

**COMMUNITY SERVICES
BLOCK GRANT (CSBG)
Fiscal Year 2022 Only**

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 participants with low-income 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.

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

- 1.1. & 1.1a. One Year Plan covering Federal Fiscal Year 2022 (10/1/21-9/30/22)
- 1.2. 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.

Human Services Department

Vermont Agency of Human Services

Authorized official: Sarah Phillips, Director, Office of Economic Opportunity
280 State Drive, Waterbury, Vermont 05671
(802) 585-9218
Sarah.phillips@vermont.gov
<http://humanservices.vermont.gov/>

- 1.3. **Designation Letter:** State's official CSBG designation letter and AHS designation letter are attached.
- 1.4. 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, Director, Office of Economic Opportunity
280 State Drive, Waterbury, Vermont, 05671-1050
(802) 585-9218
Sarah.phillips@vermont.gov
<http://dcf.vermont.gov/oeo/>

- 1.5. State Community Action Association. The Vermont Community Action Partnership is the State Association composed of the five eligible entities. SEVCA serves as the fiscal agent, although there is no dedicated staffing for the State Association.

Vermont Community Action Partnership

c/o Champlain Valley Office of Economic Opportunity

Jan Demers
255 S. Champlain Street, Burlington, VT 05401
(802) 777-1954
jandemers@cvoeo.org
www.cvoeo.org

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>
- 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 health and 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 participants with low-income, 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;
 - 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 individuals with low-income;
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 the use of full cycle performance management to document and enhance all programs.

Strategies: The Office will continue to support training and technical assistance to eligible entities by coordinating quarterly Results-Oriented Management and Accountability

(ROMA) Community of Practice meetings to improve reporting consistency, offering ROMA training for VT staff based on assessment of needs, and helping agencies use CSBG reports to reflect on programs and potential changes in practice.

2. Streamline CSBG Administration

Strategies: The Office will continue to offer and provide technical assistance to each eligible entity by finalizing CSBG state manual to summarize all requirements for eligible entities and identify changes to the CSBG onsite monitoring process to reduce administrative burden.

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

3.3a. Analysis of:

- X State Performance Indicators and/or National Performance Indicators (NPIs)
- X U.S. Census data
- X State performance management data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)
- X monitoring visits/assessments

3.3b. Analysis of local-level tools:

- X Eligible entity community needs assessments
- X Eligible entity community action plans
- X Public hearings/workshops

3.3c. Consultation with:

- X Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)
- X State community action association
- X National Association for State Community Services Programs (NASCSPP)
Regional Performance Innovation Consortium (RPIC)
- X Federal CSBG office
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 content with the Vermont Community Action Partnership (State Association) at the

State Association meeting, which includes the Executive Directors from each of Vermont's five Community Action Agencies. A copy of the plan is sent to each eligible entity for feedback. The eligible entities were also notified of the State Plan public hearing on July 20, 2021. (Update with statement that indicates if comments were received or not)

3.4b. Performance Management Adjustment:

How has the State adjusted State Plan development procedures under this State Plan, as compared to past plans, in order

- 1) to encourage eligible entity participation and
- 2) to ensure the State Plan reflects input from eligible entities?

Any adjustment should be based on the State's analysis of past performance in these areas, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any adjustments, provide further detail.

Last cycle, the State discussed the State Plan development procedures with the eligible entities at a State Association meeting, including the timeline determined by the OCS information memoranda on the State application of funds (July) and the joint block grant public hearing (July). The State discussed the State Plan Process with the State Association at a spring meeting and offered to connect individually with any Executive Director interested in learning more about the process. The State then later discussed the State Plan draft with the State Association and requested comments.

(Update with statement that indicates if comments were received or not)

3.5. Eligible Entity Overall Satisfaction: 87

SECTION 4: CSBG Hearing Requirements

- 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.

To be completed post-plan development.

- 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.

The notice for the public hearing was placed in multiple local daily papers. Eligible entities, limited purpose sub-grantees and other interested parties are invited to attend the public and legislative hearings which review this plan. In addition, copies of the plan summary were and are available for public inspection from the Vermont Agency of Human Services website. The Community Action Agencies were notified of the public hearing at their meeting on June 4, 2021. A draft plan was reviewed at the July 9, 2021 meeting. A draft was shared, along with notice of the public hearing with the broader network of providers via email on ----.

- 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
7/20/21	Waterbury, VT	Public Hearing

The state of Vermont has historically combined its public and legislative hearings. The Joint Fiscal Office/Committee Chairs were invited to the public hearing. Our Commissioner testified on the FY22 budget in House Appropriations on February 4, 2021 and in Senate Appropriations on February 9, 2021. Additional testimony on the budget was presented to the House Human Services Committee February 4, 2021.

