

Community Services Block Grant

**COMMUNITY SERVICES
BLOCK GRANT (CSBG)
Fiscal Year 2016 Only**

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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 sub-grantees 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. The plan follows the prescribed format from the HHS Office of Community Services.

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SECTION 1: CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact and Official State Designation Letter

- 1.1. Provide the following information in relation to the lead agency designated to administer CSBG in the State, as required by Section 676(a) of the CSBG Act.

Vermont Agency of Human Services

Authorized official: Dixie Henry, Deputy Secretary, Office of the Secretary

280 State Drive, Waterbury, Vermont 05671

(802) 871-3008

Dixie.henry@vermont.gov

<http://humanservices.vermont.gov/>

- 1.2. Provide the following information in relation to the designated State CSBG point of contact.

Office of Economic Opportunity, Department for Children & Families, Agency of Human Services

Sarah Phillips, Interim Chief Administrator, Office of Economic Opportunity

280 State Drive, Waterbury, Vermont, 05671-1801

(802) 769-6409

Sarah.phillips@vermont.gov

<http://dcf.vermont.gov/oeo/>

- 1.3. **Designation Letter:** State's official CSBG designation letter is attached.

SECTION 2: State Legislation and Regulation

- 2.1. **CSBG State Legislation:** Does the State have a statute authorizing CSBG? Yes

- 2.2. **CSBG State Regulation:** Does the State have regulations for CSBG? No

- 2.3. Attach a copy of legislation and/or regulations or provide a hyperlink(s), as appropriate.

VSA Title 3, Chapter 59, Community Service Agencies

<http://legislature.vermont.gov/statutes/fullchapter/03/059>

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2.4. State Authority:

- 2.4a.** Did the State legislature enact authorizing legislation, or amendments to an existing authorizing statute, last year? No
- 2.4b.** Did the State establish or amend regulations for CSBG last year? No
- 2.4c.** Does the State statutory or regulatory authority designate the bureau, division, or office in the State government that is to be the State administering agency? Yes

SECTION 3: State Plan Development and Statewide Goals

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

The mission of the Agency of Human Services is to improve the health and well-being of Vermonters and to protect those among us who are unable to protect themselves. The Agency of Human Services was created by the Vermont Legislature to serve as the umbrella organization for all human service activities within state government. 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.

3.2. State Plan 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;
 - 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;

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- 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.

State's CSBG-specific goals for State administration:

For the period covered by this State CSBG Plan, the Office of Economic Opportunity has set the following goals for State administration:

1. Support eligible entities to integrate financial capability services within their agency as appropriate;
2. Support eligible entities in meeting all organizational standards.

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

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3.3a. Analysis of:

- X State Performance Indicators and/or National Performance Indicators (NPIs)
- X State performance management data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)
- X Eligible entity community needs assessments
- X Eligible entity plans

3.3b. Consultation with

- X Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)
- X State community action association and regional CSBG T & TA providers

3.4. Eligible Entity Involvement

3.4a. Describe the specific steps the State took in developing the State Plan to involve the eligible entities.

The State Office of Economic Opportunity has discussed the State Plan process and new model format with the Vermont Community Action Partnership (State association), which includes the Executive Directors from each of Vermont's five Community Action Agencies. Each eligible entity also received a copy of the draft State Plan to provide feedback and was invited to the public hearing.

SECTION 4: CSBG Hearing Requirements

SECTION 4 of the plan will completed after the public hearing is held.

- 4.1. Public Inspection:** Describe how the State made this State Plan, or revision(s) to the State Plan, available for public inspection, as required under Section 676(e)(2) of the Act.
- 4.2. Public Notice/Hearing:** Describe how the State ensured there was sufficient time and statewide distribution of notice of the public hearing(s) to allow the public to comment on the State Plan, as required under 676(a)(2)(B) of the CSBG Act.

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

Date	Location	Type of Hearing
		Combined

4.4. Supporting documentation for the public and legislative hearings is attached.

SECTION 5: CSBG Eligible Entities

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

CSBG Eligible Entity	Public or Nonprofit	Type of Entity	Geographical Area Served by county (Provide all counties)
BROC – Community Action in Southwestern Vermont	Nonprofit	Community Action Agency	Rutland, Bennington Counties (except Pittsfield Town)
Capstone Community Action	Nonprofit	Community Action Agency	Lamoille, Orange, Washington Counties, and Pittsfield, Granville, Hancock, Rochester, Bethel, Stockbridge, Royalton, Sharon and Barnard Towns
Champlain Valley Office of Economic Opportunity	Nonprofit	Community Action Agency	Chittenden, Franklin, Grand Isle Counties, and in Addison County (except Hancock and Granville Towns)
Northeast Kingdom Community Action	Nonprofit	Community Action Agency	Caledonia, Essex, Orleans Counties
Southeastern Vermont Community Action	Nonprofit	Community Action Agency	Windham and Windsor Counties (except Rochester, Bethel, Stockbridge, Royalton, Sharon and Barnard Towns)

5.2. Total number of CSBG eligible entities: 5

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5.3. Changes to Eligible Entities List: Has the list of eligible entities under item 5.1 changed since the State's last State Plan submission?

No.

SECTION 6: Organizational Standards for Eligible Entities

6.1. Choice of Standards:

X The State will use the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138).

6.2. If the State is using the COE-developed organizational standards, does the State propose making a minor modification to the standards, as described in IM 138?

No changes are proposed.

6.3. How will/has the State officially adopt(ed) organizational standards for eligible entities in the State in a manner consistent with the State's administrative procedures act?

X Contracts with eligible entities

6.4. How will the State assess eligible entities against organizational standards, as described in IM 138?

X Self-assessment (with validation by the State or State-authorized third party)

X Regular, on-site CSBG monitoring

6.4a. Describe the assessment process.

The State Office of Economic Opportunity will annually distribute Vermont's Assessment Tool for CSBG Organizational Standards. Agencies will self-assess and submit the completed tool along with documentation. The State Office of Economic Opportunity will review and validate the assessment. This process will be completed prior to or as part of the annual Work Plan submission process. During regular onsite monitoring, the assessment tool will be completed by staff of the State Office of Economic Opportunity and documentation reviewed onsite.

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6.5. Will the State make exceptions in applying the organizational standards for any eligible entities due to special circumstances or organizational characteristics, as described in IM 138?

Not at this time.

SECTION 7: State Use of Funds

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

7.1 Formula: Select the method (formula) that best describes the current practice for allocating CSBG funds to eligible entities.

X Other:

Historic Base + Formula with Variables

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; five percent 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.

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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.

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).

7.1a. Does the State statutory or regulatory authority specify the terms or formula for allocating the 90 percent funds among eligible entities?

No.

7.2. Planned Allocation: Specify the planned allocation of 90 percent funds to eligible entities, as described under Section 675C(a) of the CSBG Act. The estimated allocations may be in dollars or percentages.

Planned CSBG 90 Percent Funds	
CSBG Eligible Entity	Funding Amount \$

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Planned CSBG 90 Percent Funds	
BROC – Community Action in Southwestern Vermont	\$569,386
Capstone Community Action	\$608,436
Champlain Valley Office of Economic Opportunity	\$936,151
Northeast Kingdom Community Action	\$586,155
Southeastern Vermont Community Action	\$496,596
Total	\$3,196,724

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

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. 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. Work Plans must include a line item budget and a monthly expenditure plan. All Work Plans are reviewed by the State Office of Economic Opportunity within 30 days of receipt. 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.

Funds given to grantees pursuant to this plan must be used in furtherance of the goals and objectives set forth 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. Applications 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.

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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. Payments are NET 30 days. 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.

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

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

- 7.6.** What amount of State CSBG funds does the State plan to allocate for administrative activities, under this State Plan? The estimate may be in dollars or a percentage.

In accordance with Section 675C(b)(2) of the CSBG Act, the State plans to reserve \$55,000 or 5% of its grant (whichever is greater) for administrative activities.

- 7.7.** How many State staff positions will be funded in whole or in part with CSBG funds under this State Plan?

Three positions are funded in part with CSBG funds under this State Plan.

- 7.8.** How many State Full Time Equivalent (FTEs) will be funded with CSBG funds under this State Plan?

Approximately 2 FTEs will be funded with CSBG funds under this State Plan.

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

- 7.9.** Does the State have remainder/discretionary funds? Yes

If yes was selected, describe how the State plans to use remainder/discretionary funds in the table below.

