

# Community Services Block Grant

Program Years 2024-2025

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## State Plan DRAFT





ADMINISTRATION FOR  
**CHILDREN & FAMILIES**  
 Office of Community Services

## Community Services Block Grant (CSBG) State Plan DRAFT

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THE PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13): Through this information collection, ACF is gathering information about planned activities related to and funded by CSBG for the upcoming fiscal year. Public reporting burden for this collection of information is estimated to average 31 hours per grantee, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. This is a mandatory collection of information (Sec. 676, Pub. L. 105-285, 112 Stat. 2735 (42 U.S.C. § 9908)). An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information subject to the requirements of the Paperwork Reduction Act of 1995, unless it displays a currently valid OMB control number. The OMB # is 0970-0382 and the expiration date is 08/31/2024. If you have any comments on this collection of information, please contact M. Monique Alcantara at [melania.alcantara@acf.hhs.gov](mailto:melania.alcantara@acf.hhs.gov).

## SECTION 1: CSBG Administrative Information

**1.1.** Identify whether this is a one-year or a two-year plan.

<b>1.1a.</b> Provide the federal fiscal years this plan covers:	<b>Year One</b>	2024
	<b>Year Two</b>	2025

**1.2. Lead Agency and Authorized Official:** Update the following information in relation to the lead agency and authorized official designated to administer CSBG in the state, as required by Section 676(a) of the CSBG Act. Information should reflect the responses provided in the Application for Federal Assistance, SF-424M.

**Has information regarding the state lead agency and authorized official changed since the last submission of the State Plan?** [No]

**1.2a. Lead agency:** [West Virginia Department of Economic Development]

**1.2b. Cabinet or administrative department of this lead agency**

☒ Other, describe: [Economic Development]

**1.2c. Cabinet or Administrative Department Name:** Provide the name of the cabinet or administrative department of the CSBG authorized official [West Virginia Department of Economic Development]

**1.2d. Authorized Official of the Lead Agency:** The authorized official could be the director, secretary, commissioner etc. as assigned in the designation letter (attached under item 1.3.). The authorized official is the person indicated as the authorized representative on the SF-424M and the official recipient of the Notice of Award per Office of Grant Management requirements.

**Name** Jennifer Ferrell

**Title** Director of Community Advancement and Development

**1.2e. Street Address** [1900 Kanawha Boulevard East, Building 3, Ste. 700]

**1.2f. City** [Charleston]

**1.2g. State** [West Virginia]

**1.2h. Zip Code** [25305]

**1.2i. Telephone Number** [304-558-2234]

**1.2j. Fax Number** [304-558-3248]

**1.2k. Email Address** [jennifer.l.ferrell@wv.gov]

**1.2l. Lead Agency Website** [https://wvcad.org]

**Note:** Item 1.2. pre-populates the Annual Report, Module 1, Item A.1.



**1.3. Designation Letter:** Attach the state's official CSBG designation letter. A new designation letter is required if the chief executive officer of the state and/or designated agency has changed. [\[Attach a document\]](#)

**1.4. CSBG Point of Contact:** Provide the following information in relation to the designated state CSBG point of contact. The state CSBG point of contact should be the person that will be the main point of contact for CSBG within the state.

**Has information regarding the state point of contact changed since the last submission of the State Plan?** [\[No\]](#)

**1.4a. Agency Name** [\[West Virginia Department of Economic Development\]](#)

**1.4b. Point of Contact Name**

**Name** [\[Shelly Woda\]](#)

**Title** [\[Sustainability Unit Manager\]](#)

**1.4c. Street Address** [\[1900 Kanawha Boulevard East, Building 3, Ste. 700\]](#)

**1.4d. City** [\[Charleston\]](#)

**1.4e. State** [\[West Virginia\]](#)

**1.4f. Zip Code** [\[25305\]](#)

**1.4g. Telephone Number** [\[304-352-4154\]](#)

**1.4h. Fax Number** [\[304-558-3248\]](#)

**1.4i. Email Address** [\[Shelly.J.Woda@wv.gov\]](mailto:Shelly.J.Woda@wv.gov)

**1.4j. Agency Website** [\[https://wvcad.org\]](https://wvcad.org)

**1.5. Provide the following information in relation to the State Community Action Association.**

**There is currently a state Community Action Association within the state.** [\[Yes\]](#)

**Has information regarding the state Community Action Association changed since the last submission of the State Plan?** [\[No\]](#)

**1.5a. Agency name** [\[West Virginia Community Action Partnerships, Inc\]](#)

**1.5b. Executive Director or Point of Contact**

**Name** [\[Mary Chipps\]](#)

**Title** [\[Executive Director\]](#)

**1.5c. Street Address** [\[One Creative Place\]](#)

**1.5d. City** [\[Charleston\]](#)

**1.5e. State** [\[West Virginia\]](#)

**1.5f. Zip Code** [\[25311\]](#)

**1.5g. Telephone Number** [\[304-347-2277\]](#)

**1.5h. Fax Number** [\[304-347-2001\]](#)

**1.5i. Email Address** [\[Mchipps@wvcap.org\]](mailto:Mchipps@wvcap.org)

**1.5j. State Association Website** [\[https://wvcap.org/\]](https://wvcap.org/)

**1.5k. State Association currently serves as the Regional Performance Innovation Consortia (RPIC) lead?** [\[No\]](#)



## SECTION 2: State Legislation and Regulation

- 2.1. **CSBG State Legislation:** State has a statute authorizing CSBG. [\[No\]](#)
- 2.2. **CSBG State Regulation:** State has regulations for CSBG. [\[No\]](#)
- 2.3. **Legislation/Regulation Document:** Attach the legislation and/or regulations or provide a hyperlink(s) to the documents indicated under Items 2.1. and/or Item 2.2. [\[N/A\]](#)
- 2.4. **State Authority:** Select a response for each of the following items about the state statute and/or regulations authorizing CSBG:
  - 2.4a. **Authorizing Legislation:** State legislature enacted authorizing legislation or amendments to an existing authorizing statute last federal fiscal year. [\[No\]](#)
  - 2.4b. **Regulation Amendments:** State established or amended regulations for CSBG last federal fiscal year. [\[No\]](#)

### SECTION 3: State Plan Development and Statewide Goals

**3.1. CSBG Lead Agency Mission and Responsibilities:** Briefly describe the mission and responsibilities of the state agency that serves as the CSBG lead agency. [West Virginia Community Advancement and Development works to encourage strong civic engagement through Infrastructure, Sustainability, Compliance, and Resiliency. WV CAD administers state and federal programs designed to improve the quality of life in West Virginia.]

**3.2. State Plan Goals:** Describe the state's CSBG-specific goals for state administration of CSBG under this State Plan.

1) To submit an application to the Secretary containing information and provisions that describe the programs for which assistance is sought under the community services block grant program prepared in accordance with and containing the information described in Section 676 of the Act. ['675A(b)].

2) To use not less than 90 percent of the funds made available to the State by the Secretary under Section 675A or 675B of the Act to make grants to eligible entities for the stated purposes of the community services block grant program and to make such funds available to eligible entities for obligation during the fiscal year and the succeeding fiscal year.

3) To limit the amount of funds carried over to the succeeding fiscal year of an allocation.

4) To spend no less than 5 percent of the grant received under Section 675A or the State allotment received under section 675C(b)(1) for discretionary expenses.

5) To hold at least one hearing in the State with sufficient time and statewide distribution of notice of such hearing, to provide to the public an opportunity to comment on the proposed use and distribution of funds to be provided through the grant or allotment under Section 675A or '675B for the period covered by the State plan. ['676(a)(2)(B)].

6) To review the Organizational Standards electronic Self-assessments bi-annually and provide Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs) for improvement.

7) To continue working with all WV CSBG Eligible Entities toward meeting at a minimum 80% of the Organizational Standards.

8) To present a summary of the CSBG State Plan at a triennial legislative hearing for block grants in the State of WV in accordance with ['676(a)(3)].

9) To provide timely communication to CEEs and statewide partners on the administration of CSBG, including, communication of grant requirements and training and technical assistance opportunities.

10) To annually assess CEE training needs in collaboration with the WV Community Action Partnership, and development a statewide training and technical assistance plan to provide targeted training opportunities focused on meeting the needs and achieving measurable outcomes.

**Note:** This information is associated with State Accountability Measure 1Sa(i) and pre-populates the state's Annual Report, Module 1, Item B.1.

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

**3.3a. Analysis of state-level tools** [Check all that applies and provide additional information where applicable]

- ☐ State Performance Indicators and/or National Performance Indicators (NPIs)
- ☐ U.S. Census data
- ☒ State Performance Management Data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)
- ☒ Monitoring Visits/Assessments
- ☐ Tools Not Identified Above (specify) [Narrative, 500 characters]

**3.3b. Analysis of local-level tools** [Check all that applies and provide additional information where applicable]

- ☒ Eligible Entity Community Needs Assessments
- ☒ Eligible Entity Community Action Plans
- ☐ Public Hearings/Workshops
- ☒ Tools Not Identified Above (e.g., state required reports) [specify] [Narrative, 500 characters]

West Virginia Training and Technical Assistance Plan

**3.3c. Consultation with** [Check all that applies and provide additional information where applicable]

- ☒ Eligible Entities (e.g., meetings, conferences, webinars; not including the public hearing)
- ☒ State Association
- ☒ National Association for State Community Services Programs (NASCSPP)
- ☒ Community Action Partnership (NCAP)
- ☐ Community Action Program Legal Services (CAPLAW)
- ☐ CSBG Tribal Training and Technical Assistance (T/TA) provider
- ☐ Regional Performance Innovation Consortium (RPIC)
- ☒ Association for Nationally Certified ROMA Trainers (ANCRT)
- ☐ Federal CSBG Office
- ☐ Organizations not identified above (specify) [Narrative, 500 characters]

**3.4. Eligible Entity Involvement**

**3.4a. State Plan Development:** Describe the specific steps the state took in developing the State Plan to involve the eligible entities. [



The State office conducted meetings with CEE Executive directors over the last 2 years. During these meetings, the CSBG Program Manager specifically asked for feedback and input on current CSBG policies and procedures including organizational standards implementation, monitoring procedures, procedures for awarding discretionary funding, ROMA system implementation, and the provision of training and technical assistance among other topics. The state association worked with the state office to ensure that eligible entities were being heard and that the state is responsive to the concerns and needs of the eligible entities. Prior to completion of the State Plan, the state office asked all CEE executive directors if anyone had specific requests or suggestions for changes to CSBG policy or the proposed plan for FY 2024-2025.]

**Note:** This information is associated with State Accountability Measures 1Sa(ii) and may pre-populate the state’s annual report form.

**3.4b. Performance Management Adjustment:** Describe how the state has adjusted its State Plan development procedures under this State Plan, as compared to previous State Plans, in order to 1) encourage eligible entity participation and 2) ensure the State Plan reflects input from eligible entities? Any adjustment should be based on the state’s analysis of past performance in these areas, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. [The State Office has established the practice of addressing 1-2 sections of the CSBG State Plan at a time with meetings in which the sections of the plan are addressed in detail. These meetings allow for ongoing and in-depth discussion on each CSBG topic addressed through the plan. Based on discussion Only minor adjustments are being made to this plan compared to the previous plans due to positive feedback about the direction of CSBG administration by the State Office, and a continuous effort to keep the CEEs informed along the way.]

**Note:** This information is associated with State Accountability Measures 1Sb(i) and (ii) and pre-populate the Annual Report, Module 1, Item B.1.

**3.5. Eligible Entity Overall Satisfaction:** Provide the state’s target for eligible entity Overall Satisfaction during the performance period. [80] **Year One** [85] **Year Two**

**Instructional Note:** The state’s target score will indicate improvement or maintenance of the states’ Overall Satisfaction score from the most recent American Customer Survey Index (ACSI) survey of the state’s eligible entities.

**Note:** Item 3.5 is associated with State Accountability Measure 8S and may pre-populate the state’s annual report form.

