

# STATE OF ALABAMA



**Policies and Procedures Manual  
Community Services Block Grant**

**Alabama Department of Economic and Community Affairs**

**July 2012**

# Table of Contents

**Section I Program Scope** **Page 1**

- A. ADECA Roles and Responsibilities
- B. Revision of Rules and Procedures
- C. Programmatic Assurances
- D. Legislative Provisions and Requirements

**Section II State Plan and Appropriation of Funds** **Page 3**

- A. State Plan
- B. Annual Allocation

**Section III Policies of Governing Boards** **Page 4**

- A. Legislative Mandate
- B. Board Composition
- C. Residence Requirements
- D. Conflict of Interest
- E. Limitations on Board Service
- F. Governing Power Board of Directors
- G. Bylaws Requirements
  - 1. Composition of the Board
  - 2. Selection Procedures
    - a. Public Officials
    - b. Low-Income
    - c. Private Sector
  - 3. Petition for Adequate Representation on the Board
  - 4. Removal of a Board Member
  - 5. Alternates
  - 6. Vacancies
  - 7. Quorum
  - 8. Schedule, Notice of Meetings and Documentation
  - 9. Minutes
  - 10. Committees on the Board
  - 11. Compensation
  - 12. Officials of the Board
  - 13. Evaluation of Executive Director

**Section IV Community Services Program Implementation** Page 10

**Program Overview**

- A. Service Delivery System
- B. Linkages
- C. Coordination with Other Public and Private Resources
- D. Innovative Community and Faith-Based Initiatives
- E. Community Needs Assessment

**Section V Community Action Plan and Procedures** Page 13

**Preface**

**Requirements**

- A. Administrative Documents
- B. Implementation Documents
- C. Programmatic Documents
- D. Fiscal Documents
- E. Certification Documents

**Section VI CSBG Grant Operation** Page 14

- A. CSBG Allowable Activities/Costs
- B. Policies and Procedures
- C. Customer Service Records
- D. Income Verification
- E. Residency Verification
- F. Appeal Procedure

**Section VII Subgrantee Requirements** Page 17

- A. Agency Personnel Policies and Procedures
- B. The Federal Hatch Act
- C. Code of Conduct
- D. Non-Discrimination
- E. Beason-Hammon Alabama Taxpayer and Citizen Protection Act

## **Section VIII Financial Policies and Procedures**

**Page 22**

- A. Financial Guidelines**
- B. Fidelity Bonds**
- C. Financial Management**
- D. Audits**
- E. Procurement Procedures**
  - 1. OMB Circular A-110**
  - 2. State Bid Laws**
- F. Expenditure Reports**
- G. Budget Modifications**
- H. Purchase or Permanent Improvements of Real Property**
- I. Purchasing Guidelines**
- J. Property Management**
- K. Retention of Records**
- L. Indirect Costs**
- M. Contracts**
- N. Termination of the Agreement, Reduction, or Suspension of Funding**

## **Section IX Reporting Requirements**

**Page 31**

- A. ROMA/IS Report**
- B. Board and Committee Reporting**

## **Section X FACS Pro**

**Page 31**

**FACS Pro Manual**

## **Section XI Agency Audit Reports**

**Page 46**

**ADECA Audit Policy**

## **Section XII Monitoring**

**Page 70**

- A. Desk and Field Reviews**
- B. Corrective Action Plan**

## **Section XIII Grievance Policy**

**Page 72**

- A. Policy**
- B. Procedure**

## **Appendices**

**Page 74**

- A. Useful Links**
- B. Community Action Plan**

## Section I- Program Scope

### A. Roles and Responsibilities

The Alabama Department of Economic and Community Affairs (ADECA) was designated by the Governor to administer and distribute Community Services Block Grant (CSBG) funds. Additionally, the Legislature, through a line item appropriation, distributes the State General Fund monies for community action agencies as well. Consequently, ADECA's first role is to distribute funds, both federal and state, to the community action agencies.

In both instances, the funds are to be distributed in a timely manner. When possible, the funds are to be distributed as an advance payment. In those instances where an agency has shown to be unable to meet the requirements of OMB Circular A-110, then funds may be disbursed on a reimbursement basis. An agency may also be placed on a reimbursement basis because of serious programmatic findings.

ADECA, in its second role, is responsible for performance based reporting of both federal and state monies. This entails the collection of data from each agency, then compiling the data and submitting reports to the state and/or federal agencies that are responsible for the funds. In the case of CSBG funds, the performance based element is referred to as ROMA – Results Oriented Management and Accountability.

A third role, or responsibility that ADECA has, is that of providing training and technical assistance to the community action agencies' staff members, executive directors and board members. Training and technical assistance covers a wide range of subjects including, but not limited to, workshops on FACSPRO, the OMB circulars, and Board Governance. Technical assistance is provided both as a response to requests and as a result of monitoring reviews that indicate weaknesses. ADECA strongly encourages all community action agencies across the state to request technical assistance if they ever encounter any issues or situations in which they feel guidance is needed to resolve them accordingly. ADECA's primary goal, surmounted only by the programmatic assurances set forth in the act, is to ensure all sub-grantees are administering CSBG funds and programs in accordance with the law.

The fourth role of ADECA is determining if funds are used in accordance with applicable federal and state laws, rules, regulations, or policies. The determination is made through monitoring reviews as well as audit reports. In those instances where it is determined that the use of funds was not in compliance with applicable laws, rules, regulations, or policies, then corrective actions must be determined. If the determination includes disallowed costs that must be repaid, then the Community action agency will be required to remit those funds to the State. The State will in turn remit the funds to the funding source.

The fifth role of ADECA, with respect to community action agencies, is that of partner. ADECA works in partnership with not only the agencies but also with the funding sources, other state agencies, and the Community Action Agencies Association of Alabama (CAAA). The partnerships

should serve as a means to provide the widest range possible of services to the low-income in the most cost effective and efficient manner. ADECA will work directly with each agency and its board pertaining to contractual matters or the affairs of that particular agency.

#### **B. Revision of Rules and Procedures**

Periodically, it will be necessary to change or revise procedures and requirements in response to new Federal or State regulations, or to changing circumstances among the low-income population or of resources available to low-income citizens. Therefore, ADECA will review the procedures contained herein this manual on a regular basis and issue any changes in the form of ADECA Policy Letters.

An ADECA Policy Letter is an official means of communication in which pertinent policy and procedure changes are disseminated to each of the Community Action Agencies throughout the State. ADECA will ensure all agencies receive notice of policy/procedure changes via Policy Letters and will make the appropriate revisions to the CSBG Policies and Procedures manual as needed.

#### **C. Programmatic Assurances**

“The purposes of the Community Services Block Grant Program is—

“(1) to provide assistance to States and local communities, working through a network of community action agencies and other neighborhood-based organizations, for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient (particularly families who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.)); and

“(2) to accomplish the goals described in paragraph (1) through—

“(A) the strengthening of community capabilities for planning and coordinating the use of a broad range of Federal, State, local, and other assistance (including private resources) related to the elimination of poverty, so that this assistance can be used in a manner responsive to local needs and conditions;

“(B) the organization of a range of services related to the needs of low-income families and individuals, so that these services may have a measurable and potentially major impact on the causes of poverty in the community and may help the families and individuals to achieve self-sufficiency;

“(C) the greater use of innovative and effective community-based approaches to attacking the causes and effects of poverty and of community breakdown;

“(D) the maximum participation of residents of the low-income communities and members of the groups served by programs assisted through the block grants made under this subtitle to empower such residents and members to respond to the unique

problems and needs within their communities; and PUBLIC LAW 105–285—OCT. 27, 1998 112 STAT. 2729

“(E) the broadening of the resource base of programs directed to the elimination of poverty so as to secure a more active role in the provision of services for—

“(i) private, religious, charitable, and neighborhood-based organizations; and

“(ii) individual citizens, and business, labor, and professional groups who are able to influence the quantity and quality of opportunities and services for the poor.

#### **D. Legislative Provisions and Requirements**

The State of Alabama is required to make available to eligible entities and certain other agencies as defined in Section 11-96-4 throughout the state, no less than 95 percent of the funds received through the Community Services Block Grant to accomplish the goals set forth in the programmatic assurances. No more than 5 percent may be utilized for administrative costs.

**95% for Eligible Entities + 5% Administrative = 100%**

**95% Eligible Entity-** Funds appropriated for the purpose of Section 11-96-1 shall be allocated annually to community action agencies in proportion to the size of the poverty level population served by the agency when compared to the size of the poverty level population and available resources in the state. “Poverty level population” means the number of people whose household income is below the official poverty line established by the United States Director of the Office of Management and Budget.

**5% Administrative-** U.S.C. Section 675C (b)(2) states, “No State may spend more than the greater of \$55,000 , or 5 percent, of the grant received under section 675A or State allotment received under Section 675B for administrative expenses, including monitoring activities. Funds to be spent for such expenses shall be taken from the portion of the grant under section 675A or State allotment that remains after the State makes grants to eligible entities under subsection (a)”.

## **Section II- State Plan and Appropriation of Funds**

### **A. State Plan**

ADECA must develop an application and State plan to submit to the Department of Health and Human Services covering a period of no less than one fiscal year and no more than two fiscal years. This plan must be submitted no later than thirty days prior to the beginning of the fiscal year covered by this plan.

ADECA is required to hold at least one public hearing in the state giving sufficient time and notice of the hearing to provide the public the opportunity to comment on the proposed use

and distribution of funds prior to the submission of the State plan to the Department of Health and Human Services.

In order to be eligible to receive CSBG funding, the State shall conduct one legislative hearing every three years in conjunction with the development of the State plan.

### **B. Annual Allocation**

Funds appropriated for the purpose of Section 11-96-1 shall be allocated annually to community action agencies in proportion to the size of the poverty level population served by the agency when compared to the size of the poverty level population and available resources in the state. "Poverty level population" means the number of people whose household income is below the official poverty line established by the United States Director of the Office of Management and Budget (OMB).

The Sub-grantee may operate its program on an advance or reimbursement basis. If the Sub-grantee elects to operate on an advance basis, it may request an advance of funds for the first forty-five (45) days of operation under the grant agreement (on or after the initial day of the contract start date). ADECA may, subject to the availability of funds from the Department of Health and Human Services, advance to the Sub-grantee funds sufficient to finance the program for up to forty-five (45) days. However, the Sub-grantee operating on an advance basis agrees to report its expenditures every thirty (30) days. Subject to the initial advance of funds, subsequent advances may be made to the Sub-grantee based on prior expenditures and/or estimated future expenses covering a period not to exceed forty-five (45) day increments.

Contracts will be originally written for fifteen (15) months. The duration of an agreement may be extended an additional three (3) months if necessary but the Sub-grantee must receive prior approval from the Community and Economic Development Division before any extensions are granted. **Under no circumstances will a contract be extended beyond eighteen (18) months.**

## **Section III- Policies of Governing Boards**

### **A. Legislative Mandate**

CSBG Act (42 U.S.C. 9901 et seq.) as amended, requires the State to provide assurance that each Community Action Agency or non-profit organization administering the Community Services Block Grant Program have a tripartite board which will be constituted as follows:

- (A) One-third of the members of the board are elected public officials, currently holding office, or their representatives, except if the number of elected officials reasonably available and willing to serve is less than one-third of the membership of the board,

membership on the board of appointed public officials may be counted in meeting such one-third requirement;

- (B) At least one-third of the members are persons chosen in accordance with democratic selection procedures adequate to assure that they are representative of the low-income in the area served; and
- (C) The remainder of the members is officials or members of business, industry, labor, religious, welfare, education, or other major groups and interests in the community. Strict adherence to these requirements is necessary to be eligible for receipt of Community Services Block Grant funding and for continued designation as an eligible entity.

The bylaws of the organization must set forth the process and procedures for compliance with the Federal and State statutory mandates for the composition of the board of directors. A copy of the bylaws must be on file with the Alabama Department of Economic and Community Affairs, Community and Economic Development Division. The agencies are required to comply with the process and procedures set forth in its bylaws.

These guidelines are provided to assist the agency in developing the process and procedures for compliance with boards of directors.

#### **B. Board Composition**

A "Community Action Agency" board of directors shall have not less than 15 members and not more than 51 members (Code of Alabama §11-96-3). A "Limited Purpose Agency" administering the CSBG Programs shall have not less than 15 members and not more than 51 members (Code of Alabama § 11-96-4). The board composition shall be as follows:

- a) Elected public officials currently holding office, or their properly designated representatives, must comprise one-third of the board. Appointed public officials may be counted in meeting this one-third requirement only if the number of elected officials reasonably available and willing to serve is less than one-third of the membership of the board. These members shall be designated or approved by the chief elected local government official or officials of the jurisdiction which they represent;
- b) The persons chosen to represent the low-income must comprise at least one-third of the board; and
- c) Representatives of business, industry, labor, religious, welfare or other private groups and interests shall comprise the remainder of the board.

**Where the administering agency serves more than one county, the composition of the board shall include representatives of all counties served.**

### **C. Residence Requirements**

Each member of the board selected to represent a specific geographic area within the community must reside in the area which he/she represents.

### **D. Conflict of Interest**

A person who serves on the board as an officer or an employee of an organization that wants to perform a component of the work program funded by the Community Services Block Grant must publicly disclose the intent to bid for the component as well as recuse themselves from all discussion and any selection determinations regarding award of the component. Generally, public officials serving on the agency's boards will not be in conflict if the agency should contract with his/her jurisdiction to perform a component to the work program funded by CSBG. In most cases, a person may not serve on the board if an immediate family member is employed by the agency. An immediate family member is defined as mother, father, brother, sister, brother-in-law, sister-in-law, or spouse.

### **E. Limitations on Board Service**

Public officials serve at the pleasure of the designating officials as long as the public official is currently holding office. Representatives of the low-income and of the private sector may serve as required by the corporation bylaws. "In the absence of a provision fixing the term of office, the term of office of a director shall be one year." (Code of Alabama §10A-3-2.09 (b)).

### **F. Governing Power of the Board of Directors**

The board members or governing board acting as one has the legal powers and responsibilities granted under its state charter as the board of directors of a private, not-for-profit corporation. For example, the board must have the power to enter into legally binding agreements with any Federal, State or local agency or with any private funding organization for the purpose of operating programs or providing services to low-income recipients.

### **G. Bylaws Requirements**

The Bylaws must address at least the following:

1. **Composition of the Board:** The bylaws shall set the number of seats on the board and the allotment of seats to public officials, representatives of the low-income and representatives of the private sector.

2. **Selection Procedures:** The bylaws shall include procedures for selecting all sectors of the board.
- a. **Public Officials-** The chief elected official of the local government shall select the elected public officials to serve on the board. In the event the elected public officials are unavailable or unwilling to serve on the board, the designating officials may select appointed public officials to serve on the board. The bylaws of the board may authorize each public official serving on such board to appoint a representative who will then serve as the Board member. These representatives need not be public officials themselves, but they shall have full authority to act on behalf of the public officials whom they represent at meetings of the board regarding the business of the board.
  - b. **Low-Income-** Representatives of the low-income shall be selected/elected in accordance with democratic selection procedures adequate to assure representation of low-income persons residing in the area served. Representatives of the low-income may be democratically selected either to represent a specific area or community served by the agency, or at large to represent the entire area served by the agency. The following democratic selection procedures may be used, either separately or in combination:
    - i. Nominations and elections, either within the community, specific areas or the entire area served by the agency;
    - ii. Election at a meeting or conference of low-income persons where date, time and place have been adequately publicized;
    - iii. Selection/election of representatives of a community-wide board by members of a neighborhood organization who are themselves selected by a low-income neighborhood of area residents;
    - iv. Democratic selection of representatives by existing organizations designated by the board whose membership is predominantly composed of low-income persons or their representatives.

This is not meant to limit the variety of selection procedures which may be used. Any democratic selection procedure which assures adequate representation of the low-income where date, time and place have been adequately publicized in advance of the selection is acceptable. The agency will have these procedures documented in their bylaws. The defined boundaries for the democratic selection of representatives of the low-income will be maintained in documented form in the agencies files for review. Agencies should maintain documentation of the selection/election process.

- c. **Private Sector-** Private sector members shall be selected in such a manner as to assure that the board will benefit from broad community involvement. Such representation shall come from members of business, social service agencies, industry, labor, religious and educational institutions or other major groups or

constituencies of the low-income concerned with specific problems of the community. Once an organization is selected, it shall nominate its own representative on the board in accordance with the bylaws. Each representative shall be empowered to speak and act on behalf of the organization which he/she represents regarding the business of the board.

3. **Petition by Other Groups for Adequate Representation on the Board:** The agencies shall establish and include in their bylaws procedures allowing community agencies and representative groups of the low-income which feel themselves inadequately represented on the board to petition for adequate representation. The bylaws shall specify in these procedures the channel of communication to be used, the number of signatures required for a valid petition and the action required of the board in response to a petition for more adequate representation. The board bylaws shall include provisions for adjusting its composition in cases where a petition is granted, in order to maintain the proper percentage of public officials and of representatives of the low income.
4. **Removal of a Board Member:** The bylaws shall include a description of the grounds for removal of a board member and the procedures to be followed.
5. **Alternates:** The Alabama Nonprofit Corporation does not address the use of alternates to represent board members in their absence, therefore alternates are prohibited.
6. **Vacancies:** A vacancy on the board exists when; (1) a member has been notified of his/her official removal by action of the board for cause; (2) when a member notifies the board of his/her resignation; (3) when a member dies; or (4) when a public official leaves office. When the seat of a public official is vacant, the board shall ask the designating officials to select another public official to fill the seat. When the seat of a representative of a private sector is vacant, the board shall ask that organization to name another representative to finish out the term. When the seat of a representative of the low-income is vacant, the board may include in its bylaws either of two options: (1) it may repeat the democratic selection procedures; or (2) it may allow the remaining representatives of the low-income to select a person to finish out the term, with the condition that the person selected represents the same constituency as the original representative. **The board should fill all vacancies in a timely manner but all vacancies must be filled within 120 days.**
7. **Quorum:** A quorum for a meeting of the board shall be over fifty (50) percent of the board total as established in the agency's bylaws.

8. **Schedule and Notice of Meeting:**

1. The board shall have not less than four (4) regular meetings per program year with a quorum. The annual meeting may count as one of these meetings. The schedule shall be defined in the agency's bylaws.
2. The board shall provide notice of the agenda in writing to all of its members for any meeting as specified in its bylaws.
3. All board of directors meetings shall be posted on the Secretary of State website and in places in the community frequented by the public to ensure the public is informed of the time and date of each meeting in accordance with the Alabama Open Meetings Act. In accordance with Section 3 (6) c. of the Act, the "Posted notice pursuant to this section shall include the time, date and place of meeting. If a preliminary agenda is not available, the posted notice shall include a general description of the nature and purpose of the meeting." Agencies should identify in the posted notices whether the meeting to be conducted is a full board or committee meeting.

9. **Minutes:** The agency shall maintain a roster of attendance and written minutes for Board and Committee meetings including a record of votes on all motions. The members making and seconding motions must be identified in the minutes. If motions are not unanimous, there must be a record of each member's vote. A record of attendance or sign-in sheet must be maintained along with the minutes (Alabama CSBG Community Action Agencies Policy Letter Number 2, Revision 3). A signed copy of the minutes, roster of attendance, and any written material distributed at the meeting must be posted in the FACS Pro system within 14 days after the next meeting has occurred and the minutes have been approved by the board.
10. **Committees on the Board:** The board may establish any committee it considers necessary for conducting its business. The composition of these committees shall fairly reflect the composition of the full board. Public notices and quorums for committee meetings are required to be the same as those for full board meetings. Notices are in accordance with The Alabama Open Meetings Act and a quorum is over fifty (50) percent of the established membership of the committee.
11. **Compensation:** Regular compensation to members for their services on the board is not permitted. However, allowances for the low-income and reimbursement to all members of the board for expenses to attend the meetings are permitted, e.g., mileage. Low-income representatives may also be reimbursed for child care expenses.
12. **Officials of the Board:** Define the responsibilities of the officers of the board, e.g., the chairperson, vice chairperson, secretary, and treasurer.

13. **Evaluation of Executive Director:** Define the responsibility and authority of the board in regard to the hiring and firing of the Executive Director, and the responsibility of the performance of the Executive Director. All timesheets and travel requests for the Executive Director must be approved and signed by the Board Chair or his/her designee.

## **Section IV- State Community Services Program Implementation**

### **Program Overview**

- A. **The Service Delivery System-** The provision of CSBG services to individual low-income persons statewide is carried out primarily through Alabama's eligible entities (community action agencies). In accordance with Alabama Code § 11-96-1 through 11-96-6 (1994), ADECA will provide 95 percent of its CSBG allocation to these twenty-one (21) community action agencies for the provision of services in each applicable CSBG assurance area. These agencies provide services to low-income people in each of the state's sixty-seven (67) counties. Each community action agency at a minimum, provides information and referral related services to customers needing assistance. ADECA will assist in identifying and developing resources and provide technical assistance to the agencies.
- B. **Linkages-** A programmatic element of the work plans submitted by the community action agencies will include the development of linkages and cooperative agreements locally.
- C. **Coordination with Other Public and Private Resources-** Other public and private resources of funding are submitted with estimated amounts leveraged as part of each community action agency's plan. The State requires each local entity to submit coordination plans for their grant activity. The coordination plan describes how local entities have conferred with area service providers and established working relationships, how linkages have been developed to fill identified gaps in services, how funding will be coordinated with other public and private resources, and how all the above will result in a multi-program impact on the client's progress towards self-sufficiency. As the State becomes aware of available grants, the information will be disseminated to the community action agency.
- D. **Innovative Community and Neighborhood-based Initiatives-** Local entities use these funds to support innovative community and neighborhood based initiatives related to the purpose of the CSBG, including fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting.

