

Community Services Block Grant

**COMMUNITY SERVICES
BLOCK GRANT (CSBG)
Fiscal Year 2015 Only**

VERMONT HUMAN SERVICES PLAN - FY 2015
FEDERAL ASSURANCES & DOCUMENTATION Page B-2

Community Services Block Grant

STATEMENT OF FEDERAL AND CSBG ASSURANCES

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

A. PROGRAMMATIC ASSURANCES

- (1) Funds made available through the grant or allotment will be used:
 - (a) To support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals to:
 - (i) remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
 - (ii) secure and retain meaningful employment;
 - (iii) attain an adequate education, with particular attention toward improving literacy skills of the low-income families in the communities involved, which may include carrying out family literacy initiatives;
 - (iv) make better use of available income;
 - (v) obtain and maintain adequate housing and a suitable living environment;
 - (vi) obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs; and
 - (vii) achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and to strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;
 - (b) To address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and after-school child care programs; and

Community Services Block Grant

- (c) To make more effective use of, and to coordinate with, other programs related to the purposes of this subtitle (including State welfare reform efforts). [‘676(b)(1)]
- (2) To describe how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in section 675C(b) of the Act in accordance with this subtitle, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of the community services block grant program; [‘676(b)(2)]
- (3) To provide information provided by eligible entities in the State, including:
 - (a) a description of the service delivery system, for services provided or coordinated with funds made available through grants made under section 675C(a) of the Act, targeted to low-income individuals and families in communities within the State;
 - (b) a description of how linkages will be developed to fill identified gaps in the services, through the provision of information, referrals, case management, and follow up consultations;
 - (c) a description of how funds made available through grants made under section 675C(a) will be coordinated with other public and private resources; and
 - (d) a description of how the local entity will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting. [‘676(b)(5)]
- (4) To ensure that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals. [‘676(b)(4)]
- (5) That the State and the eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services, and a description of how the State and the eligible entities will coordinate the provision of employment and training activities in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998; [‘676(b)(5)]
- (6) To ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such communities. [‘676(b)(6)]
- (7) To permit and cooperate with Federal investigations undertaken in accordance with section 678D of the Act. [‘676(b)(7)]
- (8) That any eligible entity in the State that received funding in the previous fiscal year through a community services block grant made under this subtitle will not have its funding terminated

Community Services Block Grant

- under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b) of the Act. ['676(b)(8)]
- (9) That the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations. ['676(b)(9)]
 - (10) To require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation. ['676(b)(11)]
 - (11) To secure from each eligible entity in the State, as a condition to receipt of funding, a community action plan (*which shall be submitted to the Secretary, at the request of the Secretary, with the State plan*) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs; ['676(b)(11)]
 - (12) That the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to section 678E(b) of the Act. ['676(b)(12)]
 - (13) To provide information describing how the State will carry out the assurances. ['676(b)(13)]

B. ADMINISTRATIVE AND FINANCIAL ASSURANCES

The State further agrees to the following, as required under the Act:

- (1) To submit an application to the Secretary containing information and provisions that describe the programs for which assistance is sought under the community services block grant program prepared in accordance with and containing the information described in Section 676 of the Act. ['675A(b)]
- (2) To use not less than 90 percent of the funds made available to the State by the Secretary under Section 675A or 675B of the act to make grants to eligible entities for the stated purposes of the community services block grant program and to make such funds available to eligible entities for obligation during the fiscal year and the succeeding fiscal year, subject to the provisions regarding recapture and redistribution of un-obligated funds outlined below. ['675C(a)(1) and (2)]
- (3) In the event that the State elects to recapture and redistribute funds to an eligible entity through a grant made under Section 675C(a)(1) when un-obligated funds exceed 20 percent of the amount so distributed to such eligible entity for such fiscal year, the State agrees to

Community Services Block Grant

- redistribute recaptured funds to an eligible entity, or require the original recipient of the funds to redistribute the funds to a private, nonprofit organization, located within the community served by the original recipient of the funds, for activities consistent with the purposes of the community services block grant program. ['675C(a)(3)]
- (4) To spend no more than the greater of \$55,000 or 5 percent of its grant received under Section 675A or the State allotment received under section 675B for administrative expenses, including monitoring activities. ['675C(b)(2)]
 - (5) In states with a charity tax credit in effect under state law, the State agrees to comply with the requirements and limitations specified in Section 675(c) regarding use of funds for statewide activities to provide charity tax credits to qualified charities whose predominant activity is the provision of direct services within the United States to individuals and families whose annual incomes generally do not exceed 185 percent of the poverty line in order to prevent or alleviate poverty among such individuals and families. ['675(c)]
 - (6) That the lead agency will hold at least one hearing in the state with sufficient time and statewide distribution of notice of such hearing, to provide to the public an opportunity to comment on the proposed use and distribution of funds to be provided through the grant or allotment under Section 675A or '675B for the period covered by the state plan. ['676(a)(2)(B)]
 - (7) That the chief executive officer of the State will designate an appropriate State agency for purposes of carrying out State community services block grant program activities. ['676(a)(1)]
 - (8) To hold at least one legislative hearing every three years in conjunction with the development of the State plan. ['676(a)(3)]
 - (9) To make available for the public inspection each plan or revised State plan in such a manner as will facilitate review of and comment on the plan. ['676(e)(2)]
 - (10) To conduct the following reviews of eligible entities:
 - (a) full onsite review of each such entity at least once during each three year period;
 - (b) an onsite review of each newly designated entity immediately after the completion of the first year in which such entity receives funds through the community services block grant program;
 - (c) follow-up reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards, and requirements established by the State;
 - (d) other reviews as appropriate, including reviews of entities with programs that have had other Federal, State or local grants (other than assistance provided under the community services block grant program) terminated for cause. ['678B(a)]
 - (11) In the event that the State determines that an eligible entity fails to comply with the terms of an agreement or the State plan, to provide services under the community services block grant program or to meet appropriate standards, goals, and other requirements established by the State including performance objectives), the State will comply with the requirements outlined in Section 678C of the Act, to:

