

2020-2021

West Virginia

CSBG State Plan

WV

West Virginia Development Office
Community Advancement & Development



Community Services Block Grant (CSBG) State Plan Draft Version: (08/12/2019)

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Mandatory Grant Application SF-424

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- 1.3:** Designation Letter from Governor of WV
- 4.4a:** Public Hearing Announcement & Transcript
- 4.4b:** Legislative Hearing Announcement & Minutes
- 7.9f:** FY2020-2021 Discretionary Grant Application for Innovative Programs/Activities by Eligible Entities
- 10.2:** CSBG WV IM 2017-01 “State CSBG Monitoring Policies”
- 12.1a** CSBG WV IM 2017-02 “Determining Client Eligibility for CSBG”

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

- 1.1.** The following information is related to the lead agency designated to administer CSBG in the State, as required by Section 676(a) of the CSBG Act. The following information mirrors the information provided on the Application for Federal Assistance, SF-424M.
- 1.1a. Lead agency:** The West Virginia Development Office (WVDO) has been designated by the Governor, Jim Justice of West Virginia to act as the lead agency for the administration of the Community Services Block Grant (CSBG).
 - 1.1b. Cabinet or administrative department of this lead agency:** Department of Commerce
 - 1.1c. Division, bureau, or office of the CSBG authorized official:** West Virginia Development Office – Community Advancement and Development
 - 1.1d. Authorized official of the lead agency:** Ms. Jennifer Ferrell
 - 1.1e. Street address:** 1900 Kanawha Blvd. East, Building 3, Suite 700
 - 1.1f. City:** Charleston
 - 1.1g. State:** West Virginia
 - 1.1h. Zip:** 25305
 - 1.1i. Telephone number and extension:** 304-957-2019
 - 1.1j. Fax number:** 304-558-3248
 - 1.1k. Email address:** Jennifer.L.Ferrell@wv.gov
 - 1.1l. Lead agency website:** <http://wvcad.org>
- 1.2.** The following information is related to the designated State CSBG point of contact.
- 1.2a. Agency name:** WV Development Office – Community Advancement and Development
 - 1.2b. Name of the point of contact:** Ms. Shelly Woda
 - 1.2c. Street address:** 1900 Kanawha Blvd. East, Building 3, Suite 700
 - 1.2d. City:** Charleston
 - 1.2e. State:** West Virginia
 - 1.2f. Zip:** 25305
 - 1.2g. Point of contact telephone number:** 304-957-2075
 - 1.2h. Fax number:** 304-558-3248
 - 1.2i. Point of contact email address:** Shelly.J.Woda@wv.gov
 - 1.2j. Point of contact agency website:** <http://wvcad.org>
- 1.3. Designation Letter:** Attach the State’s official CSBG designation letter. If either the governor or designated agency has changed, update the letter accordingly.

Attachment 1.3 – FY2020-2021 CSBG Designation Letter

SECTION 2

State Legislation and Regulation

- 2.1. **CSBG State Legislation:** The State does not have a statute authorizing CSBG.
- 2.2. **CSBG State Regulation:** The State does not have regulations for CSBG.
- 2.3. N/A
- 2.4. **State Authority:** Select a response for each question about the State statute and/or regulations authorizing CSBG:
 - 2.4a. The State legislature did not enact authorizing legislation, or amendments to an existing authorizing statute, last year.
 - 2.4b. The State did not establish or amend regulations for CSBG last year.
 - 2.4c. The State statutory or regulatory authority did not designate the bureau, division, or office in the State government that is to be the State administering agency.

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SECTION 3

State Plan Development and Statewide Goals

3.1. CSBG Lead Agency Mission and Responsibilities: The Community Advancement and Development Division of the West Virginia Development Office provides resources and support for a community of partners working to improve the lives of West Virginians.

3.2. State Plan Goals:

The goals of the State CSBG Office are:

(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 annually and provide Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs) for improvement.

(7) To provide training and resources to CEEs to complete the Organizational Standards electronic Self-assessment.

(8) To continue working with all WV CSBG Eligible Entities toward meeting 100% of the Organizational Standards by the end of FY2020.

(9) 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)].

(10) 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.