## **E. Community Needs Assessment**

Each Sub-grantee is required to submit a comprehensive community needs assessment for the community served every three (3) years as a condition of funding. The community needs assessment may be coordinated utilizing assessments conducted for other programs; however, a single funding source needs assessment may not be substituted for the required three (3) year CSBG Community Needs Assessment. Each agency is responsible for conducting or securing its own needs assessment. The needs assessment of each agency describes how the assessment was conducted and provides aggregate results. The goals and objectives of each agency are based upon the findings of the assessment. The State realizes that agencies require flexibility in conducting local needs assessment, as each area varies in the resources available and the services provided. **By the start of FY 2014 all agencies should have a current CSBG Comprehensive Community Needs Assessment.**

The CSBG Act (Section 676(b) (11)) requires an “assurance from the State that each Community Action Agency must conduct a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs...”

The assessments must be updated at least annually or when major changes occur within that agency’s geographic service area (i.e., loss of major employer, natural disaster, etc.)

A Community Needs Assessment is an instrument utilized by the agency to gather information and data about a service area’s opinions, needs, challenges and available resources to assist the agency develop a plan to strategically address the needs identified at the conclusion of the assessment.

The Community Action Agency should begin by designating a staff member or members to an assessment committee. This employee/committee should possess knowledge of all the social service providers, community-based organizations, government agencies, and other pertinent organizations within their service area that are willing to collaborate and share information with the agency about present and emerging needs facing the area. The following are some beneficial community needs assessment tools:

- Interviews- Collect information from community members who are in a position to be very familiar with community needs. These people might be community leaders, professionals, clients, or other individuals who have affiliations with particular organizations or agencies.
- Public Forum- Bring a wide range of community members together at public meetings to gather information via group discussions.
- Focus Group- Obtain opinions and ideas from a small, targeted group of community members

- Survey- Use a formal survey or questionnaire to collect data from community members and clients
- Secondary data analysis- Review and analyze data that has already been collected from social service and partner agencies regarding community issues and needs.
- Asset mapping- Gather information about existing community assets and resources.

Some factors that might influence the type of assessment your agency selects include time, cost, target audience, and agency capacity. Ideally a community needs assessment should consist of a combination of data collection methods. The assessment should include:

- A community needs assessment team
- Purpose of the assessment (goals and objectives, parties involved, data collection dates, etc.)
- Select and/or develop community needs assessment tools and methodologies (focus groups, key informants, surveys, forums, etc.)
- Develop a plan for the assessment (who, what, when, where, how)
- Implement the assessment using the selected tools
- Analyze the results
- An executive summary including key findings and priorities
- Utilize report to determine agency response

There is a community action guide for conducting comprehensive community needs assessments available at [www.NASCSP.org](http://www.NASCSP.org)

The type of information gathered will depend on the agency's service area and its specific needs. However, the following information should be gathered in all community needs assessments:

- Description of the agency's service area and a statistical profile (charts, graphs, maps, etc.)
- Needs identified by community leaders and members
- Community Perspectives (Reoccurring themes, key quotes,...)
- Current action being taken to meet community needs
- Local resources available to help meet community needs and their scope of services
- Opportunities for projects
- Challenges to projects (gaps in services, duplication, etc.)
- Involvement of the community in the project
- Long-term sustainability of the project by the community

The information and data collected during the Community Needs Assessment should be analyzed and compiled into a report and presented to the agency's board. These findings need to be refined and translated into key findings and emerging trends affecting the service area prior to submitting the assessment to the board. Based upon the needs identified during the assessment, agencies can select areas within their service area which may require additional

services or issues that have emerged since the last assessment which will need to be prioritized by the agency.

## **Section V- Community Action Plan (CAP) and Procedures**

### **Preface**

In order to receive funding for an upcoming fiscal year, eligible entities will be required to submit a Community Action Plan to ADECA's Community and Economic Development Division on an annual basis. The Community and Economic Development Division has developed a supplemental Community Action Plan (CAP) manual which thoroughly demonstrates what each Community Action Agency will be required to submit each year in order to be eligible to receive CSBG funding. This section merely serves as a reference for agency compliance with State application requirements.

### **Requirements**

#### **A. Administrative Documents**

1. Completed Checklist
2. Community Action Agency Identification
3. Site Locations
4. Agency Organization Chart
5. Community Action Agency Board Roster from FACS Pro
6. Board of Directors Meeting Schedule
7. Agency Closing Days

#### **B. Implementation Documents**

1. Community Needs Assessment Form
2. Service Delivery System
3. Linkages
4. Coordination & Collaboration
5. Community Based Initiatives
6. Coordination with Employment & Training Activities
7. Provision For Emergency Services
8. Youth Activities Services
9. Senior Activities Services

#### **C. Programmatic Documents**

1. Planned Expenditure Summary
2. Program Summary Report (printed from FACS Pro)
3. Summary of Program Activities (9 Service Categories)
4. Activities Explanation

**D. Fiscal Documents**

1. Agency's Approved Indirect Cost Rate and/or Cost Allocation Plan
2. Current Fidelity Bond
3. CSBG Budget (Administrative/Programmatic)
4. Copy of most recent form 990

**E. Certification Documents**

1. Lobbying
2. Refunding
3. Programmatic Assurances
4. Debarment, Suspension, and Other Responsibility Matters
5. Drug Free Workplace
6. Tobacco Smoke

## **Section VI- CSBG Grant Operation**

**A. CSBG Allowable Activities/Costs**

**CSBG Allowable Activities/Costs**

Community Services Block Grant (CSBG) allowable costs are those that support services and activities which are targeted to the low-income population to alleviate poverty and to promote self-sufficiency for those individuals and families.

For CSBG program reporting requirements, the HHS Office of Community Services (OCS) defines "direct" program and "administrative" costs in accordance with three criteria; (i) meeting Congressional intent for the program; (ii) achieving consistency with HHS audit and financial management standards; and (iii) ensuring a common basis for relating expenditures to the CSBG Results Oriented Management and Accountability System (ROMA).

Any CSBG funded program/activity should be identified in the Community Needs Assessment.

**Administrative Costs**

Administrative costs include administering and managing central staff and centralized functions of the agency and prorated costs associated with the agency's audit. Administrative cost also includes expenditures for support for members of the agency's governing body.

Administrative costs do not include costs for administration, management or overhead expenses directly linked to a specific project operated by the CAA. Such administrative costs should be included as part of the program. For example, administrative overhead and general

support for a CAA Community Center (such as space, supplies, program manager, etc.) should be reported under Programmatic Costs.

**CSBG Administrative costs are limited to 20% of the CAA's total CSBG budgeted amount.**

### **Programmatic Costs**

Programmatic costs include services and activities geared toward: attaining an adequate education, securing meaningful employment, acquiring adequate housing and living environments, obtaining emergency assistance, participating in community affairs, addressing the needs of youth and removing obstacles to improved self-sufficiency.

Allowable costs also include activities related to the CSBG program purpose such as coordinating, strengthening and expanding local services and programs related to self-sufficiency and the reduction of poverty. These include but are not limited to:

- Direct Client services which have a tangible benefit
- Support for creation of new programs and services
- Agency capacity-building and quality improvement activities related to the mission of CSBG, including strategic planning, community needs assessments and the coordination and strengthening of community based programs
- Salaries and fringe benefits of program staff and managers
- Travel expenses
- Equipment and supplies
- Facilities expense

**At least 50% of CSBG funds must be used for Direct Client services.**

**CSBG funded services may be provided to households with incomes up to 125% of the poverty income guidelines. OMB poverty income guidelines apply to CSBG funded services and to services provided by CSBG funded staff. However, if CSBG funded staff provide services funded by other sources with income guidelines that differ from the CSBG guidelines, the other funding sources' guidelines shall apply for those services.**

**Household Income eligibility documentation must be maintained on all clients served either directly or served by staff who are paid with CSBG funds.**

### **B. Policies and Procedures**

All agencies shall be required to develop and implement written standards of operation to include program policies and procedures to govern the programs administered utilizing CSBG funds. The policies and procedures must address the following:

1. Intake procedures which shall include instructions for using agency intake and application forms.

2. Eligibility criteria
3. Procedures for recertification of eligibility
4. The definition of household in accordance with current Federal guidelines.
5. Safety mechanisms to ensure staff and staff member's family members do not gain an unfair advantage over other potential clients.
6. Process to identify and inform custodial parents who receive or are enrolled in CSBG programs about child support offices at the State and local level.
7. Protocol for prioritizing applicants in instances of programs or services administered by the agency exceeding capacity.
8. Verbiage which ensures no person shall be excluded from or denied benefits based on their race, color, national origin, or gender.
9. An appeal procedure outlining an appeal process which encompasses all applicants who apply for CSBG services. The procedure shall ensure the applicant is notified of their right to appeal prior to their eligibility determination. The applicant reserves the right to appeal any eligibility determination in which they feel the decision rendered was unduly influenced by discriminatory factors.

All of the aforementioned criterion must be in place by start of FY 2013 contract.

#### **C. Customer Service Records**

Records must be maintained for all clients who undergo the intake process at each Community Action Agency. These records will be comprised of two sources: (1) digital FACS Pro records in addition to (2) physical records which will be maintained on-site in a secure location to prevent any potential breeches of customer confidentiality. The physical records shall contain documentation such as the client's and/or client's household members picture identification, income verification, physical address documentation, Social Security Number, etc., in addition to any pertinent documentation required to determine eligibility for CSBG services.

#### **D. Income Verification**

Verification of income is required for all households served with CSBG funds. This includes both direct assistance and non-direct assistance.

Verification of income may consist of, but is not limited to:

1. Payroll, check stub, or check;
2. Records kept by self employed;
3. Written statement of employer;
4. Documentation from the Department of Human Resources, Department of Industrial Relations, or other State agencies provided the information is complete and current.

**Self-declaration and/or statements from references are not acceptable means of income verification.**

Income verification will be required each time a client and/or household requests assistance from a community action agency. ADECA requires each agency to verify and maintain in their records documentation capable of validating one (1) months income for each potential client/household.

**E. Residency Verification**

Verification of residence is required for all households served with CSBG funds.

Verification of residence may consist of:

1. Any document showing the recent address of the applicant, such as a driver's license, utility bill, tax receipt, or rent receipt;
2. Other sources of verification which clearly demonstrate that the applicant is a resident of the county in which she/he is making an application.

**F. Appeal Procedure**

Each agency shall develop and implement an appeal procedure which outlines the method applicants should follow if they should decide to appeal any decision made in regard to their eligibility determination and/or addressing claims of discrimination. The appeal procedure shall either be disseminated to each applicant prior to application or be posted in a conspicuous area within the agency in plain view of all potential applicants.

## **Section VII- SubGrantee Requirements**

**A. Agency Personnel Policies and Procedures**

Each community action agency shall have a comprehensive personnel policy for their agency in place at all times. The agency will be solely responsible for the development of their own personnel policy. Each agency's policy will be required to address the following tenets necessitated by Executive Order 11246:

1. Job Descriptions
2. Job Postings and Advertisements
3. Records of Job Offers
4. Applications and Resumes
5. Interview Notes
6. Tests and test results (If applicable)
7. Written Employment Policies and Procedures

## 8. Personnel Files

All Federal sub-grantees are required to post an Equal Employment Opportunity (EEO) notice in a conspicuous area on the premises where it is visible to all employees.

In addition to the aforementioned Federal requirements, all agencies are expected to adhere to the existing personnel policies and procedures mandated by ADECA which are as follows:

1. Organizational Chart
2. Agency rules governing vacations, sick leave, annual salary increases (if applicable), and other conditions of employment
3. Description of any benefit plans employees are eligible to receive. Must address agency and employee contributions and/or other requirements.
4. I-9 Documentation for employees hired after 1988
5. A whistle-blower policy reflective of the Sarbanes-Oxley Act.
6. Availability of Agency's Policies and Procedures manual to all employees in addition to Board Members
7. Time and attendance policies/Signatory employee responsible for time and attendance
8. Grievance Procedures addressing non-discrimination assurances for staff members (CFR 45 Part 2540.230)
9. A No Smoking Policy in accordance with Public Law 103-227 Part C
10. Delineation of employee wage scales
11. Travel policies to include approval requirements as well as allowances and reimbursement process (see subsequent section addressing Travel and Reimbursement Procedures)
12. Leave procedures
13. Personnel Policies and Procedures must be in accord with the fiscal policies promulgated in respect to time and attendance reports and travel policies

### **Policy Guide for Travel and Reimbursement**

The purpose of this policy is to revise guidelines for travel expenses reimbursed by the Alabama Department of Economic and Community Affairs (ADECA). These guidelines are not meant to change an agency's current travel policy. They set guidelines and limitations on amounts to be reimbursed from funds administered by ADECA CSS.

### **Guidelines**

The following are the guidelines for reimbursement revised by ADECA:

#### A. IN-STATE TRAVEL

- (1) The travel form used by the subgrantee must reflect beginning and ending destinations (city or town should be included) as well as times of departure and

return to base. The traveler's signature, as well as the person authorizing travel, must be on the form. When travel is for attending conferences or workshops, the agenda must be attached to the travel form.

- (2) Reimbursement for mileage expenses shall not exceed the State rate which is currently set at \$.555 per mile.
- (3) For travel involving less than 6 hours, no meal allowance or per diem is allowed.
- (4) For travel of 6 hours to 12 hours, there is an allowance of no more than \$11.25 for one meal, provided the travel destination is 25 miles or more from official base or station (traveler's business address, city or town, location). When meals are provided for the traveler, no allowance will be paid.
- (5) For travel requiring more than 12 hours to a destination 25 miles or more from official base or station, no more than \$30.00 allowance is allowed when the trip does not involve an overnight stay.
- (6) For travel requiring an overnight stay, the allowance may not exceed the current daily rate for each full day and portion of a day. Under no circumstances will expenses be reimbursed for overnight travel in the city of the traveler's base. Individual circumstances will determine what is reasonable, but generally a trip of 100 miles or less one-way does not require an overnight stay. Exceptions to the policy may be approved by ADECA program managers. The current travel allowance is set at \$75.00 per day. This includes hotels, meals, etc.

## B. OUT-OF-STATE TRAVEL

- (1) All out-of-state travel must have prior written approval of the ADECA program manager. This approval may be obtained via email, facsimile, or US mail.
- (2) The mileage rate for out-of-state travel is the same as in-state travel.
- (3) Travel form must list departure/return city, departure/return time, and be signed by traveler and supervisor. When travel is for attending conferences or workshops, the agenda must be attached to the travel form.
- (4) Receipts must be provided for hotel and travel (airfare, etc.) expenses. The receipt must reflect \$0.00 balance. **A credit card receipt is not considered a receipt.** Air travel should be booked for coach class. Receipts must be submitted with reimbursement requests. Baggage fee reimbursement is limited to one (1) bag each way.

- (5) The traveler may be reimbursed for actual expenses for meals when traveling out-of-state. Itemized receipts are required that indicate what was purchased, date, name, and location of the restaurant. **A credit card receipt is not considered a receipt.** Reimbursement for meals for a person other than the traveler will not be allowed. Meals are capped at the following: Breakfast - \$10.00, Lunch - \$15.00, Dinner - \$25.00. Itemized receipts must be attached to receive actual reimbursement of meals or the capped amount, whichever is less. If meals are provided at the event, you cannot claim a meal for that period of time. If there is a meal under \$10.00 and there is no receipt available, the traveler can write a statement of such, "the following are actual expenses incurred during travel" and then list the date, time, place, and amount of the receipt. In order to claim breakfast on your first day, you must leave before 6 a.m. and to claim dinner on the last day, your return time must be later than 6 p.m.
- (6) The amounts paid as tips for food service (cannot exceed 20%), the transfer of baggage, and similar personal services shall be included as items of expense by the traveler when the amounts of such expenditures do not exceed the customary charges for these services. The cost of tips paid for meals shall be included in the price of meals. The cost of tips paid for the transfer of baggage must be itemized as to amounts and dates paid. Receipts are required in substantiation of parking costs.

Any questions regarding the information above should be directed to the ADECA CSBG Program Manager.

## **B. The Federal Hatch Act**

The Omnibus Budget Reconciliation Act of 1981 specifically makes grantees subject to certain provisions of the Federal Hatch Act. CSBG funds may not be used in a manner involving the use of program funds, the provision of services, or the employment or assignment of personnel, in a manner supporting or resulting in the identification of such programs with-

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

## **C. Codes of Conduct**

Community Action Agencies must maintain written standards of conduct governing the performance of its board members and employees engaged in the award and administration of

contracts. No employee, officer, or agent shall participate in the selection, award, or administration of a contract supported by Federal funds if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee, officer or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award.

The officers, employees, and agents of the recipient shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to sub-agreements.

However, recipients may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct shall provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the recipient.

#### **D. Non-Discrimination**

The CSBG Sub-recipient shall be and is prohibited from discrimination based on race, color, religion, sex, age, national origin, and disability. The CSBG Sub-recipient shall be in compliance with all Federal statutes relating to nondiscrimination. These include but are not limited to:

- (a) 45 CFR Part 80, Nondiscrimination Under Programs Receiving Federal Assistance through the Department of Health and Human Services, Effectuation of Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color, or national origin;
- (b) 45 CFR Part 86, Nondiscrimination on the Basis of Sex in Education Programs and Activities Receiving or Benefiting from Federal Financial Assistance;
- (c) 45 CFR Part 84, Nondiscrimination on the Basis of Handicap in Programs and Activities Receiving Federal Financial Assistance, Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 795), which prohibits discrimination on the basis of handicaps;
- (d) 45 CFR Part 91, Nondiscrimination on the Basis of Age in HHS Programs or Activities Receiving Federal Financial Assistance, the Age Discrimination Act of 1975, as amended (42 U.S.C. 6101-6107), which prohibits discrimination on the basis of age;
- (e) The Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse;
- (f) The Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism;
- (g) Sections 523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. 290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patients' records;
- (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. 3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing;
- (i) Any other nondiscrimination provisions in the specific statute(s) made; and,

- (j) The requirements of any other nondiscrimination statute(s) which may apply. The undersigned shall require that all subawards, at all tiers, contain a provision requiring compliance with E.O. 11246, "Equal Employment Opportunity" as amended by E.O. 113675, "Amending Executive Order 11246 Relating to Equal Employment Opportunity," and as supplemented by regulations at 41 CFR part 60, "Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor."

**E. Beason-Hammon Alabama Taxpayer and Citizen Protection Act**

Effective immediately, Act 2012-491 amends and supplements Alabama's existing immigration law. As of July 5, 2012, the following changes and/or additional measures must be implemented per instructions from the State Comptroller.

1. Any business entity or employer that employs one or more employees within the State of Alabama and accepts the award of any contract, grant, or incentive by the state or a state-funded entity shall provide documentation establishing that the business entity or employer is enrolled in the E-Verify program.
2. Any subcontractor on a project paid for by contract, grant, or incentive by the state or a state-funded entity shall not knowingly employ, hire for employment or continue to employ an unauthorized alien within the State of Alabama, and shall also enroll in the E-Verify program prior to performing any work on the project. This means any subcontractor regardless of its tier.
3. As a condition for the award of any contract, grant, or incentive by the state or a state-funded entity to a business entity or employer that employs one or more employees, the business entity or employer shall not knowingly employ, hire for employment, or continue to employ an unauthorized alien within the State of Alabama.

**Section VIII- Financial Policies and Procedures**

**A. Financial Guidelines**

Each agency should develop and maintain their own financial guidelines to ensure that proper internal controls are in place to keep the agency in compliance with Federal and State financial mandates regarding CSBG expenditures. The aforementioned guidelines will enact policies and procedures to manage the maintenance of records, procedures for disbursement, maintenance of property records, and procurement procedures.

All agencies have at their disposal a litany of fiduciary and programmatic literature (IM-37, IM-49, IM-81, IM-82, OMB Circular A-110, OMB Circular A-122, and OMB Circular A-133) in addition

to this manual which provides guidance on financial standards which each agency is required to adhere to pursuant to the CSBG Act.

### **B. Fidelity Bond**

Each agency is required to have a current fidelity bond providing adequate coverage for any instances in which the agency is liable for the reimbursement of Federal and/or State funds to the grantor. HHS reserves the right to require agencies to maintain adequate bonding and insurance if the current bonding or insurance is deemed inadequate to protect the interests of the Federal Government (OMB Circular A-110 Subpart C § 21 (d)).

### **C. Financial Management**

Federal awarding agencies shall require recipients to relate financial data to performance data and develop unit cost information whenever practical. The following requirements have been cited from OMB Circular A-110. Strict adherence to these regulations will be verified through agency monitoring visits. Agencies are required to maintain a cash receipts journal, cash disbursement journal, and a general ledger.

Agencies' financial management systems shall provide for the following.