Community Services Block Grant

- (a) inform the entity of the deficiency to be corrected;
 - (b) require the entity to correct the deficiency;
 - (c) offer training and technical assistance as appropriate to help correct the deficiency, and submit to the Secretary a report describing the training and technical assistance offered or stating the reasons for determining that training and technical assistance are not appropriate;
 - (d) at the discretion of the State, offer the eligible entity an opportunity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan and to either approve the proposed plan or specify reasons why the proposed plan cannot be approved.
 - (e) after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding to the eligible entity unless the entity corrects the deficiency. ['678(C)(a)]
- (12) To establish fiscal controls, procedures, audits and inspections, as required under Sections 678D(a)(1) and 678D(a)(2) of the Act.
 - (13) To repay to the United States amounts found not to have been expended in accordance with the Act, or the Secretary may offset such amounts against any other amount to which the State is or may become entitled under the community services block grant program. ['678D(a)(3)]
 - (14) To participate, and ensure that all-eligible entities in the State participate, in the Results-Oriented Management and Accountability (ROMA) System. ['678E(a)(1)]
 - (15) To prepare and submit to the Secretary an annual report on the measured performance of the State and its eligible entities, as described under '678E(a)(2) of the Act.
 - (16) To comply with the prohibition against use of community services block grant funds for the purchase or improvement of land, or the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility, as described in section 678F(a) of the Act.
 - (17) To ensure that programs assisted by community services block grant funds shall not be carried out in a manner involving the use of program funds, the provision of services, or the employment or assignment of personnel in a manner supporting or resulting in the identification of such programs with any partisan or nonpartisan political activity or any political activity associated with a candidate, or contending faction or group, in an election for public or party office; any activity to provide voters or prospective voters with transportation to the polls or similar assistance with any such election, or any voter registration activity. ['678F(b)]
 - (18) To ensure that no person shall, on the basis of race, color, national origin or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part with community services block grant program funds. Any prohibition against discrimination on the basis of age under the Age Discrimination

Community Services Block Grant

Act of 1975 (42 U.S.C. 6101 et seq.) or with respect to an otherwise qualified individual with a disability as provided in section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 12131 et seq.) shall also apply to any such program or activity. ['678F(c)]

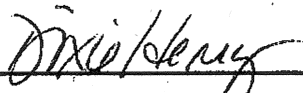
- (19) To consider religious organizations on the same basis as other non-governmental organizations to provide assistance under the program so long as the program is implemented in a manner consistent with the Establishment Clause of the first amendment to the Constitution; not to discriminate against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

C. OTHER ADMINISTRATIVE CERTIFICATIONS

The State also certifies the following:

- (1) To provide assurances that cost and accounting standards of the Office of Management and Budget (OMB Circular A-110 and A-122) shall apply to a recipient of community services block grant program funds.
- (2) To comply with the requirements of Public Law 103-227, Part C Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994, which requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 if the services are funded by a Federal grant, contract, loan or loan guarantee. The State further agrees that it will require the language of this certification be included in any sub-awards, which contain provisions for children's services and that all sub-grantees shall certify accordingly.

Signature



Deputy Secretary, Agency of Human Services



Date

Community Services Block Grant

NARRATIVE STATE PLAN

I. INTRODUCTION

In 1981, the Governor of Vermont designated the Office of Economic Opportunity, administrator of the Community Services Block grant (hereinafter called CSBG). Under the provisions of the Omnibus Budget Reconciliation Act of 1981 (hereinafter called OMBR), and Public Law 98-558, Human Services Reauthorization Act of 1984, and the Augustus F. Hawkins Human Services Reauthorization of 1990 (P.L. 101-501), and the COATS Human Services Reauthorization Act of 1998, the Office of Economic Opportunity has developed a proposed plan for the distribution and use of these funds.

The CSBG program will be used to provide a range of services and activities having a measurable and potentially major impact on the causes and effects of poverty in Vermont. The activities will be directed toward assisting low-income participants including the elderly poor. A common theme among the local programs is the active participation of low-income people, in tandem with public officials and leaders of the private sector, in the design and implementation of the programs. In addition, these programs share a common goal: the achievement of self-sufficiency, emphasizing self-reliance and institutional change to assist the low-income people they serve. This State Plan is prepared and submitted to comply with the legislative requirements which specify, in order to receive an allotment under this subtitle, an application shall be submitted to the Secretary of the Department of Health and Human Services (hereinafter called HHS). The plan will be submitted to the State legislature for the purpose of conducting public hearings on the proposed use and distribution of the funds.

