

We are providing a Microsoft Word version of the revised draft Model State Plan (MSP) for CSBG state agencies to use for planning and development of their FY 2016 State plan. While OMB may require further adjustments to the MSP after they have finalized their review (currently undergoing), this document is the final clearance version.

Community Services Block Grant (CSBG) Model State Plan

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Mandatory Grant Application SF-424

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SECTION 1

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

1.1. Provide the following information in relation to the lead agency designated to administer CSBG in the State, as required by Section 676(a) of the CSBG Act. The following information should mirror the information provided on the Application for Federal Assistance, SF-424M.

1.1a. Lead agency [Narrative, 2500 Characters] Oklahoma Department of Commerce

1.1b. Cabinet or administrative department of this lead agency [Check One and narrative where applicable]

- Community Services Department
- Human Services Department
- Social Services Department
- Governor's Office
- Community Affairs Department
- Other, describe: [Narrative, 2500 characters]

1.1c. Division, bureau, or office of the CSBG authorized official [Narrative, 2500 Characters]

Community Development Service

1.1d. Authorized official of the lead agency [Narrative, 2500 Characters]

Instructional note: 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.

Vaughn Clark, Director, Community Development Service

1.1e. Street address [Narrative, 2500 characters] 900 N. Stiles Ave

1.1f. City [Narrative, 2500 characters] Oklahoma City

1.1g. State [Dropdown] Oklahoma

1.1h. Zip [Narrative, 5 characters] 73104

1.1i. Telephone number and extension [Narrative, 10 – 15 characters which includes option for 5 digit extension] 405-815-5370

1.1j. Fax number [Narrative, 10 characters] 405-815-5344

1.1k. Email address [Narrative, 2500 characters] vaughn_clark@okcommerce.gov

1.1l. Lead agency website [Narrative, 2500 characters] www.okcommerce.gov

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

Instructional Note: The State CSBG point of contact should be the person that will be the main point of contact for CSBG within the State.

1.2a. Agency name [Narrative, 2500 characters] [Oklahoma Department of Commerce](http://www.okcommerce.gov)

1.2b. Name of the point of contact [Narrative, 2500 characters]

[Marshall Vogts, Director of Programs](mailto:Marshall_Vogts@okcommerce.gov)

1.2c. Street address [Narrative, 2500 characters] [900 N. Stiles Ave.](http://www.okcommerce.gov)

1.2d. City [Narrative, 2500 characters] [Oklahoma City](http://www.okcommerce.gov)

1.2e. State [Dropdown] [Oklahoma](http://www.okcommerce.gov)

1.2f. Zip [Narrative, 5 characters] [73104](http://www.okcommerce.gov)

1.2g. Point of contact telephone number [Narrative, 10 – 15 characters which includes option for entering up to 5 digit extension] [\(405\) 815-5339](http://www.okcommerce.gov)

1.2h. Fax number [Narrative, 10 characters] [\(405\) 815-5344](http://www.okcommerce.gov)

1.2i. Point of contact email address [Narrative, 2500 characters]
Marshall_Vogts@okcommerce.gov

1.2j. Point of contact agency website [Narrative, 2500 characters] www.okcommerce.gov

1.3. **Designation Letter:** Attach the State's official CSBG designation letter. If either the governor or designated agency has changed, update the letter accordingly. **[Attach a document]**

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.



Mary Fallin
Office of the Governor
State of Oklahoma

August 30, 2011

Seth Hassett, Director
Division of State Assistance
Office of Community Services
The US Department of Health
and Human Services
200 Independence Avenue, Southwest
Washington, DC 20201

Dear Mr. Hassett:

This letter shall serve as official notification that I have designated Mr. Vaughn Clark, Division Director, Community Development, Oklahoma Department of Commerce, to sign all state plans and grant awards for all United States Department of Health and Human Services programs.

Should you require additional information, please advise.

We look forward to a continued excellent working relationship with your office. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Mary Fallin".

Mary Fallin
Governor

217 State Capitol • 3300 North Lincoln Boulevard • Oklahoma City • OK • 73105

SECTION 2

State Legislation and Regulation

- 2.1. **CSBG State Legislation:** Does the State have a statute authorizing CSBG? Yes No
- 2.2. **CSBG State Regulation:** Does the State have regulations for CSBG? Yes No
- 2.3. If yes was selected in item 2.1 or 2.2, attach a copy (or copies) of legislation and/or regulations or provide a hyperlink(s), as appropriate. **[Attach a document and/or provide a link]**

<http://www.oar.state.ok.us/oar/codedoc02.nsf/All/3413904F2680C8FA86257DA40061D844?OpenDocument>

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§74-5034. Purpose of Sections 5035 to 5040.

It is the purpose of Sections 41 through 46 of this act to delineate a system of community action agencies to enhance and stimulate economic opportunity and self-sufficiency for all citizens. It is hereby found and determined that community action agencies provide services which are basic and essential to the well-being of low-income and economically disadvantaged persons of this state. It is further determined that the delivery of such services should be officially recognized in order to assure the effective and efficient continuation of such services and to solve existing problems of human service delivery systems.

Added by Laws 1986, c. 207

§74-5035. Community Service Block Grant Funds - Receipt - Use - Rules and regulations - Allocation to community action agencies - Consolidation of programs.

A. The Oklahoma Department of Commerce is hereby designated to receive Community Services Block Grant Funds appropriated, authorized or allocated for usage within the State of Oklahoma by the United States Government. These funds shall be used for, but not limited to the following:

1. Provide a range of services and activities having major impact on causes and effects of poverty in the community or those areas of the community where poverty is a particularly acute problem;
2. Provide activities designed to assist low-income participants including the elderly poor;
 - a. to secure and retain meaningful employment,
 - b. to attain an adequate education,
 - c. to make better use of available income,
 - d. to obtain and maintain adequate housing and a suitable living environment,
 - e. to obtain emergency assistance,
 - f. to remove obstacles and solve problems which block the achievement of self-sufficiency,
 - g. to make more effective use of other programs;
3. Provide on an emergency basis for the provision of such supplies and services, nutritious foodstuffs and related services, as may be necessary to counteract conditions of starvation and malnutrition among the poor or temporarily indigent;
4. Coordinate and establish linkages between government and other social services programs to assure the effective delivery of such services to low-income individuals; and
5. Encourage the use of entities in the private sector of the community in efforts to eliminate poverty in the community.

B. The Oklahoma Department of Commerce shall promulgate and ensure compliance on rules, regulations, policies and procedures to carry out all programs of the Community Services Block Grant.

C. At least ninety percent (90%) of the Community Service Block Grant funds received by the Oklahoma Department of Commerce for the state from the United States Government shall be allocated to community action agencies, as defined in this act.

2.4. State Authority: Select a response for each question about the State statute and/or regulations authorizing CSBG:

2.4a. Did the State legislature enact authorizing legislation, or amendments to an existing authorizing statute, last year? Yes No

2.4b. Did the State establish or amend regulations for CSBG last year? Yes No

2.4c. Does the State statutory or regulatory authority designate the bureau, division, or office in the State government that is to be the State administering agency? Yes No

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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. **[Narrative, 2500 characters]**

The Oklahoma Department of Commerce is the primary economic development entity in the state. Its mission is to create and deliver high-impact solutions that lead to prosperous lives and communities for all Oklahomans.

We recruit new businesses to the state by promoting the great assets we have for businesses to succeed. We work to foster an entrepreneurial culture and infrastructure in Oklahoma to encourage the start-up of new businesses and partner with communities to ensure existing businesses grow and prosper.

We partner with city and county elected officials and community leaders to help raise incomes, improve the quality of life for local residents, and help local businesses to thrive. Through federal funding, we oversee vital infrastructure and human services investments that help position communities as favorable for business attraction.

