



Community Services Block Grant (CSBG) 2016 State Plan and Application

SECTION 1 State Lead Agency

- 1.1. Provide the following information in relation to the lead agency designated to administer CSBG in the State, as required by Section 676(a) of the CSBG Act.**

1.1a. Lead agency

The designation and Statutory Authority for Oregon Housing and Community Services Department to act as the Lead Agency to administer and appropriate funds in the CSBG program is referenced in the Oregon Revised Statutes (ORS) Chapter 458.505. Section 676(a) of the Community Services Block Grant Act requires the Chief Executive of each State designate an appropriate State agency to act as the lead agency for administration of the Community Services Block Grant.

Oregon Housing and Community Services (OHCS) has been designated as the lead agency in Oregon for the administration of the Community Services Block Grant. Margaret Van Vliet, Director of OHCS, is the state official designated to sign assurances and receive the grant award.

1.1b. Cabinet or administrative department of this lead agency

- Community Services Department
- Human Services Department
- Social Services Department
- Governor's Office
- Community Affairs Department
- Other, describe: Low-Income Housing, Finance and Anti-Poverty Services

1.1c. Division, bureau, or office of the CSBG authorized official

Oregon Housing and Community Services – Housing Stabilization Division.

1.1d-1.1l. Authorized official of the lead agency

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Housing Stabilization Division

Oregon Housing and Community Services

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1.2. Provide the following information in relation to the designated State CSBG point of contact.

1.2a-1.2j.

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Agency Website: www.oregon.gov/ohcs

1.3. Designation Letter

See Appendix – Item A: Designation Letter.

SECTION 2

State Legislation and Regulation

- 2.1. CSBG State Legislation:** Does the State have a statute authorizing CSBG? Yes No
- 2.2. CSBG State Regulation:** Does the State have regulations for CSBG? Yes No
- 2.3. If yes was selected in item 2.1 or 2.2, attach a copy (or copies) of legislation and/or regulations or provide a hyperlink(s), as appropriate.**
- <http://www.oregonlaws.org/ors/458.505>
- 2.4. State Authority: Select a response for each question about the State statute and/or regulations authorizing CSBG:**
- 2.4a.** Did the State legislature enact authorizing legislation, or amendments to an existing authorizing statute, last year? Yes No
- 2.4b.** Did the State establish or amend regulations for CSBG last year? Yes No
- 2.4c.** Does the State statutory or regulatory authority designate the bureau, division, or office in the State government that is to be the State administering agency? Yes No

SECTION 3

State Plan Development and Statewide Goals

- 3.1. CSBG Lead Agency Mission and Responsibilities: Briefly describe the mission and responsibilities of the State agency that serves as the CSBG lead agency.**

OHCS is the State's housing finance agency and homeless services program administrator. The Department provides financial and program support to develop and preserve opportunities for quality, affordable housing for Oregonians of lower and moderate income, and administers federal and state antipoverty, homeless and energy assistance programs.

The current agency was created in 1991, when the legislature merged the Oregon Housing Agency with the Department of Human Resources State Community Services. The coordination between housing and services creates a continuum of programs that can assist and empower lower-income individuals and families in their efforts to become self-sufficient. OHCS also assists in the financing of single-family homes, the new construction or rehabilitation of multifamily, affordable housing developments, as well as grants and tax credits to promote affordable housing.

In 2011, under the leadership of Director Margaret Van Vliet, OHCS began its first stage of transformation and analysis to further enhance the agency's ability to:

- Set and implement policy in transparent ways

- Incorporate meaningful input from partners
- Have clear decision-making processes
- Become a lean, high-performing agency accountable for results
- Better serve Oregon’s most vulnerable citizens

To lay the groundwork to achieve these goals, OHCS leadership implemented a planning process inclusive of a series of discussions with both agency staff and community stakeholders. Informed by the internal and external input and information received within the 2013 transition planning effort, OHCS leadership updated the agency’s vision, mission and values, and set the framework for a strategic and operational plan that will guide agency policy and activities through the 2015-17 biennium.

Our Vision: All Oregonians have the opportunity to pursue prosperity and live free from poverty

Our Mission: We provide stable and affordable housing and engage leaders to develop integrated statewide policy that addresses poverty and provides opportunity for Oregonians.

Our Core Values: – Collaboration – Compassion – Dedication – Equity – Integrity – Leadership

Value to Oregon Prosperity: We bring statewide clarity and focus to deliver housing stabilization.

Oregon Housing and Community Services administers multiple programs for low income households that provide a broad array of assistance and services including:

- Community Capacity-Building
- Energy Bill & Weatherization Assistance
- Housing Foreclosure Prevention and Counselor Mediation Services
- Affordable Multifamily Housing Financing through Grants, Tax Credits, Loans and Bond Financing
- Homeless Services
- Homeownership Resources
- Housing Choice Landlord Financial Assistance
- Rental Housing Assistance
- Section 8 Project-Based Assistance

3.2. State Plan Goals: Describe the State’s CSBG-specific goals for State administration of CSBG under this State Plan. Instructional Note: For examples of “goals,” see State Accountability Measure. Note: This information is associated with State Accountability Measure 1Sa(i): The State plan includes a State-wide vision with specific goals for meeting the intent and purpose of CSBG, and indicates how local Community Action Plans link to the vision and goals.

Oregon Housing and Community Services continues to collaborate with community stakeholders to broaden and improve anti-poverty services in Oregon communities. In

collaboration with the state association, Community Action Partnership of Oregon and the eighteen community action agencies, OHCS has identified two main goals to focus on the coming year:

1. To increase utilization of research and evidence-based programs, policies and performance outcomes to ensure all Oregonians have access to effective programs designed to transition people out of poverty.

OHCS has partnered with the state association, CAPO, to research and identify potential performance outcomes for community action agencies in Oregon.

In partnership with Oregon State University, and regional community action partners (Washington, Idaho and Alaska), CAPO has developed an initial Theory of Change, designed to help community action agencies determine shared goals.

The OSU Indicators Project aims to:

- Demonstrate the impact of community action agencies on stabilizing and equipping low-income Oregonians to exit poverty
- To provide local agencies with the data necessary to adapt, improve or better target programs to reach these intended outcomes.

While the initial first year of the project has focused on research and data collection, OHCS, OSU and CAPO will focus efforts in the next year to capitalize on research results and develop local community performance measures.

2. To reduce fragmentation and increase coordination across programs, funding sources and with our partners to collectively reduce poverty in Oregon.

Internally, OHCS continues to focus on improving coordination across programs and funding sources including alignment of eligibility and program requirements. Where feasible, programs have been consolidated to maintain ease of access and local flexibility in the delivery of poverty services at the community level.

OHCS and the Community Action Partnership of Oregon (CAPO) are devoting resources to improving the collection, analysis and utilization of data through improvement of CSBG required community needs assessments and client/service data collection. In the coming year, OHCS will provide opportunities for agencies to attend workshops and workgroups with expert trainers and community action agency peers, with the goal to:

- Clarify and reaffirm the purpose and need for community needs assessments;
- Broaden the scope of assessments in their community, including engagement of community stakeholders and expanding assessment partners and tools; and

- More effectively utilize assessment findings in agency operations, such as strategic planning and funding applications.

Additionally, OHCS has convened a workgroup that will place a priority focus on reviewing current agency data collection methods to identify opportunities for increased consistency among community action agencies. Identification of opportunities to share data with other poverty service delivery systems will also be explored.

OHCS currently requires all community action agencies to participate in their local, regional or balance of state homeless Continuums of Care where increased coordination and reduction in service duplication are a high priority. Continuums are comprised of a broad base of stakeholders and organizations with which the CAAs jointly participate in the development of coordinated entry and assessment systems, shared performance measures and service standards. The Continuums of Care serve as a model for exploring further opportunities to coordinate and align the delivery of poverty services.

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

3.3a. Analysis of:

- State Performance Indicators and/or National Performance Indicators (NPIs)
- U.S. Census data
- State performance management data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)
- Other data
- Eligible entity community needs assessments
- Eligible entity plans
- Other information from eligible entities, e.g., State required reports

3.3b. Consultation with:

- Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)
- State community action association and regional CSBG T & TA providers
- State partners and/or stakeholders
- National organizations

Other

3.4. Eligible Entity Involvement

3.4a. Describe the specific steps the State took in developing the State Plan to involve the eligible entities. Note: This information is associated with State Accountability Measures 1Sa(ii).

The Community Action Agency Network is legislatively required to advise OHCS on anti-poverty policy, funding and programming. This advice is systematically collected through a variety of means, including participation in the Housing Stabilization Council, State staff attendance of the monthly state association's meetings (Community Action Partnership of Oregon (CAPO)), and various workgroups addressing housing, homeless and poverty-related services.

In addition to these collaborative efforts, OHCS convened CAA Directors from the CAA Network for a monthly CSBG workgroup. This workgroup advised on the development of key components of the state plan and will continue to meet to refine policies and procedures in the areas of:

- CSBG Discretionary Spending
- Training and Technical Assistance Needs
- CSBG Formula Allocations
- Organizational Standards – adoption and implementation
- CSBG Data Collection - consolidation and consistency

In preparation of this state plan, CAPO board members were also provided the opportunity to give feedback in advance of a public hearing. Members were provided materials and time to review and advise on items such as the CSBG Organizational Standards, developed by the Center for Excellence, and the distribution of the projected funding allocations for the next program year.

SECTION 4

CSBG Hearing Requirements

4.1. **Public Inspection:** Describe how the State made this State Plan, or revision(s) to the State Plan, available for public inspection, as required under Section 676(e)(2) of the Act.

The OHCS CSBG 2016 State Plan application was published for viewing on the OHCS website on August 24th, 2015, in anticipation of the August 28th public hearing.

- 4.2. Public Notice/Hearing:** Describe how the State ensured there was sufficient time and statewide distribution of notice of the public hearing(s) to allow the public to comment on the State Plan, as required under 676(a)(2)(B) of the CSBG Act.

A public hearing was held in Salem, Oregon at the office of the Oregon Housing and Community Services on August 28th, 2015, from 10:00am – 11:00am. Notices of the public hearing were published in newspapers The Oregonian, The Medford Mail Tribune, The Salem Statesman Journal and the Pendleton East Oregonian on August 21st. The public comment period was open until 5:00pm, September 10th, 2015.

- 4.3. Public and Legislative Hearings:** Specify the date(s) and location(s) of the public and legislative hearing(s) held by the designated lead agency for this State Plan, as required under Section 676(a)(2)(B) and Section 676(a)(3) of the Act. (If the State has not held a public hearing in the prior fiscal year and/or a legislative hearing in the last three years, provide further detail).

The OHCS Budget, including CSBG, was subject to a legislative hearing on June 18th, 2015.

- 4.4.** Attach supporting documentation or a hyperlink for the public and legislative hearings.

SECTION 5

CSBG Eligible Entities

- 5.1. CSBG Eligible Entities:** In the table below, list each eligible entity in the State, and indicate public or private, the type(s) of entity, and the geographical area served by the entity. (This table should include every CSBG Eligible Entity to which the State plans to allocate 90 percent funds, as indicated in the table in item 7.2. Do not include entities that only receive remainder/discretionary funds from the State or tribes/tribal organizations that receive direct funding from OCS under Section 677 of the CSBG Act.)

1. ACCESS

Private Community Action Agency
Service Area: Jackson County

2. Community Action Organization (CAO)

Private Community Action Agency
Service Area: Washington County

3. Community Action Program of East Central Oregon (CAPECO)

Private Community Action Agency
Service Area: Gilliam, Morrow, Umatilla and Wheeler Counties

4. Community Action Team (CAO)

Private Community Action Agency
Service Area: Clatsop, Columbia and Tillamook Counties

5. Community Connection of Northeast Oregon (CCNO)

Private Community Action Agency

Service Area: Baker, Grant, Union and Wallowa Counties

6. Clackamas County Social Services Division (CCSSD)

Local Government Community Action Agency

Service Area: Clackamas County

7. Community Services Consortium (CSC)

Local Government Community Action Agency

Service Area: Benton, Lincoln and Linn Counties

8. Community in Action (CinA)

Private Community Action Agency

Service Area: Harney and Malheur Counties

9. Klamath Lake Community Action Services (KLCAS)

Private Community Action Agency

Service area: Klamath and Lake Counties

10. Lane County

Local Government Community Action Agency

Service Area: Lane County

11. Mid-Columbia Community Action Council (MCCAC)

Private Community Action Agency

Service Area: Hood River, Sherman and Wasco Counties

12. Multnomah County Department of County Human Services (MultCo)

Local Government Community Action Agency

Service Area: Multnomah County

13. Mid-Willamette Valley Community Action Agency (MWVCAA)

Private Community Action Agency

Service Area: Marion and Polk Counties

14. NeighborImpact

Private Community Action Agency

Service Area: Crook, Deschutes and Jefferson Counties

15. Oregon Human Development Corporation (OHDC)

Private Statewide Farm Worker Organization

16. Oregon Coast Community Action Agency (ORCCA)

Private Community Action Agency

Service Area: Coos and Curry Counties

17. United Community Action Network (UCAN)

Private Community Action Agency

Service Area: Douglas and Josephine Counties

18. Yamhill Community Action Partnership (YCAP)

Private Community Action Agency

Service Area: Yamhill County

5.2. Total number of CSBG eligible entities: 18

5.3. Changes to Eligible Entities List: Has the list of eligible entities under item 5.1 changed since the State's last State Plan submission? If yes, briefly describe the changes. Yes No

Instructional Note: Limited Purpose Agency refers to an eligible entity that was designated as a limited purpose agency under title II of the Economic Opportunity Act of 1964 for fiscal year 1981, that served the general purposes of a community action agency under title II of the Economic Opportunity Act, that did not lose its designation as a limited purpose agency under title II of the Economic Opportunity Act as a result of failure to comply with that Act and that has not lost its designation as an eligible entity under the CSBG Act.

Instructional Note: 90 percent funds are the funds a State provides to eligible entities to carry out the purposes of the CSBG Act, as described under Section 675C of the CSBG Act. A State must provide "no less than 90 percent" of their CSBG allocation, under Section 675B, to the eligible entities.