- (1) Accurate, current and complete disclosure of the financial results of each federally-sponsored project or program in accordance with the reporting requirements set forth in Section \_\_\_\_ .52. If a Federal awarding agency requires reporting on an accrual basis from a recipient that maintains its records on other than an accrual basis, the recipient shall not be required to establish an accrual accounting system. These recipients may develop such accrual data for its reports on the basis of an analysis of the documentation on hand.
- (2) Records that identify adequately the source and application of funds for federally-sponsored activities. These records shall contain information pertaining to Federal awards, authorizations, obligations, unobligated balances, assets, outlays, income and interest.
- (3) Effective control over and accountability for all funds, property and other assets. Recipients shall adequately safeguard all such assets and assure they are used solely for authorized purposes.
- (4) Comparison of outlays with budget amounts for each award. Whenever appropriate, financial information should be related to performance and unit cost data.
- (5) Written procedures to minimize the time elapsing between the transfer of funds to the recipient from the U.S. Treasury and the issuance or redemption of checks, warrants or payments by other means for program purposes by the recipient. To the extent that the provisions of the Cash Management Improvement Act (CMIA) (Pub. L. 101-453) govern, payment methods of State agencies, instrumentalities, and fiscal agents shall be consistent

with CMIA Treasury-State Agreements or the CMIA default procedures codified at 31 CFR part 205, "Withdrawal of Cash from the Treasury for Advances under Federal Grant and Other Programs."

(6) Written procedures for determining the reasonableness, allocability and allowability of costs in accordance with the provisions of the applicable Federal cost principles and the terms and conditions of the award.

(7) Accounting records including cost accounting records that are supported by source documentation.

Agencies will be responsible for maintaining a cash receipts journal in which all transactions are recorded thoroughly with the correct corresponding amounts. In the instance there is some type of refund, this credit will be recorded in the journal accompanied by an explicit explanation of this transaction.

In addition to a cash receipts journal, all agencies must maintain a cash disbursement journal documenting all expenditures.

In accordance with OMB Circular A-110 Subpart C § 21 (b) (3), all agencies are encouraged to have dual signature checks. ADECA encourages one of these signatures be that of a designated Board Member and the other a designated staff member. Agency checks should always be kept in a secure area. If signature stamps are utilized, the stamps must be secured in a location that can be locked up to prohibit access from unauthorized personnel. ADECA discourages the use of signature stamps due to the uninhibited potential for fraud. The agency should ensure all checks are numbered consecutively with any missing checks accounted for by financial staff.

The Agency Director shall receive a monthly budget to compare budgeted costs with actual costs. When possible, financial information should be related to performance data.

All agencies will be required to maintain all accounting documentation as well as supporting documentation to augment any expenditures and/or credits as deemed necessary. The following documentation must always be maintained by the agency:

- Initialed invoices validating prior approval of payment
- Invoices with the grant number and grant name clearly identified on the document
- Invoices shall include a description of the services rendered or items purchased. The invoice will also include the identification of the vendor, unit price (if applicable), and total cost to be charged to CSBG funds.
- Personnel charges will be documented with time and attendance records. Records must be based on an after-the-fact determination of the actual activity of each employee.

Budget estimates do not qualify as support for charges to awards. (OMB Circular A-122 Attachment B (8.) m. (2.) (a))

- All contracts utilizing CSBG funds must be in writing
- Travel costs will be thoroughly documented indicating time, purpose, mode, point(s) of destination and expense. All travel must have prior approval from the appropriate agency official and retained for documentation.

Although not mandated by OMB Circular A-110, ADECA recommends in order to conform with GAAP best practices; all agencies should develop a program to back-up financial documents. Each agency can develop their own contingency procedures as they see fit, as long as some type of procedure is enacted for the protection of financial records.

#### **D. Audits**

The ADECA Audit Policy requires ADECA subrecipients that expend ADECA awards to follow the guidelines outlined in Section XI to determine the subrecipient's audit requirements. The statutory authority for the ADECA Audit Policy is the *Code of Alabama 1975*, Sections 41-22-1 through 27 and Section 41-23-6.

#### **E. Procurement Procedures**

##### **1. OMB Circular A-110**

All agencies are required to establish written procurement procedures. The procedures will, at a minimum, ensure:

- a. Recipients avoid purchasing unnecessary items
- b. Where appropriate, an analysis is made of lease and purchase alternatives to determine which would be the most economical and practical procurement for the Federal Government.
- c. Solicitations for goods and services provide for all the following.
  - (i) A clear and accurate description of the technical requirements for the material, product or service to be procured. In competitive procurements, such a description shall not contain features which unduly restrict competition.
  - (ii) Requirements which the bidder/offeror must fulfill and all other factors to be used in evaluating bids or proposals.

(iii) A description, whenever practicable, of technical requirements in terms of functions to be performed or performance required, including the range of acceptable characteristics or minimum acceptable standards.

(iv) The specific features of "brand name or equal" descriptions that bidders are required to meet when such items are included in the solicitation.

(v) The acceptance, to the extent practicable and economically feasible, of products and services dimensioned in the metric system of measurement.

(vi) Preference, to the extent practicable and economically feasible, for products and services that conserve natural resources and protect the environment and are energy efficient.

All procurement transactions shall be conducted in a manner to provide, to the maximum extent possible, open and free competition. The agencies should be cognizant of organizational conflicts of interest in addition to noncompetitive practices among contractors that could potentially obstruct fair competition or fair trade.

All agencies shall comply with the nonprocurement debarment and suspension common rule implementing E.O.s 12549 and 12689, "Debarment and Suspension." This common rule restricts subawards and contracts with certain parties that are debarred, suspended or otherwise excluded from or ineligible for participation in Federal assistance programs or activities. Agencies will be required to properly vet all potential contractors/vendors utilizing the Federal website, [www.epls.gov](http://www.epls.gov), and with conversation with the legal staff at ADECA to verify this contractor/vendor is not prohibited from Federal or State assistance programs.

## 2. **State Bid Law**

In addition to the standards set forth above in OMB Circular A-110, agencies are required to adhere to the State Bid Laws which can be referenced in the ***Code of Alabama***, Article 2, Sections 41-16-20 through 41-16-32 and Section 41-16-72.

The State Bid Law requires all contracts of whatever nature for labor, services, work, or for the purchase or lease of materials, equipment, supplies, or other personal property, involving \$15,000 or more, made by or on behalf of any state department, board, bureau, commission, committee, corporation, authority, or office, shall, except as otherwise provided in this article, be let by free and open competitive bidding, on sealed bids, to the lowest responsible bidder. The (Subgrantee, Recipient, Contractor, etc.) shall be responsible for complying with any and all State laws which shall be applicable under the terms and provisions of this Agreement including but not limited to

the Alabama Competitive Bid Law, any State permitting requirements, and the Beason-Hammon Alabama Taxpayer and Citizen Protection Act (Act No. 2011-535).

In regard to the need for procurement of professional services, a notice of need for professional services (Request for Proposal) shall be widely disseminated to the professional community in a full and open manner. When such professional services are needed, the purchasing entity shall solicit proposals from the professional service providers desiring to receive requests for proposals. The purchasing entity shall select the professional service provider that best meets the needs of the purchasing entity as expressed in the Request for Proposal.

All records for real property and equipment acquired with Federal funds shall be retained for 3 years after final disposition.

#### **F. Expenditure Reports**

Expenditure reports are to be submitted to ADECA's CSBG Unit on a monthly basis. The reports must be received no later than the 10<sup>th</sup> of the month following the month covered by the report. The report should contain the invoice page and the expenditure back-up form for administrative and programmatic costs.

The CSBG Sub-recipient may operate on an advance or reimbursement basis. If the Sub-recipient elects to operate on an advance basis, it may request an advance of funds sufficient to finance the CSBG program for up to forty-five (45) days.

The report should be submitted on Form 25, Admin-Program Expenditure - Budget form.

#### **G. Budget Modifications**

Budget modifications must be submitted to ADECA's CSBG Unit whenever a budget line item is overspent by 10% or more. Expenditure Reports will not be processed if the expenditure back-up form indicates line items are overspent by 10% or more, unless a budget modification has been received by CSBG staff.

Budget modifications may be submitted by email.

#### **H. Purchase or Permanent Improvements of Real Property**

The use of CSBG funds are prohibited for the purchase or improvement of land, or the purchase, construction or permanent improvement (other than low cost residential weatherization or other energy related home repairs) of any building or other facility except as defined in Section 678 (F) of the Community Services Block Grant Act.

## I. Purchasing Guidelines

Any single item purchase of \$500 or more, with funds from CSBG, will require the prior approval of the CSBG Program Manager. This approval may be requested via e-mail, facsimile, or US mail, but written approval must be obtained prior to the purchase.

A PMU1 form must be completed and submitted to CSBG within 30 days of purchase for any single item equipment purchase of \$500 or more. For an electronic version of this form, you may contact CSBG staff. Invoices/receipts and procurement documentation should be submitted with the PMU1 form.

**This policy does not affect guidelines set forth in the *ADECA Recipient Property Management Manual*.**

## J. Property Management

Each agency is required to maintain an ADECA Recipient Property Management Manual on premise as a reference tool for compliance with ADECA property management guidelines. The agency will also be required to conduct an annual inventory inspection to ensure accountability for all property items in possession of the agency. If the agency intends to dispose of any property purchased with State/Federal funds, they must receive written approval from ADECA prior to the disposition of any property.

Any questions, regarding the property management information contained herein, may be directed to CSBG program staff at 334.242.5400.

## K. Retention of Records

Records shall be retained for a period of five (5) years from the submittal of the final financial report or receipt of final payment with the exception of the following qualification, whichever is latest: If any litigation, claim or audit is started before the expiration of the five-year (5) period, the records shall be retained until all litigation, claims, or audit findings involving the records have been resolved. The Subgrantee will provide the Department, the Comptroller General of the United States or any of their authorized representatives, access to any pertinent books, documents, papers, or other records in order to make audits, examinations, excerpts and transcripts. NOTE: Property/equipment records should be kept for five (5) years from date of disposition. Retention of records involving competitive bids should comply with ***Code of Alabama*** § 41-16-54 (e), as applicable, which requires a retention period of at least seven (7) years.

#### **L. Indirect Costs**

Indirect costs are those that have been incurred for common or joint objectives and cannot be readily identified with a particular final cost objective. Direct cost of minor amounts may be treated as indirect costs under the conditions described in OMB Circular A-122, subparagraph B.2. After direct costs have been determined and assigned directly to awards or other work as appropriate, indirect costs are those remaining to be allocated to benefiting cost objectives. A cost may not be allocated to an award as an indirect cost if any other cost incurred for the same purpose, in like circumstances, has been assigned to an award as a direct cost.

Because of the diverse characteristics and accounting practices of non-profit organizations, it is not possible to specify the types of cost which may be classified as indirect cost in all situations. However, typical examples of indirect cost for many non-profit organizations may include depreciation or use allowances on buildings and equipment, the costs of operating and maintaining facilities, and general administration and general expenses, such as the salaries and expenses of executive officers, personnel administration, and accounting.

Unless different arrangements are agreed to by the agencies concerned, the Federal agency with the largest dollar value of awards with an organization will be designated as the cognizant agency for the negotiation and approval of the indirect cost rates and, where necessary, other rates such as fringe benefit and computer charge-out rates. Once an agency is assigned cognizance for a particular non-profit organization, the assignment will not be changed unless there is a major long-term shift in the dollar volume of the Federal awards to the organization. All concerned Federal agencies shall be given the opportunity to participate in the negotiation process but, after a rate has been agreed upon, it will be accepted by all Federal agencies. When a Federal agency has reason to believe that special operating factors affecting its awards necessitate special indirect cost rates in accordance with OMB Circular A-122, subparagraph D.5, it will, prior to the time the rates are negotiated, notify the cognizant agency.

#### **M. Contracts**

Contracts will be originally written for fifteen (15) months. The duration of an agreement may be extended an additional three (3) months if necessary but the Sub-grantee must receive prior approval from the Community and Economic Development Division CSBG Unit before any extensions are granted. **Beginning with Fiscal Year 2013, under no circumstances will a contract be extended beyond eighteen (18) months.**

#### **N. Termination of the Agreement, Reduction, or Suspension of Funding**

In the event that ADECA elects to, for cause, terminate reduce or suspend funding to the subrecipient, it shall do so in accordance with the provisions of Chapter 305-2-3, "Eligible Entity Fair Hearing Policy and Procedure" of the Administrative Code, Alabama Department of

Economic and Community Affairs, State of Alabama, as adopted on June 13, 1997. Causes for termination, reduction or suspension of funds by ADECA may include:

- (1) Failure of the subrecipient to fulfill its obligations under the CSBG grant agreement and the agency workplan;
- (2) Ineffective or improper use of funds provided under the CSBG grant agreement;
- (3) Failure to provide assurance that, in the case of a community action agency or nonprofit private organization, each board will be constituted so as to assure that one-third of the board are elected public officials, currently holding office, or their representatives, except that if the number of elected officials reasonably available and willing to serve is less than one-third of the membership of the board, membership on the board of appointed public officials may be counted toward meeting such one-third requirement; at least one-third of the members are persons chosen in accordance with democratic selection procedure adequate to assure that they are representative of the poor in the area served; and the remainder of the members are officials or members of business, industry, labor, religion, welfare, education, or other major groups and interests in the community;
- (4) Failure to provide a range of services and activities having a measurable and potentially major impact on causes of poverty in the community or those areas of the community where poverty is a particularly acute problem;
- (5) Failure to follow any of the assurances of the CSBG Program as defined in the Community Services Block Grant Amendments of 1998; and
- (6) If the subrecipient is unable or unwilling to comply with the terms of the CSBG grant agreement or such additional conditions as may be lawfully applied by the State of Alabama.

Where ADECA determines, pursuant to Section 678B of the *Community Services Block Grant Act*, that it will terminate present and future funding of any subrecipient which received funding in the previous fiscal year, ADECA must provide the organization with notice and an opportunity for a hearing on the record prior to terminating funding. If a review by the Secretary of Health and Human Services of ADECA's final decision to terminate funding is requested pursuant to Section 678C of the CSBG Act, the request must be made in writing within thirty (30) days of notification by ADECA of its final decision to terminate funding. The Department of Health and Human Services will confirm or reject ADECA's finding of cause, normally within ninety (90) days. If a request for a review has been made, the State may not discontinue present or future funding until the Department of Health and Human Services confirms ADECA's findings of cause. If no request for a review is made within the 30-day limit, ADECA's decision will be effective at the expiration of that time.

#### **HEARING ON APPEAL.**

Prior to the suspension of funds, or termination of the grant agreement for non-compliance with grant conditions, the subrecipient shall be granted a hearing by ADECA upon written

request made by the subrecipient within ten (10) days from the date of Notification of Intent to Suspend or Terminate the CSBG Grant Agreement. The hearing shall be conducted at ADECA's offices in Montgomery, Alabama, or any other appropriate location at ADECA's discretion, with a written notification of the time, place, and subject matter by ADECA to the subrecipient.

## **Section IX- Reporting Requirements**

### **A. ROMA/IS Report**

The ROMA report is cumulative and should track the progress for each national indicator. Agencies need only to report numbers for indicators where outcomes are achieved. There may be some indicators that will not have any results in the first quarterly report but should be reflected by the end of the year. An IS report is also required at the end of the program year.

All ROMA/IS reporting must be completed and submitted through FACSPRO to ADECA. FACSPRO Policies and Procedures must be followed when completing these reports.

The ROMA report is due quarterly. The report is due on the 10<sup>th</sup> of each month following the end of a quarter. Should the 10<sup>th</sup> fall on a weekend, then the report is due on the following Monday. The CSBG IS report is due annually. This report is due in January, following the end of the fiscal year, on a date determined by ADECA.

### **B. Board and Committee Reporting**

All Board and Committee meeting minutes must be uploaded in FACSPRO 14 days following the meeting in which the minutes are approved. The following documents must also be included with their corresponding minutes uploaded to FACSPRO:

1. Agenda
2. Sign-in sheets
3. Reports presented during the meeting

## **Section X- FACS Pro**

### **Purpose**

FACSPRO is a database purchased by the Alabama Department of Economic and Community Affairs (ADECA) for use by local Community Action Agencies, and other agencies who

administer Community Service Block Grant, Low Income Home Energy Assistance Program or Weatherization Assistance Program funds for the purposes of intake, establishing income eligibility, and collecting and tracking data for customers served by the agencies and to track programs offered by the agencies.

Subgrantees are required to use FACSPRO to process all applications for the following administered programs:

- Community Service Block Grant (CSBG); either fully or partially funded Programs
- Low Income Home Energy Assistance Program (LIHEAP)
- Weatherization Assistance Program (WAP)

In addition to the programs funded through CSBG, LIHEAP and WAP, the Subgrantee should also enter all Subgrantee programs into the FACSPRO, either available as a service through the intake process, mass entry, CSBG-IS/ROMA Add-on option in the Report Module, the CongregatePro module or other necessary modules/portions of FACSPRO for the purpose of reporting, specifically to the CSBG-IS/ROMA report.

## **USER/SUBGRANTEE RESPONSIBILITIES**

### **Policy**

#### **Super User Responsibilities**

FACSPRO requires the designation of at least one Super User in the State, and that position is located within ADECA.

The Super User responsibilities include:

- Security group creation and maintenance for FACSPRO
- Create system programs
- Assist with training for System Administrators
- Monitor data and accuracy of data within the system
- Provide technical support to System Administrators regarding FACSPRO
- Facilitate System Administrator meetings on a regular basis

#### **Subgrantee System Administrator Responsibilities**

Each Subgrantee must have at least one System Administrator and one back-up System Administrator.

The Subgrantee System Administrator is responsible to/for:

- Provide training for FACSPRO to subgrantee staff

- Provide training to new System Administrators/back-up System Administrators within the agency
- Monitor the accuracy of data, provide agency reports and system reports to subgrantee managers
- Provide basic technical support such as responding to all agency end user requests for assistance in a timely manner
- FACSPRO software installation and trouble-shooting
- Provide programmatic knowledge of all programs utilized in the software
- Provide subgrantee program set up and maintenance
- Set up subgrantee funds/contracts/grants
- Provide subgrantee user access
- Referral set up
- Vendor file maintenance
- Knowledge of how to use and train modules within FACSPRO
- Create/assist with reports such as Ad Hoc, System Reports, and CSBG IS reports
- Know how to delete customers and action plans from the system
- Maintain updated staffing list within FACSPRO Subgrantee Program Entry
- Maintain subgrantee information

#### **Subgrantee Intake Staff – Application Processing on FACSPRO**

- For each client application, subgrantee intake staff must obtain, enter and verify the information collected from the client.
- The intake worker must complete all required fields during intake which are identified by an underlined title.
  - All other information should be completed when applicant is able to provide.
- Before program services are assigned, the intake worker must make sure that all required information has been entered with no red flags on the FACSPRO intake screen.
- All red flags in FACSPRO must be reviewed and corrected before services/programs are assigned.
- All yellow flags must be reviewed and corrected as necessary.

#### **Subgrantee Management**

FACSPRO provides a centralized system to manage and operate agency programs. For programs funded through CSBG, LIHEAP or WAP, the subgrantee must review and verify income eligibility configuration for each program. This must be done when an agency program is entered into FACSPRO. Documentation of the review and testing of the system for accuracy will be checked during monitoring.

FACSPRO provides system management reports. These reports allow subgrantee managers to evaluate user productivity and capacity, program setup, client peak times and client compliance. Subgrantee managers should develop a procedure to review the information on a

regular basis in order to support system and data integrity.

Available FACSPRO System Reports: (System Report icon in FACSPRO)

- **Agency Report**  
The agency report can be used to review basic information entered into FACSPRO.
  - Optional reporting items are selected in the Sections tab of FACSPRO
    - Main Information
    - Contact Information
    - Notes
    - Hours of Operation
    - Mission Statement
    - MOU
    - Travel Information
    - Insurance
    - Program Information
    - Eligibility Requirements
    - Services
    - Relationship
  
- **Intake Compliance Report**  
The Intake Record Compliance Report can be used to evaluate the number of processing days from creation to intake by employee.
  - Enter starting and ending date range for report
  - Report contains
    - Total number of records created within the entered range
    - Percent of records out of compliance
    - Intake date, date created, days to creation, intake worker name, customer name, system ID
  
- **Outcome Compliance Report**  
The Outcome Record Compliance Report can be used to evaluate the number of processing days from indicator creation to completion by employee.
  - Enter starting and ending date range for report
  - Report contains
    - Total number of outcome achievements completed
    - Percent of records out of compliance
    - Subgrantee program name, indicator completion and creation date, number of days to creation, user name, system ID, customer name
  
- **System Productivity Report by Audit or User Activity:** There are two types of system productivity reports to select from, audit and user activity. The Audit Report can be used to evaluate employee productivity or work load. The report will list by employee the number of client records added and updated within a period. The User Activity

Report lists when each employee logged in and out of the system.

- Audit Report
  - Enter starting and ending date range for report
  - Report contains
    - Total client records added within the entered range
    - Total client records updated within the entered range
    - Number of client records added and updated by employee
- User Activity Report
  - Enter starting and ending date range for report
  - Report contains
    - Employee names, login dates and times and the corresponding logout dates and times within the entered range

### **ADECA Staff – Access to FACSPRO**

All ADECA staff, except for Super Users will have full access user rights to FACSPRO.

### **FACSPRO System Assistance Protocol**

Any troubleshooting regarding subgrantee program entry or usage should be initiated using the Help button in FACSPRO or using the FACSPRO User Manual.

