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Department of Community &
Economic Development

CENTER FOR COMMUNITY SERVICES

Title: Administrative Procedures for CSBG Grants

Directive #: C2016-01

Effective: July 1, 2016

To: Community Services Block Grant Subgrantees

From: Lynette Praster, Director – Center for Community Services

1.0 Purpose:

To establish administrative procedures that CSBG eligible entities must have in place in order to demonstrate compliance with federal regulations.

2.0 Revision History:

This CSBG Directive replaces 2014-01 and is effective July 1, 2016.

3.0 Procedure – Administrative:

By Laws – It is the responsibility of the board of directors of each non-profit agency to determine by laws, appropriate for the administration of that agency. All by laws must contain specific agency operations in the following areas: All by-laws should be reviewed from time to time to insure that they are current and relevant. A current copy of the agency's by-laws must be kept on file with the Department of Community and Economic Development.

A. Board Composition

1. The minimum and maximum number of members that will comprise the board. Boards must consist of at least 15 members but no more than 51 members. Members are selected by the Community Action Agency.
2. Boards for both private and public community action agencies must contain the following tripartite representation for board membership:
 - One third elected public officials currently holding office or their designated representative. If the number of elected officials reasonably available and willing to serve is less than one-third of the membership of the board, appointed public officials may be counted in meeting the one-third requirement.

- At least one-third representing the poor and chosen by democratic selection procedures in the area served. A description of how these procedures will be implemented must be stated in the agency's by-laws. Representatives of the poor must reside in the service area of the agency as required by Section 676B of the Community Services Block Grant Act.
- The remainder must be members of business, industry, labor, religious, welfare, education or other major groups and interests within the community.
- Agencies that are political subdivisions or migrant/farm worker organization or other limited purpose agency, an administering board must be established. An administering board is constituted in the same manner as a governing board. An administering board must involve representatives of the client population and the private sector in the determination of program policies and procedures rather than provision of advice. [See CSBG Directive C2016-03, Administrative Boards for additional guidance.]

See Directive C2016-02 – Governing Boards, for specific guidance about Tripartite Board representation.

B. Length of Services

Public officials or their representatives serve at the pleasure of the designating officials as long as the public official is holding office. The tenure for representatives of the poor and of the private organizations shall be at the discretion of the board and must be stated in the agency's by laws. Term limits are to be included if determined necessary by the agency.

Addressing term limits or periods of service in agency by laws helps to ensure that the membership is truly representative of the current residents of the area being served, including racial and ethnic composition, as determined by periodic selection or re-selection by the community, based on the demographic changes documented in most recent community needs assessment.

The CSBG statute does not require term limits. However, DCED requires that term limits, if in use, are addressed in by laws. Community Action agencies may impose such limits through inclusion in the bylaws, indicating that the service of board members is prioritized and evaluated for at least attendance and commitment on a documented basis. This analysis should include that board members are either replaced due to lack of commitment (i.e. missing a specific number of meetings, lack of participation, etc.) and/or re-nominated based on the recommendations of a nominating committee.

C. Board Authority

CSBG eligible entities must have either a Governing Board or an Administrative Board. Refer to CSBG Directive C2016-02, Governing Boards and/or C2016-03, Administrative Boards for specific guidance on board authorities and responsibilities.

D. ROMA Training

All new Board members must receive some form of ROMA Training for Board Members within six (6) months of being seated. The entire Board must undergo ROMA refresher training conducted by a certified ROMA Trainer every twenty four (24) months at a minimum.

E. Board Conduct Principles

Three (3) primary legal principles should be followed by the Board of Directors. These principles are: Obedience, diligence and loyalty.

1. Obedience is the duty of board members to ensure that the organization does what is expected of it, and does not undertake any action that is beyond its powers as defined by statutes, its corporate charter or by laws.
2. Diligence is the duty of board members to ensure against negligent mismanagement. Such mismanagement can hinge on inaction as well as overt actions. Mismanagement stemming from inaction results when specific responsibilities have been delegated to a board member or committee and that person or group fails to exercise diligent inquiry or oversight that might include failure to attend or hold board meetings to seek out the information necessary to carry out the responsibilities that were delegated to the person or committee.
3. Loyalty is the duty of board members to adhere to the mission of the organization, to adhere to the authorities granted to the organization and requires that board members not engage in personal activities in such a manner as to cause harm or to take advantage of the organization.

F. Board Meeting Requirements

Board meetings should be held not less than quarterly. A quorum must be present for all decisions requiring voting. The constitution of a voting quorum must be described in the Agency's By-Laws. Board meetings must be formally documented by minutes. Bylaws must include this specific operational requirement.

G. Fiscal and Program Management

A description of the responsibility of the board for the setting of policy governing contract and fiscal management of CSBG programs should be included. All CSBG-funded programs are required to follow all articles of the agency's CSBG contract and sub-contracting guidelines.

H. Non-Discrimination

In accordance with the federal CSBG and the commonwealth's contractual obligations, agencies are prohibited from discrimination against employees or persons seeking employment or seeking services under the CSBG Act on the basis of race, religion, color, national origin, sex, age or handicap.

I. Conflict of Interest

In accordance with Commonwealth contractual obligations, all agency staff, board members and volunteers are prohibited from having a conflict of interest or from obtaining private gain for themselves or others from the CSBG program.

Individuals serve on tripartite boards to advance the interests of the agency, its clients and the community. They do not serve to advance personal interests and have a 'duty of loyalty' to the agency. The very nature of the tripartite board which includes community representation creates possible situations in which distinctions of loyalty and interest need to be kept clear and unambiguous.

To safeguard against situation in which the loyalty, interest or intent of the board member action may be questionable, the following minimum conflict of interest practices are recommended.

1. Clear, written policy

Each agency should have a clear, written policy concerning conflicts of interest or loyalty among board members and agency staff that describes in detail:

- a. Full disclosure of financial interest requirements for all board members and staff;
- b. Conditions and procedural requirements for board members and/or staff withdrawal from any action for which a real or potential conflict of interest might exist;
- c. Transparency and full record keeping of all board and agency financial decisions and the parties involved in the actions and decisions; and
- d. Policies and procedures for independent prior review of actions or decisions that may pose potential conflict of interest issues.

2. Avoidance of situations that advance board member interest or present the appearance of advantage.

The very nature of tripartite representation on boards creates potential conflict of loyalty or interest situations in which board members help the agency to establish linkages with public and private community resources and services. This outreach may result in financial arrangements or contracts involving expenditure of agency funds. Board members have inside knowledge of agency activities and operations including current and future employment opportunities within the agency. To avoid situations in which a conflict of interest or loyalty would occur, or the appearance of such a conflict, the following is recommended:

- a. Competitive bidding procedures should be used for large financial transaction situations in which a board member or agency staff member has an interest in, or relationship to, one or more providers of the needed goods or services. If such a potential is unclear, the agency and its board should refer the issue to a pre-identified “independent” conflict of interest consultant or group for a determination. For smaller transactions that may involve board or staff member interests, a process involving collection of comparable quotes, prices, or salaries may suffice.
- b. If, after a competitive process, a provider with ties to a board member(s) or staff is selected to enter into a financial arrangement with the agency, the affected board member(s) and staff must disassociate themselves from participating in any decisions regarding the conduct of the financial relationship. Neither board member(s) nor staff may benefit personally, in any way, from the financial relationship between the agency and the provider with which they have a connection.
- c. Board membership should not be used as a “stepping stone” to agency employment. Board members should not seek or receive employment from the agency in any part-time or full time capacity during their service on the board. Board members wishing to be considered for employment should resign their position and wait a specified period of time designated by the board, but at a minimum of six (6) months, before applying for a paid position within the agency. This waiting period is recommended to avoid both the actuality and appearance of undue advantage board membership affords in the hiring of agency management and staff.
- d. Board members and their families should not enjoy any financial gain from their position, including receipt of salary, goods or special services for their board participation. Board members may be reimbursed for expenses associated with board service, such as incidental costs of supplies, or mileage, per diem, and lodging expenses incurred while attending out of town conferences or training approved by the entire board.
- e. Agencies and board should err on the side of caution in all matters that might create or appear to be a conflict of interest. They should use the proverbial “smell test” in all potentially questionable conflict of interest situations and call upon independent, outside counsel, both legal and ethical, to screen plans before action.

It should be noted that board members, especially those that represent low-income individuals or families, are not excluded from being clients of the agency and receiving program services for which they are eligible. These board members should not receive preferential treatment in the nature or timing of such services.

J. Client Files

The board shall establish written policies for the maintenance of client files and provisions of confidentiality of those files. Client files should contain the following information at a minimum:

- Intake forms with client signature
- Eligibility determination
- Unique Client Identification Number
Client Self Sufficiency Plan – Must be signed by client and staff member assigned
- Service documentation, including progress/case notes
- Discharge or termination of services plan

K. Personnel Policies

(i) Written Policies

The board must establish written personnel policies, rules and regulations. They must be in conformity with all applicable federal and state laws governing the types of employees employed by the agency. They must be made available to all staff members. The format is at the discretion of the agency. The following topics must be covered.

- Recruitment, application, appointment and job descriptions;
- Types of employees;
- Pay plan and rules for rates of compensation, increments, anniversary dates, costs of living factors, compensatory time, overtime, temporary reassignment, promotions, demotions and transfers;
- Benefits and eligibility for benefits for employees by employment status – fringe benefits, annual leave, compensatory time, holidays, sick leave, benefits for work related injuries and disease, parental leave, military leave and administrative leave;
- Attendance – hours of work, rest periods and meal periods;
- Employee Development – in-and-out services training including developing a working knowledge of ROMA Principles as they relate to the performance of the employee's job duties.
- Performance evaluation – standards, evaluation period, rating definitions, evaluators and evaluation review;
- Conduct, disciplinary action and prohibitions;
- Employee grievance procedures;
- Termination of Employment – voluntary and involuntary

(ii) Salaries and Leave

Salaries shall be set in accordance with applicable state and federal laws.

Fringe benefits paid from CSBG funds must be in accordance with the written

established policies consistently followed by the Community Action Agency. Further, such costs charged to the CSBG must be in proportion to the relative amount of time the staff involved actually devotes to CSBG activities. This must be supported by time sheets signed by the employee. Reimbursement of employees for unused leave must be in accordance with the Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards; Final Rule, 2CFR Chapter 1, Chapter 2, Part 200, et. al. (aka the "Super Circular").

(iii) Travel

Community Action Agencies and their sub-grantees must make use of current state travel reimbursement rates, or rates established by their board of directors or local government in the case of public Community Action Agencies. When a CAA elects to establish its own reimbursement rates, such policies must be committed to writing. See 2011 Fiscal Directive #1, issued October 1, 2011.

(iv) Affirmative Action

In accordance with both federal and state policies, all agencies must develop a written affirmative action plan that details the activities and a timetable for the agency to involve minority groups and women at every level of employment and decision making within the agency.

(v) Nonsmoking Policy for Children's Services

Smoking within any indoor facility owned or leased by an agency or its subgrantees utilized for the provision of routine or regular kindergarten, elementary or secondary education or library services of children is prohibited.

Smoking within any indoor facility owned or leased by an agency or its CSBG subgrantees utilized for the provision of routine or regular health care, day care or early childhood development (including Head Start) services to children is prohibited.

(vi) The Americans with Disabilities Act

No individual with a disability shall, on the basis of the disability, be excluded from services provided or administered with CSBG funds.

The Commonwealth shall be held harmless from all losses, damages, expenses, claims, demands, suits and actions as a result of the CSBG grantee's failure to comply with The Americans with Disabilities Act.

Note: A current copy of the agency's Personnel Policies and Affirmative Action Plan must be kept on file with the Center for Community Services.

4.0 Notations:

This directive shall supersede and replace in its entirety the following directive:

- *Directive C2013-01, Administrative Procedures for CSBG Grants*

5.0 Effective Date:

This directive shall take effect July 1, 2016 and replaces Directive #C2013-01. It shall remain in effect, in its entirety, until such time as it is amended, replaced, superseded, or nullified. Only a directive from the Center for Community Services or equivalent office may countermand any statement herein contained.

cc: Center for Community Services Staff
Fiscal Management Center, DCED



Department of Community &
Economic Development

CENTER FOR COMMUNITY SERVICES

Title: Governing Boards

Directive #: C2016-02

Effective: July 1, 2016

To: Community Services Block Grant Subgrantees

From: Lynette Praster, Director – Center for Community Services

1.0 Purpose:

To provide guidance to private, nonprofit Community Services Block Grant eligible entities regarding Governing Boards.

The tripartite composition of the CAA governing board is required by sections 676 B of the Community Services Block Grant Reauthorization Act of 198 and they are responsible for oversight and governance of community action agencies according to the following.

2.0 Revision History:

This CSBG Directive replaces C2014-02 and is effective July 1, 2016.

3.0 Policy:

Tripartite Board Composition

The Governing Board of the CAA has full policy and decision-making authority for the CAA, and consequently, bears the full responsibility for any and all actions taken by the agency. Legally, the Governing Board is the CAA. This point is important when considering the relationship between the CAA and the state. This relationship is based on a grant from the state to the Board, and it is the Board, not the Executive Director, that the state holds responsible for abiding by the terms of the grant. This fact is often misunderstood by both the agency's Executive Director and staff alike. No matter how effective an Executive Director may be, the Board must be in control of the CAA to assure accountability for public funding.

To achieve the purpose intended by statute for each of the three components of agency boards, local agencies are directed to adhere to the following:

1. Representatives of Low Income Individuals and Families

The statute requires that representatives of low-income individuals and families be "chosen in accordance with democratic selection procedures" **and must currently reside within the agency's service area.** The implicit intent of this requirement is to

insure that those who currently reside in areas served by the agency are represented so that they have a strong voice in agency governance and direction and are able to convey to those they represent the presence and significance of community action in their lives.

Because some programs within Community Services Block Grant eligible entities, especially Head Start, also require governance involving families being served, overall agency coordination and communications across programs are further enhanced when a few (one or two) members of Head Start Policy Councils serve on agency tripartite boards. The Head Start regulations require that the Policy Council and the Board cannot have identical membership so this must be observed.