(11) To provide regular training opportunities on topics crucial to the successful implementation of CSBG, including at a minimum; CSBG Application training, IS Report training, Grant Financial Tracking/Invoicing training, Organizational Standards training, and ROMA training.

3.3. State Plan Development

- 3.3a.** The State analyzed internal policies including; CSBG Monitoring Procedures, WV joint TTA plan, past discretionary spending records, CSBG ROMA policies, established funding formula, hearing minutes, and eligible entity plans to develop this State Plan.
- 3.3b.** The State consulted with eligible entities via the West Virginia Annual Training Conference and regular meetings with CEE Executive Directors, as well as the State community action association for the development of this State Plan.

3.4. Eligible Entity Involvement

- 3.4a.** The State office conducted face-to-face meetings with CEE Executive directors at least quarterly 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 was also involved in these discussions. 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 2020-2021.
- 3.4b.** WV's 2017 ACSI was utilized in the Development of this Plan. and made significant adjustments to the way the program is administered, and especially to the level of participation expected from the eligible entities. Regular CSBG meetings with the CEE executive directors allowed for ongoing discussion on areas such as distribution of funds, use of discretionary funding, provision of training and technical assistance, monitoring procedures, regular communication. The meetings have been very successful, and encouraged dialogue in a cooperative environment to promoted positive change. Going forward, information from the 2017 ACSI will be considered when setting priorities for the administration of CSBG in cooperation with the Eligible Entities.

3.5. Eligible Entity Overall Satisfaction

The State's target for eligible entity Overall Satisfaction during the performance period is 85.

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:** The State Plan was made available on the State office website (<http://wvcad.org>) on August 12, 2019, and CSBG Eligible Entities were made aware of the posting.
- 4.2. Public Notice/Hearing:** The plan was made available two weeks prior to the hearing and the public was notified by ads in 8 major newspapers throughout the state. Ads were run 2 weeks prior to the hearing for up to 3 consecutive days.
- 4.3. Public and Legislative Hearings:**

Date	Location	Type of Hearing [Select an option]
1) August 27, 2019	1) 1900 Kanawha Blvd. East, Building 3, Charleston, WV 25305	1) Public
2) January 9, 2019	2) 1900 Kanawha Blvd. East, Building 1, Charleston, WV 25350	2) Legislative

- 4.4.** Minutes of the hearings are attached
 - Attachment 4.4.a:** Public Hearing Minutes
 - Attachment 4.4.b:** Legislative Hearing Minutes

SECTION 5 CSBG Eligible Entities

5.1. CSBG Eligible Entities:

CSBG Eligible Entity	Public or Nonprofit	Type of Entity (choose all that apply)	Geographical Area Served by county (Provide all counties)	Brief Description of "Other"
Central WV Community Action, Inc.	Nonprofit	Community Action Agency	(2) Lewis, Harrison	N/A
CHANGE, Inc.	Nonprofit	Community Action Agency	(4) Brooke, Hancock, Marshall, Ohio	N/A
Coalfield Community Action Partnership, Inc.	Nonprofit	Community Action Agency	(1) Mingo	N/A
Community Action of South Eastern West Virginia, Inc.	Nonprofit	Community Action Agency	(3) Mercer, Monroe, Summers	N/A
Community Resources, Inc.	Nonprofit	Community Action Agency	(11) Calhoun, Doddridge, Gilmer, Jackson, Pleasants, Ritchie, Roane, Tyler, Wetzel, Wirt, Wood	N/A
Council of the Southern Mountains, Inc.	Nonprofit	Community Action Agency	(1) McDowell	N/A
Eastern WV Community, Action Agency, Inc.	Nonprofit	Community Action Agency	(6) Grant, Hampshire, Hardy, Mineral, Morgan, Pendleton	N/A
EnAct, Inc.	Nonprofit	Community Action Agency	(5) Boone, Clay, Fayette, Kanawha, Putnam	N/A
Mountain CAP of West Virginia, Inc.	Nonprofit	Community Action Agency	(3) Braxton, Upshur, Webster	N/A
MountainHeart Community Services, Inc.	Nonprofit	Community Action Agency	(1) Wyoming	N/A
Nicholas Community Action Partnership, Inc.	Nonprofit	Community Action Agency	(1) Nicholas	N/A
North Central WV Community Action Association, Inc.	Nonprofit	Community Action Agency	(9) Barbour, Greenbrier, Marion, Monongalia, Pocahontas, Preston, Randolph, Taylor, Tucker	N/A
PRIDE Community Services, Inc.	Nonprofit	Community Action Agency	(1) Logan	N/A
Raleigh County Community Action Association, Inc.	Nonprofit	Community Action Agency	(1) Raleigh	N/A
Southwestern Community Action Council, Inc.	Nonprofit	Community Action Agency	(4) Cabell, Lincoln, Mason, Wayne	N/A
Telamon Corporation	Nonprofit	Community Action Agency	(2) Berkeley, Jefferson	N/A