When a user has a question or needs assistance with an issue within FACSPRO, the user should contact their Subgrantee System Administrator or Back-up System Administrator. The System Administrator or Back-up System Administrator should be able to assist with any troubleshooting. If he or she is unable to assist, the System Administrator will then contact the helpdesk at [alhelp@dbafacspro.com](mailto:alhelp@dbafacspro.com). All FACSPRO issues must come through the helpdesk e-mail.

The Super User and/or the FACSPRO programmers review all new features and system enhancement requests to determine the impact on the entire system before implementing.

**WXPRO - Agency must follow all program requirements set forth by Wx program.**

### **Background**

FACSPRO contains a customer intake process and a program module called WxPro. This policy identifies the fields that must be entered by the subgrantee in the intake process to determine Weatherization Assistance Program (WAP) eligibility and the information required in the WxPro module.

## Policy

FACSPRO must be used to determine WAP eligibility, income eligibility, Building Weatherization Report (BWR) creation and completion, agency cost and recertification.

WxPro Module Sections:

**Review Queue:** Select the appropriate category from the drop down menu to determine the status of all WAP applicants. The list includes

- Waitlisted
- Deferral
- Assessment
- Update
- Bid
- Scheduling
- In Progress (creation and completion of BWR)
- Change Order
- Final Inspection
- Rework
- Complete
- Invoicing
- Follow Up
- Closed

**WAP Application:** The application displays information on the application in the WxPro module including the system ID, Job number, address and current queue. The application can be updated using the Update Status/Movement tab to move the application to the next step in the process, e.g. from Assessment to Bid.

## WAP FACSPRO Data Flow

The required WAP information is collected via the FACSPRO system through the following process:

1. Client Intake data is entered under Customer Intake where program eligibility and income eligibility are determined.
2. Priority points are also determined by information entered in the Customer Intake module.
3. An application is automatically created for a client's household once that client is enrolled into Weatherization.
4. Once a client is enrolled into the program, all Weatherization activity takes place within WxPro.

## Agency Cost

- BWRs reflect agency cost for the previous month

- Agency cost is entered into FACSPRO monthly
- If no houses are weatherized at the beginning of a new contract period then dwellings is left blank.
- When the dwellings are weatherized following either a month or months of no production, then the agency costs incurred during month(s) of no production are to be entered into FACSPRO and thereby included on the BWRs for the month being reported. The Super User will have to enter in the number of dwellings being reported to correctly assign the incurred agency cost per dwelling.
- Once the dwellings are entered into the system the first time by ADECA's Super User, the system will automatically pull the dwellings for the rest of the grant contract.

**Weatherization Recertification:** For all applicants who have been on file for at least twelve (12) months and have not had their homes assessed and scheduled to be weatherized must be recertified before any further movement towards assessment or bidding is done. Updated information must be obtained from client and entered into FACSPRO and then WxPro must be updated and points recalculated before any further progress is allowed within WxPro. If an applicant is updated and moved to assessment and then progresses no further for at least another twelve (12) months, then that applicant will again have to be recertified prior to moving to the bid process.

## **BOARDPRO**

### **Purpose**

FACSPRO contains a board meeting tracking module called BoardPro. This policy will identify the fields that must be entered by the subgrantee in BoardPro.

### **Policy**

The following Board Pro sections must be maintained and updated by the subgrantee.

- **Board Setting:** The Board Setting section of Board Pro allows the subgrantee to enter the following fields.
  - General Information
    - Total Members on Board
    - Number of Members to make Quorum
    - Default days after meeting for minutes submission
    - By-Laws – The subgrantee's current **by-laws must be attached as a pdf file** to FACSPRO.
    - Quorum effective date
  - Sector Profile

- A description of the board member sector representation and the number needed
- **Board Member Info:** The Board Member Entry section of Board Pro allows the subgrantee to enter in general contact information, terms, and committee data on each board member. The following fields are required.
  - General Information
    - First Name
    - Last Name
    - Representing
    - Email
    - Contact numbers
    - Mailing/Physical address including county
  - Term
    - Term Start Date
    - Term End Date
    - Sector
    - Title
  - Committee
    - Term Start Date
    - Term End Date
    - Committee
    - Title
  - Certification/Licenses/Workshops
    - Any trainings/workshops attended by Board Members for the agency should be entered here
- **Board Meetings/Committee Meetings:** The Board Meeting section of Board Pro allows the subgrantee to enter in board meeting schedules and track the board member attendance. The following fields are required. **All general information and attendance should be entered into FACSPRO following a meeting within 7 days excluding minutes.**
  - General Information
    - Date of Meeting
    - Time
    - Location
    - Type of Meeting
    - **Minutes must be attached to FACSPRO within 14 days of the following Board Meeting where the minutes are approved.**
  - Attendance
    - Member

- Employee
  - Type of attendance
- Alerts should be reviewed and subgrantee should make sure vacant Board seats are filled within 120 days

## **MODULES**

### **Policy**

The subgrantee must use the following FACSPRO modules and the required options to be in compliance.

#### Customer Intake:

- The subgrantee intake worker must:
  - Enter all pertinent information correctly for the client in the Address, Demographics, Household, and Income menu options. Options must not be highlighted in red. All options highlighted in yellow must be reviewed.
  - If a client resides along a County line it is possible that FACSPRO will incorrectly assign the County. In this case the County can be changed based on where the property taxes or purchased vehicle tags are paid. When this occurs the County can be changed in the system on the address screen and on the demographics - Geographic's screen.
  - Identify and setup eligible programs for the client in the program menu option. Select a template for the action plan.

#### Action Plan:

- The subgrantee staff worker must:
  - Review the action plan
  - Complete and update the status of all pertinent tasks and interventions
    - Reminder that Interventions must be completed to get numbers for ROMA and IS report
  - Once a program is finished for a client then the client's action plan must be moved from in progress to either closed or completed in order for the client to no longer come up as enrolled in the program on the ROMA/IS report.

#### System Admin:

- The subgrantee should:
  - Enter the following fields in the Agency Main menu option
    - Name of Agency, Address, City, State, Zip, Phone numbers and extensions, Main email address, Website if applicable, and Agency

### Acronym

- Enter the key personal in the Contact Information menu option
- Enter the hours of operation in the Hours of Operation menu option
- Enter the mission statement in the Mission Statement menu option

### Mass Entry or CAA IS (CSBG ROMA/IS Report):

- The subgrantee must use this option to enter information into FACSPRO for the CSBG ROMA/IS report.

FACSPRO will generate the ROMA/IS report from the data entered into the system. The data is not all automatically generated. Additional information must be collected, tracked and maintained outside of FACSPRO. Source documentation must be available for review to support the information not maintained by FACSPRO. The subgrantee should enter any data that is not available in FACSPRO either through the mass entry module or through the CAA IS (CSBG-IS Report) report Add-on option.

### CAA IS Report Requirement for ROMA/IS Reports:

- Information entered in FACSPRO:
  - ADECA will use the auto-fill feature in FACSPRO to populate information into the CAA IS report module for the following sections. Subgrantees will need to review information pulled from system.
    - **Part 1: Section G Program Participant Characteristics**
    - **Part 2: Goal Information**
  - The CAA IS Report module will allow the subgrantee to enter several text fields into the reports that are not automatically generated by FACSPRO. Review the CAA IS Report Text Field list for those items not collected and generated by FACSPRO during program administration but required in the CSBG-IS Report.
- Information collected outside FACSPRO:
  - The subgrantee may have collected information outside of FACSPRO prior to implementation. This information must be entered into the Mass Entry module or into the CAA IS Report Add-on option.
- The subgrantee must review the information in each section and in each additional CAA IS Add-on Report for accuracy before submitting it to ADECA.
- All subgrantee programs must be reported in the CAA IS Report(s) submitted to ADECA by the required deadlines.

### Steps used by ADECA to run the CSBG-IS Report in FACSPRO:

- Open FACSPRO and login

- Double-Click on System Reports icon
- Click on the Other Reports tab
- Click on the CAA IS Report icon
- Click on the New button
- IS Report Name: Enter the report name
- Report Type: Select Regular
- Click the Save button
- Click on Auto-fill

Steps used by Agencies to run the CSBG-IS Add-On Report(s) in FACSPRO:

- Open FACSPRO and login
- Double-Click on System Reports icon
- Click on the Other Reports tab
- Click on the CAA IS Report icon
- Click on the New button
- IS Report Name: Enter the report name
- Report Type: Select Add-On
- Click the Save button
- Use the Forward and Backward buttons to move within the report
- Enter Additional Information as needed

Steps used by Agencies to submit CSBG-IS Report to ADECA:

- Open FACSPRO and login
- Double-Click on System Reports icon
- Click on the Other Reports tab
- Click on the CAA IS Report icon
- Double-Click on the current report name to view
- Click the Submit button

CAA IS Report Text Field: Additional Information to be entered in CSBG-IS Report (This is for the IS report only. It does not include the ROMA Report.):

- **Part 1: Section D. Accomplishments and Coordination of Funds**
  - Describe an agency strategy which addresses a long-term solution to a persistent problem affecting members of the low-income community
    - How did the agency identify the community need?
    - How were CSBG funds used to plan, manage, and/or develop the approach?
    - What local partners were involved, and how did each contribute to the program?
    - What outcome indicators did the agency use to measure success?
    - What outcomes have resulted in the reporting fiscal year? If no outcomes yet, when?

- Delivering High-Quality, Accessible, and Well-Managed Services
  - Describe the agency's top 3 management accomplishments
- Mobilizing Resources to Support Innovative Solutions
  - Describe a cause or condition of poverty in the community using an innovative or creative approach. Describe how your agency relied on mobilization and coordination of resources to help reach interim and final outcomes.
    - Description of program by a CSBG service category
    - How was the agency's approach innovative or creative?
    - Outcomes achieved
    - How were CSBG funds used?
    - What local partners were involved, and how did each contribute to the program?
- Providing Positive Results for Vulnerable Populations
  - Describe one youth-focused initiative that illustrates how CSBG funding was used and coordinated with other programs and resources.
    - Description of initiative
    - What local partners were involved, and how did each contribute to the program?
    - Outcomes achieved
    - How were CSBG funds used?
  - Describe one senior-focused initiative
    - Description of initiative
    - What local partners were involved, and how did each contribute to the program?
    - Outcomes achieved

**Part 1: Section E. CSBG Expenditures by Service Category**

- List CSBG funds expended for each service category
  - Education
  - Emergency Services
  - Employment
  - Health
  - Housing
  - Income Management
  - Linkages
  - Nutrition
  - Other
  - Self Sufficiency
- CSBG funds expended for Administration
- CSBG funds expended by demographic category
  - Youth (ages 12-18)
  - Seniors (ages 55 and up)

- **Part 1: Section F. Other Resources Administered and Generated by the CSBG Network**
  - Federal Resources
    - Amount of Fiscal year CSBG allocated to reporting agency
    - Federal Resources other than CSBG
    - Weatherization (DOE)
    - LIHEAP – Fuel Assistance
    - LIHEAP – Weatherization
    - Head Start
    - Early Head Start
    - Older Americans Act
    - SSBG ☐ Medicare/Medicaid
    - Temporary Assistance to Needy Families
    - Child Care Development Block Grant
    - Other HHS Resources
    - WIC (USDA)
    - All USDA Non-Food programs
    - All other USDA Food programs
    - CSBG- Federal, State, and Local
    - Housing Programs (HUD)
      - Section 8
      - Section 202
      - Home tenant based assistance
      - Emergency shelter grant program
      - Continuum of Care
    - All other HUD including homeless programs
    - Employment and training programs
    - Other Department of Labor (US DOL) programs
    - Corporation for National and Community Service programs
    - FEMA
    - Transportation (US DOT)
    - Department of Education
    - Department of Justice
    - Department of Treasury
    - Other Federal Sources
  - State Resources
    - State Housing and Homeless programs
    - State Nutrition programs
    - State Day Care and Early Childhood programs
    - State Energy programs
    - State Health programs
    - State Employment and Training programs
    - State Head Start programs
    - State Senior programs

- State Transportation programs
- State Education programs
- State Community, Rural and Economic Development programs
- State Family Development programs
- Other State Resources
- Local Resources
  - Amount of unrestricted funds appropriated by local government
  - Amount of restricted funds appropriated by local government
  - Value of contract services
  - Value of in-kind goods/services received from local government
- Private Sector Resources
- Funds from foundations, corporations, United Ways, other non-profits
  - Other donated funds
  - Value of other donated items, food, clothing, furniture, etc.
  - Value of in-kind services received from businesses
    - Payments by clients for services
    - Payments by private entities for goods or services for low-income clients or communities

## **MASS ENTRY**

### **Purpose**

FACSPRO contains a mass entry module for capturing additional information from subgrantee programs not setup in FACSPRO. This policy will identify the fields that must be entered by the subgrantee to be compliant with the CSBG-IS (CAA IS) report.

### **Policy**

The mass entry module must be completed prior to starting the reporting process for the CAA IS report. The subgrantee can enter information in the mass entry module throughout the year. The subgrantee is responsible for providing and maintaining source documentation supporting the information entered in the mass entry module.

### **Steps:**

- Prepare source documentation for reference during data entry
- Open FACSPRO and login
- Double-Click on the Mass Entry Icon
- Click the New button
- Enter all required fields

#### Mass Entry Module Required Fields:

- **Dimension:** Select the most appropriate dimension from the drop down list Examples: Basic Needs, Community Relations, Education, Emergency Services, Employment, Energy, Food, and Family – Basic Needs etc.
- **System Program:** Select the most appropriate system program from the drop down list. The system program list is associated with the dimension. Examples: Emergency Services, Weatherization, etc.
- **Agency Program:** Select the most appropriate agency program from the drop down list.
- **Intervention:** Select the most appropriate intervention from the drop down list. Examples: Client receives emergency assistance; Home receives repair services, etc.
- **Indicator:** Select the most appropriate indicator from the drop down list. Examples: 6.2.J Emergency Disaster Relief, 2.1.D Safe and affordable housing units in the community preserved or improved through construction, weatherization
- **Location:** Enter the location this service or program occurred.  
**Unit:** Select the most appropriate unit from the drop down list. Examples: Events/Efforts, Households, Individuals, Meals, Project/Initiatives etc.
- **# Served:** Enter the number served for the program.
- **Value:** Enter the value of the program if applicable.
- **Begin Date:** Enter the starting date of the program.
- **End/Actual Date:** Enter the ending date or the actual date of the program.
- **IS Included:** Check the IS Included box for Indicators 1, 5 or 6 to ensure the # served will be counted in the IS report.

#### REQUIRED REFERRALS

##### **Purpose**

This is to be in compliance with CSBG Act Section 678g(b) regarding child support and CSBG Act Section 676(b) regarding the Workforce Investment Act of 1998 (career centers).

## Policy

The required referrals must be completed when there are households that are eligible for child support but not receiving it or should be registered with the career center because some in the household has no income and is 18 or older.

### Child Support

- A client is marked as a Single Parent male or female with children
- No income recorded under Child Support
- On the programs screen a warning will come up, "There is an individual in this family that needs to be referred for Child Support".
- Agency worker will give client a referral and then click on Required Referrals in the programs screen.
- The date of the referral for Child Support will be made and any necessary notes will be entered.

### Workforce Investment Act of 1998 (Career Center)

- A client is marked unemployed or no income source
- On the programs screen a warning will come up, "There is an individual in this family that has no earning and hasn't been referred to Career Center".
- Agency worker will give the client a referral and then click on Required Referrals in the programs screen.
- The date of the referral for the Career Center will be made and any necessary notes will be entered.

## Section XI- Agency Audit Reports

### ADECA Audit Policy

RULE 305-6-1

Statutory Authority: Code of Alabama 1975, Sections 41-22-1 through 27 and 41-23-6

### TABLE OF CONTENTS

305-6-1-.01 Purpose

305-6-1-.02 Background

305-6-1-.03 Definitions

305-6-1-.04 Subrecipient Audit Requirements

305-6-1-.05 Auditor's Responsibilities

305-6-1-.06 Other Subrecipient Responsibilities

305-6-1-.07 ADECA Responsibilities

305-6-1-.08 Contact Person

NOTE: When referencing the ADECA Audit Policy in publications, please reference it as follows:

ADECA Audit Policy, Alabama Administrative Code, Alabama Department of Economic and Community Affairs, Rule 305-6-1-.01 through .08 (1999)

### **305-6-1-.01 Purpose.**

This ADECA Audit Policy implements the audit requirements of the Single Audit Act Amendments of 1996 (Public Law 104-156), dated July 5, 1996, and OMB Circular No. A-133 Revised (A-133), dated June 24, 1997 (this circular supersedes the previous edition of OMB Circular No. A-133 and rescinds OMB Circular No. A-128); establishes audit requirements for subrecipients that expend ADECA grant awards (federal and state financial assistance). It also implements the requirements of Government Auditing Standards (the Yellow Book) and defines ADECA subrecipient and auditor responsibilities for implementation of and compliance with these audit requirements and audit standards.

### **305-6-1-.02 Background.**

These revised audit requirements are a result of the issuance of OMB Circular No. A133 Revised (A-133) and interpretations of this and other regulations and audit standards.

### **305-6-1-.03 Definitions.**

For the purpose of these audit requirements, the following definitions apply to this policy.

- (1) **"ADECA awards (federal)" or "ADECA funding"** means assistance provided by ADECA in the form of grants, contracts, cooperative agreements, loans, loan guarantees, property **(including donated surplus property)**, interest subsidies, insurance, or direct

appropriations, but does not include direct cash assistance to individuals. It includes awards received directly from ADECA, or indirectly through other units of state and local governments, nonprofit agencies or for-profit entities; but does not include transmittals of State General Fund line item appropriations by the Legislature.

- (2) **"CFDA number"** means the number assigned to a federal program in the Catalog of Federal Domestic Assistance (CFDA).
- (3) **"Common Rule"** means Uniform Requirements for Grants and Cooperative Agreements to State and Local Governments issued by the Office of Management and Budget (OMB) or any subsequent revisions thereto.
- (4) **"Compliance Supplement"** means Circular A-133 Compliance Supplement issued by the OMB, its amendments, or any such documents as OMB or its designee may issue to replace it.
- (5) **"Generally Accepted Accounting Principles"** (GAAP) means those rules and procedures established by professional or authoritative bodies or conventions that have evolved through custom and common usage.
- (6) **"Generally Accepted Auditing Standards"** (GAAS) means those audit standards set forth in the American Institute of Certified Public Accountants Statements on Auditing Standards
- (7) **"Generally Accepted Government Auditing Standards"** means the Government Auditing Standards (the Yellow Book), issued by the Comptroller General of the United States.
- (8) **"Grant"** means an award of financial assistance, including cooperative agreements, in the form of money, or property in lieu of money, by the federal Government to an eligible subrecipient.
- (9) **"Grantee"** means the government to which a grant is awarded and which is accountable for the use of the funds provided. The grantee is the entire legal entity even if only a particular component of the entity is designated in the grant award document.
- (10) **"OMB"** means Office of Management and Budget.
- (11) **"OMB Circular No. A-21"** means Cost Principles for Educational Institutions issued by the OMB or any subsequent revisions thereto.
- (12) **"OMB Circular No. A-87"** means Cost Principles for State and Local Governments issued by the OMB or any subsequent revisions thereto.

- (13) "OMB Circular No. A-102" means Grants and Cooperative Agreements with State and Local Governments issued by the OMB or any subsequent revisions thereto.
- (14) "OMB Circular No. A-110" means Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Nonprofit Organizations issued by the OMB or any subsequent revisions thereto.
- (15) "OMB Circular No. A-122" means Cost Principles for Nonprofit Organizations issued by the OMB or any subsequent revisions thereto.
- (16) "OMB Circular No. A-133 Revised" means Audits of States, Local Governments, and Nonprofit Organizations issued by the OMB or any subsequent revisions thereto.
- (17) "Program-Specific Audit" means an audit of one federal program as provided for in A-133 §.200(c) and .235 and Rule No. 305-6-1-.04(1)(b) of this ADECA Audit Policy.
- (18) "Recipient" means local government or non-profit entity that receives federal awards directly from a federal awarding agency to carry out a federal program.
- (19) "Subgrant" means a federal award or financial assistance in the form of money or property in lieu of money, made under a grant by a recipient (ADECA) to an eligible subrecipient.
- (20) "Subgrantee" means the entity that expends federal awards received from a pass-through entity (ADECA) to carry out a federal program, but **does not include** a vendor or an individual that is a beneficiary of such a program.
- (21) "Subrecipient" means the entity that expends federal awards received from a pass-through entity (ADECA) to carry out a federal program, but **does not include** a vendor or an individual that is a beneficiary of such a program.
- (22) "Vendor" means a dealer, distributor, merchant or other seller providing goods or services that are required for the conduct of a federal program. These goods or services may be for an organization's own use or for use of beneficiaries of the federal program. Additional guidance on distinguishing between a subrecipient and a vendor can be found in A-133 §.210.

#### **305-6-1-.04 Subrecipient Audit Requirements.**

This ADECA Audit Policy requires ADECA subrecipients that expend ADECA awards to follow the guidelines outlined below to determine the subrecipient's audit requirements. The statutory

authority for the ADECA Audit Policy is the Code of Alabama 1975, Sections 41-22-1 through 27 and Section 41-23-6.

