

COMMUNITY SERVICES BLOCK GRANT

Program Guidelines | December 2017

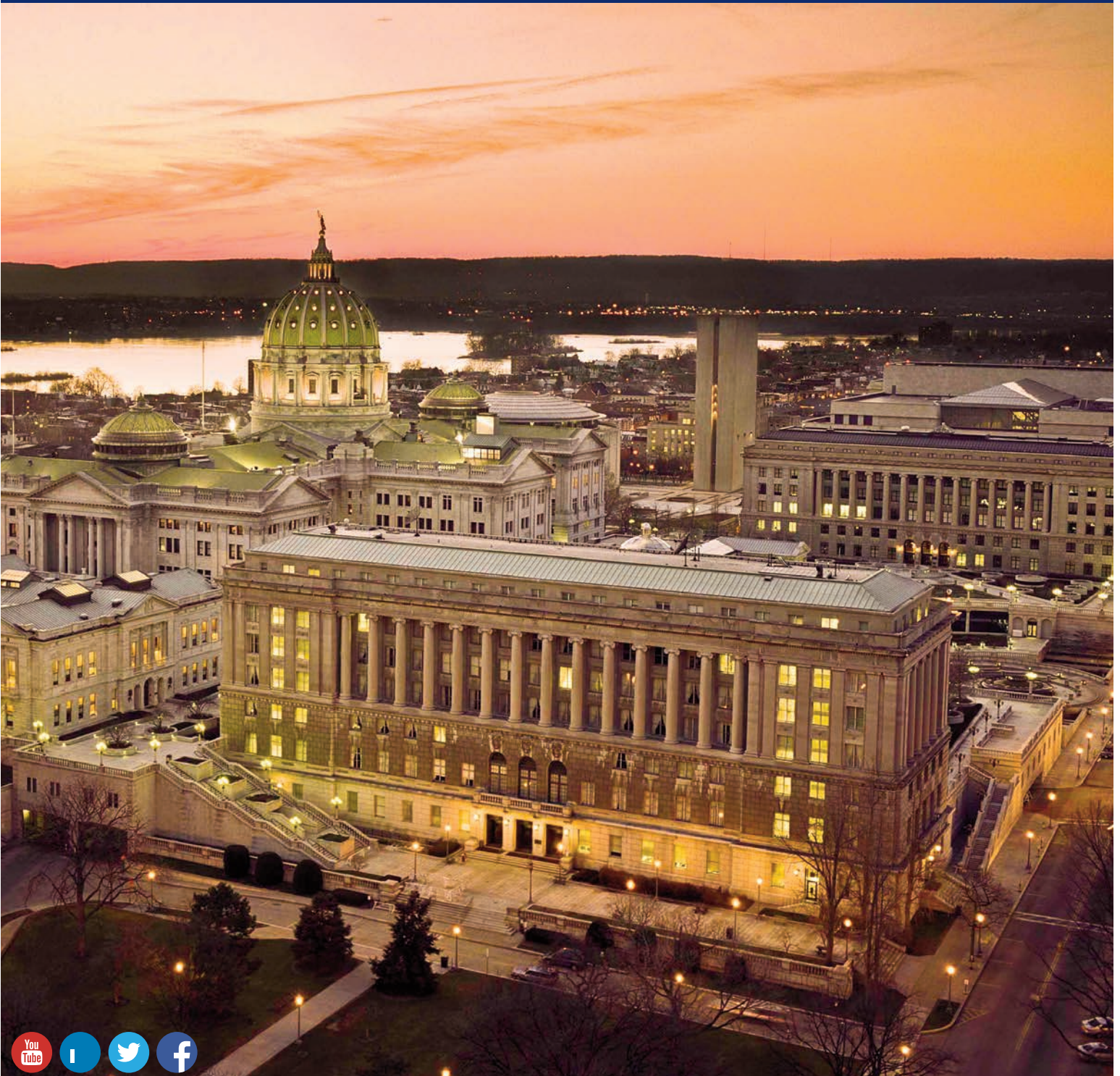


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Section I – Background

The Community Services Block Grant (CSBG) is authorized by the Community Opportunities, Accountability, and Training Educational Services Human Services Reauthorization Act of 1998, Public Law 105-285, October 27, 1998 (42 USCS §9901 et. seq.), and the act of July 2, 2014 (P.L. 834, No. 90) known as the Community Services Block Grant Act, as a state-administered anti-poverty block grant that funds the operations of a network of certified CSBG eligible entities (CEE) including Community Action Agencies (CAA) and local government entities. The goal of these local agencies is to ameliorate the causes and conditions of poverty. The national CSBG network consists of more than 1,000 agencies that create, coordinate, and deliver programs and services to low-income Americans in 99 percent of the nation's counties.

Like other block grants, CSBG funds are allocated to the states and local agencies through a formula. Because CSBG often funds the central management and core activities of agencies, the CSBG network is able to mobilize additional resources to combat the central causes and conditions of poverty. These entities are required to coordinate or provide services and activities addressing the specific needs of their service area as identified through a community needs assessment process. Activities most often include early childhood education and services, income management, emergency and utility assistance services, health and nutrition programs, transportation and housing assistance, employment training and placement, and linkages to other anti-poverty programs.

Community representation and accountability are hallmarks of the CSBG network, and CEEs are governed by a tripartite board, federally mandated CSBG Organizational Standards, and Results Oriented Management and Accountability (ROMA) principles.

States are required to submit a yearly plan to the federal government detailing priorities and plans for the use of CSBG funds across the state. The Pennsylvania state plan includes information on how the state will provide oversight, training, and technical assistance to the CEEs as well as state wide goals and performance measures.

The current Pennsylvania CSBG State Plan is located at: dced.pa.gov/csbg

Section II – Use of Funds

CEEs choose investments targeted to the specific needs of its local community and use the CSBG funds in conjunction with other federal, state, local, and private funding streams. While there is no prescribed CSBG program, there is a common approach to fighting the causes of poverty and CSBG funding supports this unique work. The approach utilizes all available resources, human and financial, in the community to deliver high impact programs and projects that have transparent financial oversight. The approach can be summarized as proactive, sustainable, and leveraged, and is used to achieve three over-arching goals:

