

Community Services Policy Manual

200 Series

General Policy

BCAEO

October 2021

General Policy

**200 SERIES
GENERAL POLICY**

CSPM 200 - Emergency Policy

This policy will become obsolete as of September 30, 2021.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 201	Page 1 of 10
COMMUNITY SERVICES POLICY MANUAL	SUBJECT: General Policy GLOSSARY OF TERMS AND ACRONYMS		EFFECTIVE DATE 6.24.14 ISSUE DATE 6.24.14

PURPOSE

Many acronyms are used with programs administered by federal and state entities. The following list of acronyms is provided to assist the user of this manual.

Acronyms

A

ADA	Americans with Disabilities Act
ARRA	American Recovery and Reinvestment Act
ASHRAE	American Society of Heating, Refrigeration, and Air Conditioning Engineers

B

BCAEO	Bureau of Community Action and Economic Opportunity
BPI	Building Performance Management

C

CAA	Community Action Agency
CAP	Community Action Plan
CAP	National Community Action Partnership
CAP	Corrective Action Plan
CAP	Cost Allocation Plan
CAPLAW	Community Action Program Legal Services, Inc.
CCDF	Child Care Development Block Grant
CDC	Child Development and Care
CFR	Code of Federal Regulations
CSBG	Community Services Block Grant
CSBG-D	Community Services Block Grant – Discretionary
CSBG-IS	Community Services Block Grant Information System Survey
CSPM	Community Services Program Manual

D

DBA	Davis Bacon Act
DHHS	Department of Health & Human Services
DLRA	Michigan Department of Licensing and Regulatory Affairs
DOE	U.S. Department of Energy

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 201	Page 2 of 10
COMMUNITY SERVICES POLICY MANUAL	SUBJECT: General Policy GLOSSARY OF TERMS AND ACRONYMS		EFFECTIVE DATE 6.24.14 ISSUE DATE 6.24.14

DOL U.S. Department of Labor

E

EAP Energy Action Plan
 EECSBG Energy Efficiency and Conservation Block Grant
 EPA Environmental Protection Agency
 EITC Earned Income Tax Credit

F

FACSPRO Family Agency Community Services Pro
 FAP Food Assistance Program
 FEMA Federal Emergency Management Agency
 FIP Family Independence Program
 FIS Family Independence Specialist
 FPL Federal Poverty Guidelines
 FR Federal Register
 FY Fiscal Year

G

GHHI Green and Healthy Homes Initiative

H

H&S Health and Safety
 HDA Housing Development Authority
 HERS Home Energy Rating System
 HHS U.S. Department of Health and Human Services
 HREU High Residential Energy User
 HUD Department of Housing and Urban Development

I

IDA Individual Development Account
 IRA Individual Retirement Account
 IREC Interstate Renewable Energy Council
 ITB Invitation to Bid
 IWC Inspection/Work Order/Cost Center

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 201	Page 3 of 10
COMMUNITY SERVICES POLICY MANUAL	SUBJECT: General Policy GLOSSARY OF TERMS AND ACRONYMS		EFFECTIVE DATE 6.24.14 ISSUE DATE 6.24.14

J

JTA Job Task Analysis

L

LARA Legal and Regulatory Affairs
 LCA LIHEAP - Crisis Assistance
 LIHEAP Low Income Home Energy Assistance Program
 LIT Line Item Transfer
 LPA Limited Purpose Agency
 LSW Lead Safe Work
 LWO Local Weatherization Operator

M

MA Medicaid
 MCAAA Michigan Community Action Agency Association
 MCCAEO Michigan Commission on Community Action & Economic Opportunity
 MDHS Michigan Department of Human Services
 MEAP Michigan Energy Assistance Program
 MHEA Manufactured Home Energy Audit
 MOU Memorandum of Understanding
 MPSC Michigan Public Service Commission
 MSHDA Michigan State Housing Development Authority

N

NASCSP National Association for State Community Services Programs
 NCAF National Community Action Foundation
 NEAT National Energy Audit
 NFA Notice of Funds Available
 NHPA National Historic Preservation Act
 NPI National Performance Indicator
 NREL National Renewable Energy Laboratory

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 201	Page 4 of 10
COMMUNITY SERVICES POLICY MANUAL	SUBJECT: General Policy GLOSSARY OF TERMS AND ACRONYMS		EFFECTIVE DATE 6.24.14 ISSUE DATE 6.24.14

O

OCS U. S. Department of Health and Human Services Office of Community Services
 OMB Office of Management and Budget

P

PA Program Accounts
 POI Pollution Occurrence Insurance
 PRWORA Personal Responsibility and Work Opportunity Reconciliation Act
 PTO Performance Target Outlines
 PY Program Year
 PYTD Program Year To Date

QQCI Quality Control Inspector
 QIP Quality Improvement Plan
 QWP Quality Work Plan

R

ROMA Results Oriented Management and Accountability System
 RSDI Retired, Survivor, Disability Insurance

S

SDA State Disability Assistance
 SEP State Emergency Program
 SER State Emergency Relief
 SERC Sustainable Energy Resources for Consumers
 SEV State Equalized Value
 SHPO State Historic Preservation Office
 SIR Savings-to-Investment Ratio
 SMI State Median Income
 SOE Statement of Expenditures
 SOM State of Michigan
 SSBG Social Services Block Grant
 SSI Supplemental Security Income
 SWS Standard Work Specifications

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 201	Page 5 of 10
COMMUNITY SERVICES POLICY MANUAL	SUBJECT: General Policy GLOSSARY OF TERMS AND ACRONYMS		EFFECTIVE DATE 6.24.14 ISSUE DATE 6.24.14

T

TANF Temporary Assistance for Needy Families
TCE Tax Credit for the Elderly
TREAT Targeted Retrofit Energy Analysis Tool
T/TA Training and Technical Assistance
TWP Technical Weatherization Policy Manual

U

UCB Unemployment Compensation Benefits
USC United States Code
USDA U.S. Department of Agriculture

V

VA Veterans' Administration
VITA Volunteer Income Tax Assistance

W

WA8 Weatherization Assistant
WAP Weatherization Assistance Program
WAPTAC Weatherization Assistance Program Technical Assistance Center
WGM Weatherization Guidance Memo
WIA Workforce Investment Act
WIC Women, Infant and Children's Program
WPN DOE Weatherization Program Notice
WX Weatherization

Y

YTD Year to Date

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 201	Page 6 of 10
COMMUNITY SERVICES POLICY MANUAL	SUBJECT: General Policy GLOSSARY OF TERMS AND ACRONYMS		EFFECTIVE DATE 6.24.14 ISSUE DATE 6.24.14

Glossary of Terms

Action Plans: This is the case management tool within FACSPRO. A customer is enrolled in a program by “creating an interaction” which creates an Action Plan. The action plans have tasks and interventions and are created as a guide for caseworkers detailing steps and documents that need to be confirmed or collected prior to providing assistance. These steps are determined by the agency.

Agency Program: Agency program is set up in FACSPRO by the system administrator for each agency. The agency program is created and then linked to a System program.

Action Plan Dimension: Dimensions are broad categories that link agency programs to interventions. The system administrator must ensure all the appropriate dimensions are listed in FACSPRO after a new agency program has been entered. For each agency program, select at least one corresponding dimension.

Action Plan Interventions: Interventions within a FACSPRO Action Plan represent the results of offering customer assistance. Each intervention is linked to a ROMA National Performance Indicator. The intervention is the action that was taken. (e.g., Customer Receives Emergency Services Utility Payment.)

Action Plan Tasks: Tasks within a FACSPRO Action Plan are steps that caseworkers take to assist a customer. Tasks are dated in the Action Plan as they are created. (e.g., Verified Customer Income.)

Activity/Program: Activities are what a program does with its inputs—the services it provides—to fulfill its mission. Examples are sheltering homeless families, educating the public about signs of child abuse, and providing adult mentors for youth. Program activities result in outputs. *

Ad Hoc Report: Reports can be created in FACSPRO using Ad-Hoc to pull data needed by agency that is not available in a system report.

Application Pro: A module in FACSPRO which is used as a planning tool for the CSBG application. The module replaces the Community Action Plan (CAP) Part II paper document. This module allows CAAs to create logic models for each program including the number expected to apply, the number expected to be served, the mission of the program, reason for the program, and at the end of the year, the actual number served in that program.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 201	Page 7 of 10
COMMUNITY SERVICES POLICY MANUAL	SUBJECT: General Policy GLOSSARY OF TERMS AND ACRONYMS		EFFECTIVE DATE 6.24.14 ISSUE DATE 6.24.14

Award Pro: A module in FACSPRO that is used for programs that provide payment for customer bills. This program allows the caseworker to create a paper voucher with the client information, the vendor information, and then have a supervisor sign off. The agency then sends the voucher to accounting to process the payment. The module then will track the total amounts awarded for a customer to ensure that they do not exceed any maximum award amounts the agency has set. BCAEO uses this to track and report LIHEAP Crisis Assistance funds that are disbursed to CAAs.

BCAEO: This bureau is a part of the Michigan Department of Human Services. The bureau administers Weatherization, CSBG, and LCA Programs.

Community Action Plan (CAP) Part I: BCAEO references the CSBG Application and Expenditure Plan as CAP Part I.

Community Needs Assessment: The CSBG Act requires that the CAP include “a community needs assessment for the community served, which may be coordinated with community needs assessments conducted for other programs.” This should be a process (such as a survey, town meeting or other similar mechanism) to gather input from the target population regarding their current unmet needs and satisfaction with services and procedures.