- (1) Local Government, Institution of Higher Education, Hospital, and NonProfit Organization Subrecipients
  - a. A subrecipient that expended \$300,000 or more of ADECA awards (federal) during its fiscal year accepts the responsibility to provide a single audit at the conclusion of that fiscal year. Guidance on determining ADECA awards (federal) expended is provided in paragraph 1(c) below. NOTE: A subrecipient that expended less than \$300,000 of ADECA awards (federal) during its fiscal year, but expended federal awards including ADECA awards (federal) **that total \$300,000 or more in the aggregate** during its fiscal year accepts the responsibility to comply with the audit requirements of this paragraph. The audit shall be made in accordance with the applicable requirements of this part [305-6-1.04(1)] and the reporting requirements of 305-6-1-.05 (2)(f) and:
    1. A-133.
    2. Generally accepted auditing standards established by the American Institute of Certified Public Accountants (AICPA).
    3. Any AICPA audit and accounting guides for:
      - II. audits of local governmental units.
      - III. audits of not-for-profit organizations receiving federal awards.
      - IV. AICPA statements of position 98-3, and any subsequent revision.
    4. Government Auditing Standards (the Yellow Book).
    5. Circular A-133 Compliance Supplement (and any subsequent revisions or issuances by OMB).
  - b. When a subrecipient expends \$300,000 or more of ADECA awards (federal) during its fiscal year under only one federal program and the federal program's laws, regulations, or grant agreements do not require a financial statement audit of the subrecipient, the subrecipient may elect to have a program specific audit conducted in accordance with the applicable requirements of paragraph (1)(a) above and the reporting requirements of 305-6-1-.05 (3)(e).

- c. The basis for determining the aggregate amount of ADECA awards (federal) expended is generally based on the following: expenditure/ expense transactions associated with subgrants or subgrant agreements;

cost reimbursement contracts; the disbursement of funds passed through to subrecipients; the use of loan proceeds under loan and loan guarantee programs; **the receipt of federally donated surplus property**; and the receipt or use of program income (see A-133 § .205 for further guidance) on determining ADECA awards (federal) and other pass through or direct federal awards.

A-133 §.205(g) Valuing non-cash assistance states: “donated surplus property shall be valued at . . . the assessed value provided by the Federal agency.” The U. S. General Services Administration (GSA) has provided the following information. For Single Audit Act purposes, GSA determined that the assessed value of federally donated surplus property transferred to state agencies or qualified donees (subrecipients) is 23.3 percent (23.3%) of original acquisition costs. This rate will remain in effect until revised by GSA. Any subsequent revision by GSA of the method or rate to assess the value of federally donated surplus property will be communicated to donees (subrecipients) at the time of the purchase or communicated by other means to be determined by ADECA.

## (2) For-Profit Subrecipients

A-133 does not apply to for-profit subrecipients; however, the circular does state that **the pass-through entity is responsible for establishing audit requirements, as necessary, to ensure compliance with federal awards or audit requirements specified by federal program regulations.** Methods to ensure compliance for federal awards made to for-profit subrecipients may include pre-award audits, monitoring during the contract period, and post-award audits. Therefore, **ADECA reserves the right to require for-profit entities who expend a total of \$300,000 or more from ADECA federal programs to have such programs audited or monitored as ADECA deems necessary by a means determined appropriate to each circumstance. This audit determination process will apply to all such for-profits unless a federal agency issues specific regulations that differ. In this case, the regulatory provisions would apply.**

## (3) Subrecipients Expending Less than \$300,000 of Federal Awards

Subrecipients that expended less than an aggregate of \$300,000 of ADECA awards (total federal financial assistance) shall not be required to have an audit of these funds with

applicable requirements stated above. However, ADECA reserves the right to utilize limited scope audits of ADECA awards (federal) to monitor subrecipients in accordance with A-133 §.400(d)(3). A limited scope audit is defined as agreed upon procedures in accordance with AICPA generally accepted auditing standards or attestation standards that are paid for and arranged by ADECA.

#### **(4) State General Fund Subrecipients**

- a. Subrecipients that expended an aggregate of \$300,000 or more of ADECA awards (State General Fund) during its fiscal year accepts the responsibility to **either**:
  1. Provide an organization-wide audit at the conclusion of that fiscal year with the reporting requirements of 305-6-1-.05 (4)(a).
  - or**
  2. Provide a subgrant agreement(s) audit of these funds at the conclusion of that fiscal year with the reporting requirements of 305-6-1-.05(5)(a).
- b. These audits shall be made in accordance with this policy and:
  1. Generally accepted auditing standards established by the AICPA.
  2. Government Auditing Standards (the Yellow Book).
  3. Compliance with the ADECA subgrant agreement(s) concerning these funds.

NOTE: The above audit requirements do not apply whereby ADECA is a conduit for transmitting line item State General Fund appropriations by the Legislature.

#### **(5) Examples**

- a. During its fiscal year, an ADECA subrecipient expended ADECA awards (federal) of \$50,000 under a subgrant agreement with ADECA Science, Technology and Energy Division and expended ADECA awards (federal) of \$275,000 under a subgrant agreement with the ADECA Workforce Development Division; therefore, the subrecipient expended an aggregate total of \$325,000 (\$50,000 + \$275,000) in ADECA awards (federal). As a result, the subrecipient shall have an audit in accordance with 305-6-1-.04 (1)(a) for its fiscal year.

- b. During its fiscal year, an ADECA subrecipient expended ADECA awards (federal) of \$280,000 under a subgrant agreement with the ADECA Planning and Economic Development Division; \$5,000 in program income and \$20,000 in federally donated surplus property from the Surplus Property Division; therefore, the subrecipient expended an aggregate total of \$305,000 in federal funds. As a result, that subrecipient shall have an audit in accordance with 305-6-1-.04 (1)(a) for its fiscal year.
- c. During its fiscal year, an ADECA subrecipient expended ADECA awards (federal) of \$100,000 under a subgrant agreement with the ADECA Law Enforcement and Traffic Safety Division and expended ADECA awards (federal) of \$75,000 under a subgrant agreement with the ADECA Workforce Development Division; therefore the subrecipient expended an aggregate total of \$175,000 in ADECA funding. This subrecipient shall not be required by ADECA to have an audit of ADECA awards unless it is deemed appropriate by ADECA [see 3056-1-.04(3)].
- d. During its fiscal year, an ADECA subrecipient expended ADECA awards (federal) of \$100,000 under a subgrant agreement with the Planning and Economic Development Division, and expended \$225,000 of other federal awards either direct from a federal agency or indirect through another pass-through entity. Therefore, the subrecipient expended an aggregate total of \$325,000 in federal funds. As a result, that subrecipient shall have an audit in accordance with 305-6-1-.04(1)(a) for its fiscal year.

### **305-6-1-.05 Auditor's Responsibilities.**

**General.** The audit shall be conducted in accordance with Government Auditing Standards (the Yellow Book) and the requirements of A-133.

- (1) Government Auditing Standards. Auditors of ADECA subrecipients must meet and comply with the standards of the General Accounting Office (GAO) publication, Government Auditing Standards (the Yellow Book). These standards are:
  - a. General Standards. The auditors must meet the four (4) general standards in Chapter 3 of GAO Government Auditing Standards (the Yellow Book) which relate to the qualification of the audit staff, the audit organization and individual auditor's independence, the exercise of due professional care in conducting the audit and in preparing the related reports and the presence of a quality control program (internal and external).

1. Auditor Qualifications. The auditor should be proficient in the appropriate accounting principles and standards and in government auditing and must be:
  - i. A certified public accountant (CPA) licensed in the State of Alabama.
  - or
  - ii. An auditor employed by the Alabama Department of Examiners of Public Accounts.
2. Continuing Education and Quality Control Certifications. To ensure that the audit organization has complied with the GAO Government Auditing Standards (the Yellow Book) general standards for government auditing on qualifications (continuing education requirements) and on quality control, the ADECA Audit Section may periodically (if deemed necessary) require the audit organization to submit:
  - i. A biennial certification (for example, on 1/1/97, 1/1/99, 1/1/01, etc.) that the audit organization's government audit staff has met the continuing education requirements as defined in the GAO's Interpretation of Continuing Education and Training Requirements (April 1991 or updated version thereto).
  - ii. A certification every 3 years (for example, on 1/1/95, 1/1/98, 1/1/01, etc.) that the audit organization has met the requirements defined in the GAO Government Auditing Standards (the Yellow Book) on quality control.
  - iii. Audit organizations seeking to enter into a contract to perform an audit in accordance with this audit policy should provide their most recent external quality control review report to the ADECA subrecipient contracting for audit services.
- b. Field Work Standards for Financial and Financial Related Audits. Auditors must follow the field work standards for financial and financial related audits outlined in Chapter 4 of GAO Government Auditing Standards (the Yellow Book). Standards of fieldwork incorporate the AICPA standards of fieldwork for financial audits, and do not restate them but rather prescribe supplemental standards of fieldwork needed to satisfy the unique needs of government financial audits.

- c. Reporting Standards for Financial and Financial Related Audits. Auditors must follow the reporting standards for financial and financial related audits outlined in Chapter 5 of GAO Government Auditing Standards (the Yellow Book). Standards of reporting incorporate the AICPA standards of reporting for financial audits and do not restate them but rather prescribe supplemental standards of reporting needed to satisfy the unique needs of government financial and financial related audits.
- (2) OMB Circular No. A-133 Single Audit Requirements. The audit shall cover the entire operations of the subrecipient or, at the option of the subrecipient, such audit shall include a series of audits that cover departments, agencies, and other organizational units which expended or otherwise administered federal awards during such fiscal year, provided that each such audit shall encompass the financial statements and schedule of expenditures of federal awards for each such department, agency, and other organizational unit, which shall be considered to be a nonfederal entity. The financial statements and schedule of expenditures of federal awards shall be for the same fiscal year.
- a. Financial Statements. The auditor shall determine whether the financial statements of the subrecipient are presented fairly in all material respects in conformity with generally accepted accounting principles. The auditor shall also determine whether the schedule of expenditures of federal awards is presented fairly in all material respects in relation to the subrecipient's financial statements taken as a whole.
  - b. Internal Control. In addition to the requirements of Government Auditing Standards (the Yellow Book), the auditor shall perform procedures to obtain an understanding of internal control over federal programs sufficient to plan the audit to achieve a low assessed level of control risk for major programs (major program determination process is defined in A-133 §.520).
    - 1. Except as provided in paragraph 2 below, the auditor shall:
      - i. Plan the testing of internal control over major programs to achieve a **low assessed level** of control risk for the assertions relevant to the compliance requirements for each major program.
      - ii. Perform testing of internal control over major programs as planned in paragraph 1(i) above.
    - 2. When internal control over some or all of the compliance requirements for a major program are likely to be ineffective in preventing or detecting noncompliance, the planning and performing of testing described in paragraph 1. above are not

required for those compliance requirements. However, the auditor shall cite a reportable condition (including whether any such condition is a material weakness), assess the related control risk at the maximum, and consider whether additional compliance tests are required because of ineffective internal control.

NOTE: This guidance on the audit requirement to document and test the internal control structure is from A-133, §.500(c).

c. Compliance. In addition to the requirements of Government Auditing Standards (the Yellow Book), the auditor shall determine whether the subrecipient has complied with laws, regulations, and the provisions of subgrant agreements that may have a direct and material effect on each of its major programs:

1. The principal compliance requirements applicable to most federal programs and the compliance requirements of the largest federal programs are included in the compliance supplement.
2. For the compliance requirements related to federal programs contained in the compliance supplement, an audit of these compliance requirements will meet the requirements of this part. Where there have been changes to the compliance requirements and the changes are not reflected in the compliance supplement, the auditor shall determine the current compliance requirements and modify the audit procedures accordingly. For those federal programs not covered in the compliance supplements, the auditor should use the types of compliance requirements contained in the compliance supplement as guidance for identifying the types of compliance requirements to test, and determine the requirements governing the federal program by reviewing the provisions of the contracts and subgrant agreements and the laws and regulations referred to in such contracts and subgrant agreements.
3. The compliance testing shall include tests of transactions and such other auditing procedures necessary to provide the auditor sufficient evidence to support an opinion on compliance.

NOTE: This guidance on the audit requirements for documenting and testing compliance is from A-133, §.500(d).

d. Major Program Determination: The auditor shall use a risk-based approach to determine which federal programs are major programs. This risk-based approach shall include consideration of:

1. Current and prior audit experience.

2. Oversight by federal agencies and pass-through entities (i.e., evidence of monitoring, etc.).
  3. Inherent risk of the federal program (federal agencies with concurrence of OMB may identify federal programs which are higher risk. According to A-133 §.525, OMB plans to provide this identification in the compliance supplement). The auditor shall follow the four (4) step major program determination process as described in A-133 §.525. As part of this process, the auditor shall also consider the risk analysis criteria for federal program risk that is outlined in A-133 §.525. This section states that the auditor's determination process shall include an overall evaluation of the risk of noncompliance occurring which could be material to a federal program. As suggested in §.525, the auditor may wish to discuss risk factors associated with a particular ADECA federal program with the Audit Section staff and/or the applicable ADECA program manager. For example, oversight by ADECA through monitoring or other reviews may have disclosed significant problems with an ADECA program; this would indicate a higher risk. However, if the results of monitoring or reviews indicated no significant problems with a particular ADECA program, this would indicate a lower risk. ADECA encourages this communication when planning a single audit of an ADECA subrecipient to be performed in accordance with this Policy. One method that can alert auditors of high risk or potential high risk ADECA federal programs will be through the periodic letters to auditors of ADECA subrecipients from the ADECA Chief Auditor.
- e. Audit Follow-Up. The auditor shall follow-up on prior audit findings, perform procedures to assess the reasonableness of the summary schedule of prior audit findings prepared by the subrecipient in accordance with A-133 §.315(b), and report, as a current year audit finding, when the auditor concludes that the summary schedule of prior audit findings materially misrepresents the status of any prior audit finding. The auditor shall perform audit follow-up procedures regardless of whether a prior audit finding relates to a major program in the current year.
- f. Reporting on Single Audits of ADECA Subrecipients. The auditor's reports shall conform to the guidance provided in SOP 98-3 and any subsequent revision and state that the audit was conducted in accordance with A-133 and Government Auditing Standards (the Yellow Book). The minimum reporting requirements for a single audit conducted in accordance with A133.§505 are as follows:

1. An independent auditor's report (opinion or disclaimer of opinion) on the financial statements and the supplementary schedule of expenditures of federal awards which states whether they are presented fairly in all material respects in conformity with generally accepted accounting principles.
2. The financial statements required by generally accepted accounting principles.
3. The notes to the financial statements reflecting all the necessary information essential to fair presentation of the financial statements.
4. A schedule of expenditures of federal awards that meets the minimum requirements of A-133 §.310 (b) and includes the applicable activity defined in A-133 §.205.
5. An independent auditor's report on compliance with requirements applicable to each major program and internal control over compliance in accordance with OMB Circular A-133 and, when applicable.
6. An independent auditor's report on compliance and on internal control over financial reporting based on an audit of financial statements performed in accordance with the Government Auditing Standards (the Yellow Book).
7. A schedule of findings and questioned costs which shall include the following three (3) sections:
  - i. **SECTION I** - Summary of the Auditor's Results. The summary of the auditor's results shall include:
    - I. The type of report the auditor issued on the financial statements (i.e., unqualified opinion, qualified opinion, adverse opinion, or disclaimer of opinion).
    - II. A statement whether any material weaknesses in internal control were disclosed by the audit of the financial statements.
    - III. A statement whether any reportable conditions in the internal control were disclosed by the audit of financial

statements that were not considered material weaknesses.

- IV. A statement as to whether the audit disclosed any noncompliance which is material to the financial statements.
  - V. A statement whether any material weaknesses in internal control over major programs were disclosed by the audit.
  - VI. A statement whether any reportable conditions in the internal control over major programs were disclosed by the audit.
  - VII. The type of report the auditor issued on the subrecipient's compliance with major programs (i.e., unqualified opinion, qualified opinion, adverse opinion, or disclaimer of opinion).
  - VIII. A statement as to whether the audit disclosed any audit findings which the auditor is required to be reported in accordance with A-133 §.510(a).
  - IX. An identification of major programs.
  - X. The dollar threshold used to distinguish between Type A and Type B programs as defined in A-133 §.520.
  - XI. A statement as to whether the subrecipient qualified as a low-risk subrecipient as defined in A-133 §.530.
- ii. **SECTION II** - A Schedule of Findings for the Financial Statements. This schedule shall include those findings, which are required to be reported in accordance with paragraphs 5.18 through 5.20 and Chapter 7 of Government Auditing Standards (the Yellow Book). SOP 98-3, Appendix E provides guidance for reporting for this section.
- iii. **SECTION III** - A Schedule of Findings and Questioned Costs for Federal Awards. This schedule shall include those findings and questioned costs, which are required to be reported in accordance with (A-133 §.510(a)). SOP 98-3, Appendix E provides guidance for reporting for this section.

iv. Audit Finding Presentation. The auditor shall present audit findings in sufficient detail for the subrecipient to prepare a corrective action plan and take corrective action and for ADECA to arrive at a management decision. The following specific information shall be included, as applicable, in audit findings:

(I) Federal program title, CFDA number, ADECA award number (if applicable) and year, name of federal agency, and name the pass-through entity (i.e., ADECA), if applicable.

(II) The criteria or specific requirements upon which the audit finding is based, including statutory, regulatory, or other citation.

(III) The condition found, including facts that support the deficiency identified in the audit finding.

(IV) Identification of questioned costs and how they were computed.

(V) Information to provide proper perspective for judging the prevalence and consequences of the audit findings (for example, whether the audit findings represent an isolated instance or a systemic problem). Where appropriate, instances identified shall be related to the universe and the number of cases examined and be quantified in terms of dollar value. (VI) The possible asserted effect to provide sufficient information to the subrecipient and ADECA to permit them to determine the cause and effect to facilitate prompt and proper corrective action.

(VII) Recommendations to prevent future occurrences of the deficiency identified in the audit finding.

(VIII) Views of responsible officials of the subrecipient when there is disagreement with the audit findings, to the extent practicable.

(IX) Each audit finding in the schedule of findings and questioned costs shall include a reference number to allow for easy referencing of the audit findings during follow-up, i.e., fiscal year of audit and finding number such as 97-1, 97-2, 98-1, 982, etc.

(3) OMB Circular No. A-133 Program-Specific Audit Requirements. When a subrecipient expends \$300,000 or more of ADECA awards (federal) during its fiscal year under only one federal program and the federal program's laws, regulations, or grant agreements do not require a financial statement audit of the subrecipient, the subrecipient may elect to have a

program specific audit conducted in accordance with the applicable requirements of A-133 §.235. These requirements state that at a minimum the auditor shall:

- (a) Financial Statements. Perform an audit of the financial statement(s) for the ADECA/federal program in accordance with Government Auditing Standards (the Yellow Book) and the applicable requirements of A-133.
- (b) Internal Control. Obtain an understanding of internal control and perform tests of internal control over the federal program consistent with the requirements for a major program.
- (c) Compliance. Perform procedures to determine whether the subrecipient has complied with laws, regulations, and the provisions of subgrant agreements that could have a direct and material effect on the federal program consistent with the requirements of a major program.
- (d) Audit Follow-up. Follow up on prior audit findings, perform procedures to assess the reasonableness of the summary schedule of prior audit findings prepared by the subrecipient, and report, as a current year audit finding, when the auditor concludes that the summary schedule of prior audit findings materially misrepresents the status of any prior audit finding.
- (e) Reporting on Program Specific Audits of ADECA Subrecipients. The auditor's reports shall conform to the guidance provided in SOP 98-3, and any subsequent revision and shall state that the audit was conducted in accordance with Government Auditing Standards and OMB Circular A-133. The minimum reporting requirements for a program specific audit in accordance with A133 §.235(b) are as follows:
  - 1. An independent auditor's report (opinion or disclaimer of opinion) on the schedule of expenditures of the federal award as to whether it is presented fairly in all material respects in accordance with the stated accounting policies.
  - 2. Any notes reflecting all the necessary information essential to fair presentation of the schedule of expenditures of the federal award.
  - 3. An auditor's report on compliance with requirements applicable to the federal program and internal control over compliance in accordance with OMB Circular A-133.
  - 4. An auditor's report on compliance with requirements applicable to the federal program and internal control over compliance in accordance with OMB Circular A-133.
  - 5. A schedule of findings and questioned costs for the federal program and includes a summary of the auditor's results applicable to the audit of the federal program in

the format consistent with paragraph (2)(f) 7.(i) above, and findings and questioned costs consistent with the requirements of (2)(f) 7.(iii) and IV above.

(4) Organization-wide Audits of ADECA Subrecipients (ADECA Funds – State General Fund Only). The auditor shall perform the audit in accordance with Government Auditing Standards (the Yellow Book) and this policy.

(a) Reporting on Organization-wide Audits of ADECA Subrecipients (ADECA Funds - State General Fund only). The minimum reporting requirements for this audit are as follows:

1. An independent auditor's report on an audit of the general purpose or basic financial statements that includes a statement that the audit was conducted in accordance with generally accepted government auditing standards or Government Auditing Standards (the Yellow Book).
2. An independent auditor's report on compliance and on internal control over financial reporting based on an audit of the general purpose or basic financial statements performed in accordance with the Government Auditing Standards (the Yellow Book).
3. The general purpose or basic financial statements required by generally accepted accounting principles (GAAP).
4. Notes to the financial statements reflecting all of the necessary information essential for fair presentation of the general purpose or basic financial statements.
5. An independent auditor's report on fraud, abuse, or an illegal act, or indications of such acts, when discovered (a written report is required); normally, such reports are issued separately.
6. An auditor's comment on the status of the correction of the prior year's findings and questioned costs.
7. A corrective action plan shall accompany the audit report and should be prepared on the subrecipient's stationery and signed by its signatory or other appropriate subrecipient official.