- 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

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:

- 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?

- Contracts with eligible entities

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

- Self-assessment (with validation by the State or State-authorized third party)
 Regular, on-site CSBG monitoring

6.4a. Describe the assessment process.

The State Office of Economic Opportunity will annually distribute an Organizational Standard Submission Sheet to each agency. Agencies will self-assess and submit the completed tool along with documentation by July 30th of each year. This will provide the State Office the opportunity to review and incorporate the results into the CSBG State Plan. The State Office of Economic Opportunity will review and validate the assessment within 60 calendar days.

Every three years, the State Office of Economic Opportunity will conduct its onsite monitoring of eligible entities. During regular onsite monitoring, staff of the State Office of Economic Opportunity will review documentation onsite and write up a report of their findings. The State Office of Economic Opportunity meets monthly in person with the Vermont Community Action Partnership and will use this time as an opportunity to provide feedback to the network and jointly plan technical assistance and training. Each eligible entity provides quarterly CSBG NPI reports to the State Office. Entities with ongoing technical assistance plans for organizational standards will submit updates, along with supporting documentation, quarterly at the time of NPI report submission.

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.

6.6. Performance Target: What percentage of eligible entities in the State does the State expect will meet all the State-adopted organizational standards in the next year?

100%

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 ensure 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 2021 Community Action Agencies distributions as the new base levels for funding.

In any year where Vermont receives an increase or decrease in core CSBG funding available to eligible entities—above or below the FY 2017 base level of \$3,305,030—the amount allocated to

each eligible entity shall be adjusted with a corresponding percentage increase or decrease in funding. In this way, a 5% increase in Vermont’s CSBG award would result in a 5% increase to each eligible entities’ allocation for that year; likewise in the experience of a decrease to Vermont’s CSBG award.

In FY 2018, the State Office of Economic Opportunity reviewed the formula allocation in partnership with eligible entities, and decided to postpone any amendment to the formula until the next 10-year census data is available for review and analysis.

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. Formula Description

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 \$
BROC – Community Action in Southwestern Vermont	\$615,175
Capstone Community Action	\$657,826
Champlain Valley Office of Economic Opportunity	\$1,012,807
Northeast Kingdom Community Action	\$632,270

Planned CSBG 90 Percent Funds	
Southeastern Vermont Community Action	\$536,253
Total	\$3,454,331

- 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.” 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.

A cash advance in an amount sufficient to fund one month’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 monthly 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 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.

- 7.5. Performance Management Adjustment:** How is the State improving grant and/or contract administration procedures under this State Plan as compared to past plans? Any improvements should be based on analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing.

The State is working on a consolidation of existing policies and procedures into a single document which it will distribute to eligible entities. The State anticipates that this may reveal the need for revisions or additions to administrative procedures. The State Office of Economic Opportunity regularly solicits and receives feedback from eligible entities on grant administration procedures. The State Office of Economic Opportunity will continue to work with eligible entities to improve grant administration procedures within its purview, to relay feedback to respective units within State government, and to connect eligible entities directly with those units, as appropriate.

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 Equivalents (FTEs) will be funded with CSBG funds under this State Plan?

Approximately 1.5 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.

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	30%	These planned services/activities are described in State Plan item 8.1

b. Coordination of State-operated programs and/or local programs	20%	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	0%	n/a
f. Innovative programs/activities by eligible entities or other neighborhood groups	20%	Other innovative activities at eligible entities or other community-based nonprofits, such as those addressing food security/systems, supporting adult education, or promising practices to address homelessness.
g. State charity tax credits	0%	n/a
h. Other activities, specify	30%	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.

7.11. Performance Management Adjustment: How is the State adjusting the use of remainder/discretionary funds under this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing.

The State will continue to make remainder funds available to eligible entities and the Vermont Community Action Partnership (state association) and to work with the association and entities to plan and implement training and technical assistance.

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: community-level work
<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 	<p>Other: promising and evidence-based practices in ending poverty</p> <p>Other: cross sector skills or general nonprofit management skills; e.g., leadership development, cultural competency, strategic communication, collective impact, leading change, board development, compassion fatigue, working with different populations, etc.</p>

8.1a. The planned budget for the training and technical assistance plan (as indicated in the Remainder/Discretionary Funds table in item 7.9): 20%

8.1b. Training and technical assistance collaboration: Describe how the state will collaborate with the state association and other stakeholders in the planning and delivery of training and technical assistance.