CSBG (Community Services Block Grant): A federal, anti-poverty block grant which funds the operations of a state-administered network of local agencies.

CSPM (Community Services Policy Manual): Written program policy for all BCAEO administered programs.

DBA Technologies: the company that created FACSPRO.

Document Center: A reference module in FACSPRO that houses BCAEO policy and guides.

FACS Pro: Statewide database used by Community Action Agencies and the State of Michigan Department of Human Services for tracking CAA Network assistance to citizens within the state and show the impact of CAAs in Michigan.

Indicator: (Outcome) indicators are the specific items of information that track a program's success on outcomes. They describe observable, measurable characteristics or changes that represent achievement of an outcome. For example, a program whose desired outcome is that participants pursue a healthy lifestyle could define "healthy lifestyle" as not smoking; maintaining a recommended weight, blood pressure, and cholesterol level; getting at least

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 201	Page 8 of 10
COMMUNITY SERVICES POLICY MANUAL	SUBJECT: General Policy GLOSSARY OF TERMS AND ACRONYMS		EFFECTIVE DATE 6.24.14 ISSUE DATE 6.24.14

two hours of exercise each week; and wearing seat belts consistently. The number and percent of program participants who demonstrate these behaviors then is an indicator of how well the program is doing with respect to the outcome. (United Way)*

Intervention (FACS Pro): Interventions are part of the Action Plan in FACSPro and represent the action an agency performed to help a customer. The intervention in FACSPro is linked to a National Performance Indicator Outcomes.

IS (Information System) Survey (Report): A required annual report that is submitted by each agency receiving CSBG funding to the State Program Office which includes unduplicated data regarding state use of CSBG funds, general information on state and local CSBG agencies, accomplishments and coordination of funds, CSBG expenditures by service category, program participant characteristics, and results of services. The purpose of the report is to show the impact that Community Action has in Michigan and overall impact of self- sufficiency programs offered by the CAAs including all programs, not just CSBG programs. Community Action Agencies submit the report to BCAEO and BCAEO staff compiles the report and send a statewide report to NASCSP. NASCSP was contracted by Health and Human Services to gather IS data and submit data annually. NASCSP then completes a nationwide report including all data submitted by all states.

Lexicon: A reference source for Community Services Block Grant Funded Programs and a classification of CSBG SERVICES for use in the Survey of the CSBG Information System. Located in FACSPro

Measurement Tools: Agency tools used to provide data for outcomes in the ROMA plans. This information is collected for the logic models in the Application Pro module of FACSPro.

NASCSP (National Association for State Community Services Programs): Members are state administrators of the U.S. Department of Health and Human Services Community Services Block Grant (CSBG) and the U.S. Department of Energy's Weatherization Assistance Program (DOE/WAP). NASCSP keeps its members, the federal government, and other interested parties informed about issues related to CSBG and DOE/WAP through its publications and training. NASCSP acts as an advocacy group between Congress and state legislative bodies, educating and updating legislative representatives about state and local initiatives and outcomes.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 201	Page 9 of 10
COMMUNITY SERVICES POLICY MANUAL	SUBJECT: General Policy GLOSSARY OF TERMS AND ACRONYMS		EFFECTIVE DATE 6.24.14 ISSUE DATE 6.24.14

NPIs (National Performance Indicators): Established goals linked to services provided by Community Action Agencies which measure success of programs, need for service, and accountability for services provided.

Outcome: The benefits or changes for clients, households, or a community that are produced during or after participation in program activities.*

Outcome (FACSPRO): The result of helping a customer. This is tracked in the action plan by dating each task and intervention as they are completed and then closing the Action Plan.

Performance Target: Performance targets differ from outcomes in that they seek to determine not only what is accomplished through program funding, but also the relative quality, or adequacy, of such outcomes. Performance targets, or anticipated levels of outcomes expected to be achieved that are set prior to program operation, often provide a standard to measure effectiveness.

Planning Application: The CSBG Act requires that each community service agency develop a Community Action Plan containing all the required documentation. This submission is known as the Planning Application.

ROMA (Results Oriented Management & Accountability): A performance-based initiative designed to preserve the anti-poverty focus of community action and to promote greater effectiveness among state and local agencies receiving Community Services Block Grant (CSBG) funds. ROMA reporting was created to ensure standard measureable objectives and performance goals be tracked by the CAA network and to allow for a better method of telling the story of the accomplishments realized using HHS-CSBG, WAP (and other) funding.
*<http://www.roma1.org/files/rtr/terms.pdf>

Service Categories (FACSPRO term Dimension): The CSBG Act requires the state to ensure the purposes of CSBG funds and mandated plan elements. Each CAA will conduct activities under one or more of the following program categories:
1) Employment; 2) Education 3) Income Management; 4)Housing; 5) Emergency Services; 6) Nutrition; 7) Self-Sufficiency; 8) Health; and 9) Linkages.

System Administrator: An employee at a Community Action Agency who is designated as the FACSPRO assistant to agency staff. Responsibilities include maintaining agency programs, funding, access rights and user set up, training agency staff on how to use FACSPRO and troubleshooting.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 201	Page 10 of 10
COMMUNITY SERVICES POLICY MANUAL	SUBJECT: General Policy GLOSSARY OF TERMS AND ACRONYMS		EFFECTIVE DATE 6.24.14 ISSUE DATE 6.24.14

System Programs: System Programs are programs in FACSPRO set up by the Super User. The system program is where dimensions and action plans are set up. System Administrators then create agency programs and connect them to System Programs.

Super User: This term is used for the designated FACSPRO liaison between System Administrators and DBA Enterprises for system change requests. The Super User assists System Administrators with troubleshooting, System Program set up, System Administrator meetings, maintaining data integrity.

Task (FACSPRO): Tasks are part of the Action Plan in FACSPRO. Tasks serve as a form of case management for caseworkers to track when they completed certain necessary actions to help a client. Tasks can also serve as a form of data collection for certain programs.

Weatherization Pro: A module in FACSPRO used for the Weatherization Assistance Program which allows CAAs to monitor queues that homes are in throughout the weatherizing process. This module directly links to the NEAT/MHEA audit tool and is used to track the details of each weatherization job. The module collects the information required for federal reporting and is also used for technical monitoring.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 203	Page 1 of 1
Community Services Policy Manual	SUBJECT: General Policy MODIFICATIONS TO PLAN DOCUMENTS		EFFECTIVE DATE 12.5.13 ISSUE DATE 12.5.13

REFERENCES

BCAEO Funded Agreements

PURPOSE

A Grantee’s plan may be modified for the following:

- Changes to the types of activities in the approved plan;
- If the Grantee’s expenditures are expected to exceed allowable budget flexibility limitations;
- As determined by the Grantee because of funding level changes;
- To ensure maximum production and expenditure of program funds; or
- Other issues as approved by BCAEO.

POLICY

BCAEO Agreements state that any plan modification must be approved by DHS prior to any change in Grantee services/activities.

Appropriate documentation for changes will be determined by BCAEO.

If an amendment is necessary, one will be created and sent to the Grantee for signature.

SUBMITTAL PROCESS

Submit your request by email to your grant manager with a copy to the DHS-BCAEO@michigan.gov mailbox with “modification request” in the subject line. Please copy your grant manager.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 204	Page 1 of 2
Community Services Policy Manual	SUBJECT: General Policy NAME AND/OR ADDRESS CHANGES		EFFECTIVE DATE 10/1/16 ISSUE DATE 8/9/16

PURPOSE

To provide Grantees with guidelines for legal name and/or legal (main office) address changes to existing Agreements.

POLICY

Legal address (main office) and legal name changes must be requested by the Grantee via email to the MDHHS-BCAEO@michigan.gov mailbox. Amendments to Agreements are required for legal name changes, but not for address changes.

Legal Address Changes (main office):

- An amendment to an existing Agreement is NOT required for address changes.
- In order to process an address change, the Grantee must first update their vendor information in the Contract & Payment Express (C&PE) website at www.cpexpress.state.mi.us. *
- Once the Grantee has made the appropriate changes in C&PE, the Grantee must then request the address change via email to MDHHS-BCAEO@michigan.gov and copy their Grant Manager.
- BCAEO will review the email request and proceed with updating the address.

Legal Name Changes:

- An Amendment to an existing Agreement is required for legal name changes (Agreements must contain the legal name of the Grantee).
- In order to process an amendment, the Grantee must first update their Vendor information in the Contract & Payment Express (C&PE) website at www.cpexpress.state.mi.us. *
- Once the Grantee has made the appropriate changes in C&PE, the Grantee must then request an amendment to change their name via email to MDHHS-BCAEO@michigan.gov and copy their Grant Manager.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 204	Page 2 of 2
Community Services Policy Manual	SUBJECT: General Policy NAME AND/OR ADDRESS CHANGES		EFFECTIVE DATE 10/1/16 ISSUE DATE 8/9/16

The email must include:

- A statement that the Grantee will fully accept any and all service delivery responsibility, financial liability and obligation of the former Grantee in Agreements previously established between MDHHS and the former Grantee.
- A copy of one or more of the following:
 1. Tax Letter (copy of W-9)
 2. The Department of Licensing And Regulatory Affairs (DLARA) Bureau of Commercial Services Filing Endorsement issued by DLARA.
 3. The Certification of Merger/Consolidation issued by DLARA with the Plan of Merger attached.
 4. All signed Trustee Consent Resolutions.
 5. The Certificate of Amendment to the Articles of Incorporation issued by DLARA.
 6. The Certificate of Renewal of Assumed Name issued by DLARA.
- BCAEO will review the email request for accuracy and completeness and proceed with the amendment process.

