

2021-22 Community Services Block Grant (CSBG) State Plan - Draft

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Section 1
CSBG Administrative Information

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

1.1a. Provide the federal fiscal years this plan covers: Year One 2021 Year Two 2022

GUIDANCE: If a state indicates “One-Year” under 1.1., they will only have to provide a response for “Year One”

1.2. 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? Yes No

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

December 2019 – Authorized Official

- | | | |
|---|---|--|
| <input type="checkbox"/> Lead Agency | <input type="checkbox"/> Department Type | <input type="checkbox"/> Department Name |
| <input checked="" type="checkbox"/> Authorized Official | <input type="checkbox"/> Street Address | <input type="checkbox"/> City |
| <input type="checkbox"/> Zip Code | <input checked="" type="checkbox"/> Office Number | <input type="checkbox"/> Fax Number |
| <input checked="" type="checkbox"/> Email Address | <input type="checkbox"/> Website | |

1.2a. Lead agency **Oregon Housing and Community Services**

GUIDANCE: This should only include the exact name of the lead agency and an acronym (as applicable).

EXAMPLE: Office of Community Services (OCS)

1.2b. Cabinet or administrative department of this lead agency [**Check One and narrative where applicable**]

- Community Affairs Department
- Community Services Department
- Governor’s Office
- Health Department
- Housing Department
- Human Services Department
- Social Services Department
- Other, describe: **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 Director of the Housing Stabilization Division

Name **Andrea Bell** Title **Director of Housing Stabilization**

- 1.2e. Street Address **725 Summer St NE, Siute B**
- 1.2f. City **Salem**
- 1.2g. State **Oregon**
- 1.2h. Zip Code **97301**
- 1.2i. Work Telephone Number and Extension (if applicable) **503-986-0971**
- 1.2j. Fax Number **503-986-6877**
- 1.2k. Email Address **Andrea.Bell@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.

Designation Letter to be attached at submission

GUIDANCE: The designation letter should be updated whenever there is a change to the designee.

Instructional Note: The letter should be from the chief executive officer of the state and include, at minimum, the designated state CSBG lead agency and title of the authorized official of the lead agency who is to administer the CSBG grant award.

- 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 ○ No

If yes, provide the date of change and select the fields that have been updated **[Date Picker and Check all the apply]**

- | | | |
|---|--|---|
| <input type="checkbox"/> Agency Name | <input checked="" type="checkbox"/> Point of Contact | <input type="checkbox"/> Street Address |
| <input type="checkbox"/> City | <input type="checkbox"/> State | <input type="checkbox"/> Zip Code |
| <input checked="" type="checkbox"/> Office Number | <input type="checkbox"/> Fax Number | <input checked="" type="checkbox"/> Email Address |

Website

1.4a. Agency Name **Oregon Housing and Community Services**

1.4b. Point of Contact Name

Name Leeann Marx Title CSBG Program Coordinator

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

1.4d. City **Salem**

1.4e. State **Oregon**

1.4f. Zip Code **97301**

1.4g. Office Telephone Number **503-986-6892**

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

1.4i. Email Address Leeann.marx@oregon.gov

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

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

GUIDANCE: Under this question, please respond yes and provide the information if there is an entity or organization that serves in the capacity of a state community action association that is located within your state, whether voluntarily or contractually. If the entity that serves as the state community action association is located outside of the state, or if there is only a single eligible entity within the state that also performs the functions of a Community Action Association, please answer no to this question.

There is currently a state Community Action Association within the state. ● Yes ○ No

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

If yes, provide the date of change and select the fields that have been updated. **[Date Picker and Check all the apply]**

- | | | |
|--|---|---|
| <input type="checkbox"/> Agency Name | <input type="checkbox"/> Executive Director | <input type="checkbox"/> Street Address |
| <input type="checkbox"/> City | <input type="checkbox"/> State | <input type="checkbox"/> Zip Code |
| <input type="checkbox"/> Office Number | <input type="checkbox"/> Fax Number | <input checked="" type="checkbox"/> Email Address |
| <input type="checkbox"/> Website | <input type="checkbox"/> RPIC Lead | |

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 **Oregon**
- 1.5f.** Zip Code **97302**
- 1.5g.** Telephone Number **503-830-9969**
- 1.5h.** Fax Number **503-363-0113**
- 1.5i.** Email Address janet@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 No

DRAFT

Section 2 State Legislation and Regulation

- 2.1. **CSBG State Legislation:** State has a statute authorizing CSBG. Yes No
- 2.2. **CSBG State Regulation:** State has regulations for CSBG. Yes No
- 2.3. **Legislation/Regulation Document:** Attach the legislation and/or regulations or provide a hyperlink(s) to the documents indicated under Items 2.1. and/or Item 2.2.

<http://oregonlaws.org/ors/458.505>

GUIDANCE: The labeling of all attachments should include the question number for which the document provides supplementary information, the question heading, and the type of document provided. As an example, a state statutory document could be labeled as:

2.3. Legislation/Regulation Document, Washington D.C. Statute

- 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. Yes No
- 2.4b. **Regulation Amendments:** State established or amended regulations for CSBG last federal fiscal year. Yes 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 No

Section 3

State Plan Development and Statewide Goals

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

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 anti-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.

GUIDANCE: States should take into account feedback from OCS, their eligible entities, and the ACSI survey completed by eligible entities when creating their state plan goals.

Instructional Note: For examples of “goals,” see State Accountability Measure 1Sa(i).

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

OHCS’s statewide housing plan articulates how OHCS will pave the way for more Oregonians to have access to the stable housing opportunities necessary for self-sufficiency. This plan consists of six priority strategies: Equity and Racial Justice, Homelessness, Permanent Supportive Housing, Affordable Rental Housing, Homeownership and Rural Communities all of which supports the purpose and intent of CSBG. The Housing Stabilization Division is responsible for implementing the goal to prevent and reduce statewide poverty and homelessness. The Statewide Housing plan 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 data collection, and improving policy.