This plan sets forth the State's policy, goals and objectives for the program, the requirements which subgrantees must meet to qualify for funds, the manner in which the State intends to distribute the block grant and the procedures the State intends to implement in administering the program.

II. GOALS AND OBJECTIVES OF THE PROGRAM

The mission of the Agency of Human Services is to improve the health and well-being of Vermonters today and tomorrow and to protect those among us who are unable to protect themselves. The Department for Children and Families, as part of an integrated Agency of Human Services, fosters the healthy development, safety, well-being, and self-sufficiency of Vermonters. The Office of Economic Opportunity is a division of the Department for Children and Families. The mission of the Vermont Office of Economic Opportunity, which administers the Community Services Block Grant, is to increase the self-sufficiency of Vermonters, strengthen Vermont communities, and eliminate the causes and symptoms of poverty. The mission coincides with and fosters the intent of the goals and objectives of the CSBG program.

In its utilization of CSBG funds, the State of Vermont seeks to further the following goals:

1. to provide a range of services and activities having a measurable and potentially major impact on causes and effects of poverty in the community or those areas of the community where poverty is a particularly acute problem;
2. to provide activities designed to assist low-income participants including the elderly poor;
 - a. to secure and retain meaningful employment;

Community Services Block Grant

- b. to attain an adequate education;
 - c. to make better use of available income;
 - d. to obtain and maintain adequate housing and a suitable living environment;
 - e. to obtain emergency assistance through loans or grants to meet immediate and urgent individual and family needs including the need for health services, nutritious food, housing and employment-related assistance;
 - f. to remove obstacles and solve problems which block the achievement of self-sufficiency;
 - g. to achieve greater participation in the affairs of the community; and
 - h. to make more effective use of other programs related to this subtitle;
- 3. to provide on an emergency basis for the provision of such supplies and services, nutritious foodstuffs and related services, as may be necessary to counteract conditions of starvation and malnutrition among the poor;
 - 4. to coordinate and establish linkages between governmental and other social services programs to assure the effective delivery of such services to low-income individuals;
 - 5. to encourage the use of entities in the private sector of the community in efforts to ameliorate poverty in the community; and
 - 6. to provide for coordination between anti-poverty programs in each community, where appropriate, with emergency energy crisis programs under Title XXVI of this Act (relating to Low Income Home Energy Assistance) conducted in such community.

III. DISTRIBUTION OF FUNDS

Vermont CSBG (a) funds will be distributed to five eligible Community Action Agencies, which provide services in all fourteen counties in Vermont. These entities, in accordance with their statutory designation, are considered by the State of Vermont to be the lead anti-poverty organization for each of their respective services areas.

Eligible Entities:

Geographic Areas Served:

BROC – Community Action in Southwestern Vermont

Rutland, Bennington Counties (except Pittsfield Town)

Capstone Community Action
(formerly Central Vermont Community Action Council)

Lamoille, Orange, Washington Counties, and Pittsfield, Granville, Hancock, Rochester, Bethel, Stockbridge, Royalton, Sharon and Barnard Towns

Champlain Valley Office of Economic Opportunity

Chittenden, Franklin, Grand Isle Counties, and in Addison County (except Hancock and Granville Towns)

Northeast Kingdom Community Action

Caledonia, Essex, Orleans Counties

Community Services Block Grant

Southeastern Vermont Community Action

Windham and Windsor Counties (except
Rochester, Bethel, Stockbridge, Royalton,
Sharon and Barnard Towns)

The amount to be awarded to each Community Action Agency will be determined by the application of the State Office of Economic Opportunity allocation formula. This formula is designed to insure that each eligible entity receives an amount sufficient to provide an administrative funding base and, further, to ensure that funding to specific areas during subsequent years corresponds to the current economic situation of each area.

Prior to the award of CSBG funds, the Office of Economic Opportunity will reserve 10 percent of the funds awarded. Fifty-five thousand dollars (\$55,000) or 5 percent, whichever is larger, will be used for State administration of the program. With the balance of the funds reserved, the State may:

1. transfer in accordance with Section 675(c)(5) of the CSBG Act; or
2. utilize for the purpose of funding special projects which have proven to be, or may prove to be particularly effective in ameliorating the causes of poverty in communities within the State; or
3. distribute through the allocation formula.

By statute, Vermont shall distribute 90% of its total CSBG award to eligible entities. The Office of Economic Opportunity allocation formula is updated periodically to address the distribution of this statutory 90% to Vermont's five Community Action Agencies while allowing for adjustments to be made as current, local poverty data become available.

The State Office of Economic Opportunity has adopted the FY 2010 Community Action Agencies distributions as the new base levels for funding.

In any year where Vermont receives an increase in core CSBG funding available to eligible entities—above the FY 2010 base level of \$3,357,000—the additional core funds—in excess of that historical base—shall be distributed on the basis of each eligible entity's service territory's share of the State's total eligible population (currently defined as the number of persons at or below 125% of the federal poverty level).

In any year where Vermont receives a decrease in core CSBG funding below the FY 2010 core funding level of \$3,357,000, a corresponding across-the-board percentage reduction will be applied to the base awards of all eligible entities.