- 3.2. State Plan Goals:** Describe the State’s CSBG-specific goals for State administration of CSBG under this State Plan. **[Narrative, 2500 characters]**

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

Note: This information is associated with State Accountability Measure 1Sa(i) and may pre-populate the State’s annual report form.

The goals of the State CSBG office are:

1. Timely distribution of funds to eligible entities
2. Monitoring of eligible entities
3. To provide training and technical assistance to assist eligible entities in complying with CSBG program objectives, ROMA and Organizational Standards

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

- 3.3a. Analysis of [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)
- Other data (describe) **[Narrative, 2500 characters]**
- Eligible entity community needs assessments
- Eligible entity plans
- Other information from eligible entities, e.g., State required reports (describe) **[Narrative, 2500 characters]**

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

- Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)
- State community action association and regional CSBG T & TA providers
- State partners and/or stakeholders (describe) **[Narrative, 2500 characters]**
- National organizations (describe) **[Narrative, 2500 characters]**
- Other (describe) **[Narrative, 2500 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. **[Narrative, 2500 Characters]**

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

Members of the Board of Directors of the State Association developed, and the Board as a whole voted to support, a funding distribution plan that uses more current census data while lessening the impact on the budgets of those eligible entities whose proportional share of funds would decrease as the result of population changes within the service areas.

The State requested specific information from the eligible entities to assist with the completion of some sections of the plan.

The State provided the eligible entities opportunity to review the final plan draft prior to it being made available for public inspection

If this is the first year filling out the automated State Plan, skip the following question.

3.4b. Performance Management Adjustment: How has the State adjusted State Plan development procedures under this State Plan, as compared to past plans, in order 1) to encourage eligible entity participation and 2) to 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. **[Narrative, 2500 Characters]**

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

Not applicable – first year

If this is the first year filling out the automated State Plan, skip the following question.

3.5. Eligible Entity Overall Satisfaction: Provide the State’s target for eligible entity Overall Satisfaction during the performance period: _____. **[Numerical, 3 digits]**

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. (See information about the ACSI in the CSBG State Accountability Measures document.)

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

Not applicable – first year

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SECTION 4

CSBG Hearing Requirements

- 4.1. Public Inspection:** Describe how the State made this State Plan, or revision(s) to the State Plan, available for public inspection, as required under Section 676(e)(2) of the Act. **[Narrative, 2500 Characters]**

Two weeks prior to the public hearing the plan was made available on the State CSBG office's website and a press release was issued to its statewide distribution list of television stations and newspapers. The website included an email address where comments could be sent and the time and location of the public hearing. The website link was emailed to the eligible entity executive directors and the executive director of the state association. Copies of the plan were also available at the hearing.

- 4.2. Public Notice/Hearing:** Describe how the State ensured there was sufficient time and statewide distribution of notice of the public hearing(s) to allow the public to comment on the State Plan, as required under 676(a)(2)(B) of the CSBG Act. **[Narrative, 2500 Characters]**

Two weeks prior to the public hearing the plan was made available on the State CSBG office's website and a press release was issued to its statewide distribution list of television stations and newspapers. The website included an email address where comments could be sent and the time and location of the public hearing. The website link was emailed to the eligible entity executive directors and the executive director of the state association. Copies of the plan were also available at the hearing.

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

Instructional Note: 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 [Select an option]
[Select a date]	[Narrative, Insert Address]	<ul style="list-style-type: none"> • Public • Legislative • Combined
ADD a ROW function Note: rows will be able to be added for each additional hearing		
08/19/2015	Oklahoma Assn of Community Action Agencies 605 Centennial Blvd, Edmond, OK 73013	Public
04/09/2014	Oklahoma Capitol Building	Legislative

4.4. Attach supporting documentation or a hyperlink for the public and legislative hearings. **[Attach a document or provide a hyperlink.]**

Public – press release, email to EDs, sign-in sheet – TO BE ADDED

Legislative

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Oklahoma State Senate

2300 N. Lincoln • Oklahoma City, Oklahoma 73105 • (405) 524-0126
<http://www.oksenate.gov>



MEETING NOTICE

COMMITTEE ON APPROPRIATIONS

SUBCOMMITTEE ON NATURAL RESOURCES AND REGULATORY SERVICES

SUBJECT: Third Meeting
DATE: **Wednesday, April 9, 2014**
TIME: **Immediately Following Session**
PLACE: Room 419 A & B, State Capitol Building

Agenda:

1. Department of Commerce Budget Hearing – Community Services Block Grant Program
Presentation By - Vaughn Clark, Division Director
2. Other Business.

Senator Ron Justice, Chair
Senator, Eddie Fields, Vice Chair

SECTION 5 CSBG Eligible Entities

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

CSBG Eligible Entity	Public or Nonprofit	Type of Entity (choose all that apply)	Geographical Area Served by county (Provide all counties)	Brief Description of "Other"
[Narrative, 2500 characters]	[Select Public or Nonprofit]	<ul style="list-style-type: none"> • Community Action Agency • Limited Purpose Agency • Local Government Agency • Migrant or Seasonal Farmworker Organization • Tribe or Tribal Organization • Other (describe in column 5) 	[Narrative, 2500 characters]	[Narrative, 2500 characters] If "Other" is selected in column 3, provide further detail here
ADD A ROW function Note: rows will be able to be added for each eligible entity funded in the State				

Big Five Community Services	Nonprofit	CAA	Bryan, Carter, Coal, Love, Pontotoc
CAP Tulsa	Nonprofit	CAA	Tulsa
Central Oklahoma Community Action Agency	Nonprofit	CAA	Cleveland, Lincoln, Logan, Payne, Pottawatomie, Seminole
Community Action Agency of Oklahoma City and Oklahoma/Canadian Counties	Nonprofit	CAA	Canadian, Oklahoma
Community Action Development Corporation	Nonprofit	CAA	Beckham, Cotton, Jefferson, Kiowa, Roger Mills, Tillman, Washita
Community Action Resource & Development	Nonprofit	CAA	Mayer, Nowata, Rogers, Wagoner, Washington
Community Development Support Association	Nonprofit	CAA	Garfield, Grant
Deep Fork Community Action Foundation	Nonprofit	CAA	Hughes, McIntosh, Okfuskee, Okmulgee
Delta Community Action Foundation	Nonprofit	CAA	Garvin, McClain, Stephens
Great Plains Improvement Foundation	Nonprofit	CAA	Comanche
INCA Community Services	Nonprofit	CAA	Atkoa, Johnston, Marshall, Murray

KI BOIS Community Action Foundation	Nonprofit	CAA	Haskell, Latimer, LeFlore, Pittsburg, Sequoyah
Little Dixie Community Action Agency	Nonprofit	CAA	Choctaw, McCurtain, Pushmataha
Muskogee County Community Action Foundation	Nonprofit	CAA	Muskogee
Northeast Oklahoma Community Action Agency	Nonprofit	CAA	Adair, Cherokee, Craig, Delaware, Ottawa
Opportunities, Inc.	Nonprofit	CAA	Alfalfa, Beaver, Blaine, Cimarron, Custer, Dewey, Ellis, Harper, Kingfisher, Major, Texas, Woods, Woodward
Southwest Oklahoma Community Action Group	Nonprofit	CAA	Greer, Harmon, Jackson
United Community Action Program	Nonprofit	CAA	Creek, Kay, Noble, Osage, Pawnee
Washita Valley Community Action Council	Nonprofit	CAA	Caddo, Grady

5.2. Total number of CSBG eligible entities: **##** [This will automatically update based on chart in 5.1]

5.3. **Changes to Eligible Entities List:** Has the list of eligible entities under item 5.1 changed since the State’s last State Plan submission? If yes, briefly describe the changes. Yes No
[If yes is selected – Narrative, 2500 characters]

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

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

SECTION 6

Organizational Standards for Eligible Entities

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

- The State will use the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138)
- The State will use an alternative set of organizational standards **[Attach supporting documentation if this option is selected]**

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

6.2a. If yes was selected in item 6.2, describe the State's proposed minor modification to the COE-developed organizational standards, and provide a rationale. **[Narrative, 2500 characters]**

6.3. How will/has the State officially adopt(ed) organizational standards for eligible entities in the State in a manner consistent with the State's administrative procedures act? If "Other" is selected, provide a timeline and additional information, as necessary. **[Check all that applies and narrative where applicable]**

- Regulation
- Policy
- Contracts with eligible entities
- Other, describe: **[Narrative, 2500 characters]**

6.4. How will the State assess eligible entities against organizational standards, as described in IM 138? **[Check all that applies]**

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

6.4a. Describe the assessment process. **[Narrative, 2500 characters]**

Oklahoma eligible entities will be required to complete an annual self-assessment of the organizational standards using the Self-Assessment Tool for Private CEEs developed by

the Community Action Partnership. The results of the self-assessment will be validated by state monitors through desktop monitoring during the year and through the on-site CSBG monitoring visit.