In addition to the common goal of the Statewide Housing Plan, the CSBG program will focus efforts on two goals. The first goal will be to increase and improve data collection and reporting. The second goal to facilitate and encourage coordination and establishment of linkages among government agencies and social services to increase efficiency and effective planning of service delivery with an emphasis on culturally specific social service entities.

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

3.3a. Analysis of state-level tools [Check all that applies and narrative where applicable]

- State Performance Indicators and/or National Performance Indicators (NPIs)
- U.S. Census data
- State performance management data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)
- Monitoring Visits/Assessments
- Tools not identified above (specify) **[Narrative, 500 characters]**

3.3b. Analysis of local-level tools [Check all that applies and narrative where applicable]

- Eligible entity community needs assessments
- Eligible entity community action plans
- Public Hearings/Workshops
- Tools not identified above (e.g., state required reports) [specify] **[Narrative, 500 characters]**

3.3c. Consultation with [Check all that applies and narrative where applicable]

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

3.4. Eligible Entity Involvement

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

The plan was to implement a specific meeting to discuss the State Plan and invite the State Association and the network to participate. However, with the current pandemic and challenging times to meet in person, OHCS presented a memorandum to the network to discuss multiple options of reviewing the draft state. The option selected by the network is to have the draft state plan reviewed by the State Association to offer any recommended edits and review them with the CAPO board. A workgroup will be formed for future discussion

and evaluation during the coming year to review the Organizational Standards, Use of funds, the funding formula, monitoring and T/TA. Several members of the network have already been identified to participate in the future discussions.

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

- 3.4b. Performance Management Adjustment:** Describe how the state has adjusted its State Plan development procedures under this State Plan, as compared to previous 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.

OHCS utilized the 2019 ACSI survey results to improve communication related to the State Plan and provide opportunities for involvement. OHCS provided a draft of the State Plan to the State Association for comments, feedback and discussion on the State Plan. Although, an in-person meeting is optimal and will be considered for the future, this is not an option during the COVID-19 Pandemic. As stated in 3.4a adjustments to reviewing the state plan were made.

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

- 3.5. Eligible Entity Overall Satisfaction:** Provide the state's target for eligible entity Overall Satisfaction during the performance period. Year One 57 Year Two 62

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

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

GUIDANCE: The targets reported here should match the future target set in the Annual Report, Section B, Table B.2.

GUIDANCE: Review the [ACSI IM](#) about setting targets for your eligible entity overall satisfaction that are realistic, reasonable, attainable, and possible.

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 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 are posted on the OHCS website and on a government transparency website, in addition to being sent electronically to the CAA Network, the State Association and via Constant Contact (the OHCS public listserv).

GUIDANCE: Under this question, detail how the state provided the State Plan to the public, including providing sufficient time (ideally no fewer than 30 days) for the public to provide feedback prior to the public hearing. Distribution to the public should include distribution directly to the eligible entities (e.g. via email or publication on a public website with specific notification to the eligible entities) in the state as well as any other interested parties.

- 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 developed and distributed electronically to the Network and the State Association. 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.

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

Date	Location	Type of Hearing <i>[Select an option]</i>	If a Combined Hearing was held confirm that the public was invited.
TBD – July 2020	Zoom – Virtual Public Hearing 725 Summer St NE, Salem, OR 97301	<input checked="" type="radio"/> Public <input type="radio"/> Legislative <input type="radio"/> Combined	<input type="checkbox"/>
ADD a ROW function Note: States will be able to add as needed for each additional hearing.			

GUIDANCE: A combined hearing refers to having one joint public and legislative hearing.

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

See Appendix B

GUIDANCE: Supporting documentation may include, but is not limited to, agendas, sign-in sheets, transcripts, and notices/advertisements of the hearings. All attachments should include the question number, question heading, type of document and the date of the hearing/meeting (as applicable).

EXAMPLE: An agenda would be named: 4.4. Public and Legislative Hearings Agenda 062117

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.

CSBG Eligible Entity	Geographical Area Served (by county) [Provide all counties]	Public or Nonprofit	Type of Entity (choose all that apply)
ACCESS	Jackson County	Nonprofit	<ul style="list-style-type: none"> • Community Action Agency
Community Action Organization (CAO)	Washington County	Nonprofit	<ul style="list-style-type: none"> • Community Action Agency
Community Action Program of East Central Oregon (CAPECO)	Gilliam, Morrow, Umatilla and Wheeler Counties	Nonprofit	<ul style="list-style-type: none"> • Community Action Agency
Community Action Team (CAT)	Clatsop, Columbia, and Tillamook Counties	Nonprofit	<ul style="list-style-type: none"> • Community Action Agency
Community Connection of NE Oregon (CCNO)	Baker, Grant, Union, and Wallowa Counties	Nonprofit	<ul style="list-style-type: none"> • Community Action Agency
Clackamas County Social Services (CCSS)	Clackamas County	Public	<ul style="list-style-type: none"> • Community Action Agency
Community in Action (CinA)	Harney, and Malheur Counties	Nonprofit	<ul style="list-style-type: none"> • Community Action Agency
Community Services Consortium (CSC)	Benton, Lincoln, Linn Counties	Public	<ul style="list-style-type: none"> • Community Action Agency
Klamath/Lake Community Action Services (KLCAS)	Klamath and Lake Counties	Nonprofit	<ul style="list-style-type: none"> • Community Action Agency
Lane County (LC)	Lane County	Public	<ul style="list-style-type: none"> • Community Action Agency
Mid-Columbia Community Action Council (MCCAC)	Hood River, Sherman and Wasco Counties	Nonprofit	<ul style="list-style-type: none"> • Community Action Agency
Multnomah County Department of Human Services (MULTCO)	Multnomah County	Public	<ul style="list-style-type: none"> • Community Action Agency
Mid-Willamette Valley Community Action Agency (MWVCAA)	Marion and Polk County	Nonprofit	<ul style="list-style-type: none"> • Community Action Agency
NeighborImpact (NIMPACT)	Crook, Deschutes, and Jefferson Counties	Nonprofit	<ul style="list-style-type: none"> • Community Action Agency

