State of South Carolina

Community Services Block Grant

CFDA #93.569

PY 2016 State Plan

Department of Administration

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TABLE OF CONTENTS

OEO CSBG Staff 1

I. **INTRODUCTION**
- A. Statutory Authority (State and Federal) 2
- B. Purpose 2

II. **THE NARRATIVE STATE PLAN**
- A. **Administrative Structure** 3
  - 1. OEO's Mission and Responsibilities 3
  - 2. Eligible Entities 8
- B. **Description of Criteria and Distribution Formula** 11
  - 1. Allocation and Distribution of Funds 11
  - 2. Recapture Provision 11
  - 3. Distribution Formula 11
  - 4. Funding Constraints 11
  - 5. Funding Limitations and Prohibitions 11
    - (Construction) 11
    - (Political Activities) 12
    - (Nondiscrimination) 12
- C. **Corrective Action and Suspension of Funding (Hearings & Appeals Procedure)** 12
- D. **The State Community Services Program** 13
  - 1. Program Overview 13
  - 2. Community Needs Assessments 14
  - 3. Tripartite Boards 14
- E. **Eligibility Requirements** 15
  - 1. Income Eligibility 15
  - 2. Program Eligibility 16
- F. **Programmatic Assurances** 16
  - 1. Local Initiative Projects 16
  - 2. General Emergency Assistance Program (GEAP) 16
    - (Assistance Level) 17
    - (Program Eligibility Criteria for GEAP) 17
    - (Coordination) 18
    - (Funding) 19
  - 3. State Discretionary Projects 19
    - Youth Leadership Program 19
      - (Project Start-Up and Compliance) 19
      - (Equipment) 19
      - (Requirements) 20
    - Technology Support 21
    - SC Association of Community Action Partnerships 21
  - 4. Community Food and Nutrition 21
- G. **CSBG Client Assistance Payments** 22
- H. **Coordination** 22

III. **OEO GRANT MANAGEMENT SYSTEM**
- A. Fiscal Accountability 22
- B. Audit Requirements 23
- C. Monitoring Process 23
- D. Investigations 23

E. Semi-Annual and Information Systems (IS) Reporting 23
F. Policy Guidance 24
G. Training and Technical Assistance 24
H. Tentative Timetable: Submissions for PY 2016 CSBG Funds 24

IV. **PY 2016 APPLICATION PROCESS**

A. Work Plan/Application Documents and Procedures 25
B. Project Review and Approval Procedure 25
C. Policy on Rejected Projects 27
D. Policy on Late Submissions 27

V. **APPENDICES**

Appendix A: Glossary of Key Terms
Appendix B: Detailed Application Procedures
Appendix C: OEO Form 507 – Identification Information & Capacity
Appendix D: OEO Form 509 – Subgrantee Financial Capability Survey
Appendix E: OEO Form 511 – Outreach Narrative
Appendix F: Subgrantee Project Description Narrative and Logic Model
Appendix F-1: OCS' Monitoring and Assessment –National Goals and Outcome Measures
Appendix F-2: National Indicators Listing and Preliminary Agency Checklist
Appendix G: Prior Year Report
Appendix H: Board Composition/Member Information
Appendix I: Census 2010 US Sample Demographic Profiles
Appendix J: Semi-Annual Evaluation Form
Appendix K: OEO ROMA Reporting Form
Appendix L: Youth Leadership Permission Forms
Appendix M: Youth Leadership Evaluation Forms
Appendix N: CSBG Monitoring Instrument
Appendix O: Information Memorandum (IM) 138: State Establishment of Organizational Standards for CSBG Eligible Entities under 678B of the CSBG Act
Appendix P: Distribution List

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I. INTRODUCTION

The State of South Carolina shall administer a statewide anti-poverty program in accordance with the Community Services Block Grant Act through funds allocated by the Secretary of the U.S. Department of Health and Human Services (HHS). This program shall be identified in South Carolina as the Community Services Block Grant (CSBG) Program.

In PY 2015, HHS appropriated (under the final Continuing Resolution legislation) $654,041,943 to states for CSBG. Of that, $10,305,861 was awarded to the State of South Carolina for CSBG programs.

The Office of Economic Opportunity (OEO) administers the South Carolina CSBG Program and a network of fourteen (14) community action agencies delivers services to every county in the State. Working in partnership with the community action agencies and the SC Association of Community Action Partnerships (SCACAP), OEO will fund services and activities designed to have a measurable reduction on poverty-related conditions and promote the development of social and economic self-sufficiency among low-income individuals, particularly families who are attempting to transition from poverty.

CSBG service categories include, but are not limited to, employment, education, self-sufficiency, income management, housing, emergency services, nutrition, health and safety and linkages. The “other” service category may be approved based on the local needs assessment. In PY 2016, the focus for South Carolina Results-Oriented Management and Accountability (SCROMA), the State’s client management software system, will include long-range development and improved customization for better tracking and outcomes reporting. Efforts will also include targeted training of CAA system administrators to encourage network ownership and to increase system use for live intake by agency program staff.

A. STATUTORY AUTHORITY

1. STATE STATUTORY AUTHORITY

The General Assembly of South Carolina enacted the "Community Economic Opportunity Act of 1983," Act 143 of the 1983 South Carolina Code of Laws. The law became effective June 17, 1983. **The Office of Economic Opportunity (OEO), 1205 Pendleton Street, Columbia, South Carolina 29201, (803) 734-0662**, was designated as the State’s administering agency for the Community Services Program under a provision of this law.

The State of South Carolina shall administer the Community Services Block Grant Program (herein referred to as CSBG) in accordance with the following federal statutory authorities.

2. FEDERAL STATUTORY AUTHORITY

- Title VI, Subtitle B, of the Omnibus Budget Reconciliation Act of 1981 (PL 97-35, as amended), which is also cited as "Community Services Block Grant Act," and is herein referred to as the "Act".

- Augustus Hawkins Human Services Reauthorization Act of 1984 (PL 98-558); Reauthorization Act of 1986 (PL 99-425) and Reauthorization Act of 1990 (PL 101-501), as amended.

- PY 1996 CSBG Appropriation Legislation (PL 104-134); C.F.R. Title 45, Part 96.

- Community Opportunities, Accountability, and Training and Educational Services Act of 1998 or the Coats Human Services Reauthorization Act of 1998 (PL 105-285); Department of Health and Human Services Block Grant Regulations, Current Poverty Income Guidelines; The Community Services Block Grant Act (42 U.S.C. 9901 et seq., as amended); The Community Services Block Grant Amendments of 1994, and Human Services Amendments of 1994, (PL 103-252).

The Act authorizes the Secretary of the U.S. Department of Health & Human Services (HHS) to make grants to states *for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families in rural and urban areas to become fully self-sufficient (Sec. 672(1)).* The CSBG funds were first made available to states in Fiscal Year 1982 and are expected to continue to be available through Fiscal Year 2016.

B. PURPOSE

In PY 2016, the State of South Carolina will fund projects designed to reduce the conditions of poverty, which affect those persons with incomes at or below the poverty level. The Office of Economic Opportunity will issue guidelines for eligibility of such persons.

South Carolina has approximately 790,937 (2010 Data, U.S. Department of Commerce, Bureau of the Census, STF 3 Profile Table) persons who live on incomes at or below the poverty level as established by the federal government.

The needs of these individuals encompass the entire range of life necessities including health, education, employment, and housing. The severity of need and kinds of poverty-related conditions vary from community to community.

To accomplish anti-poverty goals, yet allow for maximum flexibility among agencies in meeting locally identified needs, the State shall require that CSBG funds be used for projects having a measurable and potentially major impact on the causes of poverty in the local community using a community action plan which shall include:

1. a current, annual community needs assessment;
2. a description of the service delivery system targeted to low-income individuals and families in the service area;
3. a description of how linkages, to the maximum extent possible, will be developed with other organizations including faith-based, charitable groups, and community organizations to fill identified gaps in services through information, comprehensive case management, and follow-up consultations;
4. a description of how funding under the Act will be coordinated with other public and private resources; and
5. a description of outcome measures to be used to evaluate success in promoting self-sufficiency, family stability and community revitalization.

II. THE NARRATIVE STATE PLAN

A. ADMINISTRATIVE STRUCTURE

1. OEO Mission and Responsibilities

a. The mission of the OEO is to expand awareness of our human service programs throughout the State of South Carolina and to implement and maintain technical support for our service agencies in the areas of moving eligible families, including the elderly and disabled, from their current economic condition to stabilized and ultimately self-sufficient.

The OEO is charged with specific responsibilities, which collectively provide for the coordination of resources to address the needs of the economically and socially disadvantaged citizens of South Carolina. The OEO is responsible for administering, supervising and monitoring those matters pertaining to these programs: Community Services Program, Low-Income Home Energy Assistance, Weatherization and Project SHARE funded operations in South Carolina. The OEO is also the state's contact for the Stewart B. McKinney Act for Emergency Shelter Grant funds and is responsible for the dissemination of homeless information throughout the state.

The OEO shall administer the Community Services Program in accordance with the State Plan, State and Federal statutes and other policies and interpretations as may be required by appropriate State or Federal authorities.

The OEO, through Grant Agreements with eligible Subgrantees, will carry out the services and activities necessary to comply with Section 675(c)(1) of the Act. OEO's minimum responsibilities as the state administering agency are:

1. Development of the State Plan and of the CSBG fund distribution process;
2. Establishment of program policies and operational procedures;
3. Development of accounting policies and procedures;
4. Development of fiscal procedures, including required audits;
5. Procedures for record maintenance and for supporting documentation;
6. Issuance of policies and procedures for compliance with Act 143 of 1983, South Carolina Code of Laws, referenced as the "Community Economic Opportunity Act of 1983", as amended;
7. Review and approval of Subgrantee Work Plans;
8. Determination of Subgrantee eligibility;
9. Issuance of grants;
10. Monitoring of the program throughout the state;
11. Training and technical assistance;
12. Evaluation of Subgrantee agency program performance and identification of remedial procedures;
13. Reporting of program data.

b. OEO's Outcome Statements and Performance Targets

The CSBG outcome statements, performance targets, and activities/milestones for the State of South Carolina for PY 2016 are as follows:

Outcome Statement 1: To fund anti-poverty programs and activities that will, as a result, achieve measurable improvement in the overall lives of clients, their households, and communities of South Carolina's low-income populations; utilizing comprehensive case management best practices for eligible families and individuals served, as feasible. To achieve this goal, the State establishes the following objectives:

Performance Target 1: *As a prerequisite to the continuation of existing programs and/or new program development and implementation, each Subgrantee must conduct a current year-to-date CSBG Program Evaluation.*

Activity/Milestone 1: Using the Subgrantee Semi-Annual Narrative Report, each Subgrantee must evaluate the current program year Performance Targets (Objectives) and outline proposed revisions for the coming year. These revisions are needed to improve project outcome(s). The Program Evaluation must be completed and submitted to OEO by July 16, 2016.

Performance Target 2: *Using a variety of mechanisms to solicit information, as a prerequisite to continuation of existing programs and/or new programs, each Subgrantee must conduct an annual needs assessment within and reflective of the needs and conditions of the respective service area to include each county served. Data sources must be included, current and clearly cited.*

Activity/Milestone 2: Each Subgrantee must submit a current Needs Assessment along with the Work Plan. The current Needs Assessment should identify the need and community involvement and should avoid duplication of services when possible (Appendix B).

Performance Target 3: *To fund programs to achieve self-sufficiency.*

Activity/Milestone 3: Ensure that subgrantees provide services related to the needs of low-income families and individuals, so that these services may have a measurable and potentially major impact on the causes of poverty in the community and may help the families and individuals to achieve self-sufficiency.

Performance Target 4: *To fund programs that will decrease the State's current unemployment rate and the number of underemployed persons in the low-income populat*ion.

Activity/Milestone 4: Subgrantees provide programs which will create sustainable employment and increase earned income opportunities. Any employment projects submitted to the OEO, to include the use of CSBG funds, must include current written coordination, and are required to be a One-Stop Partner under the Workforce Innovation and Opportunity Act (WIOA) with local offices of the SC Department of Employment and Workforce. Roles and responsibilities must be outlined. Each Subgrantee's referral arrangements/coordination plans shall be documented in the Work Plan. Evidence of referrals and coordination shall be clearly cited in client files.

Performance Target 5: *According to the 2000 U.S. Census (Table DP-2), South Carolina has over 600,000 people aged 25 years and older, without a high school diploma. It is the State's intent to only fund programs designed and/or proven to increase the number of persons in the low-income population that obtain an adequate education in order that they may begin to progress and ultimately attain self-sufficiency*.

Activity/Milestone 5: Subgrantees provide programs that will provide definitive evidence of actually assisting young persons and uneducated/undereducated adults in completing their education. Uneducated/undereducated and illiterate adults should also be targeted for assistance. Any educational project is encouraged to include current written coordination with local school district and any state technical and/or vocational schools in the Subgrantee's area. Roles and responsibilities are to be defined to prevent the duplication of services. Each Subgrantee's referral arrangements/coordination plans shall be documented in the Work Plan. Evidence of referrals and coordination shall be clearly cited in client files.

Performance Target 6: *To fund programs that will decrease the number of persons in the low-income population residing in substandard housing*.

Activity/Milestone 6: Subgrantees provide program opportunities that will assist low-income persons in securing and maintaining new and/or safe and affordable housing. Any housing project must include current written coordination with local housing authorities, municipalities, county governments or any other organizations that are involved in service area housing programs.

Performance Target 7: *To fund programs that will ameliorate the immediate, adverse affects of malnutrition and health-related issues for low-income persons.*

Activity/Milestone 7: Subgrantees provide programs to help reduce the adverse affects of health-related issues and increase the availability of nutritional food sources, while improving nutritional skills. Nutrition project may include current written coordination with faith-based organizations, other community organizations, local offices of the Agricultural Extension Services of Clemson University and the South Carolina Department of Social Services in the Subgrantee's service area. Each Subgrantee's referral arrangements/coordination plans shall be documented in the Work Plan.

Performance Target 8: *To fund support programs that provide energy assistance and improve home energy and income management skills to decrease the number of low-income persons adversely affected by the cost of home energy.*

Activity/Milestone 8: Subgrantees provide staff support programs in accordance with OEO-approved Low-Income Home Energy Assistance Program (LIHEAP) Operational Plans, designed to improve home energy and income management skills and provide energy assistance for program-eligible households. CSBG support for energy projects must be coordinated with the OEO LIHEAP. Each Subgrantee's referral arrangements/coordination plans shall be documented in the Work Plan and evidence of referrals and coordination shall be clearly documented in client files.

Outcome Statement 2: To fund emergency assistance programs for the low-income population to stabilize crisis situations for potentially vulnerable clients and their households.

Performance Target 1: *Subgrantees create an Emergency Assistance Program which provides aid to meet urgent and immediate individual family needs.*

Activity/Milestone 1: General Emergency Assistance Programs (GEAP), submitted to the OEO for funding through CSBG, should include current written coordination with faith-based organizations, other community organizations, the local Department of Social Services, United Way, and appropriate private and public organizations that are engaged in the provision of emergency aid in the service area; thereby providing entire households with other agency-area programs and services creating opportunities for increased overall stability and self-sufficiency. Each Subgrantee's referral arrangements/coordination plans shall be documented in the Work Plan. The State will allocate at least seven and one-half percent (7.5%) of the total State allocation for Outcome Statement 2 above.

Outcome Statement 3: The State will assist in the coordination of CSBG projects with other governmental, social service, faith-based organizations and other community organizations to access program eligible data. Subgrantee Work Plans should outline the coordination efforts of community partners.

Performance Target 1: *To promote an ongoing exchange of authorized information and other data between project operators and related State and Federal human service agencies, including, but not limited to: The U.S. Department of Health and Human Services, the South Carolina Department of Social Services, the South Carolina Department of Health and Human Services, the U.S. Department of Housing and Urban Development, and the South Carolina Department of Employment and Workforce. The purpose of the information exchange is to coordinate project activities for maximum efficiency and effectiveness and prevent the duplication of service within the local service area.*

Activity/Milestone 1: The State will:

a. Ensure linkages between agencies are established;
b. Continue to facilitate the implementation of the SCROMA Reporting System; thereby enhancing the communication among agencies for the provision of services to participants and avoiding duplication of efforts;
c. Identify growth in agency and State collaborations which result in moving applicants/participants and their households toward self-sufficiency; and
d. Ensure, as a result of the CSBG funds invested, that non-monetary assistance programs that require the use of other funds and resources are well documented and demonstrate a move toward increased self-sufficiency for clients and their households.

Outcome Statement 4: The State will ensure funded activities are producing measurable results through effective administration. The State will provide ongoing training and technical assistance to ensure proper process evaluation for desired results.

Performance Target 1: *The State will monitor and evaluate the performance of the Subgrantees in the implementation and completion of all CSBG projects in accordance with State and Federal monitoring guidelines.*

Activity/Milestone 1:

a. The OEO will conduct at least one monitoring visit every three years, to each Subgrantee during the period January 1, 2016 through December 31, 2016.

b. The OEO may conduct a formal, in-depth evaluation of CSBG projects through a team monitoring visit and SCROMA database analysis which will assess overall performance in resource allocation, fiscal and program implementation and operations.

Outcome Statement 5: The State will ensure that eligible entities are increasing the availability of local, public and private funds, and in-kind dollars.

Performance Target 1: *Subgrantees will develop and implement a plan to expand partnerships and other collaboratives to further increase public and private resources.*

Activity/Milestone 1: Each Subgrantee must provide the OEO performance targets and activity/milestones for increasing agency capacity in the Work Plan.

Outcome Statement 6: The State will assist in assuring board compliance.

Performance Target 1: *The State will conduct a complete review of each agency's board of directors to ensure compliance with State and Federal law. When out of compliance, the OEO will provide technical assistance to the Subgrantee to ensure that boards are in compliance, properly structured and fully participating in the development, implementation and evaluation of agency programs to serve low-income communities.*

Activity/Milestone 1: With the submission of the PY 2016 Work Plan, Subgrantees will provide the OEO an updated current board of directors and standing committees' rosters and completed and signed board composition forms. Subgrantees will submit to the OEO a set of minutes for each board meeting no later than thirty (30) days following the approval of the minutes. Changes in composition are to be reported by the Board Chairperson to the OEO within thirty (30) days of the change.

Performance Target 2: *The State will conduct a complete review of each agency's board by-laws to ensure compliance with State and Federally required tripartite board structure and other pertinent information such as duties of the executive director, board officers and members, filling vacancies, and process for electing board members, especially representatives of the poor.*

Activity/Milestone 2a: Subgrantees will provide the OEO a current copy of the board's bylaws and policies and procedures manual along with the Work Plan.

Activity/Milestone 2b: Subgrantees will provide the OEO a description of the process used to identify and select local board members, including business representatives along with the Work Plan.

Activity/Milestone 2c: Subgrantees will provide the OEO copies of nomination letters that document board representatives are nominated by the appropriate organizations, entities, or agencies along with the Work Plan.

2. Eligible Entities

a. PY 2016 Eligible Entities - The OEO will accept applications for PY 2016 funds only from Eligible Entities as defined in section of 676A of the CSBG Act. All PY 2016 eligible entities are listed on the CAA Directory below. The OEO may exclude any of the eligible entities which have not complied with the criteria and policies established by the OEO. The Office of the Governor shall, in accordance with Federal or State legislation, extend the geographic service area as necessary to other eligible entities in order to permit the more effective provision of services.

b. Eligible Entities (Subgrantees) Responsibilities - The OEO will make grants to Subgrantees to carry out the services and activities necessary to comply with Section 675C(a)(1) of the Act. The following minimum responsibilities shall be included in each grant agreement:

1. Reporting of program and fiscal data when and as required by the OEO;
2. Maintenance of an accounting system which provides adequate documentation of payments and costs, with supporting fiscal records in accordance with policies issued by the OEO and OMB Circulars;
3. Establishment of internal monitoring checks and balances for each project to assure that only eligible clients are served; assistance is appropriate; procedures are established to serve the elderly and the disabled; and that outcomes are achieved;

4. Assistance in the conduct of and participation in any hearing, termination proceeding, inspection, audit or evaluation of any aspect of the program;
5. Provide an annually approved HHS or OEO Indirect Cost Rate;
6. Adherence to policies and procedures issued by the OEO;
7. Adherence to administrative procedures issued by the OEO;
8. Adherence to the provisions of the State Plan and instructions associated with the Act issued by the OEO;
9. Employment of key project staff appropriate for the conduct of respective projects;
10. Maintenance of program records;
11. Safeguarding of the assets of the Community Services Block Grant;
12. Securing of fidelity bonding and such other insurance coverage as outlined in the grant agreement;
13. Compliance with OEO grant agreement;
14. Completing timely corrective actions to remedy errors and/or problems identified by the OEO;
15. Compliance with the requirements for equal opportunity, affirmative action, civil rights protection and for the handicapped as may be prescribed in State or Federal regulations; and
16. Compliance with policies issued by the OEO associated with Act 143 of 1983, South Carolina Code of Laws, referenced as the "Community Economic Opportunity Act of 1983", as amended.

c. **General Requirements** - All eligible entities that apply for Program Year 2016 CSBG funds shall comply with the following requirements:

1. Shall serve a targeted service area as defined in the Glossary of Key Terms (Appendix A);
2. Must have experience in successfully operating projects impacting on the social and economic causes of poverty;
3. Must have an acceptable financial management system and an independent audit in compliance with OMB Omni Circular;
4. Must have an approved current Indirect Cost Rate;
5. Must have a tripartite Board of Directors (Section D. 3. Tripartite Boards);
6. Must have a valid charter as a 501(c)3 nonprofit organization from the South Carolina Secretary of State or otherwise be legally constituted by State law; and
7. Must have thoroughly organized, implemented, and specifically reported the National Indicators of Community Action Performance in the proposed Work Plan (see Appendix F-2).
8. Must have accurately completed and timely submitted the most recent Community Services Block Grant Information System (CSBG/IS) Survey.

Results-Oriented Management and Accountability (ROMA) System - Eligible entities will participate in and comply with the ROMA System, which the Secretary facilitated development of pursuant to Section 678E, utilizing SCROMA and provide a description of specific measures to be used to substantiate the outcomes of each funded program and eligible entity performance in promoting self-sufficiency, family stability, and community revitalization.

PY 2016 ELIGIBLE ENTITIES – SOUTH CAROLINA COMMUNITY ACTION AGENCIES DIRECTORY

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Ms. Reba Hough-Martin, **CSBG & LIHEAP**
Ms. Yolonda Johnson, **FISCAL**

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CAA STATE ASSOCIATION

SC Association of Community Action Partnerships
2700 Middleburg Drive, Suite 213
Columbia, SC 29204
PHONE: (803) 771-9404 FAX: (803) 771-9619

Ms. Jessica McMoore, Executive Director
Ms. Earner Turner, Administrative Assistant

B. DESCRIPTION OF CRITERIA AND DISTRIBUTION FORMULA

1. ALLOCATION AND DISTRIBUTION OF FUNDS - A total of ninety (90%) of the State's total CSBG allocation shall be awarded through grants (based on the distribution formula outlined in Section B) for the purpose of implementing anti-poverty projects to address CSBG legislative goals as set forth in Section 675(C)(1) and Section 672 of the Act. The State will use not less than ninety percent (90%) of the funds allocated under Section 674 of the Act to make grants to eligible entities, as defined in Section 673(1). Funds under this assurance will be allocated as follows:

   a. Eighty-two and one-half percent (82.5%) of Program Year 2016 funds will be used for funding local initiative projects that are developed by eligible entities to meet Outcome Statement 1 as specified in this plan.

   b. Seven and one-half percent (7.5%) of Program Year 2016 funds will be allocated to eligible entities to fund the General Emergency Assistance Program (GEAP) as described under Outcome Statement 2 of this plan.