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Use of Remainder/Discretionary Funds		
Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned %	Brief description of services/activities
a. Training/technical assistance to eligible entities	25%	These planned services/activities are described in State Plan item 8.1
b. Coordination of State-operated programs and/or local programs	25%	Coordination with homeless continua of care and homeless assistance programs.
c. Statewide coordination and communication among eligible entities	0%	n/a
d. Analysis of distribution of CSBG funds to determine if targeting greatest need	0%	n/a
e. Asset-building programs	25%	Demonstration projects and training and technical assistance for innovative asset-building or financial capability programs, including at Community Action Agencies.
f. Innovative programs/activities by eligible entities or other neighborhood groups	25%	Other innovative activities at eligible entities or other community-based nonprofits, such as those serving low income women or girls, addressing food security/systems, or promising practices to address homelessness.
g. State charity tax credits	0%	n/a
h. Other activities, specify	25%	Unforeseen or urgent requests for eligible entities or other eligible community-based nonprofits; including technical assistance to other community-based nonprofits.
Totals	100%	

7.10. What types of organizations, if any, does the State plan to work with (by grant or contract using remainder/discretionary funds) to carry out some or all of the activities in table 7.9.

- X CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds): Five eligible entities
- X Other community-based organizations
- X State Community Action association, by way of fiscal agent
- X Individual consultant(s)
- X Other: The State may carry out some activities directly.

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SECTION 8: State Training and Technical Assistance

8.1. Describe the State’s plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan by completing the table below. Add a row for each activity: indicate the timeframe; whether it is training, technical assistance or both; and the topic.

Training and Technical Assistance			
Fiscal Year (Y) Quarter (Q) / Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
<ul style="list-style-type: none"> • All quarters 	<ul style="list-style-type: none"> • Technical Assistance 	<ul style="list-style-type: none"> • Reporting • ROMA 	
<ul style="list-style-type: none"> • FY1 – Q4 	<ul style="list-style-type: none"> • Training 	<ul style="list-style-type: none"> • Reporting • ROMA 	
<ul style="list-style-type: none"> • Ongoing / Multiple Quarters 	<ul style="list-style-type: none"> • Both 	<ul style="list-style-type: none"> • Organizational Standards – General • Organizational Standards – for eligible entities with unmet standards on Technical Assistance or Quality Improvement Plans 	
<ul style="list-style-type: none"> • Ongoing / Multiple Quarters 	<ul style="list-style-type: none"> • Both 	<ul style="list-style-type: none"> • Other 	Other: integrating financial capability services
<ul style="list-style-type: none"> • Ongoing / Multiple Quarters • FY1 – Q3 	<ul style="list-style-type: none"> • Training 	<ul style="list-style-type: none"> • Other 	Other: promising and evidence-based practices in ending poverty Other: cross sector skills or general nonprofit management skills; e.g., leadership development, cultural competency, strategic communication, collective impact, leading change, board development, compassion

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Training and Technical Assistance			
Fiscal Year (Y) Quarter (Q) / Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
			fatigue, working with different populations, etc.

8.1a. The planned budget for the training and technical assistance plan (as indicated in the Remainder/Discretionary Funds table in item 7.9): 25%

8.2. Does the State have in place Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs) for all eligible entities with unmet organizational standards, if appropriate?

n/a – first year

8.3. Indicate the types of organizations through which the State plans to provide training and/or technical assistance as described in item 8.1, and briefly describe their involvement? (Check all that apply.)

- CSBG eligible entities: (if checked, provide the expected number of CSBG eligible entities to receive funds) one
- State Community Action association
- National technical assistance provider(s)
- Individual consultant(s)
- Other: The State will provide some Training and Technical Assistance directly.

SECTION 9: State Linkages and Communication

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

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

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

The State Office of Economic Opportunity coordinates with other State Offices to create or maintain access for low income Vermonters and communities to a variety of services and to avoid duplication of services. The State Office of Economic Opportunity is also the State Weatherization Office and administers federal homeless assistance funds. In addition, the State Office is a division within the Department for Children and Families which includes the State Offices for LIHEAP, TANF, Head Start, Child Welfare, and SNAP. The State Office Administering LIHEAP provides funds to the State CSBG Office, 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. In a similar way, the State Office administering SNAP Employment and Training provides funds to the State CSBG Office, which in turn awards funds to Community Action Agencies providing self-employment training to SNAP recipients.

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, housing and asset development. The State Office also participates in a number of inter and intra-Agency groups and initiatives which include various offices such as a housing program for families served by the child welfare office, coordination with the State Agency of Education homeless liaison office, participation in the State Consolidated Plan for Housing, trauma-informed care, financial capability integration within the State TANF program, and more.

9.2. State Linkages and Coordination at the Local Level: Describe the linkages and coordination at the local level that the State plans to create or maintain with governmental and other social services, especially antipoverty programs, to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as

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required by assurances under Sections 676(b)(5) and (b)(6)). Attach additional information as needed.

The State Office of Economic Opportunity actively participates in both Vermont's Homeless Continuum of Care to assure the effective delivery of CSBG services to low-income people and communities and to avoid duplication of services. As administrator of federal and state funds for homeless assistance, the State Office also works in direct partnership with local homeless service agencies. The State of Vermont does not have county government; the Agency of Human Services (AHS) employs Field Service Directors in each of the 12 AHS districts. The Field Service Division explicitly seeks to maximize the effectiveness of the human services system in each district of the state and support human services integration within State government and with community partners. The State CSBG Office works in partnership with the Field Services Division and eligible entities to support local linkages and coordination, especially antipoverty programs.

9.3. Eligible Entity Linkages and Coordination

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

The Office of Economic Opportunity has developed a 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. The Request for Work Plan is submitted annually before the beginning of the grant year. It is approved by the eligible entity's governing board and signed by the chief governing official of the board. The FY 2016 Request for Work Plan package is attached.

The Request for Work Plan requires eligible entities to describe how they will coordinate and establish linkages to assure the effective delivery of and coordination of CSBG services as required by Section 676(b)(5) of the CSBG Act.

9.3b State Assurance of Eligible Entity Linkages to Fill Service Gaps: Describe how the eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations,

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according to the assurance under Section 676(b)(3)(B) of the CSBG Act. **[Narrative, 2500 Characters]**

The Request for Work Plan package requires eligible entities to describe how they will develop linkages to fill identified gaps in services and fully meet Section 676(b)(3)(B) of the CSBG Act.

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

Yes.

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

The State has not yet completed its WIOA Combined Planning process but intends to include CSBG employment and training activities as part of the plan. The CSBG Request for Work Plan requires that eligible entities describe local coordination with WIOA workforce development systems, as well as other employment and training activities, in order to fully meet Section 676(b)(5) of the CSBG Act.

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

The State Office Administering LIHEAP provides funds to the State CSBG Office, 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 and meeting the requirements of Section 676(b)(6) of the CSBG Act.

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9.6. State Assurance: Faith-based Organizations, Charitable Groups, Community Organizations:

Describe how the State will assure local eligible entities will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations, according to the State’s assurance under Section 676(b)(9) of the CSBG Act.

The Request for Work Plan package requires eligible entities to describe how they will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations in order to fully meet Section 676(b)(9) of the CSBG Act.

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

The Request for Work Plan package requires eligible entities to describe how they will coordinate with other public and private resources in order to fully meet Section 676(b)(3)(C) of the CSBG Act.

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

The State Office of Economic Opportunity regularly attends the Vermont Community Action Partnership meetings (State Community Action Association), currently convened monthly by the Partnership. The Vermont Community Action Partnership includes representatives from all five Vermont eligible entities. The State Office also coordinates with the Partnership on training and technical assistance efforts to support eligible entities, including work through the Regional Performance and Innovative Consortia and related to organizational standards.

9.9 Communication with Eligible Entities and the State Community Action Association: In the table below, describe the State’s plan for communicating with eligible entities, the State Community Action Association, and other partners under this State Plan.

Communication Plan		
Topic	Expected Frequency	Format
Vermont Community Action Partnership Meetings: All topics related to implementing the requirements of the CSBG Act, training and technical assistance planning, linkages and	Monthly	Meetings/ Presentation

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Communication Plan		
Topic	Expected Frequency	Format
coordination at the state and local level, community needs, etc.		
Updates on state or local linkages or coordination, other requirements related to CSBG implementation	As needed, weekly or more	Email; ad hoc web-based meetings or conference calls
Hearings related to the State Plan	Annually	Email
Performance Management Workgroup	Quarterly	Web-based meetings

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

Within 60 calendar days of receiving feedback from OCS regarding State performance on State Accountability Measures, the State will share this feedback with the Vermont Community Action Partnership (State Association) and its members, which include all eligible entities, at its monthly meeting or by email.

SECTION 10: Monitoring, Corrective Action, and Fiscal Controls

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

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

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

CSBG Eligible Entity	Review Type	Target Date	Date of Last Full Onsite Review (if applicable)
BROC – Community Action in Southwestern Vermont	Full onsite	FY1 Q4	June 27 th and July 26 th , 2013

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CSBG Eligible Entity	Review Type	Target Date	Date of Last Full Onsite Review (if applicable)
Capstone Community Action	Full onsite	FY1 Q4	July 18 th and August 7 th , 2013
Champlain Valley Office of Economic Opportunity	Full onsite	FY1 Q4	June 20 th and July 9 th , 2013
Northeast Kingdom Community Action	Full onsite	FY1 Q4	June 25 th and August 3rd, 2013
Southeastern Vermont Community Action	Full onsit	FY1 Q4	July 29 th , 2013

10.2. Monitoring Policies: Provide a copy of State monitoring policies and procedures by attaching and/or providing a hyperlink.