- 6.5. Will the State make exceptions in applying the organizational standards for any eligible entities due to special circumstances or organizational characteristics, as described in IM 138?
 Yes No

6.5a. If yes was selected in item 6.5, list the specific eligible entities the State will exempt from meeting organizational standards, and provide a description and a justification for each exemption. **[Narrative, 2500 characters or attach document]**

If this is the first year filling out the automated State Plan, skip the following question.

- 6.6. **Performance Target:** What percentage of eligible entities in the State does the State expect will meet all the State-adopted organizational standards in the next year? **[Insert a percentage]**

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

Not applicable – First year

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. **[Check one and narrative where applicable]**

- Historic
- **Base + Formula**
- Formula Alone
- Formula with Variables
- Hold Harmless + Formula
- Other **[Narrative, 2500 Characters]**

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

7.2. Planned Allocation: Specify the planned allocation of 90 percent funds to eligible entities, as described under Section 675C(a) of the CSBG Act. The estimated allocations may be in dollars or percentages. For each eligible entity receiving funds, provide the Funding Amount in either dollars (columns 2 and 4) or percentage (columns 3 and 5) for the fiscal years covered by this plan.

Planned CSBG 90 Percent Funds				
CSBG Eligible Entity	Year One		Year Two	
	Funding Amount \$	Funding Amount %	Funding Amount \$	Funding Amount %
Will be auto-populated from Section 5, Table 5.1, Column 1	Enter either the dollar amount or percentage for each eligible entity for the first year that this plan covers		Enter either the dollar amount or percentage for each eligible entity for the second year that this plan covers (If this is a one-year plan, these columns can be left blank)	
Total	Totals will be auto-populated		Totals will be auto-populated	
EE	Yr 1 AMT		Yr 2 AMT	
Big Five Community Services	333,213		331,363	
CAP Tulsa	831,900		843,585	
Central Oklahoma Community Action Agency	782,541		791,016	
Community Action Agency of Oklahoma City and Oklahoma/Canadian Counties	1,343,921		1,347,487	
Community Action Development Corporation	224,389		221,110	

Community Action Resource & Development	360,140	363,981
Community Development Support Association	130,793	130,546
Deep Fork Community Action Foundation	248,731	247,012
Delta Community Action Foundation	201,803	198,935
Great Plains Improvement Foundation	216,460	217,186
INCA Community Services	155,007	154,024
KI BOIS Community Action Foundation	411,222	405,629
Little Dixie Community Action Agency	220,532	218,332
Northeast Oklahoma Community Action Agency	410,937	410,722
Muskogee County Community Action Foundation	163,361	163,460
Opportunities, Inc.	375,081	371,815
Southwest Oklahoma Community Action Group	112,509	111,014
United Community Action Program	382,029	379,371
Washita Valley Community Action Council	180,330	178,311
	7,084,899	7,084,899

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). **[Narrative, 2500 Characters]**

Upon receipt of the current allocation Grant Award the State distributes funds to eligible entities as follows:

- The State applies formula to allocation to determine each eligible entity’s distribution amount – 5 days
- The State prepares a funding list and routes for approval to Service Director thru Director of Programs and Programs Manager – 5 days
- The State prepares award letters and distributes to eligible entities – 5 days

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

7.4a. If no, describe State procedures to ensure funds are made available to eligible entities consistently and without interruption. **[Narrative, 2500 Characters]**

Funds are made available to eligible entities no later than 30 days of receipt of the current allocation Grant Award with two exceptions. Contracts with eligible entities begin on the calendar year and run 21 months so the first allocation is not available until January. This process is consistently followed every grant year. The second exception is when a small allocation is received we may opt to hold it and distribute it in combination with the remaining larger allocation for that quarter when it is received.

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

If this is the first year filling out the automated State Plan, skip the following question.

7.5. Performance Management Adjustment: How is the State 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. **[Narrative, 2500 Characters]**

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

Not applicable – First year

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

7.6. What amount of State CSBG funds does the State plan to allocate for administrative activities, under this State Plan? The estimate may be in dollars or a percentage. **[Numeric response, specify \$ or %]** 5%

7.7. How many State staff positions will be funded in whole or in part with CSBG funds under this State Plan? **[Insert a number between 0 – 99]** 13

7.8. How many State Full Time Equivalents (FTEs) will be funded with CSBG funds under this State Plan? **[Insert a number between 0 – 99]** 3.3

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

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

If yes was selected, describe how the State plans to use remainder/discretionary funds in the table below.

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

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

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

Note: This information is associated with State Accountability Measures 3Sa; the responses may pre-populate the State’s annual report form.

Use of Remainder/Discretionary Funds					
Remainder/ Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Year One		Year Two		Brief description of services/activities
	Planned \$	Planned %	Planned \$	Planned %	
a. Training/technical assistance to eligible entities					[Not Fillable] These planned services/activities will be described in State Plan item 8.1
b. Coordination of State-operated programs and/or local programs	[Enter either a planned \$ or % for each item listed for the first year that this plan covers. If entering a percentage, the percentages must total 100%.]		[Enter either a planned \$ or % for each item listed second year that this plan covers. If entering a percentage, the percentages must total 100%.]		[Optional Narrative, 2500 characters] These planned services/activities will be described in State Plan section 9, State Linkages and Communication.
c. Statewide coordination and communication among eligible entities					[If this is a one-year plan, these columns can be left blank]

Use of Remainder/Discretionary Funds					
Remainder/ Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Year One		Year Two		Brief description of services/activities
	Planned \$	Planned %	Planned \$	Planned %	
d. Analysis of distribution of CSBG funds to determine if targeting greatest need					[Narrative, 2500 characters]
e. Asset-building programs					[Narrative, 2500 characters]
f. Innovative programs/ activities by eligible entities or other neighborhood groups					[REQUIRED Narrative, 2500 characters] Describe here or attach additional information.
g. State charity tax credits					[Narrative, 2500 characters]
h. Other activities, specify_____					[Narrative, 2500 characters]
Totals	Auto-Calculated	Auto-Calculated	Auto-Calculated	Auto-Calculated	

Use	Yr 1 Amt	Y2 Amt	Description
A	40,000	40,000	Training
B			
C	80,000	80,000	State Association – Operational Support
D			
E	90,000	90,000	VITA
F	87,605	87,605	Eligible Entities - these funds are made available to the eligible entities upon submission of a request by the entity for pilot programs, projects or other activities. Examples of past programs have been a distance learning center, a community garden, and supplies to assistance with clean up after a tornado
G			
H	96,000	96,000	Annual fees for eligible entities for our web-based data collection system CAPTAIN

7.10. What types of organizations, if any, does the State plan to work with (by grant or contract using remainder/discretionary funds) to carry out some or all of the activities in table 7.9. **[Check all that apply and narrative where applicable]**

- CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds) **[Narrative, 2500 characters] 18**
- 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]**
- None (the State will carry out activities directly)

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

If this is the first year filling out the automated State Plan, skip the following question.

7.11. Performance Management Adjustment: How is the State adjusting 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. **[Narrative, 2500 Characters]**

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

Not applicable – first year

SECTION 8 State Training and Technical Assistance

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

Note: 8.1 is associated with State Accountability Measure 3Sc and may pre-populate the State’s annual report form.

Training and Technical Assistance			
Fiscal Year (Y) Quarter (Q) / Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
Dropdown options: <ul style="list-style-type: none"> • FY1 – Q1 • FY1 – Q2 • FY1 – Q3 • FY1 – Q4 • FY2 – Q1 • FY2 – Q2 • FY2 – Q3 • FY2 – Q4 • Ongoing / Multiple Quarters • All quarters 	Toggle Options: <ul style="list-style-type: none"> • Training • Technical Assistance • Both 	Dropdown Options: <ul style="list-style-type: none"> • Fiscal • Governance/Tripartite Boards • Organizational Standards – General • Organizational Standards – for eligible entities with unmet standards on Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs) • Correcting Significant Deficiencies Among Eligible Entities • Reporting • ROMA • Community Assessment • Strategic Planning • Monitoring • Communication • Technology • Other 	[Narrative, 2500 characters] If “Other” is selected in column 3, describe in this column
ADD a ROW function Note: Rows will be able to be added for each additional training			
Timeframe	What	Topic	Description (Other Only)
Ongoing/Multiple Quarters	TA	Fiscal	
Ongoing/Multiple Quarters	Both	Governance/Tripartite Boards	

Ongoing/Multiple Quarters	TA	Org Standards - General	
Ongoing/Multiple Quarters	TA	Org Standards – TAPs & QIPs	
Ongoing/Multiple Quarters	Both	Reporting	
Ongoing/Multiple Quarters	Both	ROMA	
Ongoing/Multiple Quarters	Both	Community Assessment	
Ongoing/Multiple Quarters	Both	Strategic Planning	
Ongoing/Multiple Quarters	Both		Community Action Plan
FY1 Qtr 2	Training	Other	Risk Assessment
FY2 Qtr 3	Training	Other	Theory of Change
FY2 Qtr 4	Training	Other	ROMA Next Generation

SAMPLE: The following is a sample of how this table can be completed:

Training and Technical Assistance			
Fiscal Year (FY) Quarter (Q) / Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
FY1 - Q1	Training	Fiscal	
FY1 - Q1	Technical Assistance	Monitoring	
FY1 - Q3	Both	Other	Conference to include but T/TA
FY1 - Q4	Training	ROMA	
Choose an item.	Choose an item.	Choose an item.	

8.1a. The planned budget for the training and technical assistance plan (as indicated in the Remainder/Discretionary Funds table in item 7.9): **[Prepopulated with the budget allocation for years one and two under 7.9a]**

If this is the implementation year for organizational standards, skip question 8.2.

8.2. Does the State have in place Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs) 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).

Not applicable – First year

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

- CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds) **[Narrative, 2500 characters]** 1 – One of our NCRT is employed by an eligible entity. We may provide funds for her time/travel for providing any needed T&TA regarding ROMA Implementation
- Other community-based organizations
- State Community Action association – One of our NCRT is employed by our State Association. We provide funds for operational support to the Association.
- Regional CSBG technical assistance provider(s)
- National technical assistance provider(s) – We plan to utilize the National Association for State Community Services Programs NASCSP to provide some training.
- Individual consultant(s)
- Tribes and Tribal Organizations
- Other **[Narrative, 2500 characters]**

If this is the first year filling out the automated State Plan, skip the following question.

8.4. Performance Management Adjustment: How is the State adjusting 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. **[Narrative, 2500 Characters]**

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

Not applicable – First year

SECTION 9 State Linkages and Communication

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

- 9.1. State Linkages and Coordination at the State Level:** Describe the linkages and coordination at the State level that the State plans to create or maintain to ensure increased access to CSBG services to low-income people and communities under this State Plan and avoid duplication of services (as required by the assurance under Section 676(b)(5)). Describe or attach additional information as needed. **[Check all that apply from the list below and provide a Narrative, 2500 Characters]**

Note: This response will link to the corresponding CSBG assurance, item 14.5. In addition, this item is associated with State Accountability Measure 7Sa and may pre-populate the State's annual report form.

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

- 9.2. State Linkages and Coordination at the Local Level:** Describe the linkages and coordination at the local level that the State plans to create or maintain with governmental and other social services, especially antipoverty programs, to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by assurances under Sections 676(b)(5) and (b)(6)). Attach additional information as needed. **[Narrative, 2500 Characters]**

Note: This response will link to the corresponding CSBG assurances, items 14.5 and 14.6.

State linkages and coordination occur at the state level. Eligible entities create and maintain linkages and partnerships at the local level.

9.3. Eligible Entity Linkages and Coordination

9.3a State Assurance of Eligible Entity Linkages and Coordination: Describe how the State will assure that the eligible entities will coordinate and establish linkages to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by the assurance under Section 676(b)(5)). Attach additional information as needed. **[Narrative, 2500 Characters]**

Each eligible entity is required to develop a Community Action Plan describing the community-wide approach it will take when making decisions on the anti-poverty programs to be administered by the agency. The Plan must include a description of the current service delivery system targeted to low-income individuals and families in the service area including services offered by the entity and services provided by other agencies, a description of how the agency has coordinated and/or partnered with other local agencies to address gaps in services, and a description of how CSBG funds will be coordinated with other public and private resources. The plan is reviewed by a state monitor in conjunction with review and execution of the entity's annual funding award.

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

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. **[Narrative, 2500 Characters]**

Note: This response will link to the corresponding CSBG assurance, item 14.3

Eligible entities will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of services to low-income individuals and families by conducting a comprehensive intake assessment and through an individualized referral and case management process unique to each organization. Through this individualized process for each community action program, the eligible entities will identify gaps in services for individuals and families.

Eligible entities use several methods by which they develop linkages to fill identified gaps in services. Examples include establishing additional linkages with current partner's organizations, knowledge of available community resources obtained by serving on other community service provider committees or groups, peer agency collaboration and professional and/or personal networking.

In addition, during annual strategic planning, eligible entities will brainstorm ways to fill identified gaps and identify strategies for developing linkages and/or the coordination of community partnerships to assure effective service delivery and avoid duplication of services. Eligible entities address linkages in their annual Community

Action Plan and their needs assessment summary that is submitted with their annual funding application.

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 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, 2500 Characters]**

9.4b. If the State selected “no” under item 9.4, describe the coordination of employment and training activities, as defined in Section 3 of WIOA, by the State and by eligible entities providing activities through the WIOA system. **[Narrative, 2500 Characters]**

While no eligible entities provide activities through the WIOA system as defined in Section 3 of the WIOA, eligible entities do make referrals to local WIOA agencies. Some eligible entities partner with the local Workforce agency to place WIOA clients at eligible entity offices and/or service locations such as food pantries and kitchens for job training. One eligible entity executive director serves on the local Workforce Investment Board (WIB) in an advisory capacity and participates in local forums for each WIOA located within that eligible entity’s communities.

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). **[Narrative, 2500 Characters]**

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

The state CSBG office receives LIHEAP funds from the Oklahoma State Department of Health and Human Services (DHS). In turn, the state CSBG office provides those LIHEAP funds to eligible entities to provide weatherization services. DHS uses their retained LIHEAP funds to provide emergency energy crisis intervention services thru their local county offices. Eligible entities receive county DHS LIHEAP client data to use for recruitment of weatherization program clients as needed.

- 9.6. State Assurance: Faith-based Organizations, Charitable Groups, Community Organizations:** Describe how the State will assure local eligible entities will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations, according to the State’s assurance under Section 676(b)(9) of the CSBG Act. **[Narrative, 2500 characters OR attach a document]**

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

Each eligible entity is required to develop a Community Action Plan describing the community wide approach it will take when making decisions on the anti-poverty programs to be administered by the agency. The Plan must include a description of the current service delivery system targeted to low-income individuals and families in the service area. Including services offered by the entity and services provided by other agencies, a description of how the agency has coordinated and/or partnered with other local agencies, including faith-based, charitable and community organizations, to address gaps in services, and a description of how CSBG funds will be coordinated with other public and private resources. The plan is reviewed by a state monitor in conjunction with review and execution of the entity’s annual funding award.

- 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. **[Narrative, 2500 Characters]**

Note: this response will link to the corresponding assurance, item 14.3c.

CSBG funding forms the nucleus of the eligible entities administrative capacity. It supports the planning and program design functions and enables the agency to pursue other public and private resources to address the needs of low-income citizens. Its presence has provided eligible entities the recognition as a stable force in their communities. This measure of stability is their main asset for leveraging other program resources.

Often, CSBG funds provide the catalyst for obtaining other funding by helping provide the staffing resources needed to develop partnerships and linkages to design and implement new or expanded services. An example of this coordination is an eligible entity’s housing program. Staff work to develop new programs for rehabilitation and new housing. Applications for funding are made to Oklahoma Housing Finance Authority, HUD, Oklahoma Department of Commerce, USDA, Federal Home Loan Bank, etc., while staff is salaried in part with CSBG funds. This allows the development of new programs and services, as well as the continuation of established ones.

The use of CSBG funds is critical to the eligible entities. It plays an important role in the agency’s ability to evaluate, plan for and meet community needs. Additionally, CSBG funds provide support for staff salaries for many of the programs and services offered by the eligible entities such as emergency assistance services, housing development and rehabilitation, weatherization, homebuyer education, and asset development.

Eligible entities address coordination of funds in their annual Community Action Plan and needs assessment summary that is submitted with their annual funding application that is reviewed by a state monitor in conjunction with review and execution of the entity's annual funding award.

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. **[Narrative, 2500 Characters]**

The State is regularly involved in many activities that support coordination among eligible entities and the State Association such as the Oklahoma Weatherization and Housing Advisory Council, the Continuum of Care, the Governor's Council on Homelessness, the Region VI Regional Performance and Innovation Consortia and Head Start Collaboration. In addition, the State provides operational funding to the State Association, presents at the Association's monthly Executive Director's meetings, participates and provides training at Association conferences and also facilitates a data standardization group made up of staff from both eligible entities and the Association to discuss consistent program outcome reporting.

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

Communication Plan			
Topic	Expected Frequency	Format (drop down)	Brief Description of "Other"
[Narrative, 2500 characters]	Dropdown Options: <ul style="list-style-type: none"> • Daily • Weekly • Twice-Monthly • Monthly • Quarterly • Semi-Annually • Annually • Other 	Dropdown Options: <ul style="list-style-type: none"> • Newsletter • Mailing • Meetings/Presentation • Blog • Email • Website • Social Media • Other 	[Narrative, 2500 characters] If "Other" is selected in columns 2 and/or 3, describe in this column
ADD a ROW function <i>Note: As many rows that are needed will be able to be added</i>			
Assn Board of Directors Mtgs	Monthly	Meeting/Presentation	
Data Standardization Group	Quarterly	Meeting/Presentation	
ROMA Implementation	Other	Email	The State has developed an FAQ related to ROMA Implementation. It is updated and re-

Communication Plan			
Topic	Expected Frequency	Format (drop down)	Brief Description of "Other"
			distributed as new questions are received.
Organizational Standards	Other	Email	The State has developed an FAQ related to Organizational Standards. It is updated and re-distributed as new questions are received.
On-line CAA Program Implementation Manual	Other	Website	The manual is always available on-line. It is updated as needed.
On-line CAA Program Implementation Manual	Other	Email	The manual is always available on-line. It is updated as needed. A notification email is sent to eligible entities when an update has occurred.
State Association Conferences	Semi-Annually	Meeting/Presentation	
State Plan Development/Revisions	Other	Email	A draft of the two-year state plan or revisions are sent to eligible entities and the Association for review and input prior to the final draft being made available for public inspection and comment
State Plan Public Hearing	Other	Email	Email notification is sent to eligible entities and the Association when the public hearing date is set
State Plan Public Hearing	Other	Meeting/Presentation	Notification of the date of the public hearing is announced at the Association's Board of Directors Meeting
CSBG Legislative Hearing	Other	Email	Email notification is sent to eligible entities and the Association

Communication Plan			
Topic	Expected Frequency	Format (drop down)	Brief Description of "Other"
			when the legislative hearing date is set
CSBG Legislative Hearing	Other	Meeting/Presentation	Notification of the date of the legislative hearing is announced at the Association's Board of Directors Meeting
State Accountability Measures performance	Other	Email	The State will provide feedback to eligible entities and the Association upon receipt of feedback from OCS
State Accountability Measures performance	Other	Meeting/Presentation	The State will provide feedback to eligible entities and the Association upon receipt of feedback from OCS
Monitoring Visits	Annually	Other	The State monitors each eligible entity and the Association on-site, in accordance with the three-year requirement at a minimum, however we strive to monitor each annually
Technical Assistance	Daily	Other	The State routinely provides technical assistance to eligible entities by phone, email and meeting.
Oklahoma Weatherization & Housing Advisory Council	Monthly	Meeting/Presentation	
DHS - LIHEAP	Quarterly	Email	
Continuum of Care	Other	Meeting/Presentation	The Continuum of Care meets bi-monthly
The Governor's Council on Homelessness	Other	Meeting/Presentation	The Governor's Council on Homelessness meets bi-monthly

Communication Plan			
Topic	Expected Frequency	Format (drop down)	Brief Description of "Other"
Head Start Collaboration	Other	Meeting/Presentation	Head Start Collaboration meets three times per year
Region VI Regional Performance and Innovation Consortia	Monthly	Meeting/Presentation	

9.10. Feedback to Eligible Entities and State Community Action Association: Describe how the State will provide feedback to local entities and State Community Action Associations regarding performance on State Accountability Measures. **[Narrative, 2500 Characters]**

Note: This information is associated with State Accountability Measure 5S(iii). The measure indicates feedback should be provided within 60 calendar days of the State getting feedback from OCS.

The State will provide feedback to local entities and the State Association regarding performance on State Accountability Measures by email to the executive directors of the eligible entities and the State Association and by presenting results at a State Association's Executive Directors meeting.

If this is the first year filling out the automated State Plan, skip the following question.

9.11. Performance Management Adjustment: How is the State adjusting 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. **[Narrative, 2500 Characters]**

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

Not applicable – first year

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.

For States that have a monitoring approach that does not fit within the table parameters, attach the State’s proposed monitoring schedule.

Note: This information is associated with State Accountability Measure 4Sa(i); this response may pre-populate the State’s annual report form.

CSBG Eligible Entity	Review Type	Target Date	Date of Last Full Onsite Review (if applicable)	Brief Description of “Other”
Will auto-populate from item 5.1	Dropdown Options: <ul style="list-style-type: none"> • Full onsite • Newly Designated • Follow-up • Other • No review 	Dropdown Options: <ul style="list-style-type: none"> • FY1 Q1 • FY1 Q2 • FY1 Q3 • FY1 Q4 • FY2 Q1 • FY2 Q2 • FY2 Q3 • FY2 Q4 	Select a date	[Narrative, 2500 characters] If “Other” is selected in column 2, describe in this column

EE	Type	Target Date	Last Review	Description OTHER
Big Five Community Services	Full onsite	FY1 Q1	10/28/2014	
CAP Tulsa	Full onsite	FY1 Q1	10/27/2014	
Central Oklahoma Community Action Agency	Full onsite	FY1 Q3	06/16/2015	
Community Action Agency of Oklahoma City and Oklahoma/Canadian Counties	Full onsite	FY1 Q2	03/02/2015	
Community Action	Full onsite	FY1 Q3	04/14/2015	

CSBG Eligible Entity	Review Type	Target Date	Date of Last Full Onsite Review (if applicable)	Brief Description of "Other"
Development Corporation				
Community Action Resource & Development	Full onsite	FY1 Q4	09/30/2014	
Community Development Support Association	Full onsite	FY1 Q4	07/27/2015	
Deep Fork Community Action Foundation	Full onsite	FY1 Q3	05/05/2015	
Delta Community Action Foundation	Full onsite	FY1 Q1	10/28/2014	
Great Plains Improvement Foundation	Full onsite	FY1 Q4	08/05/2014	
INCA Community Services	Full onsite	FY1 Q4	08/10/2015	
KI BOIS Community Action Foundation	Full onsite	FY1 Q4	07/20/2015	
Little Dixie Community Action Agency	Full onsite	FY1 Q2	03/31/2015	
Muskogee County Community Action Foundation	Full onsite	FY1 Q4	08/25/2014	
Northeast Oklahoma Community Action Agency	Full onsite	FY1 Q3	04/20/2015	
Opportunities, Inc.	Full onsite	FY1 Q2	03/24/2015	
Southwest Oklahoma Community Action Group	Full onsite	FY1 Q2	03/03/2015	
United Community Action Program	Full onsite	FY1 Q4	09/09/2014	
Washita Valley Community Action Council	Full onsite	FY1 Q1	12/02/2014	

10.2. Monitoring Policies: Provide a copy of State monitoring policies and procedures by attaching and/or providing a hyperlink. **[Attach a document or add a link]**

Attached is The CET Liaison Manual.

CAA Rating

The monitoring process is tailored specifically to key-in problems that would trigger “red flags” at an agency. Day-to-day contact along with the annual monitoring process, are all key factors in determining the overall health of the agency. It should be noted that all CAPs are different but the key factors that determine health are the same. ODOC utilizes a status scale which incorporates seven key areas of community action. By assessing all areas of this scale, we can closely determine the overall health of the agency. Those areas include:

1. Financial Management
2. Agency Management
3. Programs and Services
4. Human Resources
5. Community Relations
6. Board of Directors
7. ROMA

The agencies are rated on a sliding scale. The categories are:

1. Thriving
2. Safe
3. Stable
4. Vulnerable
5. In-Crisis

Agency Management

Agency management is a factor where there are not many black and white areas. Areas that can readily be assessed are areas such as timely submission of reports, reporting (data is/isn't entered regularly into CAPTAIN or equivalent), and accurate and detailed RFAs. Agency management, in reality, touches all seven areas that fall under the Agency Status scale.

Typically strong management will lead to all of the other six areas being strong; however, it is important that all areas be evaluated and assessed. With a strong agency you will see creative staff and have little turnover, the agency will have many partnerships and will often collaborate with the communities in their service area to address the issues of poverty. The agency's Board is strong and will be a key factor in the success of the agency. Accountability by the Executive Director to the Board is mandatory for a strong agency. The Board members are aware of the needs of their community and set the direction for the agency. Through awareness of the community's needs, the agency will grow both financially (by seeking out new funding sources to support the needed programs) and program wise (by bringing on new programs to address the needs of low-income individuals).

Poor management can lead to high staff turnover, poor community perception, weak board, misrepresentation of services and poorly executed programs. Often corruption will be found in agencies that have reached this status. The Board will generally be a “rubber-stamp” board. The executive director will hand-feed the board reports and information. The Board does not/will not ask for verification or reports to back-up what is being reported to them. The agency will often ignore feedback

from staff, reporting totals will fall – hence clients are not getting served. When clients cannot be provided services when sought, complaints are made and in cases media attention is brought in. At this point, the agency's overall reputation is put in jeopardy.

Financial Management

The health of financial management is determined by reviewing a number of different items during the monitoring. Monthly journal ledgers, transactions, source documentation, controls, funding base, unrestricted income, and monthly reporting are just to name a few. The monitoring tool specifically outlines the required areas to review. Keep in mind, even though the items listed are required, other documentation can be requested when any information reviewed is unclear or appears sketchy. Procurement records are another item that can provide insight. Do purchases follow the procurement procedures? Is proper approval obtained?

The audit is also a key piece of information in determining the overall financial status of the agency. The audit will give the status of the agency's contracts, cash balance, reserves, and a number of other pertinent details.

Thriving agencies have a highly diverse funding base. The controls the agency utilizes to ensure accountability are in place and followed. The audit shows no questioned costs or findings. Journal logs match perfectly with reports to ODOC and no questionable charges are noted.

An agency in-crisis may have many issues that prevent accountability from either the financial staff or management. Many times you will notice the agency borrowing funds from one program to pay for those in another. This could be from lack of program funds, poorly trained financial staff, or in some cases questionable practices. This will be noted via journal entries or in some cases specific line items in their detailed journals. Funds may be spent for purposes other than what is allowed. There are no controls to ensure accountability and if there are controls present, they are not being followed. Numerous journal entries that have no back-up documentation are noted as well as the lack of source documentation for purchases. Time sheets will not be properly addressed and in some cases payroll taxes are not paid.

Programs and Services

Programs and Services can be evaluated a few different ways. A review of the Agency Programs Chart should show all programs the agency offers. Does the agency address all of the core areas? Do the programs the agency offer address the top three needs in the agency's Community Needs Assessment? What data is being entered into CAPTAIN (or equivalent) or IS data being entered into CAPTAIN (or equivalent)? By determining the number of clients entered into CAPTAIN (or equivalent), a determination can be made of how well the clients are being served under each program. Are complaints being made by clients who have received services? Do clients issue complaints because they have not been served? What do the agency's program files look like? Are they complete, insufficient, or not there all together? By reviewing all the above components, a status can be determined.

Thriving agencies will have Innovative Programs – they think outside the box. The programs are evaluated and assessed and improvements are always sought. The programs offered clearly address the priorities addressed in the needs assessment and the data in CAPTAIN (or equivalent) is consistent and/or shows growth from month to month. Staff are upbeat and excited about their programs and can clearly address their duties and provide information about their programs.

Agencies who are in crisis do not serve the clients. CAPTAIN (or equivalent) data is minimal because clients are not getting served. The program directors cannot plan because they are reacting to the

myriad of problems that are present. No guidance is provided from management which causes the programs to go stagnant.

Human Resources

Human resources play an integral role in the quality of services provided by the agency through the staff it hires. Does the agency have hiring practices in place? If so, are they followed? Do they do background checks on potential employees? Who hires and fires? What about the grievance procedures? Are they utilized? Staff turnover is also a key factor in the assessment. A high turnover rate may show poor training, no orientation, and possibly show the right people are not hired for the right job. Try visiting with a number of staff – either informally or formally – during the monitoring visit. This will give a good insight into the strength of the agency's HR department.

Successful agencies will have a number of long-time staff members. You will often see staff members at all training activities provided by ODOC and/or the Association. Employees are often sent to outside trainings that pertain to their jobs. In discussions with the employees, they will be excited about their job and duties, and will show respect for their supervisors and management.

Agencies that are in-crisis will have a high turnover rate among employees. This can be noted from both daily interactions with your agencies and during the monitoring process. Do you talk to the same person each time or is there constantly someone different? The agency sends few or no employees to Association or ODOC trainings. Little to no agency information is shared between management and program staff. A combination of one or more of these will show a weakness in this area.

Community Relations

Community relations are a very important part of community action. It is imperative that these relationships be strong in order to form strong partnerships and collaborations among various service providers in the area. A strong community action agency will have numerous partnerships in all aspects of the community. Professional staff such as doctors, lawyers, and bankers can play key supportive roles in the agency either by partnering with the agency's programs or by possibly sitting on the Board of Directors.

Partnerships with local service providers are a fundamental part of community action. For services the agency can not directly provide, referrals to partners play a vital role in serving those clients. A positive image in the community equates to substantial donations and community assistance.

A strong and thriving agency will have numerous partnerships in the community. They are well known among other providers. They have a strong relationship with media entities which provide PR services for the agency at little or no charge. The agency has strong networking capabilities and is sought out for assistance in solutions involving low-income individuals. The agency is seen as a resource to help people and is provided with donations for its programs.

An agency that is in crisis has no regular contact with the communities in its area. They are not part of solutions to local problems and are often seen as incompetent or even corrupt and not trustworthy. Because of this lack of trust, the agency does not receive donations or additional funding from outside resources.

Board of Directors

The Board of Directors is the governing body of the community action agency. The Board has one employee and that is the Executive Director. The Board of Directors is an Advocate for the agency and its mission. Some of the responsibilities of the Board include appointing and evaluating the executive director, determining rules, regulations and policies for the agency as well as programmatic and financial oversight.

A thriving Board will take all information provided to them by the executive director and/or staff and through discussion and determines the best course of action for the agency. The Board is active and knows and accepts all the responsibilities associated with being a member. A thriving Board asks questions, requests verification and attends all meetings. A quorum is always achieved.

An in-crisis Board does not attend meetings and regularly does not have a quorum. The Board may tend to micromanage the agency and/or rely solely on the executive director for answers. There is often no discussion on agenda items and little or no verification is requested on items presented to them. Decisions always tend to be yes or totally unanimous. They are unable to read a financial report and therefore often make blind decisions on agency expenditures. The Board members are not aware of their community's needs and the end result is lack of service to low-income clients.

ROMA

ROMA is a key concept of community action and is a form of management practice that incorporates the use of outcomes or results into the administration, management, and operation of an organization. Successful implementation of ROMA originates from a conceptual framework established by the organization. The ROMA cycle is a continuous process of assessment, planning and evaluating results. Results are measured in changed lives and changed conditions for individuals and families living in poverty.

A strong and thriving agency fully integrates ROMA throughout the agency. Staff are aware of the concept and utilize it regularly. The executive director and program directors support the use of ROMA in their agencies. All staff and Board are aware of the importance of ROMA and the agency's outcomes. An agency in crisis does not meet any of the reporting requirements and are totally unaware of the importance of it. The executive director and staff are not committed to ROMA. The Board is totally unaware of the concept.

Effective ROMA Management:

Assessment

1. The agency has a clear anti-poverty mission
2. The agency conducts a Community Needs every two years
3. The agency uses the CNA to identify results, at the *family, agency, and/or community* levels to be achieved in their communities

Planning

4. The agency has a Community Action Plan (CAP) that
 - a. Is anti-poverty focused
 - b. Is directly tied to the needs assessments
 - c. Includes measurable performance goals/outcomes
 - d. Includes services that match the level of need
 - e. Contains outcome indicators
 - f. Identifies performance targets
 - g. Identifies the measurement tools, data, and frequency
5. The agency identifies clear links between indicators being measured and the six national goals (NPIs).
6. The agency has a strategic plan

Implementation

7. The agency has implemented a system to track client services and outcomes throughout the year, for all ODOC and non-ODOC funded programs
8. Data for ALL services is entered by the 20th of each month
9. Data is reviewed periodically by agency management

Achievement of Results

10. The agency measures their results

11. The agency compare results with outcome indicators and projected performance goals outlined in CAP
12. The agency submits their annual IS in a timely, complete and accurate manner

Evaluation

13. The agency uses the information gathered throughout the ROMA cycle to evaluate the effectiveness of the agency's programs, strategic plan, community partnerships and advocacy efforts and updates their Community Action Plan each year
14. The agency adjusts their performance goals as needed to reflect achievable targets as evidenced by actual performance achieved
15. The agency revises or discontinues strategies and services that are found not be consistent with achieving desired outcomes

The Monitoring Process

ODOC policies and procedures require that each community action agency, also referred to as CAPs, be monitored yearly. Initial contact is made with the executive director to schedule training at least two months (60 days) in advance. Once a date has been determined, a formal monitoring letter is sent to the agency that outlines the contracts to be monitored, times of entrance and exit interviews, specific items which will need to be reviewed and a confirmation of any other items that were discussed with the executive director.

During the two month period prior to the visit a desk monitoring is conducted. Desk monitoring includes a review of all CONFAX items, applications/RFAs, other items that the agency has submitted throughout the year as well as a review of any issues or problems the agency faced during the year.

The CONFAX is a binder of documents that contains information about the agency. ODOC requires that the documents in this binder be submitted at least yearly or upon revision. Items in the CONFAX include:

1. Articles of Incorporation
2. By-Laws
3. Affirmative Action Plan
4. Personnel Policies and Procedures
5. Board Membership Roster (submitted with CSBG Application)
6. Board Committee Membership List (submitted with CSBG App.)
7. Organizational Chart (Submitted with CSBG Application)
8. Program/Project Chart (Submitted with CSBG Application)
9. Approved Board Minutes
10. List of Satellite Offices
11. Equipment/Inventory Listing
12. Client Appeals Process
13. Financial Policies and Procedures

Item numbers 2, 5, 6, 7, and 8 are submitted each year with the agency's CSBG application. The liaison should make copies of those items for placement in the CONFAX. The Articles of Incorporation, list of Satellite offices and Client Appeals process probably won't change over the year. They should be submitted as updated or as requested.

By-Laws

The agency's By-Laws typically will not change regularly. It is important to review the By-Laws during the desk monitoring and compare them with the Board Roster to ensure the roster contains the proper number of Board members. If the agency does not reflect a full Board or a Board member is shown to be seated past their term limit, a clarification must be obtained. CAPs are encouraged to fill the vacancy as soon as possible, preferably within two months. Since there is no written policy regarding a time limit to fill vacancies, we can only encourage the CAPS to fill the seat(s) as quickly as possible.

The By-Laws state the number of Board members that shall be on the Board of Directors. One-Third of those members shall be Public officials, at least one-third shall be low-income representatives, and the remaining one-third shall be members of the Private Section. Requirement 113 of the Community Action Implementation Manual explains the sector break-out.

Board Documentation

The monitoring tool requires the review of two members from each sector. The By-Laws outline the number of seats on the Board. It is a good idea to review all Board files to confirm that all seats are filled in accordance with the By-Laws and all selection documentation is present in each file. The files are generally not that large and minimal documentation is required. Requirement 113 of the Community Action Implementation Manual explains Board Requirements. Approved Board minutes must be submitted after each Board meeting. Each agency is different so you may not receive one each month. Request a copy of the year's Board schedule at the beginning of the year to find out the scheduled meeting dates. The following items should be present in the Board Files:

Low-Income – Low-Income representatives must be selected through a democratic selection process. Appropriate documentation to confirm this selection process may include one or more of the following:

1. A request letter to a low-income entity requesting a Board member (required)
2. Notice of selection in a newspaper
3. Agenda from a public meeting
4. Sign-in sheets from an open meeting
5. Ballots from a selection
6. Board minutes documenting the selection

Private – A letter of request to a business/organization requesting a Board member and a letter from that organization nominating/selecting a member.

Public – A letter of request to a publicly elected official to become a member of the Board and a reply from the official accepting the offer and/or a letter designating a representative to fill the seat for the official.

If any of the above information is missing from the file (and is not a minor oversight), the missing item(s) will become problem/corrective action in the monitoring report and the agency will be required to submit them under a corrective action. One or two instances of missing items can be considered an oversight. Multiple instances may indicate a more serious systematic problem and should be considered a red flag.