5.2. Total number of CSBG eligible entities: 16

5.3. Changes to Eligible Entities List: There have been no changes to the list of eligible entities since the last State Plan submitted for FY2018-2019.

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

6.2. The State is using the COE-developed organizational standards and does not propose making a minor modification to the standards, as described in IM 138.

6.2a. N/A

6.3. The State has officially adopted organizational standards for eligible entities in the State through the distribution of a State Information Memorandum. Compliance with the Organizational Standards will also be a requirement of the CSBG grant agreement between the State and CEEs.

6.4. The State plans to utilize eligible entity self-assessment with validation by the State on an annual basis as described in IM 138.

6.4a. Description of the assessment process: The State is responsible for assessing the status of standards among all the eligible entities annually and for reporting to OCS on the standards in the CSBG Annual Report. Eligible entities will have six months each year to complete an electronic self-assessment. The State will have 6 months to complete a comprehensive desk review of the self-assessments, and provide feedback through a Technical Assistance Plan or Quality Improvement Plan. 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.

6.5. The State will not make exceptions in applying the organizational standards for any eligible entities due to special circumstances or organizational characteristics, as described in IM 138.

6.6. Performance Target: The State expects that 88% of eligible entities will meet all the State-adopted organizational standards in 2020

Note: This information is associated with State Accountability Measure 6Sa and may pre-populate the State's annual report form.

SECTION 7 State Use of Funds

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

7.1 Formula: The State utilizes the method (formula) known as “Base + Formula” for allocating CSBG funds to eligible entities.

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.

7.1b. Statute: The State statutory or regulatory authority does not specify the terms or formula for allocating the 90 percent funds among eligible entities.

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

Planned CSBG 90 Percent Funds		
CSBG Eligible Entity	Year One	Year Two
	Funding Amount \$	Funding Amount \$
Central WV Community Action, Inc.	\$ 354,694.00	\$ 354,694.00
CHANGE, Inc.	\$ 444,377.00	\$ 444,377.00
Coalfield Community Action Partnership, Inc.	\$ 245,054.00	\$ 245,054.00
Community Action of South Eastern West Virginia, Inc.	\$ 416,817.00	\$ 416,817.00
Community Resources, Inc.	\$ 704,517.00	\$ 704,517.00
Council of the Southern Mountains, Inc.	\$ 249,226.00	\$ 249,226.00
Eastern WV Community Action Agency, Inc.	\$ 414,977.00	\$ 414,977.00
EnAct, Inc.	\$ 901,476.00	\$ 901,476.00
Mountain CAP of West Virginia, Inc.	\$ 292,417.00	\$ 292,417.00
MountainHeart Community Services, Inc.	\$ 224,368.00	\$ 224,368.00
Nicholas Community Action Partnership, Inc.	\$ 218,268.00	\$ 218,268.00
North Central WV Community Action Association, Inc.	\$ 957,195.00	\$ 957,195.00
PRIDE Community Services, Inc.	\$ 257,832.00	\$ 257,832.00
Raleigh County Community Action Association, Inc.	\$ 348,811.00	\$ 348,811.00
Southwestern Community Action Council, Inc.	\$ 714,876.00	\$ 714,876.00
Telamon Corporation	\$ 460,597.00	\$ 460,597.00
TOTALS	\$7,205,502.00	\$7,205,502.00

7.3. Distribution Process: 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 a CEEs 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. Typically, it will be a first quarter award. The State will not permit an entity to spend multiple allotments simultaneously. The distribution formula will be updated as new poverty data becomes available.