## SECTION 4: CSBG Hearing Requirements

**4.1. Public Inspection:** Describe the steps taken by the state to disseminate this State Plan to the public for review and comments prior to the public hearing, as required under Section 676(e)(2) of the Act.

1. The State Plan was posted on grantee office website for review.
2. An ad was ran for 3 days in the 7 largest newspapers across the state informing how to obtain a copy of the plan, make comments, and attend the public hearing.
3. The State Plan was discussed in person with CEE EDs/CEOs and the State Association.

**4.2. Public Notice/Hearing:** Describe how the state ensured there was sufficient time and statewide distribution of notice of the public hearing(s) to allow the public to comment on the State Plan, as required under 676(a)(2)(B) of the CSBG Act. [The plan was made available to CEEs incrementally throughout the year during statewide ED/CEO meetings with the CSBG State Office and State Association. The purpose is to discuss the plan 1 section at a time in order to pay close attention to the State's plan in each area of the plan with the ability to focus conversation on the different sections and obtain meaningful feedback. CEEs were notified by email that the plan was posted for review and comment. The State Plan has been available for comment since August 3, 2023 online at <https://wvcad.org/sustainability/community-service-block-grant>. Ads were placed in 7 newspapers across the state notifying the public of how to obtain and view a copy of the draft state plan, and also to provide information regarding the physical and virtual location of the public hearing that was scheduled to take place on 8/28/2023. Notice of the hearing was also filed with the WV Secretary of State's office for public review. The plan was also made available to CEEs incrementally throughout the year during statewide ED/CEO meetings with the CSBG State Office and State Association. The purpose is to discuss the plan 1 section at a time in order to pay close attention to the State's plan in each area of the plan with the ability to focus conversation on the different sections and obtain meaningful feedback. CEE's were notified of the availability of the plan via email.

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

**Instructional Note: A public hearing is required for each new submission of the State Plan.** The date(s) for the public hearing(s) must have occurred in the year prior to the first federal fiscal year covered by this plan. Legislative hearings are held at least every three years and must have occurred within the last three years prior to the first federal fiscal year covered by this plan.

Date [Select a Date]	Location [Provide the facility and city – Narrative 100 characters]	Type of Hearing [Select an option]	If a Combined Hearing was held confirmed that the public was invited.
8/28/2023	1900 Kanawha Blvd. East, Building 3, Ste. 700	Public	<input type="checkbox"/>
1/12/2022	1900 Kanawha Blvd. East, Building 1, House Chamber	Legislative	

**4.4.** Attach supporting documentation or a hyperlink for the public and legislative hearings.  
[See Attached]

## SECTION 5: CSBG Eligible Entities

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

<b>CSBG Eligible Entity</b>	<b>Geographical Area Served (by county) [Provide all counties]</b>	<b>Public or Nonprofit</b>	<b>Type of Entity [Choose all that apply]</b>
EnAct, Inc.	Boone County, Clay County, Fayette County, Kanawha County, Putnam County	Nonprofit	Community Action Agency
North Central West Virginia Community Action Association, Inc.	Barbour County, Greenbrier County, Marion County, Monongalia County, Pocahontas County, Preston County, Randolph County, Taylor County, Tucker County	Nonprofit	Community Action Agency
Southwestern Community Action Council, Inc.	Cabell County, Lincoln County, Mason County, Wayne County	Nonprofit	Community Action Agency
Nicholas Community Action Partnership, Inc.	Nicholas County	Nonprofit	Community Action Agency
Eastern West Virginia Community Action Agency, Inc.	Grant County, Hampshire County, Hardy County, Mineral County, Morgan County, Pendleton County	Nonprofit	Community Action Agency
PRIDE Community Services, Inc.	Logan County	Nonprofit	Community Action Agency
Community Resources, Inc.	Calhoun County, Doddridge County, Gilmer County, Jackson County, Pleasants County, Ritchie County, Roane County, Tyler County, Wetzel County, Wirt County, Wood County	Nonprofit	Community Action Agency
Coalfield Community Action Partnership, Inc.	Mingo County	Nonprofit	Community Action Agency
Community Action of South Eastern West Virginia, Inc.	Mercer County, Monroe County, Summers County	Nonprofit	Community Action Agency
Mountainheart Community Services, Inc.	Wyoming County	Nonprofit	Community Action Agency
Mountain CAP of West Virginia Inc	Braxton County, Upshur County, Webster County	Nonprofit	Community Action Agency
Change, Incorporated	Brooke County, Hancock County, Marshall County, Ohio County	Nonprofit	Community Action Agency



CSBG Eligible Entity	Geographical Area Served (by county) [Provide all counties]	Public or Nonprofit	Type of Entity [Choose all that apply]
Central West Virginia Community Action Association, Inc.	Harrison County, Lewis County	Nonprofit	Community Action Agency
Raleigh County Community Action Association	Raleigh County	Nonprofit	Community Action Agency
Telamon Corporation	Berkeley County, Jefferson County	Nonprofit	Community Action Agency
Council of the Southern Mountains, Inc.	McDowell County	Nonprofit	Community Action Agency

**Note:** Table 5.1. pre-populates the Annual Report, Module 1, Table C.1.

**5.2.** Total number of CSBG eligible entities: [16](#)

**5.3. Changes to Eligible Entities List:** Within the tables below, describe any changes that have occurred to the eligible entities within the state since the last federal fiscal Year (FFY), as applicable.

One or more of the following changes were made to the eligible entity list:

☒ No Changes to Eligible Entities List

**5.3a. Designation and Re-Designation:** Identify any new entities that have been designated as eligible entities, as defined under Section 676A of the Act, since the last federal fiscal year. Include any eligible entities designated to serve an area previously not served by CSBG as well as any entities designated to replace another eligible entity that was terminated (de-designated) or that voluntarily relinquished its status as a CSBG eligible entity. [\[None\]](#)

**5.3b. De-Designations and Voluntary Relinquishments:** Identify any entities that are no longer receiving CSBG funding. Include any eligible entities have been terminated (de-designated) as defined under Section 676(c) and Section 676C of the Act, or voluntarily relinquished their CSBG eligible entity status since the last federal fiscal year. [\[None\]](#)

**5.3c. Mergers:** In the table below, provide information about any mergers or other combinations of two or more eligible entities that were individually listed in the prior State Plan. [\[None\]](#)

## SECTION 6: Organizational Standards for Eligible Entities

**Note:** Reference IM 138, *State Establishment of Organizational Standards for CSBG Eligible Entities*, for more information on Organizational Standards. Click [HERE](#) for IM 138.

**6.1. Choice of Standards:** Confirm whether the state will implement the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138) or an alternative set during the federal fiscal year(s) of this planning period. [\[Select one\]](#)

- ☒ COE CSBG Organizational Standards
- ☐ Modified Version of COE CSBG Organizational Standards
- ☐ Alternative Set of organizational standards

**Note:** Item 6.1. pre-populates the Annual Report, Module 1, Item D.1.

**6.1a. Modified Organizational Standards:** In the case that the state is requesting to use modified COE-developed organizational standards, provide the proposed modification for the FFY of this planning period including the rationale. [\[N/A\]](#)

**6.1b. Alternative Organizational Standards:** If using an alternative set of organizational standards, attach the complete list of alternative organizational standards. [\[N/A\]](#)

**6.1c. Alternative Organizational Standards:** If using an alternative set of organizational standards: 1) provide any changes from the last set provided during the previous State Plan submission; 2) describe the reasons for using alternative standards; and 3) describe how they are at least as rigorous as the COE- developed standards.

- ☒ There were no changes from the previous State Plan submission

**6.2. Implementation:** Check the box that best describes how the state officially adopted organizational standards for eligible entities in a manner consistent with the state's administrative procedures act. If "Other" is selected, provide a timeline and additional information, as necessary.

- ☒ Policy
- ☒ Contracts with Eligible Entities

**6.3. Organizational Standards Assessment:** Describe how the state will assess eligible entities against organizational standards this federal fiscal year(s). [\[Check all that applies\]](#)

- ☒ Regular On-Site CSBG monitoring

**6.3a. Assessment Process:** Describe the planned assessment process. [\[The State's Organizational Standards review process includes review of the Organizational Standards as part of biannual comprehensive CSBG monitoring. The State will report to OCS on the standards annually in the CSBG Annual Report. Eligible entities will maintain electronic documentation of compliance with the standards. The State will conduct a comprehensive desk review of the organizational standards and provide feedback through a Technical Assistance Plan or Quality Improvement Plan in conjunction with](#)

regular, comprehensive CSBG monitoring reports. The State will work with the WV Community Action Partnership, Inc. to develop timely and effective training to address common training needs among all eligible entities. The State is responsible for ensuring that all eligible entities meet all organizational standards. Some standards may take several years for eligible entities to meet, but every entity must make steady progress toward the goal of meeting all standards.]

**6.4. Eligible Entity Exemptions:** Will the state make exceptions in applying the organizational standards for certain eligible entities due to special circumstances or organizational characteristics (as described in IM 138)? [No]

**6.4a.** Provide the specific eligible entities the state will exempt from meeting organizational standards and provide a description and a justification for each exemption. Total Number of Exempt Entities: [0]

**6.5. Performance Target:** Provide the percentage of eligible entities that the state expects to meet all the state-adopted organizational standards for the FFY(s) of this planning period.    **Year One** 12.5 %                      **Year Two** 25 %

**Note:** Item 6.5. is associated with State Accountability Measures 6Sa and pre-populates the Annual Report, Module 1, Table D.2.



## SECTION 7: State Use of Funds

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

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

☒ Base + Formula

**7.1a. Formula Description:** Describe the current practice for allocating CSBG funds to eligible entities. [BASE ALLOCATION: \$150,000 is allocated to each CEE + \$5,000 for each county within the designated service area. + FORMULA ALLOCATION: The amount remaining is divided by the total # of individuals in the state under 125% of the FPL producing a dollar amount to be allocated to each CEE for each individual under 125% of the FPL in the designated service area. The state updates the formula as poverty statistics become available. This may or may not cause significant changes to allocations depending on the number of individuals under 125% of the FPL in the designated service area.]

**7.1b. Statute:** Does a state statutory or regulatory authority specify the formula for allocating “not less than 90 percent” funds among eligible entities? [No]

**7.2. Planned Allocation:** Specify the percentage of your CSBG planned allocation that will be funded to eligible entities and in accordance with the “not less than 90 percent funds” requirement as described under Section 675C(a) of the CSBG Act. In the table, provide the planned allocation for each eligible entity receiving funds for the fiscal year(s) covered by this plan.