Every effort should be made by eligible entities to ensure that board members representing low-income individuals and families:

- have been selected on the basis of democratic procedure either directly through election or public forum, or if not possible, through a similar democratic process such as election to a position of responsibility in another significant service of a community organization such as a school PTA, a faith-based organization leadership group or an advisory board/governing council to another low-income service provider;
- are truly representative of *current* residents of the geographic area to be served including racial and ethnic composition, as determined by periodic selection or reselection by the community. Being current should be based on the recent or annual demographics changes as documented in the community needs assessment. This does not preclude extended service of low-income community representatives on boards, but does suggest that continued board participation of longer term members be revalidated and kept current through some form of democratic process and the assessment of community changes.

2. Elected Public Officials or their Representatives

The overarching purposes for having elected officials serve on tripartite boards are to encourage awareness of poverty needs within the community and action by local governments, and to foster close coordination and partnership between public agencies and the eligible entities. The statute requires that elected public officials must be “holding office on the date of selection” to a tripartite board; however the statute does not identify which public officials should serve on the tripartite board. The statute allows public officials (elected or, if necessary, appointed) to name someone to represent them on the board. Again, while the statute does not set term limits for this category of board membership, the spirit of the law suggests that the local governments participate in agency oversight and governance:

- **Elected officials serve on boards in this capacity only while they are in office.**

Similarly, individuals designated by elected or appointed officials to represent them on boards serve only while their principals are in office or are re-designated by those in

office. Agencies are responsible for making sure that this category of board membership remains current through such procedures as prompt notification of newly elected or currently elected public officials of the opportunity for board service or representation, and timely replacement of board members (or their representatives) who no longer hold public office.

Local agencies that wish to extend the board service of either formerly elected officials or their representatives may choose to appoint them as representatives of “major groups and interests in the community.”

3. **Representatives of Major Groups and Interest in the Community**

While the statute does not set term limits for these board members, their role is to reflect and involve key interests and resources within the community to guide agency actions and outcomes. For this category, agencies should strive to assure that:

- groups and interest with *current* influence or resources deemed *critical* to the success of the agency are represented;
- members are empowered by their organizations to participate in board activities and play a role in agency outcomes.

Tripartite Board Responsibilities

1. **Development**

As the designated anti-poverty agency within their community, both public and private eligible entities are required to conduct periodic needs assessment of the causes and conditions of poverty within their service area and to decide what role, or mission, the agency will assume relative to other community organizations and resources, in addressing those needs.

Tripartite boards are key players in these developmental processes:

- **Needs Assessment** – Board members, especially those that live in communities to be served and that represent low-income people, should be a primary source of information and insight concerning the conditions in their neighborhoods. Representatives of low-income families can help fashion agency outreach and communication strategies, on an ongoing basis, to assure that agency staff and programs are responsive to changing community needs and conditions. Board members that represent elected officials, and other community groups and interests, all bring critical information and perspective to the needs assessment process. Elected officials or their representatives can commission or make available government-sponsored studies of local economic, social, educational, and key conditions that affect poverty. Business, labor, religious, and other community group representatives offer similar information from the private sector and access to short-term and longer-range service and resource assessments and/or

development plans that may impact the nature or extent of poverty in the community.

- **Clarifying Agency Mission** – The way each Community Action Agency perceives its role, or mission, is central to what they do and how they assess their effectiveness. Tripartite boards, if correctly constituted, provide an agency with a broadly-based, in-house panel of “experts” on most aspects of community need, resources, and opportunities. Their expertise should help inform agency leadership and staff concerning the role(s) community action should and could play to reduce poverty vis-à-vis other public and private programs and initiatives. Creating and/or periodically reviewing mission statements can provide a focus for collaborative strategic planning among board members and agency leadership and staff, and a foundation for meaningful board oversight of agency operations and effectiveness.

2. Planning

Tripartite boards are important participants in agency annual and longer-range planning activities. Specifically, individual members of the board, and the board as a whole, should contribute to, and benefit from, various aspects of program planning:

- **Long-range Strategic Planning** – For those CSBG entities that are 501 (c) (3) non-profit agencies, tripartite boards are ultimately responsible for the overall direction, conduct, and effectiveness of agency programs and activities. Public agency boards are “advisory” and are intended to guide public officials that manage their agencies, both elected and appointed, with information and advice on how to reduce poverty within the geographic area being served. As such, participation of boards is essential in strategic planning discussions of how the agency will determine what constitutes its “success.” Tripartite boards should be encouraged to help the agency: a) identify board goals and results it hopes to achieve through its work among low-income individuals and families and with the community being served; b) mobilize an array of programs and activities, both within and outside the agency, to achieve those goals and results; and c) establish and maintain procedures for gathering and presenting information on goals and results for agency and board use.
- **Annual Planning** – Tripartite boards of both public and private entities should participate in the identification of what the agency hopes to accomplish each year and to help the agency establish specific performance expectations, in terms of both the nature and number of improvements to be achieved among low-income people and within the community, to guide agency programs and activities. Milestones, or intermediate steps toward achieving the ultimate results, should be identified by agency staff so that board members will be able to track progress throughout the year.
- **Agency Planning** - Boards are encouraged to identify possible ways to strengthen agency operations, including needed staff or facility

enhancements, and to identify specific results it expects to be achieved. Boards may choose to utilize annual agency performance expectations, or anticipated program results, as important components of annual performance plans and compensation agreements they negotiate with the agency's executive director and other key staff.

3. Implementation

Because members of tripartite boards have "fiduciary" responsibility for the overall operation of private, non-profit Community Action Agencies and statutorily described "advisory" responsibilities in public agencies, members are expected to carry out their duties as any "reasonably prudent person" would do. At a minimum, the Department of Community and Economic Development (DCED) suggests that this would require:

1. Regular attendance at board and committee meetings;
2. Thorough familiarity with core agency information, such as the agency's bylaws, articles of incorporation, sources of funding, agency goals and programs, federal and state CSBG statutes;
3. Careful review of materials provided to board members;
4. Decision-making based on sufficient information;
5. Ensuring that proper fiscal systems and controls, as well as a legal compliance system, are in place; and
6. Knowledge of all major actions taken by the agency.

Two aspects of the requirements described above: board oversight of agency programs and board oversight of fiscal control, are explained in detail by the following information:

- **Fiscal Controls** – Because tripartite boards of private, non-profit agencies are ultimately responsible for assuring that agency funds are spent and accounted for in accordance with all applicable federal, state, and local statutes and regulations, boards must make sure that fiscal controls and procedures are put in place and maintained by the agency that provide for:
 1. trained and qualified staff to manage fiscal accounts and records of the agency on a day-to-day basis;
 2. commonly accepted financial procedures for transactions, recordkeeping, and reporting, such as those required by the CSBG Act, Part 74 of the Code of Federal Regulations, the Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards; Final Rule, 2 CFR Chapter 1, Chapter 2, Part 200, et. al. commonly referred to as the OMB Supercircular;
 3. frequent reports to the board by agency fiscal staff on overall agency fiscal status, procedures, practices, and transactions;
 4. required board review and prior approval of all "substantial" agency fiscal transactions or commitments, as defined by statute or agency bylaws; and
 5. audits and audit reports to the board by a CPA firm *independent of board member of agency staff association.*

4. Evaluation

Tripartite boards of both public and private agencies are encouraged to focus their attention on *results* as set forth in the Results Oriented Management and Accountability (ROMA) documentation in all phases of agency program activity, including program development, planning, implementation, and especially evaluation. Boards should request and be provided with, information concerning actual changes or improvements that have occurred among clients and community as a result of agency assistance. To determine the relative “success” of the agency, its staff and programs, boards may compare the nature and level of these outcomes with performance expectations, or targets, which were developed during the agency’s planning cycle. Outcome or performance-focused information from one year can inform and strengthen program planning by the agency and its board in subsequent years.

Tripartite Board Relationship with Executive Director

The best relationship between a tripartite board and the agency executive is one that advances the work of the agency in achieving results, or improvements, in the lives of low-income people and the community in which they live. The following general principles are offered to promote strong, focused, and effective working relationships between the tripartite board and an agency’s executive director:

1. Boards Establish Policy, Executive Directors Execute Policy

Tripartite boards are responsible for establishing and approving policies that govern all aspects of agency operations, including agency and board bylaws, administrative and fiscal control policies, and personnel policies. Executive directors are responsible for assuring that the board established policies are carried out by the agency, and for providing information to the board on the execution of its policies as requested by the board. In many agencies, boards work with the executive director and agency staff collaboratively to develop agency policies and procedures, but the ultimate responsibility for promulgating such policies remains with the board.

2. Boards Set Agency Mission, Executive Directors Accomplish Agency Mission

Boards are responsible for determining the overall mission, or direction, of the agency, taking into account the needs of the community and the relative anti-poverty role played by the agency vis-à-vis other programs and resources in the community. Executive directors are responsible for providing the necessary information and assistance to the board that will help them determine the overall mission or direction of the agency, and for organizing the agency’s programs and services in such a way that will best accomplish the mission. In many communities, boards and executive directors (and agency staff) work collaboratively to both set the agency’s mission and organize programs and services toward that end.

3. Boards Set Performance Targets, Executive Directors Guide Work to Achieve Targets

Ideally, tripartite boards will officially approve annual performance targets, or outcomes they expect the agency to achieve. These performance targets may be developed in concert with the board, agency staff, and key community partners. How the agency organizes and operates services and programs to achieve these board approved performance targets is the responsibility of the executive director and the staff of the agency. Boards, therefore, should not routinely be involved in the day-to-day manner in which services are provided, but should pay particular attention to following the consequences, or results of agency programs as they unfold and are reported throughout the year.

4. Boards and Executive Directors Evaluate Agency Performance; both are Accountable

Based on reports of results generated by the agency and presented via the Executive Director, boards are ultimately responsible for deciding whether or not the agency and the executive director have been “successful” in accomplishing the mission of the agency. Boards are encouraged to focus on client and community results as a major factor in evaluating the work of the agency, its executive director, and staff. Indeed, such results may point to institutional needs, such as staff enhancement and training or program revisions, which may improve performance in subsequent years.

5. Boards Supervise Directly Only One Employee – the Executive Director

One of the most important concepts conveyed by agencies that have well-functioning relationships between their tripartite board and executive director is, “boards supervise directly only one employee – the Executive Director.”

This concept embodies the notion that board and agency staff functions are indeed separate, but they are joined through the relationship between the board and the one person they must hold accountable for the work of everyone else – the executive director. This clearly means the boards must hold the executive director responsible for the activities of the agency. The board should appraise the executive director’s performance on an ongoing basis, but at a minimum, the board should have a complete appraisal annually. Adopting this concept of “one employee” enables boards to refrain from bypassing their agency’s executive director to provide day-to-day instructions to agency staff (what many call “micromanaging”). It must be clear that the concept should not protect an executive director from gaining too much authority over all aspects of agency policy and operations by assuming roles and functions that clearly reside with the tripartite board.

The concept is not intended to diminish or distort the fiduciary responsibility of tripartite boards of private, non-profit agencies to oversee the overall functioning of their agency and the cumulative work of agency staff.

When a tripartite board is faced with the responsibility of recruiting and hiring a new executive director, members may set whatever criteria they deem appropriate.

Boards are encouraged to seek out and employ a leader capable of:

1. Working cooperatively with the board to assure there is on-going consensus concerning the agency's anti-poverty purpose, or mission among board members, agency staff and the broader community;
2. mobilizing and coordinating programs and services both within and outside the agency toward accomplishing this mission;
3. serving as a key community leader and advocate for the preservation and expansion of opportunities to assist low-income individuals and neighborhoods move out of poverty;
4. achieving strong administration and fiscal control over agency resources; and
5. employing performance-based management concepts embodied in Results-Oriented Management and Accountability (ROMA), and the Organizational Standards for CSBG Eligible Entities as outlined in The Department of Health and Human Services Information Memorandum Number 138 as the framework for relating to the board, and for all aspects of agency operations, including program planning, resource allocation, service provision, program and staff evaluations.

Training – Board & Fiduciary Responsibilities

All board members should receive timely and continuous training which includes new board member orientation, training on legal and fiduciary responsibilities and ROMA training. At a minimum it is recommended that board training cover the following topics:

- **Fiduciary Responsibilities**
 1. Orientation to statutory and regulatory requirements CSBG Act, other federal, state or local statutes and regulations specific to agency services, including non-profit board requirements.
 2. Agency articles of incorporation, bylaws, etc.
 3. Overview of Board functioning – appointment, representation, meetings, committees, conflict of interest policy, relationship to executive director and staff, etc.
 4. Role and Responsibilities of the Executive Director.
 5. Role and Responsibilities of the Board regarding the employment, retention, and compensation of the Executive Director and key staff.
 6. Overview of agency administration and financial management policies and procedures oversight role and responsibilities of the board.
 7. Orientation to, and how to oversee, agency mission, long-range and annual plans.
 8. Orientation to, and how to oversee, agency programs and services.
 9. Orientation to, and how to oversee, agency evaluation and reporting policies and procedures – role of the board in program and personnel performance evaluation.

- **ROMA Training**

All new Board members must receive ROMA Training for Board Members within six (6) months of being seated. The entire Board must undergo ROMA refresher training conducted by a certified ROMA Trainer every twenty four (24) months at a minimum.