FFY 2015 Distribution of Funds: Based on the assumption of level funding from FFY 2014, *i.e.* **\$3,517,270 for FY 2015 CSBG**, the planned distribution of funds is:

BROC – Community Action in Southwestern Vermont	\$563,832
Capstone Community Action (formerly Central Vt Community Action Council)	\$602,501
Champlain Valley Office of Economic Opportunity	\$927,019
Northeast Kingdom Community Action	\$580,437
Southeastern Vermont Community Action	\$491,752

Community Services Block Grant

HISTORICAL NOTE

FY 2010 base awards were arrived at by distributing the historical FFY 1993 base of \$2,051,460 according to the following formula:

- 50% divided equally
- 40% on the basis of eligible population
- 5% on the basis of per capita income
- 5% excess unemployment

and the excess of \$1,305,540 on the basis of each eligible entity's service territory's share of the State's total eligible population (defined as the number of persons at or below 125% of federal poverty level).

IV. QUALIFICATIONS AND APPLICATION OF FUNDS

For Fiscal Year 2015, all agencies identified as eligible to apply for funds shall submit an application before the beginning of the grant year in a form prescribed by the State Office of Economic Opportunity in the "Request for Work Plan." Applications must be approved by the eligible entity's governing board and signed by the chief governing official of the board.

1. Determination of Community Needs and Strengths

Each eligible sub-grantee governing board is responsible for conducting an assessment of low-income community needs and strengths, establishing service priorities, developing goals and objectives to address the needs identified and prioritized, and build on identified strengths. The State Office of Economic Opportunity recognizes the value of long-term, in-depth planning for the purpose of ensuring the most effective utilization of Federal funds. As Federal funding resources grow scarcer, the value of an efficient planning process becomes progressively greater.

All eligible entities will be required to submit, as an integral part of their application, a description of the community assessment process within the service area. Further, the State Office of Economic Opportunity perceives the community assessment to be an ongoing process - needs and strengths are constantly being reassessed through the experience of the sub-grantees and the acquisition of new information. A formal assessment serves as a base from which to judge the changing needs of the community.

The community assessment report should show not only the problems that can be ameliorated by delivery of services, but problems that pinpoint precisely the major causes of poverty in that area; for example, the absence of an industrial base, seasonal employment, a high percentage of families on minimum wage income, etc. The community assessment report should also identify community strengths, including unique community assets and resources which support specific approaches and partnerships. While the State Office of Economic Opportunity does not expect that each sub-grantee will be able to address all problems that are identified in the community assessment, the State

Community Services Block Grant

expects that the detailed identification of those problems and community strengths will ensure: the appropriate targeting of resources; enable sub-grantees to design specific plans to address problems which build on community strengths; and ensure that the highest return possible is realized through the expenditure of federal funds. The State Office of Economic Opportunity requires an updated community assessment for each new program year.

2. Request for Work Plan

The State Office of Economic Opportunity has developed a Request for Work Plan package for distribution to all eligible entities currently operating programs under the CSBG Act. The Request for Work Plan outlines broad goals and the general activities allowed under the Act, and requires detailed sub-grantee responses delineating specific activities to be undertaken by the sub-grantees in their efforts to achieve the purposes of the Act. The Request for Work Plan will provide estimates of sub-grantee awards, and contains the following major components, outlined below:

Program Design

- a. Mission
- b. Community Assessment

ROMA Implementation Plan

- a. Indicators
- b. Targets
- c. Programs reporting

Management and Administration

- a. Board structure and composition
- b. Sub-grantee's organizational structure
- c. Job descriptions of employees funded with CSBG
- d. Operating procedure by which the sub-grantee identifies eligible clients
- e. Evaluation and control systems

Budget/Financial Management

- a. Line Item Budget
- b. Financial Management Plan

Assurances

Signed assurances relative to activities undertaken and expenditures incurred with CSBG

(The complete Request for Work Plan is included within this State Plan document.)

Community Services Block Grant

3. Uses of the Request for Work Plan

a. U.S. Department of Health & Human Services - Annual Plan

Responses to the Request for Work Plan will be utilized in the preparation of the State's annual plan and application for funds under the CSBG program.

b. Vermont Office of Economic Opportunity - Grants for the Provisions of Services

Responses to the Request for Work Plan will be evaluated for technical quality, cost reasonableness and cost effectiveness, as well as for the potential of proposed activities to ameliorate the causes and effects of poverty. Only those proposals which meet all the requirements of the Request for Work Plan will be considered.

Once acceptable proposals have been evaluated, representatives of the prospective sub-grantees will be invited to negotiate a grant agreement based on the proposal submitted. The purpose of the negotiations is to arrive at a mutually-agreeable and cost-effective approach to meeting the requirements of the Request for Work Plan and the goals of the program.

Once agreement has been reached in regards to program approach and line item budgets, the State Office of Economic Opportunity will award grants.

V. STATE MONITORING OF PROGRAM

Consistent with the federal requirements in section 678B of the CSBG statute, The State of Vermont conducts monitoring of all CSBG Eligible Entities to determine whether eligible entities are meeting the performance goals, administrative standards, financial management requirements, and other requirements of the State.