(5) Subgrant Agreement Audits of ADECA Subrecipients (ADECA Funds – State General Fund Only). The auditor shall perform the audit in accordance with Government Auditing Standards (the Yellow Book) and this ADECA Audit Policy.

(a) Reporting on Subgrant Agreement Audits of ADECA Subrecipients (ADECA Funds - State General Fund only). The minimum reporting requirements for this audit are as follows:

1. An independent auditor's standard report on an audit of the financial statements for the subject subgrant agreements that includes a statement that the audit was

conducted in accordance with generally accepted government auditing standards or Government Auditing Standards (the Yellow Book).

2. An independent auditor's report on compliance and on internal control over financial reporting based on the audit of the subject contract(s) in accordance with Government Auditing Standards (the Yellow Book).
  3. Balance sheet and statement of support, revenues and expenses and changes in fund balances or statement of revenues, expenditures and changes in fund balances, as applicable.
  4. Notes to the financial statements.
  5. An independent auditor's report on fraud, abuse or an illegal act, or indications of such acts, when discovered (a written report is required); such reports are issued separately.
  6. An auditor's comment on the status of the correction of the prior year's findings and questioned costs.
  7. A corrective action plan shall accompany the audit report and should be prepared on the subrecipient's stationery and signed by its signatory or other appropriate subrecipient official.
- (6) Audit Working Papers and Review. All audit working papers are subject to limited scope review by ADECA. The focus of this limited scope review will be primarily on the documentation of the audit steps necessary to meet the provisions of Government Audit Standards (the Yellow Book), the requirements of A-133 and the ADECA Audit Policy (working papers must also meet applicable AICPA statements on auditing standards). Although most, if not all, of the working papers will be reviewed, the working papers concerning the financial statement audit (other than those concerning the schedule of federal awards) will not be reviewed with the depth that is required for an external quality review. All working papers and reports shall be retained by the audit organization for a minimum of three (3) years from the date of the issuance of the auditor's reports to the subrecipient, unless ADECA notifies the audit organization in writing to extend the retention period. Said working papers shall be made available by the audit organization to ADECA upon request.
- (6) Illegal Acts. If, during or in connection with the audit, the auditor becomes aware of illegal acts, such acts shall be reported in accordance with the provisions of the Government Auditing Standards (the Yellow Book).

### **305-6-1-.06 Other Subrecipient Responsibilities.**

- (1) **General.** The subrecipient shall:

- (a) Identify, in its accounts, all federal awards received and expended and the federal programs under which they were received. Federal program and award identification shall include, as applicable, the CFDA title and number, award number and year (or pass-through entity number as applicable), name of the federal agency, and name of the pass through entity.
  - (b) Maintain internal controls over federal programs that provide reasonable assurance that the subrecipient is managing federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its federal programs.
  - (c) Comply with laws, regulations, and the provisions of contracts or grant agreements related to each of its federal programs.
  - (d) Prepare appropriate financial statements, including the schedule of expenditures of federal awards in accordance with A-133 §.310.
  - (e) Ensure that the audits required by this ADECA Audit Policy are properly performed and submitted when due. When extensions to the report submission due date are granted by the federal cognizant or oversight agency for audit or the ADECA Audit Section, notify promptly the federal clearing house and each pass-through entity providing federal awards of the extension.
  - (f) Follow up and take corrective action on audit findings, including preparation of a summary schedule of prior audit findings and a corrective action plan.
- (2) **Procurement.** In those instances where the State Examiners of Public Accounts do not perform subrecipient audits, subrecipients must follow procurement procedures in accordance with the specific federal program requirement, OMB's Common Rule (as adopted by ADECA), or OMB Circular A-110, as applicable. Subrecipients may use their own procurement procedures to competitively procure audit services so long as they do not conflict with the above stated requirements. In addition, subrecipient procurement procedures should allow small and minority audit firms and audit firms owned and controlled by socially and economically disadvantaged individuals the maximum practical opportunity to compete for contracts awarded to fulfill these various audit requirements.
- (3) **Audit Contract.** Each subrecipient shall enter into a formal written contractual agreement or an audit engagement letter with the auditor that, at a minimum, should reference A-133, Government Auditing Standards (the Yellow Book), and this ADECA Audit Policy and any other requirements that may be specified by federal program regulations. A copy of each subrecipient's written contractual agreement shall be provided to ADECA upon request.
- (4) **Summary schedule of prior audit findings.** If applicable, the subrecipient shall prepare a summary schedule of prior audit findings and submit the summary

schedule with the reporting package defined in paragraph (6) below. The summary schedule shall report the status of all audit findings included in the prior audit's schedule of findings and questioned costs relative to federal awards. The summary schedule shall also include audit findings reported in the prior audit's summary schedule of prior audit findings except audit findings listed as corrected in accordance with paragraph (a) of this section, or audit findings listed as no longer valid or not warranting further action in accordance with paragraph (d) of this section.

- (a) When audit findings were not corrected or were only partially corrected, the summary schedule shall describe the planned corrective action as well as any partial corrective action taken.
- (b) When audit findings were fully corrected, the summary schedule need only list the audit findings and state that corrective action was taken.
- (c) When corrective action taken is significantly different from corrective action previously reported in a corrective action plan or in the federal agency's or pass-through entity's management decision, the summary schedule shall provide an explanation.
- (d) When the subrecipient believes the audit findings are no longer valid or do not warrant further action, the reasons for this position shall be described in the summary schedule. A valid reason for considering an audit finding as not warranting further action is that all of the following have occurred:
  - 1. Two years have passed since the audit report in which the finding occurred was submitted to the federal clearinghouse.
  - 2. The federal agency or pass-through entity (i.e. ADECA) is not currently following up with the subrecipient on the audit finding.
  - 3. A management decision was not issued.
- (5) **Corrective Action Plan.** At the completion of the audit (if applicable), the subrecipient shall prepare a corrective action plan to address each audit finding included in the current year auditor's reports. The corrective action plan shall provide the name(s) of the contact person(s) responsible for corrective action, the corrective action planned, and the anticipated completion date. If the subrecipient does not agree with the audit findings or believes corrective action is not required, then the corrective action plan shall include an explanation and specific reasons.
- (6) **Due Date/Submittal of Audit Report.** Within the earlier of thirty (30) days

after receipt of the audit reports or nine (9) months after the end of the audit period, any ADECA subrecipient that meets the requirements of 305-6-1-.04 (1) shall submit the reporting package described below directly to the ADECA Audit Section (see address below). The reporting package shall include: one copy of the audit report (financial statements, schedule of expenditures of federal awards and applicable auditor's reports); corrective action plan discussed in paragraph (5) above (if applicable); and summary schedule of prior audit findings discussed in paragraph (4) above (if applicable). When the audit reporting package is not expected to be submitted to ADECA within nine (9) months after the end of the audit period, the signatory or other subrecipient official must specify delivery date of the report (in writing) to the Chief Auditor. The mailing address for submitting the reporting package and extension requests is as follows:

Alabama Department of Economic & Community Affairs (ADECA)  
Attention: Chief Auditor  
401 Adams Avenue  
P. O. Box 5690  
Montgomery, AL 36103-5690

- (7) Subrecipients shall submit one (1) copy of the reporting package and a data collection form defined above and in A-133 §.320 (c) & (d) within thirty (30) days after issuance of the audit report to the central clearinghouse located at the following address:

Federal Audit Clearinghouse  
Bureau of the Census  
1201 E. 10th Street  
Jeffersonville, Indiana 47132

- (8) As a result of State legislation (Ala. Act No. 94-414), all subrecipients who receive or disburse **any** public funds (state or federal) must submit a copy of the audit report to:

Alabama Department of Examiners of Public Accounts  
ATTENTION: Audit Report Repository  
P. O. Box 302251  
Montgomery, Alabama 36130-2251

- (9) Subrecipients who expended ADECA federal awards, but expended less than an aggregate of \$300,000 in total federal or state awards, shall submit one (1) copy of the applicable subrecipient financial statement audit to:

Alabama Department of Economic & Community Affairs (ADECA)  
Attention: Chief Auditor

401 Adams Avenue  
P. O. Box 5690  
Montgomery, AL 36103-5690

(10) **Additional Subrecipient Requirements.** ADECA subrecipients that expended ADECA awards (federal) for any of their fiscal years and provided \$300,000 or more to their subrecipients shall:

- a. Ensure that their subrecipients have an annual audit that meets the applicable requirements specified in 305-6-1-.04 (1).
- b. Ensure that appropriate corrective action is taken within six (6) months after receipt of an acceptable audit report in instances of noncompliance with state and federal laws and regulations.
- c. Require each of their subrecipients to permit independent auditors to have access to the records and financial statements necessary to comply with this policy.

NOTE: For their subrecipients that expended less than an aggregate of \$300,000 of ADECA financial assistance, ADECA subrecipients must monitor their subrecipients to ensure compliance in accordance with applicable laws and regulations.

(11) **Access to Subrecipient Records.** Subrecipients shall grant ADECA, the federal grantor agency, the Comptroller General of the United States or any of their duly authorized representatives, access to any books, documents, papers, and records which are directly pertinent to that specific ADECA agreement, for audit, for examination, or review purposes.

### **305-6-1-.07 ADECA Responsibilities.**

(1) **Audit Resolution.** ADECA has the responsibility for making a management decision on whether or not audit findings that could or do affect ADECA programs are sustained, the reasons for the decision, and the expected subrecipient action to repay disallowed costs (if any), make financial adjustments or take other action. Such management decision shall be made within six (6) months from the date ADECA receives an acceptable audit report. In unusual circumstances, the ADECA Director will consider requests to extend this period. In addition, this same resolution period shall apply to the subrecipient's responsibility for overseeing the resolution of audit

findings and/or questioned costs that affect ADECA funded programs or their subrecipients. The ADECA Audit Section has the oversight responsibility to coordinate and ensure that all audit finding(s) that could or do affect ADECA programs are satisfactorily resolved within the time limit stated above. The ADECA Director will be the final authority within ADECA on the management decision of all audit findings. Where applicable, the management decision will describe the appeal process available to the subrecipient.

- (2) Disallowed Costs.** In those instances in which a subrecipient cannot document the allowability of certain cited questioned costs that will meet the applicable federal or state regulations' requirements, ADECA will have no recourse but to disallow these costs. Once this determination is made, the subrecipient will be officially notified by the ADECA Director in writing of such a determination. The subrecipient will be given thirty (30) days from the date of the ADECA Director's letter to remit the amount disallowed. The remittance must be from nonfederal funds.
- (3) Debt Collection.** The debt collection process begins with the ADECA Director's letter to the affected subrecipient and establishes the debt owed to ADECA as a result of costs that were disallowed during the audit resolution process. The subrecipient must remit the disallowed costs or acceptable repayment plan to ADECA within thirty (30) days from the date of the ADECA Director's letter. Those subrecipients who do not remit disallowed costs or an acceptable repayment plan within this time frame may be charged interest (at the applicable prime rate) on the debt starting the day after the due date of the remittance.
- (4) Sanctions.** Those subrecipients who do not remit disallowed costs within the time specified in the ADECA Director's letter and who do not submit a proper audit to meet the requirements of this policy will have certain sanctions imposed upon them as indicated below:

  - (a) Those subrecipients who do not remit disallowed costs within the time specified by the ADECA Director's letter may be charged interest (at the applicable prime rate) on the outstanding balance starting the day after the due date of the remittance. In addition, certain other sanctions may be applied such as:

    1. Suspending funding for existing ADECA funded programs.
    2. Denying participation in any future ADECA funded programs for an applicable period of time.

3. Submitting the names of subrecipients and principal parties to the applicable federal grantor agencies, recommending that these names be included in the U. S. General Services Administration's publication Lists of Parties Excluded From Federal Procurement or Non-Procurement Programs.

**NOTE: There may be rare or isolated instances where extreme and/or unusual circumstances caused the disallowed costs or would present a significant barrier to the repayment of the disallowed costs. In any such instance, the ADECA Director may choose to forego the sanction options listed**

above by instead requiring a resolution that would be more appropriate or mitigating to the individual situation.

(b) In cases of continued inability or unwillingness of a subrecipient to have a proper audit that meets the requirements of this ADECA Audit Policy, ADECA will consider one or all of the following sanctions:

1. Withholding a percentage of ADECA awards (federal) until the audit is completed satisfactorily.
2. Withholding or disallowing overhead costs.
3. Suspending federal awards until the audit is conducted.
4. Terminating the ADECA award (federal).

NOTE: Any federal program that has specific requirements regarding sanctions will require compliance with these sanction procedures in lieu of, or in addition to, those requirements, as applicable on a case-by-case determination by ADECA.

**(5) Use of ADECA Auditors.** Nothing contained in these audit requirements shall be construed to mean that ADECA cannot, in certain situations, utilize its auditors regarding limited scope audits of various ADECA funds. Audits of this nature shall be planned and carried out in such a way as to avoid duplication or not to exceed the audit coverage limits as stated in A-133.

#### **305-6-1-.08 Contact Person.**

Any question or comment should be addressed to the Chief of the ADECA Audit

Section by calling (334) 242-5195.

Correspondence should be addressed as follows:

Chief, ADECA Audit Section  
Post Office Box 5690  
Montgomery, Alabama 36103-5690

or

Chief, ADECA Audit Section  
401 Adams Avenue  
Montgomery, Alabama 36130

Information may also be faxed to: (334) 353-4006.

**Author:** Jim Massey.

**Statutory Authority:** Code of Ala. 1975, 41-23-6.

**History:** Emergency Adoption: Filed September 20, 1989; effective October 1, 1989 through December 21, 1989. **Permanent Adoption:** Filed November 17, 1989; effective December 22, 1989. **Amended:** Filed October 19, 1990; effective November 23, 1990. **Amended:** Filed October 22, 1991; effective December 1, 1991. **Amended:** Filed May 14, 1993; effective June 18, 1993. **Amended:** Filed July 21, 1995; effective September 1, 1995. **Amended:** Filed October 8, 1997; effective November 12, 1997; **Amended:** Filed February 8, 1999; effective March 16, 1999.

## **Section XII- Monitoring**

### **A. Desk and Field Reviews**

ADECA staff will conduct monitoring reviews regarding all funds administered by ADECA. Reviews may be conducted as desk reviews or field reviews. Reviews may be specialized or general in nature. Further, reviews may be conducted by programmatic, audit or compliance staff.

Agencies will be notified in writing by means of a letter to the board chairman with a copy to the executive director. The timing of the notification, and areas to be reviewed, will be in accordance with the policies of the funds and/or division involved.

Both an entrance and an exit conference will be conducted for onsite reviews with the board chairman (or other board member designated for that purpose) and the executive director.

A letter will be issued to the board chairman, and a copy to the executive director, by ADECA stating the results of the review. It should include comments on all areas reviewed and detail any concerns and/or findings. All findings should cite the law, rule, regulation or policy for which noncompliance has been determined. The letter should set a deadline for a response to the concerns/findings in accordance with the division/program policies utilized for the review. Responses should include appropriate documentation. After receipt and review of responses, if findings are not resolved, then corrective actions will be determined in accordance with input from the funding source and the ADECA Corrective Action Plan.

The CSBG unit will, at a minimum, conduct an on-site review of each eligible entity at least once during a three-year period. The review will address prior review findings, agency eligibility, governance, planning process, fiscal, audit reports, program administration, personnel, ROMA implementation, data collection, and reported performance. In addition, at least once per year, CSBG program monitors will visit each agency to offer technical assistance and do a follow-up review of any findings noted in the monitoring visit. On a monthly basis, CSBG program monitors perform a desk audit of each agency. This review consists of reviewing budgets and expenditure reports, quarterly ROMA reports, board rosters and board meeting minutes. An on-site review of a newly designated entity will be conducted immediately after the completion of the first six months in which such entity receives funds through the CSBG program. A subsequent visit will be conducted at the end of the first twelve months of operation.

As noted above, all eligible entities are monitored at least once during a three-year period with at least one follow-up, technical assistance visit every year. Following the on-site review, a report shall be sent to the entities' board chairperson and copied to the executive director describing any deficiencies found with corrective action needed noted and any concerns and recommendation also noted. If there are significant findings, additional follow-up visits may be conducted.

Additional on-site reviews will be conducted when specific concerns are identified that require attention or when an entity is placed on "high-risk". In addition to the on-site monitoring reviews, staff from ADECA's Audit Section perform periodic reviews in coordination with CSBG staff or at the request of ADECA's Director if other Federal, State or local grants have had significant findings or have been terminated for cause.

#### **B. Corrective Action Plan**

In those instances when findings cannot be resolved through additional information or supporting documentation, a corrective action plan must be implemented. In order for there to

be consistency and fairness, ADECA has developed general ranges for those plans in particular circumstances.

Resolution of minor, first time findings, shall be through certification from the board chairman stating that the correction was made through whatever means that were used. The certification should also state that the finding will not reoccur because of the actions taken to preclude it. If requested, the State will provide technical assistance to the agency so as to address any weakness for which the agency has identified as needing clarification or training. Requests for technical assistance should be made in writing.

Serious findings will result in a designation of "high risk". This designation will require that all programs, or funds received through ADECA, be on a reimbursement basis. Reimbursement will require an adequate source of documentation to include copies of cancelled checks. Technical assistance and training will be provided by ADECA, for agency staff, with the goal of preventing any reoccurrences. The designation will remain in place for a specified time and will not be removed until a follow-up review, conducted by ADECA, clearly indicates that all weaknesses that resulted in the designation have been corrected.

The repeat of a serious finding will result in disallowed costs with the required pay back to the State of all ADECA administered state or federal funds involved, as well as the designation of "high risk". Funds used to pay back disallowed costs must be non-federal. The State will remit the returned funds to the original funding source. Technical assistance will be provided by the State and will be mandated for those whose actions or inactions caused or allowed the funds to be disallowed. The designation will remain in place for a specified time and can only be removed through a follow-up review that indicates all weaknesses that resulted in the designation have been corrected. Should an agency use a payment plan, as opposed to a lump sum payment for disallowed costs, failure to remain current may result in a "high risk" designation being reinstated.

A second repeat of a serious finding may result in ADECA proceeding with an Eligible Entity Fair Hearing for the purpose of canceling CSBG funding. It may also result in the recommendation that other funds be moved to another agency. Other funds could be moved outside of the Eligible Entity Fair Hearing process but in accordance with the particular program's requirements.

## **Section XIII Grievance Policy**

### **A. Policy**

The Alabama Department of Economic and Community Affairs (ADECA) will investigate all complaints concerning community action agencies (CAA) that are filed directly with ADECA or any that are referred to the Department. It is the policy of ADECA that all complaints of

whatever nature or reason, involving activities, programs, and other functions of the community action agencies, from any person, company, applicant, employee, and/or other service providers, be appropriately addressed in order to ensure that all parties are afforded due process regarding any complaint.

**B. Procedure**

Depending on the nature of the complaint, the Director will refer all complaints involving the community action agencies to either the Community and Economic Development (CED) Division Chief or appoint an investigating officer. All complaints concerning programmatic and fiscal matters of the community action agency will be first discussed with the executive director or, if necessary, the chair of the board of directors of the community action agency, if so warranted. Upon thorough investigation of the complaint, the CED Division Chief or an investigating officer will provide initial findings to the Director. The Director, at his discretion, may allow initial findings to be finalized or require additional investigation to ensure that all relevant information is thoroughly investigated and fully addressed. Upon compilation of final report, the community action agency will be informed of ADECA's findings. As much as possible, ADECA will mediate complaints in the interest of amicably resolving issues between parties. Should the agency not agree with the findings or the resolution of a complaint, then the agency may file a formal appeal within ninety days of notification of actions from ADECA requesting a hearing with the Director. The appeal must provide detailed information about the agency's efforts to resolve issues and reasons for disagreement.