- Agency Leadership – Board Roles and Responsibilities
 1. Agency Development
 - Needs/Assessment
 - Agency Mission determination
 2. Agency Planning
 - Strategic Long-Range Planning
 - Annual Planning – performance expectations and targets
 - Agency operational planning, i.e., staffing, facilities, etc.
 - Forming Partnerships with other resources in the community
 - Outreach and advocacy
 - Funding outreach opportunities
 3. Program Implementation
 - Tracking of Milestones, interim performance results and reports.
 - Making mid-course corrections to improve performance.
 4. Evaluation – Results-Focused Evaluation – clients and community
 - Results-Focused Evaluation (including ROMA) – agency and staff
 - Using Information for Planning
 - Using Information for Additional Funding and Advocacy

3.0 Notations:

This directive shall supersede and replace in its entirety the following directive:

- *Directive 2007-02, Governing Boards*

4.0 Effective Date:

This directive shall take effect immediately and replaces Directive #2007-02. It shall remain in effect, in its entirety, until such time as it is amended, replaced, superseded, or nullified. Only a directive from the Center for Community Services or equivalent office may countermand any statement herein contained.

cc: Center for Community Services Staff



Department of Community &
Economic Development

CENTER FOR COMMUNITY SERVICES

Title: Administrative Boards

Directive #: C2016-03

Effective: July 1, 2016

To: Community Services Block Grant Subgrantees

From: Lynette Praster, Director – Center for Community Services

1.0 Purpose:

The purpose of the directive is to provide additional guidance to Community Services Block Grant eligible entities that are units of local governments or limited purpose agencies concerning the composition and function of CSBG Administrative Boards.

2.0 Revision History:

This CSBG Directive replaces C2014-03 and is effective July 1, 2016.

3.0 Policy:

In those communities where the local political jurisdiction (city, county, etc.) has designated itself as the community action agency, the governing officials are required to establish an Administering Board. The Administering Board is constituted in the same manner as a Governing Board. Unlike the Governing Board, the Administering Board is not the source of all authority in the CAA, nor is it the legal embodiment of the CAA. The board's actual authority depends on the powers delegated to it by the governing officials of the political jurisdiction. It may function as Governing Board or, if the governing officials choose to withhold most substantive decisions making authority, it will be, in reality, a consulting body or an advisory board. It must, however, at minimum, involve representatives of the client population and the private sector in the determination of program policies and the procedure rather than the mere provision of advice.

Selection of Administrative Boards

Administrative Boards may be appointed by the chief elected official(s) of the local government involved or selected by a democratic process which is characterized by free and equal participation in the decision making process. In either case, the board membership must be composed of one-third local elected government official's currently holding office or their representatives, except that if the number of local elected officials reasonably available to serve is less than one-third of the board membership, then local appointed officials may be counted to fulfill this requirement. At least one-third of the administrative board membership must be representatives of low-income persons. Representatives of the low-income should

be persons directly affected or served by the CSBG program, “chosen in accordance with democratic selection procedures”, and must currently reside within the agency’s service area.

The remainder of the administrative board shall be composed of representatives of business, industry, labor, religious, welfare, education or other major interests in the community/ies served. The members of the administrative board, to the extent feasible, should also be geographically representative of the area served by the Community Action Agency/Limited Purpose Agency.

Responsibilities of the Administrative Boards

The State Community Services Act (P.L. 315 No. 46, as amended 2014) contains several provisions that are germane to the responsibilities of a CSBG Administrative Board. These provisions include the following:

- Section 5 (a), Powers of the Agency – requires that each Community Action Agency shall “be a continuing and effective mechanism for securing broad community involvement in the programs assisted under this Act”.
- Section 5 (b), (4), Functions of the Agency – states that Community Action Agencies shall, among other functions, establish “effective procedures by which the poor and area residents concerned will be enabled to influence the character of programs affecting their interest ...”.
- Section 5 (b), (5), Functions of the Agency – specifies that a Community Action Agency’s functions include “joining with and encouraging business, labor and other private groups and organizations to undertake, together with public officials and agencies, activities in support of the community action program which will result in the additional use of private resources and capabilities ...”.

Implementing these provisions requires the following, at a minimum:

- Regular administrative board meetings held not less than quarterly.
- Prompt filling of board vacancies when they occur. As a general practice, board vacancies should not persist longer than 90 days.
- Providing timely and continuous board training to include but not limited to ROMA and other CSBG related subjects, as necessary all new Board members must receive ROMA Training for Board Members within six (6) months of being seated. The entire Board must undergo ROMA refresher training conducted by a certified ROMA Trainer every twenty four (24) months at a minimum.
- Administrative board’s review and approval of the annual CSBG Application.
- Administrative board’s participation in the periodic evaluation of program outcomes.
- Administrative board’s review and comment on major changes in program priorities, direction or policies.

Terms of individual board membership are determined by the agency, but should represent the current needs of the agency.

Many CAAs find term limits helpful to keep boards revitalized and current. Community Action Agencies may impose such limits through their own bylaws if they wish.

Representatives of Low-Income Individuals and Families

The statute requires that representatives of low-income individuals and families be “chosen in accordance with democratic selection procedures”, and must currently reside within the agency’s service area. The implicit intent of this requirement is to insure that those who *currently* live in areas served by the agency are represented so that they have a strong voice in agency governance and direction and are able to convey to those they represent the presence and significance of community action in their lives. And, because some programs within Community Action Agencies, especially Head Start, also require governance involving families being served, overall agency coordination and communications across programs are further enhanced when a few (one or two) members of Head Start Policy Councils serve on agency tripartite boards. The Head Start regulations require that the Policy Council and the Board cannot have identical membership, so this must be observed.

Every effort should be made by eligible entities to assure that board members representing low-income individuals and families:

- Have been selected on the basis of some form of democratic procedure either directly through election, public forum, or, if not possible, through a similar democratic process such as election to a position of responsibility in another significant service or community organization such as a school PTA, a faith-based organization leadership group; or an advisory board/governing council to another low-income service provider;
- Are truly representative of *current* residents of the geographic area to be served, including racial and ethnic composition, as determined by periodic selection or reselection by the community. Being *current* should be based on the recent or annual demographics changes as documented in the needs/community assessment. This does not preclude extended service of low-income community representatives on boards, but does suggest that continued board participation of longer term members be revalidated from and kept current through some form of democratic process and the assessment of community changes.

Elected Public Officials or their Representatives

The overarching purposes for having elected officials serve on tripartite boards are to encourage awareness of poverty needs within the community and action by local governments, and to foster close coordination and partnership between public agencies and the eligible entities. The statute requires that elected public officials must be “holding office on the date of selection” to a tripartite board. The statute allows public officials (elected, or if necessary, appointed) to name someone to represent them on the board. While the statute does not set term limits for this category of board membership, the spirit of the law

suggests that local government officials participate in agency oversight and governance only as long as the elected officials serving on boards in this capacity remain in elected office.

Similarly, individuals designated by elected or appointed officials to represent them on boards serve only while their principals are in office or are re-designated by those in office. Agencies are responsible for making sure that this category of board membership remains current through such procedures as prompt notification of newly elected or currently elected public officials of the opportunity for board service or representation, and timely replacement of board members (or their representatives) who no longer hold public office.

Agencies that wish to extend the board service of either formerly elected officials or their representatives may choose to appoint them as representatives of “major groups and interests in the community should such vacancies exist.”

Representatives of Major Groups and Interests in the Community

While the statute does not set term limits for these board members, their role is to reflect and involve key interests and resources within the community to guide agency actions and outcomes. For this category, agencies should strive to assure that:

- Groups and interests with *current* influence or resources deemed *critical* to the success of the agency are represented.
- Members are empowered by their organization to participate in board activities and play a role in agency outcomes.

None of the above guidance implies that administrative boards may assume responsibilities or powers associated with a board of directors. For example, administrative boards may not set salaries or hire/fire the executive director. However, the role of administrative communities in designing programs, providing input into decisions about program content and marshalling community support for programs should be substantive. Administrative boards can and should be a force for effectiveness in the Community Action Agency's operation.

4.0 Effective Date:

This directive shall take effect July 1, 2016 and replaces Directive #C2014-03. It shall remain in effect, in its entirety, until such time as it is amended, replaced, superseded, or nullified. Only a directive from the Center for Community Services or equivalent office may countermand any statement herein contained.

cc: Center for Community Services Staff



Department of Community &
Economic Development

CENTER FOR COMMUNITY SERVICES

Title: Income Eligibility Determination

Directive #: C2016-04

Effective: July 1, 2016

To: Community Action Agency/Limited Purpose Agency Directors

From: Lynette Praster, Director – Center for Community Services

1.0 Purpose

The purpose of this directive is to clarify policy concerning the determination of an applicant's income eligibility for services funded with Community Services Block Grant (CSBG) funds

2.0 Policy

- A) This directive applies to all applicants for CSBG-funded services unless specifically exempted in writing by the Department of Community and Economic Development.
- B) If CSBG funds are used primarily to support agency administration, then the agency should follow income eligibility determination for the particular services a client receives.
- C) If CSBG funds are directly used to wholly support a program, then CSBG income eligibility determination should be used for the clients receiving those services.
- D) If CSBG funds are being used to partially support direct program expenses, an equal percentage of the clients being served must meet CSBG income eligibility. (Example if a program is being supported by 20% of CSBG funds, 20% of the clients receiving that service **must** meet CSBG eligibility requirements).
- E) It is advisable to set up CSBG and/or any other program income eligibility determination as part of the overall agency intake process with a client in order to clearly define client participation in agency services.
- F) An applicant's income in relation to family unit size may not exceed 125% of the Federal Poverty Level (FPL).
 - 1) (FPL) as determined by the Department of Health and Human Services (HHS) and published annually at www.hhs.gov.
 - 2) The Federal Poverty Income Guidelines (FPIGs) are generally updated once a year at the beginning of the calendar year for the previous calendar year and should **not** be used to determine eligibility.
 - 3) Subgrantees are responsible for using the most recent published Federal Poverty Levels (FPL) and should update these levels as often as they are updated on the website of the U.S. Department of Health and Human Services.

- G) Income eligibility determination shall be based on total family unit income for the thirty day (30) period immediately preceding the date of application for services. The federal poverty level is based on annual income. Annual income is derived by multiplying income for the past thirty (30) days by twelve (12).

Income Determination

A) Income Inclusions

- i) Income is the total of salaries,
 - a. wages,
 - b. dividends,
 - c. interest,
 - d. unemployment compensation or
 - e. other cash receipts of all family members and other individuals residing in the applicant's house/domicile.

B) Income Exclusions

- i) welfare payments
- ii) Social Security Disability
- iii) Supplemental Security Income (SSI) and training program stipends.
- iv) Unrelated persons such as lodgers, foster children, wards or employees who reside in the household are separate family units for purposes of CSBG eligibility.
- v) Emancipated minors are also considered as separate family units in calculating income.
- vi). Salary or wages earned by a child(ren) under the age of eighteen residing in the applicant's house/domicile.

C) Determining Income Eligibility for Wards of the Court, Foster Children and Handicapped Persons

- i) Wards of the Courts: Public funds used to support youths who are wards of the court should not be regarded as income. Certifying documentation may include letters or documents from the court, local family and children service agency or similar organizations stating that the youth is a ward of the court. No other eligibility documentation will be required unless the youth receives some other source of income that falls within the CSBG definition of income.
- ii) Foster Children: Neither public funds for the youth's support nor the foster family's income should be used for income eligibility determination of the foster child(ren). Public support for the youth should be regarded the same as welfare payments. Certification may be made by the foster parents, local family and youth services agencies, welfare office or similar organizations.

D) Accepted Documentation of Income

- i) Salary or wage statements or W-2 forms
- ii) A case number with at least phone verification or a signed statement from the

County Assistance Office or Social Security Office stating that the family unit is receiving Temporary Assistance for Needy Families (TANF), General Assistance, Supplemental Security Income (SSI), Social Security Disability(SSDI)payment or Social Security Retirement payments.

- iii) Verification of income received from an agency providing subsidized day care services or subsidized housing.
- iv) A statement, signed and dated by the applicant, or in the case of a minor his/her parent or guardian, certifying that the family unit income does not exceed 125% of poverty (self-declaration). A statement should be in the client file explaining why a self-declaration was used. This method of documentation should only be used for the first 90 days of service. If an applicant does not produce proof of income within 90 days of initial service, a redetermination must be performed or service may be terminated at the discretion of the Agency.
- v) The only exception to income documentation requirements is for services provided by outreach and referral programs.

E) Frequency of Determination

- i) Following the initial determination of income eligibility, redetermination must be made every three hundred and sixty five (365) days in order to insure that any major life events such as employment status, birth of a child, divorce, etc. are reflected in the family's eligibility for persons receiving continuous service. Should the agency become aware of a change in the income status of the family/individual (i.e. increase in salary) a redetermination should be performed as soon as is feasible to ascertain eligibility.
- ii) Redetermination is necessary if ninety (90) days elapse before the first or any service is provided.

3.0 Notations

This directive shall supersede and replace in its entirety the following directives:

- *Directive C2014-04 , Income Eligibility Determination*

4.0 Effective Date

This directive shall take effect immediately and replaces Directive #C2014-04. It shall remain in effect, in its entirety, until such time as it is amended, replaced, superseded, or nullified. Only a directive from the Center for Community Services or equivalent office may countermand any statement herein contained.

cc: Center for Community Services Staff



Department of Community &
Economic Development

CENTER FOR COMMUNITY SERVICES

Title: Reporting Requirements

Directive #: C2016-05

Effective: July 1, 2016

To: Community Action Agency/Limited Purpose Agency Directors

From: Lynette Praster, Director – Center for Community Services

1.0 Purpose:

Provides direction on the reporting requirements of programs administered and funded by the Community Services Block Grant.

2.0 Revision History:

This CSBG Directive replaces C2014-05 and is effective July 1, 2016.

3.0 Policy:

Program Reports

1. Community Organization Planning and Outcome System (COPOS)

COPOS collects data on the entire Pennsylvania system of-Community Services Block Grant eligible entities and it parallels the data collected through the Community Services Block Grant Information Survey (CSBG-IS) administered by the National Association of Community Services Program (NASCS). DCED and the federal government will use this information to evaluate the effectiveness of Community Action Agencies in Pennsylvania.

COPOS is Pennsylvania's recognized electronic reporting format to collect information regarding the programs administered by CSBG eligible entities. COPOS is the only data collection tool that will be used by DCED to complete the CSBG-IS. Data reported through COPOS will assist agencies to prioritize their resources and achieve outcomes. Data will be provided to Congress and other federal departments to demonstrate how CSBG eligible entities improve local communities.