CSBG Eligible Entity	Geographical Area Served (by county) [Provide all counties]	Public or Nonprofit	Type of Entity (choose all that apply)
Oregon Human Development Corporation (OHDC)	Statewide Farmworker Organization	Nonprofit	<ul style="list-style-type: none"> Migrant or Seasonal Farmworker Organization
Oregon Coast Community Action Agency (ORCAA)	Coos and Curry Counties	Nonprofit	<ul style="list-style-type: none"> Community Action Agency
United Community Action Network (UCAN)	Douglas and Josephine Counties	Nonprofit	<ul style="list-style-type: none"> Community Action Agency
Yamhill Community Action Partnership (YCAP)	Yamhill County	Nonprofit	<ul style="list-style-type: none"> Community Action Agency
THE ADD-A-ROW FUNCTION WILL NOT BE AVAILABLE ON THIS TABLE. ANY ADDITIONS/DELETIONS TO THE ELIGIBLE ENTITY LIST SHOULD BE MADE WITHIN THE MASTER LIST.			

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

GUIDANCE: Under *Type of Entity*, select more than one type by holding down the CTRL key while making selections.

Note: Whether nonprofit or public, entities that receive CSBG funds are generally considered to be Community Action Agencies for the purpose of administering CSBG. The only specific exceptions outlined in the CSBG Act are Limited Purpose Agencies, Migrant and Seasonal Farmworker organizations, and Tribes and Tribal Organizations

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

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

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.

One or more of the following changes were made to the eligible entity list: **[Check all that apply]**.

- Designation and/or Re-Designation
- De-designations and/or Voluntary Relinquishments
- Mergers
- No Changes to Eligible Entities List

GUIDANCE: The following three questions will only need to be answered based on your response to 5.3.

5.3a. Designation and Re-Designation: Identify any new entities that have been designated as eligible entities, as defined under Section 676A of the Act, since the last federal fiscal year. Include any eligible entities designated to serve an area previously not served by CSBG as well as any entities designated to replace another eligible entity that was terminated (de-designated) or that voluntarily relinquished its status as a CSBG eligible entity.

CSBG Eligible Entity	Type	Start Date	Geographical Area Served
[Narrative, 150 characters]	[Dropdown: <ul style="list-style-type: none"> • Designation • Permanent Re-Designation • Interim Re-Designation] 	[Date Picker]	[Narrative, 550 characters]

ADD-A-ROW FUNCTION. Note: States will be able to add a row as needed.

GUIDANCE: A designation refers to an entity that was not receiving funding in the previous federal fiscal year(s) and/or was not included in the previous CSBG State Plan. Re-designation refers to an entity that is already designated/receiving funds but is now receiving funds to serve an additional geographic area previously served by another entity. A permanent re-designation **must be conducted consistent with procedures outlined in Section 676A of the CSBG Act.** An interim re-designation may be noted when an entity has been identified to provide services after a voluntary relinquishment pending official designation of a permanent entity consistent with the requirements of Section 676A. See CSBG Act 676A, *Designation and Redesignation...*, for more information.

5.3b. De-Designations and Voluntary Relinquishments: Identify any entities that are no longer receiving CSBG funding. Include any eligible entities have been terminated (de-designated) as defined under Section 676(c) and Section 676C of the Act, or voluntarily relinquished their CSBG eligible entity status since the last federal fiscal year.

CSBG Eligible Entity	Reason
[Narrative, 150 characters]	[Dropdown: <ul style="list-style-type: none"> • Termination/De-designation • Voluntary Relinquished]
ADD-A-ROW FUNCTION. Note: States will be able to add a row as needed.	

5.3c. Mergers: In the table below, provide information about any mergers or other combinations of two or more eligible entities that were each listed in the prior year state plan.

Original CSBG Eligible Entities	Surviving CSBG Eligible Entity	New Name (as applicable)	DUNS No.
[Narrative, 500 characters] <i>List and number all entities involved.</i>	[Narrative, 150 characters]	[Narrative, 150 characters]	[Narrative, 150 characters]
ADD-A-ROW FUNCTION. Note: States will be able to add a row as needed.			

GUIDANCE: This question refers to the merger of two or more existing CSBG eligible entities only. If an organization that was not previously a CSBG eligible entity merges is the surviving organization in a merger with a CSBG eligible entity, the new entity should be listed under 5.3a. as a new designation, while the previously funded CSBG eligible entity should be included under 5.3b.

Section 6 Organizational Standards for Eligible Entities

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

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

- COE CSBG Organizational Standards
- Modified version of COE CSBG Organizational Standards
- Alternative set of organizational standards

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

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

OHCS has not further modified the Organizational Standards for this state plan and no changes were made to the previously approved modified standards.

6.1b. Alternative Organizational Standards: If using an alternative set of organizational standards, attach the complete list of alternative organizational standards. **[Attachment (as applicable)]**

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

There were no changes from the previous State Plan submission **[Narrative, 2500 characters if not selected]**

Provide reason for using alternative standards **[Narrative, 2500 characters]**

Describe rigor compared to COE-developed Standards **[Narrative, 2500 characters]**

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.