DTMB Vendor Registraion (C&PE) Information

Online: www.cpexpress.state.mi.us
Help Desk: [\(517\)-373-4111 \(Lansing\)](tel:(517)373-4111)
Toll Free: [\(517\)-888-734-9749 \(all others\)](tel:(517)888-734-9749)
Fax: [\(517\)-373-0297](tel:(517)373-0297)
Email: DMB-vendor@michigan.gov

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 205	Page 1 of 4
Community Services Policy Manual	SUBJECT: General Policy APPEAL POLICY		EFFECTIVE DATE 10.22.14 ISSUE DATE 10.22.14

REFERENCES

Department of Health & Human Services (DHHS), Bureau of Community Action and Economic Opportunity (BCAEO) Administrative Rules of 1990, as amended

PURPOSE

The BCAEO Administrative Rules require BCAEO to establish guidelines for receiving and processing appeals requests for the following:

- a. Applicants who are denied a service by the Grantee for a DHS BCAEO funded program/service.
- b. Grantees that are denied a contract or have funding terminated for cause.
- c. A Community Action Agency whose designation status has been rescinded or altered for cause.
- d. Contractors that are denied a contract or have funding terminated for cause.

DEFINITIONS

Administrative Hearing: a hearing before any governmental agency (BCAEO). The agency will make a ruling.

Grantee: means a local CAA, public agency, nonprofit private agency, nonprofit organization, or other entity that receives funds from BCAEO.

Informal Hearing: a hearing before the CAA's Appeals committee, who will make a determination.

POLICY

The BCAEO Administrative Rules require the Grantee:

- A. to establish an appeals mechanism which provides the opportunity to appeal any of the following:
 1. An application for a low-income service if there has been a partial or complete denial of assistance and if all of the following provisions have been satisfied:
 - a. The services denied are specific, tangible benefits for which BCAEO provides funding.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 205	Page 2 of 4
Community Services Policy Manual	SUBJECT: General Policy APPEAL POLICY		EFFECTIVE DATE 10.22.14 ISSUE DATE 10.22.14

- b. Funds are currently available.
 - c. The Grantee has the authority to provide or disburse funds.
 - d. The applicant has completed a formal, written application for such services.
 - e. The applicant falls within the program guidelines or believes that they can prove they fall within the program guidelines.
2. A service provider's contract has been suspended, terminated, or not renewed.
 3. A contractor's or potential contractor's application or proposal to provide services was denied.
 4. An administrative action that limits or imposes requirements on the contractor or service provider.
- B. through the action of its governing/advisory board, to establish and issue an appeals procedure for the items covered in A 1-4 above which will include all of the following:
1. Written notice to the applicant, contractor, or service provider of the Grantee's action to suspend, terminate, not renew, or deny a contract or service, including a notice of the right to appeal.
 2. Notice that information or criteria on which the Grantee's action was based is available for review by the affected parties.
 3. Notice that the affected party may appear in person or through a designated representative to appeal the Grantee's action.
 4. Provision for, as the initial step of any appeal, a meeting with the Appeals committee within 30 calendar days to review items in dispute and seek clarification or resolution to the dispute.

A record of the meeting, including relevant facts, will be maintained and a determination rendered, in writing, by the Appeals committee, with approval from the governing/advisory board.
 5. A specification that appeals proceedings will be conducted within an aggregate time frame of 60 calendar days, within which time all of the following shall occur:
 - a. A notice of the right to appeal will be sent to the affected party within 20 calendar days of the Grantee's action.
 - b. Any formal appeal will be requested in writing by the affected party or parties within 10 business day's notice pursuant to the provisions of the item above.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 205	Page 3 of 4
Community Services Policy Manual	SUBJECT: General Policy APPEAL POLICY		EFFECTIVE DATE 10.22.14 ISSUEDATE 10.22.14

- c. Upon receipt of an appeal request, an informal hearing will be conducted. The decision rendered will be in writing to the affected party or parties.
- 6. Notice shall be provided that a Grantee’s hearing decision may be appealed to BCAEO which will review and act on the appeal pursuant to R400.19201(5).
- 7. A description of the circumstances under which a request for an appeal hearing may be refused. Such circumstances are limited to the failure to comply with the appeal procedures required by R400.19403 or the lack of standing by the appellant.
- C. through the action of its governing/advisory board, to establish and issue an appeals procedure for the items covered in B.(5)c above which will include all of the following:
 - 1. Written notice to all denied applicants, contractors, or service providers of the administrative appeals process.
 - 2. Written notice that denied applicants, contractors, or service providers may appeal administrative complaints to the Grantee’s Appeal’s committee.
 - 3. Written notice to the appellant of the governing/advisory board's determination within 30 calendar days of the appeal’s filing date.
 - 4. Written notice of the decision shall include a statement that appellants may appeal the decision to DHS within 10 business days of the written notice provided above.
 - 5. A copy of all appeals/complaints shall be kept in the client’s file.

All procedures are to be submitted to BCAEO for review of content and form before final adoption.

Appeal of the Grantee’s Decision

A complainant may file an appeal of the Grantee’s decision within 10 business days of the written decision by the Grantee or within 10 business days of when the decision should have been made. The written appeal shall be submitted to:

Michigan Department of Health & Human Services
Bureau of Community Action and
Economic Opportunity
235 South Grand Avenue, Suite 204
Lansing, Michigan 48909

The appeal shall be in writing and should include, to the extent possible, the following information:

- 1. A copy of the original appeal and all correspondence relating to the appeal.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 205	Page 4 of 4
Community Services Policy Manual	SUBJECT: General Policy APPEAL POLICY		EFFECTIVE DATE 10.22.14 ISSUE DATE 10.22.14

2. The full name, address, and telephone number of the person(s) making the appeal.
3. The full name and address of the party against whom the appeal is made, or other information sufficient to identify the party against whom the appeal is made.
4. A clear and concise statement of the facts, as alleged, including pertinent dates, constituting the alleged violation.
5. The provision of the act, regulation, grant, or other agreements believed to have been violated.
6. The relief requested.

The decision rendered by Administrative Hearings will be made within 30 calendar days from receipt of the appeal and is the final step in the appeal procedure. This decision will be sent in writing to the appellant with a copy to the Grantee.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 206	Page 1 of 2
Community Services Policy Manual	SUBJECT: General Policy CITIZENSHIP/ALIEN STATUS DETERMINATION For NONPROFIT CHARITABLE ORGANIZATIONS		EFFECTIVE DATE 2-15-2012 ISSUE DATE 2-15-2012

BACKGROUND

The Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996 provides that only United States citizens, United States non-citizen nationals, and “qualified aliens” are eligible for federal, state, and local public benefits.

The Low Income Home Energy Assistance Program (LIHEAP), and the Temporary Assistance for Needy Families (TANF) programs are recognized as federal public benefit programs, while the Community Services Block Grant Program (CSBG) and the Department of Energy (DOE) programs have been determined **not** to be federal public benefits programs.

However, to ensure program continuity between the LIHEAP and DOE Weatherization programs, the DOE Weatherization Assistance Program will follow policies associated with the LIHEAP program.

POLICY

Nonprofit charitable organizations providing services with LIHEAP, TANF and CSBG funds are not required to implement verification requirements promulgated by the Department of Justice which were published in the Federal Register on August 4, 1998 (63 FR 41662). In addition, a nonprofit charitable organization is not required under PRWORA to determine, verify, or otherwise require proof of eligibility of any applicant for federal, state, or local public benefits.

Non citizens, regardless of their alien status, should not be excluded from TANF, CSBG programs based solely on their alien status, unless such exclusion is already authorized by another law or rule.

State of Michigan Department of Health & Human Services State Emergency Relief Policy (ERM 202) states that any individual receiving emergency funds (e.g. LCA funding) that are distributed through the Department of Human Services to another organization must provide a social security number of each household member as well as the status of each person identified as an alien. When an individual does not have a Social Security Number, provide an SS-5, Application for Social Security Card.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 206	Page 2 of 2
Community Services Policy Manual	SUBJECT: General Policy CITIZENSHIP/ALIEN STATUS DETERMINATION For NONPROFIT CHARITABLE ORGANIZATIONS		EFFECTIVE DATE 2-15-2012 ISSUE DATE 2-15-2012

Undocumented aliens are not eligible, **but their presence does not disqualify the group.**

DEFINITION OF NONPROFIT CHARITABLE ORGANIZATION

To be considered a nonprofit charitable organization, an organization must be both “nonprofit” and “charitable”.

An organization is “nonprofit” if 1) it is organized and operated for purposes other than making gains or profits for itself or its members, and 2) it cannot distribute any gains or profits to itself or its members.

An organization is “charitable” if it is organized and operated for charitable purposes.

LEGAL REFERENCES

Public Law 97-35, The Omnibus Budget Reconciliation Act of 1981
42 USC 2000a et seq.
8 USC 1641 et seq. (PRWORA)
The Civil Rights Act of 1964
Public Law 104-193, The Personal Responsibility and Work Opportunity Reconciliation Act of 1996, (PRWORA)
Federal Register Notice 63 FR 41658
Federal Register Notice 62 FR 61344 (PRWORA)
DHHS Transmittal No. 30, September 30, 1998 Information Memorandum
DOE Weatherization Program Notice 07-1 Effective 12/1/06
Department of Health & Human Services State Emergency Relief Manual (SERM) 202.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 206A	Page 1 of 4
Community Services Policy Manual	SUBJECT: General Policy CITIZENSHIP/ALIEN STATUS DETERMINATION For LOCAL GOVERNMENT ENTITIES		EFFECTIVE DATE 2/15/2012 ISSUE DATE 02/15/2012

BACKGROUND

The Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996 provides that only United States citizens, United States non-citizen nationals, and “qualified aliens” are eligible for federal, state, and local public benefits.