Onsite Monitoring: The State Office of Economic Opportunity and The Agency of Human Services Audit Unit conducts the following reviews of all eligible entities:

- A full onsite review of each eligible entity at least once during each 3-year period. This onsite monitoring incorporates interviews with the Community Action Agency management, staff and board, review of back-up documentation, site inspection, review of client files, policies and procedures. The process utilizes the State of Vermont's CSBG Monitoring tool which contains 130 items dealing with Program Compliance, Board Governance, ROMA implementation and data quality, and Administrative Operations. The Agency of Human Services Audit Unit uses its financial monitoring tool which focuses on Fiscal Controls and Financial Procedures. The dates of the last completed full CSBG audits are:
 - BROC – Community Action in Southwestern Vermont, June 27th and July 26th, 2013
 - Central Vermont Community Action Council (now Capstone Community Action), July 18th and August 7th, 2013
 - Champlain Valley Office of Economic Opportunity, June 20th and July 9th, 2013
 - Northeast Kingdom Community Action, June 25th and August 3rd, 2013
 - Southeastern Vermont Community Action, July 29th, 2013

Community Services Block Grant

- An onsite review of each newly designated entity immediately after the completion of the first year in which the entity receives funds through the community services block grant program.
- Follow-up reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards, and requirements established by the State. The State Office of Economic Opportunity uses a risk-assessment procedure to determine if follow-up monitoring is indicated, and whether the next full monitoring visit is required in one, two or three years.
- Other reviews as appropriate, including reviews of entities with programs that have had other Federal, State, or local grants terminated for cause.

Additionally, the State Office of Economic Opportunity conducts off-site (desk monitoring) reviews of all eligible entities throughout the program year. This consists primarily of a review of financial and programmatic reports from eligible entities.

I. Reporting Requirements

a. Programmatic

- 1) Each Vermont Community Action Agency, in conjunction with the State Office of Economic Opportunity, has developed a client information system to collect and track data on programs operated, clients served, and outcomes achieved. Community Action Agencies will use the information systems to generate a demographic profile of clients served and the types of services provided. Summary reports on the number of, and characteristics of, clients served will be submitted to the State Office of Economic Opportunity on a quarterly basis, defined in the individual grant agreements with the local sub-grantees.
- 2) Programmatic reports, consisting of the agency's National Performance Indicator data, detailing the progress the Community Action Agency has made towards each of the Six National Goals, and a CSBG narrative in the format proscribed by the National Association for State Community Service Programs (NASCS), will be submitted by each Community Action Agency to the State Office of Economic Opportunity quarterly.

b. Financial

- 1) The State Office of Economic Opportunity has developed a financial report – Invoice/Financial Statement – which is designed to facilitate the reporting of financial data on a monthly and cumulative basis. This report form was designed to afford the State and the sub-grantees the capability to carefully monitor expenditures by comparing actual to projected expenditures as presented on the Monthly Expenditure Plan.

2. Utilization of Required Reports

Report forms have been designed to consolidate financial and programmatic information and to incorporate expenditure and service goals established by, and presented in, the grant agreements entered into between the State Office of Economic Opportunity and sub-grantees. This format presents a ready means of assessing grantee performance and further affords the capability of off-site financial monitoring which can identify individual sub-grantee(s) or specific sub-grantee expense

Community Services Block Grant

accounts which should be subjected to on-site monitoring.

3. Regulations

The State Office of Economic Opportunity will develop no regulations or policies beyond those absolutely necessary to operate successfully with necessary program and fiscal accountability. Whenever possible, in addition to basic requirements contained in grant agreements between the State Office of Economic Opportunity and the sub-grantee, rules and policies will be issued in the form of numbered policy memoranda to all sub-grantees on an "as needed" basis with a timely effective date. The provisions of such memoranda will be binding for CSBG sub-grantees. The provisions of "Vermont CSBG Uniform Requirements for Grants and Agreements with Non-profit Organizations" and the "Vermont CSBG Cost Principles for Non-Profits" will apply to the administration of the program.

4. Audit Requirements

Any funds made available to the sub-grantees by the State Office of Economic Opportunity from the CSBG will be audited on an annual basis in accordance with the standards for Audit of Governmental Organizations, programs, Activities, and Functions, 1981 Revisions, and Guidelines for Financial and Compliance Audits of Federally Assisted programs, and OMB Circular A-133.

In accordance with Section 1745 of the OBRA of 1981, the State Office of Economic Opportunity shall enter into agreement with the office of the State Auditor or an independent CPA firm to conduct a financial and compliance audit of its administration of funds received under the CSBG in accordance with the General Accounting Office audit guide. Within 30 days after the completion of this audit, the Governor shall submit a copy of it to the State Legislature and to the Secretary of HHS.

5. State Responsibilities and Services

The State Office of Economic Opportunity is accountable to the Governor, Agency of Human Services Secretary, State Legislature, U.S. Department of Health and Human Services and the Congress for all aspects of grant management and program operation. Therefore, it will closely monitor program and fiscal management activities of its sub-grantees to ensure that services are being provided in an effective and efficient manner and that goals are being achieved.

Effective technical assistance and on-site monitoring can be accomplished through careful review and in-depth evaluation of fiscal and programmatic reports. Such analyses will identify any variance in planned progress toward the attainment of defined goals and will enable the State Office of Economic Opportunity to provide assistance or initiate the necessary action as necessary to remedy the situation. The Office of Economic Opportunity will provide a wide range of technical assistance to the sub-grantees to assist them in provision of services to clients.

Additionally, all eligible entities will receive on-site visits by Office of Economic Opportunity staff in order to conduct formal reviews of the sub-grantee's accounting system and procedures, personnel and travel policies, management systems and program activities in order to assure programmatic and management accountability.

