrative, 2500 Characters]**

## Section 12

### Individual and Community Income Eligibility Requirements

**12.1. Required Income Eligibility:** Provide the income eligibility threshold for services in the state. **[Select one item below and numeric response where applicable.]**

- X 125% of the HHS poverty line
- % of the HHS poverty line (fill in the threshold): \_\_\_\_\_% **[Numeric response]**
- Varies by eligible entity **[Narrative, 5000 characters]**

**GUIDANCE:** Under *Varies by eligible entity*, provide the threshold and the reason that it varies by entity.

**12.1a.** Describe any state policy and/or procedures for income eligibility, such as treatment of income and family/household composition. **CSPM 502 will be attached.**

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

*In these rare instances, the state will use data that CAAs collect to ensure that the clients of such services are predominantly low-income individuals. See Attachment above.*

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

*CAAs choose community-targeted services based on results of their Community Needs Assessments and Strategic Planning. Their entire mission is based on providing services to low-income communities. It is not allowable, per our policy, to provide services to clients that are over 125% of poverty with CSBG funds. More direction will be sent to the CAAs once NASCSP completes the pilot of the Community Initiative Status Form review..*

## SECTION 13

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

- 13.1. Performance Measurement System:** Identify the performance measurement system that the state and all eligible entities use, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act. **[Select one]**

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

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

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

*The state requires CAAs to submit logic models annually with their CAP. CAA's receive direction annually through state policy and guidelines.*

- 13.1b. Alternative System Description:** If an alternative system was chosen in Item 13.1, describe the system the state will use for performance measurement. **[Narrative, 5000 characters]**

- 13.2. Outcome Measures:** Indicate and describe the outcome measures the state will use to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization, as required under Section 676(b)(12) of the CSBG Act. **[Select one and Narrative, 5000 characters]**

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

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

- 13.3. Eligible Entity Support:** Describe how the state supports the eligible entities in using ROMA or an alternative performance management system. **[Narrative, 5000 characters]**

*The state currently has ten certified ROMA trainers. The state office has 4 of the 10 trainers on staff. BCAEO provided state-wide ROMA training for all CAAs. The state association, in collaboration with BCAEO, holds ROMA train the trainer trainings annually. BCAEO created a ROMA Collaborative in 2012 made up of staff from CAAs, board members, the state association, and the state. Within that Collaborative there is an NPI sub-Committee that is working on suggested NPIs for agencies using the same programs. Logic models are a required part of the CSBG CAP. The state has started ROMA Implementer Training as well and has 1 CAA staff trained.*

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

- 13.4. Eligible Entity Use of Data:** Describe how the state plans to validate that the eligible entities are using data to improve service delivery.

*This question has been included again as part of the CSBG FY19 CAP that CAAs will have to answer. The state will review performance toward meeting the three CSBG National Goals utilizing the National Performance Indicators (developed within the Community Services Network). 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. A review of the agency's data collection methods will be cross-referenced with their CNA and planning tools. In addition, monitors will look at board minutes to ensure the boards are making informed data-driven decisions. BCAEO is validating by conducting Board Interviews and reviewing Board minutes and conducting front line staff interviews during monitoring visits. Some agencies have re-enrollment letters with quality of service questions, stakeholder/community partner surveys as part of strategic planning, client surveys.*

*The state hired a ROMA Data staff person that will be taking a deeper dive into agency outcomes.*

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

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

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

*All eligible entities (CAAs) requesting CSBG funds are required to submit a CAP in the format prescribed by the state to the MDHHS-BCAEO electronic mailbox. Planning allocation amounts, program requirements, plan criteria, and other pertinent data are distributed annually as a CSBG item update in the BCAEO's 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 three years.) CAPS are reviewed by BCAEO grant manager staff using a CAP checklist review guide (attached as 13.5) for allowability of the use of funds. CAPs are then reviewed by the CSBG Specialist and the BCAEO director to look for cost reasonableness as well as the potential for the proposed activities to move low-income clients toward self-sufficiency. Funding is not distributed until the CAPs are approved.*

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

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

*CAAs are required to include a copy of their latest Community Needs Assessment with their annual CAP (the state recommends that CAAs conduct an assessment every three years.) When an agency fails to conduct a CNA within three years, the agency receives a monitoring letter with a CNA finding. The letter requires a corrective action plan or Technical Assistance Plan to correct the deficiency.*