Five percent (5%) of Program Year 2016 grant will be used to fund State Discretionary Programs in accordance with Section 675(C)(b)(1).

The State will not expend more than five percent (5%) of its allotment in compliance with Section 675C(b)(2) for administrative expenses at the State level, to include support of other OEO administered programs such as Low Income Home Energy Assistance (LIHEAP), Weatherization, and/or Emergency Shelter Grants.

The State will not transfer more than 5% of its allotment under Section 674 to services under the *Older Americans Act of 1965*, the Head Start program, the Energy Crisis Intervention Program, or the *Temporary Emergency Food Assistance Act of 1983*.

Two or more eligible entities may join together to be one project operator as long as they are within the geographic confines of a single Council of Government (COG) area. If two or more eligible entities within a COG area join together to operate a project to serve the poor population of their respective service areas, the application submission shall be submitted jointly. Administration and fiscal procedures will be followed as directed by the OEO. Joint operation could enable smaller eligible entities to implement new and broader-scope activities which will impact upon the poor. It can also stimulate cooperative efforts among eligible entities.

2. RECAPTURE PROVISION – P.L. 108-447 mandates, "That to the extent Community Services Block grant funds are distributed as grant funds by a State to an eligible entity, that's provided under the (CSBG) Act, and have not been expended by such entity, they shall remain with such entity for carryover into the next fiscal year for expenditure by such entity consistent with program purposes."

3. DISTRIBUTION FORMULA - The funds available for a service area shall be allocated on a ratio determined by calculating the number of poor in the service area in relation to the total poor in the State based on current available statistical data. This distribution shall be used for all State Community Services Program components (i.e., local initiative projects and GEAP).

   The 2016 State Discretionary projects will be funded from available amounts for Youth Leadership Programs only based on 5% of Program Year 2016 funds provided to the State. The expectation from the State is that these funds will be leveraged to increase availability of programs and services to eligible youth.

4. FUNDING CONSTRAINTS - State CSBG funding will not be known until Congress appropriates funds for Program Year 2016. This will likely occur late in 2015 after the State Plan has been finalized. Accordingly, the State may find that the CSBG grant is insufficient to fund all projects. The State will then develop an alternative approach in order that funded projects will provide a meaningful impact toward achievement of Outcome Statement 1.

5. FUNDING LIMITATIONS & PROHIBITIONS – The following constraints are applicable to any State or local organization receiving CSBG funds under the Community Services Block Grant. Additionally, each State grant utilized to award funds to eligible organizations shall, at a minimum, contain these limitations and prohibitions.

   a. <u>Construction</u> - In accordance with *Section 678F(a)(1) of the CSBG Act*, the State or eligible entities will not use any portion of the State CSBG allocation for the purchase or improvement of land or construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility. Upon the submission of a waiver request from the State, the Secretary of Health and Human Services may waive the construction limitation if it is determined that extraordinary circumstances exist to justify the purchase of land or the construction of facilities (or the making of permanent improvements) and that permitting the waiver will contribute to the State's ability to carry out the purposes of the Act.

b. Political Activities – No portion of the State allocation shall be used in connection with political activities as set forth in *Section 678F(b)(1-3) of the CSBG Act* and *United States Code Title 5, Chapter 15, Section 1502(a)(i)(2-3)*. CSBG grant funds shall not be used for activities associated with partisan or nonpartisan political activities or any political activity associated with a candidate, or contending faction or group, in an election for public or party office; any activity to provide voters or prospective voters with transportation to the polls or similar assistance in connection with such election, or any other voter registration activity.

c. Nondiscrimination – In accordance with *Section 678F(c)(1) of the CSBG Act*, the State and Subgrantees will practice and enforce that "No person shall, on the basis of race, color, national origin, or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with funds made available under this subtitle."

C. CORRECTIVE ACTION AND SUSPENSION OF FUNDING (HEARINGS & APPEALS PROCEDURE)

In administering this section, the OEO has adopted most of the *Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments* referred to as the "Common Rule". When a Subgrantee defaults or fails to comply with the terms of the award, whether in the State Plan, the Statute, regulations, Grant Agreement, OEO Fiscal Guidance Manual or other official OEO Memoranda, the Subgrantee may be placed on "high risk" status.

A. When the OEO determines that the Subgrantee:
   (1) Has a documented history of unsatisfactory performance;
   (2) Is not financially stable;
   (3) Has a management system that does not meet the written management standards set forth by OEO;
   (4) Has not conformed to terms, conditions, covenants and stipulations of previous grant awards;
   (5) Is otherwise not responsible, and if the OEO determines that an award will be made, special conditions and/or restrictions shall correspond to the high risk condition and shall be included in the award.

B. Special conditions and/or restrictions the OEO may impose may include:
   (1) Payment to the Subgrantee on a reimbursement basis in accordance with Section C of Appeals Procedures;
   (2) Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given funding period;
   (3) Requiring additional detailed financial reports and/or data;
   (4) Additional project monitoring and interim audits;
   (5) Requiring the Subgrantee to obtain technical and/or management assistance;
   (6) Establishment of additional prior approvals;
   (7) Establishment of additional constraints as necessary and appropriate in the circumstances; and
   (8) Require Board acknowledgement of agency's status.

C. If the OEO decides to impose such special grant conditions, the OEO will notify the Subgrantee, in writing, as early as possible, of the following:
   (1) The nature of and reason for the special conditions and/or restrictions;
   (2) The corrective actions which must be completed and approved by OEO prior to the removal of the special conditions and/or restrictions and the time allowed for completing the corrective actions;
   (3) The method of appeal for reconsideration of the imposed conditions/restrictions; and
   (4) The training and technical assistance OEO is offering to the Subgrantee, if appropriate, to help correct the deficiency. In addition, OEO will submit a report to the US DHHS Secretary as to the type of assistance offered. If training and technical assistance are not appropriate, OEO will submit a report to the Secretary detailing the reason why.

Process for Termination

Any eligible entity which received funding in the previous fiscal year under the Act will not have its present or future funding terminated or reduced below the proportional share of funding it received in the previous year, unless after written notice, and opportunity for hearing on the record, the Grantee determines that cause existed for such termination.

Termination is defined as the permanent withdrawal of funding by the state administering authority of an eligible entity's authority to obligate previously awarded funds before that authority would otherwise expire, or the

refusal of the state to continue funding to the eligible entity. A temporary suspension of funding for administrative enforcement purposes shall not constitute a statutory termination or reduction of funding.

If the Grantee believes cause for funding termination exists, the following steps shall be followed:

A. If Subgrantee fails to correct any and all deficiencies identified during a corrective action plan or if based on the seriousness of any of the deficiencies, the Grantee determines Termination is appropriate, a certified letter will be sent from the Grantee's Director to the Subgrantee's Board Chairperson advising him/her of Grantee's recommendation to terminate the grant, along with the reasons for this recommendation. Within fifteen (15) days of receipt of this recommendation, the affected agency may request a hearing in writing to appeal this recommendation.

B. If the agency appeals Grantee's recommendation, the Governor's Chief Legal Counsel will select a Hearings Officer to conduct the hearing within thirty (30) days of receipt of the letter of appeal, utilizing the informal disposition procedures outlined in S.C. Code §§ 1-23-310 to 1-23-400 of the State Administrative Procedures Act. All proceedings will be recorded.

C. All decisions made by the Hearings Officer are final.

D. A Federal review of the State decision to reduce or terminate funding may be initiated through a request from the affected organization. In accordance with 45 CFR §96.92, an eligible entity has 30 days following notification by the State of its final decision to request a review by the Secretary of the Department of Health and Human Services (HHS).

   The US DHHS Secretary will either accept or deny this request.

   1. If the request for review is denied, defunding procedures will begin immediately and will be concluded not more than 3 months following the date of the hearing.

   2. If the request for review is granted, the Secretary will review the hearing officer's determination not later than ninety (90) days after receiving from the State all necessary documentation relating to the determination.

      a) If the Secretary upholds the State's determination, defunding procedures will begin immediately
      b) If the determination is overturned by the Secretary, the grant relationships with the subject agency will be continued.
      c) If the review is not completed within ninety (90) days, the determination of the State will become final on the 91st day and defunding procedures will begin as outlined

In the event funding termination occurs, the Office of Economic Opportunity shall either extend the geographic service area of an eligible entity when a designated entity can no longer provide CSBG services or submit a Request for Proposal and bid for a new eligible entity. This will be done, as necessary, to provide services to the poor in that service area and shall be administered in accordance with existing Federal and State legislation.

THE STATE COMMUNITY SERVICES PROGRAM

1. PROGRAM OVERVIEW

The Community Services Program shall seek to enable and strengthen the ability of low-income individuals and their families on an equal opportunity basis through activities and helping processes to identify and bolster their capabilities and by providing the necessary supports for them to negotiate service systems and obtain needed resources. Program services shall be designed to create opportunities for low-income families to exercise decision-making power and control over their life affairs and to provide appropriate avenues for these persons to express, as well as enhance, their skills and abilities.

Linkages will be developed with local entities to fill identified gaps in services through the provision of information, referrals, case management and follow-up consultations. Funds made available to eligible entities will be coordinated with other public and private resources and may be used to support innovative community and neighborhood-based initiatives with the goal of strengthening families.

Services shall seek to promote social and economic self-sufficiency through the acquisition and development of knowledge, skills and abilities that will enable low-income individuals to effectively respond to and manage those life circumstances that negatively impact their well-being and accomplishment of life goals. Through the

strengthening of individual and family competencies, services shall enable low-income persons to mobilize the resources and support necessary to deal with existing problems, needs and future aspirations.

2. COMMUNITY NEEDS ASSESSMENTS

The State will secure from each eligible entity in the State along with the Work Plan, as a condition of funding, a **current community-needs assessment** for the community served, to include each county served, which may also be coordinated with community-needs assessments conducted for other programs.

Refer to Appendix B for information describing how the State will carry out this assurance.

3. TRIPARTITE BOARDS

In order for a public organization to be considered to be an eligible entity, for the purposes of 673(1), the entity shall administer the CSBG Program through:

(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 are persons chosen in accordance with democratic selection procedures adequate to assure that these members:

- (i) are representative of low-income individuals and families in the neighborhood served;
- (ii) reside in the neighborhood served; and
- (iii) are able to participate actively in the development, planning, implementation, and evaluation of programs funded under this subtitle; or
- (iv) another mechanism specified by the State to assure decision making and participation by low-income individuals in the development, planning, and evaluation of programs funded under this subtitle.

A tripartite Board of Directors must be constituted in compliance with Section 676B of the Act so as to assure that:

1. **One-third of the members of the Board must be elected public officials, holding office on the date of selection, or their representatives, except that if the number of such elected officials reasonably available and willing to serve on this Board is less than one-third of the membership of the Board, membership on the Board of appointive public officials or their representatives may be counted in meeting such one-third requirement;**

2. **Not fewer than one-third of the members are persons chosen in accordance with democratic selection procedures adequate to assure that these members are representative of low-income individuals and families in the area served and such members reside in the neighborhood represented;**

3. **The remainder of the members are officials or members of business, industry, labor, religious, law enforcement, education or other major groups and interests in the community served, and**

4. **The Board "…fully participates in the development, planning, implementation, and evaluation of the program to serve low-income communities (Sec. 676B(b)).**"

Eligible entities will establish procedures under which a low-income individual, community organization, religious organization, or representative of low-income individuals that considers its organization or low-income individuals to be inadequately represented on the Board of the eligible entity to petition for adequate representation.

The State requires that the Board Chairperson or Executive Director of each eligible entity inform the OEO, in writing, of any changes to the Board of Directors, to include new members, rotations and/or resignations, current member data (addresses, telephone numbers, etc.), within thirty (30) days of the change. Community Based Organization Board of Director's Membership Form is included as Appendix I.

Failure to adhere to Federal and State requirements on Board compliance could result in the withholding of CSBG funds.

In accordance with the CSBG Act, the State will give special consideration in the designation of local community action agencies to any community action agency which received funds under any Federal anti-poverty program on the date of enactment of the CSBG Act, except that:

1. Before giving such special consideration, the State shall determine that the agency involved meets program and fiscal requirements established by the State; and
2. If, as a result of any change in assistance furnished to programs for economically disadvantaged persons, the State shall give special consideration in the designation of community action agencies to

any successor agency which is operated in substantially the same manner as the predecessor agency which did receive funds in the fiscal year preceding the fiscal year for which the determination was made, including Faith-Based Organizations (FBOs).

For the 2016 Program Year, only those community action agencies funded in PY 2015 under the CSBG Program shall be eligible to apply for the PY 2016 CSBG funds. However, the 5% discretionary funds are not subject to this limitation. Those agencies must satisfy all criteria and requirements established in the State Plan and all other existing rules and statutory guidelines or regulations issued by the OEO. The Federal legislation establishing the policy for states to follow in determination of eligible entities will prevail. The State may, based on interpretations of such legislation, alter the designated agencies or designated service areas.

E. ELIGIBILITY REQUIREMENTS

1. Income Eligibility

The Federal Poverty Guidelines **must** be used as the primary criterion in determining income eligibility. In order to receive assistance under any CSBG project involving direct services, an applicant's total household income must not exceed 125% of the poverty level. Household is defined by the Bureau of Census as consisting of all persons who occupy a housing unit (i.e., house or apartment), whether they are related to each other or not. Total household income is based on income at the time of application.

Total household monthly or annualized gross income should be used to determine eligibility. The monthly income should be calculated for the thirty (30) day period preceding and including the date of application. The SC ROMA system is designed to calculate income accurately based on 4 pay check amounts. When using a paper application, use only the 4 prior pay check gross amounts, add them together, divide by 4, then multiply by 4.33 to get the accurate 30 days of income (each check copy must be in file; therefore, you may not use a check twice if one check is missing). In an effort to assist as many households/individuals as possible, the annual income should be calculated either for the past 12 months, last 30 days, including date of application, times 12 or last 180 days times 2.

The purpose of the income determination is to establish an individual's eligibility for services in accordance with the statutory definition of poverty level. The goal is to implement program services that will enhance and promote self-sufficiency, and not to penalize low-income persons as they move from poverty to self-sufficiency. The OEO shall allow determination of eligibility to be based on total household income according to Federal Poverty Guidelines.

USE FOR CSBG SERVICES: COMPUTED AT 125% OF 2015 POVERTY GUIDELINES

FAMILY SIZE	125% MONTHLY *POVERTYGUIDELINES*	125% ANNUAL POVERTY GUIDELINES
1	$1,226.04	$14,712.50
2	$1,659.38	$19,912.50
3	$2,092.71	$25,112.50
4	$2,526.04	$30,312.50
5	$2,959.38	$35,512.50
6	$3,392.71	$40,712.50
7	$3,826.04	$45,912.50
8	$4,259.38	$51,112.50
For each additional person, add	$ 433.33	$ 5,200

This schedule has been adjusted based on the Federal Poverty Guidelines currently in effect. This information is based on the 2015 Federal Poverty Guidelines.

The Subgrantee shall be responsible for determining the eligibility of each applicant. Self-certification will be permitted, provided there is complete written information in the client file about the applicant household, confirming efforts to obtain documentation from former employers, the client, and other social service agencies. The "Zero Income Certification" (OEO Intake Form) must be signed by applicants reporting zero income and/or individuals living in the household who are 18 years or older reporting zero income.

Please note, the current DSS printout **may not be used to verify earned nor unearned income**; however, it may be used to verify utility check and TANF amounts if listed on the printout.

Proof of income verification (i.e., a copy of a check or statement from the employer confirming the amount of income received for the thirty (30) days preceding and including the date of application) must be included in the client record/file, along with proof of identification for applicant (copy of driver's license or government-issued pictured ID card and copy of Social Security card). Social Security cards are required for all household members.

2. Program Eligibility

After an applicant has been determined to be income eligible, program eligibility must be established in accordance with the State Plan, the Subgrantee's approved CSBG Work Plan, and/or Federal and State laws, policies and procedures. If agency employees, board members, and/or family members of employees and/or board members apply for CSBG services, the Executive Director must approve the application and payment voucher in writing, before the service(s) is provided. Agency staff cannot prepare applications for family member. The "State Community Services Program" section of this plan contains the program eligibility requirements for GEAP.

F. PROGRAMMATIC ASSURANCES

➢ The OEO shall ensure that services and activities are implemented to assist low-income persons, including the poor, in the following areas as set forth in Section 676(b)(1) of the Act:

- *To remove obstacles and solve problems which block the achievement of self-sufficiency*;
- *To secure and retain meaningful employment*;
- *To attain an adequate education*;
- *To make better use of available income*;
- *To obtain and maintain adequate housing and a suitable living environmen*t;
- *To obtain emergency assistance to meet immediate individual and family needs;*
- *To achieve greater participation in the affairs of the community*;
- *To address the needs of youth in low-income communities; and*,
- *To make more effective use of other programs related to the purposes of the CSBG Act*.

Through the Community Services Program, the OEO shall further ensure that activities are implemented which shall serve to:

- improve the conditions in which low-income people live;
- allow low-income people to own a stake in their community; and
- strengthen agency capacity for planning and coordinating the use of a broad range of Federal, State, local and other assistance, to include private resources.

The State Community Services Program shall be comprised of the following four components:

1. Local Initiative Projects

Eligible Entities shall be required to use no less than 82.5% of their formula allocation for local initiative projects. Local initiative projects shall include those services and activities which address the anti-poverty goals as set forth in Section 672 of the CSBG Act and may include projects in the areas of employment, education, income management, housing, nutrition, or other areas in which there may be obstacles which impede the attainment of social and economic self-sufficiency by low-income persons. The specific projects for a given service area shall be determined by the local community action agency through a community needs assessment process. Therefore, anti-poverty strategies shall be based on locally defined needs and must involve services which are based on a community's own analysis of the poverty related problems.

2. General Emergency Assistance Program (GEAP)

The General Emergency Assistance Program is intended to be used for emergency assistance, not for staffing. Therefore, the 7.5% mandatory GEAP allocation, which is calculated using the total State's allocation, must all be designated in the budget in the client assistance line item. The budget for GEAP should reflect zero for staff costs.

Each eligible entity is required to establish a General Emergency Assistance Program (GEAP). The purpose of this project is to assist low-income persons in meeting the emergency needs **(within 72 hours or sooner, whenever possible)** which are confronting them.

Assistance provided under this activity must address the emergency needs of a household to obtain or purchase food, clothing, medical services, payment of rent, mortgage payments **including taxes and insurance**, repairs to home heating or cooling devices and **the purchase of heaters (space heaters not allowed), appliances and/or furniture.**

The General Emergency Assistance Program must be operated by the Subgrantee and may not be subcontracted.

Assistance Level

The amount of GEAP assistance provided any household cannot exceed **$1,000** per program year unless authorized by the Executive Director with proper documentation justifying the need and being maintained in the client's file. While GEAP assistance can be provided to an eligible household more than once during the program year at the agency's discretion, the total cumulative amount provided to a household during the program year cannot exceed the maximum assistance amount and priority should be given to those who have not been served before or within the past 24 months. The actual amount of assistance authorized for any household will be determined by the Subgrantee, on a case-by-case basis, and must not exceed the amount necessary (cannot exceed actual bill amount) to meet the particular emergency need presented by the applicant. Any amount authorized well below the OEO-approved maximum for eligible households must not generate additional obstacles for clients (e.g. having to locate the balance from several additional providers). The agency must be able to provide, in client files, evidence of its efforts to coordinate the additional area services to ameliorate the current emergency need of the client.

An applicant's household may be served during the period January 1, 2016 through December 31, 2016.

In the instance where a client's financial need to pay for the emergency exceeds the agency GEAP maximum or the OEO GEAP maximum of **$1,000**, documentation must detail how the outstanding balance is going to be paid. If the client will be receiving funds from another human service provider or if the vendor agrees to a payment arrangement, this must be documented in the client's file along with written commitment from the agency. If the customer or another person makes payment for the balance, the payment receipt must be retained in the customer's file.

The OEO emphasizes that two requirements must be met for GEAP assistance to be rendered: **income and program eligibility.**

Program Eligibility Criteria for GEAP

To be eligible for this project, the total household income may not exceed 125% of the poverty level and the circumstances which created the need for emergency assistance must have occurred not more than 30 days before the date of application.

The Subgrantee is responsible for determining the eligibility of each applicant. Self-certification will be permitted for zero income, providing the Subgrantee inserts complete written information in the client file about the applicant household, confirming efforts to obtain documentation from former employers, the client, and other social service agencies, along with a DSS printout and/or UI printout.

In addition to income eligibility, the client must also be program eligible. Eligibility for assistance under this program requires that a temporary financial emergency has occurred in the client's household. **A client is program eligible if any one of the following is satisfied.**

Types of Temporary Financial Emergencies include, but are not limited to:

a. **Sudden Reduction of Household Income**

The primary wage earner has either been terminated or received a reduction in hours/pay from employment, died or become disabled.

b. **Emergency Assistance for Shelter**

The client dwelling is burned or damaged by an Act of God to the extent it is uninhabitable; or the family faces displacement by eviction notice; or eviction has actually occurred and the family requires immediate temporary shelter overnight until other appropriate housing accommodations can be obtained or arranged**. If rental assistance is provided, a copy of the current lease agreement, including the names of all persons living in the residence, is required.** Assistance with temporary shelter requires the coordination of other human service providers to comprehensively address the client's needs. This coordination is to be well documented in each client's file.

c. **Emergency Medical Services**

If a household meets the income test, payment for medical, hospital or physician services is allowed, excluding Medicaid eligible. A client may need medication without which they may be faced with a life-threatening situation. Medicaid recipients must document that they have exhausted their three prescriptions per month limit and do not have the financial ability to purchase needed medications. CSBG funds must supplement but not supplant existing Federal and State funds for same. If the physician states in writing that there is a medical emergency, assistance may be provided. Additionally, an official prescription to include the cost is sufficient evidence of a medical need.

d. **Emergency Assistance for Repairs/Replacement to Home Heating and Cooling Devices**

Clients are eligible if the condition of the household home heating or cooling device is such that immediate minor repairs are required to protect the health and well-being of the household. If a client is income eligible, and repair of the heating or cooling device is necessary to protect the health and well-being of the household,

service may be provided. If repair of the household home heating or cooling device is not cost effective, a heater or air conditioner may be purchased; however, HVAC system replacement (Manual J Calculation required) should be coordinated with LIHEAP to ensure adequate funding and must be approved in the agency Work Plan if using any CSBG funds.

e. Emergency Assistance for Purchase of Appliances and/or Furniture

If the client dwelling is burned or damaged by an Act of God to the extent it is uninhabitable or if a homeless client has secured adequate housing and needs appliances and/or furniture, appliances and/or furniture may be purchased. This assistance requires the coordination of other human service providers to comprehensively address the client's needs. This coordination is to be well documented in each client's file along with a dated fire report, weather report outlining damaged areas in the county or proof of homelessness to justify the emergency prior to the provision of the assistance/service.

f. Emergency Assistance for Utility Payments (only use when Project Share and LIHEAP funds have been exhausted at the end of the Program Year)

Clients must present a notice of termination from the utility provider which includes the date of termination of services. If the client is income eligible, to protect the well-being of the household, and prevent termination of services, assistance payments may be provided. The Subgrantee must coordinate service delivery with the Low-Income Home Energy Assistance Program (LIHEAP) when appropriate to fully address the client's energy needs.

g. Mortgage Payments

Mortgage assistance, including taxes and insurances, will be allowed at a maximum of $1,000 during the program year. To receive this assistance, clients must provide clear documentation of an emergency and must prove they can sustain once the assistance is provided (proof that income is sufficient to cover the mortgage and other bills monthly). **Monthly follow-up is required for mortgage assistance and must be documented in the customer's file for a minimum of three months following the service**. Assistance with mortgage payments requires the coordination of other human service providers to comprehensively address the client's needs. This coordination is to be well documented in each client's file.

h. Other Conditions not Categorized Above

Program eligibility not specifically addressed above should also be established by the Subgrantee in the Work Plan. Other conditions not categorized above would allow a local agency to define other emergencies that would make a client program eligible. Documentation must be present regarding the rationale for considering the situation an emergency, for example, a lack of clothing (receipt required) in the household or a lack of food (food policy outlining amount provided to a household based on the number of people in the household required and receipt required).