Please see attached Vermont CSBG Plan Addendum.

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

45 days.

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

10.4. Closing Findings: Are State procedures for addressing eligible entity findings/deficiencies, and the documenting of closure of findings included in the State monitoring protocols attached above? Yes

10.5. Quality Improvement Plans (QIPs): How many eligible entities are currently on Quality Improvement Plans?

None.

10.6. Reporting of QIPs: Describe the State’s process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the State approving a QIP?

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When an eligible entity is on a Quality Improvement Plan as approved by the State Office of Economic Opportunity, the State Office will file a written report with the Office of Community Services within 30 calendar days.

10.7. Assurance on Funding Reduction or Termination: Does the State assure, according to Section 676(b)(8), that “any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b).”

Yes.

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

10.8. Does the State CSBG statute and/or regulations provide for the designation of new eligible entities?

Yes.

10.8a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for the designation of new eligible entities.

VSA Title 3, Chapter 59, Community Service Agencies

<http://legislature.vermont.gov/statutes/fullchapter/03/059>

10.9. Does the State CSBG statute and/or regulations provide for de-designation of eligible entities?

No.

10.9a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for de-designation of new eligible entities.

Please see attached Vermont CSBG Plan Addendum.

10.10. Does the State CSBG statute and/or regulations specify a process the State CSBG agency must follow to re-designate an existing eligible entity?

No.

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10.10a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for re-designation of existing eligible entities.

Please see attached Vermont CSBG Plan Addendum.

Fiscal Controls and Audits and Cooperation Assurance

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

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.

Estimated draws occur biweekly for administrative and program expenditures. At the beginning of the quarter, AHS calculates an estimate based on the prior quarter's actual expenditures. This amount is divided over the number of draws that will be made during the quarter. Reconciling draws are performed once the reports are completed and included on a quarterly SF-425 report, which the State uses to compare awards, expenditures and draws. When the State determines that they have overdrawn or under drawn federal funds, they perform a reconciling draw to draw in or return the funds.

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

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, Guidelines for Financial and Compliance Audits of Federally Assisted programs, and OMB Circulars. All single audits are reviewed by the State Office and the Internal Audit Group at the Agency of Human Services.

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For additional information on eligible entity audits, please see attached Vermont CSBG Plan Addendum.

10.13. Assurance on Federal Investigations: Will the State “permit and cooperate with Federal investigations undertaken in accordance with Section 678D” of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act?

Yes.

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SECTION 11: Eligible Entity Tripartite Board

11.1. Which of the following measures are taken to ensure that the State verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B of the CSBG Act?

X Review copies of Board meeting minutes

X Track Board vacancies/composition

X Other: In order to ensure that the board of directors of the Community Action Agencies are constituted in accordance with Section 676B, 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.

11.2. How often does the State require eligible entities (which are not on TAPs or QIPs) to provide updates (e.g., copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc.) regarding their Tripartite Boards?

X Annually

X Other: Contracts with eligible entities 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.

11.3. Assurance on Eligible Entity Tripartite Board Representation: Describe how the State will carry out the assurance under Section 676(b)(10) of the CSBG Act that the State will require eligible entities to have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entities' Tripartite Board.

The Request for Work Plan package requires eligible entities to describe how eligible entities allow individuals and organizations to petition for adequate representation on an eligible entities' Tripartite Board and fully meet Section 676(b)(10) of the CSBG Act.

11.4. Does the State permit public eligible entities to use, as an alternative to a Tripartite Board, "another mechanism specified by the State to assure decision-making and participation by low-

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income individuals in the development, planning, implementation, and evaluation of programs” as allowed under Section 676B(b)(2) of the CSBG Act.

n/a – No public entities

Section 12: Individual and Community Income Eligibility Requirements

12.1. Required Income Eligibility: What is the income eligibility threshold for services in the State?

X 125% of the HHS poverty line

12.1a. Describe any State policy and/or procedures for income eligibility, such as treatment of income and family/household composition.

Vermont’s Community Action Agencies will use 125% of Federal HHS Poverty Guidelines as the standard for determining CSBG income eligibility. This will be calculated based on a household’s gross income in the past 30 days, excluding tax refunds.

12.2 Income Eligibility for General/Short Term Services: For services with limited in-take procedures (where individual income verification is not possible or practical), how does the State ensure eligible entities generally verify income eligibility for services? An example of these services is emergency food assistance.

Documentation: Acceptable forms of documentation include: current pay stubs, bank statements or tax documents; or a printout from the State’s Access system showing financial benefits received. If none of the above are available and it is reasonable to assume the household is income eligible, the Community Action Agency may use a written certification, signed by the client and community action staff, showing the household’s income in the past thirty days.

Tax Refunds Not Counted as Income: The total amount of a tax refund received – regardless of whether the refund is the result of a refundable credit, over-withholding, or both – is disregarded as income and resources.

Self-Employment: Where a member of the household is self-employed, gross revenues clearly tied to a business, and offset by the legitimate operating expenses of that business, shall not be considered household income. However, any personal income earned through self-employment shall be considered part of household income.

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Programs Funded in Part by CSBG: Where a program is partially funded by CSBG, a proportional share of clients served by the program must meet CSBG eligibility guidelines.

Direct Assistance: A household receiving CSBG direct assistance dollars (such as a rental payment to prevent eviction, or a grant to open a small business) must be income eligible at the time of assistance. Their file must contain appropriate documentation. Failure to document eligibility in connection with financial assistance may result in the eligible entity having to repay funds.

12.3. Community-targeted Services: For services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations), how does the State ensure eligible entities' services target and benefit low-income communities?

Where a program or initiative is partially funded by CSBG, a proportional share of clients served by the program must meet CSBG eligibility guidelines. In the case of community-targeted services, documentation could include county or town-level data from sources such as the census, HUD or the State showing that a proportional share of residents in the targeted geography meets CSBG eligibility.

SECTION 13: Results Oriented Management and Accountability (ROMA) System

13.1. ROMA Participation: In which performance measurement system will the State and all eligible entities participate, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act?

X The Results Oriented Management and Accountability (ROMA) System

13.1a. If ROMA was selected in item 13.1, attach and/or describe the State's written policies, procedures, or guidance documents on ROMA.

Please see attached Request for Work Plan.

13.2. Indicate and describe the outcome measures the State will use to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization, as required under Section 676(b)(12) of the CSBG Act?

X CSBG National Performance Indicators (NPIs)

X NPIs and others

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Please see attached Request for Work Plan.

13.3. How does the State support the eligible entities in using the ROMA system (or alternative performance measurement system)?

The State Office convenes a quarterly Community Action performance management workgroup with teams from each eligible entity. This group supports the use of National Performance Indicator reports. This includes technical review for uniformity and consistent which leads to more reliable and meaningful comparisons of results across the state and over time. The group also shares effective practices used at each agency to incorporate the performance reports into planning and implementation (i.e., operationalizing the ROMA cycle). The State Office also provides ROMA orientation and training to Community Action staff and boards as needed.

The State of Vermont has adopted Results Based Accountability (RBA) in statute. RBA and ROMA are similar and complimentary results-driven performance management systems. In recent years, the State Office has offered training and technical assistance to eligible entities to identify how ROMA and the National Performance Indicators can translate into the specific RBA framework.

13.4. Eligible Entity Use of Data: How is the State validating that the eligible entities are using data to improve service delivery?

In addition to the workgroup discussed in 13.3, eligible entities are required to file a quarterly report on the National Performance Indicators to the State Office. The annual Work Plan also requires eligible entities to identify which National Performance Indicators they will track and report, with targets.

Community Action Plans and Needs Assessments

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

The Request for Work Plan (attached) 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 provides estimates of sub-grantee awards, and contains the following major components, outlined below:

Program Design

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Mission

Community Assessment

ROMA Implementation Plan

Indicators

Targets

Programs reporting

Management and Administration

Board structure and composition

Sub-grantee's organizational structure

Job descriptions of employees funded with CSBG

Operating procedure by which the sub-grantee identifies eligible clients

Evaluation and control systems

Budget/Financial Management

Line Item Budget

Financial Management Plan

Assurances

Signed assurances relative to activities undertaken and expenditures incurred with CSBG

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.

Responses to the Request for Work Plan will be utilized in the preparation of the State's contracts with eligible entities for the provisions of services. For this purpose, 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.

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

Each eligible entity 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.

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 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.

Please see attached Request for Work Plan.

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

14.1 Use of Funds Supporting Local Activities

CSBG Services

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

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

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- (II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

Needs of Youth

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

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

Coordination of Other Programs

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

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

The State assures that funds meet the requirements of 676(b)(1)(A), (B), and (C) through the Request for Work Plan process previously described. Please see attached Request for Work Plan.