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

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

**14.1. Use of Funds Supporting Local Activities**

***CSBG Services***

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

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

*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 percent 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. The LIHEAP crisis component, through State Emergency Relief (SER) energy services, is administered by local MDHHS offices and the maintenance component through the state's Department of Treasury through the Home Heating Credit (HHC) program. Some CAAs assist MDHHS 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. The DOE dollars are directly allocated to the state for WAP services. The CAAs have developed referral relationships with their local MDHHS 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 percent 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 counseling, and Individual Development Account (IDA) programs.*

### **Needs of Youth**

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

- (B) to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as--
  - (i) programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and
  - (ii) after-school child care programs;

*CAAs work with partners to develop programs to address the needs of youth in the low-income communities throughout Michigan. Some examples are:*

1. Providing a Women, Infant and Children (WIC) Program. 2. Purchasing supplies for Head Start classrooms. 3. Summer food programs. 4. Walking clubs for youths and seniors to develop new friendships and increase self-esteem. 5. Foster grandparent programs. 6. Residential centers that provide treatment for victims of abuse and neglect. 7. Service clubs that provide activities and games for children. 8. Youth recreation and education. 9. Youth employment programs. 10. School success programs.

### **Coordination of Other Programs**

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

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

*CAA's participation in the state's welfare reform efforts has continued to increase. For the past several years, MDHHS, 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 MDHHS 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, increasing economic opportunity and reducing poverty through jobs, education, and training; CAAs are a resource to partner and/or collaborate with local MDHHS offices and Michigan Works! Agencies to assist clients with supportive services and, where available, to play an active role in training activities. PATH places a strong emphasis on helping welfare applicants/recipients 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 MDHHS 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.*

### **State Use of Discretionary Funds**

**14.2. 676(b)(2)** Describe “how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in section 675C(b) in accordance with this subtitle, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of this subtitle.”

**Note:** the State describes this assurance under “State Use of Funds: Remainder/Discretionary,” items 7.9 and 7.10

**[No response; links to items 7.9 and 7.10.]**

## **Eligible Entity Service Delivery, Coordination, and Innovation**

- 14.3. 676(b)(3)** “Based on information provided by eligible entities in the State, a description of...”

***Eligible Entity Service Delivery System***

- 14.3a. 676(b)(3)(A)** Describe “the service delivery system, for services provided or coordinated with funds made available through grants made under 675C(a), targeted to low-income individuals and families in communities within the State;”

*Most CAAs service delivery systems include information and referral, energy conservation and education, child development and child care, supplemental food programs, older adult nutrition and support services, home buyer assistance, emergency assistance, case management services, tax preparation, and transportation. Clients enter the system various ways. They may have a referral from another human service agency in the county for assistance or from 2-1-1 that meets a specific need such as weatherization. They may have heard of Community Action through word of mouth and contact us themselves. Hospitals make referrals for seniors to participate in Older American Programs. There are various public service announcements reported in the newspaper and radio that alert clients to our services. Also, CAA staff sit on various committees throughout the county or are members of community collaboratives. These members are joined together in a long-term collaborative effort designed to strengthen inter-agency communication, insure coordination, facilitate the continuation of needed existing services, promote community planning activities, and foster the development of consumer focused/culturally relevant services to meet the identified needs of the community.*

***Eligible Entity Linkages – Approach to Filling Service Gaps***

- 14.3b. 676(b)(3)(B)** Describe “how linkages will be developed to fill identified gaps in the services, through the provision of information, referrals, case management, and followup consultations.”

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

**[No response; links to 9.3b.]**

***Coordination of Eligible Entity Allocation 90 Percent Funds with Public/Private Resources***

- 14.3c. 676(b)(3)(C)** Describe how funds made available through grants made under 675C(a) will be coordinated with other public and private resources.”

**Note:** The state describes this assurance in the State Linkages and Communication section, item 9.7.

**[No response; links to 9.7]**

***Eligible Entity Innovative Community and Neighborhood Initiatives, Including Fatherhood/Parental Responsibility***

- 14.3d. 676(b)(3)(D)** Describe “how the local entity will use the funds [made available under 675C(a)] to support innovative community and neighborhood-based initiatives related to the purposes of this

subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting.”

**Note:** The description above is about eligible entity use of 90 percent funds to support these initiatives. States may also support these types of activities at the local level using state remainder/discretionary funds, allowable under Section 675C(b)(1)(F). In this State Plan, the state indicates funds allocated for these activities under item 7.9(f).

*CAAs work with partners to develop programs to address the needs in the low-income communities throughout Michigan. Some examples are: The Bridges Out of Poverty Program; Getting Ahead Program; Energy Education seminars; Community Computer Rooms; Community Nutrition Programs; Parent, Family, and Community Engagement programs; Neighborhood Clean Up Projects; Senior Assistance; Financial Education; Community Baby Shower; Neighborhood-based initiatives; Youth Education; Credit Rebuilder Programs.*

#### **Eligible Entity Emergency Food and Nutrition Services**

- 14.4. 676(b)(4)** Describe how the state will assure “that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals.”