The Low Income Home Energy Assistance Program (LIHEAP), and the Temporary Assistance for Needy Families (TANF) programs are recognized as federal public benefit programs, while the Community Services Block Grant Program (CSBG) and the Department of Energy (DOE) programs have been determined **not** to be federal public benefits programs.

However, to ensure program continuity between the LIHEAP and DOE Weatherization programs, the DOE Weatherization Assistance Program will follow policies associated with the LIHEAP program.

POLICY

Local Government Entities may have a process in place to verify whether an applicant applying for federal, state, or local public benefits is a U.S. citizen, U.S. non-citizen national, or a qualified alien. This process does not apply to other household members, only the applicant.

State of Michigan Department of Health & Human Services State Emergency Relief Policy (ERM 202) states that any individual receiving emergency funds (e.g. LCA funding) that are distributed through the Department of Human Services to another organization must provide a social security number of each household member as well as the status of each person identified as an alien. When an individual does not have a Social Security Number, provide a SS-5, Application for Social Security Card.

Undocumented aliens are not eligible, **but their presence does not disqualify the group.**

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 206A	Page 2 of 4
Community Services Policy Manual	SUBJECT: General Policy CITIZENSHIP/ALIEN STATUS DETERMINATION For LOCAL GOVERNMENT ENTITIES		EFFECTIVE DATE 2/15/2012 ISSUE DATE 02/15/2012

Acceptable documents to verify citizenship include:

- Birth certificate or other birth record
 - Social Security Card
 - U.S. Passport
 - Voter Registration Card
 - Naturalization papers
 - Identification Card issued by the U.S. Citizenship and Immigration Services (USCIS)
- An applicant's signed statement is also acceptable verification of citizenship/alien status. Page 4 of this item is a sample format that can be used.

Documentation must be included in the applicant's file.

Pursuant to Title VI of the Civil Rights Act of 1964, applicants must not be discriminated against on the basis of race, color, or national origin. Organizations must insure that all applicants are treated in the same manner and that individuals who look or sound foreign are not singled out for closer scrutiny.

DEFINITIONS

“Unites States citizen” is;

1. A person (other than the child of a foreign diplomat) born in one of the several States or in the District of Columbia, Puerto Rico, Guam, the U.S. Virgin Islands, or the Northern Mariana Islands who has not renounced or otherwise lost his or her citizenship;
2. A person born outside of the United States to at least one U.S. citizen parent; or
3. A naturalized U.S. citizen.

“United States non-citizen national” is;

1. A person born in an outlying possession of the United States (American Samoa or Swain's Island) on or after the date the U.S. acquired the possession, or;
2. A person whose parents are U.S. non-citizen nationals (subject to certain residency requirements).

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 206A	Page 3 of 4
Community Services Policy Manual	SUBJECT: General Policy CITIZENSHIP/ALIEN STATUS DETERMINATION For LOCAL GOVERNMENT ENTITIES		EFFECTIVE DATE 2/15/2012 ISSUE DATE 02/15/2012

“Qualified Alien” is;

1. An alien lawfully admitted for permanent residence under the Immigration and Nationality Act (“INA”);
2. An alien granted asylum under section 208 of the INA;
3. A refugee admitted to the U.S. under section 207 of the INA;
4. An alien paroled into the U.S. under section 212 (d)(5) of the INA for at least one year;
5. An alien whose deportation is being withheld under section 243(h) of the INA as in effect prior to April 1, 1997, or whose removal is being withheld under section 241(b)(3) of the INA;
6. An alien granted conditional entry pursuant to section 203(a)(7) of the INA as in effect prior to April 1, 1980;
7. An alien who is a Cuban or Haitian entrant as defined in section 501(e) of the Refugee Education Assistance Act of 1980; or
8. An alien who (or whose child or parent) has been battered or subjected to extreme cruelty in the U.S. and otherwise satisfies the requirements under section 431{c} of the PRWORA.

LEGAL REFERENCES

Public Law 97-35, The Omnibus Budget Reconciliation Act of 1981
 42 USC 2000a et seq.
 8 USC 1641 et seq. (PRWORA)
 The Civil Rights Act of 1964
 Public Law 104-193, The Personal Responsibility and Work Opportunity Reconciliation Act of 1996, (PRWORA)
 Federal Register Notice 63 FR 41658
 Federal Register Notice 62 FR 61344 (PWORA)
 DOE Weatherization Program Notice 07-1 Effective 12/1/06
 Department of Health & Human Services State Emergency Relief Manual (ERM) 202.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 206A	Page 4 of 4
Community Services Policy Manual	SUBJECT: General Policy CITIZENSHIP/ALIEN STATUS DETERMINATION For LOCAL GOVERNMENT ENTITIES		EFFECTIVE DATE 2/15/2012 ISSUE DATE 02/15/2012

Citizenship/Alien Status Statement

Applicant Name: _____

*Applicant Identifier (birth date, etc.): _____

Social Security Number: _____

Agency: _____

I certify that I am ___(Enter "a U.S. citizen" or a "qualified alien")_____

 Signature

 Date

* Enter if needed for internal tracking

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 207	Page 1 of 2
Community Services Policy Manual	SUBJECT: General Policy BY-LAWS and ARTICLES OF INCORPORATION		EFFECTIVE DATE 10.1.15 ISSUE DATE 4.2.15

REFERENCES

- The Community Services Block Grant Act (42 U.S.C. 9901 et seq.) as amended
- National Organizational Performance Standards as developed by the Office of Community Services (OCS).

PURPOSE

To provide guidelines for the submission of information pertaining to an agency's designation, purpose and rules governing its internal affairs.

Pursuant to the CSBG Act, Sections 676 and 678B, it is the duty of the state to conduct evaluations and reviews of eligible entities (CAAs) to determine whether they meet the performance goals, administrative standards, financial management requirements and other requirements as set by the state.

Such evaluations will include an ongoing review of the CAA's designation status and purpose and rules governing its internal affairs (as found in the By-Laws).

POLICY

Private Agencies

- The Grantee is required to submit one copy of changes/amendments to its By-Laws to DHS within 30 days following Board approval and update in FACSPRO.
- The Grantee is required to submit one copy of changes/amendments to its Articles of Incorporation within 30 days following receipt of documentation of filing with the State of Michigan and update in FACSPRO.
- The Grantee shall have an attorney review the By-Laws every five years.
- The Grantee shall have its Governing Board members review the By-Laws at least every two years.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 207	Page 2 of 2
Community Services Policy Manual	SUBJECT: General Policy BY-LAWS and ARTICLES OF INCORPORATION		EFFECTIVE DATE 10.1.15 ISSUE DATE 4.2.15

Public Agencies

- The Grantee is required to submit one copy of changes/amendments to its By-Laws to DHS within 30 days following Board approval and update in FACSPRO.
- The Grantee shall submit a copy of official changes enacted by its local unit of government concerning the Grantee’s status or purpose within that unit and update in FACSPRO.
- Ensure that the tripartite board’s/advisory body’s governing documents have been reviewed for consistency with its local government policies and practices.
- The tripartite board/advisory body receives and reviews its governing documents at least every two years.

SUBMITTAL PROCESS

These documents shall be uploaded to the FACSPRO document center and submitted to the DHS-BCAEO@michigan.gov mailbox.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 208	Page 1 of 1
Community Services Policy Manual	SUBJECT: General Policy <p style="text-align: center;">POVERTY INCOME GUIDELINES</p>		EFFECTIVE DATE 1/16/2025 ISSUE DATE 1/24/2025

REFERENCES

- [U.S. Department of Health and Human Services Poverty Guidelines](#)
- WPN 25-3 (pending release)
- Bureau of Community Action and Economic Opportunity (BCAEO) Agreements

PURPOSE

The U.S. Department of Health and Human Services releases federal poverty guidelines annually to assist with determining financial eligibility for certain programs.

POLICY

The Grantee is required to use income guidelines to determine eligibility for BCAEO-funded activities. This chart is an overview of maximum income by poverty level and family size. This is based on the Federal Poverty level chart and does not include any program specific countable and uncountable income or allowable or unallowable deductions. Please refer to program policy for such details.

Family Size	75% of Poverty	100% of Poverty	125% of Poverty	150% of Poverty	200% of Poverty
1	\$11,738	\$15,650	\$19,563	\$23,475	\$31,300
2	\$15,863	\$21,150	\$26,438	\$31,725	\$42,300
3	\$19,988	\$26,650	\$33,313	\$39,975	\$53,300
4	\$24,113	\$32,150	\$40,188	\$48,225	\$64,300
5	\$28,238	\$37,650	\$47,063	\$56,475	\$75,300
6	\$32,363	\$43,150	\$53,938	\$64,725	\$86,300
7	\$36,488	\$48,650	\$60,813	\$72,975	\$97,300
8	\$40,613	\$54,150	\$67,688	\$81,225	\$108,300

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 209	Page 1 of 11
Community Services Policy Manual	SUBJECT: General Policy <p style="text-align: center;">TRIPARTITE BOARD</p>		EFFECTIVE DATE 9.20.21 ISSUE DATE 10.1.21

REFERENCES

- The Community Services Block Grant Act (CSBG) (42 U.S.C. 9901 et seq.) as amended.
- Public Act 230 of 1981, as amended
- Bureau of Community Action and Economic Opportunity (BCAEO) Administrative Rules, as amended
- Organizational Standards developed by the Office of Community Services (OCS)
- Information Memorandum #82 Tripartite Boards

PURPOSE

To provide guidelines for the implementation of a Tripartite Board as required by the CSBG Act.