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

7.4a. Distribution Consistency: If no, describe state procedures to ensure funds are made available to eligible entities consistently and without interruption.

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 will not be made available prior to January 1. 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.

7.5. Performance Management Adjustment: The state does not intend to change grant and/or contract administration procedures under this State Plan as compared to past plans. Eligible entity feedback indicates high satisfaction rates for granting and fund distribution procedures.

Note: This information is associated with State Accountability Measure 2Sb and may prepopulate the State’s annual report form.

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

7.6. The State plans to allocate 5% of State CSBG funds for administrative activities, under this State Plan.

7.7. 12 State staff positions will be funded in whole or in part with CSBG funds under this State Plan.

7.8. 5.0 State Full Time Equivalent (FTEs) will be funded with CSBG funds under this State Plan.

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

7.9. The State plans to use remainder/discretionary funds as follows:

Use of Remainder/Discretionary Funds			
Remainder/ Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Year One	Year Two	Brief description of services/activities
	Planned \$	Planned \$	
a. Training/technical assistance to eligible entities	\$275,000	\$275,000	See item 8.1
b. Coordination of State-operated programs and/or local programs	\$25,000	\$25,000	See section 9, State Linkages and Communication.
c. Statewide coordination and communication among eligible entities	\$100,000	\$100,000	See section 9, State Linkages and Communication.
d. Analysis of distribution of CSBG funds to determine if targeting greatest need			
e. Asset-building programs			
f. Innovative programs/activities by eligible entities or other neighborhood groups			See Attachment 7.9f
g. State charity tax credits			
h. Other activities, specify _____			
Totals	\$400,000	\$400,000	

Attachment 7.9f: “FY 2020-2021 Discretionary Grant Application for Innovative Programs/Activities by Eligible Entities”

- 7.10.** The State plans to work with CSBG eligible entities, the WV Community Action Partnership, the WV Coalition to End Homelessness, DBA Technologies (software provider), and National technical assistance providers to carry out some or all of the activities in table 7.9.
- 7.11 Performance Management Adjustment:** The State is adjusting the use of remainder/discretionary funds under this State Plan as compared to the most recent plan. Adjustments include eliminating the opportunity for funding of innovative programs/activities and shifting those funds to increased training/technical assistance to eligible entities. The state office worked with the State Association to determine the amounts dedicated to each major use of funds.

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SECTION 8

State Training and Technical Assistance

- 8.1.** The State’s plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan is outlined in the table below.

Training and Technical Assistance			
Fiscal Year (FY) Quarter (Q) / Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
FY1 - Q1	Training	Other	Community Action Plan as part of annual Grant Application
FY1 - Q2	Training	Other	Final CSBG IS Report Training
FY1 - Q3	Technical Assistance	Organizational Standards - for eligible entities with unmet standards	
FY1 - Q3	Training	Monitoring	
FY2 - Q1	Training	Other	Community Action Plan as part of the annual Grant Application
FY1 - Q3	Technical Assistance	Organizational Standards - for eligible entities with unmet standards	
FY2 - Q3	Training	Monitoring	
Y1 - Q2	Training	Reporting	New CSBG Annual Reporting
Y1 - Q3	Training	ROMA	
FY2 - Q3	Training	ROMA	

- 8.1a.** The planned budget for the training and technical assistance plan (as indicated in the Remainder/Discretionary Funds table in item 7.9): \$275,000 **[Prepopulated with the budget allocation for years one and two under 7.9a]**
- 8.2.** The State will conduct an electronic review of CEE's annual CSBG Organizational Standards self-assessments. As a result of the review, any CEE with unmet standards will receive a TAP if the 6-month review period is not over. Once the 6-month review period has concluded, any CEE with unmet Organizational Standards remaining will be issued a Quality Improvement Plan for each standard not met. The process will be conducted in accordance with the approved Monitoring policy attached to 10.2.
- 8.3.** The State plans to provide training and/or technical assistance as described in item 8.1 directly and through partnership with the West Virginia Community Action Partnership, and national technical assistance provider(s) including NASCSP and CAPLAW.
- 8.4. Performance Management Adjustment:** The State office is working with the State Association, and R3PIC to coordinate technical assistance, with the implementation of the joint TTA Plan. The first official joint plan was submitted to the RPIC in April 2017 and proved to be very successful and well received across the state network. The State Office and State Association will be gathering soon to gauge progress on the plan, and work on a plan for FY 2020. Going forward, information from the most recent available ACSI will be considered when setting priorities for the administration of CSBG in cooperation with the Eligible Entities and the State Association.