*The 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 Temporary Emergency Food Assistance Program (TEFAP) and Commodity Supplemental Food Program (CSFP) service providers and/or provide home-delivered or congregate meals.*

#### **State and Eligible Entity Coordination/linkages and Workforce Innovation and Opportunity Act Employment and Training Activities**

- 14.5. 676(b)(5)** Describe how the state will assure “that the State and eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services, and [describe] how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 3 of the Workforce Innovation and Opportunity Act, in the State and in communities with entities providing activities through statewide and local workforce development systems under such Act.”

**Note:** The state describes this assurance in the State Linkages and Communication section, items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b.

**[No response; links to items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b]**

## State Coordination/Linkages and Low-income Home Energy Assistance

- 14.6. 676(b)(6)** Provide “an assurance that the State will ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low- income home energy assistance) are conducted in such community.”

**Note:** The state describes this assurance in the State Linkages and Communication section, items 9.2 and 9.5.

**[No response; links to 9.2 and 9.5]**

## Federal Investigations

- 14.7. 676(b)(7)** Provide “an assurance that the State will permit and cooperate with Federal investigations undertaken in accordance with section 678D.”

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

**[No response; links to 10.13]**

## Funding Reduction or Termination

- 14.8. 676(b)(8)** Provide “an assurance that any eligible entity in the State that received funding in the previous fiscal year through a community services block grant made under this subtitle will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b).”

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

**[No response; links to 10.7]**

## Coordination with Faith-based Organizations, Charitable Groups, Community Organizations

- 14.9. 676(b)(9)** Describe how the state will assure “that the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations.”

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

**[No response; links to 9.6]**

## Eligible Entity Tripartite Board Representation

**14.10. 676(b)(10)** Describe how “the State will require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation.”

**Note:** The state describes this assurance under Eligible Entity Tripartite Boards, item 11.3

**[No response; links to item 11.3]**

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

**14.11. 676(b)(11)** Provide “an assurance that the State will secure from each eligible entity in the State, as a condition to receipt of funding by the entity through a community services block grant made under this subtitle for a program, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs.”

**[No response; links to items 13.5 and 13.6]**

### **State and Eligible Entity Performance Measurement: ROMA or Alternate system**

**14.12. 676(b)(12)** Provide “an assurance that the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to section 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and [describe] outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization.”

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

**[No response; links to 13.1, 13.2, 13.3, and 13.4]**

### **Validation for CSBG Eligible Entity Programmatic Narrative Sections**

**14.13. 676(b)(13)** Provide “information describing how the State will carry out the assurances described in this section.”

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

**[No response for this item]**

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

## SECTION 15 Federal Certifications

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

### 15.1. Lobbying

#### *Certification for Contracts, Grants, Loans, and Cooperative Agreements*

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

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### *Statement for Loan Guarantees and Loan Insurance*

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

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

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

## 15.2. Drug-Free Workplace Requirements

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

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

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

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

*Conviction* means a finding of guilt (including a plea of nolo contendere) or imposition of

sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

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

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

### ***Certification Regarding Drug-Free Workplace Requirements***

#### Alternate I. (Grantees Other Than Individuals)

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

- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (b) Establishing an ongoing drug-free awareness program to inform employees about --
  - (1) The dangers of drug abuse in the workplace;
  - (2) The grantee's policy of maintaining a drug-free workplace;
  - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
  - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will --
  - (1) Abide by the terms of the statement; and
  - (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- (e) Notifying the agency in writing, within 10 calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

- (f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -
- (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

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

Place of Performance (Street address, city, county, state, zip code) **[Narrative, 2500 characters]**

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

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

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

### 15.3. Debarment

#### ***CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS***

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

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.
- (2) The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.
- (3) The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.
- (4) The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
- (5) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.
- (6) The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.
- (7) The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and

Voluntary Exclusive-Lower Tier Covered Transaction,” provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

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

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***Certification Regarding Debarment, Suspension, and Other Responsibility Matters - -***

**Primary Covered Transactions**

- (1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:
  - (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;
  - (b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
  - (c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
  - (d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.

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

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

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
- (2) The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
- (3) The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.
- (4) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.
- (5) The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.
- (6) The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
- (7) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

- (8) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
- (9) Except for transactions authorized under paragraph five of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

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

- (1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.
  - (2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.
- By checking this box, the state CSBG authorized official is providing the certification set out above.

#### 15.4. Environmental Tobacco Smoke

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

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