Year One 90%

Year Two 90%

#### Planned CSBG 90 Percent Funds – Year One

CSBG Eligible Entity	Funding Amount (\$)
EnAct, Inc.	\$1,028,285.00
North Central West Virginia Community Action Association, Inc.	\$1,043,785.00
Southwestern Community Action Council, Inc.	\$742,120.00
Nicholas Community Action Partnership, Inc.	\$231,636.00
Eastern West Virginia Community Action Agency, Inc.	\$393,862.00
PRIDE Community Services, Inc.	\$286,989.00
Community Resources, Inc.	\$749,456.00
Coalfield Community Action Partnership, Inc.	\$259,261.00
Community Action of South Eastern West Virginia, Inc.	\$430,643.00
MountainHeart Community Services, Inc.	\$226,639.00
Mountain CAP of West Virginia Inc	\$320,852.00
Change, Incorporated	\$462,760.00
Central West Virginia Community Action Association, Inc.	\$375,222.00
Raleigh County Community Action Association	\$395,839.00
Telamon Corporation	\$461,723.00
Council of the Southern Mountains, Inc.	\$240,459.00
<b>Total (Auto-calculated)</b>	<b>\$ 7,649,531.00</b>

### Planned CSBG 90 Percent Funds – Year Two

CSBG Eligible Entity	Funding Amount (\$)
EnAct, Inc.	\$1,028,285.00
North Central West Virginia Community Action Association, Inc.	\$1,043,785.00
Southwestern Community Action Council, Inc.	\$742,120.00
Nicholas Community Action Partnership, Inc.	\$231,636.00
Eastern West Virginia Community Action Agency, Inc.	\$393,862.00
PRIDE Community Services, Inc.	\$286,989.00
Community Resources, Inc.	\$749,456.00
Coalfield Community Action Partnership, Inc.	\$259,261.00
Community Action of South Eastern West Virginia, Inc.	\$430,643.00
MountainHeart Community Services, Inc.	\$226,639.00
Mountain CAP of West Virginia Inc	\$320,852.00
Change, Incorporated	\$462,760.00
Central West Virginia Community Action Association, Inc.	\$375,222.00
Raleigh County Community Action Association	\$395,839.00
Telamon Corporation	\$461,723.00
Council of the Southern Mountains, Inc.	\$240,459.00
<b>Total (Auto-calculated)</b>	<b>\$ 7,649,531.00</b>

**Note:** This information pre-populates the state’s Annual Report, Module 1, Table E.2.

**7.3. Distribution Process:** Describe the specific steps in the state’s process for distributing 90 percent funds to the eligible entities and include the number of days each step is expected to take. Please include information about state legislative approval or other types of administrative approval (such as approval by a board or commission). [Ninety percent (90%) of the CSBG funds allotted to the State will be allocated to CSBG eligible entities based on the established formula. CEEs will have 30 days to complete and submit their application. The State will then review applications for completeness within 30 days. Once an application is approved, the State will issue a Grant Agreement and award notification to the CEE based on the level of funding received from ACF at that time. Grant Agreements are distributed and executed prior to the start of the program year. Typically, the first award notice will represent the first quarter of funding made available to the State by the U.S. Administration for Children and Families. The State will not permit an entity to spend multiple allotments simultaneously. The distribution formula will be updated as new poverty data becomes available.]

**7.3a. Distribution Method:** Select the option below that best describes the distribution method the state uses to issue CSBG funds to eligible entities:

- ☐ Reimbursement
- ☐ Advance
- ☒ Hybrid
- ☐ Other

**7.4. Distribution Timeframe:** Does the state intend to make funds available to eligible entities no later than 30 calendar days after OCS distributes the federal award?  
[No]

**7.4a. Distribution Consistency:** If no, describe state procedures to ensure funds are made available to eligible entities consistently and without interruption. [This actually depends on when funds are made available to the State in relation to the start of the CSBG program year in WV, which is January 1. Once the State receives its Federal award letter, the CSBG Administrator provides a copy to the State fiscal office to set up the Federal award in the state accounting system OASIS, and notifies Eligible Entities of the award amount. West Virginia operates its CSBG program on a calendar year of January 1 through December 31, which means funding is delayed by 3 months. Since CSBG grants are two-year grants, this practice does not impede eligible entities from being able to draw down CSBG funds since they will be spending their 4th quarter allocation from October-December. Due to the uncertainty of when Federal awards will be received, this method allows the eligible entities to better plan program expenditures and allows for consistent grant start dates from year to year. This process ensures that funds are provided upon request and without interruption. CSBG Eligible Entities apply for funding through an application process during October based on estimated award amounts. Applications are reviewed by the State office during November, and Grant Agreements and 1st quarter award notices are sent out in December for a January 1 start date. To ensure all funds are expended by the program completion date, the State works closely with agencies that are still spending carry-over funds after the 12th month of program operations. If needed, the State will approve a formal request from an eligible entity to extend the period of the grant beyond 12 months. Extensions will be granted in 3 month increments until all funds are spent. Agencies are not permitted to spend a new award until all previous year funds are completely spent. If an extension is needed, an agency must request a no-cost, time extension in the 11th month of the current program year in order to carry-over funds.]

**Note:** Item 7.4 is associated with State Accountability Measure 2Sa and may pre-populate the state's annual report form.

**7.5. Distribution of Funds Performance Management Adjustment:** Describe the state's strategy for improving grant and/or contract administration procedures under this State Plan as compared to past plans. Any improvements should be based on analysis of past performance and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any improvements, provide further detail. [ACSI scores and communication with eligible entities indicate high satisfaction with the state's grant administration procedures. The state intends to continue procedures that are in place which consist of requiring eligible entity submission of applications and community action plans in October of each year. Applications are submitted electronically through the State of West Virginia wvOASIS Vendor Self-serve portal. Applications are reviewed by program managers, evaluated, and routed to Agency Level 2 for consideration before routing to the Governor's office for review and approval. Once approved, grants are generated electronically, and grant agreements are completed and routed for signature by the state office and eligible entities. This process is completed prior to the start of the CSBG programmatic year which operated from January 1<sup>st</sup> through December 31<sup>st</sup>.]

**Note:** This information is associated with State Accountability Measure 2Sb and may pre-populate the state's annual report form.

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

- 7.6. Allocated Funds:** Specify the percentage of your CSBG planned allocation for administrative activities for the FFY(s) covered by this State Plan.

**Year One** 5.00 %                      **Year Two** 5.00 %

**Note:** This information pre-populates the state's Annual Report, Module 1, Table E.4.

- 7.7. State Staff:** Provide the number of state staff positions to be funded in whole or in part with CSBG funds for the FFY(s) covered by this State Plan.

**Year One** 15.00                      **Year Two** 15.00

- 7.8. State FTEs:** Provide the number of state Full Time Equivalents (FTEs) to be funded with CSBG funds for the FFY(s) covered by this State Plan?

**Year One** 4.00 **Year Two** 4.00                      **[Numeric response, 0.00 – 99.99]**

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

- 7.9. Remainder/Discretionary Funds Use:** Does the state have remainder/discretionary funds as described in Section 675C(b) of the CSBG Act? [\[Yes\]](#)

If yes, provide the allocated percentage and describe the use of the remainder/discretionary funds in the table below. **Year One** 5.00 %    **Year Two** 5.00 %

**Note:** This response will link to the corresponding assurance, Item 14.2.

**Note:** This information is associated with State Accountability Measures 3Sa and pre-populates the Annual Report, Module 1, Table E.7.

### Use of Remainder/Discretionary Funds – Year One

Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
7.9a. Training/Technical Assistance to eligible entities	\$192,000.00	These planned services/activities will be described in State Plan Item 8.1 <a href="#">[Read-Only]</a>
7.9b. Coordination of state-operated programs and/or local programs		
7.9c. Statewide coordination and communication among eligible entities	\$200,000.00	These planned services/activities will be described in State Plan Section 9, State Linkages and Communication
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need (Briefly describe under Column 4)		
7.9e. Asset-building programs (Briefly describe under Column 4)		
7.9f. Innovation programs/activities by eligible entities or other neighborhood groups (Briefly describe under Column 4)		
7.9g. State Charity tax credits (Briefly describe under Column 4)		
7.9h. Other activities (Specify these other activities under Column 4)	\$32,974.00	Emergency Assistance funds available for distribution as needed
<b>Totals (Auto-Calculated)</b>	<b>\$424,974.00</b>	

### Use of Remainder/Discretionary Funds – Year Two

Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
7.9a. Training/Technical Assistance to eligible entities	\$192,000.00	These planned services/activities will be described in State Plan Item 8.1
7.9b. Coordination of state-operated programs and/or local programs		
7.9c. Statewide coordination and communication among eligible entities	\$200,000.00	These planned services/activities will be described in State Plan Section 9, State Linkages and Communication
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need (Briefly describe under Column 4)		
7.9e. Asset-building programs (Briefly describe under Column 4)		
7.9f. Innovation programs/activities by eligible entities or other neighborhood groups (Briefly describe under Column 4)		
7.9g. State Charity tax credits (Briefly describe under Column 4)	\$0.00	
7.9h. Other activities (Specify these other activities under Column 4)	\$32,974.00	Emergency Assistance funds available for distribution as needed
<b>Totals (Auto-Calculated)</b>	<b>\$ 424,974.00</b>	



**7.10. Remainder/Discretionary Funds Partnerships:** Select the types of organizations, if any, the state intends to work with (by grant or contract using remainder/discretionary funds) to carry out some or all the activities in Table 7.9.

- ☐ The State Directly Carries Out All Activities (No Partnerships)
- ☐ The State Partially Carries Out Some Activities
- ☒ CSBG Eligible Entities (if checked, include the expected number of CSBG eligible entities to receive funds) [16]
- ☒ State Community Action Association
- ☐ Regional CSBG Technical Assistance Provider(s)
- ☐ National Technical Assistance Provider(s)
- ☐ Individual Consultant(s)
- ☐ Tribes and Tribal Organizations
- ☐ Other [Narrative, 2500 characters]

**7.11. Use of Remainder/Discretionary Funds Performance Management Adjustment:**

Describe any adjustments the state will make to the use of remainder/discretionary funds under this State Plan as compared to past State Plans? Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. [The State is making minimal adjustments to the use of remainder/discretionary funds under this State Plan as compared to the most recent plan. Adjustments include reducing the amount of individual TTA grants to CEEs and shifting those funds to the State Association who is facilitating most of the statewide training and technical assistance. The State has also added about 33k into the Other activities category based on recommendations by the CEEs to have funds available to provide in emergency situations that may arise that would be unexpected.]

**Note:** This information is associated with State Accountability Measures 3Sb and may pre-populate the state's annual report form.

## SECTION 8: State Training and Technical Assistance

- 8.1. Training and Technical Assistance Plan:** Describe the state’s plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan by completing the table below. The T/TA plan should include all planned CSBG-funded T/TA activities funded through the administrative or remainder/discretionary funds of the CSBG award (as reported in Section 7). The CSBG T/TA plan should include training and technical assistance conducted directly by the state or through partnerships (as specified in 8.3). Add a row for each activity: indicate the timeframe; whether it is training, technical assistance, or both; and the topic.

**Note:** This information is associated with State Accountability Measure 3Sc and pre-populates the Annual Report, Module 1, Table F.1.

**Training and Technical Assistance – Year One**

Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
Ongoing/Multiple Quarters	Both	Other	16 Individual T/TA Grants to CEEs for support of individual needs.

**NOTE: ADD-A-ROW FUNCTION** – States can add rows for each additional training. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. Brief Description of “Other” allows for 500 characters.

**Training and Technical Assistance – Year Two**

Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
Ongoing/Multiple Quarters	Both	Other	16 Individual T/TA Grants to CEEs for support of individual needs.

**NOTE: ADD-A-ROW FUNCTION** – States can add rows for each additional training. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. Brief Description of “Other” allows for 500 characters.

- 8.1 a. Training and Technical Assistance Budget:** The planned budget for all training and technical assistance:

**Year One** \$192,000      **Year Two** \$192,000

- 8.1 b. Training and Technical Assistance Collaboration:** Describe how the state will collaborate with the State Association and other stakeholders in the planning and delivery of training and technical assistance. [The state works collaboratively with the WV Community Action Partnership to prepare and distribute an annual training and technical assistance needs survey to each CEE. Once the survey results are received, the state office and Association then work together to determine high-priority needs, and prepare a training and technical assistance plan for the upcoming program year. We have plans to adjust the timing of the needs survey and planning process to have a completed T&TA plan prior to the submission of the CSBG State Plan in order to better complete this section of the plan. The state and Association work closely together to plan and deliver training to CEEs throughout the year. The Association received CSBG discretionary funds to assist with the provision of state-wide training.]

- 8.2. Organizational Standards Technical Assistance:** Does the state have Technical Assistance Plans (TAPs) in place for all eligible entities with unmet organizational standards, if appropriate? [Yes]

**Note:** 8.2 is associated with State Accountability Measure 6Sb. The state should put a TAP in place to support eligible entities with one or more unmet organizational standards.

**8.2a. Address Unmet Organizational Standards:** Describe the state's plan to provide T/TA to eligible entities to ensure they address unmet Organizational Standards. [The state developed a CSBG Organizational Standards Quick Reference Guide to assist CEEs in knowing how to document compliance with the standards. The State is making changes with this State Plan on monitoring procedures in which a comprehensive review of Organizational Standards by the State Office will occur as part of the bi-annual CSBG Comprehensive Monitoring. Any unmet standards noted in a monitoring report will be addressed through a TAP or QIP. The State will work with the State Association to review a list of unmet standards at least annually to determine if there is a trend in unmet standards that would prompt a need for statewide training or technical assistance to address concerns.]