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State Use of Discretionary Funds

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

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

Eligible Entity Service Delivery, Coordination, and Innovation

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

Eligible Entity Service Delivery System

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

Vermont CSBG 675C(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. The State describes the eligible entities in Section 5, *CSBG Eligible Entities*. The State further meets the requirements of 676(b)(3)(A) through the Request for Work Plan process previously described. Please see attached Request for Work Plan.

Eligible Entity Linkages – Approach to Filling Service Gaps

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

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

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

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

The State describes this assurance in the State Linkages and Communication section, item 9.7.

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

14.3d. 676(b)(3)(D) Describe “how the local entity will use the funds [made available under 675C(a)] to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting.”

The State assures that funds meet the requirements of 676(b)(3)(D) through the Request for Work Plan process previously described. Please see attached Request for Work Plan.

Eligible Entity Emergency Food and Nutrition Services

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

The State assures that funds meet the requirements of 676(b)(4) through the Request for Work Plan process previously described. Please see attached Request for Work Plan.

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

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

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

State Coordination/Linkages and Low-income Home Energy Assistance

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

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

Federal Investigations

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

The State addresses this assurance in the Fiscal Controls and Monitoring section, item 10.13.

Funding Reduction or Termination

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

The State addresses this assurance in the Fiscal Controls and Monitoring section, item 10.7.

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

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

The State describes this assurance in the State Linkages and Communication section, item 9.6.

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Eligible Entity Tripartite Board Representation

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

The State describes this assurance in the Eligible Entity Tripartite Board section, 11.3.

Eligible Entity Community Action Plans and Community Needs Assessments

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

The State describes this assurance in the ROMA section, 13.5 and 13.6.

State and Eligible Entity Performance Measurement: ROMA or Alternate system

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

The State describes this assurance in the ROMA section, items 13.1, 13.2, 13.3, and 13.4.

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Validation for CSBG Eligible Entity Programmatic Narrative Sections

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

The State provides information for each of the assurances directly in section 14 or in corresponding items throughout the State Plan.

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ATTACHMENT 1: Request for Work Plan

COMMUNITY SERVICES BLOCK GRANT

FY 2016 REQUEST FOR WORK PLAN

FOR THE PERIOD

OCTOBER 1, 2015 - SEPTEMBER 30, 2016

STATE OFFICE OF ECONOMIC OPPORTUNITY

280 STATE DRIVE

WATERBURY, VERMONT

05671-1801



Community Services Block Grant

I. INTRODUCTION

A. PROGRAM PURPOSE

The purpose of the Community Services Block Grant (hereinafter called CSBG) program is to ameliorate the causes and effects of poverty through the provision of a range of services and activities designed to have a measurable and potentially major impact on the causes of poverty in Vermont, especially in those communities where poverty is a particularly acute problem.

B. BACKGROUND INFORMATION

The State of Vermont accepted administrative responsibility for the CSBG as of October 1, 1981. The State Office of Economic Opportunity) was designated as the grantee for the CSBG program by the Governor.

Consistent with the intent of Congress in establishing block grants, the Department of Health and Human Services, Office of Community Services, imposed no requirements, restrictions or regulations other than those contained in the authorizing legislation. Of particular note with regard to the requirements contained herein, the State is required to:

"...provide that fiscal control and fund accounting procedures will be established as may be necessary to assure the proper dispersal of and accounting for Federal funds paid to the State under this subtitle, including procedures for monitoring the assistance provided under this subtitle..."

And the Reauthorization Act included the following:

"all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management System... ..for measuring performance and results and a description of outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization."

In the absence of specific requirements for the management of operations and the control of funds, the State has developed an administrative plan for the control of funds and activities that is consistent with sound management practices, while at the same time providing maximum flexibility to the operators of CSBG programs. The State is pleased with the progress made in the implementation of the CSBG by all parties involved and is confident that the systems developed provide, in large measure, the structure and procedures necessary to meet the requirements outlined above.

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C. PURPOSE OF THE REQUEST FOR WORK PLAN

The State is seeking a comprehensive program developed by the Community Action Agency to meet the purpose of the CSBG Act. The work plan allows for a clear presentation of the correlation between the agency plan and budgets; and allows for the development and presentation of performance indicators and outcome measures by which each agency will be able to monitor their progress toward the full implementation of Results Oriented Management and Accountability (ROMA) and attainment of the six National Anti-Poverty Goals. The Request for Work Plan package consists of the following major components:

- Program Design;
- ROMA Implementation Plan;
- Management and Administration;
- Budget/Financial Management; and
- Assurances

1. Program Design

- a. Agency Mission: A brief description of the sub-grantee's mission. This statement includes a combination of basic assumptions about poverty causes and the sub-grantee's anti-poverty strategies to address these problems.
- b. FY 2016 Community Assessment: An assessment of community needs and strengths, involving the identification and ranking of poverty-related problems and existing community assets to address problems. It also involves the identification and prioritization of program strategies to address these problems.

2. Completed FY 2016 ROMA Implementation Plan

Since 2001, the Community Services Block Grant Act has required all CSBG eligible entities to participate in the Results-Oriented Management and Accountability (ROMA) system, and the State Office of Economic Opportunity expects Vermont's Community Action Agencies to be fully and actively engaged in the five-stage cyclical ROMA process of: Assessment; Planning; Implementation; Achievement of Results; and Evaluation. To be effective, this must be reinforced at all levels of the organization, including the board of directors. This strategic approach ensures that Community

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Action Agencies:

- I. have a complete and current understanding of the type and scope of poverty problems in their local communities;
- II. plan their programming and initiatives to address those needs identified and can select metrics against which program effectiveness will later be tested as well as targets and benchmarks;
- III. operate programs that make full and strategic use of appropriate resources;
- IV. achieve, measure, and report on results in the form of progress made towards performance indicators and the national poverty goals; and
- V. can evaluate overall program effectiveness by analyzing data and comparing against targets and/or benchmarks.

The ROMA Implementation Plan is a management tool which encapsulates all five stages of the ROMA cycle. It provides for the planning; implementation; achievement of results; and evaluation sections of the agency's efforts toward each of the six National Goals during a given program year. Further, the data reported during the year feed into future community assessments, beginning the next ROMA cycle. The electronic document that the State of Vermont Office of Economic Opportunity uses for ROMA planning and reporting comports with the national template, identifies strategies to meet the national goals and utilizes outcome measures and performance indicators to measure progress toward those goals. New this year, the Vermont Office of Economic Opportunity will incorporate proposed changes to the National Performance Indicators that are expected to be fully implemented nationally in FY 2016.

3. Management and Administration

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

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4. Budget/Financial Management

a. Budget: While the level of funding is uncertain at this time, we are operating under the assumption of level funding from FFY 2014 *i.e.* \$3,517,270 for FY 2016 CSBG. The agency should develop a line item budget that reflects the CSBG contribution to operating programs based on the number specified in Section V, A, 2.

b. Financial Management: This narrative section contains a description of the mechanisms developed to assure compliance with Federal standards.

5. Assurances.

Responses by the Community Action Agency to the Request for Work Plan will include a signed list of Assurances which will delineate all necessary assurances relative to activities undertaken and the expenditures incurred with funds provided under the CSBG Act.

D. REPORTING REQUIREMENTS

Data collection involves the collection of information on; unduplicated number of persons served, number of households served, various demographic information, etc. that act as indicators of progress being made on various poverty programs and management functions. These data collection systems must be capable of providing all necessary data to this office.

Outcome measures and performance indicators are required by the Office of Community Services (OCS) and are now part of the CSBG statute. The required outcome measures and indicators were agreed upon between the state and the five Community Action Agencies. Additional agency-specific measures are encouraged.

Monitoring of the agency's operations involves evaluating the success made toward the National goals and the satisfaction of State requirements concerning management activities.

E. PROCESS

The agency's proposal will not be considered unless it complies with all requirements listed in this request. The acceptable proposal submitted will be negotiated by the staff at the State Office of Economic Opportunity. The purpose of the negotiations is to arrive at a mutually agreed upon approach to meeting the requirements of the CSBG Act in furthering its goals and purpose.

Community Services Block Grant

Successful negotiations will result in the award of a grant to be entered into between the State and the Community Action Agency for the provision of services under the CSBG.