SECTION 6

Organizational Standards for Eligible Entities

6.1. Choice of Standards: Check the box that applies. If using alternative standards, a) attach the complete list of alternative organizational standards, b) describe the reasons for using alternative standards, and c) describe how the standards are at least as rigorous as the COE-developed standards.

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

The State will use an alternative set of organizational standards

6.2. If the State is using the COE-developed organizational standards, does the State propose making a minor modification to the standards, as described in IM 138? Yes No

6.2a. If yes was selected in item 6.2, describe the State's proposed minor modification to the COE-developed organizational standards, and provide a rationale.

6.3. How will/has the State officially adopt(ed) organizational standards for eligible entities in the State in a manner consistent with the State’s administrative procedures act? If “Other” is selected, provide a timeline and additional information, as necessary.

- Regulation
- Policy
- Contracts with eligible entities
- Other, describe:

OHCS has begun the initial process of review and feedback of the Organizational Standards with the state association and the community action network. In anticipation of the formal approval of the standards, OHCS has convened a CSBG Workgroup which will be coordinated by OHCS staff and comprised of representatives from the Oregon community action network.

CSBG Workgroup Members:

- Executive Director, ACCESS
- Executive Director, MCACC
- Executive Director, CAO
- Executive Director, KLCAS
- Executive Director, UCAN
- Program Staff, CAO

In addition to the above, OHCS Staff members will participate, including: the Safety Net Compliance Officer, CSBG Program Coordinator, Departmental Policy and Operations Analyst and Assistant Director of Housing Stabilization.

A priority task of the CSBG Workgroup will be to review the Implementation Framework recommended for the Organizational Standards and submitted to the Office of Community Services.

Subsequent to the review, the CSBG Workgroup will make recommendations for policies and procedures that will be addressed in the 2017 CSBG State Plan and effective July 1, 2017, in accordance with the funding year.

Approximate Timeline:

July 2015 - December 2015: Review and Discussion: draft policies and procedures

September 2015 - December 2015: CAA Network Feedback

September 2015 – March 2016: Trainings, Workshops and Technical Assistance

January 2016 – March 2016: Goal - 50% of agencies have completed Initial Self-Assessments with State Verification

April 2016 – June 2016: Goal - Remaining agencies have completed Initial Self-Assessments with State Verification

July 2016: Signed agreements with agencies to implement Organizational Standards

In addition to Oregon’s participation in the pilot project for Organizational Standards, members of the CSBG Workgroup were active in the development of the standards. Both OHCS and the network will work collaboratively to ensure best practices for adoption and implementation are met:

- In adopting the Standards, follow state administrative law for adoption of rules and regulations, which may include notice and comment periods and/or hearings, and in some cases, approval by the state legislature;
- Include Organizational Standards in the State Plan submitted to the Office of Community Services;
- Notify OCS in writing if the State intends to modify any Organizational Standard;
- Modify and finalize monitoring tools that will be used to assess CSBG-Eligible Entity performance so that they incorporate Organizational Standards and offer the opportunity for CSBG-Eligible Entity feedback on the tools;
- Develop revised CSBG contracts in coordination with State CSBG Lead Agency legal counsel;
- Train State CSBG Lead Agency staff, including monitors, on the Standards.

Additionally, OHCS will follow the Oregon Revised Statute 183.337 for Procedure for Agency Adoption of Federal Rules:

ORS 183.337¹ Procedure for agency adoption of federal rules

(1) Notwithstanding ORS 183.335, when an agency is required to adopt rules or regulations promulgated by an agency of the federal government and the agency has no authority to alter or amend the content or language of those rules or regulations prior

to their adoption, the agency may adopt those rules or regulations under the procedure prescribed in this section.

(2) Prior to the adoption of a federal rule or regulation under subsection (1) of this section, the agency shall give notice of the adoption of the rule or regulation, the effective date of the rule or regulation in this state and the subject matter of the rule or regulation in the manner established in ORS 183.335.

(3) After giving notice the agency may adopt the rule or regulation by filing a copy with the Secretary of State in compliance with ORS 183.355 (*Filing and taking effect of rules*). The agency is not required to conduct a public hearing concerning the adoption of the rule or regulation.

(4) Nothing in this section authorizes an agency to amend federal rules or regulations or adopt rules in accordance with federal requirements without giving an opportunity for hearing as required by ORS 183.335. [1979 c.593 §15]

6.4. How will the State assess eligible entities against organizational standards, as described in IM 138?

- Peer-to-peer review (with validation by the State or State-authorized third party)
- Self-assessment (with validation by the State or State-authorized third party)
- Self-assessment/peer review with State risk analysis
- State-authorized third party validation
- Regular, on-site CSBG monitoring
- Other

6.4a. Describe the assessment process.

The CSBG Workgroup will assist OHSC in determining the procedures for assessment of Organizational Standards. The workgroup will review the best method for assessment, considering self-assessments with validation by the State, self-assessment with State risk analysis and assessment as part of the regular, on-site monitoring. This process will be finalized prior to, and presented in, the 2017 CSBG State Plan.

Currently, agencies are monitored in a variety of ways:

- Master Grant Agreement Funding Application and Review
- Desktop Monitoring
- Site Visits within every 3 years

Frequency of monitoring within the 3-year requirement is determined by several factors, including risk assessment, quality improvement plan follow-up schedule and additional factors set forth by the compliance officer. As part of the review for implementation, the OHCS CSBG compliance officer will assist the workgroup to incorporate the assessment process into the monitoring processes.

6.5. Will the State make exceptions in applying the organizational standards for any eligible entities due to special circumstances or organizational characteristics, as described in IM 138?

Yes No

6.5a. If yes was selected in item 6.5, list the specific eligible entities the State will exempt from meeting organizational standards, and provide a description and a justification for each exemption.

IM 138 addresses exemptions for agencies that are limited purpose or migrant seasonal farmworker organizations. Within Oregon's CAA Network, one eligible entity is a migrant seasonal farmworker organization. The Oregon Human Development Corporation (OHDC) is a non-profit service that assists farmworkers and disadvantaged individuals throughout Oregon through a decentralized service delivery system of seven local service offices throughout the state, as well as one office in Northern Nevada.

Through training and technical assistance, OHCS will work with agencies to meet all organizational standards and assess exceptions that will be required for OHDC but are unable at this time to fully list the required exceptions. Details regarding exceptions will be more fully addressed in the 2017 State Plan application and subsequent to the initial assessment agencies will undergo in 2016.

SECTION 7 State Use of Funds

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

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

- Historic
- Base + Formula

- Formula Alone
- Formula with Variables
- Hold Harmless + Formula
- Other

7.1a. Does the State statutory or regulatory authority specify the terms or formula for allocating the 90 percent funds among eligible entities? Yes No

7.2. Planned Allocation: Specify the planned allocation of 90 percent funds to eligible entities, as described under Section 675C(a) of the CSBG Act.

Planned 2016 CSBG Allocation	
Agency	Funding Amount
ACCESS	\$ 255,149.81
CAO	\$ 372,088.56
CAPECO	\$ 150,000.00
CAT	\$ 150,000.00
CCNO	\$ 150,000.00
CCSSD	\$ 253,290.90
CinA	\$ 150,000.00
CSC	\$ 321,618.35
KLCAS	\$ 150,000.00
LANE	\$ 436,445.11
MCCAC	\$ 150,000.00
MULTCO	\$ 833,466.82
MWVCAA	\$ 477,276.39
NImpact	\$ 248,842.06
ORCCA	\$ 150,000.00
UCAN	\$ 264,987.82
YCAP	\$ 150,000.00
OHDC	\$ 150,000.00

7.3. Distribution Process: Describe the specific steps in the State’s process for distributing 90 percent funds to the eligible entities and include the number of days each step is expected to take; include information about State legislative approval or other types of administrative approval (such as approval by a board or commission).

As the designated lead agency, OHCS receives an award letter from the Department of Health and Human Services (HHS) representing the CSBG Allocation made available under Public Law 112-10. Award letters are received at the OHCS offices in both paper and electronic form.

Once the CSBG Award Letter is received:

- The original award letter goes to the Grants Manager in the Finance Management Department.
- A pdf. version is emailed to the Research Analyst assigned to CSBG.
- Ninety percent is pass-thru funding to the agencies, five percent is discretionary, and five percent is admin for the State.
- The Research Analyst, using the current funding formula, processes the award to determine the allocation for the 18 eligible entities. Administration and program amounts are determined by each agency's CSBG budget. (7 days)
- Once processed, the CSBG program coordinator creates a Notice of Allocation, submits to the Finance department and funds are available to agencies through the OPUS database system. (7 days)

A copy of the award letter and spread sheet of the allocation break-down per agency is electronically filed with all other CSBG documents on the agency's server.

NOA's are not allocated to the eligible entities until January. The grant period on the NOA is January – December. Depending on when the first quarter award is received, the first quarter award may not be issued within 30 days. When the calendar year covers two biennium, unexpended CSBG funds must be de-allocated from the existing biennium and re-allocated to the new biennium. If there are unexpended funds at the end of the calendar year, CSBG funds are extended or rolled from the existing calendar year through March 31st of the new year.

In the event of total award increases or decreases, OHCS has guidelines made in agreement with the CAA network:

- In the event of an increase in funding, all agencies will see an increase in funding.
- In the event of a decrease, all agencies will see a decrease. However, no floor agencies will go below \$150,000 while no formula agencies will see higher than a 10% decrease than the year prior.
- When necessary, discretionary funds may be utilized to mitigate decreases in funding.

At times, the above guidelines do not address all conditions. In this event, OHCS seeks recommendations from the CAA network through the state association, CAPO. In this situation, OHCS may be unable to meet the 30-day timeline however OHSC is expedient in issuing the CSBG funds, once an additional agreement has been met.

7.4. Distribution Timeframe: Does the State plan to make funds available to eligible entities no later than 30 calendar days after OCS distributes the Federal award? Yes No

7.4a. If no, describe State procedures to ensure funds are made available to eligible entities consistently and without interruption. Note: Item 7.4 is associated with State Accountability Measure 2Sa and may pre-populate the State’s annual report form.

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

7.6. What amount of State CSBG funds does the State plan to allocate for administrative activities, under this State Plan? The estimate may be in dollars or a percentage.

Section 675(b)(2) of the Act specifies that no State may use more than the greater of \$55,000, or 5% of its grant or allotment for administrative expenses, including monitoring activities.

OHCS anticipates use of the 5% of administrative funding in the following manner:

Budgeted staff costs:

The administration of the CSBG grant, maintenance of OPUS, (Oregon’s multi-program reporting mechanism), maintenance of Service Point, providing direct support services to partners through a staff help desk for OPUS and Service Point users, program monitoring, training and technical assistance to Community Action Agencies and their sub-grantees, support staff activities in the areas of financial services, administration, and other indirect staff costs.

Staff Development:

Attendance to conferences and training for CSBG Staff directly involved with the Program (may include program coordinator, fiscal staff and monitoring staff and other OHCS staff who directly benefit community action program service delivery).

Budgeted other costs:

Travel, training, equipment, supplies, meeting expenses, printing postage, telephone and other miscellaneous costs associated with the process listed above.

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

Eighteen staff positions are anticipated to be funded in whole or in part with CSBG funds.

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

Two staff full-time equivalent positions are anticipated to be funded with CSBG funds.

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

7.9. Does the State have remainder/discretionary funds? Yes No

If yes was selected, describe how the State plans to use remainder/discretionary funds in the table below. **Note:** This response will link to the corresponding assurance, item 14.2.

Instructional Note: The assurance under 676(b)(2) of the Act (item 14.2 of this State Plan) specifically requires a description of how the State intends to use remainder/discretionary funds to “support innovative community and neighborhood-based initiatives related to the purposes of [the CSBG Act].” Include this description in row “f” of the table below and/or attach the information.

If a funded activity fits under more than one category in the table, allocate the funds among the categories. For example, if the State provides funds under a contract with the State Community Action association to provide training and technical assistance to eligible entities and to create a statewide data system, the funds for that contract should be allocated appropriately between row a and row c. If allocation is not possible, the State may allocate the funds to the main category with which the activity is associated.

Remainder/ Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	2016 FFY (Anticipated / Planned %)
a. Training/technical assistance to eligible entities	Approximately 45%
b. Coordination of State-operated programs and/or local programs	Approximately 20%
c. Statewide coordination and communication among eligible entities	Approximately 20%
d. CAA Fiscal Support	Approximately 15%

7.10. What types of organizations, if any, does the State plan to work with (by grant or contract using remainder/discretionary funds) to carry out some or all of the activities in table 7.9.

- CSBG eligible entities
- Other community-based organizations
- State Community Action association
- Regional CSBG technical assistance provider(s)
- National technical assistance provider(s)

- Individual consultant(s)
- Tribes and Tribal Organizations
- Other
- None (the State will carry out activities directly)

SECTION 8
State Training and Technical Assistance

8.1. Describe the State’s plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan by completing the table below. Add a row for each activity: indicate the timeframe; whether it is training, technical assistance or both; and the topic. (CSBG funding used for this activity is referenced under item 7.9(a), Use of Remainder/Discretionary Funds.)

OHCS Note: Timeline given for trainings is projected and approximate, and may be subject to scheduling changes.

Training and Technical Assistance			
Fiscal Year (FY) Quarter (Q) / Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
Ongoing/Multiple Quarters	Training	ROMA	
Ongoing/Multiple Quarters	Training	Other	Family Development
FY1 - Q4	Training	Fiscal	
Ongoing/Multiple Quarters	Both	Organizational Standards - General	
Y1 - Q4	Training	Other	Self-Sufficiency and Economic Security
Y1 - Q4	Training	Other	Getting On Board: Evidence-Based Programs and Practices
Y1 - Q4	Both	Community Assessment	
Y1 - Q4	Training	Other	Collective Impact: Community Change Strategy

8.1a. the planned budget for the training and technical assistance plan (as indicated in the Remainder/Discretionary Funds table in item 7.9): \$125,450

8.3. Indicate the types of organizations through which the State plans to provide training and/or technical assistance as described in item 8.1, and briefly describe their involvement? (Check all that apply.)

- CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds)

- Other community-based organizations
- State Community Action association
- Regional CSBG technical assistance provider(s)
- National technical assistance provider(s)
- Individual consultant(s)
- Tribes and Tribal Organizations
- Other

SECTION 9

State Linkages and Communication

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

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

- State Low Income Home Energy Assistance Program (LIHEAP) office
- State Weatherization office
- State Temporary Assistance for Needy Families (TANF) office
- State Head Start office
- State public health office
- State education department
- State Workforce Innovation and Opportunity Act (WIOA) agency
- State budget office
- Supplemental Nutrition Assistance Program (SNAP)
- State child welfare office

State housing office

Other

- 9.2. State Linkages and Coordination at the Local Level:** Describe the linkages and coordination at the local level that the State plans to create or maintain with governmental and other social services, especially antipoverty programs, to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by assurances under Sections 676(b)(5) and (b)(6)). Attach additional information as needed. **Note:** This response will link to the corresponding CSBG assurances, items 14.5 and 14.6.

Internal: Homeless and Poverty Linkages

Department of Human Services (Housing Stabilization Program)

The Housing Stabilization Program was created in 1999 to assist households with children who are homeless or at risk of becoming homeless. The program is a partnership between CAAs, Children Adults and Families Division (TANF office) of Oregon Department of Human Services and Oregon Housing and Community Services. The program assists low- and very-low-income homeless or at-risk households with children. The CAA determines eligibility based upon income, homeless or at risk of homelessness status and household composition, legal status and other criteria. Eligible applicants may receive payment for one or more of the following services: shelter costs, medical care costs not covered by another source, costs incurred for necessary support services, such as food, child care, transportation, counseling, education.

External and Statewide Linkages:

Oregon's Continuums of Care (COC)

Oregon has seven Continuums of Care located throughout the state comprised of multiple organizations and stakeholders who are addressing issues of homelessness through collaborative planning and implementation of a coordinated delivery system.

COC membership is diverse and includes such representation as faith-based organizations, business, education, HOPWA, Department of Human Services, Mental Health, Department of Corrections, law enforcement, Veterans' Assistance, community action agencies, nonprofit providers, and homeless/formerly homeless people. As providers of OHCS homeless funded programs, the CAA network plays a critical role in the operations of their regional or balance of state COC including leadership as a COC lead in five of the seven Continuums.

OHCS is currently establishing an on-going process for consultation with the COCs to address three primary areas of work:

- Allocation of resources/funding;
- Development of performance standards and;

- Development of funding, policies and procedures for operating and administering the state’s Homeless Management Information System.

COC consultation creates the opportunity for stronger accountability and collaborative efforts to prevent and reduce homelessness. It also links three separate planning efforts (State 10 Year Homeless Plan, local/regional 10 Year Homeless Plans and State Consolidated Plan) into a coordinated approach to addressing homelessness.

Oregon Business Council

Under guidance of the Oregon Business Plan, OBC directors and other business leaders have been active in this year’s Legislature, joining with community organizations to advocate state policies and investments aimed at reducing poverty in Oregon.

The business community supports Oregon Business Plan recommendations to strengthen education attainment and career skills, build up rural economies where poverty is most severe and enact policies to make the social safety net work and to make work pay.

The latter category of recommendations include redesigning short-term assistance to needy families, improving child care access, making changes in benefits rules and expanding tax credits.

OBC directors have submitted letters of support for bills that would provide seed funding for poverty reduction initiatives in high poverty communities and that would continue and strengthen the Individual Development Account program.

Oregon Health Authority and Department of Human Services

In recognition of the impact of stable housing upon factors that contribute to poverty (poor school and work performance, limited access to employment and health care and family instability), the Oregon Legislature recently passed SB444. This bill requires OHCS to develop a report on housing stabilization programs in consultation with the Oregon Health Authority and Department of Human Services. The report will address issues that include impact of homelessness on individuals, barriers to re-housing and the link between energy cost and housing instability. The collaborative development of this assessment and report will provide valuable data and information that can be utilized to improve coordination between the state’s three primary poverty delivery systems.

9.3. Eligible Entity Linkages and Coordination

9.3a State Assurance of Eligible Entity Linkages and Coordination: Describe how the State will assure that the eligible entities will coordinate and establish linkages to assure the effective delivery of and coordination of CSBG services to low-income people and

communities and avoid duplication of services (as required by the assurance under Section 676(b)(5)). Attach additional information as needed. Note: This response will link to the corresponding CSBG assurance, item 14.5.

The Oregon Community Action Network coordinates with multiple local and statewide partners to establish linkages and maximize their anti-poverty efforts. Oregon CAA's report on linkages annually in the CSBG IS-Survey and provide narrative descriptions of agency efforts and initiatives to establish partnerships and provide long-term solutions to poverty.

Example:

ACCESS: To support ROMA Goal 4, "Partnerships among supporters and providers of service to low-income people are achieved," the agency underwent a 10-month process of consultation with a wide cross-section of community stakeholders. Growing out of a greater focus on children and youth in the community through new partnerships with youth-serving organizations, ACCESS participated in a broad community collaboration of public and private agencies dedicated to developing a collective impact model that would contribute to dramatic improvements in educational attainment of community youth. Two particular foci were developed: early childhood education and high school graduation rates. Overwhelming data showed that the children at highest risk of non-completion of secondary school lived in low-income households. Furthermore, school drop-out rates are significantly higher among students who are homeless. Thus, the emphasis was on improving the conditions for low-income families and their children, beginning with early learning.

- The Educational Service District provided loaned executives and space in which to hold planning meetings, contributed some start-up funding to consultant costs, maintained the fiscal management of the collaborative, and brought many public education partners to the table.
- The Gordon Elwood Foundation provided expertise, the facilitation and convening skills of its executive director, supplies for meetings, and some funding for the consultant.
- On-Track, a local addiction-recovery organization with extensive experience in the foster parent system, contributed a great deal of time and financial resources.
- Youth service organizations like Southern Oregon Head Start, Hearts with a Mission, the Maslow Project, Kids Unlimited, the YMCA, the Family Nurturing Center, and others, attended countless planning sessions and made some financial contributions as well.
- Public agencies involved included Jackson and Josephine County Health & Human Services staff, Department of Mental Health, Oregon Department of Human Services, Department of Corrections, Department of Senior and Disability Services, Oregon Early Learning Council and others.
- Coordinated Care Organizations (providing health services to state Medicaid/Cover Oregon families) and community health centers.

Usage of CSBG Funds by Service Category:

Service Category	2014 CSBG Funds
1. Employment	\$54,023
2. Education	\$170,832
3. Income Management	\$71,850
4. Housing	\$268,513
5. Emergency Services	\$882,337
6. Nutrition	\$537,058
7. Linkages	\$1,125,453
8 Self Sufficiency	\$1,283,240
9. Health	\$23,676
TOTALS	\$4,640,838

9.3b State Assurance of Eligible Entity Linkages to Fill Service Gaps: Describe how the eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations, according to the assurance under Section 676(b)(3)(B) of the CSBG Act. Note: This response will link to the corresponding CSBG assurance, item 14.3b.

Eligible entities are required, during the Master Grant Agreement process, to submit a community needs assessment and state the priority populations their agency will serve. This information allows OHCS to recognize overlap and gaps in services.

- 9.4. Workforce Innovation and Opportunity Act (WIOA) Employment and Training Activities: Does the State intend to include CSBG employment and training activities as part of a WIOA Combined State Plan, as allowed under the Workforce Innovation and Opportunity Act (as required by the assurance under Section 676(b)(5) of the CSBG Act)? Note: This response will link to the corresponding CSBG assurance, item 14.5.**

Yes No

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

- 9.4b. If the State selected “no” under item 9.4, describe the coordination of employment and training activities, as defined in Section 3 of WIOA, by the State and by eligible entities providing activities through the WIOA system.**

OHCS intends to participate in the next WIOA Consolidated Plan effort but is not currently part of this collaboration. After consultation with the Oregon Employment Department and in consideration of the timeline for submission, it was mutually agreed that OHCS would delay participation until the next phase of planning.

The State of Oregon Employment Department offers many programs to assist unemployed and low-income community members.

JOBS Opportunity and Basic Skills (JOBS): serves community members on public assistance. The program aims to help low-income families avoid the need for welfare. JOBS provides job search assistance, work experience, subsidized employment, and high school or GED completion for teen parents and support payments. JOBS services are provided by DHS and a network of local partners that include community colleges, the Employment Department, the business community, faith-based organizations and Community Action Agencies.

WorkSource Oregon provides an extensive online database of resources and skill-building tools to assist job seekers, including special-focus sections such as: Veterans Priority of Service, job seekers of limited English, job seekers with disabilities, youth, ex-offender (reentry) and Trade Act programs. The Oregon Workforce Investment Board oversees committees on communications, manufacturing and youth and education. The Youth and Education Committee advises the board on policy issues dealing with youth,

the emerging workforce and education. These recommended policies coordinate the delivery of services to youth and identify barriers and solutions to the delivery of these services. Welfare to Work programs through the Department of Employment are linked in local services areas through direct partnerships with Community Action Agencies and other partners.

In 2014, community action agencies utilized \$54,023 in CSBG funds to support employment services and \$170,832 to support Education initiatives.

- 9.5. Emergency Energy Crisis Intervention: Describe how the State will assure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to Low-Income Home Energy Assistance) are conducted in each community in the State, as required by the assurance under Section 676(b)(6) of the CSBG Act). Note: This response will link to the corresponding CSBG assurance, item 14.6.**

Community action agencies in Oregon are the primary delivery mechanisms for Oregon Housing and Community Services programs to low-income Oregonians. The history of coordination of the CSBG, LIHEAP, and Weatherization programs has provided a model that we will continue to strengthen. At this time our CAAs also coordinate other low-income grants such as food, childcare assistance and other programs offered through various funders including other state agencies. State statute and Oregon Housing and Community Services policy will have CAAs continue in that role.

- 9.6. State Assurance: Faith-based Organizations, Charitable Groups, Community Organizations: Describe how the State will assure local eligible entities will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations, according to the State's assurance under Section 676(b)(9) of the CSBG Act. Note: this response will link to the corresponding assurance, item 14.9.**

Community action agencies agree to assurances through the Master Grant Agreement process. The agencies are required to submit partnership information annually through the CSBG IS-Survey. Additionally, the community action agency network is the state delivery system for homeless services. In this capacity CAAs are required to participate in their homeless Continuum of Care which is comprised of multiple organizations including faith-based, charitable groups, low income representatives and other community and state organizations.

See Appendix – Item B: Faith-Based Partnerships

- 9.7 Coordination of Eligible Entity 90 Percent Funds with Public/Private Resources: Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act. Note: this response will link to the corresponding assurance, item 14.3c.**

Oregon's eligible entities coordinate with multiple public and private resources to support anti-poverty, homeless and housing services. CSBG funds also support CAA network participation in efforts such as the Hunger Relief Task Force, Health Care for the Homeless, Advisory Committee on Energy, Governor's Task Force on Veterans' Services and other related meetings.

The Oregon community action agencies report annually on their public and private resources in the CSBG IS-Survey. In 2014, the eligible entities received \$37,515,253 in public resources and \$56,297,687 in private resources.

9.8. Coordination among Eligible Entities and State Community Action Association: Describe State activities for supporting coordination among the eligible entities and the State Community Action Association.

OHCS works in close collaboration with the state association, Community Action Partnership of Oregon (CAPO) and annually provides CSBG funds for CAPO operations and statewide services. CAPO's board of directors is comprised of executive directors from the Oregon community action agency network. In addition to being a legislatively-required advisory partner to OHCS, CAPO provides technical and training assistance to the CAA Network, as agreed upon in an annual workplan agreement with OHCS.

Community Action Partnership of Oregon (CAPO)

Community Action Partnership of Oregon (CAPO) is a non-profit association that serves the agencies that serve Oregonians in need. These agencies are Community Action Agencies (CAAs), part of a nationwide poverty-fighting network. CAPO comprises 18 member organizations (17 CAAs and Oregon Human Development Corporation), serving Oregonians in every county in the state.

CAPO's work and goals include:

- Advocating for public policies that serve our members and the low-income population of Oregon
- Raising public awareness of the problems of those struggling with poverty and the good works of local Community Action Agencies by actively promoting the value of the CA Network and its member services and programs
- Building partnerships that advance the Community Action Agencies, the CA Network and those who share common concerns
- Maximizing resources to address the causes and conditions of poverty
- Educating and informing the membership, stakeholders and general public about issues that affect their communities
- Providing timely, relevant and reliable information on vital issues that impact members and stakeholders
- Increasing the capacity and effectiveness of Community Action Agencies through providing the tools, training and support they need to be effective and successful

In addition to mobilizing community action agencies across the state of Oregon, CAPO is the primary technical and training assistance provider utilized by OHSC for the CSBG eligible entities. CAPO hosts a website resource center for CSBG-related topics, advocates on behalf of the community action agencies and regularly sends CSBG-related newsletters to its member network.

CAPO annually provides the following trainings and workshops to the CAA Network:

- ROMA and NPI Targeting
- Family Development
- Fiscal Training
- OMB Circular Training
- Community Needs Assessments 101

9.9 Communication with Eligible Entities and the State Community Action Association: In the table below, describe the State’s plan for communicating with eligible entities, the State Community Action Association, and other partners under this State Plan. Include communication about annual hearings and legislative hearings, as described under Section 4, CSBG Hearing Requirements.

OHCS Protocol for Communications to CAPO and Community Action Agencies:

We believe that the work OHCS and CAPO does together makes Oregon a better place. The more collaboratively our organizations work, and the more efficiently we communicate, the better service we provide to our communities. To that end, we utilize the following “Communication Protocol” between the two organizations in the name of better service to the state.

Services Impacted by This Protocol:

These are the program areas and funding streams that necessitate ‘early’ conversations between OHCS and CAPO leadership when policy changes or funding changes are being contemplated:

- Energy Programs: Low-Income Home Energy Assistance Program (LIHEAP), Energy Conservation Helping Oregonians Program (ECHO), Weatherization, Oregon Energy Assistance Program (OEAP), Department of Energy Weatherization
- Homeless Programs: Emergency Housing Assistance (EHA), State Homeless Assistance Program (SHAP), Emergency Solutions Grant (ESG) and other federal homeless funds
- Community Services Block Grant (CSBG)

Events that will necessitate use of the protocol:

- Implementation of policy or funding changes to the programs when mandated by
 - Federal rule or federal legislation or other federal action
 - State Legislation

- Executive order
- Contemplated program changes of the following nature:
 - OARs
 - Program Manuals
 - Funding formulas
 - Master Grant Agreements
 - Legislative Proposals
- Systemic program issues
 - Example: one CAA reports a problem with program implementation, and other CAAs report the same problem. This should be taken up by CAPO and OHCS leadership to work toward resolution.
 - This does not in any way preclude individual agencies from communicating with OHCS about their individual program issues. This is an effort to speed resolution.