- Regulation
- Policy
- Contracts with eligible entities

Other, describe: **[Narrative, 5000 characters]**

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

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

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

CSBG eligible entities submit an annual assessment through the online assessment system. OHCS works closely with the State Association on the timeline of the assessment and reviewing the results to strategize training and technical assistance. Eligible entities are required to provide a Technical Assistance Plan (TAP) for all unmet standards. The TAP is submitted, tracked and plans approved in the online assessment system. The TAP is accepted and closed once the standard is complete and met. OHCS continues to improve the process and consistency of evaluation of the Organizational Standards.

GUIDANCE: Descriptions should also include improvements to the process made since the previous year including any new processes to increase efficiency or consistency of assessments.

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 ○ No

GUIDANCE: The following question will only need to be answered based on your response to 6.4.

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: **[Auto – calculated]**

CSBG Eligible Entity	Exemption Provided	Description/Justification
Oregon Human Development Corporation (OHDC)		OHCS is 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 of poverty and the needs of farmworkers.

ADD a ROW function Note: Rows will be able to be added for each additional exception.

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 60% Year Two 75%**

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

GUIDANCE: Prior to setting the target, states should review [IM 138](#), review previous performance, and collaborate with the eligible entities and state association in identifying targets.

DRAFT

SECTION 7 State Use of Funds

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

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

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

7.1a. Formula Description: Describe the current practice for allocating CSBG funds to eligible entities.

The current funding formula utilized by OHCS for the 90% pass through funding is a Base+Formula (base fund + need-based formula). The formula utilizes:

Formula and criteria weights: The variables included in the formula are

- Poverty % of State (Criteria Weight - 50%) – The number of people in poverty compared to the total number of people in poverty for the State without considering the counties included in the floor agencies.**
- County/State Poverty Rate Ratio (Criteria Weight -10%)- The ratio of percent of people in poverty to percent of people in poverty for the State without considering the counties included in the floor agencies.**
- SNAP Recipients % of State (Criteria Weight - 40%) – The number of people receiving SNAP Food Stamps compared to the total number of people receiving SNAP food stamps in the State without considering the floor agencies. This data is updated annually.**
- The floor agencies receive base funding in the amount of \$150,000.**

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 ○ No

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 amount for Federal Fiscal Year (FFY) 2021 and (FFY)2022. These amounts are based on receiving the same annual allocation as received in (FFY) 2020

Planned CSBG 90 Percent Funds – Year One	
CSBG Eligible Entity	Funding Amount \$
ACCESS	295,233
CAO	408,126
CAPECO	150,000
CAT	150,000
CCNO	150,000
CCSSD	260,998
CinA	150,000
CSC	385,603
KLCAS	150,000
LC	544,677
MCCAC	150,000
MULTCO	812,270
MWVCAA	547,677
NIMPACT	276,224
ORCCA	150,000
UCAN	337,014
YCAP	150,000
OHDC	150,000
Total	5,819,761

Planned CSBG 90 Percent Funds – Year Two	
CSBG Eligible Entity	Funding Amount \$
ACCESS	295,233
CAO	408,126
CAPECO	150,000
CAT	150,000
CCNO	150,000
CCSSD	260,998
CinA	150,000
CSC	385,603
KLCAS	150,000
LC	544,677
MCCAC	150,000
MULTCO	812,270
MWVCAA	547,677
NIMPACT	276,224
ORCCA	150,000
UCAN	337,014

Planned CSBG 90 Percent Funds – Year Two	
CSBG Eligible Entity	Funding Amount \$
YCAP	150,000
OHDC	150,000
Total	5,819,761

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

7.3.Distribution Process: Describe the specific steps in the state’s process for distributing 90 percent funds to the eligible entities and include the number of days each step is expected to take; 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 office 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 eligible entities, 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 (7days)**
- **Once processed, the CSBG Program Coordinator creates a Notice of Allocation and submits it to the Finance Department. Funds are available to agencies through the OPUS database system. (7 days)**
- **A copy of the award letter and spreadsheet of the allocation breakdown per agency is electronically filed with all other CSBG documents on the agency’s server.**

In the event of unexpected increases or decrease, 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 allocated 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 network for discussion and recommendations for 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? ● Yes ○ No

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

With the new OHCS agency fiscal policy, this has changed from the previous state plan.

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.

The contract process at OHCS is working on continuous improvements to the Master Grant Agreement and has moved to a performance-based contract to ensure best practices are being utilized in service delivery. OHCS is not planning any new contract administration procedures.

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

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

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

Year One 5 % **Year Two** 5 %

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

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

Year One 18 **Year Two** 18

7.8. State FTEs: Provide the number of state Full Time Equivalent (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 ○ No

GUIDANCE: “No” should only be selected if the percentages provided under 7.2. and 7.6. equal to 100%.

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%

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

Instructional Note: The assurance under 676(b)(2) of the Act (Item 14.2 of this State Plan) specifically requires a description of how the state intends to use remainder/discretionary funds to “support innovative community and neighborhood-based initiatives related to the purposes of [the CSBG Act].” Include this description in Item 7.9f of the table below and/or attach the information.

If a funded activity fits under more than one category in the table, allocate the funds among the categories. For example, if the state provides funds under a contract with the State Community Action association to provide training and technical assistance to eligible entities and to create a statewide data system, the funds for that contract should be allocated appropriately between Items 7.9a. – 7.9c. If allocation is not possible, the state may allocate the funds to the main category with which the activity is associated.