F. GENERAL INSTRUCTIONS

1. General Information: Section I (this section) is for information and assistance in preparing the work plan proposal.
2. Instructions for CSBG Work Plan: Sections II through V contain the specific instructions for completing the work plan proposals. The responses to these sections will comprise the actual work plan narrative and budget. Sections VI through IX contain attachments to be included in the work plan proposals.
3. Assembly of Application: Work Plan sections are listed below and should be specifically marked within the body of the proposal. Sections should be numbered using the following pagination format in the upper right corner of the document page:

Example: Agency Name, Date
 Section XXX
 Page X of X

Please include a list of attachments. To facilitate review and processing of the application, please assemble the materials as follows:

- Cover letter: Submit with the application and include the name(s) of the person to be contacted to answer questions and who will be negotiating the proposal.
- Section 1: Program Design
- Section 2: ROMA Implementation Plan (*submitted electronically in Excel*)
- Section 3: Management/Administration
- Section 4: Budget & Monthly Expenditure Plan (*submitted electronically in Excel*)
- Section 5: Financial Management Plan

Attachments:

- List of Attachments
- Signed Assurances (*Document provided – needs signature*)
- Reporting Requirements (*Document provided*)

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- Allowable Activities (*Document provided*)
- Definitions and Conditions (*Document provided*)
- Board Roster
- Agency By-Laws
- Job Descriptions for all positions funded in whole or in part with CSBG funds
- Indirect Cost Rate Agreement (if applicable)
- Community Assessment or Strategic Planning Documents
- Other Attachments (please specify in List)

DUE DATES

Proposals must be received electronically on or before August 28, 2015:

Sarah Phillips, State Office of Economic Opportunity
sarah.phillips@state.vt.us

On or before September 7, 2015, the proposal will be reviewed by the Office of Economic Opportunity and on or before September 14, 2015 the Community Action Agency will meet with State Office of Economic Opportunity staff (if necessary) to review the proposal, suggest changes or make any other recommendations in order to fully understand the proposal and its goals.

All proposals will be either granted or denied by October 1, 2015. The award of funds is contingent upon a Congressional appropriation to operate the program.

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II. PROGRAM DESIGN

(NOTE: Submitted as Section 1)

A. Agency Mission

Provide a brief description of the agency's mission. This section should include the mission statement as well as a combination of basic assumptions about poverty causes and the agency's anti-poverty strategies to address these problems within the scope of the CSBG Act. The section should contain specific statements which provide information regarding:

1. An identification of the agency's target population.
2. The agency's identification of the causes of the problems with which the target population is confronted.
3. The strategies to be used to combat the particular causes.
4. The attributes you perceive to be inherent to those strategies which make them particularly well suited to the task.

B. FY 2016 Community Assessment

The community assessment involves the identification of the needs and strengths of the low income population and communities served. It involves the identification of strategies, which build on community strengths, to address these needs and issues and the CSBG Act poverty problem as identified in the CSBG Act. Because of the many and diverse community and municipal groups that are collecting data for various community/needs assessments; we are asking that you utilize those in your proposal, to the extent possible, rather than undertaking an in depth analysis on your own for the sole purpose of this proposal, unless your Agency has undergone strategic planning efforts that are more relevant to this proposal. In either case, please include the most recent community assessment or strategic planning documents, relative to your service area, that drives your plan.

Describe the process used to apply the needs and strengths, as identified in the community assessment, to the development of your plan to address poverty problems (below) within the six National Goals. The definition of poverty problems that will be used in the community assessment and work plan are based on the CSBG Act as amended 2000. The poverty areas identified in the law are:

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- I. Unemployment/Underemployment
- II. Inadequate Education
- III. Use of Available Income/Lack of Income
- IV. Inadequate Housing
- V. Inability to Meet Emergency Needs
- VI. Remove Obstacles and Solve Problems which block the Achievement of Self Sufficiency
- VII. Achieve Greater Participation in the Affairs of the Community
- VIII. Ineffective/Inefficient use of Available Programs
- IX. Starvation/Malnutrition

Take special attention to describe how you will do the following:

- X. Coordinate and Establish Linkages between governmental and other social services programs to ensure the effective delivery of such services to low income individuals: and
- XI. Encourage the use of entities in the Private Sector of the community in efforts to ameliorate poverty in the community.

Within this section, please identify any ways you will use funds to support innovative community and neighborhood-based initiatives relative to the purposes of CSBG.

III. FY 2016 ROMA IMPLEMENTATION PLAN

(NOTE: Submitted as Section 2, in the excel template provided)

With a completed community assessment, the development of the ROMA Implementation Plan is the next step. The poverty areas have been identified and developed for agency action. The ROMA Implementation Plan will be the implementation schedule/plan for addressing the concerns in this section.

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The ROMA Implementation Plan is a comprehensive management plan which provides for the implementation of the Six National Anti-Poverty Goals within a broad framework of outcome measures and National Performance Indicators. The ROMA Implementation Plan involves three subsections:

- **Indicators:** A selection of indicators -- from the National Performance Indicators and any “agency-specific” indicators -- beyond the minimum required and agreed-upon Statewide Indicators (in blue). The Community Action Agency will continue to report on these indicators quarterly during the program year.
- **Targets:** The setting of annual performance targets. Please set these targets for ALL indicators that the agency will report on during the program year.
- **Programs:** A list of agency programs which will contribute data towards each Indicator during the program year. Please include on the supplemental “notes” tabs of the reporting spreadsheet.

Vermont’s eligible entities report quarterly outcome data to the Vermont Office of Economic Opportunity. Each entity reports on a minimum number of “common” indicators agreed upon by the State Office of Economic Opportunity and the Community Action Agencies. In addition, agencies choose additional performance indicators from the national list, and develop agency-specific indicators consistent with the Community Services Block Grant. Additional and agency-specific outcome measures will be identified by each eligible entity as part of their proposed Work Plan.

The State Office of Economic Opportunity will send an electronic template of the FY 2016 National Performance Indicators to all eligible entities in Vermont with the Request for Work Plan. Eligible entities will complete the template and return electronically to the State Office of Economic Opportunity by the Request for Work Plan due date as part of their proposed CSBG Work Plan. Each quarter, the Community Action Agency will submit their updated cumulative year-to-date data to the State Office of Economic Opportunity. These data will be aggregated by the Office of Economic Opportunity into a statewide report.

****Note:** The NPI template on the following pages includes 2 parts – Part 1 is required based on Vermont’s adoption of new national performance indicators. Part 2 remains as in previous years. In Part 2, agencies will report on “common indicators” in blue and select additional performance indicators as appropriate. ******

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PART 1

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Community Action National Performance		FFY		Agency Reporting:			Reporting Period:	
GOAL 6		People with low incomes, especially vulnerable populations, become more stable, or maintain stability.						
OUTCOME		People with low incomes who receive single or short-term services become more stable.						
	# of Households Seeking Assistance	# of Households Receiving Assistance	% of seekers that were assisted	# of Individuals Receiving Assistance	Of those households receiving assistance, the # who reported that they have become more stable due to assistance received.	# of Households achieving outcome	% of Households	PROGRAM(S) REPORTING
6.2 A-K	Individuals/households received assistance in a crisis or disaster situation (unduplicated)		#DIV/0!			TARGET %:	#DIV/0!	
	Emergency Food		#DIV/0!					
	Emergency fuel or utility payments (LIHEAP or other public or private sources)		#DIV/0!					
	Emergency rent or mortgage assistance (incl security deposits, etc.)		#DIV/0!					
	Emergency temporary shelter		#DIV/0!					
	Disaster Relief		#DIV/0!					
	Other emergency assistance		#DIV/0!					
OUTCOME	Vulnerable populations achieve or maintain improved status or conditions.							
				# of Children Enrolled	Of those children who participated in early childhood programs, the number who increase school readiness. (unduplicated)	# of Children achieving outcome	% of Children	PROGRAM(S) REPORTING
6.3 A-D	Children participated in early childhood programs (unduplicated)					TARGET %:	#DIV/0!	
					Infants and children obtained age-appropriate immunizations, medical and dental care		#DIV/0!	
					Infant and child health and physical development improved as a result of adequate nutrition		#DIV/0!	
					Children participated in preschool activities and developed school readiness skills		#DIV/0!	
					Children participated in preschool activities and are developmentally ready to enter Kindergarten or 1st Grade		#DIV/0!	

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GOAL 1 People with low incomes become more self-sufficient.						
OUTCOME	# of households enrolled in program	Of those participating, Households moved up on the FPG scale.	# of households achieving outcome	% of Households	POVERTY PROBLEM ADDRESSED	PROGRAM(S) REPORTING
		Households participate in programs to become more self-sufficient.	TARGET %:	#DIV/0!		
		Households reported a decrease in reliance on cash assistance or public benefits (because they are able to meet family needs without these supports).				
			TARGET %:	#DIV/0!		
OUTCOME People with low incomes improve their status or quality of life in one of the following:						
EMPLOYMENT	# of individuals enrolled in program	Of those enrolled, Individuals who were unemployed obtain a job or become self-employed.	# of individuals achieving outcome	% of Individuals	POVERTY PROBLEM ADDRESSED	PROGRAM(S) REPORTING
1.1a		Unemployed individuals receive services to assist them in obtaining employment (incl self-employment).		#DIV/0!		
		Underemployed individuals who received services to assist them in obtaining employment (incl self-employment).		#DIV/0!		
			TARGET %:	#DIV/0!		
EDUCATION & TRAINING	# of individuals enrolled in program	Of those enrolled, Individuals obtain skills/competencies required for employment.	# of individuals achieving outcome	% of Individuals	POVERTY PROBLEM ADDRESSED	PROGRAM(S) REPORTING
1.2a		Individuals participate in employment related training programs.		#DIV/0!		
			TARGET %:	#DIV/0!		