Format of communication

- When notified of an event listed above, CAPO will develop an official position, and CAPO leadership will deliver it to OHCS leadership either in written form or through a meeting.
- CAPO Board meetings are not a ‘feedback’ mechanism but an update mechanism. Discussing an issue or change with the CAPO Board does not constitute receiving CAPO advice.
- Surveying CAAs does not constitute as receiving CAPO advice.

Points of contact for each entity:

- CAPO Executive Director and Board Chair
- OHCS Director, Assistant Program Directors and Assistant Director of Public Affairs

What happens after a decision has been made:

- Once OHCS has made an agreement with CAPO, should an OHCS staff member’s action not reflect that agreement, CAPO members will refer the issue to CAPO leadership who will then bring the matter to OHCS leadership’s attention.
- Once CAPO has made an agreement with OHCS, should CAPO member dissent they will do so on behalf of their CAA, not as a representative of CAPO (i.e. CAPO’s position will remain intact).

Frequency: As necessary and as issues or news and updates arise.

9.10. Feedback to Eligible Entities and State Community Action Association: Describe how the State will provide feedback to local entities and State Community Action Associations regarding performance on State Accountability Measures. Note: This information is associated with State Accountability Measure 5S(iii). The measure indicates feedback should be provided within 60 calendar days of the State getting feedback from OCS.

The state has convened a CSBG Workgroup comprised of representatives from the state association’s board of directors. The board of directors consists of the executive directors of Oregon’s CAA Network. This collaboration allows OHCS to capitalize on the knowledge of the

community action agencies to assist in the development and review of agency policy and procedures.

Currently, community action agencies use two databases for data collection: OPUS and Service Point. Many agencies do not use CSBG funds for direct services to clients, but rather for administrative and direct program costs. Agency feedback has alerted OHCS to two issues: data inconsistencies and difficulties in collection across multiple databases. OHCS will work collectively with both the CSBG Workgroup, CAPO and the Portland Housing Bureau, the agency that administers Service Point, to continue to improve the data collection process to meet State Measure 5S.e: State agency reporting process incorporates the review of the quality of the data submitted by the local entity to ensure that reporting is complete and standard measures and definitions have been used consistently. The objective is to have data collection and review take place frequently enough to promote timely review and adjustment of activities/resource allocation. The initial data collection and review will be done on a semi-annual basis, with the objective of moving toward a quarterly review for a sub-set of measures that will be determined in consultation with the CSBG Network.

Initial discussion around creating a more unified system has occurred and outreach for participants to engage in the resolution process has begun. It is through these collaborations that OHCS will develop a process and communicate progress to the eligible entities.

Priorities of CSBG Workgroup

- CSBG Discretionary Spending
- Training and Technical Assistance Needs
- CSBG Formula Allocations
- Organizational Standards – adoption and implementation
- CSBG Data Collection - consolidation and consistency

SECTION 10

Monitoring, Corrective Action, and Fiscal Controls

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

- 10.1. Specify the proposed schedule for planned monitoring visits including: full on-site reviews; on-site reviews of newly designated entities; follow-up reviews – including return visits to entities that failed to meet State goals, standards, and requirements; and other reviews as appropriate. Note: This information is associated with State Accountability Measure 4Sa(i).**

CSBG Eligible Entity	Review Type	Target Date
ACCESS	• Full onsite	Q4
CAT	• Full onsite	Q2
CCSSD	• Full onsite	Q2
LCHHS	• Full onsite	Q3
Multnomah County	• Full onsite	Q3
ORCCA	• Full onsite	Q4

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

See Appendix – Item C: Program Compliance Monitoring Procedures and OHCS Program Monitoring Guide.

10.3. Initial Monitoring Reports: According to the State’s procedures, by how many calendar days must the State disseminate initial monitoring reports to local entities? Note: This item is associated with State Accountability Measure 4Sa(ii) and may pre-populate the State’s annual report form.

Initial monitoring reports are provided to agencies within 30-60 days of the monitoring visit.

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

10.4. Closing Findings: Are State procedures for addressing eligible entity findings/deficiencies, and the documenting of closure of findings included in the State monitoring protocols attached above? Yes No

10.4a. If no, describe State procedures for addressing eligible entity findings/deficiencies, and the documenting of closure of findings.

10.5. Quality Improvement Plans (QIPs): How many eligible entities are currently on Quality Improvement Plans? Note: The QIP information is associated with State Accountability Measures 4Sc.

There are currently no eligibly entities on Quality Improvement Plans.

10.6. Reporting of QIPs: Describe the State’s process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the State approving a QIP? Note: This item is associated with State Accountability Measure 4Sa(iii).

The state does not have a defined process on this State Accountability Measure. The CSBG Workgroup will work on this item and incorporate it into the monitoring practices overview that will occur as part of the implementation of the Organizational Standards.

10.7. Assurance on Funding Reduction or Termination: Does the State assure, according to Section 676(b)(8), that “any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity

received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b).” Note: This response will link with the corresponding assurance under item 14.8.

Yes No

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

10.8. Does the State CSBG statute and/or regulations provide for the designation of new eligible entities? Yes No

10.8a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for the designation of new eligible entities.

OAR 813-230-0010

Designation of Community Action Agencies

(1) CAAs established under the Economic Opportunity Act of 1964 or the direct successor to such CAAs, have been recognized by the department as designated CAAs for established service areas.

(2) Agencies eligible for recognition as a CAA are political subdivisions of the state; private, nonprofit community organizations and migrant/seasonal farm worker organizations. An applicant agency must demonstrate its programmatic and administrative capabilities for implementing and operating anti-poverty programs and must be able to document that the agency service area has a population of a least 50,000 individuals.

(3) New CAAs will be designated by the department for unserved areas of the state only if CAAs contiguous with or closest to the unserved areas decline to serve such areas.

(4) Except in situations where an agency's status as a CAA is terminated voluntarily or involuntarily, changes in service area designations shall be initiated at the local level and submitted to the department for review and approval or disapproval.

(5) Efforts to establish new CAAs in unserved areas of the state shall be initiated at the local level and submitted to the department for review and approval or disapproval.

Stat. Auth.: ORS 184.082 & 458.505-515

Stats. Implemented: ORS 458.505-515

10.9. Does the State CSBG statute and/or regulations provide for de-designation of eligible entities?

Yes No

10.9a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for de-designation of new eligible entities.

OAR 813-230-0020

Termination of Community Action Agencies

(1) A CAA shall not be terminated by the state of Oregon unless, and after notice and opportunity for hearing, it has been determined that cause existed for termination.

(2) Such notice shall be sent to a CAA by the department and a hearing shall be held before the assistant director when in his or her opinion probable cause for termination exists.

(3) A CAA may appeal the assistant director's decision to the director for hearing on the record.

(4) A CAA may appeal the director's decision to the governor for hearing on the record.

(5) The decision to terminate a CAA will be transmitted to the Secretary for the U.S.

Department of Health and Human Services for review within ten working days of that decision being finalized.

Stat. Auth.: ORS 184.082 & 458.505-515

Stats. Implemented: ORS 458.505-515

- 10.10.** Does the State CSBG statute and/or regulations specify a process the State CSBG agency must follow to re-designate an existing eligible entity? Yes No

10.10a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for re-designation of existing eligible entities.

In the event an eligible entity was to undergo a re-designation, the state would comply with the following process for designation as stated in the CSBG Oregon Administrative Rule 813-230-0010.

Designation of Community Action Agencies

(1) CAAs established under the Economic Opportunity Act of 1964 or the direct successor to such CAAs, have been recognized by the department as designated CAAs for established service areas.

(2) Agencies eligible for recognition as a CAA are political subdivisions of the state; private, nonprofit community organizations and migrant/seasonal farm worker organizations. An applicant agency must demonstrate its programmatic and administrative capabilities for implementing and operating anti-poverty programs and must be able to document that the agency service area has a population of a least 50,000 individuals.

(3) New CAAs will be designated by the department for unserved areas of the state only if CAAs contiguous with or closest to the unserved areas decline to serve such areas.

(4) Except in situations where an agency's status as a CAA is terminated voluntarily or involuntarily, changes in service area designations shall be initiated at the local level and submitted to the department for review and approval or disapproval.

(5) Efforts to establish new CAAs in unserved areas of the state shall be initiated at the local level and submitted to the department for review and approval or disapproval.

Stat. Auth.: ORS 184.082 & 458.505-515

Stats. Implemented: ORS 458.505-515

Fiscal Controls and Audits and Cooperation Assurance

- 10.11. Fiscal Controls and Accounting: Describe how the State's fiscal controls and accounting procedures will a) permit preparation of the SF-425 Federal fiscal reports (FFR) and b) permit the tracing of expenditures adequate to ensure funds have been used appropriately under the block grant, as required by Block Grant regulations applicable to CSBG at 45 CFR 96.30(a).**

All transactions must be supported by appropriate documentation. The same documentation requirements apply to transactions entered directly into SFMA, as well as those initially entered and processed in an agency subsystem that are transmitted to SFMA through an automated interface. In all cases, the documentation must be complete and accurate and must allow a transaction to be traced from the source documentation, through its processing, to the financial reports. All documentation should be readily available for examination.

10.12. Single Audit Management Decisions: Describe State procedures for issuing management decisions for eligible entity single audits, as required by Block Grant regulations applicable to CSBG at 45 CFR 75.521. If these procedures are described in the State monitoring protocols attached under item 10.2, indicate the page number. Note: This information is associated with State Accountability Measure 4S d.

When an audit finding in the subrecipients single audit report pertains to a federal award, the contributing agency is required to issue a management decision within six months of receiving the report. In the management decision, the contributing agency should clearly state whether or not it supports the audit finding, the reasons for the decision and the expected subrecipient action to repay disallowed costs, make financial adjustments or take other action. If the corrective action has not been completed, the contributing agency should include a timetable for completion. The contributing agency may request additional information or documentation from the subrecipient, including auditor assurance related to the documentation. The management decision should describe any appeal process available to the subrecipient. If an audit finding affects programs of more than one agency, the audit agency is responsible for coordinating the management decision for all affected agencies.

10.13. Assurance on Federal Investigations: Will the State “permit and cooperate with Federal investigations undertaken in accordance with Section 678D” of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act? Note: This response will link with the corresponding assurance, item 14.7

Yes No

SECTION 11 Eligible Entity Tripartite Board

11.1. Which of the following measures are taken to ensure that the State verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B of the CSBG Act?

- Attend Board meetings
- Review copies of Board meeting minutes
- Track Board vacancies/composition
- Other

The eighteen eligible entities are monitored at a minimum once every three years. Additionally, the agencies complete a Master Grant Agreement application process every two years. Within both instances, agencies must submit the following for review and approval:

- Board of Directors roster
- Board of Directors bylaws

In addition to the above, the Housing Stabilization and CSBG Compliance Officer, while completing an onsite review, may attend a board meeting, review board minutes and/or interview a board member for additional information.

11.2. How often does the State require eligible entities (which are not on TAPs or QIPs) to provide updates (e.g., copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc.) regarding their Tripartite Boards?

- Annually
- Semiannually
- Quarterly
- Monthly
- Other

Minutes are received and reviewed every biennium, as well as during desktop and on-site monitoring reviews.

11.3. Assurance on Eligible Entity Tripartite Board Representation: Describe how the State will carry out the assurance under Section 676(b)(10) of the CSBG Act that the State will require eligible entities to have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entities' Tripartite Board. Note: This response will link with the corresponding assurance, item 14.10.

The eighteen eligible entities are monitored at a minimum once every three years. Additionally, the agencies complete a Master Grant Agreement application process every two years. Within both instances, agencies must submit the following for review and approval:

- Board of Directors roster
- Board of Directors bylaws

Board of Directors bylaws are evaluated for stated tripartite requirements, including adequate representation and democratic election of board members.

In the event that a complaint against representation has been filed with a community action agency, and the complaint is not resolved at the local level, OHCS has the right to review the complaint, the policy and the actions taken towards resolution. OHCS will work with the agency to ensure the issue is resolved satisfactorily and by agency policy.

- 11.4. Does the State permit public eligible entities to use, as an alternative to a Tripartite Board, “another mechanism specified by the State to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs” as allowed under Section 676B(b)(2) of the CSBG Act.**

Yes No

- 11.4a. If yes, describe the mechanism used by public eligible entities as an alternative to a Tripartite Board.**

Section 12

Individual and Community Income Eligibility Requirements

- 12.1. Required Income Eligibility: What is the income eligibility threshold for services in the State?**

- 125% of the HHS poverty line
- X % of the HHS poverty line (fill in the threshold): _____%
- Varies by eligible entity

- 12.1a. Describe any State policy and/or procedures for income eligibility, such as treatment of income and family/household composition.**

Income is used to ensure that participants do not exceed 125% of the Federal Poverty Level. Income eligibility is factored on all household income before any deduction (gross income) and the number of household members. Households must provide documentation of their gross income for the eligibility period. Household income is determined at the time of initial application and upon recertification. Proof of household income documentation includes, (but not limited to):

- Check stubs
- Award Letters
- Computer print-outs from DHS, Employment Office, SS Office
- Accessing DHS database (FCAS screen)
- Bank statements
- Copies of checks
- Letters from employers
- Self-employment records

Once household income has been determined, reference to current Federal Poverty Guidelines determines if the household is income eligible based on their household size.

For participants with zero income: Eligible entities should use a form for self-declaration.

In work plans for the biennium, each eligible entity will determine how often they re-certify a participant's income (quarterly, annually, or bi-annually).

12.2. Income Eligibility for General/Short Term Services: For services with limited in-take procedures (where individual income verification is not possible or practical), how does the State ensure eligible entities generally verify income eligibility for services? An example of these services is emergency food assistance.