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: The State plans to create new and maintain existing partnerships 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)). The West Virginia Development Office administers CSBG which also administers the Community Development Block Grant, State Tax Credits, Weatherization Assistance Program, Emergency Solutions Grant program, and the Housing Opportunities for Persons with AIDS program. WVDO partners with the WV Department of Health and Human Resources (DHHR) for the LIHEAP non-emergency applications, and LIHEAP weatherization funding, as well as the WV Division of Energy and the WV Workforce Development Office. WVDO also participates in the WV Interagency Council on Homelessness (made up of critical partners across the state including this office) that works to address common barriers to housing with a focus on ending homelessness in WV.

9.2. State Linkages and Coordination at the Local Level: 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 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.

9.3. Eligible Entity Linkages and Coordination

9.3a State Assurance of Eligible Entity Linkages and Coordination: 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. In Fiscal Year 2016, the eligible entities reported leveraging a total of \$96,428,947 non-Community Service Block Grant Funds to meet identified community needs.

9.3b State Assurance of Eligible Entity Linkages to Fill Service Gaps: 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 area

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 household's 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 effect maximum leveraging for CSBG funds (ROMA Goal 4: Partnerships among supporters and providers of service to low-income people are achieved, and ROMA Goal 5: Agencies increase their capacity to achieve results). CSBG funds provide the underpinning which enable 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.

9.4. Workforce Innovation and Opportunity Act (WIOA) Employment and Training Activities:

The State does not 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.

9.4a N/A

9.4b. 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.

9.5. Emergency Energy Crisis Intervention: 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 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 has been very successful and is provided by 15 of 16 WV CEEs. The program has continued to be renewed for the last 3 years and is expected to continue.

- 9.6. State Assurance: Faith-based Organizations, Charitable Groups, Community Organizations:** 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. Eligible entities 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 checks for partnerships on the annual IS Report.
- 9.7 Coordination of Eligible Entity 90 Percent Funds with Public/Private Resources:** 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.
- 9.8. Coordination among Eligible Entities and 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 and training. The association is the lead agency for ROMA training in the state. Within the year, all 16 CEEs will have a NCRT or NCRI on staff. This has been a significant effort and demonstration of partnership between the State office and association. The State office provides program updates for all association board meetings, and is available to attend if requested.
- 9.9 Communication with Eligible Entities and the State Community Action Association:** The State’s plan for communicating with eligible entities, the State Community Action Association, and other partners under this State Plan is outlined in the table below.

Communication Plan			
Topic	Expected Frequency	Format (drop down)	Brief Description of “Other”
Communication from OCS including Dear Colleague Letters and IMs	Other	Email	Will be distributed asap after receipt from OCS
CSBG Program Updates	Quarterly	Email	
State Plan	Annually	Other	Presented in an annual hearing and legislative hearing
Organizational Standards	Semi-Annually	Other	Email, Website, Meetings/Presentations
CSBG Application	Annually	Other	Email, Meeting/Presentation
Notice of Training Opportunities pertaining to Community Action	Other	Email	Distributed as information on training opportunities is made available to the State
Eligible entity Exec. Director meetings	Quarterly	Meeting/Presentation	
Program Report to WVCAP Association Board meeting	Other	Email	bi-monthly

- 9.10. Feedback to Eligible Entities and State Community Action Association:** 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 completed Module 1 of the CSBG Annual Report.

- 9.11 Performance Management Adjustment:** The State will continue to make strides toward improving communication, and based on the Summer 2017 ACSI results, may make additional adjustments to the Communication Plan. Going forward, information from the 2017 ACSI will be considered when setting priorities for the administration of CSBG in cooperation with the Eligible Entities.