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E MANAGEMENT & ASSET DEVELOPMENT		# of households enrolled in program	Of those enrolled,	# of households achieving outcome	% of households	Aggregate \$ Amount	POVERTY PROBLEM ADDRESSED	PROGRAM(S) REPORTING
	Households participate in a tax preparation program.		Households qualified for any type of federal or state tax credit and the expected aggregate dollar amount of credits.		#DIV/0!			
		# of individuals enrolled in program	Of those enrolled,	# of individuals achieving outcome		Aggregate \$ Amount		
	Individuals participated in programs related to asset development.		Individuals opened an Individual Development Account or other savings account.		#DIV/0!	n/a		
			Individuals increased savings.		#DIV/0!			
			Individuals acquire an asset with IDA or other savings.	TARGET %:			POVERTY PROBLEM ADDRESSED	PROGRAM(S) REPORTING
			Capitalize a small business	0	#DIV/0!			
			Pursue post-secondary education					
			Purchase a home					
			Purchase other asset					
		# of households enrolled in program	Of those enrolled,	# of households achieving outcome	% of households			
	Homeless or near homeless households receive services to meet a housing need.		Of those households, homeless or near homeless households obtained or maintained safe and affordable housing. (NOT temporary shelter)					
			Of those households who obtained or maintained safe and affordable housing (above), the number of households who remained stable housed for 90 days.	TARGET %:	#DIV/0!			
				TARGET %:	70%			
		# of individuals enrolled in program	Of those enrolled,	# of individuals achieving outcome	% of individuals			
	Individuals received services to meet a transportation need.		Individuals obtained access to reliable transportation and/or driver's license.		#DIV/0!			
				TARGET %:				
		# of households enrolled in program	Of those enrolled,	# of households achieving outcome	% of households			
	Households received assistance to secure health care insurance.		Households secured health care insurance.		#DIV/0!			
				TARGET %:				

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Goal 1: Low-income people become more self-sufficient.

National Performance Indicator 1.1	I.) Number of Participants Enrolled in Program(s)	II.) Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	III.) Number of Participants Achieving Outcome in Reporting Period (Actual)	IV.) Percentage Achieving Outcome in Reporting Period [III / II = IV]
Employment	(#)	(#)	(#)	(%)
The number and percentage of low-income participants who get a job or become self-employed, as a result of Community Action Assistance, as measured by <u>one or more</u> of the following:				
A. Unemployed and obtained a job				#DIV/0!
B. Employed and maintained a job for at least 90 days				#DIV/0!
C. Employed and obtained an increase in employment income and/or benefits				#DIV/0!
D. Achieved "living wage" employment and/or benefits				#DIV/0!
<i>In the rows below, please include any additional indicators that were not captured above.</i>				
Low income people became self-employed				#DIV/0!
				#DIV/0!

National Performance Indicator 1.2	I.) Number of Participants Enrolled in Program(s)	II.) Number of Participants Expected to Achieve Outcome in Reporting Period	III.) Number of Participants Achieving Outcome in Reporting Period
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 <u>one or more</u> of the following:			
A. Obtained skills/competencies required for employment			
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			
E. Obtained care for child or other dependant			
F. Obtained access to reliable transportation and/or driver's license			
G. Obtained health care services for themselves or family member			
H. Obtained safe and affordable housing			
I. Obtained food assistance			
J. Obtained non-emergency LIHEAP energy assistance			
K. Obtained non-emergency WX energy assistance			
L. Obtained other non-emergency energy assistance (State/local/private energy programs. Do Not Include LIHEAP or WX)			
<i>In the rows below, please include any additional indicators that were not captured above.</i>			

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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 <u>one or more</u> of the following:		I.) Number of Participants Enrolled in Program(s)		II.) Number of Participants Expected to Achieve Outcome in Reporting Period (Target)		III.) Number of Participants Achieving Outcome in Reporting Period (Actual)	
		(#)		(#)		(#)	
				IV.) Percentage Achieving Outcome in Reporting Period [III / II = IV]		V.) Aggregated Dollar Amounts (Payments, Credits, or Savings)	
				(%)		(\$)	
E N H A N C E M E N T	A. Number and percent of participants in tax preparation programs who qualified for any type of Federal or State tax credit and the expected aggregated dollar amount of credits					#DIV/0!	
	B. Number and percent of participants who obtained court-ordered child support payments and the expected annual aggregated dollar amount of payments					#DIV/0!	
	C. Number and percent of participants who were enrolled in telephone lifeline and/or energy discounts with the assistance of the agency and the expected aggregated dollar amount of savings					#DIV/0!	
<i>In the rows below, please include any additional indicators that were not captured above.</i>							
	4. The number and percent of participants that received tax <u>refunds</u> , and the expected aggregated dollar amount.					#DIV/0!	
	5. The number and percent of participants that received <u>renters rebates</u> , and the expected aggregated dollar amount.					#DIV/0!	
	6. The number and percents of participants accessing business capital, and the aggregated dollar value.					#DIV/0!	
	7. The number and percent of participants in asset-development programs who increased their financial skills as determined by follow-up or pre/post testing.					#DIV/0!	
	8. The number and percent of participants in asset-development programs who improved their credit scores.					#DIV/0!	
						#DIV/0!	

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	<u>National Performance Indicator 1.3 (Continued)</u>					
	Economic Asset Enhancement and Utilization	I.) Number of Participants Enrolled in Program(s)	II.) Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	III.) Number of Participants Achieving Outcome in Reporting Period (Actual)	IV.) Percentage Achieving Outcome in Reporting Period [III/ II = IV]	V.) Aggregated Dollar Amounts (Payments, Credits, or Savings)
		(#)	(#)	(#)	(%)	(\$)
U T I L I Z A T I O N	D. Number and percent of participants demonstrating ability to complete and maintain a budget for over 90 days				#DIV/0!	N/A
	E. Number and percent of participants opening an Individual Development Account (IDA) or other savings account				#DIV/0!	N/A
	F. Number and percent of participants who increased their savings through IDA or other savings accounts and the aggregated amount of savings				#DIV/0!	
	G. Number and percent of participants capitalizing a small business with accumulated IDA or other savings				#DIV/0!	
	H. Number and percent of participants pursuing post-secondary education with accumulated IDA or other savings				#DIV/0!	
	I. Number and percent of participants purchasing a home with accumulated IDA or other savings				#DIV/0!	
	J. Number and percent of participants purchasing other assets with accumulated IDA or other savings				#DIV/0!	
<i>In the rows below, please include any additional indicators that were not captured above.</i>						
					#DIV/0!	
					#DIV/0!	
					#DIV/0!	

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Goal 2: The conditions in which low-income people live are improved.

National Performance Indicator 2.1 Community Improvement and Revitalization	I.) Number of Projects or Initiatives	II.) Number of Opportunities and/or Community Resources Preserved or Increased
Increase in, or safeguarding of, threatened 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 <u>one or more</u> of the following:	(#)	(#)
A. Jobs created, or saved, from reduction or elimination in the community		
B. Accessible "living wage" jobs created, or saved, from reduction or elimination in the community		
C. Safe and affordable housing units created in the community		
D. Safe and affordable housing units in the community preserved or improved through construction, weatherization or rehabilitation achieved by Community Action activity or advocacy		
E. Accessible safe and affordable health care services/facilities for low-income people created, or saved from reduction or elimination		
F. Accessible safe and affordable child care or child development placement opportunities for low-income families created, or saved from reduction or elimination		
G. Accessible before-school and after-school program placement opportunities for low-income families created, or saved from reduction or elimination		
H. Accessible new or expanded transportation resources, or those that are saved from reduction or elimination, that are available to low-income people, including public or private transportation		
I. Accessible or increased educational and training placement opportunities, or those that are saved from reduction or elimination, that are available for low-income people in the community, including vocational, literacy, and life skill training, ABE/GED, and post secondary education		

In the rows below, please include any additional indicators that were not captured above.

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National Performance Indicator 2.2 Community Quality of Life and Assets	I.) Number of Program Initiatives or Advocacy Efforts	II.) Number of Community Assets, Services or Facilities Preserved or Increased
The quality of life and assets in low-income neighborhoods are improved by Community Action initiative or advocacy, as measured by <u>one or more</u> 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		
E. Increase in or preservation of neighborhood quality-of-life resources		

In the rows below, please include any additional indicators that were not captured above.

F. Increase in the availability of fresh, nutritious food through: subsidized garden plots; garden distribution or information initiative; or farmer's market coupon program.		

National Performance Indicator 2.3 Community Engagement	I.) Total Contribution by Community
The number of community members working with Community Action to improve conditions in the community.	(#)
A. Number of community members mobilized by Community Action	

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Goal 3: Low-income people own a stake in their community.