Eligibility determinations must be documented in client files and preferably through third-party documentation. In the event that a client seeking services is unable to provide documentation due to emergency and/or crisis situation, a client may self-certify. Income verification procedures and client file accuracy are reviewed during on-site monitoring visits by OHCS monitoring staff.

12.3. Community-targeted Services: For services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations), how does the State ensure eligible entities' services target and benefit low-income communities?

The state ensures eligible entities' development practices target and benefit low-income communities through the review of:

- Master Grant Agreement
- Community Needs Assessment
- National Performance Indicators
- ROMA results of CSBG IS-Survey

SECTION 13

Results Oriented Management and Accountability (ROMA) System

13.1. ROMA Participation: In which performance measurement system will the State and all eligible entities participate, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act? Note: This response will also link to the corresponding assurance, item 14.12.

- The Results Oriented Management and Accountability (ROMA) System

- Another performance management system that meets the requirements of section 678E(b) of the CSBG Act
- An alternative system for measuring performance and results

13.1a. If ROMA was selected in item 13.1, attach and/or describe the State’s written policies, procedures, or guidance documents on ROMA.

OHCS requires eligible entities to adhere to and submit information on ROMA goals through the Master Grant Agreement process.

Example language from Master Grant Agreement:

A. SUBGRANTEE shall, and shall cause and shall require its SUBRECIPIENTS by contract to assure that data collection and reporting for CSBG funded activities be conducted through the use of OHCS approved HMIS and OPUS management information systems. SUBGRANTEE shall, and shall cause and require its SUBRECIPIENTS to assure that data entry into HMIS and OPUS occur in an accurate and timely manner as satisfactory to OHCS.

B. SUBGRANTEE shall, and shall cause and shall require its SUBRECIPIENTS by contract to submit to the satisfaction of OHCS all reports as required in the Master Grant Agreement including the:

- 1) CSBG-IS report which is due to OHCS annually by February 15th. Report includes: Sections D, E, F and G, the National Performance Indicators.

Prior to the start of each CSBG IS-Survey data collection period, training materials and instruction guides, created by NASCSP, are sent to each eligible entity. In addition, agencies have an opportunity to send staff to multiple ROMA workshops that are offered around the state as part of the technical and training assistance provided by the state association.

13.1b. If ROMA was not selected in item 13.1, describe the system the State will use for performance measurement.

13.2. Indicate and describe the outcome measures the State will use to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization, as required under Section 676(b)(12) of the CSBG Act? Note: This response will also link to the corresponding assurance, item 14.12.

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

- 13.3. How does the State support the eligible entities in using the ROMA system (or alternative performance measurement system)? Note: The activities described under item 13.3 may include activities listed in “Section 8: Training and Technical Assistance.” If so, mention briefly, and/or cross-reference as needed. This response will also link to the corresponding assurance, item 14.12.**

OHCS contracts with the Community Action Partnership (CAPO) to provide training and technical assistance to the eighteen eligible entities. CAPO provides the CAA Network with three ROMA trainings annually. Topics covered include History of ROMA, NPI Targeting and utilizing ROMA data for strategic planning and evaluation.

Additionally, CAPO assists OHCS with ROMA data collection for the annual CSBG IS-Survey and provides technical assistance during this process. OHCS also contracts with the City of Portland to maintain and update the Service Point data management system, to ensure that agencies are able to access data required for completion of the CSBG IS-Survey.

- 13.4. Eligible Entity Use of Data: How is the State validating that the eligible entities are using data to improve service delivery? Note: This response will also link to the corresponding assurance, item 14.12.**

Agencies are required to submit an annual CSBG IS-Survey report annually, in addition to informing OHCS, during the Master Grant Agreement process, of the ROMA Goals which the agency will be participating and tracking.

For the upcoming fiscal year, the state will be strengthening this area through several new workshops on Community Needs Assessments, which will incorporate using ROMA data for strategic planning and services evaluation.

Community Action Plans and Needs Assessments

- 13.5. Describe how the State will secure a Community Action Plan from each eligible entity, as a condition of receipt of CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act. Note: this response will link to the corresponding assurance, item 14.11.**

Eligible entities are required to submit a CSBG Workplan Application as part of their application for funding. As part of the agency-level data review and the CSBG Workplan review, agencies must submit a Community Needs Assessment that has been completed within the last three years. Additional details are stated below in 13.6.

13.6. State Assurance: Describe how the State will assure that each eligible entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity’s Community Action Plan, as required by Section 676(b)(11) of the CSBG Act. Note: this response will link to the corresponding assurance, item 14.11.

The Housing Stabilization Division of the Oregon Housing and Community Services has developed a system that uses a consolidated contract for funding programs provided through community action agencies. By combining our contracts in one overarching instrument we have been able to ensure programmatic linkages throughout all of the programs that exist in the Housing Stabilization Division. Each program, from LIHEAP to CSBG must complete a work plan narrative, which describes how the CAAs will use the funds allocated to them to serve clients. It is through this process that we satisfy assurance '676(b)(11) "The State will secure from each eligible entity in the State, as a condition to receipt of funding by the entity, 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 are to be coordinated with the community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs."

The process is structured around four main concepts:

- (a) Using a community-based planning process which involves community members (particularly low-income community members) in the identification of community needs and development of strategies to meet those needs;
- (b) Coordinating resources to fund strategies designed to address needs;
- (c) Providing a continuum of services that assist community members to deal with emergency needs, stabilize thorough maintenance services and move toward self-sufficiency;
- (d) Determine the effectiveness of strategies included in the CSBG Reporting Forms through use of outcome-based objectives, which are based on the six national goals for ROMA.

In completing their work plan narrative, an applicant must demonstrate that these four concepts are utilized.

SECTION 14

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

14.1 Use of Funds Supporting Local Activities

CSBG Services

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

- (A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of

the Social Security Act, homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals--

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

The State assures use of CSBG funds to address required service activities through compliance with CSBG IS-Survey reporting and Oregon Administrative Rules. The CSBG OAR 813-210-0025 states:

OAR 813-210-0025

Use of Program Funds

(1) A subgrantee agency may use program funds to implement different strategic approaches designed to reduce or eliminate one or more conditions that block the achievement of economic self-sufficiency for low-income households. Such strategies must have measurable and potentially major impact on the causes of poverty in communities in the service area where poverty is a particularly acute problem.

(2) Program funds will be used for allowable program services and activities for eligible low-income households in compliance with program requirements. These services and activities may include, but are not limited to helping members of low-income households:

- (a) Secure and retain meaningful employment;
- (b) Attain an adequate education;
- (c) Make better use of available income;
- (d) Obtain and maintain adequate housing and a suitable living environment;

(e) Obtain emergency assistance through loans or grants to meet immediate and urgent individual and family needs, including the need for health services, nutritious food, housing and employment-related assistance;

(f) Remove obstacles and solve problems that block the achievement of self-sufficiency;

(g) Achieve greater participation in the affairs of the community; and

(h) Make effective use of other programs related to the purpose of this OAR chapter 813, division 210.

(3) A subgrantee agency may also use program funds for a variety of services and activities intended to reduce or eliminate poverty conditions in communities in the service area, including but not limited to:

(a) Providing on an emergency basis for the provision of such supplies and services, nutritious foodstuffs, and related services as may be necessary to counteract conditions of starvation and malnutrition among the poor;

(b) Coordinating and establishing linkages between government and other social service programs to assure the effective delivery of such services to low income households; and

(c) Encouraging the participation of private sector entities in community efforts to ameliorate poverty in the service area.

Stat. Auth.: ORS 456.555 & 458.235

Stats. Implemented: ORS 458.210 - 458.240 & 458.505

Needs of Youth

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

(B) to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as--

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

Oregon Community Action Agencies have a variety of programs dedicated to supporting youth in their communities. Agencies report on services to youth through the CSBG IS-Survey and address the needs of youth in their communities through comprehensive community needs assessments. In 2014, Oregon CAAs utilized \$324,223 of CSBG Funds to support youth-based activities.

Example of youth-focused programming in Oregon:

Clackamas County Social Services Division (CCSSD): The purpose of the Homeless Student Success Project is to build on the access and school district coordination already existing through Homeless Student Liaison program in one high school and its feeder elementary and middle schools in the North Clackamas School District. By imbedding a fulltime bi-cultural bi-lingual social worker with the Homeless Liaison to provide case management and support for these students and their families, the project will demonstrate the ability to track social and academic outcome data and to improve social and academic outcomes. The work is performed by Outside In a medical and social services agency with targeted services for homeless youth. Outside In also operates a school-based health center at Milwaukie High School. The pilot targets the Milwaukie High feeder schools system, but primary medical care is provided through the project to all homeless students from any school in the district. Success from this pilot is intended to demonstrate a model of service delivery through the school district's homeless liaison program, of sufficient value to the district and community that could become sustainable through school district and community funds. Through a partnership with Outside In, regional provider of health care and social services to homeless youth, 258 students, adult family members and younger siblings who are not yet in the school system have been assessed for services. One hundred and fifteen have been deemed qualified to receive services through the HSSP. Five hundred and forty four referrals to mainstream services have been made. Three hundred and thirty-seven mainstream services have been successfully accessed.

Coordination of Other Programs

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

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

Oregon Community Action Agencies partner with multiple organizations to effectively maximize the impact of CSBG funds. Agencies may provide funds to subrecipients who can provide additional specialized services or partner with state and local agencies to strengthen their response to poverty in their community. Insight into the needs of the community is gathered through community needs assessments and partnerships are reported annually in the CSBG IS-Survey.

Example:

Community Action Team (CAT): Persons with a chronic illness frequently find they need to navigate the health care system but are poorly equipped to do so. The Metro Care Transition collaborative provides a coaching intervention that provided patients with supports and tools to enhance self-management during the transition from the hospital back into their own home setting. The findings suggest the efficacy of the model in enhancing self-management and thus decreasing the frequency of hospitalization in order to both save on Medicare costs and improve the health of the patient.

Community Action Team serves as the local Area Agency on Aging. The Area Agency on Aging is part of the Metro Aging and Disability Resource Connection. This larger organization is made up of Area Agencies on Aging partners in neighboring Washington, Clackamas, and Multnomah Counties. In addition, CAT has partnered with 10 hospitals in the Portland area to provide the transition from the hospital into the home.

The coaching interventions are positively impacting CAT clients. Those persons who complete the intervention have a readmission rate of only 11.3 % (number from most recent patient flow report). Coaches have embraced this model and are focused on delivering an intervention that helps activate patients and keeps them from readmitting to the hospital. Gaining remote access early in the program allowed CAT to completely change and improve case finding operations in five hospitals. The change from hospital staff based referrals to coach generated case findings dramatically increased the program referral numbers.

CAT also recently implemented a Skilled Nursing Facility tracking system that has allowed the agency to follow and successfully complete intervention with the clients after they are discharged from the facility. Since beginning this tracking system in March of this year, CAT has been able to assist and track 459 patients. Of those patients tracked, 138 have resulted in completed home visits.

State Use of Discretionary Funds

- 14.2 676(b)(2) Describe “how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in section 675C(b) in accordance with this subtitle, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of this subtitle.” Note: the State describes this assurance under “State Use of Funds: Remainder/Discretionary,” items 7.9 and 7.10**

[No response; links to items 7.9 and 7.10.]

Eligible Entity Service Delivery, Coordination, and Innovation

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

Eligible Entity Service Delivery System

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

Oregon community action agencies set policies, design programs, and evaluate services intended to reduce or eliminate the causes and conditions of poverty.

Each agency utilizes a community-based needs assessment to target services based on local needs. Activities and services vary by agency, depending on the needs of the community, local

resources, and the opportunities for collaboration and partnership with business, private non-profit organizations and state and local government. Currently Oregon has eighteen eligible entities which serve all thirty-six counties in the state.

Community Action Agencies in Oregon are the primary delivery mechanisms for Oregon Housing and Community Services' programs to low-income Oregonians. Oregon Administrative Rules Chapter 813, Division 210 stipulates that federal anti-poverty funds, administered by OHCS, shall be distributed to established CAAs across the state. These funds include: rental assistance, homeless services, low-income energy assistance, weatherization, CSBG and other anti-poverty funding as it becomes available to OHCS. These programs include:

Federal Funds:

- Community Services Block Grant
- Home Tenant-Based Assistance
- Emergency Solutions Grant
- Housing Stabilization Program
- Low Income Weatherization and Energy Assistance
- Low Income Weatherization Programs

Non-Federal Funds:

- Emergency Housing Assistance
- State Homeless Assistance Program
- Oregon Energy Assistance Program
- Energy Conservation Helping Oregonians (ECHO)
- Housing Choice Landlord Guarantee Program

Eligible entities in Oregon use the Community Services Block Grant for programs to assist low-income participants including the elderly poor. CAAs provide a broad range of services utilizing CSBG dollars. The following services, by category, are examples of some of the programs typically seen in our partner agencies:

- Employment: Links with Children, Adult and Family Services Division of Oregon's Department of Human Services to help stabilize individuals and families and provide job counseling and life skills training.
- Economic Development: Training in money management, budgeting, and naturalization for immigrant populations.
- Income Management: Tenant readiness training where many work with local and state landlord groups, to provide courses on how to be a good tenant, including improving credit ratings and paying rent, and household budgeting.

- Housing Assistance: Farmworker assistance, tenant readiness training, and case management housing assistance in partnership with other state service agencies.
- Nutrition: Many of the CAAs provide food assistance.
- Health: Prevention programs and emergency assistance (including pre-natal care and emergency dental assistance).
- Emergency Assistance: All sub-grantee work plan narratives contain a strategy for unforeseen emergencies. The Department also has several discretionary sources of funding for unexpected emergencies.
- Energy Assistance: All CSBG grantees provide energy assistance through the Low-Income Home Energy Assistance Program and state programs. The majority also provide Weatherization Assistance to low-income households.
- Linkages and Coordination with Other Local Entities: Coordination with Habitat for Humanity, religious organizations and other nonprofits to better coordinate services. Examples of partnerships at the local level are with schools, churches, banks and landlord groups.

Eligible Entity Linkages – Approach to Filling Service Gaps

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

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

[No response; links to 9.3b.]

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

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

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

[No response; links to 9.7]

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

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

fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting.”

OHCS supports usage of CSBG funds to develop innovative community and neighborhood-based initiatives. Oregon eligible entities currently devote a percentage of CSBG funds to youth, senior and family-based programs.