Program eligibility must be determined in accordance with the State Plan and any other State guidelines pertaining to criteria for eligibility.

Coordination

The General Emergency Assistance Program shall be coordinated with other human service agencies and units of local government to strengthen coordinating capabilities, facilitate the exchange of client information, and to better address the total needs of the clients.

Contact with other agencies is necessary to ensure that the client's problems are sufficiently addressed and properly resolved. These contacts must be documented to demonstrate that attempts to avoid duplication of assistance have occurred.

Coordination among agencies will establish a formal mechanism for following-up on clients, and also eliminate the possibility of a client receiving multiple services when it is not needed.

Funding

The funds to be used in the GEAP project for PY 2016 are:

a. Seven and one-half percent (7.5%) of the total CSBG grant distributed by the OEO to eligible entities;
b. Any funds that would normally be a part of Outcome Statement 1 funding, but due to rejection of projects submitted by eligible agencies, the OEO has directed use in GEAP for PY 2016; and
c. Any "Outcome Statement 1" funds an eligible entity may choose to use in the project.

The OEO will reject any GEAP project which contains staff costs.

3. State Discretionary Projects: Youth Leadership Program, Technology Support and State CAP Association

In accordance with Section 675C(b), the State will use Discretionary funds to make grants to community action agencies for the purpose of supporting locally-operated youth leadership programs.

- ***Youth Leadership Program (YLP)***

In PY 2016, in compliance with section 676(b)(1)(B), the State's Youth Leadership Program (YLP) will provide income-eligible elementary, middle and high school students educational opportunities targeting individual improvements in academic, behavioral and social achievement, resulting in increased self-sufficiency. Students who complete the program will be able to describe how good character aids in the attainment of their goals, emotional health and healthy relationships. Students will be able to demonstrate critical thinking skills, decision making and problem solving skills.

Youth in low-income families can achieve success; statistically they are at an unquestionable disadvantage. They are most often likely to remain poor, never finish school, and experience negative outcomes. In PY 2016, YLP will provide innovative activities in the areas of personal development and character building, leadership skills, educational achievement, career exploration, and civic responsibility.

YLP best practices include family participation and broad-based community coordination, coordination that includes community action agencies, public schools, representatives of the public and private sector, the faith community, key area leaders and elected officials. Among the best practices identified in the program component are those that include reading enhancement, community volunteer services, financial planning, life skills, parliamentary procedures, employment skills training, and exposure to viable post secondary educational opportunities.

Public school (Local Education Agency or LEA) involvement is a recommended component of the Youth Leadership Program. Files are to contain evidence of this commitment in goods, services, cash or facilities, if applicable.

Project Start-Up and Compliance

Year long projects should commence no later than February 1, 2016 (30 days after grant period begins). Subgrantees should notify OEO in writing prior to this date if there is a problem with project start-up. If there are extenuating circumstances prohibiting project start-up, agencies should notify the OEO of these circumstances. Failure to make a reasonable attempt to meet this requirement may result in YLP funds being returned to OEO no later than March 1, 2016 for redistribution to other eligible entities or other YLP expenditures. This requirement does not apply to agencies that have approved work plans containing specific time frames for Youth Leadership projects (i.e. summer projects, etc.).

Subgrantees must implement viable activities within thirty (30) days of the executed grant agreement. Those activities should be designed to expand existing resources and address needs currently not being met and yield the greatest service benefits relative to the resources invested. Objectives, program evaluation and student assessments are required and must provide for clear documentation of the benefit derived by income-eligible students.

In an effort to reduce staffing costs, YLP staff, excluding full-time agency staff, may be obtained on a contractual basis.

At least 40% of the YLP allocation should be expended by June 30, 2016, unless the agency approved work plan delineates a different expenditure schedule. Otherwise, the OEO may require that the unexpended balance of the 40% be returned to OEO along with the July 15, 2016 FSR. Subgrantees that fail to create a viable YLP in the 2015 program year may not be eligible for YLP funds in PY 2016.

Equipment

All equipment to be purchased with YLP funds must be required to conduct the project. A written justification must be included for each item (for equipment instructions, refer to OEO Fiscal Manual). The applicant organization must not already have the same equipment or a reasonable facsimile available to the project. Justification, along with an

explanation for the future use, is required in the grant application if an agency plans to retain the equipment, and OEO approval is mandatory. Vehicle purchases are unallowable.

Requirements - Documentation for Program Activities, Student's File, and Audits
The Youth Leadership curriculum, Character Counts, must be incorporated into the agency's discretionary youth project. In addition, the following is a list for the YLP program that each agency should consult as applicable for their specific program to ensure compliance with State and Federal program guidelines:

- Each student must complete an application **each year** for enrollment to determine/verify eligibility.
- Provide a master list of eligible recipients entering the YLP program, include date enrolled, date completed or date and reason the student discontinued the program. All youth leadership programs are required to enroll at least 15 participants representing ethnic/racial composition of the low-income communities served.
- Completed SC ROMA Application Requirement: Document that each eligible student qualifies as an economically disadvantaged recipient by verifying student's household is within the CSBG income guidelines. Document each student's post-assessment with actual outcomes (i.e. personal and academic achievements, improvements in life skills).
- A Pre and Post Assessment must be documented in each student's file. The Pre Assessment is to be completed upon a student's acceptance/enrollment to YLP.
- Document each student's attendance with attendance logs, including the student's signature, date and time in attendance, with the coordinator's signatures and date.
- Document each scheduled workshop with coordinator's activity report, include in the report, the date, time and place of each workshop, activities performed, and coordinator's signature and date.
- Reconcile the attendance log for snacks or meals provided to students (excess billing of snacks or meals should be reimbursed from agency funds).
- Document field trips with attendance logs, costs, and activity report signed and dated by the coordinator.
- Document luncheon activity and persons in attendance with payment responsibility and funding for all costs associated with the luncheon activities designated to one agency.
- Document supplies or other materials distributed with student's signature, date and purpose of activity.
- Stipends and staff training: OMB Omni Circular states, "Participant support costs are direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with meetings, conferences, symposia, or training projects. These costs are allowable with the prior approval of the awarding agency."

  The OEO agrees to allow stipends and/or paid internships that are directly related to the purpose and strategies of the CSBG grant program. All proposed stipends for CSBG programs must be sent to OEO in writing, clearly justifying the stipends relative to the programs' success (e.g. Employment Skills Training/Internships). OEO will send a written notification of approval for the stipend. Each participant's file must provide adequate documentation to support these expenditures.

  Participants must not be paid simply for participating in the program or attending classes.

  The following information must be submitted to OEO for approval if **stipends** are being charged to CSBG:

1. Identify eligibility criteria
2. Define who's eligible
3. Explain how you arrived at the stipend figure
4. Explain why the stipend is being offered (stipends are allowed for childcare, transportation, or time lost from a job to attend sessions and must be justified with receipts)

  The following information must be submitted to OEO for approval if **internships** are being charged to CSBG:

1. Must be outlined in agency's policies and procedures manual (copy required with Work Plan)
2. Identify eligibility criteria
3. Define who's eligible
4. Explain how you arrived at the hourly rate
5. Memorandum of Understanding is required between agency and employer and must include termination policy (termination should occur as soon as possible if internship is not working appropriately)
6. 1099 Forms must be provided to each student receiving more than a total of $600 per year for income tax purposes and tax regulations must be adhered to

  The OMB Omni Circular emphasizes that staff training and education costs are allowable expenditures. To be approved, OEO requires the agency must demonstrate that all staff training and education costs are directly

related to the program requirements and are designed to increase the employee's effectiveness within the program.

<u>If these processes are not followed, the expenditures will be unallowable and will be an audit finding.</u>

- Ensure that each household provides a signed disclosure authorization form for all income sources (see Appendix N).

Subgrantees must expend all YLP grant funds during the period January 1, 2016 – December 31, 2016. All unexpended Youth Leadership Program funds and State CAP Association funds must be remitted to the OEO at the closeout of the grant period (by February 15, 2016 along with the final FSR).

Youth Leadership Programs should include coordination and collaboration with organizations in the private and public sectors to achieve the statute's goal of increased community involvement to eliminate the causes/impact of poverty.

The expectation is that these funds will be increased by private sector contributions through Subgrantee program designs. Projects will be funded only for the 2016 program year and shall conclude at the appropriate time based upon the operational timetable established and approved in the Work Plan. An audit will be conducted in accordance with OEO audit policies.

The Youth Leadership Program, must comply with the quarterly and annual reporting requirements of ROMA (Results-Oriented Management and Accountability System) pursuant to Section 678E, using the ROMA Report Form (Appendix L). A description must be provided of specific measures to be used to substantiate the outcomes of each funded program and eligible entity's performance in promoting self-sufficiency, family stability, and community revitalization.

- **<u>Technology Support</u>**
  A portion of CSBG funding will be utilized in PY 2016 to facilitate ongoing training, maintenance and language development of the SCROMA (South Carolina Results-Oriented Management and Accountability) client management system. The system utilizes the power of the Internet to facilitate the collection, sharing, analyzing and reporting of client information across multiple users, programs, agencies, and their funding sources – efficiently, securely and in real time.

  Funding will also be utilized to explore options to improve efficiency, output, and system expansion to include linkages with other human service agencies in order to maximize the effectiveness of projects in the local service area.

- **<u>SC Association of Community Action Partnerships (SCACAP)</u>**
  A portion of CSBG discretionary funding will be awarded to the SCACAP in PY 2016 for the purpose of building the capacity of the state association to assist in addressing the concerns and impact of poverty in South Carolina. The allocation shall be used to offer collaborative trainings, develop a communication plan, enhance public awareness and increase visibility to bring the issues of poverty to the forefront to affect change and develop workable collaborative solutions on the state and community levels. Funds will also be utilized for statewide youth leadership initiatives.

4. **<u>Community Food and Nutrition (if applicable)</u>**
The State of South Carolina hereby submits its application for the PY 2016 Community Food and Nutrition (CF&N) Program.

The State will undertake statewide activities, either at the State level or through subgrantees, to include existing CSBG eligible entities, food banks, and/or meals on wheels in concert with councils on aging.

Services will be provided to low income persons in each of the state's forty-six counties, employing at least one of the following legislatively mandated program purposes:

(a) to coordinate private and public food assistance resources, to better serve low-income populations;
(b) to assist low-income communities to identify potential sponsors of child nutrition programs and to initiate such programs in under-served or un-served areas; and
(c) to develop innovative approaches at the State and local levels to meet the nutrition needs of low-income individuals.

The following assurances will be adhered to:

(a) that Community Food and Nutrition funds awarded by the State to any public or private agency will be used to support the legislatively designated purposes;
(b) that funds will be used for sub-grants to eligible agencies to support programs that are statewide in scope and represent a comprehensive and coordinated effort to alleviate hunger within the State;
(c) that funds will be subject to the annual audit requirements under the Single Audit Act of 1984, Public Law 98-502 and the Office of Management and Budget Circular A-133; and
(d) that the State will comply with Departmental reporting requirements and general requirements for the administration of grants under 45 CFR Part 92.

A final annual Financial Status Report will be submitted and shall constitute the final report, unless other information is requested. A final report of the State's programs, describing the subgrantee recipients, the goals of the state's projects, the purposes for which the funds were expended, and the extent to which the project goals were met, will be submitted.

G. CSBG CLIENT ASSISTANCE PAYMENTS

Each check and/or voucher must be made payable only to the vendor from whom the applicant proposes to obtain services. Priority for service will be determined by need, based upon the agency's approved Work Plan, and will be provided only so long as funds exist in an agency's budget for client assistance. Payments made to vendors on behalf of clients using CSBG funds must be made by either a two-party check or OEO-approved two-party voucher system. The two-party voucher system must meet OEO guidelines and be approved by the OEO prior to implementation.

The voucher/check used for the purpose of direct client (monetary) assistance shall be documented as follows:

- CAA's (Subgrantee) name as payer
- Vendor's name as payee
- Eligible applicant's name as recipient

H. COORDINATION

In PY 2016, the State will require the coordination between programs in each community, where appropriate, with emergency energy crisis intervention programs under Title XXVI of this Act (relating to Low-Income Home Energy Assistance conducted in such community), and Title VI of the Human Services Reauthorization Act of 1984 (PL 98-558).

The coordination of these programs will be carried out at the local level and approved by the OEO. As the State administering agency for the Low-Income Home Energy Assistance and Community Services Block Grant Programs, the OEO shall, through grants with Subgrantees, require a cross-referral of participants in both of the above-mentioned programs to further provide the opportunity for eligible households to participate in these and other agency services for comprehensive case management to enhance client outcomes.

Subgrantees shall also be required to provide documentation, to include details of what the collaboration will provide, of their coordination with other human service organizations and units of local government in each county of its service area in implementing anti-poverty strategies and preventing the duplication of services. The OEO shall evaluate and ensure coordination with these entities through the project approval process, as well as through on-site monitoring activities, client interviews and file documentation.

III. OEO GRANT MANAGEMENT SYSTEM

A. FISCAL ACCOUNTABILITY

In accordance with Section 678D, the State of South Carolina has established fiscal controls and fund accounting procedures to assure the proper disbursal of all federal funds received by the state. Additionally, the state has established procedures for monitoring the utilization of such funds by Subgrantees. The payment schedule for disbursements is outlined in OEO Fiscal Guidance Manual at www.oepp.sc.gov/oeo.

A description of the controls and procedures to be implemented is as follows:

1. The OEO will follow the State's established fiscal policies and procedures. To accomplish this, the OEO will coordinate these policies with various other branches of state government, including but not limited to: the Budget and Control Board, the Office of the Comptroller General, the General Services Division, the State Treasurer's Office, the State Auditor and other units of the Governor's Office. Financial areas addressed in these procedures consist of fiscal management controls, the accounting system, fund controls, personnel and payroll management, property management, procurement, and the disbursement of funds.

2. The financial standards set forth by the state establish an adequate accounting system with appropriate internal controls which will safeguard assets, check the accuracy and reliability of accounting data, promote operating efficiency and encourage compliance with prescribed management policies.

B. AUDIT REQUIREMENTS

The threshold for Single Audit requirement increased to $750,000 *§ 200.501*. The OEO will ensure that audits of Subgrantees expending $750,000 for federally funded programs, activities and services associated with CSBG will be performed in accordance with the new OMB OMNI Circular. OEO will ensure that field audits and the desk audits of independent single audits are conducted in compliance with the above regulations.

Refer to OEO Fiscal Guidance Manual.

C. MONITORING PROCESS

To assure the accomplishment of program outcomes and grant compliance, the OEO will monitor each Subgrantee a minimum of one time per three program years. Monitoring visits will be scheduled and confirmation letters will be forwarded within two weeks of the scheduled visit with the Subgrantee and conducted by OEO program staff (the CSBG Monitoring Instrument will be forwarded to each agency prior the visit). Monitoring will include a review of client files, year-to-date reporting, year-to-date achievement of outcomes and milestones, collaboration, Board minutes and Board membership rosters. Site visits may also be conducted. If requested materials are not made available to the reviewer(s) upon arrival, the Subgrantee may be responsible for bringing those materials to OEO for a repeat visit (refer to CSBG Program Memorandum C 03-05). The Subgrantee will be briefed on the observations and/or findings generated by the monitoring during the exit interview. Additionally, training and technical assistance may be provided during the monitoring visit or upon request. The OEO may also conduct monitoring through a team visit.

The teams or individuals visiting Subgrantees will prepare a summary of the field visit and Monitoring Report (MR) upon return to the OEO. Subsequently, a letter and a copy of the MR will be forwarded to the Subgrantee, with a copy to the Chairman of the Board of Directors, and will address any deficiencies identified during the field visit. (Copies of the MR will be forwarded to the entire Board of Directors when there are major issues to be addressed.) Each Subgrantee will have a specific period of time to correct the deficiencies identified, if applicable. Major findings will be tracked by OEO to final resolution. Uncorrected deficiencies may result in contract suspension or possible termination in accordance with established policies, as outlined in Section II. C., of this State Plan.

The OEO shall also conduct follow-up on concerns regarding CSBG funded activities that are received from CSBG service recipients and/or other concerned community members.

D. INVESTIGATIONS

The State, OEO and Subgrantees will permit and shall cooperate with federal, state and local authorities and investigations undertaken in accordance with Section 678D(b)(3) of the CSBG Act.

E. SEMI-ANNUAL AND INFORMATION SYSTEMS (IS) REPORTING

A Semi-Annual Narrative Report must be provided to OEO no later than July 15, 2016, along with the 2nd quarter ROMA Report, and focus primarily on the agency outcome statements and performance targets of the current CSBG Work Plan. Evaluation is a required component of overall CSBG project management:

Semi-Annual: This narrative is to assess and capture the progress of the first six months (year-to-date) of the current year. This report will only require the use of the OEO Milestone Narrative Report for each performance target and activity/milestone – when "actual", compared to "projected", varies by more than 20% (+/-). Once identified, each objective and milestone is to be modified to improve effectiveness and benefits to low-income customers. Current course corrections and/or strategies are to be revised and recorded on the Milestone Narrative Report (Appendix J). Each evaluation should involve all applicable agency management, program and fiscal areas.

Information Systems (IS): Eligible entities will comply with accurate completion and timely submission of the CSBG IS Annual Report. The CSBG IS Annual Report is administered by the National Association for State Community Services Programs (NASCSP) and supported by the U. S. Department of Health & Human Services (DHHS), Office of Community Services (OCS), and is a requirement for all eligible entities in receiving CSBG funding.

CSBG funding allows eligible entities to more fully support their institutional operations for the purpose of enacting initiatives to change conditions that perpetuate poverty, especially unemployment, inadequate housing, poor nutrition, and lack of educational opportunity. In this regard, the annual CSBG IS Report is designed to capture significant data concerning agency coordination and annual achievement, customers, resources, and services. The report encapsulates all

community action efforts made possible and broadened as a direct result of CSBG funding and is to be inclusive to all of the agency's initiatives and programs during the yearlong reporting period.

F. POLICY GUIDANCE

The OEO shall periodically issue instructional memorandums to Subgrantees detailing and/or clarifying policies, procedures and other requirements associated with the operation of the State Community Services Program.

G. TRAINING AND TECHNICAL ASSISTANCE

The OEO shall provide training and technical assistance as needed to Subgrantees on CSBG-related issues.

H. TENTATIVE TIMETABLE: SUBMISSIONS FOR PY 2016 CSBG FUNDS (OUTCOME STATEMENTS 1, 2 & 5)

Date:	**OEO Activity:**
June - July 2015	*The OEO prepares the CSBG State Plan.*
July 2015	*The State CSBG Plan is submitted for review for the mandatory Public Hearing to the community action agencies.*
August 12, 2015	*Public Hearing (Federally required) on PY 2016 CSBG State Plan.*
August 28, 2015	*Eligible organizations must submit PY 2016 CSBG Work Plan and Budget, including emergency assistance and youth leadership projects, to the OEO.*
By September 1, 2015	*The OEO submits the final 2016 CSBG State Plan to the U.S. Department of Health and Human Services, Office of Community Services for approval*
November 2015	*The OEO will complete review of all CSBG Work Plans and Budgets and advise all agencies of the outcomes individually by project.*
By December 6, 2015	*The OEO will issue Grant Agreements for approved CSBG project activities for the period January 1, 2016 through December 31, 2016.*
January 2, 2016	*Grants commence if Federal funds have been provided. First allocation of funds for individual projects will be released provided all eligibility obligations have been met.*
March - November 2016	*The OEO monitors Subgrantee compliance with Grant Agreements and project outcomes; instructions; policies and federal and state legislation. Funds will be released to Subgrantees based on the Cash Management Act, Federal regulations, and State/OEO requirements.*
	*Final ROMA Report with **Actual Results** section completed (using Appendix K) due to OEO*
February 15, 2016	*PY 2015 IS Annual Report due to OEO*
July 16, 2016	*PY 2016 Semi-Annual Narratives due to OEO using Appendix J (refer to Section III, E of this Plan for instructions)*

This timetable is subject to revision depending on the availability of Federal funds that could alter release of funds. Actions on Work Plan approval by the State or Federal government could affect implementation.

IV. PY 2016 APPLICATION PROCESS

A. WORK PLAN/APPLICATION DOCUMENTS AND PROCEDURES

Subgrantees shall prepare the annual 2016 CSBG Work Plan/Application in the format described using the various OEO application forms. Copies of Letters of Endorsement and Support relative to Subgrantee's proposed activities are to be included.

Standard Detailed Format:
Applicants must submit one (1) unbound complete original and three (3) complete copies of the following information in subsequent order and placed in 3-ringed tabbed notebooks/binders:

1. OEO Checklist
2. A Cover Sheet and Executive Director's Introductory Letter
3. OEO Form 507 - Entity Identification indicating all current year funding sources (use only OEO Form 507 last revised 06/04)
4. OEO 509 Narrative – Subgrantee Financial Capability Survey
5. Current Needs Assessment for PY 2015 and copy of assessment instrument
6. OEO 511 Outreach Narrative
7. OEO SC ROMA Logic Model
8. Logic Model Narrative – Subgrantee Project Description
9. Budget Forms
10. Budget Narratives
11. Annual Equipment Budget
12. Current IDC Rate
13. Agency Organizational Chart
14. Current Agency Mission Statement - required if revised within the last year
15. Board Minutes or OEO Board Approval Form **approving** agency's CSBG **Work Plans and Budgets** (Must be signed by the Board Chairman or Board Secretary)
16. Copies of current Letters of Endorsement and Support/MOUs (OEO Form 594 is strongly recommended) from private and public resources, including units of local government (must be relative/applicable to project type and must clearly indicate specific roles(s) of collaborating agencies to ensure prevention of the duplication of services)
17. Copy of current Fidelity Bond and copy of the cancelled check
18. Current Board Roster (including updated Community Based Organization Board of Directors Membership Forms – OEO Form 500 dated 1/06)
19. Current Board By-Laws
20. Current Independent Auditor's Report or letter from auditor stating projected completion date
21. Current Policies and Procedures
22. Current Accounting Manual
23. Current copy of the charter from the Secretary of State if a private non-profit organization or a copy of the legislative act if public
24. Other Required Documents

Detailed application procedures and copies of application forms are contained in Appendix B.

B. PROJECT REVIEW AND APPROVAL PROCEDURE

All proposed projects will be reviewed to determine acceptability for funding and feasibility for outcomes and proven history of success in achieving outcomes. Preciseness and clarity of information in the application is essential. Clear measurable results that are identifiable and proven are important to determine project impact. Projects will be reviewed using the following factors: (See Outcome Statement 1)

1. A PY 2016 Needs Assessment summary is present and well documented; evidence of community involvement per ratio of eligible populations.
2. Priority problem areas are clearly identified within the Needs Assessment and are supported by current statistical data (Please be reminded that the Needs Assessment is to be the foundation for the formation of the agency's CSBG program).
3. Problem areas clearly identified and stated, to include:
   a. Causal nature;
   b. Targeted population and characteristics of affected persons.
4. Each outcome statement reflects a broad result in the problem that is to be achieved (must be tied to Needs Assessment) and,
   a. Each outcome statement relates directly to the problem;

b. Each outcome statement is realistic and specific enough to be achieved and measured.

5. Performance targets and activities/milestones
   a. Are the project performance targets consistent with the outcome statement?
   b. Are the project performance targets quantifiable and measurable?
   c. Are the major activities/milestones clearly stated and do they logically lead to the outcomes?
   d. Are objectives for major activities identified with completion dates?
   e. Are the objectives consistent with:
      (1) Performance necessary to achieve the outcomes?
      (2) Level of funding requested? (e.g., cost per unit result, per $1 expended)
   f. Does each objective take into account start-up time for new projects?
   g. Has this type of project and/or this applicant agency had a history or pattern of performance problems?
   h. Are the measures of the objective(s) and outcomes such that data can be readily gathered?
   i. Are all the projects proposed eligible for CSBG funding?
6. The project clearly indicates the role of the private and public sector entities that are to participate in project operations.
7. The project clearly indicates the role of state and local governmental agencies in the service area that will participate in project operations.
8. Other services, similar to the project design, are identified within the service area so it can be determined if the project is necessary, that is, the only service; or if it is supplemental or unnecessary and duplicative.
9. The expected duration of the benefits or services the project can provide is identified.
10. The ratio of funds to persons assisted can be determined from project materials.

Failure to meet any one of the 10 above-identified rating factors may be cause for project rejection.

PY 2016 Work Plans must be submitted to arrive at the OEO no later than Friday, August 28, 2015.

The OEO will complete review of all projects by November 30, 2015. Each agency will be advised in writing of project approval or rejection. The OEO may issue conditional approval status to projects pending resolution of outstanding issues. Applicants will have a complete explanation of deficiencies provided for each rejected project.

Providing funding is available, approved budgets and projects will be authorized to commence January 1, 2016. Such projects will be identified in the grant agreement when it is issued. Projects submitted for first time funding in PY 2016 may be planned for two years of operation. However, since the OEO will provide approval and one year funding for one planning period at a time, objectives and activities in the application documents should be specified for one planning period at a time. If the project submitted for PY 2015 covered a two-year planning period, the OEO will fund a second year of project activity provided all criteria for continuation are met, and that each year shall operate independent of the other and the board minutes are forwarded to OEO in the manner of 2015 year approval.

In the event a project is rejected, the submitting organization shall have thirty (30) days to revise and resubmit. A new project design may be used as a replacement for the rejected projects. The amount of funds contained in resubmitted projects shall not exceed the sum of the rejected amounts. The resubmission must be sent to and be received by the OEO within thirty (30) days of the OEO's rejection notification to the submitting organization unless otherwise authorized by the OEO. Any resubmissions received after this thirty (30) day time period will be rejected and all unobligated service area CSBG funds will be converted to the General Emergency Assistance Program.

The OEO will complete review of resubmitted or redesigned projects not later than thirty (30) days from the date of resubmission. The OEO will act on each project separately. Each agency will be advised in writing of approval or rejection. Agencies will be provided a complete explanation of deficiencies for each rejected project.

Prior to release of CSBG funds, the OEO will prepare a written grant agreement, which will set forth the terms and conditions under which the Subgrantee agrees to operate and expend CSBG funds. **Each Subgrantee approved to receive PY 2016 CSBG funds must have an approved Work Plan and Budget and have an executed Grant Agreement before funds will be released.**

In addition, at all times during and prior to each new funding period, the Subgrantee must be in full compliance with the terms and conditions of the CSBG grant, including all reporting requirements, have approved budgets, and satisfy all policies. If not, funding may be suspended which could lead to termination of the grant.

C. POLICY ON REJECTED PROJECTS

The OEO will act on projects separately. If approved, implementation will commence in accordance with project schedules, but not before January 1, 2016 nor extend beyond December 31, 2016. Implementation may commence on a conditionally approved project while deficiencies are being resolved upon authorization from the OEO. Rejected projects shall have all sums associated with them converted to the General Emergency Assistance Program (GEAP). Agencies shall be instructed in writing to expand the GEAP (Outcome Statement 2) so that it includes the original 7.5% share of the State allocation for the service area plus the sums associated with rejected projects. Expanded GEAP projects incorporating funds associated with rejected general local projects designs (Outcome Statement 1) plus the 7.5% funds allocated for Outcome Statement 2 must be submitted to the OEO not later than November 17, 2015. If not accomplished, the OEO may redistribute the funds for rejected projects to other service areas of the State.

D. POLICY ON LATE SUBMISSIONS

Specific time frames are established to permit appropriate review and action on projects and budgets prior to January 1, 2016. For purposes of validation of submissions, the only acceptable evidence to establish receipt by the due date shall be the date of receipt at the OEO as shown on the time date stamp on the project package. This date must be on or before those dates identified in this Plan. The OEO will respond appropriately to each submission. Rejected projects or those submitted after the deadlines shall have CSBG funds associated therewith allocated to the GEAP (Outcome Statement 2). Only applications containing all required documents at the time received by the OEO will be accepted for review. Therefore, the policy of the OEO shall be that local initiative projects submitted after a specified due date will not be reviewed. Instead, these projects shall be considered as rejected for CSBG funds and the entity's allocation will be used for GEAP in the area of service of the eligible entity.

APPENDIX A

GLOSSARY OF KEY TERMS

Act: Public Law 97-35, Subtitle B, Title VI of the Omnibus Budget Reconciliation Act of 1981. Related reference: Human Services Reauthorization Act of 1984, Public Law 98-558, Title II. Titles from both Acts are entitled Community Services Block Grant.

Activities/Milestones: Interim behaviors that describe customer processes and progress; indicator(s) that will be used to establish or confirm and document achievement of activity/milestone.

Causes: The reason(s) or circumstance(s) for a poverty problem.

Chief Executive Officer of the State: The Governor of South Carolina.

COG: Council of Governments in South Carolina.

Community Action Agency/Subgrantee: Any organization which was officially designated as a Community Action Agency under the provisions of Section 210 of the Federal ECONOMIC OPPORTUNITY ACT of 1964 for federal fiscal year 1981. Hereinafter referred to as a CAA.

Community Economic Opportunity Act of 1983: Act 143 of 1983, South Carolina Code of Laws, which provides for: Implementation of U.S. Public Law 97-35, cited above as the "Act;" designation of an administrative agency; local administrative organizations; eligibility requirements and other matters concerning community action agencies.

Community Services Program: All activities funded in South Carolina under the Community Services Block Grant Act.

Direct Services: CSBG Direct Services consist of those units of service which can be directly tracked or linked to a specific individual--e.g.: employment counseling.

Eligible Entities: Entities eligible to apply for CSBG funds are a CAA or limited purpose agencies designated under the Title II of the Economic Opportunity Act of 1964 for fiscal year 1981 which served the general purposes of a community action agency under Title II of such Act; or, any subgrantee which received assistance under Section 222(a)(4) of the Economic Opportunity Act of 1964 in fiscal year 1981.

Also, in any geographic area of the state not presently served by an existing eligible entity, the Governor may have services provided to such a new area by:

(A) Requesting an existing eligible entity which is located and provides services in an area contiguous to the new area to serve the new area; or,
(B) If no existing eligible entity is located and provides services in an area contiguous to the new area, requesting the eligible entity located closest to the area to be served or an existing eligible entity serving an area within reasonable proximity of the new area to provide services in the new area; or,
(C) Where no existing eligible entity requested to serve the new area decides to do so, designating as an existing eligible entity, any organization which has a Board meeting the requirements of Section 676 or any political subdivision of the state to serve the new area. The designation by the Governor of an organization which has a Board meeting the requirements of Section 676 or a political subdivision of the state to serve the new area shall qualify such organization as an eligible entity.

The State serves all counties of South Carolina with Community Services Block Grant funds. Organizations officially designated as a community action agency under the provisions of the Economic Opportunity Act of 1964 for fiscal year 1981 have been eligible entities. This policy has been in effect since 1982 and may remain in effect for PY 2016.

Federal Fiscal Year: October 1 to September 30.

Indirect Services: Indirect Services consist of those units of service, which are provided to the community at-large for the purposes of promoting the social and economic self-sufficiency of low-income persons. These types of service units are usually difficult to link to a specific individual--e.g. community meetings or public education efforts.

Low-Income Population: Persons or families whose total income is at or below the poverty line established by the Director of the Office of Management and Budget.

Needs Assessment: The act of conducting a community survey to gather accurate information about the needs of the poor people living in the community.

State/Grantee: South Carolina Office of Economic Opportunity (OEO).

DOA: South Carolina Department of Administration

Outcome Statement: An inspiring statement that defines the end-state sought, stated in customer terms.

Performance Target Outcome: A ROMA direct measure that defines success for your program in terms of what clients will actually achieve. These are measurable based on outcome statements that allow demonstration of program success.

Priority: Action taken by the Board of Directors of a CAA to identify and rate community problems by need and importance. Problems will be identified during the needs assessment conducted by eligible entities.

Problem: An obstacle created by a cause(s) or reflecting a condition that prevents individuals or families who are poor from becoming self-sufficient.

Project: The program to be funded with CSBG funds during the project period.

Project Operator: An eligible entity that will provide local community CSBG programs during PY 2016.

Project Work Plan: The sum of the application documents for a CSBG project.

Program Year (PY): January 1, 2016 - December 31, 2016.

ROMA: Results-Oriented Management and Accountability system for measuring performance and results.

Secretary: The Secretary of the U.S. Department of Health and Human Services.

Service Area: The area of the state in which a project operator will implement Community Services Block Grant activities. The minimum service area shall be a county.

Social and Economic Self-Sufficiency: The ability of an individual to meet his or her social and economic needs without assistance from other persons or organizations.

State: South Carolina.

Strategy: A specific approach to be used to achieve a stated goal and outcome.

Total Community: All elements of the community, including private and public organizations, units of local government, and the total general population.

Unit of Service: Any specific activity or action engaged in with a low-income person and/or on behalf of such person for the purpose of accomplishing social and economic self-sufficiency goals.

Reasonable Time: The amount of time deemed necessary to execute requirements as circumstances permit.

18 Hour Life Threatening emergencies: A situation that has already or poses an immediate risk to life, health and safety directly related to the home or home energy heating/cooling costs.

48 Hour emergencies: A situation that poses a threat to life, health and safety directly related to the home or home energy heating/cooling costs.

72 Hour Non-emergencies: A situation with a high probability of escalating to cause danger to life, health and safety directly related to the home or home energy heating/cooling costs.

APPENDIX B

DETAILED APPLICATION PROCEDURES

I. PLANNING

A. Annual Needs Assessment

Prior to applying for CSBG funds, each eligible entity will be required to comply with the assurance outlined in 676(b)(11) to conduct a needs assessment within the service area to identify needs and/or problems. The needs assessment is to consist of three phases: Problem Identification and Statement; Resource Analysis; and Prioritization according to the following.

Each Eligible Entity's Community Needs Assessment should address the following issues and questions:

1. Describe the method(s) used to gather information on critical community needs.
2. This section should detail the methodology utilized in collecting data for the community needs assessment to include data collection methods and data utilized such as:
    a. Service history information evidencing and analyzing the demand for services considering not only a comparison of planned versus actual services, but also including an analysis of how funds allotted for the particular service have historically been expended.
    b. Customer surveys and how completed surveys were obtained (i.e. through mail, door-to-door, gathered at the time agency provided direct service to customer, etc.), as well as the actual tool utilized.
    c. Participation in focus groups or community forums—Please note that objectivity is key in gaining an accurate view of the true needs within any service areas and these two methods of data collection are less objective than others.
    d. Participation of agency staff, board members, and executive director.
    e. Participation and survey of other community groups and organization that serve the same target population.
3. Describe the economic conditions of each county within its service delivery area.
4. This section shall involve research utilizing statistical reports such as the most recent Census data and/or the Census Bureaus more frequent Community Surveys, appropriately documented and identified as sources. The section can also present data available from other sources such as Kids Count and the community needs studies conducted by locally operated organizations such as United Ways, or newspaper, magazine articles, and publicized information relating to employment, education, health and nutrition, transportation or any of the other defined service categories, that evidence needs within a particular geographic area served by an eligible entity.
5. List the critical community needs identified for its service delivery area.
6. In this section, eligible entities should discuss the results of the community needs assessment process being as specific as possible (i.e. a tally for each question of the responses given).

1. Problem Identification and Problem Statement:

The applicant describes existing adverse conditions affecting the low-income population and delineates the differences between what exists (the problem) and what should exist (the goal). There must be a direct relationship between the needs of the poor in the local communities and the goals of the applicant agency in the CSBG Work Plan.

The problem statement must be clear and concise, identifying the problem, the cause(s), the number, characteristics, and the geographic area affected. The problem statement must be clearly drawn from the results documented in the needs assessment data.

Relevant, current data must be obtained from a variety of sources for a needs assessment including:

- surveys
- community meetings
- units of local government
- census information
- agency data
- board and staff perceptions
- reports and studies of other agencies
- other pertinent sources as available

When reviewing data, some of the questions that might be asked include:

a. What is the quality of the data used in the needs assessment?
b. Is it current, objective and comprehensive?
c. Are sources documented so that they could be obtained by other researchers and planners?
d. Were a number of types of sources used for each problem such as:
   - special statistics
   - other service agency providers
   - low-income groups
   - community studies
e. Are the results of prior year evaluations and performance assessments being considered?

2. Resource Analysis: An agency cannot effectively address problems identified unless there has been a thorough analysis of resources that are available. For each problem identified, the agency must identify the public and private resources available to address each problem in the service area. In partnerships, specific roles and responsibilities must be identified. Many anti-poverty resources are administered by other agencies. CSBG and ROMA require that these resources be mobilized in combating poverty problems.

   A six-step procedure for analyzing resources is:

   1. List problem areas
   2. Identify existing state and community agency resources
   3. Obtain performance information
   4. Review agency referral records
   5. Analyze the information
   6. Develop agency contacts to establish linkages

   Once a potential resource is identified, evaluate its present and potential impact on the problems already identified. Often the resources under consideration include agencies that are service providers to the poor. The following questions may be helpful in reviewing the capability of other service providers:

   Criterion One: Is service to the poor a major function of the agency under review?
   Criterion Two: Is the service oriented to the characteristics, requirements and needs of the poor?
   Criterion Three: Is the service accessible to the poor?
   Criterion Four: Do specific application eligibility or case management procedures create participation barriers for the poor?

   After a careful analysis of all resources is done, the agency should review the following:

   a. Were private and public resources researched and analyzed for the problem area?
   b. What agencies and institutions are conspicuously absent from consideration?
   c. What agencies should be addressing specific need areas or target groups, but are not?
   d. Is performance information about other resource agencies and institutions included?
   e. Are referral records being used to determine gaps in service within particular need areas?
   f. Are the most severe poverty problems receiving the largest share of community resources?
   g. Are resources being allocated reasonably among problem causes?

3. Prioritization:
   Once major problems existing in the service area are identified, the applicant's Board of Directors has to make a decision on which major problems it will address.

   Problems are to be grouped according to approved CSBG program areas such as education, employment, health, nutrition, emergency assistance and housing. The Board must then set funding priorities based on established criteria such as: magnitude of the problem (intensity and severity), capability of the agency to eliminate the negative consequences of the problem, available resources and probable impact.

   Some pertinent questions for the Board to examine are as follows:
   - Are the problem priorities based on recent data or do they tend to support the agency's current programs?
   - Have priorities been assigned to causes within a problem area?
   - Do the priorities include needs of the target populations?

B. Needs Assessment Summary and Priorities

At the time of application, each agency will submit a copy of the needs assessment instrument, an Annual Needs Assessment Summary and Problem Priorities. A copy of the minutes of the Board meeting at which the Board set the priorities must be attached to the Needs Assessment Summary. The Summary is to identify the sampling size and demographic base to include approximate age groups.

II. APPLICATION PREPARATION

A. Forms

In addition to the Needs Assessment information, the application forms listed in Section IV (A) must be completed and submitted (one original in a 3-ringed binder and three copies) to the OEO.

B. Preparation

Instructions for completing each form and narrative and copies of the forms are located at www.oepp.sc.gov/oeo.

OEO Form 507, Subgrantee Identification Information & Capacity

(This form is intended to capture all agency funds to include State, local, private, Federal, and non-Federal)

APPENDIX C

(revised 7/2011)

Subgrantee Name: ____________________

Street Address: ____________________

City, State, Zip Code: ____________________

Governing Body Chairperson's Name: ____________________

Home Address: ____________________

Telephone & Facsimile Numbers: ____________________

Executive Director's Name: ____________________

Home Address: ____________________

Telephone & Facsimile Numbers: ____________________

Type of Subgrantee (mark one)

a. ☐ Community Action Agency

b. ☐ City/County Government ____________ (Specify)

c. ☐ Non-Profit Community Based Organization

d. ☐ Migrant & Seasonal Farm-Worker Organization

Counties of Agency Service Area: ____________, ____________, ____________, ____________, ____________, ____________, ____________

ALL AGENCY PROGRAMS CURRENTLY OPERATED PY 2015

FUNDING SOURCE NAME	PROGRAM/GRANT NAME	$LOCAL GOV.	$STATE GOV.	$FEDERAL GOV.	$PRIVATE	#PERSONS SERVED
Use Additional OEO 507 Forms if Necessary	TOTALS	$	$	$	$	

APPLICATION CERTIFICATION

Total Agency Funds Received PY 2015: $____________

Total CSBG Funds Requested for PY 2016: $____________

Total Number of CSBG Projects Proposed for PY 2016: ______

This application has been approved by the applicant's governing body.

a. Name of Governing Body Chairperson: ____________________

b. Signature: ____________________

c. Date: ____________________

OEO 509 Narrative, Subgrantee Financial Capability Survey **APPENDIX D**

Each agency must provide 509 Narrative information as outlined below and attach copies of current documents or procedures requested below.

SECTION I – IDENTIFICATION

AGENCY: _____ **DATE SUBMITTED:** _____

NAME, TITLE AND PHONE NUMBER OF FISCAL OFFICER:	Name _____ Title _____ Telephone # _____ Fax # _____

SECTION II – ACCOUNTING SYSTEM

1. Does the Subgrantee have an approved Indirect Cost Rate? Yes ☐ No ☐

2. The accounting method for recording and reporting financial information: Cash ☐ Accrual ☐

3. The accounting system is: Manual ☐ Automated ☐

4. Briefly describe the Books of Original Entry used by the Subgrantee: _____

_____

_____

5. Does the Subgrantee's accounting system provide for accounting and recording expenditures by grants and cost categories?
Yes ☐ No ☐

6. Does the Subgrantee use an operating budget to control funds by activity? Yes ☐ No ☐

7. Does the Subgrantee prepare an internal monthly financial report? Yes ☐ No ☐

8. Does the Subgrantee have written accounting procedures? Yes ☐ No ☐ (submit copy)

9. List positions authorized to sign checks for the Subgrantee: _____

_____

_____

10. To whom does the Fiscal Officer report? _____

SECTION III – GENERAL INFORMATION

Please discuss financial capacity problems previously noted by the OEO and the corrective actions implemented by the Subgrantee for the new program year: _____

_____

_____

_____

_____

_____

_____

_____

APPENDIX E

OEO 511: Outreach Narrative
(Use additional sheets as necessary)

1. Provide a copy of the schedule used to serve each county (hours & dates) with the physical location of each center site.
2. If a county does not have a satellite/neighborhood center, how will that county be served?
3. Where will staff perform intakes? When staff is out of the office, who's responsible for assisting clients?
4. How will the agency set days of the month and advertise the scheduled site hours?
5. How will you monitor outreach staff performance? (For example, staff meetings, one-on-one meetings, etc.)
6. What type of training will be provided to outreach workers?
7. Will outreach workers be trained, aware of, and given a copy of the current year Work Plan and CSBG Performance Measures?
8. What will be the procedure used for gathering data needed for the monthly Financial Status Report (FSR)
9. How will you ensure FSR figures submitted by outreach workers are correct?
10. Describe the agency's case management policy & procedures (Provide a copy if available).
11. How will you ensure case management figures are correct, and the case management policy & procedures are followed?

Logic Model Narrative: Subgrantee Project Description

The narrative is the basic description of the work to be performed by an applicant with PY 2016 CSBG funds. A separate Logic Model Narrative is required for each project an applicant proposes to operate in PY 2016 using CSBG funds.

Section I – Identification

AGENCY: _____ **APPLICABLE DATES:** _____ to _____

1. **Project Name:** _____
2. **Service Category(ies):** _____

   _____

3. **Total CSBG Funds for this Project: $**_____ 4. **Total Non-CSBG Funds for this Project: $**_____

Section II – Narrative Information

1. **Description/Approach: Describe the project. Include what the agency will do and how the agency will do it.**

_____

_____

_____

_____

_____

_____

2. **Assistance Levels:** **Will this project provide direct client assistance? Explain.**

_____

_____

3. **Selection Rationale:** **Why has the agency selected this project?**

_____

_____

4. **Partnerships:** **Define specific roles with other human services agencies, faith based organizations and partners.**

_____

_____

_____

5. **Client Activities & Verification:** **List the primary activities/milestones (customer behaviors) that will measure customer progress from program entry to measure achievement. For each activity list at least one clear and identifiable means of verification.**

_____

_____

_____

_____

_____

_____

ROMA LOGIC MODEL

BUDGET/Direct Client Service: $_____

Agency Name: _____

Program: _____ ☐ **Family** ☐ **Agency** ☐ **Community**

Identified Problem, Need, Situation	Service or Activity Identify the timeframe. Identify the # of clients served or the # of units offered.	Outcome (NPI)	Outcome/Indicator Projected # and % of clients who will achieve each outcome. or Projected # and % of units expected to be achieved.	Actual Results Actual # and % of clients who achieve each outcome. or Actual # and % of units achieved.	Measurement Tool	Data Source, Collection Procedure, Personnel	Frequency of Data Collection and Reporting
(1) Planning	(2) Intervention	(3) Intervention	(4) Intervention	(5) Impact	(6) Accountability	(7) Accountability	(8) Accountability

Mission:

Proxy Outcome:

Virtual Outcomes College, National ROMA Train-the-Trainer Program, Participant Manual for Community Action Agencies and CSBG Subcontractors, Version 4.1, © FY 2001,2002, 2003, revised March 2003, The Center For Applied Management Practices, Harrisburg, PA 717-238-7667, all rights reserved.

Instructions for Completing ROMA Logic Model Narrative:

A separate ROMA Logic Model must be prepared for each PY 2016 CSBG Project.

The narrative is the basic description of the work to be performed by an applicant with CSBG funds.
A separate Narrative is required for each project an applicant proposes to operate with CSBG funds.

The Logic Model serves as:

- The description of the ROMA Goals, Direct Measures, and Indicators to be achieved for each project to be undertaken with CSBG funds, including project outcome statement, measures (performance targets), approach/methodology, selection rationale, client activity/milestones, target numbers and verification.
- The description of how linkages will be developed to fill identified gaps in services, through the provision of information, referrals, case management and follow-up consultations;
- The description of how CSBG funds will be coordinated with other public and private resources;
- The description of how CSBG funds will be used to support innovative community, agency and family-based initiatives related to the purposes of CSBG and ROMA;
- A program monitoring tool for tracking and assessing project performance outcomes.
- A Grant Amendment when new projects are added or significant changes are made in approved projects.

Section I – Identification

1. Project Name: Enter the title of the project the applicant plans to implement to address the problem/need and the project's associated CSBG approved Service Category(-ies).
   a. The "Service Category" listed must be identified in the subgrantee's Needs Assessment and enclosed with the grant application. In the Needs Assessment, the poverty-related problem must be stated so as to give the what, why, who, and where. The statement must clearly and concisely identify the real problem, the causes of the problem, the number and characteristics of those affected, and the geographical area affected. A copy of the assessment process and results must be on file at the subgrantee's office for review by the OEO.
   b. In the Needs Assessment, give current statistical data that supports and documents the causes and severity of the problem/need. The statistical data serves to clarify the scope and magnitude of the problem/need. It must be specific and must relate to the identified problem/need. Give titles and dates of sources used.
2. Total Funds for this Project from All Sources: Enter the total amounts of funding planned to be received from all funding sources for the implementation of project addressed on the Logic Model.

Section II – Narrative Information

Using the Narrative Form, provide the information in detail. Use additional sheets as needed.

1. Description/Approach: Enter a general description of the approach (methodology, product description) to be used for achieving the outcomes. Describe the product and its core features. What "vehicle" will you use to influence customer change? What activities, services, strategies, tactics, actions, etc. will be used? What quality and quantity will be necessary to get a customer to the target? The approach, or product description, must connect in an obvious way to the needs and characteristics of customers.

2. Assistance Levels: Indicate the maximum amount of direct client assistance that will be provided to individuals and/or households for each project and the services that will be allowed as direct client assistance.

3. Selection Rationale: Describe why the proposed strategies have been selected, and why they are expected to be effective. Discuss "prior results and learning," or what you will do differently to achieve targeted program outcomes, based on research or prior experience. If other community resources are being applied to the problem, describe how the proposed approach or activities will differ from, reduce barriers to or fill gaps in existing services.

4. Partnerships: Lists other entities involved in and supporting the specific project to include a clear definition of the role and responsibility of each partner. Provide Letters of Support from partners listed.

5. Client Activities & Verification: List the primary activities that will measure customer progress from program entry to measure achievement. For each activity, list at least one clear and identifiable means of verification.

OCS' Monitoring and Assessment Task Force
National Goals and Outcome Measures

Effective October 1, 1999

For each goal that corresponds to the work your agency does, select at least one measure to report on, based on a current needs assessment survey. If you feel that none of the measures under a particular goal is a good measure of the work actually done by your agency, create a measure that more accurately reflects the work you do. In addition, note that some of the measures could easily apply to other goals as well as the one under which they are listed; use them wherever they seem most appropriate to you.

In measures below, number, wherever it appears, is to be expressed in two parts: the actual count, and the baseline total. For example, when the measure is number of households maintaining employment, express it as a factor of the total number of households served by the agency (e.g., 27 out of 86). Do not indicate percentages (e.g., 31.4% or even 31 out of 100, unless your baseline total is actually 100 households); the data need to be aggregated with that of other agencies before percentages are calculated.

GOAL 1: (SELF-SUFFICIENCY) LOW-INCOME PEOPLE BECOME MORE SELF-SUFFICIENT

Direct measures:

a. Number of participants seeking employment who obtain it [as compared with the total number of participants].
b. Number of participants maintaining employment for a full twelve months.
c. Number of households in which adult members obtain and maintain employment for at least ninety days.
d. Number of households with an annual increase in the number of hours of employment.
e. Number of households gaining health care coverage through employment.
f. Number of households experiencing an increase in an annual income as a result of earnings.
g. Number of households experiencing an increase in annual income as a result of receiving allowable tax credits, such as the earned income and childcare tax credits.
h. Number of custodial households who experience an increase in annual income as a result of regular child support payments.
i. Number of participating families moving from substandard housing into stable standard housing, as compared with the total number of participating families.
j. Number of households which obtain and/or maintain home ownership.
k. Number of minority households which obtain and/or maintain home ownership.
l. Number of people progressing toward literacy and/or GED.
m. Number of people making progress toward post-secondary degree or vocational training.
n. Other outcome measure(s) specific to the work of your agency.

Survey question measures:

o. Number of clients who consider themselves more self-sufficient since participating in services or activities of the agency.
p. Number of clients reporting an increase in income since participating in the services of the agency.

Scale measures:

q. Number of households which demonstrated movement up one or more steps on a scale or matrix measuring self-sufficiency
r. Number of households achieving positive movement in self-sufficiency as demonstrated by an increase of at least one point in an overall score of a Family Development Scale.
s. Number of households achieving stability in the _____ dimension of a Family Development Matrix.

GOAL 2: (COMMUNITY REVITALIZATION) THE CONDITIONS IN WHICH LOW-INCOME PEOPLE LIVE ARE IMPROVED

Direct Measures:

a. Number of accessible, living wage jobs created and/or retained.
b. Increase in assessed value of homes as a result of rehabilitation projects.
c. Increase in proportion of state and federal funds allocated for meeting emergency and long-term needs of the low-income population.
d. Increase in access to community services and resources by low-income people.
e. Increase in available housing stock through new construction.
f. Increase in the availability and affordability of essential services, e.g. transportation, medical care, child care.
g. Other outcome measure(s) specific to the work done by your agency.

Survey question measures:

h. Number of households who believe the agency has helped improve the conditions in which they live.

Scale measures:

i. Number of communities which demonstrated movement up one or more steps on a scale or matrix measuring community self-sufficiency, community health, or community vitality.

j. Number of communities achieving stability in the _____ dimension of the Community Scaling Tool.

GOAL 3: (COMMUNITY REVITALIZATION) LOW-INCOME PEOPLE OWN A STAKE IN THEIR COMMUNITY

Direct measures:

a. Number of households owning or actively participating in the management of their housing.

b. Amount of "community investment" brought into the community by the Network and targeted to low-income people.

c. Increase in minority businesses owned.

d. Increase in access to capital by minorities.

e. Increased level of participation of low-income people in advocacy and intervention activities regarding funding levels, distribution policies, oversight, and distribution procedures for programs and funding streams targeted for the low-income community.

f. Other outcome measure(s) specific to the work done by your agency.

Survey question measures:

g. Number of households participating or volunteering in one or more groups.

h. Number of households who say they feel they are part of the community.

Scale measures

i. Number of communities which demonstrated movement up one or more steps on a scale or matrix measuring community self-sufficiency, community health, or community vitality.

j. Number of communities achieving stability in the _____ dimension of the Community Scaling Tool.

GOAL 4: PARTNERSHIPS AMONG SUPPORTERS AND PROVIDERS OF SERVICES TO LOW-INCOME PEOPLE ARE ACHIEVED

Direct measures:

a. Number of partnerships established and/or maintained with other public and private entities to mobilize and leverage resources to provide services to low-income people.

b. Number of partnerships established and/or maintained with other public and private entities to complete the continuum of care for low-income people.

c. Number of partnerships established and/or maintained with other public and private entities which ensure ethnic, cultural, and other special needs considerations are appropriately included in the delivery service system.

d. Other outcome measure(s) specific to the partnerships created by local agencies.

Survey question measures:

e. Number of principal partners who are satisfied with the partnership.

f. Partner's rating of the responsiveness of the agency.

Scale Measures:

g. Number of agencies which demonstrated movement up one or more steps on a scale or matrix measuring agency partnership capacity.

h. Number of agencies achieving stability in the _____ dimension of an agency partnership capacity scaling tool.

i. Number of agencies that achieve and maintain commitments from other service and resource partners to carry out agency mission.

j. Number of agencies that establish and maintain commitments to provide resources to partner organizations that serve agency customers.

k. Number of agencies that establish and maintain coordination of agency and non-agency resources to create

a. a programmatic continuum of services with outcome-based objectives establishes and maintains a selection process which ensures that low-income community members are elected in a public process.

GOAL 5: AGENCIES INCREASE THEIR CAPACITY TO ACHIEVE RESULTS

Direct measures:

a. Total dollars mobilized by the agency.

b. Total dollars mobilized by the agency as compared with CSBG dollars.

c. Number of boards making changes as a result of a periodic organizational assessment.

d. Number of programs which have become more effective as a result of research and data (their own as well as others).

e. Number of programs which have become more effective as a result of needs assessment surveys.

f. Number of families having their situation improved as a result of comprehensive developmental services.

g. Increase in community revitalization as a result of programs.
h. Number of agencies increasing their number of funding sources and increasing the total value of resources available for services to low-income people.
i. Number of agencies leveraging non-CSBG resources with CSBG resources at a ratio greater than 1:1.
j. Number of agencies where board composition accurately represents the ethnic diversity of the service territory.
k. Number of agencies where customers served accurately represents the ethnic diversity of the service territory.
l. Number of agencies where staffing component accurately represents the ethnic diversity of the service territory.
m. Number of development contacts as a result of outreach programs.
n. Number of special populations showing improvement as a result of programs aimed at the population.
o. Number of clients showing improvement as a result of emergency services received.
p. Other outcome measure(s) specific to the work done by local agencies.

Scale measures:
q. Number of agencies that achieve and maintain compliance with all applicable Federal, State, and local statutes, regulations, and requirements.
r. Number of agencies that achieve and maintain a governance process that is inclusive, representative of, and accountable to the community.
s. Number of agencies that achieve and maintain a workforce environment which empowers and develops its employees, has open communications, pays its employees a living wage, and is mission-driven.
t. Number of agencies which achieve and maintain a planning, measurement, and evaluation system which creates a programmatic, continuum of services with outcomes-based objectives, and where the measurements of programs are used to improve services.
u. Number of agencies that achieve and maintain communication and feedback processes that engage all stakeholders.
v. Number of agencies that establish and maintain a process where evaluations are used to improve services.

GOAL 6: (FAMILY STABILITY) LOW-INCOME PEOPLE, ESPECIALLY VULNERABLE POPULATIONS, ACHIEVE THEIR POTENTIAL BY STRENGTHENING FAMILY AND OTHER SUPPORTIVE SYSTEMS

Direct measures:
a. Number of aged households maintaining an independent living situation.
b. Number of disabled or medically challenged persons maintaining an independent living situation.
c. Number of households in crisis whose emergency needs are ameliorated.
d. Number of participating families moving from homeless or transitional housing into stable standard housing.
e. Number of households in which there has been an increase in donation of time to volunteer activities (not mandated by welfare-to-Work Plans).
f. Number of households in which there has been an increase in children's involvement in extracurricular activities.
g. Number of high consumption households realizing a reduction in energy burden
h. Number of households moving from cultural isolation to involvement with their cultural community.
i. Other outcome measure(s) specific to the work done by your agency.

Survey question measure:
j. Number of households indicating improved family functioning since participating in the services or activities of the agency.

Scale measures:
k. Number of households moving from crisis to stability on one dimension of a scale.
l. Number of households moving from vulnerability to stability on one dimension of a scale.
m. Number of households moving from a condition of crisis to a condition of vulnerability on one dimension of a scale.

National Indicators Listing

Goal 1: Low-Income People Become More Self-Sufficient

National Performance Indicator 1.1 – Employment

The number and percentage of low-income participants in community action employment initiatives who get a job or become self-employed as measured by one or more of the following:

A. Unemployed and obtained a job.
B. Employed and obtained an increase in employment income.
C. Achieved "living wage" employment and benefits.

National Performance Indicator 1.2 – Employment Supports

The number of low-income participants for whom barriers to initial or continuous employment are reduced or eliminated through assistance from community action as measured by one or more of the following:

A. Obtained pre-employment skills/competencies required for employment and received training program certificate or diploma.
B. Completed ABE/GED and received certificate or diploma.
C. Completed post-secondary education program and obtained certificate or diploma.
D. Enrolled children in "before" or "after" school programs, in order to acquire or maintain employment.
E. Obtained care for child or other dependant in order to acquire or maintain employment.
F. Obtained access to reliable transportation and/or driver's license in order to acquire or maintain employment.
G. Obtained health care services for themselves or a family member in support of employment stability.
H. Obtained safe and affordable housing in support of employment stability.
I. Obtained food assistance in support of employment stability

National Performance Indicator 1.3 – Economic Asset Enhancement and Utilization

The number and percentage of low-income households that achieve an increase in financial assets and/or financial skills as a result of community action assistance, and the aggregated amount of those assets and resources for all participants achieving the outcome, as measured by one or more of the following:

A. Enhancement –
    1. Number and percent of participants in tax preparation programs who identify any type of Federal or State tax credit and the aggregated dollar amount of credits
    2. Number and percentage obtained court-ordered child support payments and the expected annual aggregated dollar amount of payments.
    3. Number and percentage enrolled in telephone lifeline and/or energy discounts with the assistance of the agency and the expected aggregated dollar amount of savings.
B. Utilization –
    4. Number and percent demonstrating ability to complete and maintain a budget for over 90 days.
    5. Number and percent opening an Individual Development Account (IDA) or other savings account and increased savings, and the aggregated amount of savings.
    6. Of participants in a community action asset development program (IDA and others):
        a. Number and percent capitalizing a small business due to accumulated savings.
        b. Number and percent pursuing post-secondary education due to savings.
        c. Number and percent purchasing a home due to accumulated savings

Goal 2: The Conditions in Which Low-Income People Live are Improved

National Performance Indicator 2.1 Community Improvement and Revitalization

Increase in, or preservation of opportunities and community resources or services for low-income people in the community as a result of community action projects/ initiatives or advocacy with other public and private agencies, as measured by one or more of the following:

	Number of Projects/Initiatives	*Number of Opportunities*

A. Accessible "living wage" jobs created or retained in the community. _____ _____

B. Safe and affordable housing units created in the community. _____ _____

C. Safe and affordable housing units in the community preserved or improved through construction, weatherization or rehabilitation achieved by community action activity or advocacy _____ _____

D. Accessible and affordable health care services/facilities for low-income people created or maintained. _____ _____

E. Accessible safe and affordable childcare or child development placement opportunities for low-income families created or maintained. _____ _____

F. Accessible "before" school and "after" school program placement opportunities for low-income families created or maintained. _____ _____

Accessible new, preserved, or expanded transportation resources available to low-income people, including public or private transportation. _____ _____

G. Accessible preserved or increased educational and training placement opportunities for low-income people in the community, including vocational, literacy, and life skill training, ABE/GED, and post-secondary education _____ _____

National Performance Indicator 2.2 -- Community Quality of Life and Assets

The quality of life and assets in low-income neighborhoods are improved by community action initiative or advocacy, as measured by one or more of the following:

A. Increases in community assets as a result of a change in law, regulation or policy, which results in improvements in quality of life and assets;
B. Increase in the availability or preservation of community facilities;
C. Increase in the availability or preservation of community services to improve public health and safety;
D. Increase in the availability or preservation of commercial services within low-income neighborhoods; and
E. Increase or preservation of neighborhood quality-of-life resources.

Goal 3: Low-Income People Own a State in Their Community

National Performance Indicator 3.1 – Civic Investment

The number of volunteer hours donated to Community Action.

The current CSBG/IS Survey collects this information and most already report the number of hours volunteered by local residents. Please report the number found in Part I: Section F, Subsection IV (g) of the CSBG/IS Survey here.

National Performance Indicator 3.2 – Community Empowerment through Maximum Feasible Participation

The number of low-income people mobilized as a direct result of community action initiative to engage in activities that support and promote their own well-being and that of their community as measured by one or more of the following:

A. Number of low-income people participating in formal community organizations, government, boards or councils that provide input to decision-making and policy setting through community action efforts.
B. Number of low-income people acquiring businesses in their community as a result of community action assistance.
C. Number of low-income people purchasing their own homes in their community as a result of community action assistance.
D. Number of low-income people engaged in non-governance community activities or groups created or supported by community action.

Goal 4: Partnerships Among Supporters and Providers of Service to Low-Income People are achieved

National Performance Indicator 4.1 – Expanding Opportunities through Community-Wide Partnerships

The number of organizations, both public and private, community action actively works with to expand resources and opportunities in order to achieve family and community outcomes.

Goal 5: Agencies Increase Their Capacity to Achieve Results

National Performance Indicator 5.1 – Broadening the Resource Base

The number of dollars mobilized by community action, including amounts and percentages from:

A. Community Services Block Grant (CSBG)
B. Non-CSBG Federal Programs
C. State Programs

D. Local Public Funding
E. Private Sources (including foundations and individual contributors, goods and services donated)
F. Value of volunteer time

Goal 6: Low-Income People, Especially Vulnerable Populations, Achieve Their Potential by Strengthening Family and Other Supportive Systems

National Performance Indicator 6.1 – Independent Living

The number of vulnerable individuals receiving services from community action that maintain an independent living situation as a result of those services:

A. Senior Citizens; and
B. Individuals with Disabilities

National Performance Indicator 6.2 – Emergency Assistance

The number of low-income individuals or families served by community action that sought emergency assistance and the percentage of those households for which assistance was provided, including such services as:

A. Food
B. Emergency Payments to Vendors, including Fuel and Energy Bills
C. Temporary Shelter
D. Emergency Medical Care
E. Protection from Violence
F. Legal Assistance
G. Transportation
H. Disaster Relief

National Performance Indicator 6.3 – Child and Family Development

The number and percentage of all infants, children, youth, parents, and other adults participating in developmental or enrichment programs that achieve program goals, as measured by one or more of the following:

A. Infants and Children –

1. Infants and children obtain age appropriate immunizations, medical and dental care.
2. Infant and child health and physical development are improved as a result of adequate nutrition.
3. Children participate in pre-school activities to develop school readiness skills.
4. Children who participate in pre-school activities are developmentally ready to enter Kindergarten or 1st Grade.

B. Youth –

1. Youth improve physical health and development.
2. Youth improve social/emotional development.
3. Youth avoid risk-taking behavior for a defined period of time.
4. Youth have reduced involvement with criminal justice system.
5. Youth increase academic, athletic or social skills for school success by participating in before or after school programs.

C. Parents and Other Adults –

1. Parents and other adults learn and exhibit improved parenting skills.
2. Parents and other adults learn and exhibit improved family functioning skills.

Step 1: Preliminary Agency Checklist – Matching Activities to Performance Indicators

As indicated, community action agencies and eligible entities are asked to submit ROMA outcome information only for those national performance indicators for which they have supporting programs and activities (CSBG *and* all other funding sources).

In order to help agencies identify national performance indicators relevant to their programs and activities, the following Preliminary Agency Checklist cross-references various community action services, activities and funding sources to the 12 national performance indicators.

PRELIMINARY AGENCY CHECKLIST

Community Action Program or Activity	National Performance Indicator	Current ROMA Direct Measure (May be found at www.ROMA1.org)
Adult Basic Education	1.2	1l
Advocacy	2.1, 2.2	2g, 3e
After school Programs	1.2, 2.1, 6.3	6f
Agency Capacity	5.1, 4.1	5a
Aging Programs	6.1	6a
Asset Formation	1.3, 3.2	1n
Board Membership	3.2	3a
Childcare	1.2, 2.1	1n
Child Development – Health	6.3	6i
Child Development -- Nutrition	6.3	6i
Child Development -- School Readiness	6.3	6i
Child Support	1.3	1h
Childcare Tax Credit	1.3	1g
Civic Involvement	3.2	3a
Community Enhancement -- Businesses	3.2	3c. 3d
Community Enhancement -- Community Facilities	2.2	2d
Community Enhancement -- Housing	2.1	2e
Community Enhancement -- Jobs	2.1	2a
Community Enhancement – Safety and Health	2.2	2g
Community Enhancement – Schools	2.2	2d
Community Enhancement -- Transportation	2.1	2f
Community Investments	3.2	2b
Community Organizing	3.2	3g
Daycare	1.2, 2.1	1n
Disability (Independent Living)	6.1	6b
Disaster Relief	6.2	6c
Earned Income Tax Credit (EITC)	1.3	1g
Domestic Violence Prevention/Intervention	6.2	6i
Economic Development	2.1	2g, 3c, 3d
Emergency Medical Care	6.2	6c
Emergency Services	6.2	6c
Employment	1.1	1a, 1d, 1f
Faith Based Organizations	4.1	4a, 4b, 4c, 4d
Family Development	1.1, 1.2, 1.3, 6.3	6i, 6j
Family Functioning	6.3	6j
Food and Nutrition	1.2, 6.1, 6.2, 6.3	6i
GED	1.2	1l
Head Start	1.1, 1.2, 3.1, 3.2, 6.3	1a, 1l, 1m
Health Care	1.2, 2.1, 6.2, 6.3	1n, 2f, 6c, 6i
Higher Education	1.2, 2.1	1m
Home Budget Management	1.3	6j
Home Ownership	1.2, 3.2	1j, 3a

Homeless Programs	6.2	6d
Housing	1.2, 2.1, 3.2	1i, 1j, 1k
Housing Rehabilitation	2.1	2h
Individual Development Accounts (IDAs)	1.3, 3.2	1n
Income Increase -- Employment	1.1	1f
Income Increase -- Non-Employment	1.3	1g, 1h
Job Placement	1.1	1a
Job Skills Training	1.2	1m
Legal Assistance	6.2	6c, 6i
Leveraging Resources	5.1	5a
Life Skills Training	1.3, 6.3	6j
LIHEAP	6.2	6g
Mental Health	1.2, 2.1, 6.2	1n, 1f, 5o, 6c
Parent Involvement	3.1, 3.2	3e, 3f
Parenting Skills	6.3	6i
Partnerships	4.1	4a, 4b, 4c, 4d
Post-Secondary Education	1.2, 2.1	1m
Public Safety	2.2	2g
Recreational Resources/Facilities	2.2	2g
Section 8 Housing	1.2, 2.1	1i, 1j, 1k, 2g
Self-Employment	1.1, 2.1, 3.1 3.2	3c
Self-Sufficiency	1.1, 1.2, 1.3	5f
Shelter	6.2	6d
Substance Abuse	1.2, 2.1, 6.2	1n, 1f, 5o, 6c
Surplus Food	6.2	6c
TANF	1.1, 1.2, 2.1	1a, 1n
Transitional Housing	1.2, 2.1	1i
Transportation	1.2, 2.1	1n
Vendor Payments	6.2	6c
Volunteers	3.1, 3.2	3g
Women, Infants and Children (WIC)	6.3	6i
Weatherization	1.2, 1.3, 2.1	6g
Workforce Investment Act (WIA)	1.1, 1.2	1a, 1n
Youth Programs	1.2, 2.1, 2.2, 6.3	6f

Each local agency is encouraged to use this Preliminary Agency Checklist as a tool to sort through the 12 national performance measures and identify those that apply to programs and activities, and those that do not.

In addition, the Checklist can serve as a planning guide for transferring current ROMA outcome data to the national performance indicator section of the annual ROMA report. The Checklist shows the location of current ROMA outcome measures within the 12 new national performance indicators.

Appendix G

Community Services Block Grant

Prior Year Report on PY 2015 Accomplishments

BACKROUND

The South Carolina Office of Economic Opportunity (OEO) is the State's administering agency for the Community Services Block Grant (CSBG). The Office contracts with 14 community action agencies (CAAs) which assist low-income people who have poverty related problems.

South Carolina granted ninety percent (90%) of the CSBG allocation for the Program Year 2015 to community action agencies based on the percentage of low-income people who live in a CAA area.

In an effort to further facilitate the State's goal of creating innovative approaches to address the issues of poverty, the State awarded five percent (5%) of the CSBG allocation to community action agencies and the state association for discretionary projects (statewide youth leadership projects).

The OEO requires each CAA to send data to the OEO on program accomplishments on a quarterly and annual basis, at a minimum. Program Coordinators from the OEO monitor the agencies during the grant cycle at least once. Each Subgrantee will be monitored in PY 2015.

The 14 CAAs coordinate projects with other social and human service agencies in their respective areas. These other agencies consist of the State Association of Community Action Partnerships, South Carolina Department of Employment and Workforce, SC Department of Social Services, the SC Department of Health and Environmental Control, and the South Carolina Lieutenant Governor's Office on Aging. They also coordinate with units of local government, local churches/faith-based organizations, civic groups, businesses, and special interest groups.

In 2015, the CAAs received the aggregate sum of $10,860,746.51 for the provision of project activities to serve approximately 250,000 eligible clients. Of that, $1,217,736.51 represents 2014 CSBG unexpended funds. The State was not awarded a Community Food & Nutrition (CF&N) grant in 2015.

SUMMARY

The South Carolina Office of Economic Opportunity adheres to the Federal requirements for administration of the Community Services Block Grant. Through the efforts of the 14 CAAs, low-income households in every county in South Carolina are being served with CSBG projects. The results contained in the prior year report clearly demonstrate compliance with the assurance, the State Plan and the Federal requirements associated with the legislation.