- 8.3. Training and Technical Assistance Organizations:** Indicate the types of organizations through which the state intends to provide training and/or technical assistance as described in Item 8.1, and briefly describe their involvement.

- ☐ All T/TA is conducted by the state
- ☒ CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds) [16]
- ☐ Other community-based organizations
- ☐ State Community Action Association
- ☐ Regional CSBG technical assistance provider(s)
- ☐ National technical assistance provider(s)
- ☐ Individual consultant(s)
- ☐ Tribes and Tribal Organizations
- ☐ Other [Narrative, 1000 characters]

- 8.4. CSBG-Funded T/TA Performance Management Adjustment:** Describe adjustments the state made to the training and technical assistance plan under this State Plan as compared to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. [The State office is making minimal adjustments to this plan compared to the last state plan. The State office is working with the State Association, and R3PIC to coordinate technical assistance with the implementation of our joint TTA Plan. Moving forward, information from the most recent available ACSI will be considered when setting priorities for the administration of CSBG in cooperation with the CEEs and the State Association. A training and technical assistance survey was completed by the State Association in the summer of 2023 to assist in the development of the joint WV TTA Plan for PY2023. The State Association assesses training needs and works with the State Office to develop and coordinate training and technical assistance. In 2022, the State Association procured a Learning Management System

that will be utilized to enroll and track the progress of online and in-person training opportunities across the CEE network in WV. A primary focus of the LMS is to provide regular, consistent board training opportunities to all CEE boards in WV. The LMS will be further developed and implemented throughout 2024 and 2025.]

**Note:** This information is associated with State Accountability Measures 3Sd and may pre-populate the state's annual report form.

## SECTION 9: State Linkages and Communication

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

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

**Note:** This response will link to the corresponding CSBG assurance, Item 14.5. In addition, this information is associated with State Accountability Measure 7Sa and pre-populates the Annual Report, Module 1, Item G.1.

- ☒ State Low Income Home Energy Assistance Program (LIHEAP) office
- ☒ State Weatherization office
- ☐ State Temporary Assistance for Needy Families (TANF) office
- ☐ Head Start State Collaboration offices
- ☐ State public health office
- ☒ State education department
- ☒ State Workforce Innovation and Opportunity Act (WIOA) agency
- ☐ State budget office
- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ State child welfare office
- ☐ State housing office
- ☒ Other [State Energy Office State Historic Preservation Office WV Housing Development Fund WV Community Action Partnership, Inc. WV Coalition to End Homelessness, Inc.]

- 9.2. State Linkages and Coordination at the Local Level:** Describe how the state is encouraging partnerships and collaborations at the state level with public and private sector organizations, to assure the effective delivery and coordination of CSBG services to transform low-income communities and avoid duplication of services (as required by assurances under Section 676(b)(5) – (6)). [The State plans to create and maintain partnerships with governmental and other social services, especially antipoverty programs, to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by assurances under Sections 676(b)(5) and (b)(6)). The State maintains an active partnership with the West Virginia Community Action Partnership, the West Virginia Coalition to End Homelessness. The state office is a member of the Workforce WV Inter-agency Collaborative Team, and has encouraged communication between local Workforce Investment Boards and CEEs to engage one another and execute formal MOUs for the provision of employment related training and support services across the state. The State also participates on an HMIS (Homeless Management Information System) steering committee made up of representatives from all four WV

Continuums of Care, and a representative from the State CSBG/ESG office to promote collaboration and data sharing. The state office partners and collaborates with the WV Office of Energy through their annual conference and periodic meetings. The state works closely with the WV Department of Health and Human Resources which administers LIHEAP for WV. The primary focus of that collaboration is centered around provision of Weatherization services and emergency repair and replacement of heating systems for vulnerable citizens in WV. These program services are provided by WV CEEs.]

**Note:** This response will link to the corresponding CSBG assurances, Items 14.5 and 14.6, and pre-populates the Annual Report, Module 1, Item G.2.

### **9.3. Eligible Entity Linkages and Coordination**

**9.3a. State Assurance of Eligible Entity Linkages and Coordination:** Describe how the state will assure that eligible entities will partner and collaborate with public and private sector organizations to assure the effective delivery and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by the assurance under Section 676(b)(5)). [The State will assure that the eligible entities will coordinate and establish linkages to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by the assurance under Section 676(b)(5)). CSBG eligible entities operate within a network of local service providers to reduce duplication of effort and to coordinate resources to address various client circumstances. CSBG eligible entities have developed extensive information and referral networks and/or one stop service centers to meet the many needs of customers seeking services. Eligible entities partner with other public and private resources to provide a complete range of services for individuals, families, and communities. WV CEEs are required to include (as part of the Community Action Plan) a list of community partners collaborating on each of the entity's programs. WV CEEs report significant leveraging of non-Community Service Block Grant Funds to meet identified community needs. The state CSBG network is working collaboratively across the network to expand the access to services to low-income individuals by making a Mobile phone application available in which individuals can apply directly for services without having to travel to an office. The state is working to bring as many services providers and funders on board in the state as possible. The State recognizes barriers within the variety of state assistance programs where different state agencies administer programs. While the CSBG State Office strives to streamline intake and data collections processes for low-income individuals, collaboration with other state programs proves to be difficult in regard to data collection and reporting. Many state agencies have existing data systems and due to state procurement rules, its nearly impossible to streamline those processes across state agencies. The CSBG State Office hopes to pursue state administrators with plans to coordinate efforts as much as possible and offer a solution to these barriers.]

**Note:** This response will link to the corresponding CSBG assurance, Item 14.5. and pre-populates the Annual Report, Module 1, Item G.3a.



**9.3b. State Assurance of Eligible Entity Linkages to Fill Service Gaps:** Describe how the eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations, according to the assurance under Section 676(b)(3)(B) of the CSBG Act. [The eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations, according to the assurance under Section 676(b)(3)(B) of the CSBG Act. Through linkages established within the service areas of programs operated by CEEs, individuals and families can be connected to an array of local programs and services to meet the needs of family members. A condition of continued receipt of CSBG funds each year is the submission of an annual CSBG Application which includes information on programs which assist low-income individuals and includes the entities follow-up mechanisms.

CSBG eligible entities are encouraged to provide appropriate case management services including an assessment of the households needs and a plan of action to meet the needs and regular follow-up to ensure that clients are making progress in meeting established goals. Each CSBG eligible entity includes a description of how the entity coordinates and mobilizes public and private resources to affect maximum leveraging for CSBG funds.

CSBG funds provide support that enables CSBG eligible entities to operate an array of anti-poverty and social service programs. Coordination of public and private funding takes place at the local level in a variety of ways suited to the individual community and available resources. CSBG eligible entity staff and/or administrators meet with other providers in the service area to determine how best to not duplicate services while providing the services needed to meet the emergency needs of low-income persons and establishing/improving programs which assist low-income persons to transition out of poverty.]

**Note:** This response will link to the corresponding CSBG assurance, Item 14.3b. and pre-populates the Annual Report, Module 1, Item G.3b.

- 9.4. Workforce Innovation and Opportunity Act (WIOA) Employment and Training Activities:** Does the state intend to include CSBG employment and training activities as part of a WIOA Combined State Plan, as allowed under the Workforce Innovation and Opportunity Act (as required by the assurance under Section 676(b)(5) of the CSBG Act)? [No]

**Note:** This response will link to the corresponding CSBG assurance, Item 14.5.

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

**9.4.b. Employment and Training Activities:** If the state selected no under Item

9.4, describe the coordination of employment and training activities, as defined in Section 3 of WIOA, by the state and by eligible entities providing activities through the WIOA system. [The State plans to partner with the WIOA office for the coordination of employment and training activities, as defined in Section 3 of WIOA, by the State and by eligible entities providing activities through the WIOA system. Under the WIA program WV law established an Interagency Collaborative Team comprised of the mandated partners under WIA. The State is continuing the group through WIOA. The State has reached out to this group to participate and present information about CSBG and how the programs can work together to improve employment outcomes and training activities in the State of WV. The Workforce ICT meets on the last Thursday of each month. The State office will continue to participate and educate the partners about the activities and purposes of CSBG. The State will continue to encourage CEEs to take a more active role in their local WIOA offices. The Workforce ICT meets on the last Thursday of each month with small groups meeting on additional dates when requested.]

- 9.5. Emergency Energy Crisis Intervention:** Describe how the State will assure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to Low Income Home Energy Assistance Program) are conducted in each community in the State, as required by the assurance under Section 676(b)(6) of the CSBG Act). [The State will assure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to Low-Income Home Energy Assistance) are conducted in each community in the State, as required by the assurance under Section 676(b)(6) of the CSBG Act). The State CSBG office is not the direct recipient of LIHEAP funding. The WV Department of Health and Human Resources (DHHR) Low-Income Home Energy Assistance Program (LIHEAP) allows West Virginia Weatherization Assistance Program Subrecipients the administration of an Energy Crisis Intervention Program (ECIP). The ECIP program is designed to aid households in need of emergency heat due to non-existent, non-operable, severely malfunctioning, unsafe, or severely inadequate heat during the winter months, from November 1 to March 15. The State office worked with the WVDHHR to develop an additional program funding by LIHEAP called the Emergency Repair and Replacement Program, which is designed to respond to no heat emergencies, as well as situations where cooling would be a necessity for elderly, small children, and individuals with health-related issues. The program is administered by CEEs in WV since the WV Department of Health and Human Resources does not have a provider network capable of administering these services. The program has been very successful since 2015 and is provided by 15 of 16 WV CEEs. The program is funded at around \$8 million for FFY2023.]

**Note:** This response will link to the corresponding CSBG assurance, Item 14.6.

- 9.6. Faith-based Organizations, Charitable Groups, and Community Organizations:** Describe how the state will assure local eligible entities will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations, according to the state's assurance under Section 676(b)(9) of the CSBG Act. [The State will assure local eligible entities will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations, according to the States assurance under Section 676(b)(9) of the CSBG Act. CEEs are required to submit an application that includes a Community Action Plan. The plan must include information on how the CEE coordinates programs with and forms partnerships with other organizations serving low-income residents of the communities, including religious organizations, charitable groups, and community organizations. The State reviews MOUs/partnership agreements during regular on-site monitoring and review of the CSBG

Organizational Standards. The State reviews the totals of partnership reported on the annual CSBG Report.]

**Note:** this response will link to the corresponding assurance, Item 14.9

**9.7. Coordination of Eligible Entity 90 Percent Funds with Public/Private Resources:**

Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act. [The eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act. CSBG eligible entities operate within a network of local service providers to reduce duplication of effort and to coordinate resources to address various client circumstances. CSBG eligible entities have developed extensive information and referral networks and/or one stop service centers to meet the many needs of the clients seeking services. Through linkages established within the service area individuals and families can be connected to an array of local programs and services to meet the needs of family members. Through the submission of annual Community Action Plans, each CEE identifies all additional funding sources planned to be utilized in the delivery of specific agency programs. The State office strives to encourage leveraging of additional funding sources to fill the gaps in services that are needed by low-income individuals and families in our State.]

**Note:** This response will link to the corresponding assurance, Item 14.3c.

**9.8. Coordination among Eligible Entities and State Community Action Association:**

Describe state activities for supporting coordination among the eligible entities and the State Community Action Association. [The State supports coordination among the eligible entities and the State Community Action Association by funding the Association with CSBG discretionary funding. The funding provides support for Community Action initiatives, training, software support, and administration. The association is the lead agency for ROMA training in the state. The State office provides program updates for all association board meetings. Coordination efforts include the support and management of the state's Learning Management System, ROMA NCRT/NCRI coordination, and requirements of the state's data management software for CEEs. The state typically supports the State Association conference each year.]