Over the next year, as the CSBG Workgroup reviews discretionary policies, a closer look will be given to the possibility of expanding the current discretionary spending priorities to include an innovative fund category.

An example can be found below of one agencies’ innovative approach to family-programming in their community using pass-through CSBG funds.

United Community Action Network (UCAN): Strengthening, Preserving and Reunifying Families Program (SPRF)

The purpose of SPRF is to provide stable housing and case management to clients of DHS child welfare who are either reuniting with their children or are at risk of losing their children. These are families who currently have no housing options and where lack of housing is a major barrier with family unification. UCAN is working with DHS child welfare case managers on client services and DHS is paying for up to four months of rent to stabilize the families. These are families that have poor rental histories that keep them from being able to find housing on the open market. This is a first of its kind relationship for DHS with a non-profit agency that has affordable housing units that it owns and manages. It also is the first time they have done shared case management of this type.

Eligible Entity Emergency Food and Nutrition Services

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

All eligible entities directly provide emergency services and referrals to emergency services. Agencies’ ROMA goals are reviewed during the Master Grant Agreement and CSBG Workplan process to determine the type of services an agency provides. Community needs assessments are also reviewed to determine community needs and resources and ensure that a CAA’s funding application aligns with those needs and does not duplicate other resources in the community. Additionally, agencies that provide emergency services and nutrition services are monitored every three years, and monitoring visits include food sites and nutrition programs, as appropriate and required.

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

- 14.5. 676(b)(5)** Describe how the State will assure “that the State and eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services, and [describe] how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 3 of the Workforce Innovation and Opportunity Act, in the State and in communities with entities providing activities through statewide and local workforce development systems under such Act.”

Note: The State describes this assurance in the State Linkages and Communication section, items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b.

[No response; links to items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b]

State Coordination/Linkages and Low-income Home Energy Assistance

- 14.6. 676(b)(6)** Provide “an assurance that the State will ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such community.”

Note: The State describes this assurance in the State Linkages and Communication section, items 9.2 and 9.5.

[No response; links to 9.2 and 9.5]

Federal Investigations

- 14.7. 676(b)(7)** Provide “an assurance that the State will permit and cooperate with Federal investigations undertaken in accordance with section 678D.”

Note: the State addresses this assurance in the Fiscal Controls and Monitoring section, item 10.13.

[No response; links to 10.13]

Funding Reduction or Termination

- 14.8. 676(b)(8)** Provide “an assurance that any eligible entity in the State that received funding in the previous fiscal year through a community services block grant made under this subtitle will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b).”

Note: the State addresses this assurance in the Fiscal Controls and Monitoring section, item 10.7.

[No response; links to 10.7]

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

- 14.9. 676(b)(9)** Describe how the State will assure “that the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations.”

Note: the State describes this assurance in the State Linkages and Communication section, item 9.6.

[No response; links to 9.6]

Eligible Entity Tripartite Board Representation

- 14.10. 676(b)(10)** Describe how “the State will require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation.”

Note: the State describes this assurance in the Eligible Entity Tripartite Board section, 11.3

[No response; links to item 11.3]

Eligible Entity Community Action Plans and Community Needs Assessments

- 14.11. 676(b)(11)** Provide “an assurance that the State will secure from each eligible entity in the State, as a condition to receipt of funding by the entity through a community services block grant made under this subtitle for a program, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs.”

[No response; links to items 13.5 and 13.6]

State and Eligible Entity Performance Measurement: ROMA or Alternate system

- 14.12. 676(b)(12)** Provide “an assurance that the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to section 678E(b), or an alternative

system for measuring performance and results that meets the requirements of that section, and [describe] outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization.”

Note: The State describes this assurance in the ROMA section, items 13.1, 13.2, 13.3, and 13.4.

[No response; links to 13.1, 13.2, 13.3, and 13.4]

Validation for CSBG Eligible Entity Programmatic Narrative Sections

14.13. 676(b)(13) Provide “information describing how the State will carry out the assurances described in this section.”

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

[No response for this item]

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

SECTION 15 Federal Certifications

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

15.1 Lobbying

Certification for Contracts, Grants, Loans, and Cooperative Agreements

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

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

Statement for Loan Guarantees and Loan Insurance

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

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this

statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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

15.2 Drug-Free Workplace Requirements

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

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

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

- (7) If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).
- (8) Definitions of terms in the Non-procurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

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

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

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

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

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Grantees Other Than Individuals)

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

- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (b) Establishing an ongoing drug-free awareness program to inform employees about - -
 - (1) The dangers of drug abuse in the workplace;
 - (2) The grantee's policy of maintaining a drug-free workplace;
 - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;

- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will - -
 - (1) Abide by the terms of the statement; and
 - (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- (e) Notifying the agency in writing, within 10 calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
- (f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -
 - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

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

Place of Performance (Street address, city, county, state, zip code)

Check if there are workplaces on file that are not identified here.

Alternate II. (Grantees Who Are Individuals)

- (a) The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;

- (b) If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other designee, unless the Federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.

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

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

15.3 Debarment

CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS

Certification Regarding Debarment, Suspension, and Other Responsibility Matters - -

Primary Covered Transactions

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.
- (2) The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.
- (3) The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.
- (4) The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
- (5) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded,

as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.

- (6) The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.
- (7) The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusive-Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
- (8) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.
- (9) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
- (10) Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

Certification Regarding Debarment, Suspension, and Other Responsibility Matters - -

Primary Covered Transactions

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

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

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
- (2) The certification in this clause is a material representation of fact upon which reliance was
- (3) placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
- (4) The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.

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

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

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

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

15.4 Environmental Tobacco Smoke

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

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

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



Kate Brown
Governor

August 12, 2015

Oregon Housing and Community Services is the lead agency in Oregon for the administration of the Community Services Block Grant programs.

I, Kate Brown delegate my authority to the Oregon Housing and Community Services Assistant Director to certify all administrative assurances and certifications as required by CSBG statutes.

Sincerely,

A handwritten signature in black ink, appearing to read "Kate Brown".

Governor Kate Brown

KBdl



254 STATE CAPITOL, SALEM OR 97301-4047 (503) 378-3111 FAX (503) 378-8970
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Appendix B

Faith-Based Community Action Agency Partnerships

ACCESS

Jackson County, OR

- ACCESS Volunteers
- Ascension Lutheran Church
- Ashland Seventh Day Adventist Church
- Bread of Life Church
- Calvary Neighborhood Outreach Pantry
- Church of Latter Day Saints (LDS) Ashland (1st & 2nd Wards)
- Church of Latter Day Saints (LDS) Medford (1st, 2nd, 5th & 6th Wards)
- Church of the Good Shepherd
- Church of the Nazarene
- First Christian Church of Medford
- First Presbyterian Church of Phoenix
- Gloria Dei Lutheran Church
- Gold Hill Christian Center
- Gospel Mission
- Interfaith Vare Community
- Medford Congregational Church
- Medford Seventh Day Adventist Church
- Ministry Center
- Prospect Assembly of God
- Prospect Baptist Church
- Rogue Retreat
- Rogue River Seventh Day Adventist Church
- The Salvation Army
- St. Mark's Episcopal Church
- St. Mary's School (Sacred Heart Catholic Church)
- St. Peter's Lutheran Church
- Trail Christian Fellowship
- Westminster First Presbyterian
- New Beginnings Church—Harvest House
- Lampman Baptist Church
- Central Point Seventh Day Adventist
- Talent Methodist Church-BP
- ICARE—Cascade Ranch
- Youth for Christ—Campus Life
- St. John's Lutheran Church
- Mt. View Christian Church
- Joy Christian Fellowship

- Rogue Valley Christian Church
- Zion Lutheran Church
- Church of Latter Day Saints
- Hearts with a Mission

Community Action Organization (CAO)

Washington County, OR

- Calvin Presbyterian
- Lutheran Community Services
- Hillsboro Emergency Fund (multi-church consortium)
- HomePlate (multi-church consortium)
- Neighborshare (multi-church consortium)
- Family Promise (multi-church consortium)
- Forest Grove UCC
- WESTCO (30 church consortium)
- Interfaith Religion Action Network
- St. Anthony's
- St. Francis (Sherwood)
- Sunrise Church
- Village Baptist Church
- Catholic Charities
- St. Vincent de Paul
- Oregon Area Jewish Committee

Community Action Program of East Central Oregon (CAPECO)

Gilliam, Morrow, Umatilla and Wheeler Counties, OR

- Agape House, Hermiston
- Arlington Lutheran Church
- Condon Baptist Church
- Episcopal Church, Hermiston
- Episcopal Church of the Redeemer, Pendleton, Hermiston
- First Christian Church, Condon, Milton-Freewater, Hermiston, Pendleton
- First Presbyterian Church, Pendleton
- First United Methodist Church, Pendleton
- Helping Hand – United Methodist Church, Pendleton
- Peace Lutheran Church, Pendleton
- Pendleton Church of the Nazarene
- Pendleton First Christian Church
- Pendleton Presbyterian Church
- Pendleton St. James Episcopal Church
- Salvation Army, Pendleton
- St. James Episcopal Church, Milton-Freewater
- St. John's Catholic Church, Condon

- St. John's Catholic Church, Fossil
- St. Mary's Outreach
- Seventh Day Adventist – The Food Basket
- The Bread Basket
- Tonya's House, Presbyterian Church
- United Church of Christ
- Valley Christian Center

Community Action Team, Inc. (CAT)

Clatsop, Columbia and Tillamook Counties, OR

Astoria Christian Church

- Astoria Rescue Mission
- Bethany Lutheran Church
- Calvary Assembly of God
- Christ Episcopal Church
- Columbia County Ministerial Association
- First Christian Church
- First Evangelical Lutheran Church
- Grace Baptist Church
- Grace Episcopal Church
- Methodist Church
- Our Savior's Lutheran Church
- Peace Lutheran Church
- Plymouth Presbyterian
- Salvation Army
- St. Frederick's Catholic Church
- St. Mary Star of the Sea Catholic Church Astoria
- St. Peter the Fisherman Catholic Church Seaside
- St. Vincent de Paul
- St. Wenceslaus
- The Church of Jesus Christ of the Latter Day Saints
- Tillamook Adventist Center
- Tillamook Nazarene Church
- Tillamook United Methodist Church
- Tillamook YMCA
- Warren Baptist Church
- Warren Community Fellowship

Community Connection of Northeast Oregon (CCNO)

Baker, Grant, Union and Wallowa Counties, OR

- Salvation Army (2)
- Habitat for Humanity
- Interfaith Caregivers
- Ministerial Association

- Neighbor-to-Neighbor Ministries
- Churches in all counties (Catholic, Episcopal, Latter Day Saints, Lutheran, Methodist, Presbyterian)

Clackamas County Social Services Division (CCSSD)

Clackamas County, OR

- Atkinson Memorial Church – Oregon City
- Beautiful Savior Lutheran Church
- Beaver Creek United Church of Christ
- Beaver Creek/Carus Food Pantry
- Canby Alliance Church
- The Canby Center
- Canby Christian Church - Canby
- Canby United Methodist - Canby
- Catholic Charities
- Christ the King - Canby
- Christ the Vine Lutheran Church
- Church on the Mountain – Hoodland
- Clackamas Friends Church
- Colton Foothills Grange
- Community Presbyterian Church of Sandy
- Country Christian Church – Molalla
- Creator Lutheran Church - NC
- Dorcas Society - SDA
- Eastern Orthodox Church - NC
- Emmanuel Presbyterian Church – West Linn
- Feed the Hungry – St. John’s Episcopal
- Foothills Pantry
- Gladstone Seventh Day Adventist
- Good Roots Church - NC
- Gracepoint Church - NC
- Grand View Baptist Church
- H.O.P.E. Church of the Nazarene
- H.O.P.E. Cornerstone Community Center
- H.O.P.E. First Baptist Church
- H.O.P.E. First Presbyterian Church
- H.O.P.E. First United Methodist Church
- H.O.P.E. St. John the Apostle Church
- Harvest Christian Center
- King of Kings Lutheran Church
- Lake Grove Presbyterian Church
- LOVE, Inc.
- Milwaukie Christian Church

- Milwaukie Lutheran Church - NC
- Milwaukie Presbyterian Church
- Molalla Christian Church
- Mountain View Christian Church
- Mountain View Community Church
- New Life Four Square Church – Canby
- Oak Grove Church
- Oak Hills Presbyterian Church - NC
- Oregon City Evangelical Church
- Oregon City United Methodist Church
- OSLC Food Pantry
- Our Lady of the Lake
- PACS
- Park Place Evangelical Church
- Prince of Life Lutheran Church – Oregon City
- Rolling Hill Community Church
- Southgate Chapel - Canby
- St. James Catholic Church
- St. Paul’s United Methodist Church - NC
- St. Phillip Benizi
- St. Stephen Lutheran Church - Gladstone
- St. Vincent de Paul – Christ the King
- St. Vincent de Paul – Estacada
- St. Vincent de Paul – Portland
- St. Vincent de Paul – St. James, Molalla
- St. Vincent de Paul – St. John the Apostle, Oregon City
- St. Vincent de Paul – St. John the Baptist, Milwaukie
- St. Vincent de Paul – St. John, Sandy
- St. Vincent de Paul – St. Michael, Sandy
- St. Vincent de Paul – St. Patrick’s, Canby
- St. Vincent De Paul Mobile Kitchen
- St. Vincent De Paul-Portland
- The Father’s Heart Street Ministry
- Trinity Church - NC
- Tualatin Seventh Day Adventist
- Turning Point Church – Gladstone
- Valley View Church - Clackamas
- Wichita Evangelical Church - NC
- Willamette United Church of Christ
- William Temple House
- Wilsonville Community Sharing
- Wilsonville United Methodist Church

Community Services Consortium (CSC)