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SECTION 10

Monitoring, Corrective Action, and Fiscal Controls

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

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

CSBG Eligible Entity	Review Type	Target Date	Brief Description of "Other"
Central WV Community Action Association, Inc.	Other	FY2 Q1	Annual Fiscal Review
CHANGE, Inc.	Other	FY1 Q3	Annual Fiscal Review
Coalfield Community Action Partnership, Inc.	Other	FY1 Q3	Annual Fiscal Review
Community Action of South Eastern West Virginia, Inc.	Other	FY1 Q4	Annual Fiscal Review
Community Resources, Inc.	Other	FY2 Q3	Annual Fiscal Review
Council of the Southern Mountains, Inc.	Full Onsite	FY2 Q4	
Eastern WV Community Action Agency, Inc.	Other	FY2 Q4	Annual Fiscal Review
EnAct, Inc.	Full Onsite	FY1 Q3	
Mountain CAP of West Virginia, Inc.	Full Onsite	FY1 Q3	
MountainHeart Community Services, Inc.	Other	FY2 Q3	Annual Fiscal Review
Nicholas Community Action Partnership, Inc.	Other	FY1 Q1	Annual Fiscal Review
North Central WV Community Action Association, Inc.	Full Onsite	FY1 Q2	
PRIDE Community Services, Inc.	Full Onsite	FY1 Q1	
Raleigh County Community Action Association, Inc.	Full Onsite	FY1 Q3	
Southwestern Community Action Council, Inc.	Other	FY2 Q3	Annual fiscal review
Telamon Corporation	Full Onsite	FY1 Q3	

10.2. Monitoring Policies: A copy of the State monitoring policies is attached.

Attachment 10.2: CSBG IM 2017-01 "CSBG Monitoring Policy"

10.3. Initial Monitoring Reports: According to the State's procedures, the State will disseminate initial monitoring reports to local entities within 60 days of the conclusion of on-site monitoring.

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

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

10.4a. N/A

10.5. Quality Improvement Plans (QIPs): 0(zero) eligible entities are currently on a Quality Improvement Plan.

10.6. Reporting of QIPs: The State CSBG Program or Fiscal monitor will notify its regional OCS representative of the QIP by email with 30 days of approving the QIP. The State will provide a copy of the QIP to the representative and provide additional information if requested.

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

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

10.8. The State CSBG statute and/or regulations does not provide for the designation of new eligible entities. The State uses guidance provided through the Office of Community Services' CSBG IM No. 116 Corrective Action, Termination, or Reduction of Funding; however, it intends to develop more detailed procedures for the process of designating new eligible entities when necessary.

10.9. The State CSBG statute and/or regulations does not provide for de-designation of eligible entities. The State uses guidance provided through the Office of Community Services' CSBG IM No. 116 Corrective Action, Termination, or Reduction of Funding.

10.10. The State CSBG statute and/or regulations does not specify a process the State CSBG agency must follow to re-designate an existing eligible entity. The State uses guidance provided through the Office of Community Services' CSBG IM No. 116 Corrective Action, Termination, or Reduction of Funding; however, it intends to develop more detailed procedures for the process of re-designating an existing eligible entity when necessary.

Fiscal Controls and Audits and Cooperation Assurance

10.11. Fiscal Controls and Accounting: 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 State’s 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 timely.

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: Applicable to CSBG at 45 CFR 75.521, CEE single audits are due to the State within 9 months of the end of the CEE’s fiscal year. If the deadline is not met, the State sends the CEE a reminder notice and extension request form via mail. Once a CEE submits an extension request using the “Audit Report Extension Request” form, the State will review for approval or disapproval. This form will be signed by a State authorized employee and emailed to the CEE Executive Director.

The State will verify when the audit was submitted to the Federal Clearinghouse, and note this on the “Annual Audit Chart”, maintained by the Fiscal Compliance Monitor. If the audit has not been submitted to the Federal Clearinghouse, the State will send a reminder notice before reviewing the audit.