CSBG eligible entities in Pennsylvania must adhere to the following reporting schedule:

- **Proposed numbers (aka targets):** of clients to be served as determined by the community needs assessment and plan submitted as part of the contractual work plan are to be submitted electronically into COPOS. The proposed target numbers entered in to COPOS will reflect the work to be

performed by the agency during the calendar year. These numbers will be due 45 days after the start of the calendar year. The exact due date for these numbers will be electronically transmitted to users by COPOS. Upon approval from DCED permission may be granted to edit target numbers after the due date.

- COPOS outcome reports (aka achievements) are to be submitted electronically four times during a contract year at three month intervals. Each quarterly outcome entered will be cumulative for the calendar year. Quarterly reporting will be due 30 days following the end of quarter. Yearly reporting will be due 45 days after the close of the calendar year. The exact due dates for these numbers will be electronically transmitted to users by COPOS. Data needs to be entered into COPOS by the lock dates to allow sufficient time for DCED to review and analyze the data prior to submitting it to meet the federally mandated deadline.
- Failure to meet any of the deadlines may negatively impact the processing of funds.

The COPOS User Manual is available at www.pa-copos.org for instruction and guidance when using the system.

2. Fiscal Status Reports (FSR)

Invoicing accompanied by a Fiscal Status Report are required on a monthly basis. Once all funds have been received a final FSR is required. See Financial Management Center Directive 2014-01 for additional instruction.

3. Property Inventory

A Property Inventory Report is due 30 days following the conclusion of the contract. See CSBG Directive CW2014-02: Property Inventory Control Procedures for the reporting format.

4. Organizational Standards Assessment Report

Effective FY 2016 (October 1, 2015) OCS IM 138 requires States to ensure CSBG Eligible Entities meet all Organizational Standards. As part of Pennsylvania's implementation of the Organizational Standards, all Community Services Block Grant Sub-grantees (Community Action Agencies) are required to continuously review and update the Organizational Standards Assessment Tool during each state fiscal year. The Assessment will be submitted to the State annually in conjunction with the 12 month COPOS Report (no later than 45 days following the beginning of each calendar year). The tool is accessible at the COPOS website. The Assessment should be approved by the agency's Chief Executive Officer.

4.0 Effective Date:

This directive shall take effect July 1, 2016 and replaces Directive #C2014-05. It shall remain in effect, in its entirety, until such time as it is amended, replaced, superseded, or nullified. Only a directive from the Center for Community Services or equivalent office may countermand any statement herein contained.

cc: Center for Community Services Staff



Department of Community &
Economic Development

CENTER FOR COMMUNITY SERVICES

Title: Monitoring Procedures

Directive #: C2016-06

Effective: July 1, 2016

To: Community Action Agency/Limited Purpose Agency Directors

From: Lynette Praster, Director – Center for Community Services

1.0 Purpose:

To provide guidance and an outline of the protocol of the Department of Community and Economic Development's (DCED) monitoring of Community Services Block Grant eligible entities.

2.0 Background:

Beginning in 2016, PA's goal is to conduct a full on-site program review once every two (2) years as stated in the 2016-2017 CSBG State Plan submitted by Pennsylvania. A desk monitoring will be implemented for those grantees not receiving an on-site monitoring. Reviews will be conducted for the 44 eligible entities. More frequent on-site visits either program or fiscal will also be scheduled as needed when performance and/or risk factors are identified.

3.0 Policy:

Program Monitoring

It is the responsibility of the Department of Community and Economic Development (DCED) to monitor the CAAs at least once during every three year period to assure compliance with contractual obligations as per Article V. Compliance with Applicable Statutes and Department Regulations of the Community Services Block Grant contract. This monitoring process also advises DCED of the effectiveness and outcomes of local agencies in conjunction with the objectives of the Community Services Block Grant (CSBG), and federally issued CSBG Organizational Standards

An on-site monitoring visit is conducted for the following purposes:

- ensure programmatic and contractual compliance through the review of agency records and interviews with agency personnel, board members and clients;
- follow-up on program and personnel complaints;
- comply with an agency's request for an on-site visit; and
- discuss technical assistance needs.

Following either a desk review or an on-site visit, a verbal review will be conducted during the exit interview. A finalized written report will be mailed to the grantee within thirty (30) days of the completion of the monitoring visit. It shall identify strengths and weaknesses of the program and any required remedial actions.

Fiscal Monitoring

Further, any entity receiving Community Services Block Grant funds is subject to a fiscal monitoring conducted by the Department's Financial Management Center.

When sub-recipients are being fiscally evaluated, the following areas are tested, using checklists, observations, interviews, and management representations, to meet the objectives of fiscal review:

- Internal Controls
- Separation of Duties
- Expenditure Reporting and Testing
- Cash Management
- Payroll
- Inventory

Attachment D provides instructions and involve a series of questions for each of the areas listed above. Upon completion of testing, one should be able to identify both the fiscal strengths and weaknesses of any organization.

4.0 Notations:

This directive shall supersede and replace in entirety the following directive:

- *Directive C2014-06.*

5.0 Effective Date:

This directive shall take effect January 1, 2016 and replaces Directive #C2014-06. It shall remain in effect, in its entirety, until such time as it is amended, replaced, superseded, or nullified. Only a directive from the Center for Community Services or equivalent office may countermand any statement herein contained.

6.0 Attachments:

Attachment A - Pre-Visit Questionnaire

Attachment B - On site Monitoring Review Guide and Tool utilized by DCED

Attachment B-1- Client File Worksheet

Attachment B-2 -Board Meeting Attendance Report

Attachment C - Desk monitoring Tool to be utilized by DCED.

Attachment D - Fiscal Monitoring Checklists used by Financial Management Center

cc: Center for Community Services Staff
Financial Management, DCED



COMMUNITY SERVICES BLOCK GRANT PRE-MONITORING QUESTIONNAIRE

GENERAL INFORMATION

| | |
|---------------------------|------------------|
| AGENCY: | CONTRACT NUMBER: |
| DCED PROGRAM SPECIALIST: | REVIEW DATE: |
| AGENCY REPRESENTATIVE(S): | |
| COMPLETED BY: | DATE: |

| Number of Counties ____ and/or Municipalities ____ being served by agency? | | | | | | | | | | | | | | | | | | |
|---|--|---|----------------------|------------|----------------|------------------|--------------------------|--|--|--|----------------------------|--|--|--|--------------------------------|--|--|--|
| Does your agency have satellite/remote offices funded by the CSBG contract? <input type="checkbox"/> Yes <input type="checkbox"/> No | | | | | | | | | | | | | | | | | | |
| The following pertains to agency facilities not agency subcontractors. | | | | | | | | | | | | | | | | | | |
| Please provide the following information for each location: <i>(Provide additional locations as a word file)</i> | | | | | | | | | | | | | | | | | | |
| Location of office(s): | Number of staff: | Number of clients: | | | | | | | | | | | | | | | | |
| Listing of services provided: | | | | | | | | | | | | | | | | | | |
| How is supervision provided? | | | | | | | | | | | | | | | | | | |
| Are the offices connected via a computer network to the main office location? <input type="checkbox"/> Yes <input type="checkbox"/> No | | | | | | | | | | | | | | | | | | |
| Who handles the oversight responsibilities related to the agency's CSBG program? | | | | | | | | | | | | | | | | | | |
| Briefly describe the collaboration (who, what, how) that occurs to address poverty issues throughout the various areas served: | | | | | | | | | | | | | | | | | | |
| Indicate which federal objectives are met through CSBG program operations: | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Employment | <input type="checkbox"/> Income Management | <input type="checkbox"/> Emergency Services | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Education | <input type="checkbox"/> Housing | <input type="checkbox"/> Self-Sufficiency | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Linkages | <input type="checkbox"/> Health | | | | | | | | | | | | | | | | | |
| Indicate which national goals are being met through CSBG program operations: | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Low-income people become more self-sufficient. | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Conditions in which low-income people live are improved. | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Low-income people own a stake in their community. | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Partnerships among supporters and providers of services to low-income people are achieved. | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Agencies increase their capacity to achieve results. | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Low-income people, especially vulnerable populations, achieve their potential by strengthening family and other supportive systems. | | | | | | | | | | | | | | | | | | |
| Provide the following information regarding the agency's current board composition: | | | | | | | | | | | | | | | | | | |
| <table><thead><tr><th>Type of Board Member</th><th># of Seats</th><th># of Vacancies</th><th>% of Total Board</th></tr></thead><tbody><tr><td>Elected Public Officials</td><td></td><td></td><td></td></tr><tr><td>Low-Income Representatives</td><td></td><td></td><td></td></tr><tr><td>Private Sector Representatives</td><td></td><td></td><td></td></tr></tbody></table> | | | Type of Board Member | # of Seats | # of Vacancies | % of Total Board | Elected Public Officials | | | | Low-Income Representatives | | | | Private Sector Representatives | | | |
| Type of Board Member | # of Seats | # of Vacancies | % of Total Board | | | | | | | | | | | | | | | |
| Elected Public Officials | | | | | | | | | | | | | | | | | | |
| Low-Income Representatives | | | | | | | | | | | | | | | | | | |
| Private Sector Representatives | | | | | | | | | | | | | | | | | | |
| PLEASE PROVIDE A COPY OF THE AGENCY'S MOST RECENT BOARD ROSTER FOR REVIEW BY THE DCED PROGRAM SPECIALIST. | | | | | | | | | | | | | | | | | | |

TRIPARTITE BOARD

How are board members made aware of their roles and responsibilities regarding CSBG program operations?

Are all board members trained in Results Oriented and Management Accountability (ROMA) concepts? ☐ Yes ☐ No

When was the most recent ROMA training for the Board conducted?

SUBCONTRACTORS

Does the agency contract with another organization for the provision of any of the CSBG program services outlined in the workplan? ☐ Yes ☐ No

How many subcontracts has the agency entered into for the current CSBG program?

Please list the names of the subcontractor agencies and the respective amounts of each contract:

Who handles the oversight responsibilities for the agency's subcontractors?

Briefly describe how CSBG funds are allocated to, and utilized by, the agency's subcontractors:

Are all contracts with subcontractors available for review by DCED staff? ☐ Yes ☐ No

How often does the agency monitor its subcontractors?

Briefly describe the monitoring process for subcontractors:

Does the agency require all subcontractors to submit periodic, detailed reports which provide the necessary information for the Community Action Agency to complete timely and accurate reports as required in its contract with DCED?

Does the agency provide ROMA training for all of its subcontractors?

When was the last ROMA training conducted for subcontractors?

CLIENT FILES

Are client files complete, on-site, and available for inspection by DCED staff? ☐ Yes ☐ No

Do client files contain the following documents and information:

- | | |
|---|--|
| <input type="checkbox"/> Intake forms with client signature | <input type="checkbox"/> A client signed plan for moving toward self-sufficiency |
| <input type="checkbox"/> Eligibility determination | <input type="checkbox"/> Progress Notes |
| <input type="checkbox"/> Type of service or assistance | <input type="checkbox"/> Discharge Plan / Case Closure |
| <input type="checkbox"/> Date(s) of service | |

Does the agency have a posted grievance process for those denied services? ☐ Yes ☐ No

What procedures does the agency have in place regarding denial of services to applicants determined ineligible for services?

Has the agency received any grievances regarding the CSBG program? ☐ Yes ☐ No

PROGRAM OPERATIONS

What is the agency's current assessment of its progress towards accomplishing the objectives of its CSBG program as stated in the Application and Work Plan?

How often does the agency perform a needs assessment to prioritize its programs and ensure that the most needy are being served?

Who participates in the agency needs assessment process?

What service gaps do the agency and/or its subcontractors encounter?

Are all client service locations and meetings accessible to persons with disabilities?

Are there any unresolved findings or compliance issues previously brought to the agency's attention as a result of contract reviews, audits or other matters (e.g. single audit, loss of funding, etc.)?

What Technical Assistance and/or Training do the agency and/or its subcontractors currently need?

AGENCY SELF-ASSESSMENT

The following section requires a Self-Assessment of the agency's overall performance and vision for future operations. The extent to which the agency sets performance goals within the ROMA framework, systematically collects and analyzes data on performance measures, and adjusts its short and long range plans on that analysis constitutes significant evidence of the agency's commitment to making a difference for the individuals and families it serves and the communities where it works. In order for an agency to be truly healthy, it must be continually striving to find better ways to use programmatic resources to help people move out of poverty.

How many staff can articulate the agency's mission?

As a result of the needs assessment/ strategic planning process how has the agency added or deleted either direct services or community catalytic work?

Describe how the agency is working as a catalytic agent in the community.

How is the agency streamlining operations to eliminate duplication of services?

How is the agency integrating service delivery throughout the organization in an attempt to remove delivery of "siloe services" to reflect client movement along a self-sufficiency continuum?

How do programs operated by the agency contribute to the agency's overall mission? How does each program achieve measurable outcomes that help to change the lives of low-income people?

What are the areas of focus needed in order for the agency to implement and fully comply with the Organizational Performance Standards?

How does communication flow within the agency? Who are the primary communicators and how do they let people know what is happening? What information is communicated?

How does each department/division/program within the agency contribute to the goal of helping people out of poverty?

How are program directors involved in creating and monitoring their own budgets?

What types of supervision do program directors receive from management? How do they supervise their programs?

What is the date of the most recent agency strategic plan?

Who was involved in creating the strategic plan?

Is the agency's staff aware of the plan and its contents? Describe how staff were educated about the way their jobs contribute to fulfilling the plan?

How is the Executive Director actively involved in community partnerships, collaborations, and catalytic activities?

What staff, other than the Executive Director, are involved in community partnerships and collaborations? What roles are played?

How often does the agency conduct performance appraisals of staff? When was the last evaluation conducted?

What is the morale in the organization? What is the staff turnover rate of the past several years?

Do the records maintained by the agency for property acquired include the following information?

☐ Yes ☐ No a. Date the asset was acquired?

☐ Yes ☐ No b. Description of the asset?

☐ Yes ☐ No c. Physical location of the asset?

☐ Yes ☐ No d. Cost or valuation of the asset?

☐ Yes ☐ No e. Disposition of the asset?

☐ Yes ☐ No Is a periodic (at least once per year) physical inventory conducted to verify assets remaining in possession and control of the grantee?

☐ Yes ☐ No Are identification tags placed on all property and equipment acquired with CSBG funds in accordance with CSBG Directive CW 2014-02, Property Inventory Control Procedures (or subsequent directive)?

☐ Yes ☐ No If any property acquired with DCED administered funds was damaged, lost or stolen, was it promptly reported to DCED?

☐ Yes ☐ No Are there procedures to ensure that program income from the sale of real or non-expendable property is properly recorded and reported? If yes, describe:

☐ Yes ☐ No For expendable personal property, are there adequate records to support the receipt of goods, issuance of goods and the balance of goods on hand? Describe:

☐ Yes ☐ No Does the agency follow appropriate procurement procedures?

SIGNATURE

GRANTEE/SUBRECIPIENT:

AGENCY REPRESENTATIVE:

TITLE:

DATE:



COMMUNITY SERVICES BLOCK GRANT ON-SITE MONITORING TOOL

| GENERAL INFORMATION | |
|--|----------------------------------|
| AGENCY NAME: | CONTRACT NUMBER: |
| DCED CSBG MONITOR/REPRESENTATIVE: | |
| DATE OF VISIT: | AGENCY STAFF INVOLVED IN REVIEW: |
| <input type="checkbox"/> Yes <input type="checkbox"/> No Was a CSBG Pre-Visit Questionnaire mailed out to the agency at least two weeks in advance of the scheduled on-site visit? | |
| <input type="checkbox"/> Yes <input type="checkbox"/> No Did the agency complete and return the questionnaire? | |

In preparation for the on-site visit, review the agency's current contract file including log notes and correspondence to determine the following:

| REPORTING REQUIREMENTS | YES | NO | COMMENTS |
|---|--------------------------|--------------------------|----------|
| Is the agency submitting the Program Invoice forms on a timely basis? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is sufficient documentation submitted with each invoice to support the expenditures reported? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Are expenditures reported by the agency to date within the budgeted amounts by category per the contract? | <input type="checkbox"/> | <input type="checkbox"/> | |
| If reported expenditures exceed budgeted amounts by line item, has the agency requested an amendment to the original budget and/or provided adequate explanation for any significant variances? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is the agency on track to draw down the remaining balance of the award within the contract period? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Has the agency submitted required reports, including COPOS entries, on a timely basis? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is the agency participating in the ROMA system for measuring performance and results? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Based on the reports submitted to DCED, does the agency demonstrate that they understand national indicators? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Regarding the Organizational Standards, what is the number of non-compliant indicators? _____ out of a possible _____ | | | |
| Please list non-compliant indicators, if applicable: | | | |

Review the agency's Board roster and the information provided by the agency on the CSBG pre-visit questionnaire, and interview appropriate agency staff to complete the following:

| BOARD GOVERNANCE SYSTEM | YES | NO | COMMENTS |
|--|--------------------------|--------------------------|----------|
| Does the agency have a Tripartite Board in place to oversee its CSBG programs? | <input type="checkbox"/> | <input type="checkbox"/> | |

| | | | |
|--|---|---|--|
| Does DCED have a copy of the most recent board roster? Include date in comments. | C | C | |
| Does the Board roster include the name, title, address, sector represented, date appointed or elected, and term expiration date for all board members? | C | C | |
| Do representatives of low-income persons reside in the neighborhood from which they were elected? | C | C | |
| Have either public or low-income sector board seats remained vacant for more than 90 days? | C | C | |
| Does DCED have a copy of the most current by-laws? | C | C | |
| Is there a Code of Ethics for the board? | C | C | |
| Is the mission statement in the agency's Board Manual? | C | C | |
| Does the board approve the agency's annual budget? Include date of minutes showing approval in comments. | C | C | |

| BOARD GOVERNANCE SYSTEM (cont'd) | YES | NO | COMMENTS |
|--|-----|----|----------|
| Does the board approve the agency's policies? | C | C | |
| Do board members receive ROMA training? | C | C | |
| What is the date of the last ROMA training meeting conducted for the board? | | | |
| Does the board have committees structured to fully address its fiduciary and governance responsibilities? Please list the standing committees: | C | C | |
| Does the board have an adequate system for the orientation of new board members? | C | C | |

Review the minutes of several of the agency's recent board meetings to determine the following:

| BOARD MEETINGS AND MINUTES | YES | NO | COMMENTS |
|---|-----|----|----------|
| How often does the Tripartite Board meet? | | | |
| Are the regular board meetings open to the public? | C | C | |
| Has DCED been provided with a schedule of board meeting dates? | C | C | |
| What is the date of the most recent board meeting attended by the Program Specialist? | | | |
| Have all board minutes been submitted to DCED? | C | C | |
| Do the minutes list the board members in attendance & absent? | C | C | |
| Is there a quorum present at all meetings? | C | C | |
| Do the minutes indicate that the board members are aware of their roles and responsibilities with regard to the CSBG program? | C | C | |
| Are financial reports communicated regularly to the agency's board and policy groups? | C | C | |
| Is the board provided with current financial information? | C | C | |

| | | | |
|---|---|---|--|
| Is there evidence in the minutes that the board uses community needs and service gap analysis to establish service priorities and adopt program objectives? | C | C | |
| Do the minutes indicate that the agency's board fully participates in the development, planning, implantation and evaluation of the CSBG program? | C | C | |
| Does the board monitor staff development/training needs, plans and outcomes? | C | C | |
| Does the board monitor program performance by comparing outcome goals to outcomes achieved? | C | C | |
| Does the board evaluate major programs every three years, including regulatory compliance and outcome analysis? Tools/approach used? | C | C | |
| Additional comments on the board: | | | |
| | | | |

Obtain the most current roster of the agency's Board of Directors and extract the following information:

| BOARD COMPOSITION | | YES | NO | N/A | COMMENTS |
|---|-----------------------|----------------------------|----|-----|--------------------------------|
| Is the composition of the board appropriate, e.g., at least 1/3 democratically elected representatives of low-income individuals and at least 1/3 elected officials or their representatives? | | C | C | C | |
| Are election/selection procedures in accordance with agency by-laws and CSBG policy issuance? | | C | C | C | |
| Elected Public Officials | | Low-Income Representatives | | | Private Sector Representatives |
| # of Seats: _____ | # of Seats: _____ | # of Seats: _____ | | | |
| # of Vacancies: _____ | # of Vacancies: _____ | # of Vacancies: _____ | | | |

Based on the agency's operations and the updated information gathered during the current review, assess the agency staff assigned to CSBG program:

| PERSONNEL | YES | NO | COMMENTS |
|--|-----|----|----------|
| Does the agency have adequate staff assigned to administer the CSBG program activities effectively and efficiently? | C | C | |
| Did agency staff involved in the on-site review demonstrate knowledge of CSBG program guidelines and procedures? | C | C | |
| Has the agency experienced recent turnover in staff assigned to administer the CSBG program? | C | C | |
| Are all staff positions identified in the CSBG Contract application, and any amendments thereto, filled? | C | C | |
| Are all staff members performing the duties described in the job descriptions submitted when the CSBG contract was negotiated? | C | C | |

Review a sampling of client files to determine the following (Use DCED Client File Worksheets):

| CLIENT FILES / ELIGIBILITY | YES | NO | COMMENTS |
|--|--------------------------|--------------------------|----------|
| Is a client file maintained for each person served? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Does the form used for determining client eligibility list all eligibility criteria and the documentation needed to determine eligibility? | <input type="checkbox"/> | <input type="checkbox"/> | |
| For clients receiving direct services, is income documented for all members of the household 18 years and older? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is there evidence in the client files reviewed that documents that the agency has procedures in place to verify income amounts and family size as stated in the application? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is the agency using the appropriate Health and Human Services (HHS) poverty guidelines to determine eligibility? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Does the agency limit eligibility to clients at or below 125% of the HHS poverty guidelines? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Do intake forms include client characteristics necessary for the agency to file accurate demographic reports? (CSBG Information Survey and COPOS) | <input type="checkbox"/> | <input type="checkbox"/> | |
| Does the client signature section of the intake form include a self-declaration statement that the information provided is true and correct, to the best of the applicant's knowledge? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Do client files contain information regarding types of assistance and dates of services provided? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Do client files contain a log describing the nature of the service(s) provided, including the date and amount of services received? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Are all documents signed by the client where applicable (intake, eligibility, case management plan, etc.)? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Are proper procedures in place for case management, and is adequate client information and follow-up documented? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Does the agency have in place an effective system for tracking and reporting the number of clients transferring out of poverty as a result of the services provided by the agency? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Are referrals documented and logged in the client files? | <input type="checkbox"/> | <input type="checkbox"/> | |
| If follow-up activities were suggested as part of the case-plan were these activities documented in the client files? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is there evidence that applicants were apprised of grievance procedures if services were denied? | <input type="checkbox"/> | <input type="checkbox"/> | |

Review the current year budget for direct services line item(s). If the agency has set aside monies for direct services, review a sample of client files served with direct CSBG program funds to address the following (*skip this section if no direct services are provided*):

| CLIENT FILES – DIRECT SERVICES | YES | NO | COMMENTS |
|--|--------------------------|--------------------------|----------|
| Does the agency review the clients' financial status at least once every year? If not, how does the agency ensure ongoing eligibility? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is documentation such as a bill, voucher and/or copy of the check retained in the client file for services provided? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Are persons served and service units being counted correctly? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were detailed case management activities thoroughly documented in the client files? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is there a signed case management plan? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were client goals mutually agreed to and documented? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were efforts to achieve goals documented? | <input type="checkbox"/> | <input type="checkbox"/> | |

| | | | |
|--|---|---|--|
| Were goals oriented toward self-sufficiency? | C | C | |
| Are the services provided consistent with the program narrative and scope of work? | C | C | |
| Does the agency link with other programs in the community or area when services are beyond the agency's scope? | C | C | |
| Is the agency taking appropriate steps to ensure privacy and confidentiality of client information, such as secure files, confidentiality policies, private consultation space etc.? | C | C | |
| If the agency is no longer working with the client, is there a signed discharge plan? | C | C | |
| Are client records maintained for at least three years in accordance with contract language? | C | C | |
| Did the review of the client files sampled indicate that all clients provided services were eligible? If not, indicate the number of clients determined ineligible and/or unverifiable in each service category. | C | C | |
| Did the review of the documentation indicate that the services have impacted on client self-sufficiency? | C | C | |
| Additional Comments on Client Files (attach Client File Worksheet): | | | |
| | | | |

PROGRAM PERFORMANCE REVIEW

As part of the exit interview, and based on information obtained during the monitoring visit, discuss the following with the agency's Executive Director or other responsible staff:

| PROGRAM OBJECTIVES | YES | NO | COMMENTS |
|--|--------------------------|--------------------------|----------|
| Are all of the counties and/or municipalities in the agency's service area served equitably? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is the agency gathering and tracking all information needed to complete the CSBG program reports? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Are program outcomes sufficiently documented? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is the agency on track to meet the goals and objectives stated in the application and scope of work by the end of the contract period? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is the agency utilizing all of its current year performance measures in its service delivery area to measure outcomes? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is the agency fulfilling its responsibility to establish and maintain an effective internal control system to ensure that: <ul style="list-style-type: none"> a. appropriate goals and outcome measures are met b. resources are safeguarded c. rules and regulations are followed d. reliable data is obtained, maintained and fairly disclosed | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is the agency fulfilling its responsibility to use resources efficiently, economically and effectively to achieve the purposes for which the CSBG funding was provided? | <input type="checkbox"/> | <input type="checkbox"/> | |

| ROMA REPORTING | YES | NO | COMMENTS |
|--|--------------------------|--------------------------|----------|
| Has the agency received outcome/ROMA training from DCED and/or the Community Action Association of Pennsylvania? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Has the agency developed a system, or does the agency use the existing ROMA system, to provide a description of outcome measures to be used to measure performance in promoting self-sufficiency, family stability and community revitalization? | <input type="checkbox"/> | <input type="checkbox"/> | |

| GENERAL OPERATIONAL ISSUES | YES | NO | COMMENTS |
|--|--------------------------|--------------------------|----------|
| Are all client service locations, services provided and hours of operation accessible to persons with disabilities (to the extent feasible)? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Do the service locations provide all of the CAA's services? | <input type="checkbox"/> | <input type="checkbox"/> | |
| What are the hours of operation? | | | |
| Has the agency taken appropriate steps to address language barriers with the clientele in its service area? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Do the agency's policies for providing translation and interpretation meet the legal obligation to provide assistance to Limited English Proficiency (LEP) clients receiving or potentially receiving agency services? | <input type="checkbox"/> | <input type="checkbox"/> | |

SUBCONTRACTS (If Applicable)

| SUBCONTRACTORS | YES | NO | N/A | COMMENTS |
|--|-----|----|-----|----------|
| Does the agency subcontract for any of the services provided under the CSBG award? | C | C | C | |
| Total # of subcontracts during the grant period ____ | | | | |
| # of counties ____ municipalities ____ served | C | C | C | |
| Were all subcontracts identified in the contract available for review? | C | C | C | |
| Was a fully executed contract in place for all of the agency's sub-contractors? | C | C | C | |
| Do contracts for subcontracted services include a provision that the sub-contractor must follow State procurement requirements and the fiscal requirements of agency's contract with DCED? | C | C | C | |
| Are the amounts and activities of the subcontracts consistent with the descriptions in the contract? | C | C | C | |
| Is there evidence the agency monitors its subcontractors for contract compliance? How often are subcontractors monitored? _____ | C | C | C | |
| Were subcontractors conducting their contracted activities and maintaining adequate supporting documentation? | C | C | C | |
| Were funds used only for allowable expenses? | C | C | C | |
| If the agency utilized a subcontractor in the previous year, did the subcontractor meet its goals? If not, was corrective action taken? | C | C | C | |
| Did a subcontractor identify any concerns that could not be satisfactorily addressed by the CAA/DCED? | C | C | C | |
| If any services were subcontracted in addition to those identified in the contract, was prior approval given by DCED? | C | C | C | |
| Does the agency's method of selecting service providers for subcontracts ensure fair competition to all interested parties? | C | C | C | |
| Is there evidence that women and minority subcontractors were actively recruited? | C | C | C | |
| Does the agency have procedures in place to ensure that subcontractors have current insurance policies for blanket fidelity bond coverage; comprehensive general liability; directors and officers liability; umbrella excess liability; professional liability? | C | C | C | |
| Is there proof that subcontractors have insurance? | C | C | C | |
| If client/participant interviews were conducted, were the clients/participants satisfied with the subcontractor's service? | C | C | C | |
| Additional Comments on Sub-contractors/ Sub-grantees: | | | | |

PRIOR MONITORING

For the following, review previous monitoring reports and findings. If not satisfactorily resolved, list any unresolved findings in the current monitoring report.

| REVIEW OF PRIOR MONITORING REPORTS | YES | NO | N/A | COMMENTS |
|---|-----|----|-----|----------|
| Have all financial corrective action requirements from the previous monitoring reports been satisfactorily addressed? | C | C | C | |
| Have all programmatic corrective action requirements from the previous monitoring reports been satisfactorily addressed? | C | C | C | |
| Have all administrative corrective action requirements from the previous monitoring reports been satisfactorily addressed? | C | C | C | |
| Other than the annual independent audit, has the agency had any of its programs reviewed by representatives of other funding sources, such as Head Start <i>Prism</i> ? | C | C | C | |

ADMINISTRATIVE

| GENERAL | YES | NO | N/A | COMMENTS |
|--|-----|----|-----|----------|
| Does the agency maintain all issuances and memoranda regarding CSBG funding in a centralized file or notebook? | C | C | C | |
| Does agency staff have access to CSBG guidelines? | C | C | C | |

EXIT CONFERENCE

Identify strengths and best practices of the agency:

Notable follow-up points from agency pre-monitoring questionnaire:

Preliminary summary of findings and need for corrective action(s):

As a result of the monitoring visit, the following need(s) for training and/or technical assistance have been identified:

If appropriate, indicate a scheduled date for a follow-up, on-site visit to assess the implementation of corrective actions:

SIGNATURE

DCED PROGRAM SPECIALIST:

DATE:

Client File Worksheet

Project/ Program: _____

Subcontract Reviewed: ____ Yes ____ No

Number of Clients Served: _____

| Client Identifier | Signed Intake (Y or N) | Dated | Self-sufficiency Plan (Y or N) | Progress Notes (Y or N) | Meets Eligibility (Y or N) | Discharge/ Closure (Y or N) | Comments |
|-------------------|---------------------------|-------|-----------------------------------|----------------------------|-------------------------------|-----------------------------------|----------|
| | | | | | | | |
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| | | | | | | | |

Total Compliant Files: _____ Total Non-Compliant Files: _____

Overall Comments:



BOARD MEETING ATTENDANCE REPORT

GENERAL INFORMATION

| | | | | |
|---|--|---|-----------------------------|---------------------|
| AGENCY NAME: | | | CONTRACT NUMBER: | |
| DCED CSBG MONITOR/REPRESENTATIVE: | | | | |
| MEETING CALLED TO ORDER (DATE/TIME): | | | MEETING CALLED TO ORDER BY: | |
| MEETING CHAIRED BY: | | | | |
| CURRENT SIZE OF BOARD: | TOTAL BOARD MEMBERS PRESENT: | <input type="checkbox"/> Yes <input type="checkbox"/> No Were meeting notice, agenda, and minutes distributed prior to the meeting? | | HOW FAR IN ADVANCE: |
| <input type="checkbox"/> Yes <input type="checkbox"/> No Was attendance taken? | | NAME AND TITLE OF PERSON RESPONSIBLE FOR KEEPING ATTENDANCE RECORDS: | | |
| <input type="checkbox"/> Yes <input type="checkbox"/> No Was a quorum present at the meeting? | <input type="checkbox"/> Yes <input type="checkbox"/> No Were the minutes of the previous meeting reviewed and approved? | <input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, were corrections made to previous minutes? | | |

EXECUTIVE DIRECTOR'S REPORT

Presentation of report: ☐ Yes ☐ No

Highlights of report as presented:

Supplemental Reports:

Committee Reports: ☐ Yes ☐ No

Fiscal Report: ☐ Yes ☐ No

Organizational Standards Report: ☐ Yes ☐ No

Highlights:

PROGRAM SPECIALIST OBSERVATIONS/COMMENTS

Board member preparedness:

Meeting procedures followed:

Other comments:

☐ Yes ☐ No Was the prepared agenda followed?

TIME ADJOURNED:



COMMUNITY SERVICES BLOCK GRANT DESK REVIEW MONITORING TOOL

| GENERAL INFORMATION | |
|---|----------------------------------|
| AGENCY NAME: | CONTRACT NUMBER: |
| DCED CSBG MONITOR/REPRESENTATIVE: | |
| DATE OF REVIEW: | AGENCY STAFF INVOLVED IN REVIEW: |
| <input type="checkbox"/> Yes <input type="checkbox"/> No Was a CSBG Pre-Visit Questionnaire mailed out to the agency at least two weeks in advance of the scheduled review? | |
| <input type="checkbox"/> Yes <input type="checkbox"/> No Did the agency complete and return the questionnaire? | |

In preparation for the desk monitoring, review the agency's current contract file including log notes and correspondence to determine the following:

| REPORTING REQUIREMENTS | YES | NO | COMMENTS |
|---|--------------------------|--------------------------|----------|
| Is the agency submitting the Program Invoice forms on a timely basis? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is sufficient documentation submitted with each invoice to support the expenditures reported? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Are expenditures reported by the agency to date within the budgeted amounts by category per the contract? | <input type="checkbox"/> | <input type="checkbox"/> | |
| If reported expenditures exceed budgeted amounts by line item, has the agency requested an amendment to the original budget and/or provided adequate explanation for any significant variances? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is the agency on track to draw down the remaining balance of the award within the contract period? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Has the agency submitted required reports, including COPOS entries, on a timely basis? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is the agency participating in the ROMA system for measuring performance and results? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Based on the reports submitted to DCED, does the agency demonstrate that they understand national indicators? | <input type="checkbox"/> | <input type="checkbox"/> | |
| Regarding the Organizational Standards, what is the number of non-compliant indicators? _____ out of a possible _____ | | | |
| Please list non-compliant indicators, if applicable: | | | |

Review the agency's Board roster and the information provided by the agency on the CSBG pre-visit questionnaire, and interview appropriate agency staff and/or Board Members to complete the following:

| Elected Public Officials | Low-Income Representatives | Private Sector Representatives |
|--------------------------|----------------------------|--------------------------------|
| # of Seats: _____ | # of Seats: _____ | # of Seats: _____ |
| # of Vacancies: _____ | # of Vacancies: _____ | # of Vacancies: _____ |

| BOARD COMPOSITION | YES | NO | N/A | COMMENTS |
|---|--------------------------|--------------------------|--------------------------|----------|
| Is the composition of the board appropriate, e.g., at least 1/3 democratically elected representatives of low-income individuals and at least 1/3 elected officials or their representatives? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Does the agency have in place a tripartite board to administer its CSBG program? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Are election/selection procedures in accordance with agency by-laws and CSBG policy issuance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| BOARD GOVERNANCE SYSTEM | YES | NO | N/A | COMMENTS |
|---|--------------------------|--------------------------|--------------------------|----------|
| Are all three sectors of the Tripartite Board represented in accordance with Federal legislation and the Community Action Agency's by-laws? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Has agency ensured there are no vacancies in board membership, both overall and by sector? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Are board meetings conducted at least quarterly? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Do the minutes list board members in attendance at board meetings and other guests present? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is there evidence in the minutes that the board receives programmatic and financial information relating to CSBG and all other programs? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Did the review of the minutes support that the board fully participated in the development, planning, implementation, and evaluation of the CSBG program? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Do the minutes accurately reflect the actions taken at board meetings, including the exact wording of motions? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Does the board follow the by-laws for such issues as board membership, removing board members for lack of attendance, etc.? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is the board active and engaged in fulfilling the mission of the agency? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is the board a true policy-making body, or does the board wander into operational or procedural matters (micro-managing the agency)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Does the board actively set policy or does it just endorse the Executive Director's plans? | | | | |
| Do the by-laws include selection procedures for members of the board? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Do the by-laws define the officer positions, selection process and terms of service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Are there term limits for all board members? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Do the by-laws contain a definition of a quorum? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| | | | | |
|--|---|---|---|--|
| Are the provisions for the removal of a member explained in the by-laws? | C | C | C | |
| Are there clear procedures for filling a vacancy on the board? | C | C | C | |
| Are board meetings open to the general public? (Other than confidential matters) | C | C | C | |
| Are meeting notices published in the local media? How far in advance? | C | C | C | |
| Are the procedures for hiring, supervising, evaluating and dismissing an Executive Director clearly outlined in the by-laws? | C | C | C | |
| Are Robert's Rules of Order followed for all board meetings? | C | C | C | |
| Is there a section of the by-laws dealing with the compensation of board members? | C | C | C | |
| List of Committees as Outlined in the by-laws: | | | | |

| | | | |
|--|---|---|--|
| Does the agency have a Tripartite Board in place to oversee its CSBG programs? | C | C | |
| Does DCED have a copy of the most recent board roster? Include date in comments. | C | C | |
| Does the Board roster include the name, title, address, sector represented, date appointed or elected, and term expiration date for all board members? | C | C | |
| Do representatives of low-income persons reside in the neighborhood from which they were elected? | C | C | |
| Have either public or low-income sector board seats remained vacant for more than 90 days? | C | C | |
| Does DCED have a copy of the most current by-laws? | C | C | |
| Is there a Code of Ethics for the board? | C | C | |
| Is the mission statement in the agency's Board Manual? | C | C | |
| Does the board approve the agency's annual budget? Include date of minutes showing approval in comments. | C | C | |

| | | | |
|--|---|---|--|
| Does the board approve the agency's policies? | C | C | |
| Do board members receive ROMA training? | C | C | |
| What is the date of the last ROMA training meeting conducted for the board? | | | |
| Does the board have committees structured to fully address its fiduciary and governance responsibilities? Please list the standing committees: | C | C | |
| Does the board have an adequate system for the orientation of new board members? | C | C | |

Review the minutes of several of the agency's recent board meetings to determine the following:

| BOARD MEETINGS AND MINUTES | YES | NO | COMMENTS |
|---|-----|----|----------|
| How often does the Tripartite Board meet? | | | |
| Are the regular board meetings open to the public? | C | C | |
| Has DCED been provided with a schedule of board meeting dates? | C | C | |
| What is the date of the most recent board meeting attended by the Program Specialist? | | | |
| Have all board minutes been submitted to DCED? | C | C | |
| Do the minutes list the board members in attendance & absent? | C | C | |
| Is there a quorum present at all meetings? | C | C | |
| Do the minutes indicate that the board members are aware of their roles and responsibilities with regard to the CSBG program? | C | C | |
| Are financial reports communicated regularly to the agency's board and policy groups? | C | C | |
| Is the board provided with current financial information? | C | C | |
| Is there evidence in the minutes that the board uses community needs and service gap analysis to establish service priorities and adopt program objectives? | C | C | |
| Do the minutes indicate that the agency's board fully participates in the development, planning, implantation and evaluation of the CSBG program? | C | C | |
| Does the board monitor staff development/training needs, plans and outcomes? | C | C | |
| Does the board monitor program performance by comparing outcome goals to outcomes achieved? | C | C | |
| Does the board evaluate major programs every three years, including regulatory compliance and outcome analysis? Tools/approach used? | C | C | |
| Additional comments on the board: | | | |

Based on the agency's operations and the updated information gathered during the current review, assess the agency staff assigned to CSBG program:

| PERSONNEL | YES | NO | COMMENTS |
|--|-----|----|----------|
| Does the agency have adequate staff assigned to administer the CSBG program activities effectively and efficiently? | C | C | |
| Did agency staff involved in the review demonstrate knowledge of CSBG program guidelines and procedures? | C | C | |
| Has the agency experienced recent turnover in staff assigned to administer the CSBG program? | C | C | |
| Are all staff positions identified in the CSBG Contract application, and any amendments thereto, filled? | C | C | |
| Are all staff members performing the duties described in the job descriptions submitted when the CSBG contract was negotiated? | C | C | |

PROGRAM PERFORMANCE REVIEW

Based on information obtained during the review, discuss the following with the agency's Executive Director or other responsible staff:

| PROGRAM OBJECTIVES | YES | NO | COMMENTS |
|--|-----|----|----------|
| Are all of the counties and/or municipalities in the agency's service area served equitably? | C | C | |
| Is the agency gathering and tracking all information needed to complete the CSBG program reports? | C | C | |
| Are program outcomes sufficiently documented? | C | C | |
| Is the agency on track to meet the goals and objectives stated in the application and scope of work by the end of the contract period? | C | C | |
| Is the agency utilizing all of its current year performance measures in its service delivery area to measure outcomes? | C | C | |
| Is the agency fulfilling its responsibility to establish and maintain an effective internal control system to ensure that: <ul style="list-style-type: none"> a. appropriate goals and outcome measures are met b. resources are safeguarded c. rules and regulations are followed d. reliable data is obtained, maintained and fairly disclosed | C | C | |
| Is the agency fulfilling its responsibility to use resources efficiently, economically and effectively to achieve the purposes for which the CSBG funding was provided? | C | C | |

| ROMA REPORTING | YES | NO | COMMENTS |
|--|-----|----|----------|
| Has the agency received outcome/ROMA training from DCED and/or the Community Action Association of Pennsylvania? | C | C | |
| Has the agency developed a system, or does the agency use the existing ROMA system, to provide a description of outcome measures to be used to measure performance in promoting self-sufficiency, family stability and community revitalization? | C | C | |

| GENERAL OPERATIONAL ISSUES | YES | NO | COMMENTS |
|--|-----|----|----------|
| Are all client service locations, services provided and hours of operation accessible to persons with disabilities (to the extent feasible)? | C | C | |
| Do the service locations provide all of the CAA's services? | C | C | |
| What are the hours of operation? | | | |
| Has the agency taken appropriate steps to address language barriers with the clientele in its service area? | C | C | |
| Do the agency's policies for providing translation and interpretation meet the legal obligation to provide assistance to Limited English Proficiency (LEP) clients receiving or potentially receiving agency services? | C | C | |
| Additional Comments: | | | |

SUBCONTRACTS (If Applicable)

| SUBCONTRACTORS | YES | NO | N/A | COMMENTS |
|--|--|--|--|----------|
| Does the agency subcontract for any of the services provided under the CSBG award? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Total # of subcontracts during the grant period _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| # of counties _____ municipalities _____ served | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were all subcontracts identified in the contract available for review? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Was a fully executed contract in place for all of the agency's sub-contractors? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Do contracts for subcontracted services include a provision that the sub-contractor must follow State procurement requirements and the fiscal requirements of agency's contract with DCED? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Are the amounts and activities of the subcontracts consistent with the descriptions in the contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is there evidence the agency monitors its subcontractors for contract compliance? How often are subcontractors monitored? _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were subcontractors conducting their contracted activities and maintaining adequate supporting documentation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Were funds used only for allowable expenses? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| If the agency utilized a subcontractor in the previous year, did the subcontractor meet its goals? If not, was corrective action taken? | <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> | |
| Did a subcontractor identify any concerns that could not be satisfactorily addressed by the CAA/DCED? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| If any services were subcontracted in addition to those identified in the contract, was prior approval given by DCED? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Does the agency's method of selecting service providers for subcontracts ensure fair competition to all interested parties? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is there evidence that women and minority subcontractors were actively recruited? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Does the agency have procedures in place to ensure that subcontractors have current insurance policies for blanket fidelity bond coverage; comprehensive general liability; directors and officers liability; umbrella excess liability; professional liability? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Is there proof that subcontractors have insurance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| If client/participant interviews were conducted, were the clients/participants satisfied with the subcontractor's service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Additional Comments on Sub-contractors/ Sub-grantees: | | | | |
| | | | | |

PRIOR MONITORING

For the following, review previous monitoring reports and findings. If not satisfactorily resolved, list any unresolved findings in the current monitoring report.

| REVIEW OF PRIOR MONITORING REPORTS | YES | NO | N/A | COMMENTS |
|---|-----|----|-----|----------|
| Have all financial corrective action requirements from the previous monitoring reports been satisfactorily addressed? | C | C | C | |
| Have all programmatic corrective action requirements from the previous monitoring reports been satisfactorily addressed? | C | C | C | |
| Have all administrative corrective action requirements from the previous monitoring reports been satisfactorily addressed? | C | C | C | |
| Other than the annual independent audit, has the agency had any of its programs reviewed by representatives of other funding sources, such as Head Start <i>Prism</i> ? | C | C | C | |

PERSONNEL POLICIES AND PRACTICES

Obtain and review a copy of the agency's personnel policies and procedure to determine the following:

| GENERAL PERSONNEL POLICIES & PROCEDURES | YES | NO | N/A | COMMENTS |
|--|-----|----|-----|----------|
| Does the agency have written personnel policies and procedures? | C | C | C | |
| Is there a provision in the personnel policies to prohibit conflict of interest and nepotism? | C | C | C | |
| Do personnel policies correctly address partisan activities? | C | C | C | |
| Is there a provision to provide equal opportunity and prohibit discrimination on the basis of race, color, religion, sex, national origin, age, handicap, political affiliation or belief? | C | C | C | |
| Do personnel and EEO policies address a system by which discrimination complaints will be resolved? | C | C | C | |
| Is there a provision to prohibit political activity or lobbying? | C | C | C | |
| Is there a provision insuring that any person reporting a violation by the Community Action Agency shall not be discriminated against? (<i>Whistle-Blower Policy</i>) | C | C | C | |
| Do the agency's whistleblower policies inform employees of their rights to disclose information to the proper authorities? | C | C | C | |
| Does the agency whistleblower policy contain the telephone numbers of the Pennsylvania Auditor General and the Office of the Pennsylvania Attorney General? | C | C | C | |
| Does the Agency have written drug-free Workplace policies? | C | C | C | |
| Does the Agency have written ADA compliance policies? | C | C | C | |
| Are the Agency's facilities smoke-free environments? | C | C | C | |
| Is the Agency compliant with the Child Support Services Assurances? | C | C | C | |
| Do personnel policies state that the Community Action Agency may employ no board member during his/her service on the board, or for a period of twelve months thereafter? | C | C | C | |
| Comments: | | | | |

ADMINISTRATIVE

| GENERAL | YES | NO | N/A | COMMENTS |
|--|-----|----|-----|----------|
| Does the agency maintain all issuances and memoranda regarding CSBG funding in a centralized file or notebook? | C | C | C | |
| Does agency staff have access to CSBG guidelines? | C | C | C | |

Obtain and review a copy of the agency's by-laws to address the following:

| BY-LAWS | YES | NO | N/A | COMMENTS |
|---|-----|----|-----|----------|
| How many Board members do the by-laws specify? | | | | |
| How often is the board required to meet? | | | | |
| What is the date the board last reviewed the by-laws? | | | | |
| Does DCED have a copy of the CAAs most recent by-laws? | C | C | C | |
| Do the by-laws specify a method for selection that is appropriate for each board sector? | C | C | C | |
| Do the by-laws contain an acceptable limitation on board service for representatives of the private and poverty sectors? | C | C | C | |
| Do the by-laws address non-discrimination policies? | C | C | C | |
| Do the by-laws state that decisions made in closed session must be finalized in a meeting open to the public? | C | C | C | |
| Do the by-laws state that written minutes of all open meetings shall be kept? | C | C | C | |
| Do the by-laws state that written advance notice, including an agenda, shall be given to the Board members 5 days in advance of board meetings? | C | C | C | |
| Do the by-laws state that public notices shall be posted at least 72 hours prior to the time of the meeting? | C | C | C | |
| On what date were the Agency's by-laws were last amended by the board? | C | C | C | |
| Is there a written policy outlining the process for amending the by-laws? | C | C | C | |
| How often are the by-laws reviewed by the board? | | | | |
| Comments On By-laws: | | | | |

FINDINGS OR CONCERNS

Identify strengths and best practices of the agency:

Note follow-up points from the agency's Pre-Monitoring Questionnaire:

Preliminary summary of findings and need for corrective action(s):

As a result of the review, the following need(s) for training or technical assistance have been identified:

If appropriate, indicate a scheduled date for a follow-up, on-site visit to assess the implementation of corrective actions:

SIGNATURE

DCED PROGRAM SPECIALIST:

DATE:



Department of Community &
Economic Development

CENTER FOR COMMUNITY SERVICES

Title: Management of WAP/CSBG Property

Directive #: CW2016-02

Effective: July 1, 2016

To: Weatherization and CSBG Subgrantees

From: Lynette Praster, Director – Center for Community Services

1.0 Purpose:

To establish procedures and policy regarding the purchase, management, transfer, disposition, and documentation of Weatherization Assistance Program (WAP)(DOE and LIHEAP) and Community Services Block Grant (CSBG)- funded vehicles, equipment, and material inventory.

2.0 Background:

WAP: The following polices are based on Title 10 of the Code of Federal Regulations, Part 600, hereafter referred to as 10 CFR 600. In addition, OMB Circular 2 CFR Chapter I, II, Part 200, 215, 220, 225 and 230. The WAP federal statutes, regulations, rules and directives are available online through the WAP Technical Assistance Center at www.waptac.org.

CSBG: The following procedures are based and in accordance with 45 CFR Part 74, OMB Circular 2 CFR Chapter I, II, Part 200, 215, 220, 225 and 230 as revised by the U.S. Department of Health and Human Services CSBG Information Memorandum No. 60, "Duties and Interests with Respect to Property Purchased, Constructed or Improved by an Eligible Entity Using Block Grant Funds Provided Under Public Law 105-285 Section 678(a)(1)&(2) Limitation on Use of Funds and the Secretary's Right to Waive the Prohibition. The CSBG federal statutes, regulations, rules and directives are available online at <http://www.acf.hhs.gov/programs/ocs/programs/csbgs>.

3.0 Policy/Procedure:

A. Purchase:

All purchases must be made in accordance with the Procurement, Bidding and Subcontracting Directive.

For the WAP, when a purchase is being considered or something of value is no longer needed for use in WAP or any other federal program, a description and FMV of the item/s should be sent to the weatherization mailbox at ra-wxmail@pa.gov.

The Center for Community Services (CCS) requires that all WAP and CSBG subgrantees receive written permission from CCS to purchase any property with an aggregate cost of

\$5,000 or more. For CSBG, a waiver is needed for construction or improvement of real property.

Once a vehicle is approved and purchased, the following steps must be followed:

1. Vehicle title is to be taken in the name of the subgrantee
2. First lien is to be assigned to the Department of Community and Economic Development (DCED)
3. Original Certificate of Title is to be submitted to the Center for Community Services (CCS)

B. Management:

Property is defined as any vehicle, equipment, or material inventory assigned to a program managed by Pennsylvania's CCS, hereafter referred to as "Property" for the purposes of this Directive.

Property with a unit purchase cost of \$1,000 or more must be recorded and a list provided to CCS electronically on an annual basis. **This WAP/CSBG Property Workbook is due by the last business day of February for the prior calendar year (January 1-December 31).** All property purchased with WAP/CSBG funds must be identified with a DCED identification tag, which can be acquired from CCS upon request.

Material Inventory purchased with WAP/CSBG funds must be documented if the aggregate Fair Market Value (FMV) at the end of the contract is \$5,000 or over. The cover page of the WAP/CSBG Property Workbook provides a place to report the total amount of Material Inventory. CCS may require more information about the Material Inventory upon review.

Internally, each subgrantee must maintain an additional a list of property purchased in whole or in part with WAP or CSBG funds with an acquisition cost from \$300 up to \$1,000 or as identified on the WAP/CSBG Property List in order to accurately track all purchases. This list is provided in the WAP/CSBG Property Workbook for your convenience.

C. Inventory Control:

The Center for Community Services requires that all Weatherization and CSBG subgrantees maintain a property inventory that identifies all property purchased with federal funds (DOE, CSBG, LIHEAP, etc). The Workbook for tracking the property will be supplied by the Center for Community Services.

Please see Management section B. for Material Inventory instructions. The Property Workbook should be updated throughout the contract period as purchases, disposals, and transfers are made.

In addition, for any disposal and/or transfer of property a State and Federal Inventory

Disposal and Transfer Record an attachment to the Directive.

D. Disposition of Property:

Subgrantees may choose the means by which they manage the disposition of their Weatherization and/or CSBG property.

Property may be retained within a currently funded and active program. This method of property management only applies to property assigned to a program that continues to be funded and remains active. Property that is assigned to a program that will not continue to be funded and active must be removed from that program, and should be managed according to the following six priority methods below. Subgrantees must receive permission from CCS to transfer, sell, donate, or discard any property with a Fair market Value of \$5,000 or above which cannot be retained within its current program.

For WAP funded property, the item should have been listed on the Weatherization Extranet prior to considering transfer. Details and FMV must be submitted to ra-wxmail@pa.gov.

1. Property must be removed and managed according to the following:
 - i. Transferred within a subgrantee for use in an active WAP/CSBG funded program, respectively.
 - ii. Transferred within a subgrantee for use in an active federally-funded program with the understanding that if the property is needed by another subgrantee for use in their active WAP or CSBG programs that the property could be moved for use in the program for which it was originally intended
 - iii. Utilized (including rented or leased) for a non-federal program (including all utility, for-profit, federally-supported for-profit loan, federally-supported private, or private programs), regardless of whether the non-federal program is administered by the subgrantee.
 - 1) Subgrantees must receive permission from CCS to utilize any property for a non-federal program. Subgrantees must submit written requests for permission that include:
 - a) Subgrantee name
 - b) Property to be used by other program
 - c) Actively funded program to which the property is assigned
 - d) Original purchase price of property
 - e) Proposed program or activity to which property will be rented or leased, including specific details like the name of the program, funding source, type of program (non-federal or for-profit), etc.
 - f) A statement that utilizing the property will not interfere with the originally intended program activities
 - g) If property is utilized for programs administered by the subgrantee, a plan for sharing costs and how the costs will be documented. For example, include details on a lease or rental agreement, a utility

contract, a leveraging plan, how time sheets or mileage logs reflect dual usage, and how material costs will be repaid, if necessary

- h) If property is to be utilized on for-profit activities, a statement which indicates that services provided for a fee will not compete unfairly with private companies that provide equivalent services
 - i) Any further details required by CCS upon request.
 - 2) To use this method of property management, the property must be available for use in an active WAP/CSBG or federally-funded program.
 - 3) Any funds acquired by a subgrantee through rent, lease, or other fees in the utilization of property by a non-federal program must be treated as program income in accordance with 2 CFR Part 200. More information regarding program income is also provided in the Master Agreement under the Payment Provisions and Fiscal Responsibilities section.
 - a) Program Income must be counted as funds for use within the funding source in which the item was purchased.
 - b) For WAP, Program Income must be spent in the Direct Services budget categories of Program Operations, Program Support or Health and Safety to weatherize more units.
 - c) For CSBG, Program Income must be spent to supplement incurring program expenditures that further CSBG objectives.
 - (1) Program Income is not added to the agency contract budget but must be reported on the agency monthly Financial Status Report.
 - (2) Program Income must be expended prior to drawing additional CSBG funds and within the program year in which the funds were earned.
 - d) For WAP, a request to CCS must be made to add Program Income to the agency HES budget as a separate budget category within the appropriate funding source and will be labeled as Program Income.
 - (1) Program Income is not added to the agency contract budget but must be reported on the agency monthly Financial Status Report.
 - (2) Program Income must be expended prior to drawing additional WAP funds and within the program year in which the funds were earned.
2. Sold to a non-federal program and/or to a for-profit entity.
- i. Subgrantees must receive permission from CCS to sell any property with a fair market value of \$5000 or more. Subgrantees must submit written requests for permission that include:
 - a) Subgrantee Name
 - b) Vehicle or equipment to be sold
 - c) List of all material inventory to be sold