1. Individuals and families with low-income are stable and achieve economic security,
2. Communities where people with low-income live are healthy and which offer economic opportunity, and
3. Individuals with low-income are engaged and active in building opportunities in communities.

Section III – Eligibility for CSBG

A. Agencies

Eligible entities are any organization which was officially designated as a Community Action Agency (CAA), a Community Action Program, or a Limited Purpose Agency. These agencies must meet tripartite board structure requirements and serve low income populations. Currently, no new CAAs are being designated.

1. **State Lead Agency** – As the administrator of CSBG for the state of Pennsylvania, the Department of Community and Economic Development (DCED) is responsible for fiscal and programmatic oversight. The Department also offers technical assistance and contract monitoring.
2. **CSBG Eligible Entities** – Most agencies in the CSBG network are CAAs, created through the Economic Opportunity Act, a predecessor of the CSBG Act. These agencies are governed by a tripartite board which is comprised of a minimum of one-third democratically selected representatives of low-income individuals and families who reside in the geographic area being served by the agency. Another one-third must be local elected officials, holding office at their time of selection, or their representatives. The remaining board members must be chosen from local business, industry, labor, religious, law enforcement, education, or other major groups and interests in the community served.

DCED is required by federal CSBG legislation to seek qualified, private, nonprofit organizations as the first option for CEE designation. Only in circumstances where no such private nonprofit organization qualifies may the Department consider designating a political subdivision or public organization as a CEE.

Pennsylvania currently has two limited purpose agencies that serve the entire state with services designed to assist a specific population. This includes the Community Action Association of Pennsylvania (CAAP) that provides training, technical assistance, and mentoring to all member CEEs across the state.

B. Designation

Currently, Pennsylvania has 44 designated agencies (42 Community Action Agencies, and 2 Limited Purpose Agencies) that receive CSBG funding to provide services for all 64 counties. At this time, Pennsylvania is not seeking to designate new CEEs. Please refer to **Appendix A** for the current list of local CEEs and limited-purpose agencies.