The fiscal compliance monitor will review all audits using the “WVDO Subrecipient Audit Review Checklist.” A “Subrecipient Audit Review Summary” is completed for the audit, and maintained on the WVDO shared drive. Depending on the results of the review, the State forwards to the CEE either (1) a letter indicating acceptance of the audit package or (2) a letter issuing a management decision and requesting a Corrective Action Plan. The CEE has 6 weeks to submit a Corrective Action Plan if applicable.

If a CEE has not submitted the Corrective Action Plan within the deadline, the Corrective Action Plan “Reminder Email” will be forwarded to the Executive Director. Upon receipt of the Corrective Action Plan, the State will review and send to the CEE either an acceptance notice or another correspondence requesting modification to the Corrective Action Plan.

10.13. 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?

10.14. Performance Management Adjustment: The State has received positive feedback in meetings regarding the current monitoring procedures, and other than upkeep and regular review of policies, does not plan to make significant adjustments to the procedures at this time.

SECTION 11

Eligible Entity Tripartite Board

- 11.1.** The following measures are taken to ensure that the State verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B of the CSBG Act. 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 in the statewide data system that is reviewed in conjunction with regular on-site monitoring and in conjunction with training.
- 11.2.** The State requires all eligible entities to provide updates (e.g., copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc.) regarding their Tripartite Boards by utilization of a board tracking data system where CEEs maintain current board information including; board member profiles, board meeting records including the attachment of minutes after approved, board composition, bylaws, board training hours, and volunteer reporting.
- 11.3. Assurance on Eligible Entity Tripartite Board Representation:** 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.
- 11.4.** The State does not 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.

Section 12

Individual and Community Income Eligibility Requirements

12.1. Required Income Eligibility: The income eligibility threshold for direct CSBG services in the State of West Virginia will be 125% of the HHS poverty line.

12.1a. A copy of the Procedures for Determining CSBG Client Income Eligibility is attached.

Attachment 12.1a: CSBG IM 2017-02 “Procedures for Determining CSBG Client Income Eligibility”

12.2. Income Eligibility for General/Short Term Services: During the last plan period, the State was unable to address how it ensures eligible entities generally verify income eligibility for services with limited in-take procedures (where individual income verification is not possible or practical). The State still plans to develop guidance in this area during the period of this plan.

12.3. Community-targeted Services: During the last plan period, the State was unable to address how it ensures eligible entities generally verify income eligibility for services with limited in-take procedures (where individual income verification is not possible or practical). The State still plans to develop guidance in this area during the period of this plan.

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SECTION 13

Results Oriented Management and Accountability (ROMA) System

13.1. ROMA Participation: The State and all eligible entities will participate in The Results Oriented Management and Accountability (ROMA) performance measurement system, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act.

13.1a. The CEE certifies that all activities carried out with funds provided under the Grant Agreement shall report on each of the six national Results Oriented Management and Accountability (ROMA) goals and applicable outcome indicators as defined in the WV Outcome Framework. 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.

The State is partnering with the WV Community Action Partnership to lead a new state 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 NCRT candidates working to become trainers. Currently, 11 of 16 CEEs are represented on the Task Force. The State office has 2 NCRTs and the Association has 2 NCRTs that are also on the Task Force.

13.2. The State of WV will utilize the CSBG National Performance Indicators to track eligible entity performance in promoting self-sufficiency, family stability, community revitalization, and agency capacity as required under Section 676(b)(12) of the CSBG Act. The CEE shall report all agency-wide unduplicated customer and household characteristics, demographics and outcome/indicator data in DBA FACS Pro™. Data quality assurance measures and goals will be added to the State monitoring and performance review of all CEEs receiving CSBG funding.

The CEE shall provide on a quarterly basis, timely, complete and accurate CSBG Information Survey (hereafter "IS") data via DBA FACS Pro™. Data to be provided specifically is unduplicated customer and household characteristics and demographics as indicated in Section G of the IS; customer outcome/indicator projected and actual data.

The CEE shall report unduplicated household characteristics and demographics, outcomes and indicators for all programs and services, not only those supported by CSBG. (ROMA Goals 1 and 6)

13.3. 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 also 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 related to the ROMA system.