Pursuant to the CSBG Act, Section 680(C) GOVERNING BOARDS. For a community development corporation to receive funds ..., the corporation shall be governed by a board that shall consist of residents of the community and business and civic leaders and shall have as a principal purpose planning, developing, or managing low-income housing or community development projects.

Pursuant to the CSBG Act, Section 676B TRIPARTITE BOARDS: In order for a Community Action Agency (CAA) to be considered to be an eligible entity for purposes of section 673(1), the entity shall administer the community services block grant program through a tripartite board that fully participates in the development, planning, implementation, and evaluation of the program to serve low-income communities.

POLICY CHANGES

Added clarification to example on page 2.

Added clarification under compensation on page 6.

Added note for personnel policies on page 10.

POLICY

Pursuant to §676B of the CSBG Act, private nonprofit entities and public organizations have the responsibility for selection and composition of the board.

Adequate Representation on the Board [Reference: CSBG Act - Sec. 676(b)(10)]

The Grantee will 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.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 209	Page 2 of 11
Community Services Policy Manual	SUBJECT: General Policy TRIPARTITE BOARD		EFFECTIVE DATE 9.20.21 ISSUE DATE 10.1.21

Term Limits

A CAA may establish bylaws which allow for term limits and/or procedures for the removal of board members (e.g. members that may miss too many meetings). An administrative rule that purports to establish term limits for a member of a CAA board of directors is void.

Selection and Composition of the Board

Private CAAs

The members of the board shall be selected by the entity and the board shall be composed so as to assure that:

- a. 1/3 of the members of the board are elected public officials, holding office on the date of selection, or their representatives. In the event that there are not enough elected public officials reasonably available and willing to serve on the board, the entity may select appointive public officials to serve on the board. The public officials selected to serve on the board may each choose one permanent representative to serve on the board.
- b. 1/3 of the members are persons chosen in accordance with democratic selection procedures adequate to assure that these members are representative of low-income individuals, elderly, or consumers with disabilities, and families in the neighborhood served; and each representative of low-income individuals and families selected to represent a specific neighborhood within a community, resides in the neighborhood represented by the member.

NOTE: The democratic selection process must be listed in agency bylaws.

- c. 1/3 of the members represent the private sector, including representatives of business and industry, agriculture, labor, religious, law enforcement, education or other major groups and interests in the community served.

Example: If an agency's bylaws state 12-15 members and the agency has 14 board members, there should be at least 4 members in each sector.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 209	Page 3 of 11
Community Services Policy Manual	SUBJECT: General Policy TRIPARTITE BOARD		EFFECTIVE DATE 9.20.21 ISSUE DATE 10.1.21

Public CAAs

Public organizations should establish either:

- a. A tripartite board, which shall have members selected by the organization and shall be composed so as to assure that not fewer than one-third of the members or persons chosen in accordance with democratic selection procedures adequate to assure that these members:
 1. are representative of low-income individuals and families in the neighborhood served;
 2. reside in the neighborhood served; and
 3. are able to participate actively in the development, planning, implementation, and evaluation of programs funded under CSBG; or
- b. If conditions in subparagraphs (1) - (3) of paragraph (a). are not utilized, then another mechanism approved by the state which meets the tripartite requirements may be used. Public organizations that choose to utilize another mechanism must submit to BCAEO, for review and approval, a description of the mechanism to be utilized to select low-income members. The mechanism must assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs funded under CSBG.

Sectors

Consumer Sector (Low-income representatives)

- a. For the purposes of board appointment, a low-income person, consumer sector representative, is a person eligible for a CAA service at the time of his or her appointment or an individual that is representative of low-income individuals and families in a neighborhood served. Low-income person, consumer sector representative, includes senior citizens and handicapped persons.
- b. Each consumer sector member selected to serve on the board may have 1 permanent representative to serve on the board either full-time or when he or she is unable to attend a meeting. The consumer representatives shall be low-income representatives themselves and have the full authority to act for the members whom they represent at meetings of the board.
- c. Consumer sector representative board members shall be chosen in accordance with selection procedures that are adequate to assure that they represent the low-income persons in the community served by the CAA. Consumer sector representative board members shall not be selected by public officials. Consumer sector

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 209	Page 4 of 11
Community Services Policy Manual	SUBJECT: General Policy TRIPARTITE BOARD		EFFECTIVE DATE 9.20.21 ISSUE DATE 10.1.21

representative board members may be selected to either represent a specific area or neighborhood served by the CAA, or at large to represent the community served by the CAA, or to represent a particular organization designated by the board whose membership is composed predominantly of low-income persons.

- d. Every effort should be made by the CAA to assure that low-income members are truly representative of current residents of the geographic area to be served, including racial and ethnic composition, as determined by periodic selection or reselection by the community. "Current" should be defined by the recent or annual demographic changes as documented in the community needs assessment. This does not preclude extended service of low-income community representatives on boards, but it does suggest that continued board participation of longer term members be revalidated and kept current through some form of democratic process; and
- e. The procedure used to select the low-income representative must be documented to demonstrate that a **democratic selection** process was used. Among the selection processes that may be utilized, either alone or in combination, are:
 1. Nominations and elections, either within neighborhoods or within the community as a whole.
 2. Selection of eligible low-income persons at a meeting or conference where the date, time, and place of such meeting or conference have been adequately publicized.
 3. Selection of eligible low-income representatives to a community-wide board by members of neighborhood or subarea boards who are themselves selected by low-income neighborhood or area residents.
 4. Selection on a small area basis, such as a city block, of representatives who in turn select low-income members for a community-wide board.
 5. Selection of eligible low-income representatives by existing organizations designated by a board whose membership is predominantly composed of low-income persons.
 6. Any other selection procedure which assures maximum participation of eligible consumers, subject to BCAEO review and approval.

Public Sector (Elected Officials)

Members from the public sector shall be elected officials or their designated representatives. If the number of elected officials available and willing to serve is less than 1/3 of the membership of the board, appointed public officials may represent the public sector.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 209	Page 5 of 11
Community Services Policy Manual	SUBJECT: General Policy TRIPARTITE BOARD		EFFECTIVE DATE 9.20.21 ISSUE DATE 10.1.21

Public sector representatives, elected or appointed, selected to serve on the board shall have either general governmental responsibilities or responsibilities which require them to deal with poverty-related issues. Public sector representatives shall not be officials with only limited, specialized, or administrative responsibilities.

Each public official member selected to serve on the board may have 1 permanent representative to serve on the board either full-time or when he or she is unable to attend a meeting. The public representatives shall be public sector officials themselves and have the full authority to act for the officials whom they represent at meetings of the board.

Elected public officials are persons who, through a public election process, are elected to a public office.

Examples include: County Commissioners, Mayor, City Council Members, University Trustees or Board of Regents Members, School Board Members, Sheriff, etc.

Appointed public officials are persons who are appointed to their position by an elected public official or a body composed of elected public officials.

Examples include: Appointees to commissions/councils/boards by the Governor, Mayor, or locally elected position/commission/council/board.

Private Sector (Major Groups and Interests)

Each private sector member selected to serve on the board may have 1 permanent representative to serve on the board either full-time or when he or she is unable to attend a meeting. The private representatives shall be private sector officials themselves and have the full authority to act for the officials whom they represent at meetings of the board.

Board Administrative Requirements

- a. Powers of the Board for Private Nonprofit Entities. The board is responsible for abiding by the terms of contracts and shall determine the policies of the agency to assure accountability for public funding. The board shall function as the organization's governing body with the same legal powers and responsibilities as the board of directors of any nonprofit corporation.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 209	Page 6 of 11
Community Services Policy Manual	SUBJECT: General Policy TRIPARTITE BOARD		EFFECTIVE DATE 9.20.21 ISSUE DATE 10.1.21

- b. Powers of the Board for Public Organizations. The powers, duties, and responsibilities of the board shall be determined by the governing officials of the public organization. The governing officials may establish:
 - 1. an advisory board, in which case the authority given to the advisory board depends on the powers delegated to it by the governing officials of the political subdivision; or
 - 2. a governing board, empowering the board of directors with substantive decision-making authority and delegating the powers, duties, and responsibilities to carry out its CSBG-supported contract and functions.
- c. Compensation. Board members are not entitled to compensation for their service on the board, **including stipends or being reimbursed for their time**. Reimbursement of reasonable and necessary expenses incurred by a board member in carrying out his/her duties is allowed. **This may include meals, travel, childcare and other reasonable costs.**
- d. Conflict of Interest. Tripartite board members shall sign a conflict of interest policy, or comparable local government documents for public agencies. No board member may participate in the selection, award, or administration of a subcontract supported by CSBG funds if:
 - 1. the board member;
 - 2. any member of his/her immediate family (as defined in the CSBG contract);
 - 3. the board member's partner; or
 - 4. any organization which employs or is about to employ any of the above, has a financial interest in the firm or person selected to perform a subcontract. No employee of the CAA may serve on the board.

Board Changes/Size

- a. Board Service Limitations for Private Nonprofit Entities and Public Organizations
Subrecipients boards may establish bylaws which allow for term limits and/or procedures for the removal of board members and filling vacancies.
- b. Vacancies/Removal of Board Members
 - 1. Vacancies. In no event shall the board allow public, private, or consumer sector board positions to remain vacant for more than ninety (90) days. Compliance with the CSBG Act requirements for board membership is a condition for eligible entities to receive CSBG funding. There is no provision in the Act for a waiver or exception to these requirements.
 - 2. Removal of Board Members/Private Nonprofit Entities. Public officials or their representatives may be removed from the board either by the board or by the

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 209	Page 7 of 11
Community Services Policy Manual	SUBJECT: General Policy TRIPARTITE BOARD		EFFECTIVE DATE 9.20.21 ISSUE DATE 10.1.21

entity that appointed them to serve on the board. Other members of the board may be removed by the board or pursuant to any procedure provided in the private nonprofit's by-laws.

3. Removal of Board Members/Public Organizations. Board members may be removed from the board by the public organization or by the board if the board is so empowered by the public organization. The board may petition the public organization to remove a board member or the public organization may delegate the power of removal to the board.
- c. The CAA shall inform BCAEO of changes in its Board, by updating the Board Pro section in FACSPRO (See CSPM Item 906), in the following instances:
- ~~As part of the Grantee's Annual Agency Checklist submission,~~
 - Within 30 days following a change in the Chairperson/President, and
 - Within 30 days following the Grantee's annual elections.

Board Responsibilities and Assurances

The Governing board/Advisory board shall assure decision making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs funded under CSBG.

- a. Tripartite Boards have a fiduciary responsibility for the overall operation of the CAA. Members are expected to carry out their duties as any reasonably prudent person would do.

At a minimum, board members are expected to:

1. Maintain regular attendance of board and committee meetings;
2. Develop thorough familiarity with core agency information, such as the agency's bylaws, as appropriate, articles of incorporation, sources of funding, agency goals and programs, federal and state CSBG statutes;
3. Exercise careful review of materials provided to the board;
4. Make decisions based on sufficient information;
5. Ensure that proper fiscal systems and controls, as well as a legal compliance system, are in place;
6. Maintain knowledge of all major actions taken by the agency; and
7. Receive regular reports that includes:
 - Review and approval of all funding requests (including budgets);
 - Review of reports on the organization's financial situation;

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 209	Page 8 of 11
Community Services Policy Manual	SUBJECT: General Policy TRIPARTITE BOARD		EFFECTIVE DATE 9.20.21 ISSUE DATE 10.1.21

- Regular reports on the progress of goals specified in the performance statement or program proposal;
 - Regular reports addressing the rate of expenditures as compared to those projected in the budget;
 - Updated modifications to policies and procedures concerning employee's and fiscal operations; and
 - Updated information on community conditions that affect the programs and services of the organization.
 - Updates to the board on the success of specific strategies included in the Community Action Plan.
- b. Individuals that agree to participate on a tripartite governing board, accept the responsibility to assure that the agency they represent continues to:
1. Assess and respond to the causes and conditions of poverty in their community;
 2. Achieve anticipated family and community outcomes; and
 3. Remain administratively and fiscally sound. Excessive absenteeism of board members compromises the mission and intent of the program.
- c. Residence Requirement:
1. All board members shall reside within the subrecipient's CSBG service area designated by the CSBG contract. Board members should be selected so as to provide representation for all geographic areas within the designated service area; however, greater representation may be given on the board to areas with greater poverty population. Low-income members must reside in the area that they represent; and
 2. Subrecipients may request a waiver of the residency requirement to the Director of the BCAEO for review for consideration and/or approval.
- d. Improperly Constituted Board. If the BCAEO determines that a board of an eligible entity is improperly constituted, the BCAEO shall prescribe the necessary remedial action, a timeline for implementation and possible sanctions which would follow CSPM Item 501.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 209	Page 9 of 11
Community Services Policy Manual	SUBJECT: General Policy TRIPARTITE BOARD		EFFECTIVE DATE 9.20.21 ISSUE DATE 10.1.21

Organizational Standards (OS)

Tripartite Board or board members shall:

1. (OS 3.5) Formally accept the completed Community Needs Assessment.
2. (OS 4.1) Review the agency's mission statement at least every five years to assure that:
 - a. The mission addresses poverty, and
 - b. The agency's programs and services are in alignment with the mission.
3. (OS 4.4) Review the annual update on the success of specific strategies included in the Community Action Plan.
4. (OS 4.5) Review and approve the agency's written succession plan for the CEO/ED. (Public agencies will adhere to local government policies.)
5. (OS 4.6) Receive a report on the agency-wide risk assessment at least every two years.(Public agencies will comply with local government policies.)
6. (OS 5.3 & 5.4) Review the agency's Bylaws (or governing documents) at least every two years, assuring that an attorney reviews them at least every five years.(Review by an attorney is not applicable to public agencies).
7. (OS 5.5) Meet in accordance with the frequency and quorum requirements and fill board vacancies as set out in its bylaws.
8. (OS 5.6) Review and sign the conflict of interest policy at least every two years.
9. (OS 5.7) Receive new board member orientation within six months of being elected.
- 10.(OS 5.8) Receive training on board member duties and responsibilities at least every two years.
- 11.(OS 5.9) Receive programmatic reports at each regular board meeting.
- 12.(OS 6.1 & 6.5) Approve the agency-wide strategic plan at least every five years and receive updates on progress meeting the goals of the strategic plan within the past 12 months.
- 13.(OS 7.1) Assure the personnel policies have been reviewed by an attorney and approve them at least every five years. (This does not apply to public agencies)

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 209	Page 10 of 11
Community Services Policy Manual	SUBJECT: General Policy <p style="text-align: center;">TRIPARTITE BOARD</p>		EFFECTIVE DATE 9.20.21 ISSUE DATE 10.1.21

NOTE: Personnel policies should include provisions such as equal employment, discipline and grievance, job classifications, promotions, and training.

14. (OS 7.4) Conduct a performance appraisal of the Chief Executive Officer (CEO)/Executive Director(ED) within each calendar year. (Public Agencies will follow local governmental procedure.)
15. (OS 7.5) Review and approve the CEO/ED compensation within every calendar year. (Public Agencies will follow local governmental procedure.)
16. (OS 7.7) Review and approve the agency's whistleblower policy and any amendments to the policy.
17. (OS 8.2) Assess the findings from the prior year's annual audit and address where appropriate. (Public Agencies will follow local governmental procedure.)
18. (OS 8.4) Receive and accept the agency's annual audit that the agency's auditor presents.
19. (OS 8.6) Review the agency's IRS Form 990 annually.(This does not apply to public agencies)
20. (OS 8.7) Review the agency's financial reports at each regular meeting. These reports must include at a minimum: (Public Agencies will have input as allowed by local governmental procedure.)
 - a. Agency-wide Revenue and Expenditures report
 - b. Balance Sheet/Statement of Financial Position
21. (OS 8.9) Review and approve the agency-wide budget annually. (Public Agencies will have input as allowed by local governmental procedure.)
22. (OS 8.10) Review and approve the agency's financial policy every two years. (This does not apply to public agencies)
23. (OS 8.11) Review the written procurement policy at least every five years. (This does not apply to public agencies)
24. (OS 9.3) Review and take action if necessary, at least annually, an analysis of the agency's outcomes and any operational or strategic program adjustments and improvements identified as necessary.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 210	Page 1 of 3
Community Services Policy Manual	SUBJECT: General Policy <p style="text-align: center;">TRIPARTITE BOARD MEETINGS</p>		EFFECTIVE DATE 10.1.21 ISSUE DATE DRAFT

REFERENCES

The Community Services Block Grant Act (42 U.S.C. 9901 et seq.) as amended
 Michigan’s Open Meetings Act, as amended (PA 258 of 2012)
[Public Act 254; 2020-PA-0254.pdf \(mi.gov\)](#)
 Michigan Economic and Social Opportunity Act, Act 230 of 1981
 Michigan Compiled Law, 500.5245
 BCAEO Administrative Rules, as amended
 BCAEO Guidance Document 2021 9-30

PURPOSE

The Community Services Block Grant Act requires a CAA’s board to participate in the development, planning, implementation, and evaluation of the CAA’s program to serve the low-income community. The board’s meeting minutes provide an opportunity to build a record demonstrating that the board is fulfilling this obligation.

CAAs are subject to the Open Meetings Act (OMA), Act 267 of 1976, MCL 15.261-15.275 and the Freedom of Information Act (FOIA), Act 442 of 1976, MCL 15.231-15.246, pursuant to the Michigan Economic and Social Opportunity Act, Act 230 of 1981, specifically MCL 400.1114.

POLICY CHANGES

Removed Open Meetings Act language. Agencies should follow the most recent OMA language.

POLICY

CAA governing boards or advisory boards shall meet on a regular basis at least six times per year to conduct official business. The meetings shall be scheduled for the convenience of its members and the general public. The meetings shall follow Michigan’s Open Meetings Act, as amended (PA 258 of 2012).

Meeting Requirements

- Quorum is the minimum number of members who must be present for a board to act. Any substantive action taken in the absence of a quorum is invalid. If a CAA lacks a

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 210	Page 2 of 3
Community Services Policy Manual	SUBJECT: General Policy <p style="text-align: center;">TRIPARTITE BOARD MEETINGS</p>		EFFECTIVE DATE 10.1.21 ISSUE DATE DRAFT

quorum when it convenes, the board members in attendance may receive reports and comments from the CAA, ask questions, and comment on matters of interest.

A majority of the board of directors constitutes a quorum for the transaction of business. A quorum should be 51% of the **seated** members and this should be stated in the agency bylaws.

Meeting Postings

Follow requirements per the Michigan Open Meetings Act (PA 528 of 2012, as amended)

Meeting Minutes

- Shall be prepared and made available to the public pursuant to the provisions of section 14 of PA 230 of 1981.
- Minutes from the CAA's Tripartite Board meetings shall be uploaded into the BoardPro section of FACSPRO (see CSPM Item 906) within 30 days once they are approved.
- Governing Board and Advisory Board minutes may both be uploaded into FACSPRO and should be identified by name. BCAEO only requires minutes from the board that makes up the tripartite board requirement.
- Must include the following:
 - Date, Time, and Location;
 - Note whether it is a regular or special meeting;
 - Attendees and Guests;
 - Quorum;
 - Action on prior meeting minutes;
 - Major proposals and the actions taken;
 - Treasurer's report;
 - Major discussions;
 - Committee reports;
 - Compensation decisions;
 - and shall include any handouts or attachments.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 211	Page 1 of 2
Community Services Policy Manual	SUBJECT: General Policy Merging of Community Action Agencies		EFFECTIVE DATE 10.22.14 ISSUE DATE 10.22.14

REFERENCES

- The Community Services Block Grant Act (42 U.S.C. 9901 et seq.) as amended
- BCAEO Administrative Rules: R 400.19603 - R 400.19608
- Merge Minnesota: Nonprofit merger as an opportunity for survival and growth
http://nonprofitfinancefund.org/files/images/initiatives/mergeminnnesota_mapfor nonprofits.pdf

PURPOSE

To provide guidelines for community action agencies (CAAs) that wish to merge together to become one newly established CAA to promote organizational sustainability and preserve services.

POLICY

1. When an eligible CAA is proposing to merge with another eligible CAA, the directors of the CAAs, along with their board members shall collaborate to create a written request for a merger and submit it to the Director of BCAEO. Both CAAs must be in good standing and not in jeopardy of losing their designation.

The Director of BCAEO shall either approve or disapprove the designation within 90 business days pursuant to the procedure set forth in the provisions of R 400.19606 of the BCAEO Administrative Rules. If approved, the designation shall be provisional for 120 calendar days. During this period, the newly created CAA shall:

- establish required operating and management procedures,
- select and appoint members of the governing board, and
- formally adopt bylaws.

A status report of these activities and related documents shall be submitted to the Director of BCAEO within the 120-day provisional period. If the Director is satisfied that all actions and plans are in order, the agency shall receive final designation as a CAA. The Director of BCAEO may extend the 120-day provisional period for an additional 60 calendar days.

2. A change in designation shall not take place unless a written transition plan or closedown plan, approved by BCAEO is followed. The party or parties responsible for the preparation and execution of the plan shall be identified by BCAEO. A transition plan shall ensure the orderly transfer of program functions, obligations, records, authority, and funds from the existing CAAs to a new CAA. A closedown plan shall ensure the orderly termination of program activities and disposition of funds, records, and property.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 211	Page 2 of 2
Community Services Policy Manual	SUBJECT: General Policy Merging of Community Action Agencies		EFFECTIVE DATE 10.22.14 ISSUE DATE 10.22.14

3. BCAEO may reallocate available resources, as necessary, when there has been a change in the designation of a CAA serving a community. BCAEO, in making such a reallocation, shall take into consideration the financial obligations of the CAAs being replaced and the fiscal needs of the new CAA.
4. Within 60 business days of the written request for the merger, public meetings shall be held in the service areas of the current CAAs to provide low income and other citizens with the service area the opportunity to review and comment upon the suggested merger of the two CAAs.

Attachment 1 has been added for your reference

HELPFUL INFORMATION

The following information has been taken from *Merge Minnesota: Nonprofit merger as an opportunity for survival and growth*, which can be found at this website:

http://nonprofitfinancefund.org/files/images/initiatives/mergeminnesota_mapfornonprofits.pdf

What is a Merger?

A merger is the integration of all programmatic and administrative functions of multiple organizations, to increase the administrative efficiency and/or program quality of one or more of the partners. They can also integrate to increase geographic reach or achieve synergy between programs. Mergers occur when one or more organizations dissolve and become part of another organization's structure. The surviving organization may keep or change its name. A merger also occurs when two or more organizations dissolve and establish a new structure that includes some or all of the resources and programs of the original organizations.

How to Decide if a Merger is Best for Your Agency?

Look at the questions below. If most answers are yes, perhaps a merger is an option worth further investigation:

- Are you looking for a way to gain new skills and/or improve your organization's infrastructure?
- Are there services that you do not currently provide that would be complementary or enhance your current services to clients?
- Are you losing an executive director, or experiencing other turnover at the executive level?
- Do you have close partnerships or alliances that might lead to merger?
- Is it difficult to recruit and/or retain board members, or are your board members burned out and looking to step back from their current levels of involvement?
- Are you experiencing difficulty retaining middle management and other key staff?
- Have you had to reduce your infrastructure, such as technology, marketing or accounting functions?
- Have you experienced a steep increase in overhead/administrative costs?
- Have you lost a funding source, or is this likely in the near future?
- Are your fundraising efforts inadequate to meet across-the-board organizational cost increases?
- Do you have a strong program component but continuing challenges supporting it?
- Are you annually budgeting uncommitted revenues?

Project ReDesign's 10 Step Merger Decision Making Process

Step 1: Initial assessment meeting with executive directors and/or board chairs

Step 2: Leadership team meets to develop initial drafts of "Common Understandings" and "Making the Case."

Step 3: Each board of directors passes resolution to "intend to merge" and appoints members to a joint committee.

Step 4: Joint committee meets as needed to review and approve "Common Understandings" and "Making the Case."

Step 5: Legal review of both organizations is conducted.

Step 6: Joint committee presents recommendation for merger, based on "Common Understandings" and "Making the Case," to boards of directors. Boards approve recommendation.

Step 7: The Plan of Merger is drafted

Step 8: Each Board approves plan

Step 9: Membership approves plan

Step 10: Submit legal findings

Merger Best Practices

1. Focus on mission and the best interest of those you serve.
2. Create a clear vision that will guide the newly-merged organization.
3. Involve people who will be affected in the process.
4. Create a strong board and solid staff leadership.
5. Deal with key issues early and directly (use "Common Understandings").
6. Pay attention to organizational culture and integration issues.
7. Involve outside consultants and attorneys who have experience in nonprofit mergers.
8. Have a clear, organized decision-making process (a merger model).
9. Develop a communications plan.
10. Have a realistic funding plan.
11. Have a recommended date for merger completion.
12. Have measurements in place to determine merger success.

HELPFUL INFORMATION

The following information has been taken from *Merge Minnesota: Nonprofit merger as an opportunity for survival and growth*, which can be found at this website:

http://nonprofitfinancefund.org/files/images/initiatives/mergeminnesota_mapfornonprofits.pdf

What is a Merger?

A merger is the integration of all programmatic and administrative functions of multiple organizations, to increase the administrative efficiency and/or program quality of one or more of the partners. They can also integrate to increase geographic reach or achieve synergy between programs. Mergers occur when one or more organizations dissolve and become part of another organization's structure. The surviving organization may keep or change its name. A merger also occurs when two or more organizations dissolve and establish a new structure that includes some or all of the resources and programs of the original organizations.

How to Decide if a Merger is Best for Your Agency?

Look at the questions below. If most answers are yes, perhaps a merger is an option worth further investigation:

- Are you looking for a way to gain new skills and/or improve your organization's infrastructure?
- Are there services that you do not currently provide that would be complementary or enhance your current services to clients?
- Are you losing an executive director, or experiencing other turnover at the executive level?
- Do you have close partnerships or alliances that might lead to merger?
- Is it difficult to recruit and/or retain board members, or are your board members burned out and looking to step back from their current levels of involvement?
- Are you experiencing difficulty retaining middle management and other key staff?
- Have you had to reduce your infrastructure, such as technology, marketing or accounting functions?
- Have you experienced a steep increase in overhead/administrative costs?
- Have you lost a funding source, or is this likely in the near future?
- Are your fundraising efforts inadequate to meet across-the-board organizational cost increases?
- Do you have a strong program component but continuing challenges supporting it?
- Are you annually budgeting uncommitted revenues?

Project ReDesign's 10 Step Merger Decision Making Process

Step 1: Initial assessment meeting with executive directors and/or board chairs

Step 2: Leadership team meets to develop initial drafts of "Common Understandings" and "Making the Case."

Step 3: Each board of directors passes resolution to "intend to merge" and appoints members to a joint committee.

Step 4: Joint committee meets as needed to review and approve "Common Understandings" and "Making the Case."

Step 5: Legal review of both organizations is conducted.

Step 6: Joint committee presents recommendation for merger, based on "Common Understandings" and "Making the Case," to boards of directors. Boards approve recommendation.

Step 7: The Plan of Merger is drafted

Step 8: Each Board approves plan

Step 9: Membership approves plan

Step 10: Submit legal findings

Merger Best Practices

1. Focus on mission and the best interest of those you serve.
2. Create a clear vision that will guide the newly-merged organization.
3. Involve people who will be affected in the process.
4. Create a strong board and solid staff leadership.
5. Deal with key issues early and directly (use "Common Understandings").
6. Pay attention to organizational culture and integration issues.
7. Involve outside consultants and attorneys who have experience in nonprofit mergers.
8. Have a clear, organized decision-making process (a merger model).
9. Develop a communications plan.
10. Have a realistic funding plan.
11. Have a recommended date for merger completion.
12. Have measurements in place to determine merger success.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 212	Page 1 of 4
Community Services Policy Manual	SUBJECT: General Policy SANCTIONS AND CONTRACT CLOSE OUT		EFFECTIVE DATE 10.22.14 ISSUE DATE 10.22.14

REFERENCES

- The Community Services Block Grant Act (42 U.S.C. 9901 et seq.) as amended
- Bureau of Community Action and Economic Opportunity (BCAEO) Administrative Rules

PURPOSE

To provide instruction to Community Action Agencies (CAAs) on the correct procedures for contract sanctions and close out.

POLICY

Sanctions

1. CAAs that have entered into contract with the BCAEO to administer programs are required to follow state and federal laws and regulations and rules governing these programs.
2. Except as expressly modified by law or the terms of a CAA's contract, the CAA shall comply with the cost principles and uniform administrative requirements set forth in the Uniform Administrative Requirements.
3. If a CAA fails to comply with the requirements, rules, and regulations of the CSBG, Weatherization Assistance Program (WAP), or LCA programs, and in the event monitoring or other reliable sources reveal material deficiencies in performance, or if the subrecipient fails to correct any deficiency within the time allowed by federal or state law, the BCAEO will apply one or more of the following sanctions:
 - a.) Request supporting documentation to verify expenditures on the Statement of Expenditure (SOE). BCAEO will complete a full review for every SOE prior to payment.
 - b.) Withhold all payments from the CAA (both reimbursements and advances) until proof of compliance with the rules and regulations are received by the BCAEO, reduce the allocation of funds (with the exception of Community Services Block Grant (CSBG) funds to eligible entities) or impose sanctions as deemed

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 212	Page 2 of 4
Community Services Policy Manual	SUBJECT: General Policy SANCTIONS AND CONTRACT CLOSE OUT		EFFECTIVE DATE 10.22.14 ISSUE DATE 10.22.14

appropriate by the BCAEO Director, at any time, if the BCAEO identifies possible instances of fraud, abuse, fiscal mismanagement, or other serious deficiencies in the subrecipients' performance;

- c.) Suspend performance of the contract or reduce funds until proof of compliance with the rules and regulations are received by the BCAEO or a decision is made by the BCAEO to initiate proceedings for contract termination;
- d.) Elect not to provide future grant funds to the subrecipient (with the exception of the CSBG 90% funds to eligible entities); or
- e.) Terminate the contract. Adhering to the requirements governing each specific program administered by the BCAEO, as needed, the BCAEO may determine to proceed with the termination of a contract, in whole or in part, at any time the BCAEO establishes there is good cause for termination. Such cause may include, but is not limited to, fraud, abuse, fiscal mismanagement, or other serious deficiencies in the CAA's performance. For CSBG contract termination procedures, please refer to CSPM Item 501 (relating to Termination and Reduction of Funding).

The BCAEO will issue a termination letter to the CAA no less than thirty (30) days prior to terminating the contract. The BCAEO may determine to take one of the following actions: a.) suspend funds immediately; b.) establish a cost reimbursement plan for closeout proceedings; or c.) provide instructions to the CAA to prepare a proposed budget and written plan of action that supports the closeout of the contract.

Contract Closeout

Close-out will include, but not be limited to the following procedures:

1. The closeout/transition plan must identify the name and current job titles of staff that will perform the close-out, a proposed budget, closeout activities, timeline, and a communication strategy. The BCAEO will respond within ten (10) working days from receipt of the plan.
2. The CAA will submit backup documentation for all current expenditures associated with the closeout for reimbursement. The required documentation will include, but not be limited to, the chart of accounts, detailed general ledger, revenue and

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 212	Page 3 of 4
Community Services Policy Manual	SUBJECT: General Policy		EFFECTIVE DATE 10.22.14
	SANCTIONS AND CONTRACT CLOSE OUT		ISSUE DATE 10.22.14

expenditure statements, time sheets, payment vouchers and/or receipts, and bank reconciliations.

Assets/Equipment

1. Upon receipt of the termination notice, the CAA will take a physical inventory and will submit to the BCAEO an inventory of equipment with a unit acquisition cost of \$5,000 or greater for WAP and CSBG.
 - a. The CAA will comply with Federal Office of Management and Budget (OMB) Circulars regarding the disposal of assets acquired with funds from these grant contracts.
 - b. Per OMB regulations, CAA will include a description of the inventory, serial number, fund source, title name, cost acquisition amount, percent of federal participation, location, use, condition, and ultimate disposition, and fair market value.
 - c. The CAA will transfer title to equipment having a unit acquisition cost (the net invoice unit price of an item of equipment) of \$5,000 or greater.
2. The CAA shall dispense of the equipment no later than thirty (30) calendar days after the contract is terminated.

Client Files/FACSPRO

1. The CAA will have thirty (30) calendar days from the date of the termination to organize all client files in the FACSPRO database.
 - a. The CAA will enter all completed WAP jobs into the FACSPRO database system in accordance with the CSPM 900 series.
 - b. The CAA will still be responsible for the following sections as listed in the grant contracts even after the end date: "Examination and Maintenance of Records" and "Closeout."
 - c. This will be at the expense of the CAA.

Final Reports

1. The CAA will prepare and submit no later than thirty (30) calendar days from the date the contract is terminated, a final SOE and supporting documentation containing a full accounting of all funds expended under the contract.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 212	Page 4 of 4
Community Services Policy Manual	SUBJECT: General Policy <p style="text-align: center;">SANCTIONS AND CONTRACT CLOSE OUT</p>		EFFECTIVE DATE 10.22.14 ISSUE DATE 10.22.14

2. A final Programmatic Report for all remaining expenditures incurred during the close-out period must be received by the BCAEO no later than thirty (30) calendar days from the date the BCAEO determines that the closeout of the program and the period of transition are complete.

Audit Requirements

1. As required by OMB Circular A-133, a current year Single Audit must be performed for all agencies that have exceeded the federal expenditure threshold of \$500,000.
 - a. The BCAEO will allow a proportionate share of program funds to pay for accrued audit costs, when an audit is required, for a Single Audit that covers the date up to the closeout of the contract.
 - b. The terminated CAA must have a binding contract with a CPA firm on or before the termination date of the contract.
 - c. The actual costs of the Single Audit and accrued audit costs including support documentation must be submitted to the BCAEO no later than thirty (30) days from the date the BCAEO determines the close-out is complete.

Transition Plan

Upon selection of a new service provider, the CAA will complete a Transition Plan as stated in the BCAEO Administrative Rules and the grant agreements under the "Transition Responsibilities" section.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 213	Page 1 of 1
Community Services Policy Manual	SUBJECT: General Policy Whistleblower Protection		EFFECTIVE DATE 04.01.2015 ISSUE DATE 03.05.2015

REFERENCES

- Whistleblower Protection Act of 1989, Public Law 101-12 State of Michigan: The Whistleblowers' Protection Act 469 of 1980, 15.362
- Organizational Standards

PURPOSE

All organizations with active Michigan Department of Health & Human Services (DHHS) Bureau of Community Action and Economic Opportunity (BCAEO) Agreements must establish policy and procedures for:

- The submission of concerns regarding questionable accounting or audit matters by employees, directors, officers, and other stakeholders of the organization, on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints received by the organization regarding accounting, internal controls, or auditing matters.
- The protection of directors, volunteers and employees reporting concerns from retaliatory actions.

POLICY

All organizations with active contracts with DHHS BCAEO must have policy which prohibits the Grantee from discharging, demoting, or otherwise discriminating against an employee for disclosures by the employee that the employee reasonably believes are evidence of

- (1) gross mismanagement of a contract or grant relating to federal funds;
- (2) a gross waste of federal funds;
- (3) a substantial and specific danger to public health or safety related to the implementation or use of federal funds;
- (4) an abuse of authority related to implementation or use of federal funds; or
- (5) a violation of law, rule, or regulations related to an agency grant (including competition for or negotiation of a grant), awarded or issued relating to federal funds.

The Grantee shall post notice of the rights and remedies available to employees.

MICHIGAN DEPARTMENT OF HEALTH & HUMAN SERVICES		Item 214	Page 1 of 1
Community Services Policy Manual	SUBJECT: General Policy <p style="text-align: center;">Conflict of Interest</p>		EFFECTIVE DATE 2.17.2021 ISSUE DATE 2.17.2021

REFERENCES

- All Bureau of Community Action & Economic Opportunity (BCAEO) Agreements
- 2 CFR 200.112 and 45 CRF 75.112
- Internal Revenue Service
- Organizational Standards

PURPOSE

The purpose of the Conflict of Interest policy is to protect Michigan Department of Health & Human Services (DHHS) BCAEO and contracted partners' interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an organization, an officer or director, or board member of the organization or might result in a possible excess benefit transaction.

POLICY

All organizations with active Agreements with DHHS BCAEO must have a Conflict of Interest Policy in place for board members , and staff, and volunteers within their agency. The policy must outline conflict of interest meaning, disclosure procedures and process for determining conflict of interest. The policy must abide by all federal and state laws governing conflict of interest applicable to nonprofit organizations.