## **Appendix A**

# Appendix

## **Useful Links**

CSBG Act:

[http://www.acf.hhs.gov/programs/ocs/csbg/pdf/csbg\\_law\\_508.pdf](http://www.acf.hhs.gov/programs/ocs/csbg/pdf/csbg_law_508.pdf)

CSBG State Law (select Title 11-then Title 3- scroll down to 11-96-1thru 11-96-6):

<http://alisondb.legislature.state.al.us/acas/codeofalabama/1975/coatoc.htm>

ADECA - CSBG page

<http://www.adeca.alabama.gov/CSBG/default.aspx>

ADECA – Audit Policy

<http://www.adeca.alabama.gov/C15/Audit%20Section/Document%20Library/ADECA%20Audit%20Policy.pdf>

OMB Circulars, A-110, A-122, A-133, etc.:

[http://www.whitehouse.gov/omb/circulars\\_default](http://www.whitehouse.gov/omb/circulars_default)

Alabama Non-Profit Code (select Title 10A- then Chapter 3)

<http://alisondb.legislature.state.al.us/acas/codeofalabama/1975/coatoc.htm>

Alabama Open Meetings Act (OMA):

<https://www.openmeetings.alabama.gov/generalpublic/publicdefault.aspx>

Code of Federal Regulations – Department of Health and Human Services:

[http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?sid=9610732a1b86eb4178661f58a90d639d&c=ecfr&tpl=/ecfrbrowse/Title45/45cfrv1\\_02.tpl](http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?sid=9610732a1b86eb4178661f58a90d639d&c=ecfr&tpl=/ecfrbrowse/Title45/45cfrv1_02.tpl)

HHS/ACF/CSBG

<http://www.acf.hhs.gov/programs/ocs/csbg/index.html>

CSBG Information Memoranda:

<http://www.acf.hhs.gov/programs/ocs/csbg/guidance/infomemoranda.htm>

Excluded Parties List (debarment):

<https://www.epls.gov/>

Department of Labor Personnel Requirements:

<http://www.dol.gov/compliance/guide/discrim.htm#who>

Grant Opportunities

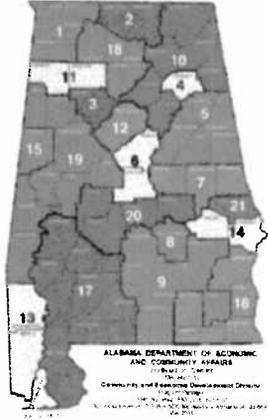
[http://www07.grants.gov/applicants/find\\_grant\\_opportunities.jsp](http://www07.grants.gov/applicants/find_grant_opportunities.jsp)

National Association for State Community Services Programs

<http://nascsp.org/>

## **Appendix B**

**ALABAMA COMMUNITY ACTION PROGRAMS**



**AGENCY NAME:**

# Community Action Plan

# CAP

**CSBG Work Program, Narrative, Expenditure Plan**

## CSBG Planning Guidelines

- CSBG Program Overview
- Submission Requirements
- Planning Allocation

## Fiscal Year 2013

**State of Alabama  
Department of Economic and Community Affairs  
Community and Economic Development Division  
Community Services Block Grant Unit  
401 Adams Avenue  
P.O. Box 5690  
Montgomery, AL 36103-5690**

**PLANS MUST BE SUBMITTED TO ADECA CSBG UNIT BY THURSDAY, SEPTEMBER 20, 2012**

### CSBG Community Action Plan Coversheet and Checklist:

Agency Name: ABC Community Action Agency

Enclosure	Name of Document	Yes	No
A-1	Completed Checklist		
A-2	CAA Agency's Identification		
A-3	Site Locations		
A-4	Agency's Organization Chart		
A-5	CAA Board Roster from FACSPRO		
A-6	Board of Directors' Meeting Schedule		
A-7	Agency's Closing Days		
B-1	Community Needs Assessment Form		
B-2	Service Delivery System		
B-3	Linkages		
B-4	Coordination & Collaboration		
B-5	Community Based Initiatives		
B-6	Coordination with Employment & Training Activities		
B-7	Youth Activities Services		
B-8	Senior Activities Services		
C-1	Planned Expenditure Summary		
C-2	Program Summary Report (printed from FACSPRO)		
C-3	Summary of Program Activities (9 Service Categories)		
C-4	Activities Explanation		
D-1	Agency's Approved Indirect Cost Rate and/or Cost Allocation Plan		
D-2	Current Fidelity Bond		
D-3	CSBG Budget (Administrative/Programmatic)		
D-4	Copy of most recent form 990		
E-1	Certification-Lobbying		
E-2	Certification-Refunding		
E-3	Certification-Assurances		
E-4	Certification-Debarment		
E-5	Certification-Drug Free Workplace		
E-6	Certification-Tobacco Smoke		

**Community Services Block Grant  
Community Action Plan for  
FY 2013**

Submission Date:  Plan Term:

Contract Number:  Federal ID:  DUNS Number:

Agency Name:

Physical		Mailing

Main Office hours of operation:

Agency Website: (if applicable)

Agency Phone:  Fax:

Executive Director:

Email:  Phone:

Chief Fiscal Officer:

Email:  Phone:

Board Chairperson:

Email:  Phone:

Geographic area (counties) to be served:



AGENCY: **ABC Community Action Agency**

**Community Needs Assessment:**

A Community Needs Assessment may be defined as a process to gather input from the target population regarding their current unmet needs and satisfaction with services and procedures. Some form of a formal needs assessment, or community-wide needs assessment, should be conducted at least annually and it must involve the low-income community.

---

**Most recent Comprehensive Community Needs Assessment:**

Title: \_\_\_\_\_

Date: \_\_\_\_\_  
(Enter the date (month/year) when the results were published or when the results were presented to the agency's board)

Timeframe:                      Start Date: \_\_\_\_\_                      End Date: \_\_\_\_\_  
(Enter time period of when the assessment was conducted or the period assessed.)

Timeframe of last update (survey, focus group, etc.): \_\_\_\_\_

Select all that apply:

Agency Client

Community/Agency Service Area

Other Local Service Providers

Agency Staff

Other - Explain \_\_\_\_\_

**Please submit Community Needs Assessment in a separate binder. Include only this summary in the CAP binder**

A. Methodology - describe methods used to gather information on the needs in the community. If surveys were used, include the total number of surveys distributed and returned by county in the agency's service area, the sources used for the distribution, areas surveyed, and persons or organizations that assisted in conducting the survey. Please include a copy of the survey instrument used.

---

---

---

---

---

---

---

---

---

---

(Attach additional page if needed)







**Include a list of agency's partners as an attachment.**

4. How will CSBG funds be used to support the activities described on Program Activity Sheets, (examples: staff salaries, program supplies, consultants, workshops, etc.), as well as the estimated dollar amount to be used for linkages?

Will other funding sources be used? If so, please list the funding sources.

---

---

---

---

---





AGENCY: **ABC Community Action Agency**

**Coordination with Employment & Training Activities:**

If the agency provides E & T activities with Workforce Investment Act Funds, the agency must describe how it will coordinate the provision of employment and training activities in communities with entities providing activities through statewide and local workforce investment systems.

- 
1. Does the agency provide any employment and training activities with **Workforce Investment Act** funds?

Yes

No

Describe how the agency will coordinate the provision of employment & training activities in communities with entities currently providing activities under the **Workforce Investment Act of 1998 (WIA)**.

---

---

---

---

---

---

---

---

---

---

- 
2. Does the agency provide supportive services (such as extended daycare, transportation, skills enhancement, etc.) to participants enrolled in any WIA activity?

Yes

No

3. If yes, describe the activity.

---

---

---

---

---

---

---

---

---

---

- 
4. If activities are noted above, indicate the specific type of costs that CSBG funds will support (examples: staff salaries, program supplies, consultants, workshops, etc.) as well as the estimated dollar amount.

Will other funding sources be used? If so, please list the funding sources.

---

---

---

---

---

---

---

---

---

---



AGENCY: **ABC Community Action Agency**

**Youth Activities/Services:**

How does the agency plan to address the needs of youth in low-income communities through youth development programs that support the primary role of the family?

---

1. Describe how the agency plans to address the needs of youth in low-income communities through youth development programs that support the primary role of the family and give priority to the prevention of youth problems and crime.

---

---

---

---

---

---

---

---

2. Describe how agency will address the needs of youth in communities through youth development programs that 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.

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

3. If activities are noted above, indicate the specific type of costs that CSBG funds will support (examples: staff salaries, program supplies, consultants, workshops, etc.) as well as the estimated dollar amount.  
Will other funding sources be used? If so, please list the funding sources.

---

---

---

---

---

---

---

---



Alabama CSBG Program

Date:

Agency Name:

Planned Program Period:  Beginning Date:

Ending Date:

CSBG Summary of Work Program and Planned Expenditures

Program Accounts	Planned Expenditures
------------------	----------------------

SERVICE CATEGORY:	% of Total Funds	Planned Expenditures
EMPLOYMENT	28%	75,000
EDUCATION	18%	48,000
INCOME MANAGEMENT	6%	15,000
HOUSING	18%	49,000
EMERGENCY SERVICES	19%	49,655
NUTRITION	0%	0
LINKAGES	2%	8,500
HEALTH	0%	0
SELF-SUFFICIENCY	5%	23,000
<b>TOTAL GRANT AMOUNT</b>	<b>100%</b>	<b>268,155</b>
<small>NOTE: Administrative Costs should be included in the total for each category.</small>		
<b>Planned Administrative Costs</b>	<b>18%</b>	<b>48,250</b>

Indicate the expected number of unduplicated families that your agency will provide case management to: \_\_\_\_\_

Indicate the expected number of unduplicated individuals that your agency will provide case management to: \_\_\_\_\_

I certify that the Community Action Plan for FY 2013 has been reviewed and approved by the Board of Directors of the above agency and that all CSBG funded programs/activities are in compliance with CSBG policies.

Date Approved by Board of Directors: \_\_\_\_\_

\_\_\_\_\_  
Board Chairperson Signature/Date

\_\_\_\_\_  
Executive Director Signature/Date

Form with original signature must be sent to ADECA.

## INSTRUCTIONS FOR CREATING PROGRAM SUMMARY REPORT

1. All programs must be set up in FACSPro for the 2013 Program Year in ApplicationPro.
2. If your agency will be striving to achieve Community Goals, then these should also be entered into ApplicationPro as programs. The Following programs contain Community National Performance Indicators:
  - a. Community Empowerment
  - b. Community Engagement
  - c. Community Enhancement
  - d. Community Imporvement and Revitalization
  - e. Community Quality of Life and Assets
3. Once all programs are set up in ApplicationPro, then you will be able to create the Program Summary Report that is to be submitted in the CAP.
4. To create the Program Summary Report, please do the following:
  - a. Click on System Reports
  - b. Click on Other Reports
  - c. Click on Program Summary Report
  - d. Enter CAA name
  - e. Select the 2013 program year (may have more than one) under "Select Application for Targe Goals
  - f. The YTD date range and Month date range may have the same dates. These need to be the same as the date range for your programs set up in ApplicationPro
  - g. Click on Print Preview
  - h. This will create the report that needs to be submitted in the CAP.

**The Program Summary report will pull the Agency Program, the indicators that will be reported on the quarterly ROMA and annual IS reports. The report also gives the number of clients expected to achieve outcomes.**

## Program Summary Report

**Agency: Alabama Department of Economic and Community Affairs**

Goals from Application: ADECA - October 1, 2012 - September 30, 2013 - 10/01/2012

YTD: 10/1/2012 to 9/30/2013      Month: 10/1/2012 to 9/30/2013

Summary of Results	Month	YTD
Customers	0	0
Outcomes Achieved		
Mass/Outreach		
Mass Entry Info		

Action Plan Info	Outcome Indicator	Month	YTD	Goal	% of Goal
<b>Agency Program</b> Emergency Services	Totals: 8.2.A. Emergency Food 8.2.B. Emergency fuel or utility payments funded by LIHEAP or other public and private funding sources 8.2.C. Emergency Rent or Mortgage Assistance 8.2.E. Emergency Temporary Shelter 8.2.F. Emergency Medical Care 8.2.I. Emergency transportation 8.2.K. Emergency clothing			50 25 30 10 25 15 30	
<b>Housing Counseling</b>	Totals: 1.2.H. Obtained safe and affordable housing 8.4.E. Obtained safe and affordable housing			75 25	
<b>Meals on Wheels</b>	8.4.F. Obtained food assistance			125	

## 1. EMPLOYMENT

### Direct Services:

- a. Job Counseling  
Periodic counseling of un- or under-employed participants, including help with job hunting skills or formation of job clubs.
- b. Job Placement/Development  
Consists of comprehensive projects to get jobs for low-income persons. Development means finding vacant positions for which employers agree to interview low-income job seekers. Placement includes setting up job interviews for participating job hunters.  
Summer jobs for low-income young people, providing them income, work experience, etc.
- c. Summer Youth Jobs
- d. Skills training  
Training in skills for which there are immediate or recurring job opportunities. Includes training in word processing, welding, job hunting and similar skills.
- e. Other Employment Services  
Includes Job Banks; and projects to assist in finding jobs for such groups as the elderly, ex-offenders, and women-heads-of-household.
- f. Employment Supports  
Can include support for WIA projects and other employment projects.
- g. Information and Referral  
Information about employment and job training services, and referral to community programs

### Non-Direct Service:

- h. Job Planning and Coordination  
Participation by CSBG staff in local, regional or statewide planning and or coordination of other community employment and job training needs of low-income persons.
- i. Community Organization  
Projects to mobilize community resources to meet the employment and job training needs of low-income persons.
- j. Advocacy  
Projects to increase awareness of identified employment and training needs of the poor.

## 2. EDUCATION

### Direct Services:

- a. Counseling and Guidance  
Providing counsel and guidance to low-income youths and adults about their educational aspirations and opportunities. Can include counseling to high-school dropouts, and to youngsters seeking scholarships to college or technical school.
- b. Public Education/Information  
Educational or information activities conducted by local CSBG operators to inform the general public about the problems and solutions of poverty in their communities.  
Child care and/or classes, frequently providing both child development instruction and support for working parents.
- c. Child Care and Child Development
- d. Adult Basic Education or GED Instruction  
ABE instruction, including classes preparatory to obtaining a high-school equivalency certificate (GED), literacy, math skills and English language.  
All other direct instruction, workshops and tutoring. Includes classes in alcohol and drug abuse education, parenting, alternate education for high school dropouts, craft workshops, etc.
- e. Other Instruction
- f. Other Education Projects  
Includes provision of transportation to education project participants, scholarship programs for low-income students, etc.
- g. Information and Referral  
Information about educational opportunities, and referral to community programs

### Non-Direct Service:

- h. Interagency or Statewide Planning and Coordination  
Cooperation in meeting community education needs through interagency planning and/or coordination. Statewide meetings or conferences to educate the general public or policy makers about the needs of low-income groups. Also, coalition building projects of state CSBG offices to bring together concerned organizations and agencies to study, gather information and recommend solutions to statewide needs to low-income groups.
- i. Other Community Organization  
Local projects to mobilize the resources of communities to identify or meet the educational needs of their low-income citizens. Can include support for activities of Head Start Parent Advisory Councils.  
Projects to increase local awareness of the identified education needs of low-income groups.
- j. Advocacy

### 3. INCOME MANAGEMENT

**Direct Services:**

- |                                   |   |
|-----------------------------------|---|
| a. Household Financial Counseling | Counseling and instructing low-income individuals and families in preparing and implementing household budgets, and about personal, credit and general consumer education issues. |
| b. Income Tax counseling          | Assisting low-income individuals and families to prepare their federal, state and/or local annual income tax reports.   |
| c. Energy Conservation            | Provision of workshops and forums for the general public on the income savings from residential and other conservation measures.  |
| d. Other Projects                 | Other projects to assist low-income person make better use of available income, such as organizing credit unions, food co-ops and car or van pools.                               |
| e. Information and Referral       | Information and referral about income management.   |

**Non-Direct Service:**

- |   |   |
|---|---|
| f. Interagency or Statewide Planning and Coordination | Participation in interagency and/statewide planning and/or coordination to meet the community needs in areas such as residential energy conservation and alternate energy installations and to increase energy program resources. |
| g. Community Organization                             | Projects to mobilize community resources to identify or meet needs of low-income persons to save energy and preserve income.  |
| h. Advocacy   | Projects to increase local awareness of the identified needs of low-income populations to stretch their income.   |

## 4. HOUSING

### Direct Services:

- a. Homeownership Counseling/Loan Assistance  
Counseling on homeownership for low-income persons, including assistance completing applications for HUD and Farmer's Home Administration home loan programs.
- b. Other Housing Counseling and Landlord/Tenant Advocacy  
Counseling in landlord/tenant relations, as well as assistance in applying for rent subsidies and with default/displacement and relocation situations and fair housing.
- c. Home Repair/Rehabilitation  
Provision of minor home repair and residential rehabilitation services to elderly and other low-income households. Can include home maintenance workshops.
- d. Other Housing Projects  
Includes support for group homes; meeting safety code standards; home construction for low-income families; provision of transportation to housing project participants.
- e. Rent/Mortgage Assistance  
Payments to assist families or individuals in meeting rent or mortgage obligations. Do not include payments for emergency assistance.
- f. Information and Referral  
Information about housing services and referral to existing community programs.

### Non-Direct Service:

- g. Interagency Planning and Coordination  
Cooperation in meeting community housing needs through interagency planning and/or coordination. Can include participation in preparation of applications from local governments for CSBG funds and rural water and waste water facilities.
- h. Community Organization  
Projects to mobilize the resources of communities to identify or meet the housing needs of their low-income families.
- i. Advocacy  
Projects to increase local awareness of the identified housing needs of low-income groups.

## 5. EMERGENCY SERVICES

### Direct Services:

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>a. Emergency Energy Support</li> </ul>  | <p>Use of CSBG resources to amplify or supplement either the crisis assistance or fuel payments aspects of any home energy programs that are run by local CSBG operators. Also, any CSBG resources used to make emergency energy payments, energy related repairs, energy related advocacy and/or crisis interventions, especially with energy suppliers.</p> |
| <ul style="list-style-type: none"> <li>b. Crisis Intervention</li> </ul>   | <p>Intervention in emergencies resulting from child, spouse, alcohol or drug abuse. Includes temporary shelter for battered women. Can also include mediation in cases of utility shut-offs, or in cases where loss of benefits from programs such as AFDC or Food Stamps should cause family emergencies.</p>  |
| <ul style="list-style-type: none"> <li>c. Donated Goods/Services</li> </ul>  | <p>Donations of money, food, clothing, furniture, wood and other fuels, and professional services to help families and individuals meet one-time emergencies or recover from disasters. Primarily includes costs of mobilizing, storing and distributing donations.</p>   |
| <ul style="list-style-type: none"> <li>d. Homeless Aid</li> </ul>  | <p>Temporary shelter and/or food programs for the homeless. Can include other help, such as clothing, medical care and shelter construction.</p>  |
| <ul style="list-style-type: none"> <li>e. Emergency Rent or Mortgage Assistance</li> </ul>   | <p>Payments to assist families or individuals in meeting Rent or Mortgage in order to prevent eviction or foreclosure.</p>  |
| <ul style="list-style-type: none"> <li>f. Emergency Home Repair</li> </ul>   | <p>Payments/Services to assist families or individuals in emergency repairs in order to maintain safe, affordable housing.</p>  |
| <ul style="list-style-type: none"> <li>g. Emergency Medical Care</li> <li>h. Emergency Disaster Relief</li> <li>i. Emergency Clothing</li> </ul> | <p>Payments to assist families or individuals with emergency medical care.<br/>           Payments/Services to assist families or individuals in basic needs following a disaster.<br/>           Payments/Services to assist families or individual in meeting emergency needs for clothing.</p>   |
| <ul style="list-style-type: none"> <li>j. Emergency Transportation</li> </ul>  | <p>Payments/Services to assist families or individuals in meeting emergency needs for transportation (includes auto repair/fuel).</p>   |
| <ul style="list-style-type: none"> <li>k. Emergency Legal Assistance</li> </ul>  | <p>Payments/Services to assist families or individuals with legal assistance.</p>   |
| <ul style="list-style-type: none"> <li>l. Emergency food</li> <li>m. Other Emergency Services</li> <li>n. Information and referral</li> </ul>    | <p>Payments/Services to assist families or individuals in meeting emergency needs for food.<br/>           Can include crisis "Hot Lines", etc.<br/>           Information about emergency and disaster relief services, and referrals to existing community programs.</p>  |

### Non-Direct Service:

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>o. Interagency Planning and Coordination</li> </ul> | <p>Cooperation in meeting community emergency or disaster relief needs through interagency planning and/or coordination.</p>        |
| <ul style="list-style-type: none"> <li>p. Community Organization</li> </ul>                | <p>Projects to mobilize the resources of communities to meet the emergency or disaster relief needs of their low-income groups.</p> |
| <ul style="list-style-type: none"> <li>q. Advocacy</li> </ul>                              | <p>Projects to increase the awareness of the identified emergency or disaster relief needs of low-income groups.</p>                |

---

## 6. NUTRITION

### Direct Services:

- a. Food Pantries  
Organization or operation of community distribution outlets of donated foodstuff, such as dented canned goods and over-stocked produce to low-income persons.
- b. Hot Meals  
Preparation and service of hot breakfasts, lunches or dinners to the poor whether children, adults or the elderly. Includes congregate or home-delivered meals.
- c. Garden Projects  
Assistance with neighborhood or community gardens to improve the diets of low-income families.
- d. Nutrition Education  
Comprehensive counseling sustained counseling or education program to individuals or groups about nutrition, diet and food preparation. May include nutrition assessment.
- e. Other Nutrition Projects  
Preparation of food baskets for the poor; assistance to regional food banks that support local food pantries; use of CSBG resources to amplify or supplement the Women, Infant and Children (WIC) program; summer feeding programs for children; provision of transportation to nutrition project participants; etc.
- f. Information and Referral  
Information about nutrition services and referral to community programs.

### Non-Direct Service:

- g. Interagency Planning and Coordination  
Cooperation in preventing starvation and malnutrition through interagency planning and/or coordination locally or statewide.
- h. Community Organization  
Projects to mobilize community resources to meet the nutrition needs of low-income families, such as Thanksgiving basket campaign for the poor.
- i. Advocacy  
Projects to increase local awareness of identified nutritional needs of low-income groups.