Community Services Block Grant

Written reports detailing monitoring findings - both positive and negative - will be submitted to the Chief Administrator of the Office of Economic Opportunity. The Chief Administrator will, where appropriate and necessary, initiate corrective action measures detailing the specific steps that must be taken in order to achieve compliance with defined goals and standards. Such corrective measures will be communicated to the Executive Director of the particular agency, who will be responsible for implementing the required action.

VI. USE, SUSPENSION OR TERMINATION OF FUNDS

I. Use of Funds

Funds given to grantees pursuant to this plan must be used in furtherance of the goals and objectives set forth in Section II above and will be governed by a grant agreement between the State Office of Economic Opportunity and the sub-grantee as well as this plan and applicable law. The grant agreement shall be based on the sub-grantee's application for funding as approved. The Office of Economic Opportunity may condition the sub-grantee's receipt of the block grant funds on such terms as the State deems appropriate, provided the terms are consistent with and in furtherance of this plan and the Federal law governing CSBG.

A cash advance in an amount sufficient to fund one quarter's operation shall be made to each agency upon the effective date of the grant executed with the State Office of Economic Opportunity.

Subsequent transmittals of cash shall be made in quarterly payments, which may contain a blend of reimbursement and advance. In the event that a continuing resolution or similar action should delay the determination of the State's CSBG allocation, or temporarily restrict spending authority, the State Office of Economic Opportunity, may, at its discretion, amend this procedure to make monthly payments, or restrict payments to reimbursement of actual eligible costs up to a level specified in the Community Action Agency's approved monthly expenditure plan.

2. Local Sub-grantee Administration Costs

While there is no limitation on administrative expenditures at the local level imposed by the Act, such limitations may be imposed by applicable management circular of the Federal Office of Management and Budget. However, the State Office of Economic Opportunity expects agencies to establish reasonable levels of administrative cost.

Reasonable administrative costs will be determined through the process of grant negotiations, and expenditures will consequently be governed by the levels established by the grant.

3. Suspension or Termination of Funds

The State Office of Economic Opportunity may suspend funding to a sub-grantee if the agency fails to submit accurate reports on the dates the reports are required. Funding may also be suspended if monitoring reports or independent audit reports indicate substantial noncompliance with Federal legislation, program regulations, established State policy, grant requirements, generally accepted accounting procedures or fiscal control procedures.

Community Services Block Grant

VII. PUBLIC PARTICIPATION

The State supports maximum feasible participation of all interested persons and groups in the development and implementation of CSBG programs at the state and local level, in an advisory capacity. Therefore, it expects local agencies to continue meaningful participation of the public, private and low-income sectors in the planning and operation of programs under the CSBG. Limited purpose sub-grantees and other interested parties are invited to attend the public and legislative hearings which will review this plan. In addition, copies of the plan will be available for public inspection from the State Office of Economic Opportunity.

VIII. PROVISION OF ASSURANCES

Public Law Citation: Community Services Block Grant Act, Title VI, Subtitle B, of the Omnibus Budget Reconciliation Act of 1981, P.L. 97-35; and Human Services Reauthorization Act of 1984, P.L. 98-558, P.L. 99-425, and P.L. 101-501, and P.L. 103-252; COATS Human Services Reauthorization Act of 1998, and the Omnibus Consolidated Appropriation Act of 2000, Public Law 106-113.

I. Certifications

The State of Vermont will use the funds available under the Community Services Block Grant to assure that, at its discretion and consistent with agreements with the State, each recipient of funds available under this subtitle will use such funds.

675(c)(1)(A) provide a range of services and activities having a measurable and potentially major impact on causes of poverty in the community or those areas of the community where poverty is a particularly acute problem;

675(c)(1)(B) provide activities designed to assist low-income participants including homeless individuals and families, migrants, and the elderly poor.

- (i) to secure and retain meaningful employment
- (ii) to attain an adequate education;
- (iii) to make better use of available income;
- (iv) to obtain and maintain adequate housing and a suitable living environment;
- (v) to obtain emergency assistance through loans or grants to meet immediate and urgent individual family needs, including the need for health services, nutritious food, housing and employment-related assistance;
- (vi) to remove obstacles and solve problems which block the achievement of self-sufficiency;
- (vii) to achieve greater participation in the affairs of the community; and
- (viii) to make more effective use of other programs related to the purpose of this subtitle;

675(c)(1)(C) provide on an emergency basis for the provision of such supplies and services,

Community Services Block Grant

nutritious foodstuffs and related services, as may be necessary to counteract conditions of starvation and malnutrition among the poor;

675(c)(1)(D) coordinate and establish linkages between governmental and other social services programs to assure the effective delivery of such services to low-income individuals; and

675(c)(1)(E) encourage the use of entities in the private sector of the community in efforts to ameliorate poverty in the community;

675(c)(2)(A) use, for FY85 and for each subsequent fiscal year, not less than 90 percent of the funds allotted to the State under Section 674 to make grants to use for the purpose described in clause (1) to eligible entities (as defined in Section 673(1) or to organizations serving seasonal or migrant farm workers, except that no more than 7 percent of the funds available for this sub-clause shall be granted to organizations which were not eligible entities during the previous fiscal year;

2. Assurances/Provisions to Ensure Compliance

Assurance: Section 675(c)(2)(B)

If less than 100 percent of the allotment is expended under subparagraph (A), provide assurances that with respect to the remainder of the allotment a reasonable amount shall be used for -

- (i) providing training and technical assistance to those entities in need of such assistance and such activities will not be considered administrative expenses;
- (ii) coordinating State-operated programs and services targeted to low-income children and families with services provided by eligible entities funded under this subtitle; including out posting appropriate State or local public employees into entities funded under this subtitle to ensure increased access to services provided by such State or local agencies;
- (iii) supporting statewide coordination and communication among eligible entities;
- (iv) Administrative expenses at the State level, including monitoring activities, but not more than the greater of \$55,000 or 5 percent of its allotment under section 674; and
- (v) considering the distribution of funds under this subtitle within the State to determine if such funds have been targeted to the areas of greatest need.