Benton, Lincoln and Linn Counties, OR

- Albany Helping Hands
- Beit Am Jewish Community
- Brownsville Baptist Church
- Calvary Baptist Church
- Caring Team Ministries – Lebanon
- Christwalk – Lebanon
- Church of the Good Samaritan
- Church of the Nazarene
- College United Methodist Church – Philomath
- Corvallis Mennonite Fellowship
- First Baptist Church
- First Presbyterian Church – Newport
- First Presbyterian Church - Corvallis
- First Christian Church of Corvallis
- First Congregational United Church of Christ
- First United Methodist Church
- FISH of Albany
- FISH of Benton County
- FISH of Lebanon
- Grace Center
- Habitat for Humanity, Lebanon
- Habitat for Humanity, Corvallis
- Hope Inc. – Sweet Home
- Kings Circle Assembly of God
- Lebanon Soup Kitchen
- Lighthouse Vineyard Soup Kitchen
- LOVE, Inc. Albany
- LOVE, Inc. Corvallis
- Methodist Church - Jefferson
- Neighbor to Neighbor – Philomath
- Northwest Hills Community Church
- Our Savior’s Lutheran Church
- Peace Lutheran
- Pregnancy Alternative Center - Lebanon
- Presbyterian Child Care Center
- Religious Society of Friends
- River Center – Lebanon
- Sacred Heart Catholic Church - Newport
- Salvation Army
- Seventh Day Adventist Church
- Seventh Day Adventist Food Bank – Sweet Home

- Sharing Hands - Brownsville
- SHEM (Sweet Home Emergency Ministries)
- Signs of Victory Mission – Albany
- Signs of Victory Soup Kitchen – Albany
- South Benton County Food Bank – Monroe
- Spiritual Assembly of the Bai'is
- St. Mary's Soup Kitchen - Albany
- St. Mary's Stone Soup – Corvallis
- St. Stephen's Church
- St. Vincent DePaul – Corvallis
- St. Vincent de Paul – Lebanon
- Sweet Home Assembly of God
- Teen Challenge – Lebanon
- Teen Challenge – Shedd
- The Gathering - Lewisburg
- The Lord's Storehouse - Lebanon
- Trinity Baptist Church – Lebanon
- Unitarian Universalist Fellowship
- We Care – Benton County

Community in Action (CinA)

Harney and Malheur Counties, OR

- Bethany Presbyterian
- Better Together
- Bible Baptist
- Blessed Sacrament
- Blue Sage Ministerial
- Burns Foursquare
- Christian Church
- Christian Life Fellowship
- Church of the Living Waters
- Church of the Nazarene
- Community Church
- Crane Fellowship
- Drewsey Community Church
- Faith Baptist
- First Baptist
- First Christian
- First Evangelical Lutheran Church
- Harvest House Missions
- Holy Family Catholic
- Jesus Christ of the Latter Day Saints
- Kaleo

- Love, Inc.
- Origins Community Church
- Peace Lutheran
- Pilgrim Lutheran
- Pioneer Presbyterian Church
- Seven Say Adventist
- St. Andrews Episcopal
- St. Matthew's
- St. Paul Lutheran
- United Methodist
- Westbank Christian

Klamath/Lake Community Action Services (KLCAS)

Klamath and Lake Counties, OR

- BBC Ministries
- Faith Christian Church
- Faith Tabernacle
- Foothills Christian Fellowship
- Hope Lutheran Church
- Inner Court Family Center
- Integral Youth Service
- Klamath Assembly of God
- Klamath Christian Center
- Klamath Falls Gospel Mission
- Lake County Ministerial Association
- Lutheran Community Services in both Klamath & Lake Co.
- Methodist Church
- Salvation Army
- St. Pius X Parish
- St. Vincent dePaul
- United Christian Ministries

Lane County (LC)

Lane County, OR

- Catholic Community Services of Lane County
- Dayspring Ministries
- Food For Lane County (food pantries located in churches countywide)
- Ebbert United Methodist Church
- Eugene Faith Center
- Eugene Mission
- First Christian Methodist
- First United Methodist Church
- Hosea Youth Services

- PeaceHealth
- Resurrection Church
- Springfield Adventist
- St. Mary's Episcopal
- St. Vincent de Paul of Lane County
- Temple Beth Israel
- Trinity United Methodist
- Unitarian Universalist
- Valley Covenant Church
- Victory Baptist

Mid-Columbia Community Action Council (MCCAC)

- Hood River, Sherman and Wasco Counties, OR
- FISH
- Salvation Army
- Seventh Day Adventist
- St. Vincent de Paul

Multnomah County Department of County Human Services (MULTCO)

Multnomah County, OR

- Cambodian and Lao Buddhist Temples
- Asociación Evangélica del Noroeste
- AS IS Christian Church
- Bosniaks Educational Cultural Organization
- Catholic Charities
- Casa del Padre de Portland
- City Park Church
- City Team Ministries
- Clay Street Table
- Community Legacy Program of Our United Villages
- Consumed by the Harvest Family Worship Center
- Daybreak Shelter Network
- East Hill Church
- Ecumenical Ministries of Oregon
- First Baptist Church – Gresham
- First Congregational United Church of Christ, Portland
- First African Methodist Episcopal Zion Church
- FISH
- FreeWay 418
- Freedom Square Church
- Goose Hollow Shelter (United Methodist Church)
- Grace Memorial Episcopal Church
- Grace Community Church – Gresham

- Iglesia Biblica Vida
- Iglesia de la Restauración Elim
- Imago Dei Community
- Interfaith Council of Greater Portland
- Interfaith Movement for Immigrant Justice
- Jewish Family Services
- Jewish Federation of Oregon
- Jewish Women's League
- Luis Palau Association
- Lutheran Community Services
- Muslim Educational Trust
- My Father's House
- My Sister's House
- New City Initiative
- Portland Four Square
- Portland Mennonite Church
- Portland Rescue Mission
- Raphael House
- Rescue Mission
- Rivergate Community Church
- Salvation Army
- Sheppard's Door
- School Partnership Network –
- St. Francis
- St. Henry's Catholic Church
- St, Mary's Academy
- St. Vincent de Paul
- Sunnyside Methodist
- The Church of JESUS CHRIST of Latter –Day Saints
- Union Gospel Mission
- Vancouver Avenue First Baptist Church
- Volunteers of America
- William Temple House

Mid-Willamette Valley Community Action Agency (MWVCAA)

Marion and Polk Counties, OR

- Blanchet Catholic School
- Calvary Lutheran
- Catholic Community Services
- Christ Church of Monmouth
- Christ the King Church
- Church of Christ
- City Vibe

- Congregations Helping People
- Dallas Alliance Church
- Dallas Knights of Columbus
- Dallas Ministerial Association
- Evangelical Bible Church
- Faith Evangelical Church
- Father Taaffe Foundation
- First Baptist Church of Salem
- First Christian Church
- First Church of the Nazarene
- First Congregational United Church of Christ
- First Methodist Church
- First Presbyterian (Dallas)
- First Presbyterian (Salem)
- First Presbyterian of Woodburn
- Foothills Church
- Foursquare Community Church Medical Clinic
- Gospel Fellowship
- Grace Community Church
- Holy Cross Lutheran Church
- Hope on Wheels
- Immaculate Conception Church
- Immanuel Lutheran (Woodburn)
- James II Kitchen
- Northgate Community Church
- Oasis Community Church
- Pauline Memorial Ame Zion Church
- Peoples Church
- Salem Alliance
- Salem First Church of the Nazarene
- Salem Interfaith Hospitality Network
- Salem Leadership Foundation
- Salvation Army
- Seventh Day Adventist
- Simonka House
- St Boniface
- St Francis Shelter
- St Joseph Shelter
- St Luke's Church
- St Patrick
- St Phillip Catholic
- St Vincent de Paul
- Trinity Lutheran

- Union Gospel Mission
- United Methodist
- Valley Life Church
- Woodburn Foursquare Church

NeighborImpact

Crook, Deschutes and Jefferson Counties, OR

- Bethlehem Inn
- Church of the Transfiguration
- Community of Christ
- Compass Church
- Eastmont Church
- Faith Harvest Helpers
- First Baptist Church of Prineville
- First Presbyterian Church
- First Presbyterian Quilters
- The Giving Plate
- Grace First Lutheran Church
- Grandma's House of Central Oregon
- Habitat for Humanity-Bend
- Habitat for Humanity-Sisters
- Holy Trinity Share and Care
- House of Hope
- Jericho Road
- LINC (Madras)
- Lutheran Community Church
- Madras Methodist Church
- Nativity Lutheran (Bend)
- Newport Avenue Church of Christ
- Our Savior Lutheran Church
- Redemption House
- Redmond Community Church
- Salvation Army-Bend
- Seventh Day Adventist - Madras
- Seventh Day Adventist - Redmond
- Smith Rock Christian Church
- South County Outreach
- St. Vincent de Paul - all communities
- Sunriver Christian Fellowship
- Three Sisters Fellowship
- Trinity Episcopal Church - Family Kitchen
- Warm Springs Presbyterian Church

Oregon Human Development Corporation (OHDC)

Statewide Farmworker Organization

- Ascension Lutheran Church
- BBC Ministries
- Bible Baptist Church
- Calvary Lutheran Church
- Casa Metodista Church
- Catholic Community Services
- Catholic Charities
- Centro Hispano
- Church of the Nazarene
- Community Baptist
- Community Church of Christ
- Ecumenical Ministries of Oregon
- Evergreen Christian
- Faith Christian Church
- Faith Tabernacle
- First Baptist Church
- First Congregation
- Four Square Church
- God's Lighthouse
- Golden Road Baptist
- Gorge Ecumenical Ministry
- Heritage Baptist
- House of Zion Christian Fellowship
- HomePlate (multi-church consortium)
- Jewish Community Services
- Klamath Falls Gospel Mission
- Methodist Church
- Nyssa Catholic Church
- Ontario Bible Missionary
- Ontario Catholic Church
- Ontario Ministerial Association
- Ontario St. Mathew's Church
- Sacred Heart Catholic Church
- Salvation Army
- Sonrise Church
- St. Andrew's Church
- St. Anne's Church
- St. Anthony's Church
- St. Francis of Assisi Catholic Church
- St. Henry's Church
- St. Joseph's Catholic Church
- St. Luke's Catholic Church
- St. Mary's Catholic Church

- St. Mathew's Catholic Church
- St. Michael's & All Angels Church
- St. Patrick's Catholic Church
- St. Paul Church
- St. Peter's Church
- St. Vincent DePaul
- United Methodist Church
- Woodburn Worship Center
- YMCA
- YWCA

Oregon Coast Community Action (ORCAA)

Coos and Curry Counties, OR

- Church of Christ, North Bend
- Coos Bay Seventh Day Adventist
- Coquille Seventh Day Adventist
- Emmanuel Episcopal Church, Coos Bay
- Faith Lutheran Church of North Bend
- ADD- Faith Lutheran Church of Coquille
- First Baptist Church of Coos Bay
- First Presbyterian Church of Coos Bay
- First Presbyterian Church of North Bend
- Gloria Dei Lutheran
- Gold Beach Seventh Day Adventist
- His Haven of Hope, Brookings
- Holy Redeemer Catholic Church, North Bend
- Knights of Columbus
- Langlois Community Church
- Myrtle Beach Assembly of God Church
- Myrtle Point Ministerial Association
- Pregnancy Resource Center, Coos Bay
- Salvation Army
- South Coast Food Share (Coos Bay Seventh Day Adventist, Coquille Seventh Day Adventist, Ecumenical Ministries, Gold Beach Seventh Day Adventist, Langlois Community Church, Myrtle Point Assembly of God Church, Myrtle Point Ministerial Association, Outreach Gospel mission, Gold Beach Christian Helpers, Bandon Restoration Worship Center, Salvation Army, North Bend Presbyterian,)
- South Coast Gospel Mission
- St. Monica's Catholic Church
- Star of the Sea Catholic Church, Brookings
- Teens Unlimited, Coos Bay Area
- T.H.E. House, Coos Bay
- Union Gospel Mission, Harbor

United Community Action Network (UCAN)

Douglas and Josephine Counties, OR

- All Souls “Table of Plenty”
- Calvary Chapel
- Casa de Belen
- Catholic Charities
- Cave Junction Dorcas - Pantry
- Christian Service Network
- Community United Project (CUP)
- Edgewater Christian Fellowship
- Faith House
- Faith Lutheran
- Ferguson House
- Fikso Family Center
- First Christian Church
- First United Methodist Church
- FISH Roseburg
- FISH (Newman Methodist Church)
- FISH Drain
- Foundation Fellowship
- Gospel Rescue Mission Grants Pass
- Grants Pass Dorcas
- Heading Home
- Home for Good
- Illinois Valley Dorcas
- Lifelines Ministry - Pantry
- Lower Umpqua Ministerial Association
- Ministerial Association
- North Slope Village
- North Valley Dorcas
- Parkway Christian Center
- Parish Nurses
- Rescue Mission Roseburg
- River Valley Community Church (Senior Outreach)
- ROC-Reaching Our Community (First Christian Church)
- Salvation Army
- Samaritan Inn
- St. Francis Church
- St. Joseph’s Church
- St. Vincent de Paul Roseburg and Grants Pass
- Seventh Day Adventist Church – Dorcas Ministry
- Seventh Day Adventist Church - Canyonville
- Seventh Day Adventist Church – Glide

- Seventh Day Adventist Church - Roseburg
- Williams Community Church
- Wolf Creek Community Church
- Zion Ministries

Yamhill Community Action Partnership (YCAP)

Yamhill County, OR

- Amity Assembly of God
- Blanchet House of Hospitality/YC Farm
- Christ Community Church
- Christian Church
- Church on the Hill
- City Church of Promise
- Coast Hills Community Church
- Cove Orchard Pentecostal Church
- Dayton First Baptist Church
- First Baptist Church McMinnville
- FISH
- George Fox University
- Joseph's Storehouse
- Joyful Servant Lutheran Church
- Lafayette Community Church
- Linfield College
- LOVE, Inc.
- Lutheran Family Services
- Manos Abiertos
- McCabe United Methodist Women
- McMinnville Cooperative Ministries
- McMinnville Covenant Church
- McMinnville Spanish Seventh Day Adventist Church
- McMinnville Seventh Day Adventist Church
- Ministerial Association
- New Horizons Church
- Newberg Christian Church
- Newberg Friends Church
- Newberg Ministerial Association
- Our Lady of Guadalupe Trappist Abbey
- Presbyterian Church
- Providence Newberg Hospital
- Salvation Army
- St. Barnabas Episcopal Church
- St. James Catholic Church
- St. John's Catholic Church

- St. John's Lutheran Church
- St. Paul's Lutheran Church
- St. Vincent de Paul
- The Brigittine Monastery
- Thrivent
- True Vine Christian Fellowship
- Unitarian Universalist Fellowship of McMinnville
- Yamhill County Gospel Rescue Mission

Appendix C

Program Compliance Monitoring Procedures

Agencies who receive funding through Oregon Housing & Community Services (OHCS) will be monitored for compliance with Federal, State and/or local requirements as stipulated in the OHCS Master Grant Agreement, Exhibit B, Standard Terms and Conditions.