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

Use of Remainder/Discretionary Funds – Year One		
Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
7.9a. Training/technical assistance to eligible entities	\$120,000	State Association Implementation Report
7.9b. Coordination of State-operated programs and/or local programs	N/A	These planned services/activities will be addressed in the State Plan Section 9, State linkages and communication
7.9c. Statewide coordination and communication among eligible entities	\$70,000	State Association Implementation Report
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need	N/A	N/A
7.9e. Asset-building programs	N/A	N/A
7.9f. Innovation programs/activities by eligible entities or other neighborhood group	\$55,000	State Association Implementation Report - Capacity Building Projects
7.9g. State charity tax credits	N/A	N/A

Use of Remainder/Discretionary Funds – Year One		
Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
7.9h. Other activities [Specify under Column 4]	\$45,000	Support to floor agencies, Organizational Software
Totals	\$290,000	

Use of Remainder/Discretionary Funds – Year Two (as applicable)		
Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
7.9a. Training/technical assistance to eligible entities	\$120,000	State Association Implementation Report
7.9b. Coordination of State-operated programs and/or local programs	N/A	These planned services/activities will be addressed in the State Plan Section 9, State linkages and communication
7.9c. Statewide coordination and communication among eligible entities	\$70,000	State Association Implementation Report
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need	N/A	N/A
7.9e. Asset-building programs	N/A	N/A
7.9f. Innovation programs/activities by eligible entities or other neighborhood group	\$55,000	State Association Implementation Report - Capacity Building Projects
7.9g. State charity tax credits	N/A	N/A
7.9h. Other activities [Specify under Column 4]	\$45,000	Support to floor agencies, Organizational Software
Totals	\$290,000	

GUIDANCE: If the percentages provided under 7.2. and 7.6. do not equal 100%, the remaining percentage should be reported under 7.9. If the state does not have any remainder/discretionary fund activities (as listed in 7.9a. – 7.9g.), the remainder should be described in 7.9h.

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. **[Check all that apply and narrative where applicable]**

- The state directly carries out all activities (No Partnerships)
- The state partially carries out some activities

- CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds) **9**
- Other community-based organizations
- State Community Action association
- Regional CSBG technical assistance provider(s)
- National technical assistance provider(s)
- Individual consultant(s)
- Tribes and Tribal Organizations
- Other [**Narrative, 2500 characters**]

Note: This response will link to the corresponding CSBG assurance in Item 14.2.

- 7.11. 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 use of discretionary funds is consistent with past years. The 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. OHCS Fiscal Policy ensures funds are allocated in full upon receipt of the Official Funding Award Letter from HHS/OCS. The third usage, OHCS will continue to contract with the CSG software company, which enables efficient review and tracking of the Organizational Standards to meet the State Accountability measures of the CSBG Act.

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

SECTION 8

State Training and Technical Assistance

8.1. Training and Technical Assistance Plan: Describe the state’s plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan by completing the table below. 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. States should also describe training and technical assistance activities performed directly by state staff, regardless of whether these activities are funded with remainder/discretionary funds.)

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

GUIDANCE: Table 8.1. should only include the trainings that are being paid for using state discretionary training and technical assistance funds as noted under 7.9a.

Training and Technical Assistance – Year One			
Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
Dropdown Options: <ul style="list-style-type: none"> Ongoing/Multiple Quarters 	Toggle Options: <ul style="list-style-type: none"> Both 	Dropdown Options: <ul style="list-style-type: none"> Fiscal Governance/Tripartite Boards Organizational Standards – General Organizational Standards – for eligible entities with unmet TAPs or QIPs Reporting ROMA Community Assessment Strategic Planning Monitoring Best Practices Other – COVID-19 T/TA 	State Association Implementation Report OHCS trainings RPIC regional trainings
ADD A ROW function Note: Rows will be able to be added for each additional training			

Training and Technical Assistance – Year Two			
Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
Dropdown Options: <ul style="list-style-type: none"> Ongoing/Multiple Quarters 	Toggle Options: <ul style="list-style-type: none"> Both 	Dropdown Options: <ul style="list-style-type: none"> Other – TBD as per T/TA survey sent out annually by the State Association 	
ADD A ROW function Note: Rows will be able to be added for each additional training			

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

[Prepopulated with the budget allocation for years one and two under 7.9a]

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 the State Association, Community Action Partnership of Oregon (CAPO), to provide training and technical assistance to the Community Action Agency Network. CAPO surveys the network annually to determine agency training needs. OHCS and CAPO utilize the results from the surveys, monitoring results and performance and accountability measures from the Organizational Standards assessment for guidance to build training and technical assistant opportunities.

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 ○ No

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 CAPO to provide training on topics that multiple agencies struggle with in relation to the Organizational Standards. Additionally, OHCS staff offers one-on-one trainings upon request and will continue to traveled out to agencies to offer assistance if necessary.

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.) **[Check all that applies and narrative where applicable]**

- CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds) **[Numeric response, 0 – 100]**
- Other community-based organizations
- State Community Action Association
- Regional CSBG technical assistance provider(s)
- National technical assistance provider(s)
- Individual consultant(s)
- Tribes and Tribal Organizations
- Other – **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 work with CAPO on designing/scheduling a training calendar based on agency needs and be as flexible as possible. The annual survey for agency training needs has proven valuable and will be a continued practice and is in alignment with the RPIC needs. OHCS will provide input on the training schedule to incorporate needed training from the Organizational Standards assessment review and results from Technical Assistance Plans.

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

SECTION 9

State Linkages and Communication

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

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

In addition to internal coordination between OHCS administrated 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 specially assigned to work at the state, regional and local level to identify opportunities for system alignment, coordination, innovation and resource sharing centered on affordable housing and poverty. OHCS participates in a multi-agency workgroup named the Poverty Roundtable to further identify linkages and agency collaboration. Additional focused efforts and collaborations are essential in the work to address the disparities for our communities of color to bridge the gap of resources and aligns with the OHCS Statewide Housing plan.