Appendix H

Community-Based Organization Board of Directors Membership Form

Name of Agency: _____

Board of Directors Member's Name: _____

If a Board of Directors Officer, state title (Chairperson, Treasurer, Secretary, etc.): _____
Board of Directors Title

Board of Directors Member's Home Address (Mandatory):

Complete Street Address (& Apartment or Lot # if Applicable) City County State Zip

Board of Directors Member's Mailing Address (Optional):

Complete Street Address (or Post Office Box, Apartment, or Lot # if Applicable) City County State Zip Co

Home Telephone Number: ( ) _____-_____ Office Telephone Number: ( ) _____-_____

Report each period served as a Board of Directors Member. Document the initial period, previous Board of Directors Member, and current period. Also report the tripartite category for each period. The tripartite categories are *Representative of Poor, Elected Public Official* or *Elected Public Official Designee,* and *Private Representative*.

Initial Period: / / through / / Tripartite Category: _____
(mo/d/yr) (mo/d/yr)

Current Period: / / through / / Tripartite Category: _____
(mo/d/yr) (mo/d/yr)

Name of the Previous Board of Directors Member for this Seat: _____

If the board member is an *Elected Public Official Designee*, document the name of the designator, current Title of Office (Congressperson, Mayor, County or City Councilperson, etc.) and term duration below:

_____
Name of the Elected Public Official (Designator)

_____/_____/_____ through _____/_____/_____
(mo/d/yr) (mo/d/yr)
Term of Elected Political Office Duration

_____
Title of Office Currently Held

For a Private Representative, list the Major Group's or Interest's name, address, and telephone number with whom the Representative is associated.

Major Group's or Interest's Name: _____

Major Group's or Interest's Telephone # and Location Address: Telephone Number: ( ) _____-_____

Complete Street Address (w/Building or Suite # if Applicable) City County State Zi

I attest that the above referenced Board of Directors Member was selected in accordance with the selection procedures set forth in the organization's current bylaws and CSBG Memorandum Transmittal No. 82 of February 8, 2005.

_____ / /
Board of Directors Member's Signature Today's Date

and (both signatures please)

_____ / /
Board of Directors Chairperson's Signature Today's Date

Population by Poverty Status for Counties: 2010
Source: Census 2010 Sample Demographic Profiles

County Name	Total Population	Number in Poverty	Percent of Population at Poverty	Percent of State Poor Population
Abbeville	24,546	5,084	20.7121%	0.7095%
Aiken	154,153	25,661	16.6464%	3.5813%
Allendale	9,060	3,843	42.4172%	0.5363%
Anderson	179,494	28,348	15.7933%	3.9563%
Bamberg	14,957	4,475	29.9191%	0.6245%
Barnwell	22,587	5,742	25.4217%	0.8014%
Beaufort	147,975	15,564	10.5180%	2.1721%
Berkeley	166,034	20,987	12.6402%	2.9289%
Calhoun	15,117	2,389	15.8034%	0.3334%
Charleston	332,451	54,900	16.5137%	7.6619%
Cherokee	54,369	10,581	19.4615%	1.4767%
Chester	32,778	7,011	21.3893%	0.9785%
Chesterfield	45,730	10,368	22.6722%	1.4470%
Clarendon	33,063	7,592	22.9622%	1.0595%
Colleton	38,535	8,227	21.3494%	1.1482%
Darlington	67,312	13,438	19.9638%	1.8754%
Dillon	31,165	9,490	30.4508%	1.3244%
Dorchester	127,693	14,272	11.1768%	1.9918%
Edgefield	23,775	5,042	21.2072%	0.7037%
Fairfield	23,547	5,346	22.7035%	0.7461%
Florence	131,200	23,609	17.9947%	3.2949%
Georgetown	59,651	11,762	19.7180%	1.6415%
Greenville	423,997	59,885	14.1239%	8.3576%
Greenwood	67,292	11,851	17.6113%	1.6539%
Hampton	19,680	4,095	20.8079%	0.5715%
Horry	254,554	41,069	16.1337%	5.7316%
Jasper	22,078	4,750	21.5146%	0.6629%
Kershaw	59,495	9,221	15.4988%	1.2869%
Lancaster	70,664	14,407	20.3880%	2.0106%
Laurens	64,636	12,430	19.2308%	1.7347%
Lee	17,694	5,294	29.9197%	0.7388%
Lexington	250,115	27,676	11.0653%	3.8625%
McCormick	8,927	1,625	18.2032%	0.2268%
Marion	32,970	8,271	25.0864%	1.1543%
Marlboro	26,168	7,193	27.4878%	1.0039%
Newberry	36,049	5,995	16.6301%	0.8367%
Oconee	72,386	12,008	16.5888%	1.6758%
Orangeburg	88,100	22,689	25.7537%	3.1665%
Pickens	109,196	18,115	16.5894%	2.5281%
Richland	343,225	49,848	14.5234%	6.9568%
Saluda	19,446	2,941	15.1239%	0.4104%
Spartanburg	270,162	40,096	14.8415%	5.5958%
Sumter	104,004	20,156	19.3800%	2.8130%
Union	28,297	5,681	20.0763%	0.7928%
Williamsburg	33,667	11,088	32.9343%	1.5474%
York	211,153	26,422	12.5132%	3.6875%
Total	4,369,147	716,537		100%

APPENDIX J

SUBGRANTEE SEMI-ANNUAL NARRATIVE REPORT

(To be submitted for key activities/milestones where actual compared to projected vary by more than 20%)

A. Agency:_____

B. CSBG Program:_____

C. Goal: _____

_____

_____

D. Measure/Performance Target (Defines program achievement):_____

_____

E. Client Activity/Milestone: (#_____) _____

_____

F. Strategies Implemented/Learning/Assumptions: (during quarter completed) (What did you learn and/or have you already done something differently?) _____

_____

_____

G. Additional Course Corrections or Strategies: (for upcoming quarter) (What steps do you propose for next quarter to get closer to your activities/milestones, including technical assistance, staff training)? _____

_____

_____

H. Activity/Milestone Modification Requested (Do you request a revision?) _____

_____

_____

I. Effect on Measure/Performance Target Outcome Achievement: (if above modification is made) _____

_____

_____

J. Action or Revision Agreed to: _____

_____

_____

OEO ROMA REPORTING FORM

Section B: Description of Measures & Results		Circle One of the Below Quarterly Designations			
		1	2	3	4

Agency reporting: _____

Total CSBG Funding in agency reporting: $_____

Chart #_____ of 6 / Goal # _____ of 6

Measure (Performance Target)	Eligible Entities Reporting (#)	**Service Category**	**Type of Unit**	**Units (x of Target) (#)**	**Expected to Achieve the Outcome in Reporting Period (y of Target) (#)**	**Achieved (#)**	**Still Progressing Toward Outcome (Target) (#)**	**Exited Program Prior to Achieving Outcome (Target) (#)**
Column A	**Column B**	**Column C**	**Column D**	**Column E**	**Column F**	**Column G**	**Column H**	**Column I**

APPENDIX L

PY 2016 YOUTH LEADERSHIP PROGRAM

Parental Permission, Disclosure Authorization and Release Form

I give permission for my child to participate in the PY 2016 Youth Leadership Program that is being sponsored by (agency)__ _____. Additionally, I hereby authorize the agency officials to request, access, receive, apply, disseminate, etc., any information regarding my current household income to potential service providers (vendors, human service agencies, educational/religious/governmental organizations) as necessary to assist my household.

Parent/Guardian's Name _____ SSN _____

Student's Name _____ SSN _____

Address _____ Telephone _____

City, State, Zip Code _____ Grade _____

School Principal _____ Counselor_____

(Name of school)_____ has my permission to release information from my child's school records to (agency)_____. I understand that such information will be used in the PY 2016 Youth Leadership Program to service my child's needs.

_____ _____

Signature of Parent/Guardian Date

_____ _____

Signature of Witness Date

_____ _____

Signature of Agency Representative Date

PY 2016 YOUTH LEADERSHIP PROGRAM

Field Trip Permission Slip

(Student)_____ has my permission to participate in this planned field trip with the Youth Leadership Program. I will not hold (agency)_____ responsible in the event an accident should occur. The following field trip has been approved for:

Destination _____ Purpose _____

Departure Date/Time _____ Return Date/Time _____

Home Telephone _____ Emergency Telephone _____

Allergies _____ Medicines _____

Insurance Company _____ Policy #_____

Physician _____ Telephone_____

Physician's Address _____

_____ _____

Signature of Parent/Guardian Date

<u>Student's Contract</u>

I, (name of student)_____ agree to participate in a mature and responsible manner. I understand that if I am not dressed appropriately and have not returned my permission slip, I will not be allowed to attend this field trip.

_____ _____

Signature of Student Date

_____ _____

Signature of Agency Representative Date

South Carolina Youth Leadership Program Student
Pre Evaluation / Post Evaluation

Student Name: _____ Date: _____
School: _____ Grade: _____ Age: _____

For each statement respond by circling one answer. Your answer may range from (1) "not important" to (5) "very important."

Very Important
Important
Unsure
Somewhat Important
Not Important

	Not Important	Somewhat Important	Unsure	Important	Very Important
1. How important is it to you to be honest and direct?	○	○	○	○	○
2. How important is it to you to demonstrate commitment, courage and self-discipline?	○	○	○	○	○
3. How important is it for you to have integrity and keep your promises?	○	○	○	○	○
4. How important is self-respect?	○	○	○	○	○
5. How important is it to you to stand up for what is right, even if you stand alone?	○	○	○	○	○
6. How important is peer pressure to you in making your choices?	○	○	○	○	○
7. How important is it to you to know that your character is defined by what you do, not what you say or believe?	○	○	○	○	○
8. How important is it to you to understand that every choice you make has a consequence and others are often affected by your actions and decisions?	○	○	○	○	○
9. How important is it to you to stay focused, always do your best and not give up just because things seem difficult?	○	○	○	○	○
10. How important is it to you to listen to the opinions of others?	○	○	○	○	○
11. How important is it to you to treat all people fairly and equally?	○	○	○	○	○
12. How important is it to you to consider the feelings, cultures and differences of other people	○	○	○	○	○
13. How important is it to you to be thankful and express gratitude to others for what they do for you?	○	○	○	○	○ ○
14. How important is it to you to share with others?	○	○	○	○	○
15. How important is it to you to be kind, caring, helpful and compassionate?	○	○	○	○	○
16. How important is it to you to participate in community service?	○	○	○	○	○
17. How important is it to you to obey laws and respect authority?	○	○	○	○	○
18. How important is it to you to do your part in taking care of the environment?	○	○	○	○	

Carefully answer the following. There are no right or wrong answers. You need to identify what makes you a unique individual and to think about your life goals.

1. Make a list of all of the classes, activities, and clubs that you enjoy.

2. Identify three of your strongest skills (e.g. sports, music, academics, art, helping other people).

3. What five words would you use to describe yourself?

4. List three life goals that you have or would like to set for yourself (e.g. high school graduation, college graduation, employment, financial security, marriage, family, home ownership).

5. List three things that are important to you (e.g. spending time outdoors, sports, having a lot of money, boyfriend/girlfriend, having a nice car, attending school).

6. List your top 3 role models.

7. List two people with whom you enjoy spending time.

YLP Instructor: _____ Signature:_____

South Carolina Youth Leadership
Program Evaluation

Student Name: _____ Date: _____
School: _____ Grade: _____ Age: _____

To the student: During the school year you were selected to participate in the Youth Leadership Program using "Lessons In Character". Now we are asking that you let us know your honest opinion of the program.

For each statement respond by circling one answer. Your answer may range from (1) "strongly disagree" to (5) "strongly agree."

Strongly Agree
Agree
Slightly Agree
Slightly Disagree
Disagree
Strongly Disagree

	Strongly Disagree	Disagree	Slightly Disagree	Slightly Agree	Agree	Strongly Agree
1. Overall, the training that the "Lessons in Character" program provides is helpful to me.	○	○	○	○	○	○
2. The material provided to conduct the training was realistic and useful.	○	○	○	○	○	○
3. The instructor was knowlegeable of the material and prepared for each class.	○	○	○	○	○	○
4. As a result of this program my attitude and character have improved.	○	○	○	○	○	○
5. As a result of this program my schoolwork has improved.	○	○	○	○	○	○
6. I have had less discipline problems at home and in school as a result of this program.	○	○	○	○	○	○
7. This training has already been useful in my daily life.	○	○	○	○	○	○
8. This training has helped me resolve personal conflicts.	○	○	○	○	○	○
9. This training addresses social problems in my community.	○	○	○	○	○	○
10. I would recommend this program to my friends.	○	○	○	○	○	○
11.This program has given me hope for the future that I did not have before.	○	○	○	○	○	○
12. I have usually been on time and prepared for each session.	○	○	○	○	○	○
13. I have attended most or all of the sessions for this program.	○	○	○	○	○	○
14. I am enthusiatic about coming to the sessions for this program.	○	○	○	○	○	○
15. I have done everything to learn all I could from this program.	○	○	○	○	○	○
16. I can see a positive change in my classmates because of this program.	○	○	○	○	○	○
17. The instructor was concerned about me as an individual.	○	○	○	○	○	○
18. The instructor was understanding and respectful of my unique life circumstance.	○	○	○	○	○	○
19. The instructor was approachable and helpful.	○	○	○	○	○	○
20. This program provided internships or practical experiences.	○	○	○	○	○	○
21. The instructor set goals for me and helped me work toward them.	○	○	○	○	○	○
22. This training has been an enjoyable experience.	○	○	○	○	○	○

Please provide a general explanation of your answers to the above questions as a whole.

In your opinion, what can be done to improve this program.

List the most positive ideas you have gained from this program.

List any negative aspects of the program.

Other comments:

Signature:_____

Appendix N

OFFICE OF ECONOMIC OPPORTUNITY (OEO)

Community Services Block Grant (CSBG) Monitoring Instrument

Agency: _____ Executive Director: _____

CSBG Director: _____ OEO Coordinator: _____

Monitoring Review Dates: _____ Period Reviewed: _____

	Entrance Conference	YES	NO
*	Introduction of attendees. List: _____		
*	Explain purpose of visit.		
*	Are all required documents and materials provided upon arrival? List: _____		
*	Is an appropriate area set up and provided for the review?		
*	Are all files available for random sampling?		
*	Notes:		
	Agency's Program Services	**YES**	**NO**
*	Current CSBG Work Plan available at each county office site 676(b)(11)		
*	Agency is providing LIHEAP--676(b)(6)		
*	CSBG vehicles have appropriate agency logo affixed		
*	Vehicle tags, registration, insurance are current and logs provided. Mileage: Tag #: Condition:		
	GEAP	**YES**	**NO**
*	Agency is providing, on an emergency basis, for the provision of supplies and services 676(b)(4) (Total # clients served to date:_____)		
*	File documentation details how customer bills that exceed the amount of GEAP assistance provided will be paid.		
*	Maximum turn-around time for the issuance of assistance less than 72 hours		
*	Documentation in file to support type of assistance.		
	AGENCY CAPACITY--Section 676(b)(e)(C):	**YES**	**NO**
*	CSBG funds *are mobilized and leveraged* with other public and private resources--to help eliminate community poverty--672(2)(A) and 675(c)(1)(A)-(E) and 676(b)(3)(C)		
*	Agency is *coordinating programs and establishing linkages to fill identified gaps* in services between governmental and other social services programs to assure the effective delivery of services/programs and to avoid duplication of such services--676(b)(5) and 676(b)(3)(B)		
*	Agency is forming *partnerships* with other organizations serving low-income residents, *including religious organizations and charitable groups to broaden resource base*--672(2)(E) & 676(b)(9)		
*	Agency utilizes the "maximum feasible participation of the poor" concept in its planning process		
*	Agency is *using funds to support other innovative community and neighborhood-based initiatives* related to the purpose of the CSBG Act--676(b)(3)(D)		
*	Agency has *introduced efforts to reduce/eliminate cultural/language barriers* among staff and income-eligible customers		
*	Agency *files evidence agency publicizes programs/services routinely and widely throughout the service area* utilizing diverse media medium		
	Agency Planning and Operations	**YES**	**NO**

*		*Record retention:* Agency is retaining records for program activities for current year and three (3) years after submitting its final expenditure report		
*		Fair Hearings Procedure or Public Complaint Policy: Is policy available and posted visibly?		
		Has agency received any grievances regarding the fair use/distribution of grant funds? If so, did agency respond in a timely manner, following its Fair Hearings Procedure?		
*		*Monitoring and evaluation:* Report data/information provided to OEO in a concise and correct format, by date stipulated 678B(a)		
SC ROMA Utilization				
*		Agency participates in ROMA reporting system.		
*	a	Documentation/reports are complete and accurate and provided in timely manner with documented measurable outcomes for each initiative 678E(a)(1)(A)		
*	b	Include a breakdown of funds spent on administrative costs and on the delivery of local services, the number of low-income persons served, and demographic data on the populations served 678E(b)(2)(B)-(D) and 676(b)(12)		
*		Agency is utilizing the "live-intake' process.		
*		Agency database is routinely monitored for errors and corrections made.		
*		Monitoring of database results in improved usage and output of agency database.		
*		Agency is utilizing the fund management section of the system.		
*		Agency is utilizing the Goals and Evaluations section of the system.		
*		Agency staff is knowledgeable of running reports from the system.		
*		How is ROMA outcome data used to evaluate the effectiveness of agency programs and the agency's capacity to achieve results?		
Governance: Board of Directors (Section 676(b)10)			**Yes**	**No**
		Status of Board: # of Members Vacancies How Long Number of members in each sector: Poor Public Private		
*		Do the minutes reflect regularly scheduled meetings (announced in accordance with agency policy), open and accessible to the public? (*dates of minutes reviewed:_____)*		
		Does the board meet as scheduled? If not, why?		
*		Does the agency have a strategic plan? Who was involved in creating it? Is staff aware of the plan and how their jobs contribute to fulfilling the plan? (Dates covered: _____)		
*		Do board meetings include fiscal and audit reports by program and funding source?		
*		Has the Board of Directors received all audit and/or monitoring correspondences from other funding sources as well as the letters the CAA sent responding to funding sources?		
*		Do board meetings include Board committee reports?		
*		Do the minutes detail type of meeting, attendance, motions, votes and actions taken--indicate formal decisions?		
*		Is there a complete signed set of board minutes on file at the agency?		
*		Do board meetings contain Executive Director's Report?		
		Has board or board committee conducted annual performance evaluation of Executive Director?		
*		Is the board chair present for majority of meetings held year-to-date?		
*		Are board minutes complete, concise and signed by either the Board Chair or Board Secretary and accurately reflect the actions taken at board meetings – including documenting if quorum is attained and the exact wording of motions?		
*		What is the board's position if there is a quorum problem?		
		Do staff members other than Executive Director attend and present information at board meetings?		

NOTE: The Subgrantee is to be briefed on the observations and findings generated by the visit during the Exit Conference. Within thirty days after each visit, the OEO is to have prepared a written report summarizing the visit to send to the Subgrantee for corrective action, if applicable. Significant non-compliance findings are to be immediately reported to the OEO CSBG Senior Manager.

CSBG MONITORING REVIEW INSTRUMENT

Project Name / Area(s) of Need_____

(This form must be completed for each CSBG project provided by the agency)

		YES	NO	COMMENTS
1	Each customer file contains completed/dated OEO application forms documenting program eligibility, description of services, date(s) of service, referrals and where applicable, evidence of follow-up			
2	Total monthly household income documented			
3	Income information available for all household members 18 years of age and over			
4	Each "served" customer file contains income verification of 125% eligibility			
5	Information on household members complete			
6	Clients who are provided with medical assistance are required to present a letter or prescription from their physician			
7	Supporting documentation in file properly signed and dated			
8	Evidence in client files of coordination with other human service providers. [Agency Capacity #2—Agency is coordinating programs and establishing linkages to fill identified gaps in services between governmental and other social services programs to assure the effective delivery of services/programs and to avoid duplication of such services—676(b)(5) and 676(b)(3)(B)]			
9	Referrals being given to other household members, also			
10	Follow-up information on referrals documented in the file			
11	Agency is coordinating the provision of employment and training activities with area and State entities through the workforce investment system under the Workforce Investment Act (WIA) of 1988—676(b)(5)			
12	Program components, activities/services (service delivery system is in place) are being provided as proposed in the approved work plan 678D(a)(A)			
13	Program staff knowledge of program objectives and activities is evident and projected year-to-date have been completed			
14	Program staff demonstrating achievement of measurable outcomes for each program as outlined in the approved work plan and year-to-date outcomes have been achieved			
15	Customers accurately represent the ethnic diversity of the service territory			
16	The number of customers projected to be served for the program year will be achieved/exceeded by program year-end			
17	Self-Certification/Zero Income acknowledged/validated			
18	Expenditures proportionate by county			
19	Agency payments made on behalf of customers by two-party check or OEO approved voucher			

Reviewer's Comments / T&TA needed and/or requested / results and/or follow-up required because of T&TA:

Total # of households served to date: _____ Total # of individuals:_____

Proposed # to-date: _____ Proposed # to-date:_____

Total program funds: Expended _____ Committed _____ Balance _____

_____

_____

Customer Interview(s):

Customer's Name: _____

Date of last Agency Visit:_____

How did you hear about this program?

Did the agency personnel inform you of other available services?

Was the interview conducted in a courteous and professional manner?

What type of assistance will be provided you by the agency?

If you were denied service, did the agency provide you with an explanation and were you advised of your right to appeal?

Has the agency informed you they will/will not follow-up on your case?

What suggestion(s) would you have that might help improve the agency's service delivery?

CSBG MONITORING REVIEW INSTRUMENT—Exit Conference

Attendees:

Name	**Title**

Positives:	
1	
2	
3	
4	

Findings:	
1	
2	
3	
4	

Corrections made on site:	
1	
2	
3	
4	

Corrections to be made / made by: _____

Date of next visit: _____

Comments:	
1	
2	
3	
4	

Unresolved concerns:		**Date to Respond**
1		
2		
3		
4		

APPENDIX O

U.S. Department of Health and Human Services
Administration for Children and Families
Office of Community Services
Division of State Assistance
370 L'Enfant Promenade, S.W.
Washington, D.C. 20447

BLOCK GRANT

Information Memorandum

Transmittal No. 138 **Date: January 26, 2015**

TO: State Community Services Block Grant (CSBG) Administrators, U. S. Territory CSBG Administrators, Eligible Entities, and State Community Action Associations

SUBJECT: State Establishment of Organizational Standards for CSBG Eligible Entities under 678B of the CSBG Act, 42 U.S.C. § 9914

RELATED REFERENCES: Community Services Block Grant Act 42 U.S.C. § 9901 *et seq.*, hereafter referred to as "the CSBG Act."

This information memorandum (IM) provides guidance and describes State and Federal roles and responsibilities for the establishment of organizational standards as a component of a larger performance management and accountability system for CSBG. Consistent with the authority and responsibilities the CSBG Act establishes for the Federal office and States, OCS is requiring States, no later than FY 2016, to establish and report on their organizational standards for CSBG eligible entities as part of an enhanced system for accountability and performance management across the CSBG Network.

While States have discretion on the set of standards they may use, OCS recommends States use the organizational standards (Appendices 2 and 3) developed by the OCS-supported CSBG Organizational Standards Center of Excellence (COE), which reflect the requirements of the CSBG Act, good management practices, and the values of Community Action. These standards will ensure CSBG eligible entities have appropriate organizational capacity to deliver services to low-income individuals and communities.

The guidance in this IM applies to States, the District of Columbia, and U.S. Territories that support CSBG eligible entities. Tribal governments and organizations that receive CSBG directly from the Federal government are not included in this guidance, but will receive future guidance on a separate accountability and reporting process.

State Authority and Responsibility to Establish Organizational Standards

Under the block grant framework established in the CSBG Act, States have both the authority and the responsibility for effective oversight of eligible entities that receive CSBG funds.
Section 678B of the CSBG Act (42 U.S.C. § 9914) requires State CSBG Lead Agencies to establish "performance goals, administrative standards, financial management requirements, and other requirements" that ensure an appropriate level of accountability and quality among the ntities. In order for States to meet these responsibilities under the CSBG Act,

States must establish and communicate clear and comprehensive standards and hold eligible entities accountable according to the standards as part of their oversight duties.