C. Individuals

Individuals are not eligible to apply for CSBG funding or become a CEE. Individuals who are seeking services funded by CSBG should contact the CEE in their county.

Section IV – CSBG Programs and Services

CSBG agencies are expected to be catalysts in the community that work in collaboration with local resources and entities to remove barriers to self-sufficiency. Further, essential components of service delivery, whether direct or indirect services, include:

A. Service Area

A CEE must provide CSBG services equitably for the entirety of its coverage area.

B. Community Needs Assessment

CSBG agencies are expected to conduct Community Needs Assessments every three (3) years. Community Needs Assessments are the foundation with which CSBG funded programs base their work plan and programming.

C. Eligibility

Individuals and families served by CEEs with CSBG funding must fall at or below 125% of the Federal Poverty Income Guidelines (FPIG). Agencies may serve participants above this level with other funds as program regulations allow. However, to use CSBG funding the program records must maintain verification that individuals and families meet this threshold.

D. ROMA

CSBG agencies are expected to adhere to the Results Oriented Management and Accountability (ROMA) system for the entire agency. ROMA is a performance-based initiative designed to preserve the anti-poverty focus of community action and to promote greater effectiveness among state and local agencies receiving Community Services Block Grant (CSBG) funds.

ROMA is a recursive, evolutionary, and cyclical process of organizational management that seeks to examine and incorporate qualitative and quantitative data, along with other feedback, in the evaluation of outcomes and to guide and direct management processes. Full details about ROMA and its associated components and processes can be found at: www.nascsp.org/CSBG/594/ROMA.aspx?iHt=13

E. Outcome Reporting

CSBG agencies are required to report program outcome data quarterly in the web-based data collection site, Community Organization Planning and Outcome System (COPOS). The system collects program activity and outcome information from the CEEs to report to the federal government through the CSBG Annual Report administered by the Federal Department of Health and Human Services Office of Community Services (OCS). DCED and OCS use this information to evaluate the effectiveness of the CSBG program in Pennsylvania. This information is also utilized at the Congressional level to evaluate the effectiveness of CSBG nationwide.

F. Organizational Standards

Organizational Standards are a requirement of the U.S. Department of Health and Human Services (DHHS), Office of Community Services (OCS). Adherence to the Organizational Standards is required for all CEEs and compliance is monitored via the COPOS system, reviewed throughout the program year and reported to DHHS through the CSBG Annual Report. The Organizational Standards are located at: www.acf.hhs.gov/ocs/resource/csbg-im-138-state-establishment-of-organizational-standards-for-csbg-eligible-entities

G. Directives

Directives are issued from DCED's Center for Community Services and contain specific information regarding how CSBG programs are to be administered. These directives are contractually binding and are the basis for CSBG program monitoring. Because the CSBG program is administered within the same Center as the Weatherization program, some directives are combined to provide guidance to both programs. Additionally, directives related to the fiscal operations of CSBG are provided by DCED's Financial Management Center (FMC).

Directives are provided to CEEs directly, or can be located on the DCED's website at: dced.pa.gov/download/appendix-d-directives-listing-2017/

H. Monitoring

CSBG program monitoring of all CEEs occurs yearly by DCED's Center for Community Services in accordance with Pennsylvania's CSBG State Plan. These reviews are conducted to ensure programmatic and contractual compliance through a review of the agency's records, reports, and interactions with leadership and staff. The monitoring reviews can be conducted via an on-site visit or desk review from the Harrisburg office of DCED. Refer to the CSBG Directive C2016-06 for further information on monitoring procedures for the CSBG program.

I. Fiscal Operations and Oversight

CSBG agencies are expected to adhere to the Office of Management and Budget Super-Circular - 2 CFR Part 200 located at: www.gpo.gov/fdsys/pkg/FR-2013-12-26/pdf/2013-30465.pdf

Additionally, Organizational Standard #8 specifically addresses Fiscal Operations and Oversight. Directives CW 2016-01; CW 2016-03; FMC 2014-03(1); FMC 2014-01(2); FMC 2016-02; address fiscal procedures specifically. Directive FMC 2014-02(1) addresses the Federal Program Zero Dollar Contracts also known as the Master Agreement (**Appendix B**).