**Note:** This information will pre-populate the Annual Report, Module 1, Item G.5.

**9.9. Communication with Eligible Entities and the State Community Action Association:**

In the table below, detail how the state intends to communicate with eligible entities, the State Community Action Association, and other partners identified under this State Plan on the topics listed below. For any topic that is not applicable, select *Not Applicable* under Expected Frequency.

## Communication Plan

Subject Matter	Expected Frequency	Format	Brief Description of "Other"
Upcoming Public and/or Legislative Hearings	Biannual	Meetings/Presentations	
State Plan Development	Quarterly	Meetings/Presentations	
Organizational Standards Progress	Biannual	Other	Monitoring Report
State Accountability Measures Progress	Annually	Email	
Community Needs Assessments/Community Action Plans	Annually	Webinar	
State Monitoring Plans and Policies	As needed	Meetings/Presentations	
Training and Technical Assistance (T/TA) Plans	Semi-Annually	Email	
ROMA and Performance Management	Semi-Annually	Webinar	
State Interagency Coordination	As needed	Email	
CSBG Legislative/Programmatic Updates	As needed	Email	
Tripartite Board Requirements	As needed	Email	
General CSBG Meetings with Executive Directors	Quarterly	Meetings/Presentations	
Regular Meeting with Association Director	Monthly	Meetings/Presentations	

- 9.10. Feedback to Eligible Entities and State Community Action Association:** Describe how the state will provide information to local entities and State Community Action Associations regarding performance on State Accountability Measures. [The State will provide feedback to local entities and State Community Action Associations regarding performance on State Accountability Measures as part of quarterly CSBG eligible entity executive director meetings. The State will also share the CSBG Annual Report, which includes results of State Accountability Measures in Module 1.]

**Note:** This information is associated with State Accountability Measure 5S(iii) and will pre-populate the Annual Report, Module 1, Item G.6.

- 9.11. Communication Plan Performance Management Adjustment:** Describe any adjustments the state made to the Communication Plan in this State Plan as compared to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. [The State will continue to make strides toward improving communication, with plans to provide more regular email communication across the board. Communication has increased via bi-weekly phone calls, and while the State Office provided a verbal update on different topics, we sometimes did not follow up in email. We are evaluating our process of regular communication and working to improve going forward.]

**Note:** This information is associated with State Accountability Measures 7Sb; this response may pre-populate the state's annual report form.

## SECTION 10: Monitoring, Corrective Action, and Fiscal Controls

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

**10.1. Note:** This information is associated with State Accountability Measure 4Sa(i); this response pre-populates the Annual Report, Module 1, Table H.1.

#### Monitoring Schedule – Year One

CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review
EnAct, Inc.	Full on sight	On sight	FY1 Q4	7/11/2022	7/11/2022
North Central West Virginia Community Action Association, Inc.	Full on sight	On sight	FY1 Q1	10/19/2021	10/28/2021
Southwestern Community Action Council, Inc.	Full on sight	On sight	FY1 Q4	9/19/2022	9/20/2022
Nicholas Community Action Partnership, Inc.	Full on sight	On sight	FY1 Q2	11/15/2021	11/16/2021
Eastern West Virginia Community Action Agency, Inc.	Full on sight	On sight	FY1 Q4	8/29/2022	8/30/2022
Coalfield Community Action Partnership, Inc.	Full on sight	On sight	FY1 Q3	3/14/2022	3/15/2022
Community Action of South Eastern West Virginia, Inc.	Full on sight	On sight	FY1 Q3	5/31/2022	6/1/2022
Change, Incorporated	Full on sight	On sight	FY1 Q2	12/13/2021	12/14/2021

#### Monitoring Schedule – Year Two

CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review
PRIDE Community Services, Inc.	Full on sight	On sight	FY2 Q1	3/14/2023	3/16/2023
Community Resources, Inc.	Full on sight	On sight	FY2 Q2	4/10/2023	4/13/2023
MountainHeart Community Services, Inc.	Full on sight	On sight	FY2 Q1	10/17/2022	10/17/2022
Mountain CAP of West Virginia, Inc	Full on sight	On sight	FY2 Q3	6/5/2023	6/12/2023
Central West Virginia Community Action Association, Inc.	Full on sight	On sight	FY2 Q2	3/20/2023	3/22/2023
Raleigh County Community Action Association	Full on sight	On sight	FY2 Q4	8/7/2023	8/11/2023
Telamon Corporation	Full on sight	On sight	FY2 Q4	1/30/2023	2/2/2023
Council of the Southern Mountains, Inc.	Full on sight	On sight	FY2 Q3	6/12/2023	6/16/2023



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

See Attached: 10.2 CSBG Monitoring Policy

- 10.3. Initial Monitoring Reports:** According to the state's procedures, by how many calendar days must the state disseminate initial monitoring reports to local entities? [\[60\]](#)

**Note:** This item is associated with State Accountability Measure 4Sa(ii) and may pre-populate the state's annual report form.

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

- 10.4. Closing Findings:** Are state procedures for addressing eligible entity findings/deficiencies and the documenting closure of findings included in the state monitoring policies attached under 10.2? [\[Yes\]](#)

**10.4a. Closing Findings Procedures:** If no, describe state procedures for addressing eligible entity findings/deficiencies and the documenting closure of findings.  
[\[N/A\]](#)

- 10.5. Quality Improvement Plans (QIPs):** Provide the number of eligible entities currently on QIPs, if applicable. [\[0\]](#)

**Note:** The QIP information is associated with State Accountability Measures 4Sc.

- 10.6. Reporting of QIPs:** Describe the state's process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the state approving a QIP? [\[The State CSBG Program manager will notify the regional OCS representative of the QIP by email within 30 days of approving a QIP. The State will provide a copy of the QIP to the representative and provide additional information if requested.\]](#)

**Note:** This item is associated with State Accountability Measure 4Sa(iii)).

- 10.7. Assurance on Funding Reduction or Termination:** The state assures that "any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the state determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b)" per Section 676(b)(8) of the CSBG Act. [\[No\]](#)

**Note:** This response will link with the corresponding assurance under item 14.8.

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

**10.8. Eligible Entity Designation:** Does the state CSBG statute and/or regulations provide for the designation of new eligible entities? [\[No\]](#)

**10.8 a. New Designation Citation:** If yes, provide the citation(s) of the law and/or regulation. [\[N/A\]](#)

**10.8 b. New Designation Procedures:** If not, describe state procedures for the designation of new eligible entities and how the procedures were made available to eligible entities and the public. [\[The state will follow federal guidance and recommendations for the designation of new eligible entities\]](#)

**10.9. Eligible Entity Termination:** Does the state CSBG statute and/or regulations provide for termination of eligible entities? [\[No\]](#)

**10.9 a. Termination Citation:** If yes, provide the citation(s) of the law and/or regulation. [\[N/A\]](#)

**10.9 b. Termination Procedures:** If not, describe state procedures for termination of new eligible entities and how the procedures were made available to eligible entities and the public. [\[The state will follow federal guidance and recommendations for the termination of eligible entities\]](#)

**10.10. Eligible Entity Re-Designation:** Do the state CSBG statute and/or regulations provide for re-designation of an existing eligible entity? [\[No\]](#)

**10.10 a. Re-Designation Citation:** If yes, provide the citation(s) of the law and/or regulation. [\[N/A\]](#)

**10.10 b. Re-Designation Procedures:** If no, describe state procedures for re-designation of existing eligible entities and how the procedures were made available to eligible entities and the public. [\[The state will follow federal guidance and recommendations for the termination of new eligible entities.\]](#)

## **Fiscal Controls and Audits and Cooperation Assurance**

**10.11 Fiscal Controls and Accounting:** Describe how the state's fiscal controls and accounting procedures will a) permit preparation of the SF-425 Federal fiscal reports (FFR) and b) permit the tracing of expenditures adequate to ensure funds have been used appropriately under the block grant, as required by Block Grant regulations applicable to CSBG at 45 CFR 96.30(a). [\[The State has established appropriate fiscal controls and accounting procedures that permit the accurate and timely preparation of the SF-425. Multiple reports are run from the States accounting system \(wvOasis\). The information contained in these reports is used to prepare an initial SF-425. The SF-425 is then reconciled and reviewed before submission. Additionally, WVDO ensures staff possesses the required skills and knowledge necessary to prepare the SF-425. The CSBG Program Manager maintains an operational calendar with report deadlines and will work with fiscal staff to ensure the reports are submitted in a timely manner. To permit the tracing of expenditure adequate to ensure funds have been used appropriately under the block grant, as required by Block Grant regulations applicable to CSBG at 45 CFR 96361\(a\), the State conducts annual Fiscal Monitoring of](#)

eligible entities during which reported eligible entity expenditures are tested for allowability and internal controls and financial management systems are assessed.]

**10.12 Single Audit Management Decisions:** Describe state procedures for issuing management decisions for eligible entity single audits, as required by Block Grant regulations applicable to CSBG at 45 CFR 75.521. [Standard Review Procedures for Subrecipients Subject to Single Audit Act Subrecipient audits are due within the earlier of 30 calendar days after the issuance of the audit report or 9 months after the subrecipients fiscal year end. While there is no Federal regulatory deadline for the review of Single Audits if no management decision is required (see Management Decisions) this review process should generally be completed within 60 days of receipt of the audit, barring any unforeseen or unusual circumstances. The review process outlined below should be followed for all subrecipients that are subject to the Single Audit Act. I. Retrieving Single Audits from the Federal Audit Clearinghouse. The Federal Audit Clearinghouse (FAC) is the official repository for all audits conducted under the Single Audit Act.

The website for the FAC is currently here:

<https://harvester.census.gov/facdissem/Main.aspx> The Federal Audit Clearinghouse should be checked at least monthly for any new subrecipient audit submissions. The audit review log (attachment A) lists due dates of when audit reports should be uploaded to the FAC based on the subrecipients fiscal year. State staff will utilize the Subrecipient Audit Review Checklist when reviewing audits. The checklist is designed to test the completeness and correctness of the audit package, including the qualifications of the CPA firm, and required reporting to the Federal Audit Clearinghouse. Management decisions are required when: (a) A subrecipients audit discloses a federal award finding related to a program that the State Office administers. (b) A subrecipients audit discloses a federal award finding not related to a program that the State Office administers but the finding is related to a compliance requirement of one of the State Office's programs. To determine whether a federal award finding is related to a compliance requirement of one of the State Office's programs, please see Appendix XI to Part 200 Compliance Supplement, which lists compliance requirements by CFDA numbers. Management decisions may be issued at the State Office's discretion when:

(a) A subrecipients audit discloses a Federal award finding not related to a program that the State Office administers and the finding is not related to a compliance requirement of one of the State Office's programs (b) A subrecipients audit disclosed a financial statement finding If the State Office issues a management decision when it is not required, the management decision must clearly include a justification as to why a management decision is being issued. Generally, the State Office will issue a management decision when not required only if the audit finding has cross-cutting effects and has the potential to affect the State Office's programs. the State Office may request additional information and documentation from a subrecipient regarding audit findings before determining if a management decision will be issued and the type of management decision to be issued. If a management decision is to be issued, it must contain the following as applicable: (a) Reference numbers the subrecipients auditor assigned to each audit finding (b) Whether or not the audit finding is sustained (c) The reason(s) for the decision (d) Expected subrecipient follow-up i. Repayment of disallowed costs, if applicable ii. Making financial adjustments, if applicable iii. Other actions to be taken (e) Timetable for follow-up if corrective actions have not been completed (f) Description of the appeals process available to the subrecipient See attachment C for a template form letter to be used when issuing management

decisions. All management decisions will be signed by the State Office's director. Management decisions must be issued within 6 months of the acceptance of the subrecipients audit report by the FAC.]