Federal Authority and Responsibility for Organizational Standards

As the Federal office responsible for oversight of CSBG, the Office of Community Services (OCS) is responsible for monitoring to assure State compliance with the requirements of the CSBG Act and for providing training and technical assistance to help States carry out the requirements of the CSBG Act. Section 678B(c) (42 U.S.C. § 9914(c)) directs the U.S. Department of Health and Human Services (HHS) to conduct evaluations of the use of CSBG funds received by the States. Section 678A(a) (42 U.S.C 9913(a)) requires HHS to support training and technical assistance activities to assist States in monitoring activities to correct programmatic deficiencies of eligible entities, and for reporting and data collection activities.

Several sections of the CSBG Act provide authority or require OCS to collect information from States as part of the State plan or annual report regarding how the State will meet requirements of the CSBG Act. Section 676(b) (42 U.S.C. § 9908(b)) outlines authority for the collection of necessary information as part of a State application and plan. The statute provides the authority to collect "such information as the Secretary shall require," including a series of detailed assurances based on the requirements of the CSBG Act. To assure effective use of funds to meet the purposes of the statute, section 676(d) (42 U.S.C. § 9908(d)) states that the "Secretary may prescribe procedures for the purpose of assessing effectiveness of the eligible entities in carrying out the purpose of [the CSBG Act]."

Performance Management for CSBG

Budget constraints, high poverty levels, changing demographics, and income inequality demand that the CSBG Network remain vigilant in our shared mission of creating opportunity and security for all Americans. We must look at all levels of the CSBG Network – local, State, and Federal – to assess and increase CSBG's impact. The CSBG Network is far-reaching and nationwide. Together, we have the potential to achieve even greater results, in every community, by improving our accountability to one another, our customers, and our communities.

In an effort to help the CSBG Network increase accountability and achieve results, OCS launched several initiatives in 2012. One focused on establishing organizational standards for eligible entities. Under this effort, CSBG Network leaders developed and recommended a set of organizational standards to strengthen the capacity of the more than 1,000 eligible entities providing services across the country.

A second performance management initiative focused on enhancing the CSBG Network's performance and outcomes measurement system for local eligible entities – identified in the CSBG Act as Results Oriented Management and Accountability System (ROMA). Finally, a third initiative focused on creating State and Federal-level accountability measures to track and measure organizational performance by State CSBG Lead Agencies and OCS.

These three efforts are complementary and integrated; together they comprise a network-wide accountability and management system for CSBG. They will ensure eligible entities, States, and OCS operate within Federal law and regulation and will build accountability and continuous management improvement into all three levels of the network (local, State and Federal). As shown in Appendix 1, *Measuring the Success of Community Action and CSBG*, these efforts will help us answer the questions, 'How well did the Network perform?' and 'What difference did the Network make?' Ultimately, using these new and enhanced tools and information, the CSBG Network will make better program decisions and generate stronger results for low-income families and communities.

Organizational Standards for CSBG Eligible Entities - Background

In 2012, OCS funded a cooperative agreement for the CSBG Organizational Standards Center of Excellence (COE). The two-year cooperative agreement coordinated – with input from local, State, and national partners – the development and dissemination of a set of organizational standards for eligible entities for the purpose of ensuring that all CSBG eligible entities have the capacity to provide high-quality services to low-income individuals and communities.

To begin the project, the COE expanded an existing CSBG Working Group from its original 20 members to over 50 individuals. The expanded working group included a balanced representation from eligible entities, State CSBG Lead Agencies, Community Action State Associations, national partners, technical assistance providers, and external content experts.

The working group's first task was a thorough environmental scan and analysis of existing organizational oversight tools and resources, internal and external to the CSBG Network. The group found that while there are many similarities across States in how State CSBG Lead Agencies monitor eligible entities, substantial differences also exist.

The project continued through a nine-month development process that provided numerous opportunities for input by the CSBG Network, including financial and legal experts, on draft organizational standards. All together, the network invested over 3,500 documented hours in Working Group and committee meetings and in national and regional listening sessions. The final phase included a pilot that engaged a subset of State CSBG Lead Agencies and eligible entities in a field test of draft organizational standards and tools.

In March, 2014, OCS published a draft information memorandum with the draft organizational standards. OCS received 29 sets of comments (approximately 160 individual comments) from a broad range of individuals and organizations, including six CAAs; 12 states; five state associations; and six national organizations and individuals, and integrated all of this feedback into the final set of organizational standards.

The final result of the COE and OCS efforts is a comprehensive set of organizational standards developed *by* the CSBG Network *for* the CSBG Network. The CSBG Network is to be commended for its commitment to ongoing performance improvement and strengthening accountability.

The COE-developed Organizational Standards

The COE-developed standards are organized in three thematic groups comprising nine categories and totals of 58 standards for private, nonprofit eligible entities and 50 for public entities.

1. Maximum Feasible Participation
   - Consumer Input and Involvement
   - Community Engagement
   - Community Assessment

2. Vision and Direction
   - Organizational Leadership
   - Board Governance
   - Strategic Planning

3. Operations and Accountability
   - Human Resource Management
   - Financial Operations and Oversight
   - Data and Analysis

In order to be widely applicable across the CSBG Network, the standards are defined differently for private and public eligible entities. The complete description and list of private and public organizational standards are attached as Appendices 2 and 3, respectively.

All of the COE-developed organizational standards work together to characterize an effective and healthy organization. Some of the standards have direct links to the CSBG Act, such as the standards on the tripartite board structure and the democratic selection process. Some standards link with U.S. Office of Management and Budget (OMB) guidance, such as the standards on audits. As a whole, the standards reflect many of the requirements of the CSBG Act, applicable Federal laws and regulations, good management practices, and the values of Community Action.

The purpose of the organizational standards is to ensure that all eligible entities have appropriate organizational capacity, not only in the critical financial and administrative areas important to all nonprofit and public human service agencies, but also in areas of unique importance for CSBG- funded eligible entities. To fulfill the promise of the standards, States must provide consistent and high-quality oversight and technical assistance related to organizational standards. In addition, based on information about organizational capacity, States must work with the eligible entities to make informed programmatic decisions about how the agencies can best meet the needs of local low-income families and communities.

States and eligible entities that implement the COE standards will benefit from COE-developed tools, training, and technical assistance, and from the collective wisdom and scale of having many States using common standards (detailed tools and materials on the standards are available on the COE web page on the Community Action Partnership website). States using the COE standards will also benefit from a streamlined State plan process.

State Oversight

Section 678B of the CSBG Act (42 U.S.C. § 9914) requires State CSBG Lead Agencies to establish "performance goals, administrative standards, financial management requirements, and other requirements" that ensure an appropriate level of accountability and quality among the State's eligible entities. The purpose of States using the organizational standards is to ensure each eligible entity has appropriate organizational capacity to fulfill the purposes of the CSBG Act. As noted below, States have discretion to determine how organizational standards will be implemented as part of their overall oversight strategy.

Assessment of Standards

Once the expectations for organizational standards are established and communicated to the eligible entities across a State, the State CSBG Lead Agency is responsible for assessing the status of standards among all of the eligible entities annually and for reporting to OCS on the standards in the CSBG Annual Report. States may design an approach for assessing organizational standards that fits within the oversight framework in their State. Many States may integrate standards assessment into their regular CSBG monitoring procedures, while other States may choose different oversight approaches, such as peer-review, assessment by a consultant or third party, or self-assessment. Some States may also choose a hybrid approach involving two or more strategies. Regardless of the approach, States must ensure the assessment of standards is independently verified by the State or a third party.

For example, a State on a triennial monitoring cycle may decide to assess the standards as part of their full onsite financial, administrative, and programmatic monitoring protocol. In the years between monitoring visits, the State may require entities to do self-assessments that are independently verified by a third party. In another example, a State may develop a process that includes peer review assessment that is then verified annually during regular State monitoring visits or a State desk review process.

States will describe their approach for assessing standards in their State plans, which will be subject to OCS review. Promising practices and other tools on integrating such assessment into a State's oversight strategy will be available on the COE web page on the Community Action Partnership website.

States are responsible for ensuring that the eligible entities meet all State-established organizational standards. Some standards (i.e., strategic planning, developing an agency-wide budget, etc.) may take several years for eligible entities to meet, but every entity must make steady progress toward the goal of meeting all standards.

Corrective Action

During the assessment process, if a State finds an eligible entity is not meeting a standard or set of standards, the State's response will depend on the circumstances. In cases where the eligible entity may be able to meet the standard in a reasonable time frame contingent on some targeted technical assistance, the State and entity may develop a technical assistance plan to target

training and technical assistance resources and outline a time frame for the entity to meet the standard(s). If appropriate in other situations, the State may initiate action in accordance with section 678C of the CSBG Act (42 U.S.C. § 9915), including the establishment of a Quality Improvement Plan (QIP) with clear timelines and benchmarks for progress.

As long as the State is confident that the eligible entity is moving toward meeting standards, under a technical assistance plan, QIP, or other oversight mechanism, the State should not initiate action to terminate or reduce funding.

The failure of an eligible entity to meet multiple standards may reflect deeper organizational challenges and risk. In those cases, a State must determine whether it may be necessary to take additional actions, including reducing or terminating funding, in accordance with CSBG IM 116 (*Corrective Action, Termination, or Reduction of Funding*), issued May 1, 2012. OCS and States do not have the authority under the CSBG Act to bypass the process described in CSBG IM 116 in order to re-compete CSBG funding based on failure to meet organizational standards.

Implementation of Organizational Standards

The roll-out of organizational standards for eligible entities is a significant development in the history of CSBG and marks a new phase in our ability to strengthen accountability and results. While we expect States to move expeditiously in integrating organizational standards into their plans in FY 2016, we also recognize that States must manage this process thoughtfully so as to minimize unintended impact on their operations and those of the eligible entities.

State Considerations for an Effective Roll-out Process

As States establish new organizational standards for their eligible entities, they must follow a process that is consistent with State rules and is as fair and reasonable as possible. States should allow for input from the boards and leadership of eligible entities on the timing and procedures for implementing, documenting, and reporting on the standards. States should consistently integrate the organizational standards in State CSBG plans, contracts with eligible entities, funding documents, and oversight and monitoring instruments and reports. In particular, States should clearly communicate expectations around organizational standards prior to State oversight and monitoring activities. Once established, a State should only modify organizational standards based on established State rules and procedures that are publicly communicated and transparent (see Appendix 4: State Implementation of Organizational Standards – Key Considerations).

Process and Timing for Planning and Roll-out

States are expected to use organizational standards for assessing eligible entities starting in FY 2016. In order to do this, States must include information about organizational standards in their FY 2016 application and State plan, due September 1, 2015.

OCS encourages States to start planning for this process now, in FY 2015, particularly if State procedures for establishing official organizational standards may require a lengthy implementation period. For example, if a State uses regulation to establish official CSBG policy

for the eligible entities, the State may want to begin that process in advance of the FY 2016 CSBG application cycle. The timelines for any necessary rulemaking, including any potential obstacles that would prevent full implementation by FY 2016, must be described in the State plan. OCS will work with States that may need additional time due to rulemaking issues.

Any State that submitted a two-year plan for FY 2015 (due September 1, 2014) that did not include organizational standards for FY 2016 will have to submit a supplemental application for FY 2016 that includes organizational standards. This submission will be incorporated into the process for the FY 2016 submission of the State's 424-M application, which States must submit annually online in order to receive CSBG funding.

CSBG Model State Plan and Annual Report

The CSBG Model State Plan and CSBG Annual Report are interconnected and work together to provide critical information to OCS, Congress, and other stakeholders. The CSBG Model State Plan establishes the plans and goals for the performance period, and the annual report cycle provides information on the State's progress toward fulfilling those goals. OCS envisions the Model State Plan to work together with the annual report to provide critical performance management information – including that of organizational standards – to be used by all three levels of the CSBG Network.

In accordance with authorities outlined in Section 676(b) of the CSBG Act (42 U.S.C. § 9908(b)), OCS is revising the Model State Plan for the FY 2016 application cycle (for applications due September 1, 2015) to incorporate items related to organizational standards. OCS will review these elements during the usual State plan review process. Because the COE standards are designed as a comprehensive and complete set, any State that proposes making a minor modification to the standards must document the rationale for the change in their State plan and reports; and any modification to the COE standards will be subject to OCS review.

The revised Model State Plan will require the State to describe:

- whether the State is using the COE-developed organizational standards (and any modifications, if applicable);
- alternative organizational standards, if applicable;
- the process for establishing organizational standards officially in the State (e.g., through State regulation, contract terms and conditions, or other official policy documents), including a timeline;
- the approach for assessing eligible entities against standards;
- procedures for corrective action activities based on organizational standards; and
- exceptions for limited purpose or very small eligible entities, if applicable.

States will report on the status of eligible entities based on organizational standards through the required CSBG Annual Report. In past years, States may have fulfilled their annual reporting requirements, under section 678E(a)(2) of the CSBG Act (42 U.S.C. § 9917(a)(2)), by providing data for the CSBG Information Survey. In the future, OCS will provide new instructions for States regarding annual reporting.

OCS will be revising the Annual Report forms to include information on organizational standards, such as a comparison of the State's actual activities and performance on organizational standards to the planned activities and performance in the State plan. The Annual Report forms will also include data on the new State CSBG Accountability Measures.

Alternative Organizational Standards

Some States may already have highly developed standards in place that may function well in fulfillment of State oversight requirements under the CSBG Act. In these cases, a State may establish and communicate organizational standards for its eligible entities that are different from the COE-developed standards.

However, a State that uses an alternative set of standards must demonstrate that the standards are at least as rigorous and comprehensive as the organizational standards developed by the COE. If a State establishes a different set of organizational standards, the alternative standards must encompass requirements of the CSBG Act and other Federal requirements, such as those found in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 C.F.R. Part 200), and should address the nine categories listed in the description of the COE-developed standards (e.g., consumer input and involvement, community engagement, etc.). OCS will review alternative standards during the application and State plan review process.

Exceptions for Limited-purpose Agencies and Special Circumstances

While the COE-developed organizational standards and related tools and materials are applicable to the vast majority of public and private CSBG eligible entities across the network, OCS recognizes that some States, according to their historical CSBG structure or other factors, may provide CSBG funds to certain entities for which the organizational standards may not be appropriate. These entities may include limited purpose agencies, State-funded tribal organizations, and migrant and seasonal farmworker organizations. In addition, organizational standards may not be applicable to entities with very small overall budgets (e.g., under $50,000) or entities that receive very minor CSBG allocations (e.g., $15,000).

In these special circumstances, States should assess both the applicability of the standards and the administrative burden for very small entities. States should also assess whether these agencies that are unable to meet the organizational standards are otherwise equipped to meet the purposes and goals of the CSBG Act, and whether alternative approaches, such as shared administrative supports or mergers, should be considered in order to assure appropriate capacity.

States may describe the rationale for not implementing the COE-developed or alternative organizational standards for these specific entities in their State plan, which will be subject to OCS review. However, as appropriate, States should describe other types of appropriate standards for excepted entities in order to ensure performance and accountability appropriate to the specific purpose and scope of the Federal support.

State Accountability Measures on Organizational Standards

States will report on organizational standards in part by using the new CSBG State Accountability Measures. These new accountability measures will require States to track data such as the percentage of eligible entities that met 100 percent of the organizational standards during the performance period and information on technical assistance plans and Quality Improvement Plans for eligible entities not meeting the standards during the performance period.

OCS is incorporating the State Accountability Measures into the CSBG Model State Plan and CSBG Annual Report forms and will clear them through the U.S. Office of Management and Budget (OMB). For more information on the CSBG State and Federal Accountability Measures, including the specific measures related to organizational standards, see the draft IM, *State and Federal Accountability Measures and Data Collection Modernization*.

CSBG Network Review and OMB Paperwork Reduction Act Clearance Process

As noted earlier, OCS is currently revising the Model State Plan and the CSBG Annual Report forms to incorporate performance management elements, as well as to create forms that are better integrated, web-based, and streamlined. OCS has and will continue to seek input from States and other CSBG Network stakeholders on the clarity, usability, and effectiveness of the revised documents.

As a part of this effort, OCS must clear the revised forms through OMB, as required under the Paperwork Reduction Act of 1995 (PRA). The PRA requires agencies and OMB to ensure that information collected from the public minimizes burden and maximizes practical utility. The OMB/PRA review and approval process includes a 60-day and a 30-day public comment period. For more information about the OMB/PRA clearance process, please see the Frequently Asked Questions on the U.S. Department of Health and Human Services website.

The COE-developed organizational standards themselves will not go through a formal OMB/PRA clearance process. Rather, OCS will clear elements related to the organizational standards (such as implementation plans, data collection for the accountability measures, etc.) that are incorporated in the CSBG Model State Plan and the CSBG Annual Report forms.

OCS expects to initiate the OMB/PRA clearance process for the CSBG Model State Plan in early 2015. Concurrently, we will begin automating the Model State Plan so that States can access it through the ACF Online Data Collection (OLDC) system. We anticipate States will use the online version of the revised Model State Plan for the FY 2016 application cycle (for applications due September 1, 2015).

Below is information on implementation timing and roll-out of the organizational standards for OCS, States, and eligible entities. If you have questions, please contact an OCS CSBG specialist. The list of OCS staff and contact information is posted on the OCS website at www.acf.hhs.gov/programs/ocs/resource/csbg-staff-assignments-by-region.

OCS Responsibilities

Responsibilities	**Time Frame**
CSBG Model State Plan: Complete the first revision with CSBG Network input	Fall 2014
Final IM on Organizational Standards: Publish	January 2015
CSBG Model State Plan: Program into the ACF Online Data Collection (OLDC) system	Approximately 6 months winter 2015 – spring 2015
CSBG Model State Plan: Request public comments; get HHS and OMB approval	Approximately 6 months winter 2015 – spring 2015
CSBG Model State Plan: Publish and provide training and technical assistance	Spring/summer 2015
Annual Report: Revise, automate, and get OMB approval; with the National Association for State Community Services Programs (NASCSP)	2015 - 2016

Note: Dates above are contingent on the time frame for final OMB/PRA clearance.

State Responsibilities

Responsibilities	**Time Frame**
Organizational Standards: Establish, communicate, and	2015
CSBG Model State Plan: Include organizational standards (States will submit State Plans through the OLDC system)	Due by September 1, 2015
Organizational Standards: Assess through established oversight procedures	Starting Federal Fiscal Year 2016
Annual Report: Report performance on organizational standards (State accountability measures)	End of 2016 performance period, by March 2017, as appropriate

CSBG Eligible Entity Responsibilities

Responsibilities	**Time Frame**
Organizational Standards: Self-assessment and planning for adoption of standards	2015
Organizational Standards: Assess through established State oversight procedures; Address identified weaknesses and share exceptional practices, with State and technical assistance providers	Starting Federal Fiscal Year 2016

Conclusion

Together we must insist upon accountability and performance management across the CSBG Network. The COE-developed organizational standards have the potential to protect and enhance the structural integrity of this national network by assuring that all entities that annually receive CSBG funds have the capacity to organize and support a comprehensive community response to the complex social problems that contribute to poverty.

/s/

Jeannie L. Chaffin Director
Office of Community Services

Appendices:

Appendix 1: Measuring the Success of Community Action and CSBG
Appendix 2: COE-developed Organizational Standards for Private, Nonprofit CSBG Eligible Entities
Appendix 3: COE-developed Organizational Standards for Public CSBG Eligible Entities
Appendix 4: State Implementation of Organizational Standards – Key Considerations

Appendix 1: Measuring the Success of Community Action and CSBG

Appendix 2: COE-developed Organizational Standards for Private, Nonprofit CSBG Eligible Entities

ORGANIZATIONAL STANDARDS FOR PRIVATE, NONPROFIT CSBG ELIGIBLE ENTITIES

MAXIMUM FEASIBLE PARTICIPATION

Category one: Consumer Input and Involvement

Community Action is rooted in the belief that people with low incomes are in the best position to express what they need to make a difference in their lives. CSBG eligible entities work in partnership with the people and communities they serve. Community Action works in a coordinated and comprehensive manner to develop programs and services that will make a critical difference in the lives of participants. Individuals and families are well attuned to what they need, and when Community Action taps into that knowledge, it informs our ability to implement high-impact programs and services.

Research shows that through engagement in community activities such as board governance, peer to peer leadership, advisory bodies, volunteering, and other participatory means, the poor build personal networks and increase their social capital so that they are able to move themselves and their families out of poverty. Community Action is grounded in helping families and communities build this social capital for movement to self-sufficiency.

Standard 1.1 • private The organization demonstrates low-income individuals' participation in its activities.

Standard 1.2 • private The organization analyzes information collected directly from low-income individuals as part of the community assessment.

Standard 1.3 • private The organization has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the governing board.

Category two: Community Engagement

No CSBG eligible entity can meet all of a community's needs independently. Through formal and informal partnerships, ongoing community planning, advocacy, and engagement of people with low incomes, partners ranging from community and faith-based organizations, educational institutions, government, and business work together with Community Action Agencies and other CSBG eligible entities to successfully move families out of poverty and revitalize communities.

Community Action is often the backbone organization of community efforts to address poverty and community revitalization: leveraging funds, convening key partners, adding the voice of the underrepresented, and being the central coordinator of efforts. It is not an easy role to play, but a vital one for families and communities.

Standard 2.1 • private The organization has documented or demonstrated partnerships across the community, for specifically identified purposes; partnerships include other anti-poverty organizations in the area.

Standard 2.2 • private The organization utilizes information gathered from key sectors of the community in assessing needs and resources, during the community assessment process or other times. These sectors would include at minimum: community-based organizations, faith- based organizations, private sector, public sector, and educational institutions.

Standard 2.3 • private The organization communicates its activities and its results to the community.

Standard 2.4 • private The organization documents the number of volunteers and hours mobilized in support of its activities.

Category three: Community Assessment

Local control of Federal CSBG resources is predicated on regular comprehensive community assessments that take into account the breadth of community needs as well as the partners and resources available in a community to meet these needs. Regular assessment of needs and resources at the community level is the foundation of Community Action and a vital management and leadership tool that is used across the organization and utilized by the community to set the course for both CSBG and all agency resources.

Standard 3.1 • private The organization conducted a community assessment and issued a report within the past 3 years.

Standard 3.2 • private As part of the community assessment, the organization collects and includes current data specific to poverty and its prevalence related to gender, age, and race/ethnicity for their service area(s).

Standard 3.3 • private The organization collects and analyzes both qualitative and quantitative data on its geographic service area(s) in the community assessment.

Standard 3.4 • private The community assessment includes key findings on the causes and conditions of poverty and the needs of the communities assessed.

Standard 3.5 • private The governing board formally accepts the completed community assessment.

VISION AND DIRECTION

Category four: Organizational Leadership

Community Action leadership is exemplified at all levels across the organization and starts with a mission that clarifies Community Action's work on poverty. A well-functioning board, a focused chief executive officer (CEO)/executive director, well-trained and dedicated staff, and volunteers giving of themselves to help others will establish Community Action as the cornerstone and leverage point to address poverty across the community. Ensuring strong leadership both for today and into the future is critical.

This category addresses the foundational elements of mission as well as the implementation of the Network's model of good performance management (ROMA). It ensures CAAs have taken steps to plan thoughtfully for today's work and tomorrow's leadership.

Standard 4.1 • private The governing board has reviewed the organization's mission statement within the past 5 years and assured that:

1. The mission addresses poverty; and
2. The organization's programs and services are in alignment with the mission.

Standard 4.2 • private The organization's Community Action plan is outcome-based, anti-poverty focused, and ties directly to the community assessment.

Standard 4.3 • private The organization's Community Action plan and strategic plan document the continuous use of the full Results Oriented Management and Accountability (ROMA) cycle or comparable system (assessment, planning, implementation, achievement of results, and evaluation). In addition, the organization documents having used the services of a ROMA-certified trainer (or equivalent) to assist in implementation.