## 7. LINKAGES WITH OTHER PROGRAMS

### Direct Services:

- a. Information and Referrals  
Part of a local CSBG agency that fields all inquiries about available services, and makes referrals to community programs. This is the classification for CSBG operators that utilize umbrella I & R units rather than incorporating the function into each program.
- b. Family/Individual Counseling Programs  
A program providing one-to-one sessions with multi-problem individuals or families by certified counselors.
- c. Community Needs Assessment  
Short-term projects or studies undertaken by local or state CSBG operators to identify and prioritize the needs of low-income citizens eligible for CSBG services.
- d. Transportation Projects  
Includes multi-purpose transportation components that convey participants, young and old, to services they need within their communities; the provision of transportation to meet the various needs of the elderly and handicapped, etc.
- e. Elderly Projects  
Includes multi-purpose or miscellaneous project not listed in other subcategories that are primarily for the poor who are elderly. (Employment or hot lunch projects, even if exclusively for the elderly, would be reflected in the Employment and Nutrition categories, respectively.) Can include such projects as support for multi-purpose senior centers; recreation, consumer, health, homemaker, companion and other services for the elderly; information, referral or outreach projects; costs of sponsoring foster Grandparent or R.S.V.P. programs; CSBG resources used to amplify or supplement Older American Act Programs run by local CSBG operators; etc.
- f. Medical Projects  
Includes primary or special medical, dental, mental health, and alcoholism treatment for low-income persons in isolated or neglected neighborhoods. Can include one-shoot screening, diagnosis and treatment projects; visiting nurse services; etc.
- g. Neighborhood/Community Development  
Includes neighborhood and community centers that are multi-purpose satellites for local CSBG operators; community or economic development projects of local CSBG operators; etc.
- h. Summer Youth Recreation  
Project to involve low-income youth in wholesome activities.
- i. Other Linkages Projects  
Includes such miscellaneous projects as full-year youth recreation projects; multi-purpose services for ex-offenders; etc. (this will include any non-CSBG funded programs that do not fall under other service categories, such as non-emergency LIHEAP)

### Non-Direct Service:

- j. Interagency Planning and Coordination  
Activities to cooperate with and participate in the planning and/or coordination of community services for low-income groups, such as support for planner(s) or planning units of generalists that support all CSBG funded services.
- k. Community Organization Projects  
Comprehensive, multi-purpose projects of local CSBG operators to mobilize community resources to meet a range of projects with other offices to increase state-wide awareness of identified needs of low-income populations.
- l. Advocacy Projects

## 8. SELF-SUFFICIENCY

### Direct Services:

- a. Case Management  
A system which helps clients to achieve self-sufficiency through comprehensive education, goal oriented action, and guidance, etc. under the guidance of a trained professional.
- b. Family Support  
Expenditures to pay for participants' child care, transportation, education needs, housing, etc. while they achieve program goals.
- c. Family/Individual Counseling Programs  
Counseling programs developed as part of the overall strategy for achieving self-sufficiency.
- d. Purchase/Grants Assistance  
Purchases/Grants for program participants.
- e. Family Development/Intervention  
This refers to crisis intervention resource mobilization by para-professional Family Stabilization specialists who provide case management and advocacy for families and individuals to promote self-sufficiency and coordinate public and private community resources to meet needs. This includes activities to assist families and individuals in preventing or addressing personal and situational problems by arranging and/or providing short-term assistance, as well as, to assist the family/individual to develop long-range plans to meet multiple needs and emergencies that are preventing self-sufficiency. Service includes outreach, advocacy, informal counseling, follow-up and promoting active client participation in the process.

### f. Information and Referral

Information and Referral Services to assist clients in achieving self-sufficiency

### Non-Direct Services:

- g. Interagency Planning and Coordination  
Activities to cooperate with and participate in the planning and/or coordination of community services for low-income groups, such as support for planner(s) or planning units of generalists that support all CSBG funded services.
- h. Community Organization  
Projects to mobilize community resources to assist low-income families in obtaining self-sufficiency.
- i. Advocacy  
Projects with other offices to promote self-sufficiency in low-income populations.

## 9. HEALTH

**Direct Services:**

- a. Transportation to Medical Services  
Transportation of low-income people to/from medical services.
- b. Medical or Dental Screening  
Expenditures for physicians', dentists', nurses', paramedics' services in assessing medical or dental service needs.
- c. Immunization  
Expenditures in support of immunization programs and/or for providing immunization.
- d. Prevention of Drug Use, Alcoholism  
Funding for programs of education and support of clients for prevention of these health problems.
- e. Treatment of Alcohol/Drug Abuse  
Expenditures related to identification and in or out-patient treatment of these addictions.
- f. Pregnancy Related, Maternal and Infant Health  
Expenditures related to health services for expectant and new mothers and infants. If these services are predominantly nutritional, e.g., education and food, they should continue to be reported under NUTRITION, as should CSBG expenditure which directly support the WIC program. If most of the resources are being spent for non-nutritional screening and services, report them here.
- g. Family Planning Services  
Family planning, counseling, information and/or assistance.
- h. Rural Health Programs  
All programs designed to coordinate/increase all health resources available in rural areas.
- i. Prescription Drugs  
Payments to assist families or individuals with prescription drugs.
- j. Other Primary Health Care  
This portion is for direct primary services (services to eliminate disease, injury, malnutrition, etc., not indirect help like education and prevention) funded by CSBG. Medication, clinic visits, or home health care not covered in a service title above might fit here.
- k. Other Health Programs  
This section is inserted to help identify any important services missed above.
- l. Information and Referral  
Information about health services and referrals for medical services.

**Non-Direct Services:**

- m. Interagency Planning and Coordination  
Cooperation in providing affordable health care services through interagency planning and/or coordination locally or statewide.
- n. Community Organization  
Projects to mobilize community resources to meet the health needs of low-income families, such as free health fairs.
- o. Advocacy  
Projects to increase local awareness of identified health needs of low- income groups.

**Program Activities**

**Agency Name:** ABC Community Action Agency

Service Category	Service Code and Title (See List Below)	Narrative - Agency Description (Briefly describe the program activities at your agency in your own words for each service title you have selected in each program category.)	"Directly" Supported with CSBG Funds		"Non-Directly" Supported with CSBG Funds	Is this Service in Response to the Agency's Community Needs Assessment? (y/n)
			Direct Services (Specific Assistance) (y/n)	Staff Support (y/n)		

**Employment - services to assist low-income families/individuals to secure and retain meaningful employment**

Direct Services						
1						
2						
3						
4						
5						

Non-Direct Services						
1						
2						
3						

- Direct Services**
- a. Job Counseling
  - b. Job Placement / Development
  - c. Summer Youth Jobs
  - d. Skills training
  - e. Other Employment Services
  - f. Employment Supports
  - g. Information and Referral
- Non-Direct Services**
- h. Job Planning and Coordination
  - i. Community Organization
  - j. Advocacy

**Program Activities**

Agency Name: ABC Community Action Agency						
Service Category	Service Code and Title (See List Below)	Narrative - Agency Description (Briefly describe the program activities at your agency, in your own words, for each service title you have selected in each program category.)	"Directly" Supported with CSBG Funds		"Non-Directly" Supported with CSBG Funds	
			Direct Services (Specific Assistance) (y/n)	Staff Support (y/n)	General Operating Costs (y/n)	Is this Service in Response to the Agency's Community Needs Assessment? (y/n)
<b>Education - activities for individuals to attain adequate education</b>						
<b>Direct Services</b>						
1						
2						
3						
4						
5						
<b>Non-Direct Services</b>						
1						
2						
3						

- Direct Services**
- a. Counseling and Guidance
  - b. Public Education/Information
  - c. Child Care and Child Development
  - d. Adult Basic Education or GED instruction
  - e. Other Instruction
  - f. Other Education Projects
  - g. Information and Referral
- Non-Direct Services**
- h. Interagency or Statewide Planning and Coordination
  - i. Other Community Organization
  - j. Advocacy

**Program Activities**

<b>Agency Name:</b> ABC Community Action Agency		<b>Objectives and Activities</b>			
<b>Service Category</b>	<b>Service Code and Title</b> (See List Below)	<b>Narrative - Agency Description</b> (Briefly describe the program activities at your agency, in your own words, for each service title you have selected in each program category.)	<b>"Directly" Supported with CSBG Funds</b>		<b>"Non-Directly" Supported with CSBG Funds</b>
			<b>Direct Services</b> (Specific Assistance) (y/n)	<b>Staff Support</b> (y/n)	<b>General Operating Costs</b> (y/n)
					<b>Is this Service in Response to the Agency's Community Needs Assessment?</b> (y/n)

**Income Management- activities to enable families/individuals make better use of available income.**

<b>Direct Services</b>					
1					
2					
3					
4					
5					
<b>Non-Direct Services</b>					
1					
2					
3					

<b>Direct Services</b>					
a. Household Financial Counseling					
b. Income Tax counseling					
c. Energy Conservation					
d. Other Projects					
e. Information and Referral					
<b>Non-Direct Services</b>					
f. Interagency or Statewide Planning and Coordination					
g. Community Organization					
h. Advocacy					



Program Activities						
Agency Name: ABC Community Action Agency						
Objectives and Activities						
Service Category	Service Code and Title (See List Below)	Narrative - Agency Description (Briefly describe the program activities at your agency in your own words for each service title you have selected in each program category.)	"Directly" Supported with CSBG Funds		"Non-Directly" Supported with CSBG Funds General Operating Costs (y/n)	Is this Service in Agency's Community Needs Assessment? (y/n)
			Direct Services (Specific Assistance) (y/n)	Staff Support (y/n)		
<b>Emergency Services - activities to meet immediate and urgent family and individual needs</b>						
<b>Direct Services</b>						
1						
2						
3						
4						
5						
<b>Non-Direct Services</b>						
1						
2						
3						
<b>Direct Services</b>	a. Emergency Energy Support b. Crisis Intervention c. Donated Goods/Services d. Homeless Aid e. Emergency Rent or Mortgage Assistance f. Emergency Home Repair g. Emergency Medical Care h. Emergency Disaster Relief i. Emergency Clothing					
<b>Non-Direct Services</b>	j. Emergency Transportation k. Emergency Legal Assistance l. Emergency Food m. Other Emergency Services n. Information and Referral o. Interagency Planning and Coordination p. Community Organization q. Advocacy					

Program Activities					
Agency Name: ABC Community Action Agency					
Objectives and Activities					
Service Category	Service Code and Title (See List Below)	Narrative - Agency Description (Briefly describe the program activities at your agency, in your own words, for each service title you have selected in each program category.)	"Directly" Supported with CSBG Funds		"Non-Directly" Supported with CSBG Funds General Operating Costs (y/n)
			Direct Services (Specific Assistance) (y/n)	Staff Support (y/n)	
Is this Service in Agency's Community Needs Assessment? (y/n)					
<b>Nutrition - to counteract conditions of malnutrition and starvation among low-income individuals</b>					
Direct Services					
1					
2					
3					
4					
5					
Non-Direct Services					
1					
2					
3					

- Direct Services**
- a. Food Pantries
  - b. Hot Meals
  - c. Garden Projects
  - d. Nutrition Education
  - e. Other Nutrition Projects
  - f. Information and Referral
- Non-Direct Services**
- g. Interagency Planning and Coordination
  - h. Community Organization
  - i. Advocacy

**Program Activities**

**Agency Name:** ABC Community Action Agency

Service Category	Service Code and Title (See List Below)	Narrative - Agency Description (Briefly describe the program activities at your agency, in your own words, for each service title you have selected in each program category.)	"Directly" Supported with CSBG Funds		"Non-Directly" Supported with CSBG Funds General Operating Costs (y/n)	Is this Service in Response to the Agency's Community Needs Assessment? (y/n)
			Direct Services (Specific Assistance) (y/n)	Staff Support (y/n)		

**Linkages With Other Entities To Fill Identified Gaps In Services**  
(this will include any non-CSBG funded programs that do not fall under other service categories, such as non-emergency LIHEAP)

Direct Services	1					
	2					
	3					
	4					
	5					

Non-Direct Services	1					
	2					
	3					

- Direct Services**
- a. Information and Referrals
  - b. Family/Individual Counseling Programs
  - c. Community Needs Assessment
  - d. Transportation Projects
  - e. Elderly Projects
  - f. Medical Projects
  - g. Neighborhood/Community Development
  - h. Summer Youth Recreation
  - i. Other Linkages Projects
- Non-Direct Services**
- j. Interagency Planning and Coordination
  - k. Community Organization
  - l. Advocacy

Program Activities					
Agency Name: ABC Community Action Agency					
Objectives and Activities					
Service Category	Service Code and Title (See List Below)	Narrative - Agency Description (Briefly describe the program activities at your agency, in your own words, for each service title you have selected in each program category.)	"Directly" Supported with CSBG Funds		"Non-Directly" Supported with CSBG Funds
			Direct Services (Specific Assistance) (y/n)	Staff Support (y/n)	
			General Operating Costs (y/n)	Is this Service in Response to the Agency's Community Needs Assessment? (y/n)	
<b>Self-Sufficiency - activities to remove obstacles and solve problems that block the achievement of self-sufficiency</b>					
<b>Direct Services</b>					
1					
2					
3					
4					
5					
<b>Non-Direct Services</b>					
1					
2					
3					

- |  |  |
|--|--|
| <p><b>Direct Services</b></p> <ul style="list-style-type: none"> <li>a. Case Management</li> <li>b. Family Support</li> <li>c. Family/Individual Counseling Programs</li> <li>d. Purchase/Grants Assistance</li> <li>e. Family Development /Intervention</li> <li>f. Information and Referral</li> </ul> | <p><b>Non-Direct Services</b></p> <ul style="list-style-type: none"> <li>g. Interagency Planning and Coordination</li> <li>h. Community Organization</li> <li>i. Advocacy</li> </ul> |
|--|--|

**ADECA/CED/CSBG Unit**

Planned Expenditure Amount \$ -

**Program Activities**

**Agency Name:** ABC Community Action Agency

**Objectives and Activities**

Service Category	Service Code and Title (See List Below)	Narrative - Agency Description (Briefly describe the program activities at your agency in your own words for each service title you have selected in each program category.)	"Directly" Supported with CSBG Funds		"Non-Directly" Supported with CSBG Funds General Operating Costs (y/n)	Is this Service in Response to the Agency's Community Needs Assessment? (y/n)
			Direct Services (Specific Assistance) (y/n)	Staff Support (y/n)		
<b>Health</b>						
<b>Direct Services</b>						
1						
2						
3						
4						
5						
<b>Non-Direct Services</b>						
1						
2						
3						

**Direct Services**

- a. Transportation to Medical Services
- b. Medical or Dental Screening
- c. Immunization
- d. Prevention of Drug Use, Alcoholism
- e. Treatment of Alcohol/Drug Abuse
- f. Pregnancy Related, Maternal and Infant Health
- g. Family Planning Services
- h. Rural Health Programs

**Non-Direct Services**

- i. Prescription Drugs
- j. Other Primary Health Care
- k. Other Health Programs
- l. Information and Referral
- m. Interagency Planning and Coordination
- n. Community Organization
- o. Advocacy

AGENCY: ABC Community Action Agency

Answer questions below based on programs described in the program activities worksheets.

1. How will program activities for employment enable the families/individuals to secure and maintain meaningful employment?

---

---

---

---

---

---

---

---

---

---

2. How will program activities for education enable individuals to attain adequate education?

---

---

---

---

---

---

---

---

---

---

3. How will program activities for income management enable families/individuals to make better use of available income?

---

---

---

---

---

---

---

---

---

---

4. How will program activities for housing enable families/individuals to obtain and maintain adequate housing and a suitable living environment?

---

---

---

---

---

---

---

---

---

---

---

---

---

5. How will program activities for emergency services enable families/individuals to meet immediate and urgent needs?

---

---

---

---

---

---

---

---

---

---

---

---

6. How will program activities for nutrition enable families/individuals to counteract conditions of mal-nutrition and starvation?

---

---

---

---

---

---

---

---

---

---

---

---

7. How will program activities for self-sufficiency remove obstacles and solve problems that block the achievement of self-sufficiency?

---

---

---

---

---

---

---

---

---

---

---

---

## CERTIFICATION REGARDING 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.

Board Chairperson

Date

ABC Community Action Agency

Agency Name

**Form with original signature must be sent to ADECA.**

## SUB-GRANTEE REFUNDING CERTIFICATION

NAME OF SUB-GRANTEE <p style="text-align: center;"><b>ABC Community Action Agency</b></p>	DATE SUBMITTED
--	----------------

The following listed documents were previously filed with the ADECA CSBG Unit. **Please enter date of last revision**. If changes have been made, please submit revised document to CSBG Unit. If no changes, DO NOT RE-SUBMIT document.

	DOCUMENT	Date of last revision
A.	Articles of Incorporation	
B.	By-Laws	
C.	Inventory of Property (All CSBG Funds)	
D.	Personnel Policy and Procedures	
E.	Fiscal/Procurement Policies and Procedures	
F.	Board Roster	
G.	Current Fidelity Bond	
H.	Budget	

<b>CERTIFICATION</b>	
We hereby CERTIFY that to the best of our knowledge and belief the information shown on this form and the documents submitted to ADECA, accurately represent the status of the above-named sub-grantee as of the date of this certification.	
NAME OF EXECUTIVE DIRECTOR	NAME OF BOARD CHAIRPERSON

\_\_\_\_\_  
 Executive Director Signature

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 CSBG Program Manager Signature

\_\_\_\_\_  
 Board Chairperson Signature

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 Date

**Form with original signature must be sent to ADECA.**

## **Community Services Block Grant Program**

### **Community Action Agency Programmatic Assurances**

As part of the annual application (Work Plan) required by Section 676 of the Community Services Block Grant Act, as amended, (42 U.S.C. 9901 et seq.) (The Act), the Board Chairperson of the Community Action Agency hereby, certifies that the (Insert Agency Name Here) herein referred to as Community Action Agency (CAA), agrees to the Assurances in Section 676 of the Act.

#### **Programmatic Assurances**

(1) Funds made available through the 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 part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farm workers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals to:

(i) to remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency 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 communities involved, which may include carrying out 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 family and individual needs; and

(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;

(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; and

(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);

(2) Provide information to the State, containing—

- (A) a description of the service delivery system, for services provided or coordinated with funds made available through grants made under section 675C(a), targeted to low-income individuals and families in communities within the State;
- (B) 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;
- (C) a description of how funds made available through grants made under section 675C(a) will be coordinated with other public and private resources; and
- (D) a description of how the local entity will use the funds 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 effective parenting;

(3) an Assurance that the CAA 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;

(4) an Assurance that CAA will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services, and a description of how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 101 of such Act, in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998;

(5) an Assurance that the CAA 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;

(6) an Assurance that the CAA will permit and cooperate with Federal investigations undertaken in accordance with section 678D;

(7) an Assurance that the CAA 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;

(8) an Assurance that the CAA will 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;

(9) an Assurance that the CAA will submit to the State, as a condition to receipt of funding, 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 (676(b)(11));

(10) an Assurance that the CAA will 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 a description of outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization; and

(11) information describing how the CAA will carry out the assurances[676(b)(13)]

(12) By signing and submitting these assurances the CAA certifies that it will comply with the requirements of the Act.

The CAA also certifies the following:

(1) To provide assurance that cost and accounting standards of the Office of Management and Budget (OMB Circular A-110 and A-122) shall apply to a recipient of community services block grant program funds.

(2) To comply with the requirements of Public Law 103-227, Part C Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994, which requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 if the services are funded by a Federal grant, contract, loan or loan guarantee. The CAA further agrees that it will require the language of this certification be included in any subawards, which contain provisions for children's services and that all subgrantees shall certify accordingly.

\_\_\_\_\_  
Board Chairperson

\_\_\_\_\_  
Date

**ABC Community Action Agency**  
Agency Name

**Form with original signature must be sent to ADECA.**

## **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 Exclusion-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 it 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 98.4, 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 principles:
  - (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, lowered 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, [[Page 33043]] 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 title “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 5 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 an 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.

\_\_\_\_\_  
Board Chairperson

\_\_\_\_\_  
Date

**ABC Community Action Agency**

Agency Name

**Form with original signature must be sent to ADECA.**

## CERTIFICATION REGARDING 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 not 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 ten 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).

(h) 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)

---

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]

---

Board Chairperson

---

Date

ABC Community Action Agency  
Agency Name

**Form with original signature must be sent to ADECA.**

## **CERTIFICATION REGARDING ENVIRONMENTAL TOBACCO SMOKE**

The Pro-Children Act of 2001, 42 U.S.C. 7181 through 7184, imposes restrictions on smoking in facilities where Federally-funded children's services are provided. HHS grants are subject to these requirements only if they meet the Act's specified coverage. The Act specifies that smoking is prohibited in any indoor facility (owned, leased, or contracted for) used for the routine or regular provision of kindergarten, elementary, or secondary education or library services to children under the age of 18. In addition, smoking is prohibited in any indoor facility or portion of a facility (owned, leased, or contracted for) used for the routine or regular provision of federally funded health care, day care, or early childhood development, including Head Start services to children under the age of 18.

The statutory prohibition also applies if such facilities are constructed, operated, or maintained with Federal funds. The statute does not apply to children's services provided in private residences, facilities funded solely by Medicare or Medicaid funds, portions of facilities used for inpatient drug or alcohol treatment, or facilities where WIC coupons are redeemed. Failure to comply with the provisions of the law may result in the imposition of a civil monetary penalty of up to \$1,000 per violation and/or the imposition of an administrative compliance order on the responsible entity.

\_\_\_\_\_  
Board Chairperson

\_\_\_\_\_  
Date

**ABC Community Action Agency**

Agency Name

**Form with original signature must be sent to ADECA.**