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

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

- 9.2. State Linkages and Coordination at the Local Level:** Describe the linkages and coordination at the local level that the state 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 CAA network 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 provide services to low-income individuals and families to address the communities local needs.

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 and collaborations within the local system to help 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.

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

9.3. Eligible Entity Linkages and Coordination

9.3a. State Assurance of Eligible Entity Linkages and Coordination: Describe how the state will assure that eligible entities will 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 an implementation report (formerly known as the Community Action Work plan) as a part of the Master Grant Agreement process. Within this implementation report, 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**
- **Primary funding and service coordination of 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.

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

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

As described previously, the required CSBG implementation report requires linkage and partnership collaboration. OHCS reviews the plans to ensure appropriate coordination is happening as documented through existing MOU/service agreements, coordinated entry and assessment systems, joint case planning, convening of partners to provide wrap around services, resources, data sharing through HMIS and other locally appropriate linkage examples.

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

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

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

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. **[Narrative, 5000 Characters]**

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.

Oregon has established an infrastructure per the Governor's Executive Order No. 11-12, in which State resources are strategically aligned throughout Oregon to accomplish community and economic goals with the Regional Solutions Advisory Committees, Centers and Teams. Regional Solutions Centers are located throughout Oregon. Starting at the local level to identify priorities, solve problems and seize opportunities to get projects done. OHCS utilizes its involvement to help strengthen linkages with workforce employment and training activities in areas where CAAs have identified barriers.

- 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 ongoing coordination at both the State and Local level. The Master Grant Agreement (MGA) contracting process is utilized for all these program areas and CAAs are encouraged to link these services to ensure the most cost effective delivery of services to clients.

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

- 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 partnership through its contracting process as described previously. The CAAs implementation plan requires identification of partnerships including those of faith based, non-profit organizations and other community groups. Eligible entities are required to submit these partnerships/linkages/collaborations in the CSBG Annual Report that is reviewed by CSBG Staff and the State Association. Review of community needs assessments, strategic plans, and implementation reports are all ways for eligible entities to demonstrate this. Review of client service data provides the opportunity to see who is being served with an equity lens creating opportunities of OHCS staff to assist where necessary in providing T/TA to create partnerships with key cultural specific communities and service/advocacy organizations.

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

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

Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act.

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.

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

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

Describe state activities for supporting coordination among the eligible entities and the State Community Action Association.

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 training and technical 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 training opportunities like ROMA training and training and technical assistance on Organization best practices to help strengthen all Eligible Entities.

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

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

For any topic that is not applicable, select *Not Applicable* under Expected Frequency.

Communication Plan			
Subject Matter	Expected Frequency	Format	Brief Description of "Other"
Upcoming Public and/or Legislative Hearings	<ul style="list-style-type: none"> As needed For all 	<ul style="list-style-type: none"> Newsletters, emails, website, public notice Meetings/Presentations, emails, phone calls, 1:1, public notice Email, website, webinar, phone calls, 1:1, meetings/presentations Email, 1:1 Email, 1:1 Email/Website Email/website/mtg/presentations/1:1 Email Email/newsletter Email/website Email/website/1:1 	<p>If "Other" is selected in Column 3, describe in this column.</p> <p>N/A</p>
State Plan Development			
Organizational Standards Progress			
State Accountability Measures Progress			
Community Needs Assessments/Community Action Plans			
State Monitoring Plans and Policies			
Training and Technical Assistance (T/TA) Plans			
ROMA and Performance Management			
State Interagency Coordination			
CSBG Legislative/Programmatic Updates			
Tripartite Board Requirements			
ADD A ROW function Note: Rows will be able to be added for each additional training			

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. [

OHCS will respond appropriately to the State Accountability Measure 5S(iii) by utilizing the communication plan described in 9.9. In circumstances where the feedback is requiring further discussion, OHCS will initiate direct contact with the community action agency. OHCS will notify CAPO and the network through email to provide information on state accountability measures within 60 days of receiving feedback from OCS. In addition to providing the information regarding the states' performance on state accountability measures, OHCS will coordinate with CAPO to share and discuss relevant results, concerns and feedback.

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

GUIDANCE: Under this question, include how the state will provide information to local entities and state associations within 60 days of receiving feedback from OCS.

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 the public hearing. If the state is not making any adjustments, provide further detail.

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 the 2019 ACSI survey, OHCS has made an increased effort to engage the State Association and the CAA network more frequently to communicate regular program updates and to provide resources and best practices in the program updates. In person meetings and network phone calls are provide on an as needed basis to increase communication and transparency as well.

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

SECTION 10

Monitoring, Corrective Action, and Fiscal Controls

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

10.1. 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.

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

GUIDANCE: Monitoring that is specific to organizational standards should be referenced within Section 6, Item 6.3a.

Monitoring Schedule – Year One						
CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of “Other”
MWVCAA	Full On-Site	Onsite Review	• FY1 Q1	1/9/2018	1/11/2018	
YCAP	Full On-Site	Onsite Review	• FY1 Q2	3/27/2018	3/29/2018	
CCSSD	Full On-Site	Onsite Review	• FY1 Q2	4/3/2018	4/5/2018	
CAPECO	Full On-Site	Onsite Review	• Fy1 Q2	3/14/2018	3/16/2018	
MULTCO	Full On-Site	Onsite Review	• FY1 Q3	5/9/2017	5/11/2017	

Monitoring Schedule – Year Two						
CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of “Other”
TBD	• Full On-Site	• Onsite Review				

GUIDANCE: Comprehensive monitoring includes a review of program, administrative, fiscal and organizational standards.

If you are monitoring an entity as a follow up to an issue with another program this can be listed under “Other.”

When providing the date of your last full onsite review – this could be for any type of review that took place onsite. No dates for desk reviews should be provided here.