The purpose of the monitoring is to ensure Subgrantees and their subrecipients comply with the terms of the MGA Agreement and that grant fund awards are used properly for authorized purposes.

Frequency

Depending on the type of funding and monitoring requirements attached to it, Agencies will be monitored annually, every three years, or more often depending on risk assessments.

Notification

An Agency's director will be contacted by email no later than 30 days prior to proposed monitoring date to inform agency of upcoming monitoring visit. Upon email confirmation that the proposed date is acceptable, OHCS will follow with an emailed confirmation letter, and any supplement information, to Agency director, and any program people identified in initial contact. Request will be made for Agency to provide list of all clients served with funds during target Fiscal Year.

Desk Pre-Review

An Agency's Master Grant Agreement and Addendums will be reviewed prior to the monitoring visit to obtain information on how funds are used. File audit selection will be made from the list of clients provided and number of files to audit is outlined below:

The minimum file sample will be 2 client files, per program source.	
Number of households served, per program	Number of files to audit, per program
100 or fewer	2 files, plus 1 for each 50 households over 50
101 - 600	5 files, plus 1 for each 100 households over 200
Over 600	9 files.

On-Site Monitoring Visit

OHCS will initially meet with staff involved in the monitoring and explain the intent and process of the visit. OHCS will conduct the monitoring visit using OHCS developed auditing forms. Monitoring forms will also be utilized to interview staff regarding overall agency policies and procedures.

The compliance officer will review each file to ensure that all program guidelines were followed appropriately. A program specific audit worksheet will be completed for each file reviewed which will identify any deficiencies, notes needed to bring up in the exit interview, and compile information for the Monitoring Report.

OHCS will meet with staff for an exit review, and provide an overview of issues to be addressed in the Monitoring Report.

Desk Monitoring

The HOME Tenant Based Rent Assistance (HTBA) program must be monitored annually. OHCS will request Agency's to send client files electronically through OHCS's Webdoc system during years when site visits are not required for other programs.

Monitoring Report

Within 60 days after an on-site inspection, OHCS will endeavor to provide Subgrantee with a written report as to its findings from that inspection. OHCS may advise the Subgrantee of any corrective action that it deems appropriate based upon its monitoring activities or otherwise. The report will ask the sub-grantee to respond with corrective actions to each deficiency with an estimated completion date attached to them and if necessary, include mandatory corrective action steps outlined by OHCS. Subgrantee shall timely satisfy such corrective actions required by OHCS.

Risk-Based Analysis

The Monitoring Report will include an overall rating definition. The overall rating is weighted as explained below. This rating may affect frequency of scheduled monitoring visits.

Agencies will be evaluated on their level of risk for waste, fraud, and abuse of funding sources. Those agencies identified as being "high-risk" should be reviewed. Risk factors such as the amount of funds received, history of complaints and/or program violations, length of time operating programs, length of time since last review, known turnover of director and/or key staff, and/or other applicable factors when formulating a risk assessment.

Resolution

OHCS may track and follow up with Subgrantee regarding the correction by Subgrantee of findings made or other corrective actions required in OHCS' monitoring of Subgrantee's performance under this Agreement. The tracking record developed by OHCS may include, without limitation: findings, corrective actions and deliverables, due dates, responsible parties, actions taken, and final resolution. Subgrantees shall resolve findings and other required corrective actions within the timeframes reasonably given by OHCS by written report or otherwise.

If the OHCS Compliance Officer determines, in its sole discretion, that Subgrantee has failed to comply timely with any material Obligation, including but not limited to any OHCS directive or term of a corrective action plan, the Compliance Officer will refer Agency to Program Manager to exercise any remedies available under the MGA, applicable law, or otherwise.

If follow up/corrective actions are required, the compliance officer will follow up directly with the sub-grantee. The monitoring will not be closed until all follow up items/corrective actions are satisfactorily completed

Review Closing

Once all follow up/corrective actions are satisfactorily completed, a closing letter will be sent to the sub-grantee and the monitoring review will be closed.

OHCS Program Monitoring Guide

Agency Contact Information:

AGENCY: *enter Agency Name.*

DATE *enter Date.*

Exec Director: *enter Directors Name.*

Phone: *enter Directors Phone.*

E-mail *enter Directors email Address.*

Master Grant Agreement (MGA) Grant Number: #	
Date Grant Began: 7/1/2013	Date Grant End: 6/30/2014

Programs to be monitored:

- ❖ Choose an item.

Agency Program Coordinators Interviewed during audit:

1. Name, Title, Phone, and Email Address.
2. Name, Title, Phone, and Email Address.
3. Name, Title, Phone, and Email Address.
4. Name, Title, Phone, and Email Address.
5. Name, Title, Phone, and Email Address.

1. Agency Documents:

- a) Program Coordinator possess/retain current program manual(s)/OAR/CFRs.
Comment.
 - ESG Operations Manual** - v. 9/18/2013
 - 24 CFR Part 576
 - HTBA/LIRHF Program Manual** - FY2007-FY2009
 - HTBA only - 24 CFR Part 92 7/24/13
 - HUD Notice CPD 96-07
 - HSP Program Manual** – 12/2/13
 - OAR Division 51 813-051-0000
- b) Agency has copy of current executed Master Grant Agreement, approved amendments, program participation agreements, and other related documents.
Comment.
- c) Does the agency collect data on all of its current year performance measures?
Comment.
- d) Agency integrates delivery of services and programs. **Comment.**

Notes: [Click here to enter notes.](#)

2. Policy & Procedures

- a) Agency has written policies and procedures for all programs. **Comment.**
 ESG – HP & RRH: 24 CFR,576.500 (a)
 HTBA – HUD Notice CPD 96-07, VI, B.
- b) Policies provide a clear process for determining the type, level, and duration of assistance for each program participant. **Comment.**
- c) Policy and/or Procedures in place to guarantee the confidentiality of client records. **Comment.**
- d) Agency has a written procedure governing the termination and grievance process. **Comment.**
- e) Written grievance procedure made available to clients. **Comment.**
- f) Agency has policy in place to address possible LBP situations. **Comment.**
- g) Agency has a policy or process to assist those with LEP. **Comment.**
- h) Agency has a written policy for employees seeking agency services. **Comment.**
- i) Process to ensure Income Limit, Utility, and FMR schedules are updated. **Comment.**

Notes: [Click here to enter notes.](#)

3. Security and Technical Standards

- a) Agency has a signed “Confidentiality Statement” from each staff member and volunteer that has access to client information. **Comment.**
- b) All Agency staff, sub-recipients and volunteers receive instruction on the use of and maintenance of confidential data. **Comment.**
- c) Agency maintains written records that document participant completed confidentiality instruction. **Comment.**
- d) Agency staff, sub-recipients and volunteers receive refresher training How often

	Yes	No	N/A
must a worker take a refresher session? Comment.			
e) Agency monitors workers for the proper use of confidential data using only that information essential for program services and administration. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) All client information is securely maintained. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) All agency staff and/or qualified users have unique individual system IDs for accessing data management systems with confidential client data. Staff leaving service are removed from systems as part of an exiting process. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Is there a list of active authorized HMIS/OPUS users? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Do computers used to access HMIS have a locking screen saver. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) Is the HMIS privacy policy posted: in office and website? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
k) Release of Information and Refusal of Authorization used for all clients and placed in client files. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
l) How long after program entry or exit does it take to enter client information into HMIS. Click here to enter days. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notes: Click here to enter notes.			
4. Outreach			
a) There is an acceptable outreach and marketing plan, such as an Affirmative Marketing Plan. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the agency have written marketing materials about the programs available for potential landlords. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Documentation of outreach showing targeted populations and advertisements offering services provided. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Fair Housing language & logo included in agency handbooks, policies, and other program literature. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Required notices relative to Equal Employment Opportunity and Fair Housing Opportunity posted. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notes: Click here to enter notes.			
5. Equitable Access			
a) Fully accessible (i.e.) barrier-free) site is available for persons to apply for program benefits. If not, what accommodations are made available? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Are programs accessible to the visually and hearing impaired? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) What geographic barriers exist in your community that prohibits clients accessing services and what is the agency doing to address these barriers? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Does Agency have a Fair Housing contact person? Name & Title.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notes: Click here to enter notes.			
6. Application Processing			
a) Are there established selection criteria? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Agency has centralized intake or standardized local process across local community. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Yes	No	N/A																									
c) Schedule for taking applications? All days or specific days? All times or specific times? Does schedule make it difficult for any population to obtain assistance? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																									
d) Process developed to determine clearly which households are served first? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																									
e) Adequate application forms are used? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																									
f) Selection preferences have been implemented. Comment. Are preferences weighted? Comment. Are the agency's preferences non-discriminatory? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																									
g) Agency maintains waiting lists? Comment. The waiting list identifies all interested applicants and documents the process used to confirm eligibility and program selection. Comment. The Housing Authority Section 8 waiting list is used. Comment. Is there a client prioritizing process used on the waiting list? What are the priorities? Comment. What process is used to verify a client meets a selected priority, if any? Comment.	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>																									
h) Is the correct definition of annual income used? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																									
Notes: Click here to enter notes.																												
7. Case Management																												
a) Describe agency's self-sufficiency component, if required. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																									
Notes: Click here to enter notes.																												
8. Discrimination Complaints and Appeal Procedures																												
a) Are fair housing rights of each applicant or participant covered by agency staff during intake process? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																									
b) Termination of assistance policy consistently applied. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																									
c) Outcome of complaint/appeal process documented. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																									
d) Has the Agency received any discrimination complaints? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																									
Notes: Click here to enter notes.																												
9. Homeless Shelter/Transitional Housing Facilities																												
a) If applicable, are the following subrecipient licenses reviewed by agency? Comment. <table border="0"> <tr> <td>☐☐Certificate of Occupancy Licenses?.</td> <td>Yes <input type="checkbox"/></td> <td>No <input type="checkbox"/></td> <td></td> <td></td> </tr> <tr> <td>☐☐Permit from Fire Marshall Licenses?.</td> <td>Yes <input type="checkbox"/></td> <td>No <input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>☐☐Programmatic Licensure Licenses?.</td> <td>Yes <input type="checkbox"/></td> <td>No <input type="checkbox"/></td> <td></td> <td></td> </tr> <tr> <td colspan="5">(e.g. Substance Abuse, Day Care, etc.)</td> </tr> <tr> <td>☐☐Food Preparation Licenses?.</td> <td>Yes <input type="checkbox"/></td> <td>No <input type="checkbox"/></td> <td></td> <td></td> </tr> </table>	☐☐Certificate of Occupancy Licenses?.	Yes <input type="checkbox"/>	No <input type="checkbox"/>			☐☐Permit from Fire Marshall Licenses?.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	☐☐Programmatic Licensure Licenses?.	Yes <input type="checkbox"/>	No <input type="checkbox"/>			(e.g. Substance Abuse, Day Care, etc.)					☐☐Food Preparation Licenses?.	Yes <input type="checkbox"/>	No <input type="checkbox"/>					
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☐☐Programmatic Licensure Licenses?.	Yes <input type="checkbox"/>	No <input type="checkbox"/>																										
(e.g. Substance Abuse, Day Care, etc.)																												
☐☐Food Preparation Licenses?.	Yes <input type="checkbox"/>	No <input type="checkbox"/>																										
b) Are the facilities in compliance with all codes, general ordinances and laws zoning, health department compliance, etc? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																									

	Yes	No	N/A
c) Is there regular pest control services? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notes: Click here to enter text.			
PROGRAM: HOME TBA			
a) Is the program administered consistent with the approved Work Plan or approved revised Work Plan. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Adequate written program description for the program. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Adequate procedures for making the program description available to the public. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Agency is following targeted population. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) System for ensuring that rents are reasonable by comparing them to similar units. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Clear policies for determining appropriate unit size. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Program guidelines clearly established and communicated to consumers. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Rent payments to landlords made on time. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Procedures to ensure that all applicants get fair consideration for assistance. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) At least 90% of tenant files reviewed have incomes at or below 50% AMI	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
k) Current list of Certified HQS housing inspectors, including date of certification, provided. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notes: Click here to enter text.			
Program: LIRHF			
a) Agency is following targeted population. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notes: Click here to enter notes.			
Program: ESG			
a) How are responsibilities for implementing and managing the ESG program assigned and delegated? enter description and/or staff responsible. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) ESG grantee has a drug-free workplace statement per requirements of 244 CFR 21.200? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Facilities meet basic Habitability Standards to ensure that shelter and housing facilities funded through ESG program are safe, sanitary, and adequately maintained. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Essential services offered through Street Outreach appear to be adequate for ESG program. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have any ESG funds been used to assist projects involving acquisition, demolition, or rehab. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Files are documented to support disbursements of ESG funds for carrying out eligible activities, e.g., rehabilitation, supportive services, operations, or homeless prevention? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Yes	No	N/A
Notes: Click here to enter notes.			
Program: SHAP			
a) If SHAP is used in a manner other than shelter operations, how is homelessness verified and services determined? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Agency using SHAP funds as match for Federal dollars. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notes: Click here to enter notes.			
Program: HSP			
a) Provide documentation indicating the source, amount and service provided with match funds for HSP. Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Are criminal background checks obtained for all staff members working with youth?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notes: Click here to enter notes.			
Program: EHA			
a) Are EHA funds used for EHA eligible activities? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notes: Click here to enter notes.			
Program: CSBG			
a) Do the bylaws state a required tripartite makeup of the board? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the board roster reflect a tripartite board? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Are all the positions filled? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Does the agency conduct a community needs assessment at least once every 3 years? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Does the agency create a community needs assessment report (i.e., an analysis, not just a compilation)? Comment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Are any funds used to serve client needs directly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notes: Click here to enter notes.			

Additional Notes: