This Version of the MSP is currently under review by OMB, which may result in additional edits. While OMB may require further adjustments to the MSP after they have finalized their review (currently undergoing), this document is the final clearance version.

OMB Control No: 0970-0382
Expiration date: TBD

Community Services Block Grant (CSBG)
Model State Plan

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THE PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13)

Public reporting burden for this collection of information is estimated to average 31 hours per response, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.
Section 1
CSBG Administrative Information

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

1.2. Provide the federal fiscal years this plan covers: Year One: 19 Year Two: 20

Lead Agency: Update 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. Information should reflect the responses provided in the Application for Federal Assistance, SF-424M.

Has information in regards to the state lead agency changed since the last submission of the state plan? No

1.2a. Lead agency Oregon Housing and Community Services (OHCS)

1.2b. Cabinet or administrative department of this lead agency
   ○ Other: Housing Stabilization Division

1.2c. Cabinet or Administrative Department Name: Provide the name of the cabinet or administrative department of the CSBG authorized official. Oregon Housing and Community Services – Housing Stabilization Division.

1.2d. Authorized official of the lead agency. The authorized official could be the director, secretary, commissioner etc. as assigned in the designation letter (attached under item 1.3.). The authorized official is the person indicated as authorized representative on the SF-424M. The CSBG authorized official is the Executive Director of the Housing Stabilization Division.

   Name Claire Seguin    Title Executive Director

1.2e. Street Address 725 Summer St NE, Suite B

1.2f. City Salem

1.2g. State OR

1.2h. Zip Code 97301

1.2i. Work Telephone Number and Extension (if applicable) 503-986-6758

1.2j. Fax Number 503-986-6877

1.2k. Email Address Claire.seguin@oregon.gov

1.2l. Lead Agency Website www.oregon.gov/ohcs

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

1.3. Designation Letter: Attach the state’s official CSBG designation letter. A new designation letter is required if the chief executive officer of the state and/or designated agency has changed. See Appendix – Item A: Designation Letter (to be attached at submission)
1.4. **CSBG Point of Contact:** Provide the following information in relation to the designated state CSBG point of contact. The state CSBG point of contact should be the person that will be the main point of contact for CSBG within the state.

Has information regarding to the state point of contact changed since the last submission of the state plan? **Yes**

If yes, provide the date of change and select the fields that have been updated

- ☐ Agency Name
- ☐ Point of Contact, August 2017
- ☐ Street Address
- ☐ City
- ☐ State
- ☐ Zip Code
- ☐ Work Number
- ☐ Fax Number
- ☐ Email Address
- ☐ Website

**1.4a.** Agency Name **Oregon Housing and Community Services (OHCS)**

**1.4b.** Point of Contact Name **Marilyn Miller**

**1.4c.** Street Address **725 Summer St NE, Suite B**

**1.4d.** City **Salem**

**1.4e.** State **OR**

**1.4f.** Zip Code **97301**

**1.4g.** Work Telephone Number **503-986-0971**

**1.4h.** Fax Number **503-986-6877**

**1.4i.** Email Address **marilyn.k.miller@oregon.gov**

**1.4j.** Agency Website **www.oregon.gov/ohcs**

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

There is currently a state Community Action Association within the state. **Yes**

Has information in regards to the state Community Action Association changed since the last submission of the state plan? **No**

If yes, provide the date of change and select the fields that have been updated.

**1.5a.** Agency name **Community Action Partnership of Oregon**

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

- Name **Janet Merrell**
- Title **Executive Director**

**1.5c.** Street Address **350 Mission St SE**

**1.5d.** City **Salem**

**1.5e.** State **OR**

**1.5f.** Zip Code **97302**
1.5g. Telephone Number 503-830-9969
1.5h. Fax Number 503-363-0113
1.5i. Email Address janet.merrell@caporegon.org
1.5j. State Association Website http://caporegon.org/
1.5k. State Association currently serves as the Regional Performance Innovation Consortia (RPIC) lead. Yes

Section 2
State Legislation and Regulation

2.1. **CSBG State Legislation:** State has a statute authorizing CSBG. Yes
2.2. **CSBG State Regulation:** State has regulations for CSBG. Yes
2.3. **Legislation/Regulation Document:** Attach the legislation and/or regulations or provide a hyperlink(s) to the documents indicated under Items 2.1. and/or Item 2.2. http://oregonlaws.org/ors/458.505
2.4. **State Authority:** Select a response for each of the following items about the state statute and/or regulations authorizing CSBG:
   2.4a. **Authorizing Legislation:** State legislature enacts authorizing legislation or amendments to an existing authorizing statute last federal fiscal year. No
   2.4b. **Regulation Amendments:** State established or amended regulations for CSBG last federal fiscal year. No
   2.4c. **Designation:** State statutory or regulatory authority designates the bureau, division, or office in the state government that is to be the state administering agency. Yes
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.

The mission of OHCS is to provide stable and affordable housing and engage leaders to develop integrated statewide policy that addresses poverty and provides opportunity for Oregonians. As the Housing Finance Agency for the state of Oregon, OHCS provides financing and program support to develop and preserve opportunities for quality, affordable housing for Oregonians of low to moderate income. In addition, the OHCS Housing Stabilization Division administers multiple poverty and asset building programs that address emergency situations, such as homelessness, as well as create pathways to self-sufficiency.

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

OHCS has seven 2018 Strategic Goals which support the purpose and intent of CSBG. The Housing Stabilization Division has responsibility for implementing the goal specific to CSBG; prevent and reduce statewide poverty and homelessness. The goal’s intent is to help vulnerable low-income Oregonians become stably housed by serving communities through technical assistance, best practice implementation, educating opinion leaders, advancing research, and improving policy.

In addition to the current strategic goals, OHCS is in the process of developing a Statewide Housing Plan that will provide the following deliverables:

- Clear articulation of the state of housing in Oregon
- Clear articulation of the role of the state and the role of our partners, departments, developers and agencies working to reduce the impacts of poverty on low income people
- Reliable data that allows decision makers to consider impacts and alternatives
- Goals and metrics that can be reached with existing resources
- Clear direction for implementation

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

3.3a. **Analysis of state-level tools -**

- State Performance Indicators and/or National Performance Indicators (NPIs)
- U.S. Census data
- State performance management data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)
- Monitoring Visits/Assessments
3.3b. Analysis of local-level tools -
   - Eligible entity community needs assessments
   - Eligible entity community action plans
   - Public Hearings/Workshops
   - Community Homeless Plans

3.3c. Consultation with -
   - Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)
   - State Association
   - National Association for State Community Services Programs (NASCSP)
   - Community Action Partnership (The Partnership)

3.4. Eligible Entity Involvement

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

OHCS, in consultation with the state association, planned and implemented a specific meeting for the entire CAA network to provide feedback on the development of the state plan. The majority of the CAAs participated in the meeting and all were given the opportunity to provide individual written or verbal feedback to OHCS both during and after the meeting.

Four areas of potential improvement/change were discussed: changes to Organizational Standards; changes to the CSBG allocation formula and use of discretionary funds, state training and TA, and opportunities for improved state linkages and communication. Most of the discussion centered on concerns and specific recommendations to improve the Organizational Standards. While participants expressed an interest in considering changes to the CSBG allocation formula and use of discretionary funds, there was consensus that now was not the time due to uncertain funding. There was agreement to follow-up with the state association to determine next steps in discussing formula changes but no changes were made to the plan at this time.

3.4b. Performance Management Adjustment: Describe how the state has adjusted its State Plan development procedures under this State Plan, as compared to previous plans, in order to 1) encourage eligible entity participation and 2) ensure the State Plan reflects input from eligible entities. Any adjustment should be based on the state's analysis of past performance in these areas, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

Our agency received a score of 40 in the ACSI survey in regards to input and involvement in the State Plan so we altered the way we sought input. Previously we sent out a draft plan for eligible entity input and review. Any input received was incorporated into the draft. The network was then sent notice that the public hearing was being held and they could provide input on the plan in that forum as well.
For this State Plan period, utilizing comments provided in the ACSI survey, we took a more direct approach. We set up a CSBG State Plan discussion meeting to garner agency feedback on topics that were relevant to the network as identified above in the state steps to develop the plan.

3.5.1. Eligible Entity Overall Satisfaction: Provide the state’s target for eligible entity Overall Satisfaction during the performance period. Year One: 62 Year Two: 70
Section 4  
CSBG Hearing Requirements

4.1. **Public Inspection:** Describe the steps taken by the state to disseminate this State Plan to the public for review and comments prior to the public hearing, as required under Section 676(e)(2) of the Act. The State made the plan available for public inspection in multiple ways to ensure the plan was available for review and comment from many, including stakeholders, community members, and the low-income population.

The State Plan was posted to the OHCS website for view prior to the public hearing and was distributed electronically to the CAA Network, the Housing Stability Council, and the CAA State Association. Public Hearing notices were posted on the OHCS website and on a government transparency website, in addition to being sent electronically to the CAA Network, the CAA State Association, and via Constant Contact (the OHCS public listserv).

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

The State Plan and the public hearing notice were both posted two weeks prior to the hearing date. The CAA Network, the State Association, and the public all had access to the State Plan via the OHCS website. Additionally, the Plan was distributed electronically to the Network and State Association as well as via Constant Contact. The public comment period was held open for an additional two weeks after the hearing date.

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

<table>
<thead>
<tr>
<th>Date</th>
<th>Location</th>
<th>Type of Hearing</th>
<th>If a Combined Hearing was held confirm that the public was invited.</th>
</tr>
</thead>
<tbody>
<tr>
<td>July 31, 2018</td>
<td>North Mall Office Building</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>10:00 am – 11:00 am</td>
<td>725 Summer St NE, Room 124B, Salem, OR 97301</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

4.4. Attach supporting documentation or a hyperlink for the public and legislative hearings. See Appendix – Item B: Public Hearing Notice & Minutes (to be attached at submission)
Section 5
CSBG Eligible Entities

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

<table>
<thead>
<tr>
<th>CSBG Eligible Entity</th>
<th>Geographical Service Area</th>
<th>Public or Nonprofit</th>
<th>Type of Entity</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACCESS</td>
<td>Jackson County</td>
<td>Nonprofit</td>
<td>Community Action Agency</td>
</tr>
<tr>
<td>Community Action Organization (CAO)</td>
<td>Washington County</td>
<td>Nonprofit</td>
<td>Community Action Agency</td>
</tr>
<tr>
<td>Community Action Program of East Central Oregon (CAPECO)</td>
<td>Gilliam, Morrow, Umatilla and Wheeler Counties</td>
<td>Nonprofit</td>
<td>Community Action Agency</td>
</tr>
<tr>
<td>Community Action Team (CAT)</td>
<td>Clatsop, Columbia, and Tillamook Counties</td>
<td>Nonprofit</td>
<td>Community Action Agency</td>
</tr>
<tr>
<td>Community Connection of NE Oregon (CCNO)</td>
<td>Baker, Grant, Union, and Wallowa Counties</td>
<td>Nonprofit</td>
<td>Community Action Agency</td>
</tr>
<tr>
<td>Clackamas County Social Services Division (CCSSD)</td>
<td>Clackamas County</td>
<td>Public</td>
<td>Community Action Agency</td>
</tr>
<tr>
<td>Community Services Consortium (CSC)</td>
<td>Linn, Benton, and Lincoln Counties</td>
<td>Public</td>
<td>Community Action Agency</td>
</tr>
<tr>
<td>Community in Action (CINA)</td>
<td>Harney and Malheur Counties</td>
<td>Nonprofit</td>
<td>Community Action Agency</td>
</tr>
<tr>
<td>Klamath Lake Community Action Services (KLCAS)</td>
<td>Klamath and Lake Counties</td>
<td>Nonprofit</td>
<td>Community Action Agency</td>
</tr>
<tr>
<td>Lane County (LC)</td>
<td>Lane County</td>
<td>Public</td>
<td>Community Action Agency</td>
</tr>
<tr>
<td>Mid-Columbia Community Action Council (MCCAC)</td>
<td>Hood River, Sherman, and Wasco Counties</td>
<td>Nonprofit</td>
<td>Community Action Agency</td>
</tr>
<tr>
<td>Multnomah County Department of County Human Services (MULTCO)</td>
<td>Multnomah County</td>
<td>Public</td>
<td>Community Action Agency</td>
</tr>
<tr>
<td>Mid-Willamette Valley Community Action Agency (MWVCAA)</td>
<td>Marion and Polk Counties</td>
<td>Nonprofit</td>
<td>Community Action Agency</td>
</tr>
<tr>
<td>NeighborImpact (NIMPACT)</td>
<td>Deschutes, Crook, and Jefferson Counties</td>
<td>Nonprofit</td>
<td>Community Action Agency</td>
</tr>
<tr>
<td>Oregon Human Development Corporation (OHDC)</td>
<td>Statewide Farmworker Organization</td>
<td>Nonprofit</td>
<td>Migrant or Seasonal Farmworker Organization</td>
</tr>
<tr>
<td>Oregon Coast Community Action Agency (ORCCA)</td>
<td>Coos and Curry Counties</td>
<td>Nonprofit</td>
<td>Community Action Agency</td>
</tr>
<tr>
<td>United Community Action Network (UCAN)</td>
<td>Douglas and Josephine Counties</td>
<td>Nonprofit</td>
<td>Community Action Agency</td>
</tr>
<tr>
<td>Yamhill Community Action Partnership (YCAP)</td>
<td>Yamhill County</td>
<td>Nonprofit</td>
<td>Community Action Agency</td>
</tr>
</tbody>
</table>

5.2. Total number of CSBG eligible entities: 18
5.3. **Changes to Eligible Entities List:** Within the tables below, describe any changes that have occurred to the Eligible Entities within the state since the last federal fiscal Year (FFY), as applicable. **No Changes to Eligible Entities List**
Section 6
Organizational Standards for Eligible Entities

Note: Reference IM 138, State Establishment of Organizational Standards for CSBG Eligible Entities, for more information on Organizational Standards. Click HERE for IM 138.

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

COE CSBG Organizational Standards

6.1a. Modified Organizational Standards: In the case that the state is requesting to use modified COE-developed organizational standards, provide the proposed modification for the FFY of this planning period including the rationale.

The State will continue to use the merge of Standard 1.2 and 3.3, which included modified language to ensure the key components of both were captured, as approved in the last State Plan. The state will also continue to use the modification of Standard 2.2 as approved in the last State Plan in which the Standard was deemed optional for agencies with operating budgets of under $15 million. Additionally, based upon input gathered from the CAA Network and State Association as well as responses in the ACSI survey, the State would like to modify additional Standards as follows:

1. Standard 5.9 will be modified to state: The Organization’s governing board receives programmatic reports at each regular board meeting, or at minimum, on a quarterly basis.

2. Standard 7.1 will be modified and will now state: The organization has written personnel policies that have been reviewed by an attorney or an accredited HR professional within the past five years. The reason for this change is that this standard places an undue burden on smaller agencies that have limited resources.

3. Standards 7.4 and 7.5 will be merged and will now state: The governing board conducts a performance appraisal of the CEO/Executive Director, and reviews and approves their compensation, within every calendar year. The reason for this change is that both actions typically happen at the same board meeting and this will cut down on duplication.

6.2. Implementation: Check the box that best describes how the state officially adopted 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.

Contracts with Eligible Entities
6.3. **Organizational Standards Assessment:** Describe how the state will assess eligible entities against organizational standards this federal fiscal year(s).
   - **Self-assessment** (with validation by the state or state-authorized third party)
   - **Regular, on-site CSBG monitoring**

6.3a. **Assessment Process:** Describe the planned assessment process.

CSBG eligible entities submit an annual assessment utilizing an online assessment system. The system has been stylized to work with Oregon's assessment processes and Oregon-specific state guidance has been incorporated. Eligible entities will be required to fill out a Technical Assistance Plan (TAP) for all unmet standards. The TAP is integrated into the online assessment system and will be submitted, tracked and approved through the system. The TAP will be closed once the standard is met.

This is the third year of the implementation process for the Organizational Standards and agencies will be submitting a full assessment. We will continue to improve on the work done by the CSBG work group in early 2017, which worked to come up with ways to reduce the administrative burden that the Organizational Standards place on agencies. To that end we will continue to provide technical training and assistance and work to streamline duplicative processes.

Additionally, enhancements have been made to the assessment software system that we use that will make the process more user-friendly and efficient. We have also created State Guidance documents for the standards that provide clear instruction on what each standard requires. The State Guidance documents can be accessed from within the assessment software as well as the OHCS CSBG website.

6.4. **Eligible Entity Exemptions:** Will the state make exceptions in applying the organizational standards for certain eligible entities due to special circumstances or organizational characteristics (as described in IM 138)? Yes

6.4a. Provide the specific eligible entities the state will exempt from meeting organizational standards, and provide a description and a justification for each exemption. Total Number of Exempt Entities: 1

<table>
<thead>
<tr>
<th>CSBG Eligible Entity</th>
<th>Exemption Provided</th>
<th>Description/Justification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oregon Human Development Corporation (OHDC)</td>
<td></td>
<td>We are allowing OHDC to submit a modified Community Needs Assessment. Due to the nature of their work (they serve migrant farmworkers and their families), and the fact that they are spread throughout the entire state, a traditional needs assessment is not feasible. Standard 3.2 will be waived and Standard 3.4 will be modified to state: The community assessment includes key findings on the causes and conditions</td>
</tr>
</tbody>
</table>
6.5. **Performance Target:** Provide the percentage of eligible entities that the state expects to meet all the state-adopted organizational standards for the FFY(s) of this planning period. **Year One 50% Year Two 75%**
SECTION 7
State Use of Funds

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

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

7.1a. **Formula Description:** Describe the current practice for allocating CSBG funds to eligible entities. *Current and historical practice is to utilize a base fund plus need based formula. The formula utilizes poverty and DHS SNAP data for the calculation.*

7.1b. **Statute:** Does a state statutory or regulatory authority specify the formula for allocating “not less than 90 percent” funds among eligible entities? **Yes**

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

   Year One 90%  Year Two 90%

Below are the anticipated allocation amounts for Federal Fiscal Year (FFY) 2019 and FFY 2020. These amounts are based on receiving the same annual allocation as received in FFY 2018.

<table>
<thead>
<tr>
<th>CSBG Eligible Entity</th>
<th>Funding Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACCESS</td>
<td>$296,188</td>
</tr>
<tr>
<td>CAO</td>
<td>$408,986</td>
</tr>
<tr>
<td>CAPECO</td>
<td>$150,000</td>
</tr>
<tr>
<td>CAT</td>
<td>$150,000</td>
</tr>
<tr>
<td>CCNO</td>
<td>$150,000</td>
</tr>
<tr>
<td>CCSSD</td>
<td>$269,079</td>
</tr>
<tr>
<td>CSC</td>
<td>$353,871</td>
</tr>
<tr>
<td>CINA</td>
<td>$150,000</td>
</tr>
<tr>
<td>KLCAS</td>
<td>$150,000</td>
</tr>
<tr>
<td>LC</td>
<td>$464,614</td>
</tr>
<tr>
<td>MCCAC</td>
<td>$150,000</td>
</tr>
<tr>
<td>MULTCO</td>
<td>$840,798</td>
</tr>
<tr>
<td>MWVCAA</td>
<td>$510,404</td>
</tr>
<tr>
<td>NIMPACT</td>
<td>$292,751</td>
</tr>
<tr>
<td>OHDC</td>
<td>$150,000</td>
</tr>
<tr>
<td>ORCCA</td>
<td>$150,000</td>
</tr>
<tr>
<td>UCAN</td>
<td>$326,182</td>
</tr>
<tr>
<td>YCAP</td>
<td>$150,000</td>
</tr>
</tbody>
</table>
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 Program 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 Program 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

<table>
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<tr>
<td>ORCCA</td>
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</tr>
<tr>
<td>UCAN</td>
<td>$326,182</td>
</tr>
<tr>
<td>YCAP</td>
<td>$150,000</td>
</tr>
</tbody>
</table>
agency is electronically filed with all other CSBG documents on the agency’s server.

In the event of unexpected increases or decreases, OHCS, in agreements made with the CAA network, takes the following approaches:

a) Floor amount is $150,000. If there is an increase in future CSBG funding, the total increase amount, beyond the prior year’s allocation, will be allocated equally to all agencies, unless the increase is above 6%. In cases where the increase is greater than 6%, the first 6% will be distributed equally among all agencies, while the remaining amount above 6% will be allocated to the formula agencies by formula percentage.

b) If there is a decrease in future CSBG funding, and a formula agency sees a decrease higher than 10% of the year’s prior allocation, discretionary funds may be utilized to mitigate the decrease and make up the difference. Floor agencies will remain at $150,000 and not see a decrease.

c) In the event that the discretionary resources are not sufficient to cover all increases over 10%, the issue will be brought to the CSBG Workgroup for discussion and recommendations consideration.

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

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

Notices of Allocations (NOAs) are not allocated to the eligible entities until January. CSBG funds are issued and expended on the calendar year. 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 a 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.

At times, the allocation 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 OHCS is expedient in issuing the CSBG funds, once an additional agreement has been met.

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

7.5. **Performance Management Adjustment:** Describe the state’s strategy for improving grant and/or contract administration procedures under this State Plan as compared to past plans. Any improvements should be based on analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any improvements, provide further detail.

Based on the improvements to the Master Grant Agreement contracting process this
past biennium, OHCS is not planning any new contract administration procedures. As part of the ongoing process to develop a State Housing Plan, strategies will be developed for integrating performance-based contracting into the Master Grant Agreement but will not be identified in time for the submission of the CSBG State Plan.

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

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

Year One 5%  Year Two 5%

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

Year One 18  Year Two 18

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

Year One 2.5  Year Two 2.5

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

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

If yes, provide the allocated percentage and describe the use of the remainder/discretionary funds in the table below. Year One 5%  Year Two 5%

<table>
<thead>
<tr>
<th>Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)</th>
<th>Planned $</th>
<th>Brief Description of Services and/or Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>7.9a. Training/technical assistance to eligible entities</td>
<td>$120,000</td>
<td>CAPO Workplan</td>
</tr>
<tr>
<td>7.9b. Coordination of State-operated programs and/or local programs</td>
<td>N/A</td>
<td>These planned services/activities will be described in State Plan Section 9, State Linkages and Communication</td>
</tr>
<tr>
<td>7.9c. Statewide coordination and communication among eligible entities</td>
<td>$70,000</td>
<td>CAPO Workplan</td>
</tr>
<tr>
<td>7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>7.9e. Asset-building programs</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>7.9f. Innovation programs/activities by eligible entities or other neighborhood group</td>
<td>$55,000</td>
<td>CAPO/Futures Project</td>
</tr>
<tr>
<td>7.9g. State charity tax credits</td>
<td>$60,000</td>
<td>Organizational Standards software, support to floor agencies</td>
</tr>
<tr>
<td>Totals</td>
<td>$305,000</td>
<td></td>
</tr>
</tbody>
</table>
### Use of Remainder/Discretionary Funds – Year Two (subject to change based upon need)

<table>
<thead>
<tr>
<th>Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)</th>
<th>Planned $</th>
<th>Brief Description of Services and/or Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>7.9a. Training/technical assistance to eligible entities</td>
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</tr>
<tr>
<td>7.9e. Asset-building programs</td>
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<td>$55,000</td>
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</tr>
<tr>
<td>Totals</td>
<td>$305,000</td>
<td></td>
</tr>
</tbody>
</table>

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

- The state partially carries out some activities
- CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds) 9
- State Community Action association
- Regional CSBG technical assistance provider(s)
- National technical assistance provider(s)

### 7.11. Individual consultant(s)/Performance Management Adjustment:
Describe any adjustments the state will make to the use of remainder/discretionary funds under this State Plan as compared to past plans? Any adjustment should be based on the state’s analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

State usage of the discretionary funds is consistent with past years, in which a majority of the funding is utilized to fund Training and Technical Assistance for eligible entities and support of the state association. A secondary usage that has emerged is mitigating funding reductions within the floor agencies’ funding cycle, in addition to mitigating a percentage decrease over 10% for any qualifying formula agency. In advance of the 2017 funding cycle, OHCS and the CSBG Workgroup determined policy to ensure the
mitigating funds for floor agencies are distributed at the start of the funding year. OHCS continued with this practice in the 2018 fiscal year. The third usage will continue to be contracting with the CSG software company, which enables efficient review and tracking of the Organizational Standards.
SECTION 8
State Training and Technical Assistance

8.1. **Training and Technical Assistance Plan**: Describe the state’s plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan by completing the table below. 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 7.9a., Use of Remainder/Discretionary Funds.) **Note**: This information is associated with State Accountability Measure 3Sc and pre-populates the Annual Report, Module 1, Table F.1.

### Training and Technical Assistance – Year One

<table>
<thead>
<tr>
<th>Planned Timeframe</th>
<th>Training, Technical Assistance, or Both</th>
<th>Topic</th>
<th>Brief Description of “Other”</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dropdown Options:</td>
<td>Toggle Options:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Ongoing/Multiple Quarters</td>
<td>• Both</td>
<td>Dropdown Options:</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Fiscal</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Organizational Standards – General</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Organizational Standards – for eligible entities with unmet TAPs or QIPs</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• ROMA &amp; HMIS Data Collection and Reporting – Annual Report</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Family Development</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Community Assessment</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Strategic Planning</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Coordinated Entry</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Housing First</td>
<td></td>
</tr>
</tbody>
</table>

### Training and Technical Assistance – Year Two

<table>
<thead>
<tr>
<th>Planned Timeframe</th>
<th>Training, Technical Assistance, or Both</th>
<th>Topic</th>
<th>Brief Description of “Other”</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dropdown Options:</td>
<td>Toggle Options:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Ongoing/Multiple Quarters</td>
<td>• Both</td>
<td>Dropdown Options:</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>TBD as per T/TA survey sent out annually by CAPO</td>
<td></td>
</tr>
</tbody>
</table>

**8.1a. Training and Technical Assistance Budget**: The planned budget for the training and technical assistance plan (as indicated in the Remainder/Discretionary Funds table in item 7.9):

- Year One: $120,000
- Year Two: $120,000

**8.1b. Training and Technical Assistance Collaboration**: Describe how the state will collaborate with the State Association and other stakeholders in the planning and delivery of training and technical assistance.

**OHCS partners closely with our community action state association, Community Action Partnership of Oregon (CAPO), to provide training and technical assistance to the community action agency network. Annually, CAPO surveys the CAA network to determine agency training needs. Survey results, monitoring results, and performance expectations inform the annual CAPO work plan with OHCS.**
8.2. TAPs and QIPs: Does the state have Technical Assistance Plans (TAPs) and/or Quality Improvement Plans (QIPs) in place for all eligible entities with unmet organizational standards, if appropriate? Yes

Note: 8.2 is associated with State Accountability Measure 6Sb. QIPs are described in Section 678C(a)(4) of the CSBG Act. If the state, according to their corrective action procedures, does not plan to put a QIP in place for an eligible entity with one or more unmet organizational standards, the state should put a TAP in place to support the entity in meeting the standard(s).

8.2a. Address Unmet Organizational Standards: Describe the state’s plan to provide T/TA to eligible entities to ensure they address unmet Organizational Standards.

OHCS works closely with the community action state association to provide training on topics that multiple agencies struggle with in relation to the Organizational Standards. For example, a training on how to use a community needs assessment in the strategic planning process was offered due to a number of agencies who had unmet standards in relation to those two categories. Additionally, OHCS staff offers one-on-one trainings upon request and have traveled out to numerous agencies to offer assistance.

8.3. Training and Technical Assistance Organizations: 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.)

- State Community Action Association
- Regional CSBG technical assistance provider(s)
- National technical assistance provider(s)
- Individual consultant(s)
- Other - OHCS staff

8.4. Performance Management Adjustment: Describe adjustments the state made to the training and technical assistance plan under this State Plan as compared to past plans. Any adjustment should be based on the state’s analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

OHCS will continue to allow CAPO the flexibility to design a training calendar based on agency need. To that end, CAPO conducts an annual survey to eligible entities asking for their training needs. Additionally, the state lead provides input on training needs garnered from reviewing Organizational Standards assessments. The state will continue to collaborate with CAPO to provide more hands-on, personalized training to assist agencies with Organizational Standards and Technical Assistance Plans (TAPS).
SECTION 9
State Linkages and Communication

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

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

In addition to the internal coordination between OHCS administered poverty programs (i.e. LIHEAP, Weatherization, Housing, IDA), linkages will continue and be further strengthened with the TANF, public health, child welfare, Head Start, and WIOA state offices and departments. OHCS has Integrator staff specifically assigned to work at both the state, regional and local level to identify opportunities for system alignment, coordination, innovation and resource sharing centered on affordable housing and poverty.

Based on CAA network feedback, we will also explore ways in which we can strengthen our partnership with WIOA to better link CAA clients with workforce training and support. Additionally, OHCS is pursuing opportunities with Housing Authorities to increase the number of mainstream vouchers available to low income Oregonians. Lastly, OHCS is co-leading a statewide initiative to end veteran homelessness with the Dept. of Veterans Affairs.

- 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 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 intends 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 Section 676(b)(5) – (6)).

The statewide network of CAAs is the statewide system for delivery of anti-poverty services, including the Community Services Block Grant (CSBG). CAAs work extensively with governmental entities, nonprofits, mental and physical health providers, schools, public safety providers, and others to design, implement, and deliver programs and services to low-income individuals and families.

Community Action Agencies provide information and referrals to the public and are key participants in their respective Continuums of Care, which enables them to be a community hub for linking low-income people to mainstream supportive services. CAAs maintain partnerships with systems of care to ensure coordination, and to avoid duplication of services.

The Department of Human Services (DHS) uses TANF funds to address crisis and short-term needs that put low-income families with children at risk of becoming homeless. OHCS partners with DHS in this effort, and works to strengthen and expand this program as well as replicate similar partnerships with other state departments.

Oregon Continuums of Care (CoC) continue to enhance their coordinated entry processes. The assessment tool used as part of this process works to highlight both visible and hidden barriers. Community partnerships across all sectors are critical to a healthy Coordinated Entry system. Reaching across disciplines increases the possibility of touching upon a cross-section of basic need and life skills support, substance and or alcohol abuse treatment, anger management, counseling, and other areas that may help a person maintain housing stability. 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. Additionally, OHCS requires sub-grantee participation in their local Coordinated Entry system.
9.3. Eligible Entity Linkages and Coordination

9.3a. State Assurance of Eligible Entity Linkages and Coordination: Describe how the state will assure that eligible entities will 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)).

OHCS requires eligible entities to complete a Community Action Plan application as part of the Master Grant Agreement process. Within this application, eligible entities are required to report on the categories listed below. This allows OHCS to monitor local linkages and strategies as well as identify opportunities for state intervention to address linkage barriers.

Required service categories include:

- Identified top 5 county/service area needs and gaps
- Strategies to address needs and gaps including identification of key partnerships; identification of poverty populations, services provided and CSBG staffing
- Linkages and primary referral organizations
- Plan for transitioning clients out of poverty
- Additional inter-agency programs and services provided and
- Primary funding and service coordination partnerships

In addition to the Master Grant Agreement process detailed above, eligible entities are required to report annually on their partnerships and linkages in the CSBG Annual Report.

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.

As described previously, the required CSBG plan requires identification of local linkages, primary coordinating partnerships and strategies to address community identified needs and gaps. OHCS reviews the plans to ensure appropriate coordination is happening as documented through existing MOU/service agreements, coordinated entry and assessment, joint case planning, convening of partners to provide wrap around services, resource sharing and other locally appropriate linkage examples.

9.4. Workforce Innovation and Opportunity Act (WIOA) Employment and Training Activities: Does the state intend to include CSBG employment and training activities as part of a WIOA Combined State Plan, as allowed under the Workforce Innovation and Opportunity Act (as required by the assurance under Section 676(b)(5) of the CSBG Act)?

No
9.4a. **WIOA Combined Plan**: If the state selected yes under Item 9.4, provide the CSBG-specific information included in the state’s WIOA Combined Plan. This information includes a description of how the state and the eligible entities will coordinate the provision of employment and training activities through statewide and local WIOA workforce development systems. This information may also include examples of innovative employment and training programs and activities conducted by community action agencies or other neighborhood-based organizations as part of a community antipoverty strategy.

9.4b. **Employment and Training Activities**: If the state selected no under Item 9.4, describe the coordination of employment and training activities, as defined in Section 3 of WIOA, by the state and by eligible entities providing activities through the WIOA system.

Under the Governor’s Executive Order No. 11-12, Oregon has established an infrastructure in which State resources are strategically aligned throughout Oregon to accomplish community and economic goals through Regional Solutions Advisory Committees, Centers and Teams. This alignment serves and supports the unique economic and community development needs of each region and the regional boundaries are strategically aligned with the 11 federally designated Economic Development Districts.

Regional Solutions Centers are located throughout Oregon to align investments in support of the priorities. Five core state agencies – the departments of transportation (ODOT), land conservation and development (DLCD), environmental quality (DEQ), housing and community services (OHCS) and business development (OBDD/Business Oregon) – co-locate their regional staff in these centers to form Regional Solutions Teams (RSTs). The Governor’s Office provides coordination for these teams. Regional Solutions Teams work collaboratively on projects to address priorities and they serve as quick responders to emerging issues. This community-based strategy has been very well received by both local governments and the business community.

OHCS utilizes its involvement in Regional Solutions work to identify opportunities for workforce affordable housing that benefits low income households. Additionally, OHCS will work with grantees to determine the best way in which to strengthen linkages with workforce employment and training activities in areas where CAAs have identified barriers to utilization and coordination.

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.

**OHCS has the advantage of administering Low-Income Home Energy Assistance, Weatherization and Emergency Housing under the same Division which promotes on-**
going coordination at both the state and local level. The same Master Grant Agreement (MGA) contracting process is utilized for all three program areas and CAAs are encouraged and in some instance required to link these services to ensure the most cost effective delivery of services to clients.

9.6. **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.

OHCS assures local coordination and partnerships through its contracting process as described previously. The community action plan requires grantees to identify partnerships including those with faith-based organizations, nonprofit organizations and other community groups. Grantees are also required to submit partnership information through the Annual Report which is reviewed by CSBG state staff. Additionally, grantees must identify organizations with whom they subcontract for OHCS funded services. Review of grantee community assessments also provides a view of the kind of partnerships that grantees have developed locally and regionally. Review of client service data provides the opportunity to see who is being served with an equity lens creating the opportunity for OHCS staff to assist where necessary in providing TA to create partnerships with key cultural communities and service/advocacy organizations.

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.

Oregon’s CAAs solicit and rely upon multiple public and private funding resources ranging from private foundations to public funders including OHCS. Oregon’s legislature has mandated the Community Action Agency network as the preferred delivery system to provide OHCS homeless services creating a strong coordination with CSBG. According to the most recent CSBG Annual Report, eligible entities received $35,471,622 in local public resources and $55,675,069 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 contract with OHCS. The CAA network also has representation on the Housing Stability Council which is the
department’s governing policy body.

In addition to mobilizing community action agencies across the state of Oregon, CAPO is the primary technical and training assistance provider utilized by OHCS 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 and community action related newsletters to its member network.

OHCS provides funding to assist CAPO in working regionally with other states, including Washington and Idaho. Through these partnerships, CAPO is able to coordinate special projects like the Futures Project. The Futures Project’s goal is to develop key indicators to demonstrate the impact Community Action Agencies have on stabilizing and equipping low income individuals to exit poverty, as well as improving data collection and analysis to better target programs to reach their intended outcomes.

9.9. **Communication with Eligible Entities and the State Community Action Association:** In the table below, detail how the state intends to communicate with eligible entities, the State Community Action Association, and other partners identified under this State Plan on the topics listed below.

For any topic that is not applicable, select *Not Applicable* under Expected Frequency.
9.10. Feedback to Eligible Entities and State Community Action Association: Describe how the state will provide information to local entities and State Community Action Associations regarding performance on State Accountability Measures.

In order to respond appropriately to State Accountability Measure 55(iii), OHCS will utilize the Communication Agreement plan to provide feedback to local entities in cases where the feedback is statewide and generalized. In instances where the feedback is isolated to individual agencies, OHCS will initiate direct contact with the community action agency (ies) within 60 days. However, to honor our commitment to CAPO as an advisory body, and to take advantage of their expertise, OHCS will notify CAPO of impending communications. Regarding the state’s performance on state accountability measures, the state will also coordinate with CAPO to share and discuss relevant results and feedback.

9.11. Performance Management Adjustment: Describe any adjustments the state made to the Communication Plan in this State Plan as compared to past plans. Any adjustment should be based on the state’s analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as

<table>
<thead>
<tr>
<th>Communication Plan</th>
<th>Subject Matter</th>
<th>Expected Frequency</th>
<th>Format</th>
</tr>
</thead>
<tbody>
<tr>
<td>Upcoming Public and/or Legislative Hearings</td>
<td>As Needed</td>
<td>Newsletters, Email, Website, Public Notice</td>
<td></td>
</tr>
<tr>
<td>State Plan Development</td>
<td>As Needed</td>
<td>Meetings/Presentations, Email, 1:1, Public Notice</td>
<td></td>
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<tr>
<td>Organizational Standards Progress</td>
<td>As Needed</td>
<td>Email, Website, Webinar, Phone Calls, 1:1, Meetings/Presentations</td>
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</tr>
<tr>
<td>State Accountability Measures Progress</td>
<td>As Needed</td>
<td>Email</td>
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<tr>
<td>Community Needs Assessments/Community Action Plans</td>
<td>As Needed</td>
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<tr>
<td>State Monitoring Plans and Policies</td>
<td>As Needed</td>
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<td>Training and Technical Assistance (T/TA) Plans</td>
<td>As Needed</td>
<td>Email, Website, Meetings/Presentations, 1:1</td>
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<tr>
<td>ROMA and Performance Management</td>
<td>As Needed</td>
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<tr>
<td>State Interagency Coordination</td>
<td>As Needed</td>
<td>Email, Newsletters</td>
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<tr>
<td>CSBG Legislative/Programmatic Updates</td>
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</tr>
<tr>
<td>Tripartite Board Requirements</td>
<td>As Needed</td>
<td>Email, Website</td>
<td></td>
</tr>
</tbody>
</table>
the public hearing. If the state is not making any adjustments, provide further detail

No adjustment is being made. The Communication Plan that has been developed has proven effective for OHCS communications with CAPO and the CAA Network. This plan is utilized often and OHCS and partners will continue to use it to guide our communications.

In response to feedback received from the ACSI Survey and the MGA Surveys, the state has made concerted efforts to engage the CAA Network more frequently to communicate regular program updates, particularly in topics of homeless programming and data collection. This has resulted in regular in-person meetings with CAA program staff. During these meetings, staff share updates, answer questions and provide networking opportunities. This has been well received and will continue as a regular practice to increase communication, transparency and partnership.
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.

This is an estimated schedule to assist states in planning. States may indicate “no review” for entities the state does not plan to monitor in the performance period.

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<tr>
<th>Monitoring Schedule - Year One</th>
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<tr>
<td><strong>CSBG Eligible Entity</strong></td>
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<td>ORCCA</td>
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<td>KLCAS</td>
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<td>NIMPACT</td>
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<td>CSC</td>
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<th>Monitoring Schedule - Year Two</th>
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<td><strong>CSBG Eligible Entity</strong></td>
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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 Guide (to be attached at submission)

10.3. Initial Monitoring Reports: According to the state’s procedures, by how many calendar days must the state disseminate initial monitoring reports to local entities? 60

Note: This item is associated with State Accountability Measure 4Sa(ii) and may pre-populate the state’s annual report form.
Corrective Action, Termination and Reduction of Funding and Assurance Requirements (Section 678C of the Act)

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

10.4a. Closing Findings Procedures: If no, describe state procedures for addressing eligible entity findings/deficiencies, and the documenting closure of findings.

10.5. Quality Improvement Plans (QIPs): Provide the number of eligible entities currently on QIPs, if applicable. 0

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?

In the event a community action agency has serious deficiencies to be addressed through a Quality Improvement Plan, the state will draft a report, within 30 days of the approval of the QIP, and submit to the Office of Community Services coordinator assigned to OHCS. This report will include: agency name, listed deficiencies, timeframe for improvement and approved action plan.

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

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

10.8. Eligible Entity Designation: Do the state CSBG statute and/or regulations provide for the designation of new eligible entities? Yes

10.8a. New Designation Citation: If yes, provide the citation(s) of the law and/or regulation. OAR 813-230-0010

10.8 b. New Designation Procedures: If no, describe state procedures for the designation of new eligible entities and how the procedures were made available to eligible entities and the public.

10.9. Eligible Entity Termination: Do state CSBG statute and/or regulations provide for termination of eligible entities? Yes

10.9 a. Termination Citation: If yes, provide the citation(s) of the law and/or regulation. OAR 813-230-0020

10.9 b. Termination Procedures: If no, describe state procedures for termination of new eligible entities and how the procedures were made available to eligible entities and the public.
10.10. Eligible Entity Re-Designation: Do the state CSBG statute and/or regulations provide for re-designation of an existing eligible entity? Yes

10.10 a. Re-Designation Citation: If yes, provide the citation(s) of the law and/or regulation. OAR 813-230-0010

10.10 b. Re-Designation Procedures: If no, describe state procedures for re-designation of existing eligible entities and how the procedures were made available to eligible entities and the public.

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 with 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.

When an audit finding in the grantee’s 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 grantee action to repay disallowed costs, make the 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 grantee, including auditor assurance related to the documentation. The management decision should describe any appeal process available to the grantee. 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.

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

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

10.14. Performance Management Adjustment: Describe any adjustments the state made to
monitoring procedures in this State Plan as compared to past plans? Any adjustment should be based on the state’s analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

**OHCS is not making any significant adjustments to the monitoring process or procedures.** Improvements that were identified in FFY 2017 continue to be applicable including the reduction in duplicate review and monitoring requests and closer alignment between program and fiscal monitoring. The monitoring cycle continues to include: the Master Grant Agreement contracting process inclusive of the Community Action Plan application; program and fiscal onsite reviews and the organizational standards assessment.

**Note:** This item is associated with State Accountability Measure 4Sb and may pre-populate the state’s annual report form.
SECTION 11
Eligible Entity Tripartite Board

11.1. **Tripartite Board Verification:** Verify which of the following measures are taken to ensure that the state verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B of the CSBG Act.
   - Organizational Standards Assessment
   - Monitoring
   - Review copies of Board meeting minutes
   - Track Board vacancies/composition

11.2. **Tripartite Board Updates:** Provide how often the state requires eligible entities (which are not on TAPs or QIPs) to provide updates regarding their Tripartite Boards. This includes but is not limited to copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc.
   - Annually
   - Semiannually

11.3. **Tripartite Board Representation Assurance:** Describe how the states will verify that eligible entities have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entity’s Tripartite Board as required by the assurance under Section 676(b)(10) of the CSBG Act.

The 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. With the implementation of Organizational Standards, agencies are monitored for organizational operations and practices annually. Within these instances, agencies must submit the following for review:

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

11.4 a. 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**: Provide the income eligibility threshold for services in the state.

  o 125% of the HHS poverty line

12.1 a. 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. Within the Master Grant Agreement process and Community Action Plan application, each eligible entity is required to report how often they recertify a participant’s income (quarterly, annually, or bi-annually).

12.2. **Income Eligibility for General/Short Term Services**: Describe how the state ensures eligible entities generally verify income eligibility for those services with limited in-take procedures (where individual income verification is not possible or practical). 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 program compliance monitoring staff.
12.3. Community-targeted Services: Describe how the state ensures eligible entities’ services target and benefit low-income communities for those services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations).

The state ensures eligible entities’ community-targeted services benefit low-income communities through the review of:

- Master Grant Agreement
- Community Action Agency application
- Community Needs Assessment
- National Performance Indicators
- ROMA results of CSBG Annual Report

SECTION 13
Results Oriented Management and Accountability (ROMA) System

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

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

  o The Results Oriented Management and Accountability (ROMA) System

13.1 a. ROMA Description: If ROMA was chosen in Item 13.1, 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) Annual submission of the CSBG Annual Report, by date determined by OHCS.

Prior to the start of each CSBG Annual Report 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.
13.1 b. Alternative System Description: If an alternative system was chosen in Item 13.1, describe the system the state will use for performance measurement.

13.2. Outcome Measures: Indicate and describe the outcome measures the state will use to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization, as required under Section 676(b)(12) of the CSBG Act.

Eligible entities agree to participate in ROMA and report NPIs as part of the Master Grant Agreement process. In addition to the NPIs required as part of the CSBG Annual Report, OHCS is working in collaboration with the state association, under the Theory of Change project, in developing additional performance indicators that best represent the local work done in communities across Oregon, including the indicators required by statute.

- NPIs and others

13.3. Eligible Entity Support: Describe how the state supports the eligible entities in using ROMA or an alternative performance management system.

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 2-3 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 Annual Report 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 Annual Report.

With the release of ROMA: Next Gen, CAPO and OHCS will work together to determine additional training needs and design of new training materials to address the ROMA changes, including the ROMA Implementer training, designed to ensure all agencies have a designated staff member with the responsibility and skill to assume ROMA responsibilities within an agency.

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

13.4. Eligible Entity Use of Data: Describe how the state plans to validate that the eligible entities are using data to improve service delivery.

Agencies are required to submit the CSBG Annual Report each year, in addition to informing OHCS, during the Master Grant Agreement process and Community Action Plan application, of the presence of a ROMA trainer on staff and the ROMA expenditure categories under which their CSBG funds will be utilized.

Within the Community Action Plan application, agencies are required to identify, when reporting services and strategies, the coordinating National Performance Indicators. This information provides OHCS the means to analyze and review the
correlations between data collection and services provided.

In FFY2017, OHCS provided funding to the state association to establish an HMIS User Group. The goal of this group was to provide targeted training and technical assistance on data collection to rural agencies with limited capacity. The state also reviewed the results of each agency’s Community Needs Assessment to see the presence of data and how it is used to determine service delivery needs and target populations. The attention brought to HMIS at the state level led to the development of an annual HMIS user conference sponsored by OHCS, CAPO, and four of the seven Oregon Continuums of Care. The first conference was held in April 2018. The next is set for May 2019.

Community Action Plans and Needs Assessments

13.5. **Community Action Plan:** Describe how the state will secure a Community Action Plan from each eligible entity, as a condition of receipt of CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act.

Eligible entities are required to submit a CSBG Community Action Plan application as part of the Master Grant Agreement Process. Within this application, agencies are required to submit information detailing their service area and poverty rates, strategies to address needs and gaps of services as determined by their most recent community needs, assessments, plans to transition out of poverty and linkages, in addition to further data that illustrates their plan to utilize CSBG funds to address poverty in their community.

13.6. **Community Needs Assessment:** Describe how the state will assure that each eligible entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity’s Community Action Plan, as required by Section 676(b)(11) of the CSBG Act.

Eligible entities are required to submit a CSBG Community Action Plan application as part of the Master Grant Agreement Process. Within this application, agencies are required to submit information detailing their service area and poverty rates. In addition, agencies must report their Top 5 Needs and Top 5 Service Gaps, as discovered through the community needs assessment process. Agencies must also address the strategies they will take to address the needs and gaps, as well as any coordinating partners involved in those efforts.

Annually, the agencies must also submit for review a community needs assessment as part of the Organizational Standards Assessment process. Within this process, agencies’ assessments will be reviewed for process, inclusion, methodology and content. An agency that fails to meet the standards for community needs assessments will be required to develop an action plan as part of a technical Assistance Plan.
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

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

(A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals--

(i) to remove obstacles and solve problems that block the achievement of self-sufficiency (particularly for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);

(ii) to secure and retain meaningful employment;

(iii) to attain an adequate education with particular attention toward improving literacy skills of the low-income families in the community, which may include family literacy initiatives;

(iv) to make better use of available income;

(v) to obtain and maintain adequate housing and a suitable living environment;

(vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent individual and family needs;

(vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to –

(I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and

(II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;
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.

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 are required to report on services to youth through the CSBG Annual Report and identify and address the needs of youth in their communities through their comprehensive community needs assessments. Community action agencies are required by CSBG Statute to conduct a community needs assessment every three years to determine the top service needs in their community. Assessments are reviewed during the Organizational Standards Assessment process, as well as the Master Grant Agreement and Community Action Plan application process. Within the application, agencies must report on the top needs and gaps in services in their community, as well as the strategies to address those needs. This provides the means for the OHCS CSBG analyst to review agencies’ services and whether they are addressing needs, including needs of youth, through either the agency’s services or a subrecipient to the agency. In 2017, Oregon CAAs utilized $118,577 of CSBG Funds to support youth-based activities.

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 Annual Report. Strategies to address needs
and gaps in services, as well as coordinating partners to do so, are required to be reported by agencies in the Master Grant Agreement process.

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

14.3 a. 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 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 ; Rent Guarantee Program; Wildfire Fund; Elderly Rental Assistance 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, 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**

14.3 c. 676(b)(3)(C) Describe how funds made available through grants made under 675C(a) will be coordinated with other public and private resources.”
Eligible Entity Innovative Community and Neighborhood Initiatives, Including Fatherhood/Parental Responsibility

14.3d. 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 eligible entity usage of CSBG funds to develop innovative community and neighborhood-based initiatives. Oregon eligible entities currently devote a percentage of CSBG funds to providing innovative services to special populations, such as youth and seniors. Additionally, OHCS uses discretionary funds to support the state association’s delivery of innovation-based workshops and conferences.

Eligible Entity Emergency Food and Nutrition Services

14.4. 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 Community Action Plan application 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. In 2017, agencies utilized $721,883 of CSBG funds to provide emergency services in their communities.

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

14.5. 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.”

[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. 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.”

[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.”

[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).”

[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.”

[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.”

[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.”
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 sub awards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

**Statement for Loan Guarantees and Loan Insurance**

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

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

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

15.2. Drug-Free Workplace Requirements

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

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

(1) By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.

(2) The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.

(3) For grantees other than individuals, Alternate I applies.

(4) For grantees who are individuals, Alternate II applies.

(5) Workplaces under grants, for grantees other than individuals, need to be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee’s drug-free workplace requirements.

(6) Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio studios).

(7) If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).

(8) Definitions of terms in the Nonprocurement Suspension and Debarment common rule and
Drug-Free Workplace common rule apply to this certification. Grantees’ attention is called, in particular, to the following definitions from these rules:

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

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

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

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

**Certification Regarding Drug-Free Workplace Requirements**

Alternate I. (Grantees Other Than Individuals)

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

(a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee’s workplace and specifying the actions that will be taken against employees for violation of such prohibition;

(b) Establishing an ongoing drug-free awareness program to inform employees about - -

(1) The dangers of drug abuse in the workplace;
(2) The grantee’s policy of maintaining a drug-free workplace;
(3) Any available drug counseling, rehabilitation, and employee assistance programs; and
(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;

(c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);

(d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will - -

(1) Abide by the terms of the statement; and
(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

(e) Notifying the agency in writing, within 10 calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every
grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

(f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

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

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

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

☐ Check if there are workplaces on file that are not identified here. Alternate II. (Grantees Who Are Individuals)

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

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

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

☐ By checking this box, the state CSBG authorized official is providing the certification set out above.
CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS

Certification Regarding Debarment, Suspension, and Other Responsibility Matters

Instructions for Certification

(1) By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.

(2) The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency’s determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.

(3) The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

(4) The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.

(5) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.

(6) The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.

(7) The prospective primary participant further agrees by submitting this proposal that it will include the clause titled “Certification Regarding Debarment, Suspension, Ineligibility and
Voluntary Exclusive-Lower Tier Covered Transaction,” provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

(8) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

(9) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

(10) Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

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

Primary Covered Transactions

(1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:

(a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;

(b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

(c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and

(d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.
(2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

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

Instructions for Certification

(1) By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.

(2) The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

(3) The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.

(4) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.

(5) The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.

(6) The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled “Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction,” without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

(7) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.
(8) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

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

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 103-227, 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.