<u>National Performance Indicator 3.1</u>	I.) Total Number of Volunteer Hours
Community Enhancement through Maximum Feasible Participation	(#)
The number of volunteer hours donated to Community Action.	
A. Total number of volunteer hours donated by <u>low-income</u> individuals to Community Action (<i>This is ONLY the number of volunteer hours from individuals who are low-income</i>)	
<i>In the rows below, please include any additional indicators that were not captured above.</i>	

<u>National Performance Indicator 3.2</u>	I.) Number of Low-Income People
Community Empowerment through Maximum Feasible Participation	(#)
The number 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 <u>one or more</u> 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 home 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	
<i>In the rows below, please include any additional indicators that were not captured above.</i>	

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Goal 5: Agencies increase their capacity to achieve results.

National Performance Indicator 5.1 Agency Development	I.) Resources in Agency (#)
The number of human capital resources available to Community Action that increase agency capacity to achieve family and community outcomes, as measured by <u>one or more</u> of the following:	
A. Number of Certified Community Action Professionals	
B. Number of Nationally Certified ROMA Trainers	
C. Number of Family Development Certified Staff	
D. Number of Child Development Certified Staff	
E. Number of staff attending trainings	
F. Number of board members attending trainings	
G. Hours of staff in trainings	
H. Hours of board members in trainings	
In the rows below, please include any additional indicators that were not captured above. Please describe these measures in Goal 5 Notes.	

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Goal 4: Partnerships among supporters and providers of services to low-income people are achieved.		
National Performance Indicator 4.1	I.) Number of Organizations (#)	II.) Number of Partnerships (#)
Expanding Opportunities through Community-Wide Partnerships		
The number of organizations, both public and private, that Community Action actively works with to expand resources and opportunities in order to achieve family and community outcomes.		
A. Nonprofit		
B. Faith Based		
C. Local Government		
D. State Government		
E. Federal Government		
F. For-Profit Business or Corporation		
G. Consortiums/Collaboration		
H. Housing Consortiums/Collaboration		
I. School Districts		
J. Institutions of post secondary education/training		
K. Financial/Banking Institutions		
L. Health Service Institutions		
M. State wide associations or collaborations		
In the rows below, please add other types of partners with which your CAA has formed relationships that were not captured above. Please describe these partnerships in Goal 4 Notes.		
N. The total number of organizations and total number of partnerships CAAs work with to promote family and community outcomes (automatically calculates)	0	0

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Goal 6: Low-income people, especially vulnerable populations, achieve their potential by strengthening family and other supportive environments.

National Performance Indicator 6.1	I.) Number of Vulnerable Individuals Living Independently
Independent Living	
The number of vulnerable individuals receiving services from Community Action who maintain an independent living situation as a result of those services:	(#)
A. Senior Citizens (seniors can be reported twice, once under Senior Citizens and again if they are disabled under Individuals with Disabilities, ages 55-over)	
B. Individuals with Disabilities	
Ages: 0-17	
18-54	
55-over	
Age Unknown	
TOTAL Individuals with disabilities (automatically calculates)	0
<i>In the rows below, please include any additional indicators that were not captured above.</i>	

National Performance Indicator 6.2	I.) Number of Individuals Seeking Assistance	II.) Number of Individuals Receiving Assistance
Emergency Assistance		
The number of low-income individuals served by Community Action who sought emergency assistance and the number of those individuals for whom assistance was provided, including such services as:	(#)	(#)
A. Emergency Food		
B. Emergency fuel or utility payments funded by LIHEAP or other public and private funding sources		
C. Emergency Rent or Mortgage Assistance		
D. Emergency Car or Home Repair (i.e. structural, appliance, heating system, etc.)		
E. Emergency Temporary Shelter		
F. Emergency Medical Care		
G. Emergency Protection from Violence		
H. Emergency Legal Assistance		
I. Emergency Transportation		
J. Emergency Disaster Relief		
K. Emergency Clothing		
<i>In the rows below, please include any additional indicators that were not captured above.</i>		

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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 who achieve program goals, as measured by <u>one or more</u> of the following:		I.) Number of Participants Enrolled in Program(s)	II.) Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	III.) Number of Participants Achieving Outcome in Reporting Period (Actual)	IV.) Percentage Achieving Outcome in Reporting Period [III / II = IV]
		(#)	(#)	(#)	(%)
I N F A N T S & C H I L D R E N	A. Infants and children obtain age-appropriate immunizations, medical, and dental care				#DIV/0!
	B. Infant and child health and physical development are improved as a result of adequate nutrition				#DIV/0!
	C. Children participate in pre-school activities to develop school readiness skills				#DIV/0!
	D. Children who participate in pre-school activities are developmentally ready to enter Kindergarten or 1st Grade				#DIV/0!
Y O U T H	E. Youth improve health and physical development				#DIV/0!
	F. Youth improve social/emotional development				#DIV/0!
	G. Youth avoid risk-taking behavior for a defined period of time				#DIV/0!
	H. Youth have reduced involvement with criminal justice system				#DIV/0!
	I. Youth increase academic, athletic, or social skills for school success				#DIV/0!
A D U L T S	J. Parents and other adults learn and exhibit improved parenting skills				#DIV/0!
	K. Parents and other adults learn and exhibit improved family functioning skills				#DIV/0!
<i>In the rows below, please include any additional indicators that were not captured above.</i>					
					#DIV/0!

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<u>National Performance Indicator 6.4</u>		
Family Supports (Seniors, Disabled and Caregivers)		
Low-income people who are unable to work, especially seniors, adults with disabilities, and caregivers, for whom barriers to family stability are reduced or eliminated, as measured by <u>one or more</u> of the following:	I.) Number of Participants Enrolled in Program(s)	II.) Number of Participants Achieving Outcome in Reporting Period
	(#)	(#)
A. Enrolled children in before or after school programs		
B. Obtained care for child or other dependant		
C. Obtained access to reliable transportation and/or driver's license		
D. Obtained health care services for themselves or family member		
E. Obtained and/or maintained safe and affordable housing		
F. Obtained food assistance		
G. Obtained non-emergency LIHEAP energy assistance		
H. Obtained non-emergency WX energy assistance		
I. Obtained other non-emergency energy assistance (State/local/private energy programs. Do Not Include LIHEAP or WX)		

<u>National Performance Indicator 6.5</u>	
Service Counts	
The number of services provided to low-income individuals and/or families, as measured by <u>one or more</u> of the following:	I.) Number of Services
	(#)
A. Food Boxes	
B. Pounds of Food	
C. Units of Clothing	
D. Rides Provided (if your agency provides transportation)	
E. Information and Referral Calls	

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IV. MANAGEMENT AND ADMINISTRATION

(NOTE: Submitted as Section 3)

A. Board Operations

1. Describe the composition of your agency's board of directors (i.e., private sector, public sector, low-income representative) including total membership and number of representatives from each sector. Describe the manner in which representatives are selected.
2. Provide a board roster with: names, addresses and phone numbers of current members and indicate which sector each represent. Also include the dates of each board member's term of office. Indicate the current chairperson. Indicate each member's committee responsibilities.
3. Provide the bylaws.
4. Describe the board's function, frequency of meetings of the general assembly and frequency of committee meetings.

B. Organizational Structure:

Provide a detailed description of the agency's internal organizational structure, i.e. divisions, departments, units, as appropriate. Explain the function of each division and its staffing pattern.

C. Job Descriptions

Attach job descriptions for all positions funded in whole or in part with CSBG funds.

D. Operating Procedures

1. Describe the procedure your agency uses to identify eligible clients.
2. Provide a description of the methods your agency uses to control CSBG eligible applications, to control applications which are not CSBG eligible but, applicants who are eligible for other agency programs and how you control applications completed by applicants who are not eligible to receive service under any agency-sponsored program.
3. Describe your agency's policy with respect to those applicants who are members of minority populations.

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4. Describe the system your agency utilizes to ensure that client needs have been met.

E. Evaluation and Control Systems:

1. Provide a description of the system you will use to perform an ongoing evaluation of the effectiveness of programs and activities operated under the CSBG.
2. Describe how you use ROMA measures to evaluate the effectiveness of the Agency in meeting the national goals, including program and or board involvement and frequency of review.

V. BUDGET/FINANCIAL MANAGEMENT

A. Budget (*NOTE: Submitted as Section 4*)

Based on the following, prepare a line item budget for the planned expenditure of federal funds. This budget should total the figure below (IV,A,2) and should not include any anticipated agency carry-forward from the previous fiscal year.

1. General

In the absence of firm budget figures, we are proceeding on the assumption that the State's award will be level-funded at **\$3,340,193**. Allocations to Vermont's five Community Action Agencies have been developed by applying the State Office of Economic Opportunity allocation formula to the 90% statutory pass-through of **\$3,006,174**.

The budget developed for this proposal should be developed in such a way that if Congress significantly alters the level of funds, the agency can amend its work plan with the least amount of disruption to the provision of services as possible. Following are the Anticipated Grant Awards Amounts:

2. CSBG Allocations - Anticipated Award Amounts

BROC	\$569,386
Capstone	\$608,436
CVOEO	\$936,151
NEKCA	\$586,155
SEVCA	\$496,596

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3. Specific Budget Instructions

a. Cost Categories: The cost categories to be used in preparing your budget are Administration and Program Operations. The cost categories should be further divided into Personnel and Operating (all non personnel costs) components. **To facilitate desk reviews, these cost categories must remain consistent between Document C "Budget"; Document B "Monthly Expenditure Plan"; Document CSBG-0001 "invoice/financial statements"; and any proposed budget modification documents. Budget documents not submitted in this format may be rejected.**

b. Administration: No limitations are imposed with regard to amounts allocable for administrative expenses; however, administrative expenses should be maintained at the lowest level possible that will ensure the implementation of efficient operations.

c. Audit: The agency is to conduct its own audit of its CSBG funds in conformance with OMB Circular A-133. The estimated cost of the audit shall be a separate item within the budget.

d. Indirect Costs: Agencies that have an approved indirect cost rate must include a copy of the Indirect Cost Negotiation Agreement entered into with the cognizant federal agency.

B. Financial Management (*NOTE: Submitted as Section 5*)

To ensure the proper management of federal grant funds, the State requires the Community Action Agency to develop a financial management plan that adopts and assures compliance with the Vermont CSBG Uniform Requirements for Grants and Agreements with Nonprofit Organizations.

Also, provide a general description of your agency's finance department and identify key personnel and their responsibilities. Also describe the relationship between your agency's central administrative office and satellite/field offices, relative to financial transactions.

Describe the system of internal controls established with respect to the following areas of financial operations:

1. Cash Receipts: CSBG cash advances and other CSBG related receipts, if appropriate. Discuss the process for recording receipt, verifying relationship between check amount remittance voucher, timing of bank deposit, position responsible for making deposit, etc.

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2. Cash Payments: Provide a description of the process whereby payments for goods and services are initiated, including documentation required to make payment, positions authorized to sign checks and the number of signatures required to validate checks.

3. Bank Reconciliations: Describe the procedure utilized to compare cash recorded, per the accounting records, with cash reported by the bank. Note the frequency with which bank reconciliations are conducted and indicate the position responsible for ensuring the process is completed.

4. Payroll System: Describe the items of control (i.e., time sheets) and procedure utilized (i.e., supervisory review/signature) to ensure the validity and accuracy of payments under the payroll system.

VI. COMMUNITY ACTION AGENCY ASSURANCES

(Include signed page with submission)

1. that it will use funds granted as a result of the application to provide a range of services and activities having a measurable and potentially major impact on causes and effects of poverty in the area to be served;
2. that it will provide services and activities to remove obstacles and solve problems which block the achievement of self-sufficiency and other services and activities as appropriate to address identified causes and conditions of poverty;
3. that it will coordinate and establish linkages to assure the effective delivery of and coordination of CSBG services to low-income people and communities, and fill identified gaps in services through the provision of information, referrals, case management and follow-up (as required by the assurance under Section 676(b)(3) and (5) of the CSBG Act).
4. that it will coordinate the provision of employment and training activities through statewide and local WIOA workforce development systems (as required under Section 676(b)(5) of the CSBG Act).
5. that it will coordinate and form partnerships with other public and private resources and organizations, including faith-based organizations, charitable groups, and community organizations (as required under Section 676(b)(9) and (b)(3)(C) of the CSBG Act).
6. that it will use funds to support innovative community and neighborhood-based initiatives (as required under Section 676(b)(3)(D) of the CSBG Act).
7. that it 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 (as required under Section 676(b)(4) of the CSBG Act).
8. that the Community Action Agency meets the requirements of Section 675(c)(3) of the Act relating to board composition. It must provide as an addendum to the application a current list of board members with the groups, organizations or

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sectors they represent;

9. that it will not undertake any political activities prohibited by the Act with these funds including, but not limited to, transportation of voters to the polls, voter registration activity, partisan political activity, or lobbying the congress;
10. that it will coordinate its activities with emergency Energy Crisis programs operated in the community pursuant to the Low-Income Home Energy Assistance Program;
11. that it will ensure that financial management systems utilize the standards prescribed in the "Vermont CSBG Uniform Requirements for Grants and Agreements with Non-profit Organizations".
12. that it will ensure the cooperation of staff and availability of all records, pertaining to the CSBG, to representatives of the State Office of Economic Opportunity, the office of the State Auditor and Federal officials charged with monitoring the use of the funds provided;
13. that it will cooperate with Federal investigations undertaken in accordance with Section 679 of the Act;
14. that it will comply with the nondiscrimination provisions in Section 677 of the Act;
15. that it has adopted and implemented bylaws for itself and sub-grantee policies relative to travel, personnel and other areas as appropriate, consistent with Federal and State laws and regulations. The reimbursement rates for travel and related expenses will be set locally by the boards but may not exceed the State limits. Fiscal management policies and procedures must have been approved and be located in separate volume.

Signature, Executive Director _____

Date _____

Print Name _____

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VII. CSBG REPORTING REQUIREMENTS

(Include with submission)

<u>CSBG Report</u>	<u>Due Date</u>
CSBG-0001 Invoice/Financial Statement	Monthly, due at State Office of Economic Opportunity the 15th of the month following the report month.
CSBG-0002 Request for Cash Advance	Quarterly, due at State Office of Economic Opportunity the 15th of the month, following the report period.
Agency National Performance Indicators. Reporting on Agency progress made toward the six National Goals.	Quarterly, due at State Office of Economic Opportunity the 30th of the month, following the report period.
CSBG narrative highlighting agency programs or initiatives in format specified by NASCSP and the Vermont Office of Economic Opportunity.	Quarterly, due at State Office of Economic Opportunity the 30th of the month, following the report period.

The reporting system will start anew on October 1, 2015.

All CSBG clients will require new intakes or recertification to certify eligibility for FFY 2016.

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Attachment 2: Vermont CSBG Plan Addendum, FY 2016

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. Beginning in FY16, the organizational standards will be incorporated into the onsite review of each eligible entity.
- 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.
- All onsite reviews include an exit interview and an initial monitoring report to eligible entities within 45 days.
- Additionally, the State Office of Economic Opportunity conducts off-site (desk monitoring)

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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 (NASCSPP), 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

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affords the capability of off-site financial monitoring which can identify individual sub-grantee(s) or specific sub-grantee expense 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.

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, and Guidelines for Financial and Compliance Audits of Federally Assisted programs, and the OMB Super Circular.

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

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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.

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.

As appropriate, monitoring may also result in technical assistance plans negotiated between the eligible entity and the State Office. The existence of a technical assistance plan does not constitute a deficiency, finding or corrective action. Technical assistance may be offered with or without the existence of a deficiency.

USE, SUSPENSION OR TERMINATION OF FUNDS

All Vermont CSBG eligible entities are Community Action Agencies which received funding under the Act in the previous fiscal year. Only current CSBG eligible entities are recipients of the FY 16 Request for Work Plan grant package, and all funds provided (except for State administration and the Discretionary pool) for the CSBG 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.

The State will give special consideration to the designation of eligible entities 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

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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.

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 the State Plan 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.

In the event that the State elects to recapture and redistribute funds to an eligible entity through the entity's base 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 will redistribute recaptured funds to another 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)]

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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

Per Section 676(b)(8) of the CSBG Act, no eligible entity in the State that received funding in the previous fiscal year through a community services block grant made under this subtitle will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b).

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.

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.

If the State determines that for some substantiated reason 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.

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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 309I. 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 the CSBG Act.

Additionally, the State assures that it will meet the requirements of Section 678(C)(a) of the Act, including:

- (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.

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.

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CSBG BUDGET SUMMARY

<u>Allocation of Funds by Community Action Agency</u>	FFY '13	FFY '14	FFY '15	FFY '16
	(Actual)	(Actual)	(Estimated)	(Proposed)
BROC – Community Action in Southwestern Vermont	\$542,439	\$563,832	\$569,386	\$569,386
Capstone Community Action, Inc.	\$598,281	\$614,501	\$638,436	\$608,436
Champlain Valley Office of Economic Opportunity, Inc.	\$906,382	\$932,319	\$936,151	\$936,151
Northeast Kingdom Community Action, Inc.	\$558,208	\$580,437	\$586,155	\$586,155
Southeastern Vermont Community Action	<u>\$483,989</u>	<u>\$496,752</u>	<u>\$501,596</u>	<u>\$496,596</u>
Community Action Agency Total ¹	\$3,089,299	\$3,187,841	\$3,231,724	\$3,196,724
State Administration	\$155,903	\$175,864	\$177,595	\$177,595
Discretionary Grants	\$ 94,991	\$153,565	\$142,596	\$177,596
Total Federal Funds	\$3,340,193	\$3,517,270	\$3,551,915	\$3,551,915
FFY 2013	\$3,340,193			
FFY 2014		\$3,517,270		
FFY 2015			\$3,551,915	
FFY 2015				\$3,551,915

¹ Includes Discretionary and Base Awards