Provision:

Upon notification of its CSBG allocation, the State prepares a plan for the use and distribution of funds. The plan includes a formula for the distribution of funds to ensure funds have been

Community Services Block Grant

targeted to areas of greatest need. The plan also includes a reserve **\$175,865** or 5 percent of the funds for the State's administration. All other funds are awarded for discretionary projects to eligible entities based on a grant proposal to this Office. Discretionary funds are used for: training of eligible entity staff and Boards, purchase of computer software to ensure accurate data and performance management, promising pilot demonstrations to promote the self-sufficiency of low income Vermonters through asset building strategies, assistance in the delivery of activities to promote economic opportunity for low income women and girls, and additional services to low income Vermonters.

In addition, the State Office coordinates and convenes various task forces and working groups to ensure communication among eligible entities and other State and local service providers. These include: homelessness, hunger and housing as well as asset development.

Assurance:

The State will provide assurances that (A) in the case of a community action agency or nonprofit private organization, each board will be selected by the community action agency or nonprofit private organization and constituted so as to assure that

- (i) one-third of the members of the board are elected public officials, currently holding office, or their representatives, except that if the number of elected officials reasonably available and willing to serve is less than one-third of the membership of the board, membership on the board of appointive public officials may be counted in meeting such one-third requirement;
- (ii) at least one-third of the members are persons chosen in accordance with democratic selection procedures adequate to assure that they are representative of the poor in the area served; and
- (iii) the remainder of the members are officials or members of business, industry, labor, religious, welfare, education, or other major groups and interests in the community, and

Provision:

In order to ensure that the board of directors of the Community Action Agencies are constituted in accordance with Section 675(c)(3), the Request for Work Plan package to which agencies must respond to receive funds includes a section that requires the names, addresses, and phone numbers of all board members and requires each Community Action Agency to specify the sector each represents (public, private, low-income) as well as the process used to ensure the election of the low-income representatives is in accordance with democratic principles. Additionally, each Community Action Agency is required to denote the offices held and by whom and committee assignments. Further, grants for the provision of services require that minutes of the board meetings be submitted to the Office of Economic Opportunity to allow for ongoing monitoring of this requirement.

VERMONT HUMAN SERVICES PLAN - FY 2015
FEDERAL ASSURANCES & DOCUMENTATION Page B-20

Community Services Block Grant

Assurance: Section 675(c)(4)

The State will give special consideration to the designation of local community action agencies under this subtitle to any community action agency which is receiving funds under any Federal anti-poverty program on the date of the enactment of the Act, except that (A) the State shall, before giving such special consideration, determine that the agency involved meets program and fiscal requirements established by the State; and (B) if there is no such agency because of any change in the 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 is made.

Provision:

The State awards funds only to Community Action Agencies that were receiving funds under Federal anti-poverty programs on the date of enactment of the Act. The State plan for the distribution of funds, which is made available to the public and is subject to a public hearing, specifies the agencies eligible to receive funds.

Assurance: Section 675(c)(5)

The State will not transfer funds in excess of 5 percent of its allotment; if 5 percent of its allotment under Section 674 is transferred, it will be transferred for the provisions set forth in this subtitle to services under the energy crisis intervention program under Title XXVI of this Act (relating to low-income home energy assistance) or the Temporary Emergency Food Assistance Act of 1983.

Provision:

The CSBG Plan prepared by the State - and made available for public inspection and subject to public hearing - specifies that only 5 percent of the funds allocated to the State may be transferred as specified above. All other funds (amounts specified in the application and plan which are made available to the public) are allocated to Community Action Agencies, and other organizations and efforts intended to alleviate and reduce poverty.

Assurance: Section 675(c)(6)

Repealed by the Hatch Act Reform Amendments of 1994, P.L. 103-94.

Assurance: Section 675(c)(7)

The State will prohibit the use of any funds provided under this title for any activities to provide voters and prospective voters with transportation to the polls or to provide similar assistance in connection with an election or voter registration activity.

Community Services Block Grant

Provision:

Grants for the provision of services contain a clause which prohibits the use of any funds provided under the CSBG for any political activities. Monitoring of Community Action Agencies' activities insures continued compliance.

Assurance: Section 675(c)(8)

The State will provide for coordination between anti-poverty programs in each community, where appropriate, with emergency crisis intervention programs under Title XXVI of this Act (relating to low income home energy assistance);

Provision:

The Grantee for funds under Title XXVI of the Act (relating to low income home energy assistance) provides funds to the CSBG grantee, which in turn awards funds to Community Action Agencies to provide outreach services to potential home energy assistance recipients, thus ensuring coordination between anti-poverty programs.