Standard 4.4 • private The governing board receives an annual update on the success of specific strategies included in the Community Action plan.

Standard 4.5 • private The organization has a written succession plan in place for the CEO/executive director, approved by the governing board, which contains procedures for covering an emergency/unplanned, short-term absence of 3 months or less, as well as outlines the process for filling a permanent vacancy.

Standard 4.6 • private An organization-wide, comprehensive risk assessment has been completed within the past 2 years and reported to the governing board.

Category five: Board Governance

Community Action boards are uniquely structured to ensure maximum feasible participation by the entire community, including those the network serves. By law, Community Action boards are comprised of at least 1/3 low-income consumers (or their representatives), 1/3 elected officials (or their appointees), and the remainder private-sector community members. To make this structure work as intended, CAAs must recruit board members thoughtfully, work within communities to promote opportunities for board service, and orient, train, and support them in their oversight role. Boards are foundational to good organizational performance and the time invested to keep them healthy and active is significant, but necessary.

Standard 5.1 • private The organization's governing board is structured in compliance with the CSBG Act:

1. At least one third democratically-selected representatives of the low-income community;
2. One-third local elected officials (or their representatives); and
3. The remaining membership from major groups and interests in the community.

Standard 5.2 • private The organization's governing board has written procedures that document a democratic selection process for low-income board members adequate to assure that they are representative of the low-income community.

Standard 5.3 • private The organization's bylaws have been reviewed by an attorney within the past 5 years.

Standard 5.4 • private The organization documents that each governing board member has received a copy of the bylaws within the past 2 years.

Standard 5.5 • private The organization's governing board meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its bylaws.

Standard 5.6 • private Each governing board member has signed a conflict of interest policy within the past 2 years.

Standard 5.7 • private The organization has a process to provide a structured orientation for governing board members within 6 months of being seated.

Standard 5.8 • private Governing board members have been provided with training on their duties and responsibilities within the past 2 years.

Standard 5.9 • private The organization's governing board receives programmatic reports at each regular board meeting.

Category six: Strategic Planning

Establishing the vision for a Community Action Agency is a big task and setting the course to reach it through strategic planning is serious business. CSBG eligible entities take on this task by looking both at internal functioning and at the community's needs. An efficient organization knows where it is headed, how the board and staff fit into that future, and how it will measure its success in achieving what it has set out to do. This agency-wide process is board-led and ongoing. A "living, breathing" strategic plan with measurable outcomes is the goal, rather than a plan that gets written but sits on a shelf and stagnates. Often set with an ambitious vision, strategic plans set the tone for the staff and board and are a key leadership and management tool for the organization.

Standard 6.1 • private The organization has an agency-wide strategic plan in place that has been approved by the governing board within the past 5 years.

Standard 6.2 • private The approved strategic plan addresses reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient.

Standard 6.3 • private The approved strategic plan contains family, agency, and/or community goals.

Standard 6.4 • private Customer satisfaction data and customer input, collected as part of the community assessment, is included in the strategic planning process.

Standard 6.5 • private The governing board has received an update(s) on progress meeting the goals of the strategic plan within the past 12 months.

OPERATIONS AND ACCOUNTABILITY

Category seven: Human Resource Management

The human element of Community Action's work is evident at all levels of the organization and the relationship an organization has with its staff often reflects the organization's values and mission. Oversight of the chief executive officer (CEO)/executive director and maintaining a strong human resources infrastructure are key responsibilities of board oversight. Attention to organizational elements such as policies and procedures, performance appraisals, and training lead to strong organizations with the capacity to deliver high-quality services in low-income communities.

Standard 7.1 • private The organization has written personnel policies that have been reviewed by an attorney and approved by the governing board within the past 5 years.

Standard 7.2 • private The organization makes available the employee handbook (or personnel policies in cases without a handbook) to all staff and notifies staff of any changes.

Standard 7.3 • private The organization has written job descriptions for all positions, which have been updated within the past 5 years.

Standard 7.4 • private The governing board conducts a performance appraisal of the CEO/executive director within each calendar year.

Standard 7.5 • private The governing board reviews and approves CEO/executive director compensation within every calendar year.

Standard 7.6 • private The organization has a policy in place for regular written evaluation of employees by their supervisors.

Standard 7.7 • private The organization has a whistleblower policy that has been approved by the governing board.

Standard 7.8 • private All staff participate in a new employee orientation within 60 days of hire.

Standard 7.9 • private The organization conducts or makes available staff development/training (including ROMA) on an ongoing basis.

Category eight: Financial Operations and Oversight

The fiscal bottom line of Community Action is not isolated from the mission, it is a joint consideration. Community Action boards and staff maintain a high level of fiscal accountability through audits, monitoring by State and Federal agencies, and compliance with Federal Office of Management Budget circulars. The management of Federal funds is taken seriously by CSBG eligible entities and the Standards specifically reflect the board's oversight role as well as the day-to-day operational functions.

Standard 8.1 • private The organization's annual audit (or audited financial statements) is completed by a Certified Public Accountant on time in accordance with Title 2 of the Code of Federal Regulations, Uniform Administrative Requirements, Cost Principles, and Audit Requirement (if applicable) and/or State audit threshold requirements.

Standard 8.2 • private All findings from the prior year's annual audit have been assessed by the organization and addressed where the governing board has deemed it appropriate.

Standard 8.3 • private The organization's auditor presents the audit to the governing board.

Standard 8.4 • private The governing board formally receives and accepts the audit.

Standard 8.5 • private The organization has solicited bids for its audit within the past 5 years.

Standard 8.6 • private The IRS Form 990 is completed annually and made available to the governing board for review.

Standard 8.7 • private The governing board receives financial reports at each regular meeting that include the following:

1. Organization-wide report on revenue and expenditures that compares budget to actual, categorized by program; and
2. Balance sheet/statement of financial position.

Standard 8.8 • private All required filings and payments related to payroll withholdings are completed on time.

Standard 8.9 • private The governing board annually approves an organization-wide budget.

Standard 8.10 • private The fiscal policies have been reviewed by staff within the past 2 years, updated as necessary, with changes approved by the governing board.

Standard 8.11 • private A written procurement policy is in place and has been reviewed by the governing board within the past 5 years.

Standard 8.12 • private The organization documents how it allocates shared costs through an indirect cost rate or through a written cost allocation plan.

Standard 8.13 • private The organization has a written policy in place for record retention and destruction.

Category nine: Data and Analysis

The Community Action Network moves families out of poverty every day across this country and needs to produce data that reflect the collective impact of these efforts. Individual stories are compelling when combined with quantitative data: *no data without stories and no stories without data*. Community Action needs to better document the outcomes families, agencies, and communities achieve. The Community Services Block Grant funding confers the obligation and opportunity to tell the story of agency-wide impact and community change, and in turn the impact of the Network as a whole.

Standard 9.1 • private The organization has a system or systems in place to track and report client demographics and services customers receive.

vate The organization has a system or systems in place to track family, agency, and/or community outcomes.

Standard 9.3 • private The organization has presented to the governing board for review or action, at least within the past 12 months, an analysis of the agency's outcomes and any operational or strategic program adjustments and improvements identified as necessary.

Standard 9.4 • private The organization submits its annual CSBG Information Survey data report and it reflects client demographics and organization- wide outcomes.

ORGANIZATIONAL STANDARDS FOR PUBLIC CSBG ELIGIBLE ENTITIES

MAXIMUM FEASIBLE PARTICIPATION

Category one: Consumer Input and Involvement

Community Action is rooted in the belief that people with low incomes are in the best position to express what they need to make a difference in their lives. CSBG eligible entities work in partnership with the people and communities they serve. Community Action works in a coordinated and comprehensive manner to develop programs and services that will make a critical difference in the lives of participants. Individuals and families are well attuned to what they need, and when Community Action taps into that knowledge, it informs our ability to implement high impact programs and services.

Research shows that through engagement in community activities such as board governance, peer to peer leadership, advisory bodies, volunteering, and other participatory means, the poor build personal networks and increase their social capital so that they are able to move themselves and their families out of poverty. Community Action is grounded in helping families and communities build this social capital for movement to self-sufficiency.

Standard 1.1 • public The department demonstrates low-income individuals' participation in its activities.

Standard 1.2 • public The department analyzes information collected directly from low-income individuals as part of the community assessment.

Standard 1.3 • public The department has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the tripartite board/advisory body, which may be met through broader local government processes.

Category two: Community Engagement

No CSBG eligible entity can meet all of a community's needs independently. Through formal and informal partnerships, ongoing community planning, advocacy, and engagement of people with low incomes, partners ranging from community and faith-based organizations, educational institutions, government, and business can work together with Community Action agencies and other CSBG eligible entities to successfully move families out of poverty and revitalize communities.

Community Action is often the backbone organization of community efforts to address poverty and community revitalization: leveraging funds, convening key partners, adding the voice of the underrepresented, and being the central coordinator of efforts. It is not an easy role to play, but a vital one for families and communities.

Standard 2.1 • public The department has documented or demonstrated partnerships across the community, for specifically identified purposes; partnerships include other anti-poverty organizations in the area.

Standard 2.2 • public The department utilizes information gathered from key sectors of the community in assessing needs and resources, during the community assessment process or other times. These sectors would include at minimum: community-based organizations, faith- based organizations, private sector, public sector, and educational institutions.

Standard 2.3 • public The department communicates its activities and its results to the community.

Standard 2.4 • public The department documents the number of volunteers and hours mobilized in support of its activities.

Category three: Community Assessment

Local control of Federal CSBG resources is predicated on regular comprehensive community assessments that take into account the breadth of community needs as well as the partners and resources available in a community to meet these needs. Regular assessment of needs and resources at the community level is the foundation of Community Action and a vital management and leadership tool that is used across the organization and utilized by the community to set the course for both CSBG and all agency resources.

Standard 3.1 • public The department conducted or was engaged in a community assessment and issued a report within the past 3 years, if no other report exists.

Standard 3.2 • public As part of the community assessment, the department collects and includes current data specific to poverty and its prevalence related to gender, age, and race/ethnicity for their service area(s).

Standard 3.3 • public The department collects and analyzes both qualitative and quantitative data on its geographic service area(s) in the community assessment.

Standard 3.4 • public The community assessment includes key findings on the causes and conditions of poverty and the needs of the communities assessed.

Standard 3.5 • public The tripartite board/advisory body formally accepts the completed community assessment.

VISION AND DIRECTION

Category four: Organizational Leadership

Community Action leadership is exemplified at all levels across the organization and starts with a mission that clarifies Community Action's work on poverty. A well-functioning board, a focused department head, well-trained and dedicated staff, and volunteers giving of themselves to help others will establish Community Action as the cornerstone and leverage point to address poverty across the community. Ensuring strong leadership both for today and into the future is critical.

This category addresses the foundational elements of mission as well as the implementation of the Network's model of good performance management (ROMA). It ensures CAAs have taken steps to plan thoughtfully for today's work and tomorrow's leadership.

Standard 4.1 • public The tripartite board/advisory body has reviewed the department's mission statement within the past 5 years and assured that:

1. The mission addresses poverty; and
2. The CSBG programs and services are in alignment with the mission.

Standard 4.2 • public The department's Community Action plan is outcome-based, anti-poverty focused, and ties directly to the community assessment.

Standard 4.3 • public The department's Community Action plan and strategic plan document the continuous use of the full Results Oriented Management and Accountability (ROMA) cycle or comparable system (assessment, planning, implementation, achievement of results, and evaluation). In addition, the department documents having used the services of a ROMA-certified trainer (or equivalent) to assist in implementation.

Standard 4.4 • public The tripartite board/advisory body receives an annual update on the success of specific strategies included in the Community Action plan.

Standard 4.5 • public The department adheres to its local government's policies and procedures around interim appointments and processes for filling a permanent vacancy.

Standard 4.6 • public The department complies with its local government's risk assessment policies and procedures.

Category five: Board Governance

Community Action boards are uniquely structured to ensure maximum feasible participation by the entire community, including those the Network serves. By law, Community Action boards are comprised of at least 1/3 low-income consumers (or their representatives), 1/3 elected officials (or their appointees), and the remainder private-sector community members. To make this structure work as intended, CAAs must recruit board members thoughtfully, work within communities to promote opportunities for board service, and orient, train, and support them in their oversight role. Boards are foundational to good organizational performance and the time invested to keep them healthy and active is significant, but necessary.

Standard 5.1 • public

The department's tripartite board/advisory body is structured in compliance with the CSBG Act, by either:

1. Selecting the board members as follows:
   - At least one third are democratically-selected representatives of the low-income community;
   - One-third are local elected officials (or their representatives); and
   - The remaining members are from major groups and interests in the community; or
2. Selecting the board through 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.

Standard 5.2 • public

The department's tripartite board/advisory body either has:

1. Written procedures that document a democratic selection process for low-income board members adequate to assure that they are representative of the low-income community, or
2. 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.

Please note under IM 82 for Public Entities the law also requires that a minimum of 1/3 of tripartite board membership be comprised of representatives of low-income individuals and families who reside in areas served.

Standard 5.3 • public

Not applicable: Review of bylaws by an attorney is outside of the purview of the department and the tripartite board/advisory body, therefore this standard does not apply to public entities.

Standard 5.4 • public

The department documents that each tripartite board/advisory body member has received a copy of the governing documents, within the past 2 years.

Standard 5.5 • public	The department's tripartite board/advisory body meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its governing documents.
Standard 5.6 • public	Each tripartite board/advisory body member has signed a conflict of interest policy, or comparable local government document, within the past 2 years.
Standard 5.7 • public	The department has a process to provide a structured orientation for tripartite board/advisory body members within 6 months of being seated.
Standard 5.8 • public	Tripartite board/advisory body members have been provided with training on their duties and responsibilities within the past 2 years.
Standard 5.9 • public	The department's tripartite board/advisory body receives programmatic reports at each regular board/advisory meeting.

Category six: Strategic Planning

Establishing the vision for a Community Action agency is a big task and setting the course to reach it through strategic planning is serious business. CSBG eligible entities take on this task by looking both at internal functioning and at the community's needs. An efficient organization knows where it is headed, how the board and staff fit into that future, and how it will measure its success in achieving what it has set out to do. This agency-wide process is board-led and ongoing. A "living, breathing" strategic plan with measurable outcomes is the goal, rather than a plan that gets written but sits on a shelf and stagnates. Often set with an ambitious vision, strategic plans set the tone for the staff and board and are a key leadership and management tool for the organization.

Standard 6.1 • public The department has a strategic plan, or comparable planning document, in place that has been reviewed and accepted by the tripartite board/advisory body within the past 5 years. If the department does not have a plan, the tripartite board/advisory body will develop the plan.

Standard 6.2 • public The approved strategic plan, or comparable planning document, addresses reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient.

Standard 6.3 • public The approved strategic plan, or comparable planning document, contains family, agency, and/or community goals.

Standard 6.4 • public Customer satisfaction data and customer input, collected as part of the community assessment, is included in the strategic planning process, or comparable planning process.

Standard 6.5 • public The tripartite board/advisory body has received an update(s) on progress meeting the goals of the strategic plan/comparable planning document within the past 12 months.

OPERATIONS AND ACCOUNTABILITY

Category seven: Human Resource Management

The human element of Community Action's work is evident at all levels of the organization and the relationship an organization has with its staff often reflects the organization's values and mission. Oversight of the department head and maintaining a strong human resources infrastructure are key responsibilities of board oversight. Attention to organizational elements such as policies and procedures, performance appraisals, and training lead to strong organizations with the capacity to deliver high-quality services in low-income communities.

Standard 7.1 • public Not applicable: Local governmental personnel policies are outside of the purview of the department and the tripartite board/advisory body, therefore this standard does not apply to public entities.

Standard 7.2 • public The department follows local governmental policies in making available the employee handbook (or personnel policies in cases without a handbook) to all staff and in notifying staff of any changes.

Standard 7.3 • public The department has written job descriptions for all positions. Updates may be outside of the purview of the department.

Standard 7.4 • public The department follows local government procedures for performance appraisal of the department head.

Standard 7.5 • public The compensation of the department head is made available according to local government procedure.

Standard 7.6 • public The department follows local governmental policies for regular written evaluation of employees by their supervisors.

Standard 7.7 • public The department provides a copy of any existing local government whistleblower policy to members of the tripartite board/advisory body at the time of orientation.

Standard 7.8 • public The department follows local governmental policies for new employee orientation.

Standard 7.9 • public The department conducts or makes available staff development/training (including ROMA training) on an ongoing basis.

Category eight: Financial Operations and Oversight

The fiscal bottom line of Community Action is not isolated from the mission; it is a joint consideration. Community Action boards and staff maintain a high level of fiscal accountability through audits, monitoring by State and Federal agencies, and compliance with Federal Office of Management Budget circulars. The management of Federal funds is taken seriously by CSBG eligible entities and the Standards specifically reflect the board's oversight role as well as the day-to-day operational functions.

Standard 8.1 • public The department's annual audit is completed through the local governmental process in accordance with Title 2 of the Code of Federal Regulations, Uniform Administrative Requirements, Cost Principles, and Audit Requirement (if applicable) and/or State audit threshold requirements. This may be included in the municipal entity's full audit.

Standard 8.2 • public The department follows local government procedures in addressing any audit findings related to CSBG funding.

Standard 8.3 • public The department's tripartite board/advisory body is notified of the availability of the local government audit.

Standard 8.4 • public The department's tripartite board/advisory body is notified of any findings related to CSBG funding.

Standard 8.5 • public Not applicable: The audit bid process is outside of the purview of tripartite board/advisory body therefore this standard does not apply to public entities.

Standard 8.6 • public Not applicable: The Federal tax reporting process for local governments is outside of the purview of tripartite board/advisory body therefore this standard does not apply to public entities.

Standard 8.7 • public The tripartite board/advisory body receives financial reports at each regular meeting, for those program(s) the body advises, as allowed by local government procedure.

Standard 8.8 • public Not applicable: The payroll withholding process for local governments is outside of the purview of the department, therefore this standard does not apply to public entities.

Standard 8.9 • public The tripartite board/advisory body has input as allowed by local governmental procedure into the CSBG budget process.

Standard 8.10 • public Not applicable: The fiscal policies for local governments are outside of the purview of the department and the tripartite board/advisory body, therefore this standard does not apply to public entities.

Standard 8.11 • public Not applicable: Local governmental procurement policies are outside of the purview of the department and the tripartite board/advisory body, therefore this standard does not apply to public entities.

Standard 8.12 • public Not applicable: A written cost allocation plan is outside of the purview of the department and the tripartite board/advisory body, therefore this standard does not apply to public entities.

Standard 8.13 • public The department follows local governmental policies for document retention and destruction.

Category nine: Data and Analysis

The Community Action Network moves families out of poverty every day across this country and needs to produce data that reflect the collective impact of these efforts. Individual stories are compelling when combined with quantitative data: *no data without stories and no stories without data*. Community Action needs to better document the outcomes families, agencies, and communities achieve. The Community Services Block Grant funding confers the obligation and opportunity to tell the story of agency-wide impact and community change, and in turn the impact of the Network as a whole.

Standard 9.1 • public The department has a system or systems in place to track and report client demographics and services customers receive.

Standard 9.2 • public The department has a system or systems in place to track family, agency, and/or community outcomes.

Standard 9.3 • public The department has presented to the tripartite board/advisory body for review or action, at least within the past 12 months, an analysis of the agency's outcomes and any operational or strategic program adjustments and improvements identified as necessary.

Standard 9.4 • public The department submits its annual CSBG Information Survey data report and it reflects client demographics and CSBG-funded outcomes.

Appendix 4: State Implementation of Organizational Standards – Key Considerations

Critical Action Area	Description	Critical Partners and Available
Initial discussions with key partners in the State	*State convenes discussions with eligible entities, State CAA Association, and other partners to discuss process and timeline for adopting COE-developed organizational standards.*	State CSBG Lead Agency, eligible entities, State CAA Association
Assessment of State laws and rulemaking requirements	*State CSBG officials, legal counsel, and contracting officials review existing State laws, regulations, and contracting procedures for necessary actions or venues for communication of standards (e.g. State register).*	State procurement office, State agency counsel, National Association for State Community Services Programs (NASCSP), Community Action Program Legal Services, Inc.
Development and public notification of State standards	*After review of current rules, standards and requirements, State CSBG officials identify and communicate anticipated organizational standards for CSBG eligible entities. Standards are communicated in writing through State register notice, website publication, or other public notice consistent with State procedures and rulemaking requirements.*	CSBG Organizational Standards Center of Excellence
Opportunities for input on timelines and procedures	*Through public meetings, consultations, hearings, and written input processes, States provide opportunities for input from CSBG eligible entities and other stakeholders on the timelines and procedures for implementation of organizational standards, including processes for incorporating into State monitoring procedures and organizational bylaws, as appropriate.*	CSBG Regional Performance and Innovation Consortia (RPIC), State CAA Association
Development and communication of technical assistance strategies	*In partnership with State and national technical assistance partners, the State establishes and communicates a technical assistance strategy to help assure that all CSBG eligible entities have access to technical assistance to meet required standards. Assistance in agency self-assessment may be provided. Technical assistance may be funded through State discretionary resources, may be sponsored federally, or may be paid for by affected organizations, as appropriate.*	CSBG Organizational Standards Center of Excellence, CSBG Learning Communities Resource Center, CSBG Risk Mitigation Training and Technical Assistance Center, CSBG RPIC, State CSBG Associations, Office of Community Services (OCS) State Liaison staff
Incorporation of standards in State CSBG Plan	*State CSBG officials incorporate organizational standards and procedures for implementation into annual State CSBG Plans. These plans are made*	NASCSP, CSBG Organizational Standards Center of Excellence, OCS State Liaison staff

Critical Action Area	Description	Critical Partners and Available Resources
	public inspection consistent with requirements in the CSBG Act and are submitted for Federal review as part of the application for CSBG funds.	
Incorporation of standards in local CSBG Plans and agency procedures	*Eligible entity boards and leadership incorporate organizational standards into agency procedures and practices, as appropriate, to assure compliance with all standards and procedures. Compliance with organizational standards is incorporated into board oversight and executive performance plans as appropriate.*	CSBG Organizational Standards of Excellence, Community Action Program Legal Services, Inc., State CAA Associations
Assessment and communication of results	*State organizational standards are incorporated into State oversight procedures. As required under the CSBG Act, a full onsite review is conducted at least once every three years and ad hoc monitoring is conducted as necessary. When State identifies non-compliance through State monitoring, it clearly communicates specific deficiencies and requirements for corrective action and offers technical assistance as appropriate.*	NASCSP, CSBG Organizational Standards Center of Excellence, OCS State Liaison staff
Corrective action cycle	*As necessary, States may initiate further procedures or funding actions consistent with the CSBG Act. In situations in which an eligible entity does not correct significant deficiencies within required deadlines, or in which widespread or systemic issues are identified that cannot feasibly be corrected in a reasonable timeframe, a State may initiate action to terminate eligible entity status consistent with the CSBG Act. Conversely, agencies that are identified as having best practices related to State standards may be identified as exemplars and assist in quality improvement efforts as appropriate.*	CSBG Learning Communities Resource Center, CSBG Risk Mitigation Training and Technical Assistance Center, State CSBG Associations, OCS State Liaison staff Note: For detailed guidance on CSBG requirements, see IM 116.

APPENDIX P

STATE PLAN DISTRIBUTION LIST

USDHHS/ACF/OCS—Original and one copy

State Human Service Agencies—Letter of Notification:
- SCDHHS
- SCDSS
- SCDDSN
- SCDMH

County Administrators (Letter of Notification)

Community Action Agencies (Draft copies)
- Board Chairperson
- CAA Executive Director
- SC Community Action Partnership (State Association) Director
- CSBG Program Director
- CAA Fiscal Officer

Governor's Office
OEO Staff—Draft copy

State Library (3 Final copies)