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

See Appendix C

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 days

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 No

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

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

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

10.6. Reporting of QIPs: Describe the state’s process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the state approving a QIP?

In the event a community action agency has serious defficiencies 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 Program Specialist assigned to OHCS. This report will include: agency name, listed defficiencies, timeframe for improvement and approved action plan.

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

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 No

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

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

10.8. Eligible Entity Designation: Do the state CSBG statute and/or regulations provide for the designation of new eligible entities? Yes No

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

10.8b. 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. **N/A**

10.9. Eligible Entity Termination: Do state CSBG statute and/or regulations provide for termination of eligible entities? Yes No

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

10.9b. 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. **N/A**

10.10. Eligible Entity Re-Designation: Do the state CSBG statute and/or regulations provide for re-designation of an existing eligible entity? Yes No

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

OAR 813-230-0010

10.10b. 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. **N/A**

GUIDANCE: Re-designation implies that an entity that is already designated/receiving funds is now performing the duties and receiving funds that were previously designated to another entity, in addition to the funding that they are already receiving. This is different from a merger as an entity is not absorbing another entity. This re-designation may be permanent (**requires a formula redistribution**) or temporary while the state has officially designated a new entity and has completed a formula redistribution. See CSBG Act 676A, *Designation and Redesignation...*, for more information.

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 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 ○ No

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

- 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 prior plans continue to be applicable including the reduction in duplicate review and monitoring requests and

closer alignment between program and fiscal monitoring. The monitoring cycle includes: the Master Grant Agreement contracting process inclusive of the Implementation Report (formerly known as the Community Action Plan) application, program and fiscal onsite reviews, the Organizational Standards assessment and onsite/desk reviews by the CSBG Program Coordinator.

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

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SECTION 11

Eligible Entity Tripartite Board

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

- Attend Board meetings
- Organizational Standards Assessment
- Monitoring
- Review copies of Board meeting minutes
- Track Board vacancies/composition
- Other **[Narrative, 2500 characters]**

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
- Quarterly
- Monthly
- As It Occurs
- Other **[Narrative, 2500 characters]**

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

The 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.

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

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

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

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Section 12

Individual and Community Income Eligibility Requirements

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

- 125% of the HHS poverty line

GUIDANCE: Under *Varies by eligible entity*, provide the threshold and the reason that it varies by entity.

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

Income is used to ensure that participants do not exceed 125% of the Federal Poverty Level or the maximum as assigned by HHS-ACF-OCS. 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, Social Security Office
- Bank Statements
- Copies of checks
- Letters from employers
- Self-employment records

Once the 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 Implementation Report 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, 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 Implementation Report application**
- **Organizational Standards**
- **Community Needs Assessment**
- **Community Action Agency Strategic Plan**
- **National Performance Indicators**
- **CSBG Annual Report**
- **Monitoring**

SECTION 13

Results Oriented Management and Accountability (ROMA) System

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

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

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

- 13.1a. ROMA Description:** If ROMA was chosen in Item 13.1, describe the state's written policies, procedures, or guidance documents on ROMA. [

OHCS has intertwined ROMA in many areas: Implementation Reports, Community Needs Assessments, Trainings, Organizational Standards and the Annual Report. The CSBG Program Coordinator has received certification as a ROMA Implementer to help provide guidance of the ROMA principles.

In addition, agencies have an opportunity to send staff to ROMA workshops that are offered around the state as part of the technical and training assistance provided by the State Association.

- 13.1b. Alternative System Description:** If an alternative system was chosen in Item 13.1, describe the system the state will use for performance measurement.

N/A

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

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

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

Eligible entities agree to participate in ROMA and report NPIs as part of the Master Grant Agreement process. This process includes reviewing the target and projection of services to the actual outcomes that agencies submit in their CSBG annual report. In addition to the NPIs required as part of the CSBG Annual Report, OHCS is working in collaboration with Washington and Idaho, under the Theory of Change project, in developing additional performance indicators for individuals and families as well as communities that best represent the work done in community action agencies including the indicators required by statute.

- 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 of Oregon to provide training and technical assistance to the 18 eligible entities. CAPO provides the network with 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 CSBG Annual Report and provides technical assistance during this process.

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 to inform OHCS outcomes from their Implementation Reports (community action plan) in the Master Grant Agreement. The Organizational Standards 1.3, 6.4 and 9.3 is another way to document that the eligible entities are analyzing and evaluating the data from the programs and services provided.

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

Community Action Plans and Needs Assessments

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

OHCS requires that eligible entities submit a CSBG Implementation Report application (formerly known as the Community Action Plan) as a part of the Master Grant Agreement process. In this application, eligible entities are required to submit detailed information gathered from their current Community Needs Assessment in addition to how they are going to address the needs and gaps of services. The main categories covered in the application are Tripartite Board Information, Community Needs Assessment, Service Area (poverty rates), Service Delivery System, Data Management and ROMA, Plan out of Poverty, Linkages and Referrals and budgets. Prior to releasing CSBG funds to the eligible entities, the CSBG Program Coordinator will review and approve the applications.

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

- 13.6. Community Needs Assessment:** Describe how the state will assure that each eligible

entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity's Community Action Plan, as required by Section 676(b)(11) of the CSBG Act.

As stated in 13.5, the Implementation Report requires the Community Needs Assessment information to be used to strategize and address their local community needs, as well as to include collaboration and coordination with community partners involved in addressing the needs and gaps of the community.

The agencies must also submit their community needs assessment as a part of the Organizational Standards assessment process and is required to be updated at least every three years.