**Note:** This information is associated with State Accountability Measure 4Sd.

- 10.11. Assurance on Federal Investigations:** The state will “permit and cooperate with Federal investigations undertaken in accordance with Section 678D” of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act. [Yes]

**Note:** This response will link with the corresponding assurance, Item 14.7

- 10.13a. Federal Investigations Policies:** Are state procedures for permitting and cooperating with federal investigations included in the state monitoring policies attached under 10.2? [No]

- 10.13b. Closing Findings Procedures:** If no, describe state procedures for permitting and cooperating with federal investigations.

[CSBG Grant Agreements with Eligible Entities to participate in the Community Services Block Grant include the assurance to "Permit and cooperate with federal investigations undertaken in accordance with section 678D of the Act; [676)b)(7)]. Additionally, the Grant Agreement includes the following section pertaining to this assurance:

**B. Cooperation**

The Subrecipient will cooperate and assist the Pass-through Entity or its authorized representative(s) with respect to the monitoring responsibilities and activities referenced herein, or with respect to any and all other monitoring activities deemed necessary and appropriate by the Pass-through Entity at its sole discretion to carry out its obligation to the Federal Government. Notwithstanding the administrative and reporting requirements presently cited within this Agreement, the Subrecipient will allow for the performance of on-site monitoring reviews by the Pass-through Entity, and will provide any technical assistance, reports, records, and all documentation necessary to comply with all requests for information as deemed necessary and appropriate by the Pass-through Entity, at its sole discretion, to fulfill its monitoring responsibilities and objectives. The Pass-through Entity or its authorized representative(s) will be given full and complete access to all information and personnel related to the performance of this Agreement to ensure that program activities and costs are consistent with goals and objectives of the grant.]

- 10.12. Monitoring Procedures Performance Management Adjustment:** Describe any adjustments the state made to monitoring procedures in this State Plan as compared to past plans? Any adjustment should be based on the state’s analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. [The CSBG Monitoring policies have been outlined in detail in a WV CSBG Information Memorandum Number 2021-2. There are no significant changes in the way monitoring has been performed during the last program period. This monitoring will be conducted in accordance with the guidance provided in Information Memorandum Transmittal No. 97, dated October 10, 2006. The State plans to make adjustments to the CSBG monitoring tools during FFY2022 to be implemented as training on the new tools can be provided.]

**Note:** This item is associated with State Accountability Measure 4Sb and may pre-populate the state’s annual report form.

## SECTION 11: Eligible Entity Tripartite Board

- 11.1. Tripartite Board Verification:** Verify which of the following measures are taken to ensure that the state verifies CSBG eligible entities are meeting Tripartite Board requirements under Section 676B(a)(2) of the CSBG Act. [\[Check all that applies and narrative where applicable\]](#)

- ☐ Attend Board meetings
- ☒ Organizational Standards Assessment
- ☒ Monitoring
- ☒ Review copies of Board meeting minutes
- ☒ Track Board vacancies/composition
- ☒ Other [\[The State verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B of the CSBG Act. The State will review copies of Board meeting minutes, track Board vacancies/composition, and review bylaws to ensure that the procedures for filling board positions meet the requirement and intent of the CSBG Act. Eligible entities are required to include Board documents, member info, and meeting documentation in the statewide data system that is reviewed in conjunction with regular on-site monitoring and in conjunction with training. The State Office has hired an Information Specialist who will assist in conducting regular desk-reviews of board compliance and notify CEEs by email of any vacancies, missing minutes, etc.\]](#)

- 11.2. Tripartite Board Updates:** Provide how often the state requires eligible entities (which are not on TAPs or QIPs) to provide updates regarding their Tripartite Boards. This includes but is not limited to copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc. [\[Select one and provide a narrative where applicable\]](#)

- ☐ Annually
- ☐ Semiannually
- ☐ Quarterly
- ☐ Monthly
- ☒ As It Occurs
- ☐ Other [\[Narrative, 2500 characters\]](#)

- 11.3. Tripartite Board Representation Assurance:** Describe how the states will verify that eligible entities have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entity's Tripartite Board as required by the assurance under Section 676(b)(10) of the CSBG Act. [\[The State will carry out the assurance under Section 676\(b\)\(10\) of the CSBG Act that the State will require eligible entities to have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entities Tripartite Board. The State will review the eligible entities policies and procedures during regular on-site monitoring. This assurance is included as part of the programmatic assurances the CEE agrees to in the grant agreement.\]](#)

**Note:** This response will link with the corresponding assurance, Item 14.10.

**11.4. Tripartite Board Alternative Representation:** Does the state permit public eligible entities to use, as an alternative to a Tripartite Board, “another mechanism specified by the state to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs” as allowed under Section 676B(b)(2) of the CSBG Act? [\[No\]](#)

**11.4a.** If yes, describe the mechanism used by public eligible entities as an alternative to a Tripartite Board. [\[N/A\]](#)



## SECTION 12: Individual and Community Income Eligibility Requirements

**12.1. Required Income Eligibility:** Provide the income eligibility threshold for services in the state. [\[Select one item below and numeric response where applicable.\]](#)

- ☒ 125% of the HHS poverty line
- ☐ X % of the HHS poverty line (fill in the threshold): [Click or tap here to enter text.%](#)  
[\[Numeric response\]](#)
- ☐ Varies by eligible entity [\[Narrative, 4000 characters\]](#)

**12.1a.** Describe any state policy and/or procedures for income eligibility, such as treatment of income and family/household composition. [\[To be eligible for CSBG services or benefits, clients must be at or below 125% of the federal poverty line as defined by the U.S. Department of Health and Human Services \(the HHS poverty guidelines\). Eligible entities must use the most current HHS poverty guidelines when assessing income eligibility. The current guidelines are published in the Federal Register and are available on the HHS website at \[www.hhs.gov\]\(http://www.hhs.gov\). The guidelines are calculated on a sliding scale based on the number of persons in a client's family. To calculate 125% of the federal poverty line, use the amount stated in the poverty guidelines relating to the number of persons in the client's household and multiply that number by 1.25. An eligible entity may, consistent with its most recent community needs assessment, give priority in providing CSBG services/benefits to clients of lower income levels within the CSBG income eligibility limit established by the state. Definition of Family/Household: For purposes of determining income eligibility, the term persons in family in the HHS poverty guidelines means persons in a household. A household includes any individual or group of individuals who are living together as one economic unit. The income of everyone in the household who is 18 years old or older must be included in determining income eligibility. In determining whether an individual is part of a household, the eligible entity may consider factors such as whether the individual pays for his/her own food and occupancy. Period to be Used for Determining Income: There is no prescribed look-back period for income assessment. Depending on an individual clients circumstances and the documentation available, it may be reasonable to calculate client income based upon the households gross income in the past 30 days \(multiplied by 12\) or based upon a review of the past year. \(For example, if a client has become unemployed or was the victim of domestic violence and has left the abusive household within the past year, it may be inaccurate to use the data of the past year to assess income, and the use of a shorter period of](#)

time perhaps several months may be a more appropriate and accurate assessment of the client's income. In addition, case-by-case circumstances such as seasonal employment or an isolated and temporary spike or decline in earnings may require an eligible entity to exercise reasonable discretion to determine on a case-by-case basis the most appropriate time period to review to most appropriately and accurately assess income). It is recommended that no time period shorter than the past 30 days or longer than the past year should be used, however. In exercising this reasonable discretion, the eligible entity's goal in each case should be to most accurately determine a clients actual financial position at the time of assessment. Income Verification: Before an applicant is determined to be eligible based on family income, the applicant must submit information to the program concerning the family's income. Verification must include examination of documents such as individual income tax forms, W- 2 forms, pay stubs, pay envelopes, or written statements from employers (if individual income tax forms, W-2 forms, pay stubs, or pay envelopes are not available). Applicants who claim no household income must sign a form attesting to that fact and to the accuracy of the information provided to the eligible entity. This form must also be signed by a staff member indicating that the staff member has, in good faith, attempted to verify this condition, and that the information on eligibility in the file is accurate to the best of the staff members knowledge. Income Documentation: An eligible entity must retain an eligibility determination record for each applicant for CSBG services/benefits... NOTE: Complete Income & Eligibility Policy and Procedures available upon request. (Full text will not fit here)]

- 12.2. Income Eligibility for General/Short Term Services:** Describe how the state ensures eligible entities generally verify income eligibility for those services with limited intake procedures (where individual income verification is not possible or practical). An example of these services is emergency food assistance. [The State does not address this in policy but plans to develop guidance in this area as part of a new CSBG Policy and Procedure Manual planned for release in FFY2024.]
- 12.3. Community-targeted Services:** Describe how the state ensures eligible entities' services target and benefit low-income communities for those services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations). [The State does not plan to address this in policy]

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

- 13.1. Performance Measurement System:** Identify the performance measurement system that the state and all eligible entities use, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act. [\[Select one\]](#)

**Note:** This response will also link to the corresponding assurance, Item 14.12. and will pre-populate the Annual Report, Module 1, Item I.1.

- ☒ The Results Oriented Management and Accountability (ROMA) System
- ☐ Another performance management system that meets the requirements of Section 678E(b) of the CSBG Act
- ☐ An alternative system for measuring performance and results

**13.1a. ROMA Description:** If ROMA was chosen in Item 13.1, describe the state's written policies, procedures, or guidance documents on ROMA. [\[The Performance Management Framework includes: 1\) Organizational standards for local CSBG eligible entities; 2\) Accountability measures for states and OCS; 3\) Results Oriented Management and Accountability \(ROMA\) Next Generation; and 4\) The CSBG Annual Report, which includes an updated and refined set of CSBG outcome measures. These elements are designed to increase accountability across all three levels of the network \(Federal, State and local\) and to enable program administrators at all levels to make better program decisions based on data. WV CEEs certify that all activities carried out with funds provided under the CSBG Grant Agreement shall report on the national Results Oriented Management and Accountability \(ROMA\) goals and national performance indicators. The ROMA System is woven into the entire design of the CSBG program in WV; from submission of annual grant applications by CEEs, to consistent data entry, documentation of services and outcomes, and regular reporting along the way. The State is partnering with the WV Community Action Partnership to lead the WV ROMA Task Force designated to guide the direction of ROMA implementation among WV CSBG eligible entities \(CEEs\). The Task Force is made up of Nationally Certified ROMA Trainers \(NCRTs\) and Nationally Certified ROMA Implementers \(NCRIIs\). Currently, 11 of 16 CEEs are represented on the Task Force. The State office has 1 NCRTs and the Association has 1 NCRT that work together to coordinate the activities and training of the WV ROMA Task Force.\]](#)

**13.1b. Alternative System Description:** If an alternative system was chosen in Item 13.1, describe the system the state will use for performance measurement. [\[N/A\]](#)

- 13.2. Outcome Measures:** Indicate and describe the outcome measures the state will use to measure eligible entity performance in promoting self-sufficiency, family stability, and

community revitalization, as required under Section 676(b)(12) of the CSBG Act. [\[Select one and provide a narrative, 4000 characters\]](#)

**Note:** This response will also link to the corresponding assurance, Item 14.12.

- ☒ CSBG National Performance Indicators (NPIs)
- ☐ NPIs and others
- ☐ Others

- 13.3. Eligible Entity Support:** Describe how the state supports the eligible entities in using ROMA or an alternative performance management system. [\[The State supports the eligible entities in using the ROMA system by having 1 certified ROMA trainer on staff to provide ROMA training and technical assistance when needed. The State will also have a Nationally Certified ROMA Implementer on staff beginning in FFY 2022. The State utilizes a portion of the 5% CSBG discretionary funding to provide a statewide database system to the network that has been designed to function within the ROMA system; including the use of Logic Models, Scales and Matrices, tracking of services and results, planning and evaluation tools. The State provides regular training on the use of the data system. The State has also established a ROMA task force in cooperation with the WV Community Action Partnership that focuses on improving the ROMA system in the state for all CEEs and guiding state policy for promoting results orientation.\]](#)

**Note:** The activities described under Item 13.3 may include activities listed in “Section 8: Training and Technical Assistance.” If so, mention briefly, and/or cross-reference as needed. This response will also link to the corresponding assurance, Item 14.12.