13.4. Eligible Entity Use of Data: 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 into the system. The State also recognizes that additional oversight and work needs to be done to ensure that this process takes place on a local and state level, and is working to make significant improvements to this system through the implementation of ROMA Next Generation and the new annual reporting requirements for CSBG.

Community Action Plans and Needs Assessments

13.5. 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 can 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 this program and the amount.
 - B. CSBG funding: Includes the amount of 2015 CSBG funds allocated to this program. If carryover is being allocated to this program, it must be indicated.
 - 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 or not a formal agreement exists.

Each Individual/Family level program also requires the completion of a ROMA Logic Model.

13.6. State Assurance: 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 on-site monitoring of the CEE.

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

14.1 Use of Funds Supporting Local Activities

CSBG Services

14.1a. 676(b)(1)(A): The State reviews eligible entities' annual grant applications to assure that support activities are designed to meet the requirements outlined in section 676(b)(1)(A) of the CSBG Act. As part of the Grant Agreement between the State and CSBG eligible entity, "funds made available through grant or allotment will be used –

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

Needs of Youth

14.1b. 676(b)(1)(B) The State reviews eligible entities' annual grant applications to assure that support activities are designed to meet the requirements outlined in section 676(b)(1)(B) of the CSBG Act. As part of the Grant Agreement between the State and CSBG eligible entity, "funds made available through grant or allotment will be used –

- (B) to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and

collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as--

- (i) programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and
- (ii) after-school child care programs;

Coordination of Other Programs

14.1c. 676(b)(1)(C) The State reviews eligible entities' annual grant applications to assure that support activities are designed to meet the requirements outlined in section 676(b)(1)(C) of the CSBG Act. As part of the Grant Agreement between the State and CSBG eligible entity, '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)

State Use of Discretionary Funds

14.2 676(b)(2) See items 7.9 and 7.10 for a description of 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.”

Eligible Entity Service Delivery, Coordination, and Innovation

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

Eligible Entity Service Delivery System

14.3a. 676(b)(3)(A) Each eligible entity in West Virginia provides a unique “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;” and describes that system 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) See item 9.3b for a description of “how linkages will be developed to fill identified gaps in the services, through the provision of information, referrals, case management, and follow up consultations.”

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

14.3c. 676(b)(3)(C) See item 9.7 for a description of how “funds made available through grants made under 675C(a) will be coordinated with other public and private resources.”

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

- 14.3d. 676(b)(3)(D)** 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, 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).

Eligible Entity Emergency Food and Nutrition Services

- 14.4. 676(b)(4)** 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."

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

- 14.5. 676(b)(5)** As described in items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b, the State provides "an assurance 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."

State Coordination/Linkages and Low-income Home Energy Assistance

- 14.6. 676(b)(6)** As described in items 9.2 and 9.5, the State provides "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."

Federal Investigations

- 14.7. 676(b)(7)** As described in item 10.13, the State assures that "the State will permit and cooperate with Federal investigations undertaken in accordance with section 678D."

Funding Reduction or Termination

- 14.8. 676(b)(8)** As described in item 10.7, the State provides "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).”

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

14.9. 676(b)(9) As described in item 9.6, 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.”

Eligible Entity Tripartite Board Representation

14.10. 676(b)(10) As described in item 11.3, “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.”

Eligible Entity Community Action Plans and Community Needs Assessments

14.11. 676(b)(11) As described in items 13.5 and 13.6, the State provides “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.”

State and Eligible Entity Performance Measurement: ROMA or Alternate system

14.12. 676(b)(12) As described in items 13.1, 13.2, 13.3 and 13.4, the State provides “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.”

Validation for CSBG Eligible Entity Programmatic Narrative Sections

14.13. 676(b)(13) 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 to assure that there is “information describing how the State will carry out the assurances described in this section.”

By signing here, the State CSBG authorized official is certifying the assurances set out above.

Jennifer Ferrell, Director
West Virginia Development Office - CAD

Date

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SECTION 15 Federal Certifications

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.

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

- (3) 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.
- (4) 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.
- (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 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.
- (6) 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.
- (7) 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.
- (8) 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.
- (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 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.

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.

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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.

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