The State will continue to work with the association and entities to plan and implement training and technical assistance. The Office of Economic Opportunity is in weekly, if not daily, communication with staff and leadership of Eligible Entities and meets monthly with the State Association. Training is always a topic of conversation during meetings, calls, and site visits. OEO actively participates in and collaborate on the planning and creation of the joint T&TA plan with the Vermont Community Action Partnership.

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?

The State is currently in review of the annual assessment of organizational standards for each agency, and there are no open Quality Improvement Plans or agencies with unmet organizational standards have resolved issues or have Technical Assistance Plans in place.

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

The eligible entities in Vermont have made excellent progress in meeting the Organizational Standards and are building these requirements into their ongoing management practices. OEO offers quarterly training at VCAP meetings on specific organizational standards that are of common interest or challenge to the entities. Topics have included customer satisfaction, employee performance evaluations, data systems, and more. Resource and peer sharing have been very effective at helping organization fully implement the standards. OEO provides additional technical assistance 1:1 with eligible entities as needed.

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.)

- X CSBG eligible entities: (if checked, provide the expected number of CSBG eligible entities to receive funds) one
- X State Community Action association

- X National technical assistance provider(s)
- X Individual consultant(s)
- X Other: The State will provide some Training and Technical Assistance directly.

8.4. Performance Management Adjustment: How is the State adjusting the training and technical assistance plan under this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing.

Based on the analysis of past performance and feedback from eligible entities (positive), the State has not made significant adjustments to the training and technical assistance plan under this State Plan as compared to past plans. An example of ongoing adjustment, is a joint training presented by the Vermont Community Action Partnership (state association) and the State focused on the organizational standards in February 2021. This is an example of the State providing Training and Technical Assistance directly. This is not considered to be a substantial adjustment to the State's approach, but rather an example of the way that ongoing partnership approach supports new opportunities to meet training and technical assistance needs of eligible entities.

The State will continue to look at eligible entities' performance on the organizational standards and monitoring reports to adjust specific training and technical assistance activities for the year. The State will continue to work closely with eligible entities and the Vermont Community Action Partnership (state association) to develop and implement joint training and/or technical assistance activities.

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 people and communities with low-income 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.

- 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. The State Office is also now participating in Vermont's Climate Council.

As part of the COVID-19 recovery effort, the State Office participates on various task forces and working groups and promotes communication among eligible entities and other State and local service providers. The State Office was represented on the State Emergency Operations Center (SEOC) and closely worked over the past year with Vermont Emergency Management (VEM) and the Vermont Department of Health (VDH). Although, the SEOC has been demobilized, response and recovery efforts continue in coordination with VEM and VDH, in particular, with regards to supporting Vermonters with low incomes and those experiencing challenges such as food insecurity and homelessness to access the services provided by eligible entities. The State Office

also will maintain a strong relationship with the Vermont Department of Health through its participation in the CDC rural health equity program.

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 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 Continua of Care to assure the effective delivery of CSBG services to people and communities with low-income, 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 as well as the response to COVID-19

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. The FY 2022 Request for Work Plan package is submitted as an attachment to the State Plan.

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, 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. The State has included CSBG employment and training activities as part of a WIOA Combined State Plan.

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 directly to Community Action Agencies to provide administer crisis fuel services and 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.

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 coordination at the state and local level, community needs, etc.	Monthly	Meetings/ Presentation
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 “ROMA” Workgroup	Quarterly	In-person & 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.

9.11. Performance Management Adjustment: How is the State adjusting the Communication Plan in this State Plan as compared to past plans? Any adjustment should be based on

the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing.

Based on feedback from eligible entities, the State is not adjusting its communication plan and will continue to maintain strong communication with eligible entities.

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	On Site	July, 2022	July, 2019
Capstone Community Action	On Site	July, 2022	July, 2019
Champlain Valley Office of Economic Opportunity	On Site	July, 2022	July, 2019
Northeast Kingdom Community Action	On Site	July, 2022	July, 2019
Southeastern Vermont Community Action	On Site	July, 2022	July, 2019

- 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 at this time.

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?

When an eligible entity is on a Quality Improvement Plan as approved by the State Office of Economic Opportunity, the State Office will notify the Office of Community Services regional contact in writing 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>

10.8b. If no, describe state procedures for designation of new entities.

n/a

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

No.

10.9a. If yes, provide the citation(s) of the law and/or regulation.

10.9b. If no, describe State procedures for termination of new eligible entities and how the procedures were made available to eligible entities and the public.

Please see attached Vermont CSBG Plan Addendum. Although Vermont's CSBG Plan Addendum is not part of the OCS Model State Plan, it is a part of Vermont's State CSBG Plan submitted for public review/public hearing.