- 13.4. Eligible Entity Use of Data:** Describe how the state intends to validate that the eligible entities are using data to improve service delivery. [\[As part of the CSBG Application for funding, a Community Action Plan is submitted that requires CEEs to report on their programs and where improvements need to be made. This is in combination with submission of ROMA Logic Models that provide data which is critical to a plan for improvement. The State mandates the use of an electronic statewide data reporting system that is a valuable resource of data. The system is equipped to produce regular grant reporting as well as ad hoc reporting of any data point entered the system. The State has worked with the State Association to provide training on analysis of data and is also working to hire a consultant that will work with CEEs to develop dashboards and scorecards for regular data analysis. The State has implemented changes to the state data management system that will allow for more precise and specific feedback on individual CSBG Annual Report submissions. This process began with the submission of the FFY2020 CSBG Annual Report and will be expanded to be more comprehensive and hopefully more helpful to CEEs to improve reporting.\]](#)

**Note:** This response will also link to the corresponding assurance, Item 14.12.

## Community Action Plans and Needs Assessments

- 13.5. Community Action Plan:** Describe how the state will secure a Community Action Plan from each eligible entity, as a condition of receipt of CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act. [The State will secure a Community Action Plan from each eligible entity, as a condition of receipt of CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act. A Community Action Plan is required as part of the annual application for funding. The State has developed a template that CEEs use to present their plan. To satisfy this requirement, the State requires detailed information on each eligible entity program/initiative that meets the service delivery goals of the entity and the Community Services Block Grant assurances. CEEs are required to complete the following outline for each program/initiative. 1. Agency Program Name: A. Primary Funding: Includes the primary source of funds dedicated to the program and the amount. B. CSBG funding: Includes the amount of new grant year CSBG funds, carryover CSBG funds, and CARES Act funds allocated to the program. C. Additional funding: Includes any additional funding sources dedicated to the program and the amount allocated for each source. D. Projected # of Participants: Includes the number of participants expected to enroll in the program. E. CSBG Service Category: Employment | Education | Income Mgt. | Health | Housing | Linkages | Emergency Services | Nutrition | Self-Sufficiency | Other F. Demographic Category: Youth | Senior | N/A G. Counties Served: Includes each county served by this program. H. Eligibility Requirements: Includes the eligibility requirements for participants to receive services? (Example: Household income required to be less than 125% of poverty; household cannot receive greater than \$100 in emergency assistance per year, etc.) I. Narrative response to determine if the program addresses a need identified in the entity's most recent Community Assessment? Includes why the agency is providing this program to the community. If the need was not identified in the recent Community Assessment, an explanation is required. J. Includes the goals of the program/initiative? If this is a recurring program, explains how the goals of the previous program year were or were not met. K. If the goals were not met, the plan includes the entity's plans to ensure that goals are met for the plan year? L. Includes any organizations the entity is partnering with to provide the services and includes the primary focus of the partnership and whether a formal agreement exists. Each Individual/Family level program also requires the completion of a ROMA Logic Model. These items are submitted by each CEE and reviewed by the State Office.]

**Note:** This response will link to the corresponding assurance, Item 14.11.

- 13.6. Community Needs Assessment:** Describe how the state will assure that each eligible entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity's Community Action Plan, as required by Section 676(b)(11) of the CSBG Act. [The State will assure that each eligible entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity's Community Action Plan, as required by Section 676(b)(11) of the CSBG Act. The State requires the submission of a Certification of Needs Assessment form as part of the application for CSBG funding to ensure that the assessment has been completed as well as the method of doing so. The full assessment is reviewed during regular comprehensive monitoring of the CEE.]

**Note:** This response will link to the corresponding assurance, Item 14.11.

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

**14.1. Use of Funds Supporting Local Activities**

***CSBG Services***

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

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

[The State reviews eligible entities' annual grant applications to assure "that funds made available through grant or allotment will be used for the purpose outlines in 675(b)(1)(A). Where entities are not providing direct services, they are to explain how they partner with other providers in the community to meet the need through programs "to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals,

migrant or seasonal farm workers, and elderly low-income individuals and families." Each CEE provides a unique and individualized approach to using CSBG funds for this purpose.]

### ***Needs of Youth***

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

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

[The State reviews eligible entities' annual grant applications to assure "that funds made available through grant or allotment will be used for the purpose outlines in 676(b)(1)(B). Where entities are not providing direct services, they are to explain how they partner with other providers in the community to meet the need through program "to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime." Each CEE provides a unique and individualized approach to using CSBG funds for this purpose.]

### ***Coordination of Other Programs***

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

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

[The State reviews eligible entities' annual grant applications to assure that support activities are designed to meet the requirement outlined in section 676(b)(1)(C) of the CSBG Act, which includes making more effective use of, and to coordinate with, other programs related to the purposes of this subtitle (including state welfare reform efforts). Each CEE provides a unique and individualized approach to using CSBG funds for this purpose.]

### ***State Use of Discretionary Funds***

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



based initiatives related to the purposes of this subtitle.”

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

[No response as the state describes this assurance under 7.9 and 7.10.]

### ***Eligible Entity Service Delivery, Coordination, and Innovation***

#### ***Eligible Entity Service Delivery System***

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

[WV CEEs are required by the State to utilize a central data management system in which applicants are verified and unduplicated. The system allows customers of community action to be transferred seamlessly from CEE to CEE without interruption to services and determine eligibility for each agency program based on measurable criteria. The data management system provides the tools and resources to deliver services across the entire state and also serves as a powerful referral tool for resources outside of community action when needed. Each eligible entity in West Virginia describes their specific approach to service delivery in their annual CSBG application through the completion of a comprehensive Community Action Plan along with supporting ROMA logic models. Each entity has the ability to tailor their service delivery system to the needs of the local community.]

#### ***Eligible Entity Linkages – Approach to Filling Service Gaps***

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

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

[No response as the state describes this assurance under 9.3b.]

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

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

**Note:** The state describes this assurance in the State Linkages and Communication section, item 9.7.

[No response as the state describes this assurance under 9.7]

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

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

**Note:** The description above is about eligible entity use of 90 percent funds to support these initiatives. States may also support these types of activities at the local level using state remainder/discretionary funds, allowable under Section 675C(b)(1)(F). In this State Plan, the state indicates funds allocated for these activities under item 7.9(f).

[The State reviews eligible entities annual grant applications to assure that the local entity will use the funds [made available under 675C(a)] to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle. Where entities are not providing direct services, they are to explain how they partner with other providers in the community to meet the need through programs "which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting. Each CEE provides a unique and individualized approach to using CSBG funds for this purpose. Specific programs provided by CEEs in the state that have a goal of strengthening families and encouraging parenting include: - 1 CEE provides the Birth to Three program - 2 CEEs provide parenting support programs - 4 CEEs provide Right from the Start program - 6 CEEs provide Early Head Start program - 9 CEEs provide Head Start, which includes a specific focus area on fatherhood/parental responsibility. Several CEEs partner with WV's Family Resource Networks across the state to provide resources for parents including hosting an annual Community Baby Shower, through which community partners come together to support and strengthen families with supplies and information needed by families with babies.]

***Eligible Entity Emergency Food and Nutrition Services***

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

[The State reviews eligible entities annual CSBG applications to assure that that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals. Where entities are not providing direct services, they are to explain how they partner with other providers in the community to meet the need "on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals." Each CEE provides a unique and individualized approach to using CSBG funds for this purpose.]

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

- 14.1. 676(b)(5)** Describe how the state will assure “that the State and eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services, and [describe] how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 3 of the Workforce Innovation and Opportunity Act, in the State and in communities with entities providing activities through statewide and local workforce development systems under such Act.”

**Note:** The state describes this assurance in Section 9, State Linkages and Communication, specifically under 9.1 – 9.4b.

[No response as the state describes this assurance under Section 9.1 – 9.4b]

***State Coordination/Linkages and Low-income Home Energy Assistance***

- 14.2. 676(b)(6)** Provide “an assurance that the State will ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low- income home energy assistance) are conducted in such community.”

**Note:** The state describes this assurance in Section 9, State Linkages and Communication section, items 9.2 and 9.5.

[No response as the state describes this assurance under 9.2 and 9.5]

***Federal Investigations***

- 14.3. 676(b)(7)** Provide “an assurance that the State will permit and cooperate with Federal investigations undertaken in accordance with section 678D.”

**Note:** The state addresses this assurance in Section 10, Fiscal Controls and Monitoring under 10.13.

[No response as the state describes this assurance under 10.13]

***Funding Reduction or Termination***

- 14.4. 676(b)(8)** Provide “an assurance that any eligible entity in the State that received funding in the previous fiscal year through a community services block grant made under this subtitle will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b).”

**Note:** The state addresses this assurance in Section 10 Fiscal Controls and Monitoring under 10.7.

[No response as the state describes this assurance under 10.7]

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

- 14.5. 676(b)(9)** Describe how the state will assure “that the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations.”

**Note:** The state describes this assurance in Section 9 State Linkages and Communication, under 9.6.

[\[No response as the state describes this assurance under 9.6\]](#)

***Eligible Entity Tripartite Board Representation***

- 14.6. 676(b)(10)** Describe how “the State will require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation.”

**Note:** The state describes this assurance in Section 11 Eligible Entity Tripartite Boards, under 11.3.

[\[No response as the state describes this assurance under 11.3\]](#)

***Eligible Entity Community Action Plans and Community Needs Assessments***

- 14.7. 676(b)(11)** Provide “an assurance that the State will secure from each eligible entity in the State, as a condition to receipt of funding by the entity through a community services block grant made under this subtitle for a program, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs.”

**Note:** The state describes this assurance in Section 13 ROMA, under 13.5 and 13.6.

[\[No response as the state describes this assurance under 13.5 and 13.6\]](#)

***State and Eligible Entity Performance Measurement: ROMA or Alternate system***

- 14.8. 676(b)(12)** Provide “an assurance that the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to section 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and [describe] outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization.”

**Note:** The state describes this assurance in Section 13 ROMA under 13.1 – 13.4.

[No response as the state describes this assurance under 13.1 – 13.4]

***Validation for CSBG Eligible Entity Programmatic Narrative Sections***

**14.9. 676(b)(13)** Provide “information describing how the State will carry out the assurances described in this section.”

**Note:** The state provides information for each of the assurances directly in section 14 or in corresponding items throughout the State Plan, which are included as hyperlinks in section 14.

[No response for this item]

☒ By checking this box, the state CSBG authorized official is certifying the assurances set out above.

## SECTION 15: Federal Certifications

*The box after each certification must be checked by the State CSBG authorized official.*

### 15.1. Lobbying

#### ***Certification for Contracts, Grants, Loans, and Cooperative Agreements***

The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### ***Statement for Loan Guarantees and Loan Insurance***

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

- ☒ By checking this box, the state CSBG authorized official is providing the certification set out above.

## 15.2. Drug-Free Workplace Requirements

This certification is required by the regulations implementing the Drug-Free Workplace Act of 1988: 45 CFR Part 76, Subpart, F. Sections 76.630(c) and (d)(2) and 76.645 (a)(1) and (b) provide that a Federal agency may designate a central receipt point for STATE-WIDE AND STATE AGENCY-WIDE certifications, and for notification of criminal drug convictions. For the Department of Health and Human Services, the central point is: Division of Grants Management and Oversight, Office of Management and Acquisition, Department of Health and Human Services, Room 517-D, 200 Independence Avenue, SW Washington, DC 20201.