- d) Date of original purchase of property
- e) Original funding source for purchase of property
- f) Funding Source currently assigned to property
- g) Original purchase price of property
- h) Fair Market Value (FMV, defined in Section 3, D, 4, ii) of property
- i) Method of determining the FMV
- j) Proposed Method of Sale, in accordance with Proper Sale Procedures (defined in Section 3, D, 4, iii)
- ii. Fair Market Value (FMV)
 - a) According to the Internal Revenue Service (see the below link in Section 6, Attachments and Resources), "Fair market value is the price that property would sell for on the open market. It is the price that would be agreed on between a willing buyer and a willing seller, with neither being required to act, nor both having reasonable knowledge of the relevant facts."
 - b) The following suggestions are some but not all potential options for determining FMV; however, subgrantees are responsible for determining FMV according to the above definition regardless of whether the following methods adequately meet the definition.
 - 1. Obtain three quotes from three separate reputable vendors listing their current sale price for the property.
 - 2. Obtain three sale prices from public auction websites such as eBay, Craigslist, Amazon dealers or retail stores.
 - a) For all property, COSTARS may not be used to determine FMV because it achieves artificially low prices through negotiated pricing.
 - b) For vehicles, subgrantees may also obtain three sale prices from public online vehicle sale vendors such as Vehix, Edmunds, or CarsDirect.
 - c) For vehicles, Kelley Blue Book may only be used to determine FMV if the vehicle does not have any customized features installed.
- iii. Proper Sale Procedures
 - a) Proper sales procedures must be established which provide for competition to the extent practicable and result in the highest possible return.
 - b) A record of the sale must be documented in the subgrantee's financial records.
- 3. Donated to a charitable organization.
 - i. Subgrantees must receive permission from CCS to donate any property with a value of \$5000 or more. Subgrantees must submit written requests for permission that include:
 - a) Subgrantee Name
 - b) Vehicle or equipment to be donated
 - c) List of all material inventory to be donated

- d) Organization to which property is donated
 - e) Date of original purchase of property
 - f) Funding Source assigned to property
 - g) Original purchase price of property
 - h) FMV of property
 - i) Method of determining the FMV
 - ii. Documentation of Donated property
 - a) For property with an FMV less than \$5000, subgrantees must document the method used for determining the FMV.
 - b) Receipt or acknowledgment of all donations must be kept within the transaction record.
- 4. Discarded.
 - i. Property that is to be discarded must have little to no value.
 - ii. Documentation of Discarded property
 - a) FMV must be determined to be very low and the method for determining the FMV must be documented.
 - b) If applicable, subgrantees must acquire a receipt from the site of disposal and must retain the receipt within the transaction record.
- B. Prioritization for disposition of property that can no longer be used for the program for which it was purchased:
 - 1. If the property's purchase price or FMV is **less than \$5000**, subgrantees must prioritize their property disposition according to the following order:
 - i. Subgrantees must use property for activities sponsored by WAP or CSBG funds.
 - ii. Subgrantees must use property for activities sponsored by other federal funds.
 - iii. Subgrantees may discuss the disposition decisions of property valued less than \$5000 with CCS, and CCS may require subgrantees to dispose of any property according to CCS's discretion (particularly to ensure property availability across the Commonwealth via the Weatherization Extranet).
 - 2. If the property's FMV is **\$5000 or more**, subgrantees must prioritize their property disposition according to the following order:
 - i. Subgrantees must use property for activities sponsored by the original purchasing program of WAP or CSBG.
 - ii. Subgrantees must use property for activities sponsored by other federal funds. Subgrantees must discuss and submit written request to CCS for all disposition decisions of property with this value.
- C. WAP/CSBG Property Workbook
 - 1. The attached WAP/CSBG Property Workbook (Workbook) is the primary means by which subgrantees record all property ownership and program change transactions.
 - 2. Subgrantees must follow all instructions and fully complete the Workbook.
 - 3. Subgrantees must maintain and continually update the Workbook.
 - 4. CCS reserves the right to request completed Workbook at any time.

4.0 Notations:

This directive shall supersede and replace in entirety the following directive:

- *Directive CW2014-02, Management of WAP_CSBG Property*

5.0 Effective Date:

This directive shall take effect July 1, 2016 and supersedes previous directives. It shall remain in effect, in its entirety, until such time as it is amended, replaced, superseded, or nullified. Only a directive from the Center for Community Services may countermand any statement herein contained.

6.0 Attachments and Resources:

- Weatherization/CSBG Property Workbook
- State and Federal Inventory Disposal and Transfer form
- Selecting Fair Market Value: <http://www.irs.gov/publications/p561/ar02.html#d0e139>

cc: Center for Community Services
Financial Management Center



Department of Community &
Economic Development

CENTER FOR COMMUNITY SERVICES

Title: Annual Financial Reconciliation Report
Requirements

Directive #: CW2016-03

Effective: July 1, 2016

TO: Weatherization and Community Service Block Grant (CSBG) Subgrantees

FROM: Lynette Praster, Director - Center for Community Services

1.0 Purpose:

Subgrantees are required to demonstrate that program funds were spent in accordance with program requirements and guidelines. This directive will advise subgrantees of the Annual Financial Reconciliation Report of Federal Funds to account for funds received compared to program expenditures.

2.0 Background:

DCED is required to reconcile program funds with requested payments annually to U.S. Department of Health and Human Services (HHS), the U.S. Department of Energy (DOE) and the PA Department of Human Services (DHS). DCED must receive the reconciliations from the subgrantees in a timely manner as part of the preparation of annual reports.

3.0 Policy:

WEATHERIZATION

The Annual Financial Reconciliation Reports will be due to DCED no later than 45 calendar days after the termination of the program year. These reports must be submitted to the weatherization resource email account at ra-wxmail@pa.gov. Failure to comply may result in the subgrantee being flagged for future funding until such time as the required reports are received. The Annual Financial Reconciliation form and instructions can be found on <https://collab.pa.gov/dced/weatherization>.

Final invoices and FSRs must be submitted in accordance with FMC Directive 2014-01(2) Federal Program Invoices and Fiscal Status Reports.

If the completed Financial Reconciliation ends up with unspent funds which have already been drawn down, those funds must be returned to DCED. The check should be made out to the Commonwealth of PA and must identify the funding source, the budget category/ies it was unspent in, and the contract in which the funds were awarded. Please submit to the following address:

Commonwealth Keystone Building
Department of Community & Economic Development
Center for Community Services
400 North Street, 4th Floor
Harrisburg, PA 17120

Subgrantees that plan to terminate their Weatherization program must notify DCED at least 60 calendar days prior to termination. The agency will receive further instructions at that time.

CSBG

Subgrantees must submit their annual COPOS report within 45 calendar days of the termination of the calendar year. Failure to comply may result in the subgrantee being flagged for future funding until such time as the required reports are received.

The COPOS report and instructions for completing and submitting online can be found at www.pa-copos.org.

Final invoices and FSRs must be submitted in accordance with FMC Directive 2014-01(2) Federal Program Invoices and Fiscal Status Reports.

4.0 Notations:


This directive shall supersede and replace in entirety the following directives:

- *Directive CW2014-03, Annual Federal Grant Closeout Requirements*

5.0 Effective Date

It shall remain in effect, in its entirety, until such time as it is amended, replaced, superseded, or nullified. Only a directive from the Center for Community Services or equivalent office may countermand any statement herein contained.

Cc: Center for Community Services
Financial Management Center

| | |
|---|---|
|  <p>Department of Community & Economic Development</p> | <p>CENTER FOR COMMUNITY SERVICES</p> <p>Title: Taxation of Materials Directive #: CW2016-04 Effective: February 19, 2016</p> |
|---|---|

TO: Weatherization Assistance Program (DOE & LIHEAP) & Community Services Block Grant (CSBG)

FROM: Lynette Praster, Director - Center for Community Services

1.0 Purpose

To clarify the payment of sales taxes on materials, machinery and equipment purchased for use in the both Weatherization Assistance and CSBG Programs.

2.0 Background

The PA Department of Revenue (DOR) has determined that, except for certain conditions, purchases of materials, equipment and machinery for use in the Weatherization Assistance and CSBG Programs is taxable.

3.0 Policy

The Pennsylvania Department of Revenue has made the following determinations:

Organizations that purchase weatherization materials and supplies and perform weatherization services are governmental entities, "charitable" organizations with a PA "75" exempt number, or private contractors performing weatherization services for governmental entities or charitable organizations.

The different types of property/materials purchased for the weatherization measures and CSBG activities lead to different taxability results depending on the purchaser and whether the property qualifies as "building machinery and equipment" under Section 7201 (pp) of the Tax Reform Code of 1971.

PA Weatherization and CSBG subgrantees must adhere to the following guidelines for purchasing materials and equipment as it relates to the payment of taxes:

- Government entities, if purchasing the property/materials directly, would be exempt on all purchases.
- Charitable organizations with a "75" exempt number may only purchase building machinery and equipment tax free. This would include furnaces. Windows, doors, insulation and weather strips are taxable.
- Private contractors for either of these entities would only be exempt on their purchases of building machinery and equipment, which again would include furnaces. Windows, doors, insulation, or weather strips would be taxable.

For clarification purposes, the "75 exempt number" is an exemption number issued by the DOR to charities, churches, non-profit schools or volunteer fire companies who have applied with the Department of Revenue and met the requirements for "institution of purely public charity". It allows these entities to buy certain property and services free of sales tax. It is called a "75" number as it is an eight digit number beginning with the two digits "75".

4.0 Notations

This directive shall supersede and replace in entirety the following directive:

- *Directive #2009-01, Taxation of Weatherization Materials (WAP)*
- *Directive #CW2014-04, Taxation of Weatherization Materials (WAP)*

5.0 Effective Date

This directive shall take effect immediately and shall remain in effect, in its entirety, until such time as it is amended, replaced, superseded, or nullified. Only a directive from the Center for Community Services or equivalent office may countermand any statement herein contained.

Cc: Center for Community Service
Financial Management Center



Department of Community & Economic Development

FINANCIAL MANAGEMENT CENTER

Title: Federal Program Invoices & Fiscal Status Reports for Weatherization grants and Community Service Block grants

Directive # 2014-01 (2)

Effective: April 4, 2016

To: All Weatherization and Community Service Agencies

From: Kevin M. Rowland, DCED, Chief Financial Officer

1.0 Purpose

This directive is to provide the procedure for the submission of invoices and fiscal status reports and to establish enforcement parameters associated with said submission requirements for the Community Services Block Grant (CSBG) and Weatherization federal funds passed through the Department of Community and Economic Development (DCED).

2.0 Revision History

This Financial Management Center (FMC) Directive replaces, in its entirety, FMC Directive 2014-01, last updated on August 8, 2014. This directive applies to all CSBG and Weatherization requests for funds.

3.0 Policy

Federal program invoices and fiscal status reports (FSRs) are used to capture additional funding information regarding specific federal program funds. The invoice form requires the provision of specific budgetary and expenditure information related to your monthly expenses. Similarly, the fiscal status report provides supplemental information relating to your actual monthly expenditures.

In order to strengthen DCED's accountability for its pass-through Federal funds, invoices and FSRs will be required to be submitted by the 20th of each month. Both invoices and FSRs will be required on a monthly basis. However, invoices must be \$500 or greater to be considered for processing. Invoices totaling less than \$500 will not be processed, unless it is a request for final payment on an individual contract. Please note that the agency must provide justification in the FSR notes section if they are not submitting an invoice in a particular month (i.e. due to the \$500 threshold, etc.). In addition, agencies are not required to submit a 'zero dollar' invoice. Again, the agency MUST provide justification in the FSR notes section if they are not submitting an invoice in a particular month. Should an agency fail to submit these forms by the required monthly timeframes, the agency's current or future funding may be affected. Agencies will be sent notification (via an email) in writing, should their funding become affected.

All invoices and FSRs must be submitted to DCED electronically (via email). Please identify the associated contract number in the subject line of your email. Agencies may attach both the invoice and FSR in the same email and should be submitted to the following address:

RA-DCEDInvoicing@pa.gov

Once DCED receives the invoice and FSR, they will be reviewed and processed in the order in which they are received. DCED encourages early submission of invoices. DCED may reject the invoice or FSR if either form is incomplete or incorrect. The agency will be sent notification (via an email) with a reason for rejection and is asked to respond within five business days to the request as outlined in the email notification. If DCED does not receive a timely response, the agency's current or future funding may be affected.

It is important to note that the initial review performed by DCED on any given invoice or FSR does not constitute acceptance of its associated expenditures. DCED's Compliance Monitoring Division will conduct a comprehensive review during the contract period to ensure eligibility of all related expenditures.

Requests for payment submitted on forms other than the most recently revised invoice will not be accepted and will be returned. Likewise, any fiscal status report submitted on forms other than the most recently revised fiscal status report will not be accepted and will be returned. Please make sure that the invoice and fiscal status report are completed in their entirety and that **all** information is provided. Failure to comply with this directive will delay processing of invoices and payments of associated federal funds.

4.0 Procedure

Effective with the issuance of the fiscal year 2013-2014 contracts (referred to as the Master Agreement), agencies will be required to use the recently revised DCED Invoice and Fiscal Status Report (FSR). These revised invoices and FSRs, along with instructions, will be available to download at www.newpa.com/qaos and will not be emailed to the agencies. This is to ensure that all agencies are using the most up-to-date forms and that no changes can be made to the DCED issued forms.

When completing these forms, the approved budget amounts should be the current fiscal year allocation amounts from your most recent approved budget modification or funding release form. If a budget modification is "in process," please do not list the new budget totals until you have received final approval. In addition, DCED will reject any invoice that has a negative balance in any major category. In these circumstances, the agency will need to request a budget modification, which must be approved, before submitting the invoice.

These forms, located on the DCED website, will be fillable and savable forms. In addition, when completing the invoice or FSR, please be sure to report all amounts in whole numbers. Once completed, print the forms, attach signature, scan and attach to an email for submission to DCED.

The initial invoice should be completed and submitted at the time of receiving the first signed funding release form. Subsequent invoices and fiscal status reports will be due each month following, no later than the 20th of the month. Please note that a final FSR may be required one month after submission of the final invoice to provide reconciliation of final expenditures.