Assurance: Section 675(c)(9)

The State will provide fiscal control and will establish fund accounting procedures as may be necessary to assure the proper disbursement of and accounting for Federal funds paid to the State under this subtitle including procedures for monitoring the assistance provided under this subtitle; and it will provide for an independent financial and compliance audit of this grant to meet the requirements as set out in Section 1745 of the Omnibus Reconciliation Act;

Provision:

The State financial system and fund accounting procedures provide strict controls that assure the proper disbursement and accounting for funds paid to the State under the Act. Community Action Agencies awarded funds are required to report on the expenditure of funds (including the amounts and purpose of the expenditures) on a monthly basis, thus allowing for ongoing monitoring of the use of the funds. Community Action Agencies are required to conduct an annual, agency-wide audit of all funds, and to submit those audits to the State.

Assurance: Section 675(c)(10)

The State will permit and cooperate with Federal investigations undertaken in accordance with Section 679 of this Act.

Provision:

The State will permit and cooperate with any federal investigations undertaken in accordance with

Community Services Block Grant

Section 679 of the Act. Grants for the provision of services contains a clause that specifies that all books, documents, accounting records, etc. pertinent to CSBG funds will be maintained and made available at reasonable times for the inspection by any authorized agent of the State or Federal government, thus insuring cooperation at all levels.

Assurance: Section 675(c)(II)

The State agrees to "provide assurances that any community action agency or migrant and seasonal farm worker organization which received funding in the previous fiscal year under the Act will not have its present or future funding terminated under this Act or reduced below the proportional share of funding it received in the previous year, unless after notice, and opportunity for hearing on the record, the State determines that cause existed for such termination or reduction subject to the procedures and review by the Deputy Secretary as provided in Section 676A."

- (A) For purposes of making a determination with respect to a funding reduction, the term "cause" includes:
- (i) a statewide redistribution of funds under this subtitle to respond to:
 - a. the results of the recently available census or other appropriate data;
 - b. the establishment of a new eligible entity;
 - c. severe economic dislocation; and
 - (ii) the failure of an eligible entity to comply with the terms of its agreement to provide services under this subtitle."
- (B) For purposes of making a determination with respect to a termination, the term 'cause' includes the material failure of an eligible entity to comply with the terms of its agreement and community action plan to provide services under this subtitle.

Provision:

All Vermont CSBG program operators are Community Action Agencies which received funding under the Act in the previous fiscal year. Only current CSBG program operators are recipients of the Request for Work Plan grant package for FY 2015, and all funds provided (except for State administration and the Discretionary pool) for the CSBG in FY 2015 and beyond will be obligated to these entities according to the 90 percent statutory rule. It is the State's intention to continue funding these agencies, provided that they meet the intent and requirements of the Act, grant obligations to the State, and comply with State and Federal laws and regulations, and Uniform Administrative Requirements prescribed by OMB.

All Community Action Agencies in Vermont that have received funds in the previous fiscal year will be notified as soon as practical, but no less than thirty days before the new fiscal year of status of funding for the upcoming fiscal year. If the State determines that for some substantiated reason

Community Services Block Grant

that a Community Action Agency is not meeting its grantee obligation, the State will notify the agency in writing of its determination and utilize the thirty day cancellation clause. This written notice will be the last resort after all reasonable attempts have been made to resolve and rectify the noncompliance.

The Community Action Agency has the right to appeal the cancellation of its CSBG grant agreement or failure to receive a new grant to the Vermont Agency of Human Services "Human Services Board" as described in Vermont Statutes Annotated, Title 3, Section 3090 and 3091. This provides for proper notice, the conducting of hearings and an appeal process.

The final termination of CSBG funds is subject to review by the Secretary as provided in Section 676A.

Additionally, the State assures that it will meet the requirements of Section 1742(a) and (b) as required in P.L. 97-35.

Assurance: Section 675(c)(12)

In the case of a State which applied for and received a waiver from the Deputy Secretary under Public Law 98-139 (Colorado, Utah, and Wyoming) "provide assurances that funds will not be provided under this subtitle (Community Services Block Grant Act) by such State to an organization to which such State made under this subtitle in fiscal year 1984 unless such organization allows, before expending such funds, low-income individuals to comment on the uses for which such organization proposes to expend such funds."

Assurance: Section 675(c)(13)

- (13) secure from each eligible entity as a condition to its receipt of funding under this Act a community action work plan (which shall be available to the Secretary for inspection) that includes –
- (A) a community needs assessment (including food needs);
 - (B) a description of the service delivery system targeted to low-income individuals and families in the service area;
 - (C) a description of how linkages will be developed to fill identified gaps in services through information, referral, case management, and follow-up consultations;
 - (D) a description of how funding under this Act will be coordinated with other public and private resources; and
 - (E) a description of outcome measures to be used to monitor success in promoting self-sufficiency, family stability, and community revitalization.

Community Services Block Grant

Provision:

The Office of Economic Opportunity has developed the following Request for Work Plan package that is distributed to all eligible entities. The Request for Work Plan outlines broad goals and the general activities allowed under the Act, and require detailed sub-grantee responses which delineate specific activities to be undertaken by the sub-grantees in their efforts to achieve the purposes of the Act. All requirements of Section 675(c)(13) are met by this Request for Work Plan.