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

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

14.1. Use of Funds Supporting Local Activities

CSBG Services

14.1a. 676(b)(1)(A) 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;

OHCS requires that submitted Implementation Reports (Community Action Plan)

indicate funds will be used for eligible activities. This is confirmed with the Community Needs Assessment and with monitoring. OHCS under state statute OAR 813-210-0025, outlines the use of CSBG program funds which addresses each of the noted assurances.

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 through the Master Grant Agreement to identify and address the needs of youth in their communities through their Community Needs Assessment. This provides the means for OHCS to review agencies' services and whether they are addressing the needs (including needs of youth), through their agency's services and/or a providing linkages and partnerships for this.

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)

OHCS will assure that funds are used for eligible activities through the evaluation of the Implementation Report (Community Action Plan). The eligible entities 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.

State Use of Discretionary Funds

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

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

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

Eligible Entity Service Delivery, Coordination, and Innovation

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

Eligible Entity Service Delivery System

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

Oregon community action agencies set policies, design programs, and evaluate services intended to reduce or eliminate the causes and conditions of poverty. Each agency utilizes a community-based needs assessment to target services based on local needs. Activities and services vary by agency, depending on the needs of the community, local resources, and the opportunities for collaboration and partnership with business, private non-profit organizations and state and local government. Oregon has eighteen eligible entities, which serve all thirty-six counties in the state. CAAs are the primary delivery mechanisms for OHCS’s 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.

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 followup consultations.”

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

[No response; links to 9.3b.]

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

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

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

[No response; links to 9.7]

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

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

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

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

All eligible entities directly provide emergency services and referrals to emergency services. OHCS will assure that funds are used for eligible activities through the evaluation of the Implementation Report, the Community Needs Assessment and monitoring.

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

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

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

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

State Coordination/Linkages and Low-income Home Energy Assistance

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

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

[No response; links to 9.2 and 9.5]

Federal Investigations

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

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

[No response; links to 10.13]

Funding Reduction or Termination

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

the Secretary as provided in section 678C(b).”

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

[No response; links to 10.7]

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

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

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

[No response; links to 9.6]

Eligible Entity Tripartite Board Representation

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

Note: The state describes this assurance under Eligible Entity Tripartite Boards, item 11.3

[No response; links to item 11.3]

Eligible Entity Community Action Plans and Community Needs Assessments

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

[No response; links to items 13.5 and 13.6]

State and Eligible Entity Performance Measurement: ROMA or Alternate system

14.12. 676(b)(12) Provide “an assurance that the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented

Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to section 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and [describe] outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization.”

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

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

Validation for CSBG Eligible Entity Programmatic Narrative Sections

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

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

[No response for this item]

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

SECTION 15 Federal Certifications

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

15.1. Lobbying

Certification for Contracts, Grants, Loans, and Cooperative Agreements

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

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

Statement for Loan Guarantees and Loan Insurance

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

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

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

15.2. Drug-Free Workplace Requirements

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

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

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

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

Conviction means a finding of guilt (including a plea of nolo contendere) or imposition of

sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

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

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

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Grantees Other Than Individuals)

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

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

- (f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -
 - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

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

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

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

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

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

15.3. Debarment

CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS

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

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.
- (2) The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.
- (3) The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.
- (4) The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
- (5) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.
- (6) The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.
- (7) The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and

Voluntary Exclusive-Lower Tier Covered Transaction,” provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

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

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

Primary Covered Transactions

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

- (2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

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

Instructions for Certification

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

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

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

Appendix A: Designation Letter – this has been obtained and ready to be attached.

Appendix B: Public Hearing Notice and Minutes – will be attached upon completion.

Appendix C: HSS Program Compliance Monitoring Procedures (see below)

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

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

Frequency

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

Notification

A monitoring confirmation letter will be sent to Agency's director no later than 30 days prior to proposed monitoring date to inform agency of upcoming monitoring visit. Request will be made for Agency to provide list of all clients served with funds during target Fiscal Year being reviewed.

Desk Pre-Review

An Agency's Master Grant Agreement and Addendums will be reviewed prior to the monitoring visit to obtain information on how funds were reported to be used. File audit selection will be made from the list of clients provided to include a sample for all program that will be monitored.

On-Site Monitoring Visit

HSS will conduct an opening meeting with program staff involved in the administration of program funds to explain the intent and process of the visit.

The HSS Program Compliance Officer will review each client file selected for audit to

ensure that all program guidelines were followed appropriately and a client file checklist will be completed.

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

Desk Monitoring

Depending on prior successful program monitoring desk monitoring may be requested.

. OHCS may request Agency’s to send client files electronically through a secure portal.

Monitoring Report

Within 60 days after an on-site inspection, OHCS will endeavor to provide Subgrantee with a written report as to its findings from that review. OHCS will advise the Subgrantee of any corrective action that it deems appropriate based upon monitoring activities or otherwise. The report will ask the sub-grantee to respond with corrective actions to any concern/finding outlined by OHCS. Subgrantee shall timely satisfy such corrective actions requested.

Risk Based Analysis

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

Category	Title	Rating
A	Policies & Procedures	20%
B	Application process	20%
C	Client Eligibility	50%
D	Client file accuracy	10%
		100%

Points	Rating
90 to 100	Superior
80 to 90	Above Average
60 to 80	Satisfactory
50 to 60	Below Average
Below 50	Unsatisfactory

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

Resolution

OHCS will track and follow up with Subgrantee regarding the correction by Subgrantee of findings made or other corrective actions required in OHCS’ monitoring of Subgrantee’s performance under this Agreement. Subgrantees shall resolve findings and other required corrective actions within the timeframes reasonably given by OHCS by written report or otherwise.

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

If follow up/corrective actions are requested, the HSS Program Compliance Officer will follow up directly with the sub-grantee program staff. The monitoring will not be closed until all follow up items/corrective actions are satisfactorily completed

Review Closing

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

DRAFT