Periodic fiscal monitoring is also conducted by DCED's Financial Management Center.

J. Quarterly Budget and Funding Release

The Department issues a formula based allocation on a quarterly basis for which the CEEs provide a budget justification. Upon Departmental approval of the budget, a Funding Release will be issued and CSBG money is made available to invoice against.

K. Invoicing

CEEs must invoice the Department monthly for reimbursement of expenses resulting from the performance of CSBG services and programs. The monthly invoice format is included as **Appendix C**. Invoices must be submitted by the 20th day of each month to report expenditures for the previous month.

L. Financial Status Reports

Along with the monthly invoice, a Financial Status Report (FSR) must be submitted to the Department monthly. The FSR format is included as **Appendix D**. FSRs must be submitted by the 20th day of each calendar month for the previous month.

Section V – Limitations

The CSBG program does not prescribe a specific set of services to be provided with this funding. However, the following activities are not allowable by federal law:

A. Construction of Facilities

The CSBG funding may not be used for the purchase or improvement of land, or the purchase, construction or permanent improvement of a building or other facility.

B. Political Activities

CSBG funding may not be used to support:

- Any partisan or nonpartisan political activity, or any political activity associated with a candidate or contending faction or group in an election for public or party office;
- Any activity to provide voters or prospective voters with transportation to the polls or similar assistance in connection with any such election; or
- Any voter registration activity.

Section VI – Other Requirements

All CEEs are required to agree to the following assurances before CSBG programs or services begin.

A. Nondiscrimination

No funding shall be awarded to an agency under this program unless the agency certifies that the agency shall not discriminate against any employee or against any person seeking employment or assistance by reason of race, gender, creed, color, sexual orientation, gender identity or expression, or in violation of the Pennsylvania Human Relations Act, which prohibits discrimination on the basis of race, color, religious creed, ancestry, age, sex, national origin, handicap or disability, or in violation of any applicable federal laws. All contracts for work to be paid with grant funds must contain the commonwealth's official nondiscrimination clause.

B. Conflict of Interest Provisions

An officer, director, or employee of an agency who is a party to or has a private interest in a project or program shall disclose the nature and extent of the interest to the governing body of the agency, and may not vote on action of the agency concerning the program, nor participate in the deliberations of the agency concerning the program.

C. Record Retention

CEEs must maintain full and accurate records with respect to the program and must ensure adequate control over related parties in the program. The CSBG program office requires access to such records, as well as the ability to inspect all work, invoices, materials, and other relevant records at reasonable times and places. Upon request of the program office, the applicant must furnish all data, reports, contracts, documents, and other information relevant to the program.

Section VII – Application Process

Existing CEEs must submit applications that include program assurances every three years via the Department’s Electronic Single Application (ESA) system. At the beginning of every calendar year each CAA must submit a work plan for the year that outlines their plans for operating the CSBG program as it aligns with their strategic plan and community needs. Quarterly, CEEs are required to submit a budget justification to the program office for their allocation as communicated to them from DCED’s Center for Community Services. Through these budget justifications, quarterly funding is assigned to the agency’s contract.

At this time, Pennsylvania is not accepting applications from agencies outside the 44 that are currently receiving CSBG funding.

Section VIII – Program Inquiries

Each CEE is assigned a CSBG Program Specialist from the Department’s Center for Community Services. CEEs are encouraged to contact their respective Program Specialist with any questions or requests for clarification. Additionally, the Center’s resource account, RA-DCEDOCS@pa.gov can be used for general inquiries, although CEEs should first contact their designated CSBG Program Specialist.

Section IX – Appendices

Appendix A. CSBG Agency List

Appendix B. Master Agreement CSBG

Appendix C. Monthly Invoice CSBG

Appendix D. Financial Status Report (FSR)