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.

10.10a. If yes, provide the citation(s) of the law and/or regulation.

10.10b. If no, describe State procedures for re-designation of existing eligible entities and how the procedures were made available to eligible entities and the public.

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 Uniform Guidance. All single audits are reviewed by the State Office and the Internal Audit Group at the Agency of Human Services.

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.

10.14. Performance Management Adjustment: How is the State adjusting monitoring procedures in this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing.

The State is not making any significant adjustments to monitoring procedures at this time. The State has streamlined the Organizational Standard Assessment process based on feedback from Eligible Entities and our own internal review.

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. Board rosters must be submitted quarterly and note any changes and the date of vacancies.

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-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.

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

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 ("ROMA") 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 (Mission, Community Assessment); ROMA Implementation Plan (Indicators, Targets, Strategies/Services); 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 grant agreements 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.

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.

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 –
 - (I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and
 - (II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

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.

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 follow-up 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

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.”

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.

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.

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.

COMMUNITY SERVICES BLOCK GRANT

FY 2022 REQUEST FOR WORK PLAN

FOR THE PERIOD

OCTOBER 1, 2021 - SEPTEMBER 30, 2022

STATE OFFICE OF ECONOMIC OPPORTUNITY

280 STATE DRIVE

HC 1 NORTH

WATERBURY, VERMONT

05671-1050



INSERT NEW DRAFT

DRAFT

APPENDIX 1: CSBG DEFINITIONS AND CONDITIONS

A. General Conditions

Only those persons who meet the criterion of eligibility established under Section 673 (2) of the CSBG Act – that is, whose income does not exceed **125%** of the official poverty line established by the Secretary of Health and Human Services – shall be the recipients of services provided with funds under this grant.

B. Special Conditions

1. Funds budgeted as “Director’s Special Discretionary Fund” are provided for emergency purposes, for the Executive Director to assist low-income persons to obtain emergency assistance through loans or grants to meet immediate and urgent individual and family needs, as provided under Section 675 (c) (1) (B) (iii) of the Community Services Block Grant Act.
2. Title for all non-expendable personal property (unit acquisition cost of \$5,000 or more and having a useful life exceeding one year or more) and non-expendable property with a cost of \$5,000 or more, vests in the State. The purchase of all non-expendable personal property shall require the prior approval of the State; the completion and the submittal of a CSBG Property Record Card is required within 30 days after delivery; and the inclusion of the item(s) in the Grantee’s CSBG Fixed Assets Account.
3. Adequate documentation verifying client eligibility must be maintained by the Grantee.
4. The complete minutes from all Grantee’s board meetings shall be transmitted to the State within 30 days of the board meeting.

Vermont CSBG Plan Addendum, FY 2022

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 have been 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) 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 Three National Goals, and a CSBG narrative in the format proscribed by the National Association for State Community Service Programs (NASCS), will be submitted by each Community Action Agency to the State Office of Economic Opportunity quarterly.

b. Financial

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

2. Utilization of Required Reports

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

5. State Responsibilities and Services

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

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

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

Written reports detailing monitoring findings - both positive and negative - will be submitted to the Director of the Office of Economic Opportunity. The Director 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 20 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 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 month'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 monthly 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 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)]

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.

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 '19	FFY '20	FFY '21	FFY '22
	(Actual)	(Actual)	(Actual)	(Projected)
BROC – Community Action in Southwestern Vermont	\$597,704	\$617,383	\$615,175	\$615,175
Capstone Community Action, Inc.	\$639,143	\$660,186	\$657,826	\$657,826
Champlain Valley Office of Economic Opportunity, Inc.	\$984,042	\$1,016,440	\$1,012,807	\$1,012,807
Northeast Kingdom Community Action, Inc.	\$614,314	\$634,539	\$632,270	\$632,270
Southeastern Vermont Community Action	<u>\$521,024</u>	<u>\$538,177</u>	<u>\$536,253</u>	<u>\$536,253</u>
Community Action Agency Total ¹	\$3,356,227	\$3,466,725	\$3,454,331	\$3,454,331
State Administration	\$186,457	\$192,595	\$191,907	\$191,907
Discretionary Grants	\$186,457	\$192,595	\$191,908	\$191,908
Total Federal Funds	\$3,729,141	\$3,851,915	\$3,838,146	\$3,838,146
FFY 2019	\$3,729,141			
FFY 2020		\$3,851,915		
FFY 2021			\$3,838,146	
FFY 2022				\$3,838,146

¹ Base Awards Only