### ***Certification Regarding Drug-Free Workplace Requirements*** (Instructions for Certification)

- (1) By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.
- (2) The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
- (3) For grantees other than individuals, Alternate I applies.
- (4) For grantees who are individuals, Alternate II applies.
- (5) Workplaces under grants, for grantees other than individuals, need to be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
- (6) Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio studios).
- (7) If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).
- (8) Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

**Controlled substance** means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

**Conviction** means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

**Criminal drug statute** means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;



Employee means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All direct charge employees; (ii) All indirect charge employees unless their impact or involvement is insignificant to the performance of the grant; and, (iii) Temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

### ***Certification Regarding Drug-Free Workplace Requirements***

#### **Alternate I. (Grantees Other Than Individuals)**

The grantee certifies that it will or will continue to provide a drug-free workplace by:

- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (b) Establishing an ongoing drug-free awareness program to inform employees about - -
  - (1) The dangers of drug abuse in the workplace;
  - (2) The grantee's policy of maintaining a drug-free workplace;
  - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
  - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will - -
  - (1) Abide by the terms of the statement; and
  - (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- (e) Notifying the agency in writing, within 10 calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
- (f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -
  - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code) [\[Narrative, 2500 characters\]](#)

- ☐ Check if there are workplaces on file that are not identified here. Alternate II. (Grantees Who Are Individuals)
- (a) The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;
- (b) If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other designee, unless the Federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.

[55 FR 21690, 21702, May 25, 1990]

- ☒ By checking this box, the state CSBG authorized official is providing the certification set out above.

### **15.3. Debarment**

#### ***CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS***

##### ***Certification Regarding Debarment, Suspension, and Other Responsibility Matters — Primary Covered Transactions***

###### Instructions for Certification

- (1) By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.
- (2) The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.
- (3) The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.
- (4) The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
- (5) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.
- (6) The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.
- (7) The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusive-Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

- (8) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.
- (9) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
- (10) Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

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***Certification Regarding Debarment, Suspension, and Other Responsibility Matters — Primary Covered Transactions***

- (1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:
  - (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;
  - (b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
  - (c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
  - (d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.
- (2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

***Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion — Lower Tier Covered Transactions***

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
- (2) The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
- (3) The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.
- (4) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.
- (5) The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.
- (6) The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
- (7) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.
- (8) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

- (9) Except for transactions authorized under paragraph five of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

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***Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion — Lower Tier Covered Transactions***

- (1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.
- (2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.
- ☒ By checking this box, the state CSBG authorized official is providing the certification set out above.

#### **15.4. Environmental Tobacco Smoke**

Public Law 103227, Part C Environmental Tobacco Smoke, also known as the Pro Children Act of 1994, requires that smoking not be permitted in any portion of any indoor routinely owned or leased or contracted for by an entity and used routinely or regularly for provision of health, day care, education, or library services to children under the age of 18, if the services are funded by Federal programs either directly or through State or local governments, by Federal grant, contract, loan, or loan guarantee. The law does not apply to children's services provided in private residences, facilities funded solely by Medicare or Medicaid funds, and portions of facilities used for inpatient drug or alcohol treatment. Failure to comply with the provisions of the law may result in the imposition of a civil monetary penalty of up to \$1000 per day and/or the imposition of an administrative compliance order on the responsible entity by signing and submitting this application the applicant/grantee certifies that it will comply with the requirements of the Act.

The applicant/grantee further agrees that it will require the language of this certification be included in any subawards which contain provisions for the children's services and that all subgrantees shall certify accordingly.

☒ By checking this box, the state CSBG authorized official is providing the certification set out above.







## Community Services Block Grant

### Information Memorandum | Transmittal No. 2021-2

To: WV Community Services Block Grant Eligible Entities  
From: Jennifer Ferrell, Director (WVCAD)  
WV Department of Economic Development  
Community Advancement and Development  
Date: 09/01/2021  
Subject: CSBG Monitoring Policy

#### Purpose:

The State Office is committed to the diligent adherence to the requirements of Section 678B (a) of the Community Services Block Grant (CSBG) Act. Monitoring is one of the most important forms of support the State Office can provide to subrecipients. While the basic obligation of monitoring is to assess compliance, the State Office also views monitoring as a continuing opportunity to learn about the subrecipient, the communities it serves, and to offer technical assistance or provide support to the entity as requested.

#### Procedure:

##### Types of State Monitoring

The State Office will conduct the following types of monitoring of CSBG subrecipients.

- a) Biannual Comprehensive Monitoring: In compliance with the CSBG Act, the State Office will conduct a comprehensive monitoring biannually. The purpose of the monitoring is to assess compliance of the eligible entity with the programmatic and fiscal requirements of the CSBG Act, as well as an assessment of the CSBG Organizational Standards. This monitoring will be conducted in accordance with the guidance provided in Information Memorandum Transmittal No. 97, dated October 10, 2006.
- b) New Eligible Entity Monitoring: An onsite review of each newly designated eligible entity is conducted immediately after the completion of the first year in which such entity receives funds through the Community Services Block Grant program.
- c) Follow-up Monitoring: Follow-up reviews will occur for subrecipients, and their programs that fail to meet the goals, standards, and requirements established by the State. If the on-site monitoring reveals serious deficiencies and/or deficiencies are not corrected in a timely manner in accordance with requirements, the State Office will conduct a follow-up on-site monitoring review and provide training and technical assistance as deemed necessary.
- d) Additional Monitoring: Other reviews are conducted as appropriate. These might include reviews of CSBG subrecipients with programs that have had other Federal, state, or local grants (other than assistance provided under the Community Services Block Grant program) terminated for cause. ('676B(a) When a CSBG subrecipient is experiencing problems with programs other than CSBG, the State Office will conduct additional reviews and maintain close contact with the entity to ensure that state staff members are available to provide training and technical assistance as deemed necessary for the CSBG program operations.
- e) The State also conducts routine in-house desk reviews which include an examination of performance and expenditure rates based on monthly reports submitted to the State Office by each subrecipient and a review of periodic outcome and performance data.

## **Pre-Monitoring Procedures**

The State Office will provide timely notification of monitoring of subrecipients and complete some parts of the monitoring prior to arriving on-site for monitoring. Those activities include:

- a) Distribute notification of monitoring at least 30 days prior to on-site monitoring to the Executive Director, CFO, and CSBG designated point of contact. The subrecipient should confirm receipt of the notification and respond within 48 hours if the dates for monitoring need to be changed for any reason. Provision of a 30-day notice may not be possible for Follow-up monitoring or Additional monitoring.
- b) Once the dates of monitoring have been confirmed, the subrecipient will prepare and send the items requested in the official notification of monitoring by the deadline indicated in the notification.
- c) Once the documents are received, a monitoring team member will confirm receipt of the documents.
- d) During the week prior to on-site monitoring, the State Office monitoring team will request any additional information needed from the subrecipient and confirm arrival times and any necessary logistics.

## **On-site Monitoring Procedures**

The State Office will make all efforts to conduct an on-site monitoring as indicated in the Types of Monitoring listed above. A typical visit can be expected to require three (3) to five (5) days on-site. The State Office reserves the right to conduct comprehensive monitoring virtually if necessary. If monitoring must be conducted virtually due to extenuating circumstances, the monitoring may take longer. Monitoring types a, b, and d noted above will usually consist of the following:

- a) Entrance and Exit meetings.
- b) Review of subrecipient policies and procedures, governance documents, personnel documents, program documents, and other documentation as needed.
- c) Interviews with program staff regarding program operations and job functions.
- d) Interviews with administrative and fiscal staff.
- e) Interviews with members of the tripartite board of directors.

## **Post-Monitoring Procedures**

The State Office will provide timely feedback to subrecipients on the results of each monitoring visit with an opportunity for the monitored entity to respond to all observations, concerns, and findings.

- a) After an on-site monitoring visit, the monitoring team will provide a written monitoring report to the entity's executive director and board president within 60 calendar days those documents observations, concerns, and findings. A copy of the monitoring report is also provided to the presiding officer and/or the entity's governing board at the discretion of the State Office.
  - Monitoring Reports will make note of any previous findings in addition to current monitoring observations, concerns, and findings.
  - Depending on the severity of findings, a QIP may or may not be required. If a QIP is required, a QIP document will be provided with the final monitoring report
- b) Subrecipients are required to respond to findings within an assigned timeframe, typically 30 days to assure the 60-day timeframe as described in authorizing statute is met.
- c) The State Office monitoring team will evaluate the adequacy of the responses and corrective action. Approval of the proposed quality improvement plan will occur within 30 days of receiving the entity's response. The entity will be informed of any deficiencies the State Office has deemed to be corrected at the time of approval and/or deficiencies that will require follow-up monitoring from the State Office.
- d) If the subrecipient's response is not sufficient to correct the deficiencies, the State Office monitoring team will work with the entity to formulate an appropriate plan to correct the identified deficiencies.

- e) The State Office will offer and provide training and technical assistance as appropriate in situations described in (c) and (d) of this section.
- f) If a subrecipient's response is to contest an identified deficiency, the State Office will either sustain or revise its initial deficiency finding and provide additional guidance or instructions.
- g) If the subrecipient fails to respond within the assigned timeframe, the State Office will contact the subrecipient to remind them of the requirement to respond to the identified deficiencies and outline the actions the State Office will take if the entity continues not to respond. The subrecipient will have a week grace period starting from the reminder date to submit their response to the State Office. The subrecipient will also be required to provide an explanation as to why they failed to respond during the initial timeframe.
- h) If the subrecipient fails to respond within the week grace period, the State Office will consider initiating termination procedures taking into account the seriousness of the deficiency identified, the subrecipient's communication with the State Office throughout the monitoring process, the possibility for the entity to still meet the statutory 60-day timeframe to initiate corrective actions and past performance.
- i) A follow-up on-site or desk monitoring will be scheduled as deemed necessary to ensure that deficiencies have been corrected. Once the State Office monitoring team has determined that all deficiencies have been corrected, the entity will be informed, and the Quality Improvement Plan will be closed.

### **Desktop Monitoring Procedures**

The State Office will use periodic desktop monitoring reviews as to assist subrecipients in maintaining compliance with data management system requirements, and other areas where the State Office sees room for improvement by Subrecipients. Generally, these types of desktop reviews will not result in official monitoring reports but may require corrections from the subrecipient.

### **Corrective Action, Termination and Reduction of Funding**

If the State determines, on the basis of a final decision in a review pursuant to section 678B of the CSBG Act, that a subrecipient fails to comply with the terms of an agreement, or the State plan, to provide services under this subtitle or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives), the State shall:

- a) Inform the entity of the deficiency to be corrected;
- b) Require the entity to correct the deficiency;
- c) Offer training and technical assistance, if appropriate, to help correct the deficiency, and submit to the Secretary a report describing the training and technical assistance offered or stating the reasons for determining that training and technical assistance are not appropriate.
- d) At the discretion of the State (taking into account the seriousness of the deficiency and the time reasonably required to correct the deficiency), allow the entity to develop and implement within 60 days after being informed of the deficiency, a quality improvement plan to correct such deficiency within a reasonable period of time, as determined by the State; and
- e) Not later than 30 days after receiving from a subrecipient, a proposed quality improvement plan pursuant to paragraph (d), either approve such proposed plan or specify the reasons why the proposed plan cannot be approved; and
- f) After providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding to the subrecipient unless the entity corrects the deficiency. (678(C)(a))
- g) REVIEW—A determination to terminate the designation or reduce the funding of a subrecipient is

reviewable by the Department of Health and Human Services, Administration for Children and Families, Office of Community Services (OCS). The OCS shall, upon request, review such a determination. The review shall be completed not later than 90 days after the OCS receives from the State all necessary documentation relating to the determination to terminate the designation or reduce the funding. If the review is not completed within 90 days, the determination of the State shall become final at the end of the 90th day.

- h) DIRECT ASSISTANCE—Whenever a State violates the assurances contained in section 676(b)(8) and terminates or reduces the funding of a subrecipient prior to the completion of the State hearing described in that section and the OCS's review as required in subsection (b), the OCS is authorized to provide financial assistance under this subtitle to the subrecipient affected until the violation is corrected. In such a case, the grant or allotment for the State under section 675A or 675B for the earliest appropriate fiscal year shall be reduced by an amount equal to the funds provided to such subrecipient.

### **Effective Date:**

The policies and procedures outlined in this Information Memorandum will officially go into effect beginning FFY 2022.