The Board information is submitted each year with the agency's CSBG application.

Affirmative Action Plan

Requirements for the agency's Affirmative Action Plan are outlined in Requirement 103 of the Community Action Implementation Manual. The agency's Affirmative Action plan contains items that must be updated and Board approved yearly. The following are items reviewed during the monitoring process:

1. Date of current plan
2. Equal employment policy
3. Responsibility for implementation
4. Evaluation of previous goals
5. Establish new goals and timetables
6. Procedures for dissemination of the plan
7. Internal evaluation procedures

8. Grievance Procedures
9. Identification of the Equal Employment Opportunity Officer

If one or more of the items listed above are missing it becomes a problem/corrective action in the monitoring report. One suggestion to the agency may be to update this plan just prior to the submission of the agency's CSBG application and submit it with the application.

Personnel Policies and Procedures

Requirement 102 of the Community Action Implementation manual outlines the requirements for the Personnel Policies and Procedures Section of the monitoring tool. As with the other documents, these procedures are to be submitted annually or as revised. The items listed in the monitoring tool must be fully addressed. Many of the requirements are rather subjective in nature. ODOC may make suggestions to the executive director and Board but unless the CAA manual specifically states a policy the agency may make their own policy. The important part is that the agency HAS a policy and they govern by that policy.

One common instance is the relationship of the Board and the Executive Director. IM 82 explains this relationship. The board has one employee and that is the executive director. There must be some accountability by the executive director to the Board. ODOC does not specifically state what that accountability must say, but rather we want to see that there is indeed a policy in place. The main thing is that the Board is aware that any unlawful or unallowable action performed by the executive director is the responsibility of the Board.

Preparing for the monitoring

The Citizen Empowerment programs are monitored utilizing a specialized monitoring tool. This tool contains all the information that will be needed to verify program and financial information during the visit.

The cover sheet of the tool outlines all necessary documentation that will need to be obtained prior to the agency's visit. Prior to the monitoring visit, it is crucial to review the agency's prior year's monitoring report. The problems listed in the report will key the monitor in on what items will need to be reviewed outside of the monitoring tool.

Review the agency's program applications to familiarize yourself with their goals and objectives of the each program. It is helpful to keep notes while you are reading the applications. During the monitoring, visit with the program staff to ensure the goals are being met, purchases are in line with what was requested and in some cases the proper staff are being charged to the grant.

For those agency's that have Head Start, request a copy of the agency's most recent federal review. Review the report and note any findings. If findings are present, visit with staff regarding the corrective actions that will take or took place to correct the problem. Obtain copies of the follow-up correspondence that took place. If the problems are still unresolved, make sure that the agency submits follow-up correspondence. Were the problems noted significant? Did there seem to be a lot of problems? This report will help you gauge the strength of the program.

If at all possible, obtain a copy of the agency's audit prior to the visit. If you're unable to obtain the audit prior to the monitoring, make sure you request it once you arrive. Review the audit and look for findings or questioned costs that were noted. Review the audit and look at specific ODOC programs. Check to make sure that all ODOC programs are listed. What is the agency's cash balance? Was the audit completed in a timely manner? Basically, look for anything that seems excessively high or low. This is a good tool to use in discussions with the CFO regarding the financial status of the agency.

Each year community action agencies are required to submit 990 tax documents. ODOC staff can access these documents at www.guidestar.org utilizing the Advanced Search feature. Free sign-up to the Web site is required to obtain the information. Verify that these documents are being submitted and posted yearly. Keep in mind that a third party posts this information so there may be a time lag. If the most current information is not posted on the site, request those documents from the agency. This information will give you an idea of the financial health of the agency. If they can not produce the documents, this may be a financial red flag.

Some key things to review are:

1. Executive Staff pay
2. Current Officer Information
3. Program Expenses
4. Compensation of Highest Paid Staff Members
5. Land, Building, and Equipment Information

The financial section requires the monitor to print off information from OKGrants. This is where agencies submit applications, payments and expenditure reports.

This information is then attached to transaction forms. The first part of these forms is the checklist to make sure the contract's month-end general ledgers that are on file at the agency match the totals that are on file at ODOC. The second part is the location to document the specific information on the source documents that were reviewed.

Important things to bring to the agency during monitoring visits include:

1. Monitoring tool with pre-monitoring compilation
2. The CAA's Financial Binder and CONFAX binder
3. Copies of the CAA's grants (applications and closures)
4. Note pads, sticky notes, paper, paper clips and binder clips
5. Pens, highlighters, sticky flags, hand sanitizer
6. Calculator, ruler, rubber fingers, laptop
7. Documents that have been submitted to the liaison throughout the year. This will include things like agency newsletters, program information, copies of closeout docs with monthly reports, critical correspondence that may require further review

The Monitoring Visit

The entrance interview is conducted before any monitoring activities take place. It will typically include all management staff, program directors, and staff members that are deemed necessary. It is strongly suggested that a member of the Board, if at all possible attend (it is a requirement for the exit interview). During the entrance interview, the ODOC monitor will provide an outline of the monitoring activities. Immediate and known requests for information are given to agency staff. Dates/times for site visits to weatherization clients, Head Start Centers and Board member interviews are also scheduled at this time. As a courtesy, it is also beneficial to ask staff of pressing or urgent needs that may have arisen for them in order to work around. Generally the staff are all aware of the monitoring and will be available for you but unforeseen family events, sickness, or emergency meetings do arise. Typically at the entrance interview you will request:

1. Financial files for each contract being reviewed
2. A list of all agency employees by division (to keep). This also will provide the number of agency employees.

3. Weatherization files (the number of files you pull will be determined by the size of the agency) – include any specific files you would like to see.
4. Board files
5. Insurance Information
6. Agency bank accounts/name of bank
7. Copies of current leases (building or property)
8. Procurement procedures
9. Monitoring reports from other funding sources

The ODOC monitoring process can take up to two-weeks. It is important to note that the monitoring process should not be rushed. It is ODOC's responsibility to ensure that funds are being spent accordingly and that the agency is adhering to both our policies as well as their own. It should also be a time where ODOC is available to the agency staff to troubleshoot problems, discuss any pressing issues, or just provide needed technical assistance to staff.

During the monitoring visit you will be interacting with many staff members. Listen to what they have to say. More often than not, you will get a great deal of information about the agency management and program issues just through informal conversations. Do the staff members complain about things? What are the staff work habits like? Does there appear to be inadequate supervision? Is there evidence of micromanagement? How does the staff interact with each other? Note anything you see or hear that seems out of the ordinary. One or two comments may not mean much, but if comments are consistently being made or you observe many instances of an occurrence, this may indicate an overall bigger problem.

During the first week of the monitoring activities the financial and administrative review is conducted. This consists of review of the financial files, Board files, insurance documents, human resource files, and programmatic issues.

Financial Review

Because the financial review process is a multi-step process that typically includes numerous staff members, it is best to start here. Each financial file should include the month-end journal and a detailed journal log. Each contract's month-end journal should be reviewed first to ensure they match with ODOC. If the balances match, source documentation may then be selected for review. If they do not match, you will need to meet with the appropriate staff member to determine why.

Once it has been determined that the balances match, source documentation should be selected for review. The agency will provide you with their copies of the detailed ledger, but it is best to ask for a copy to keep with the ODOC records (it's best to request this at the entrance interview to give the agency sufficient time to print them). By doing so, ODOC will have records of all expenses charged to the contracts and can be written on.

Once the detailed ledger has been provided, review the line items carefully. It is important to look for the following items:

1. **Are the items charged to the correct line item?** For instance, are there charges to Wal-Mart listed under Salary? Do Utilities charges have an individual's name instead of a company name listed?
2. **Do the charges seem reasonable?** Is there a \$10,000 copier lease? Are there numerous charges to one company? Select anything that may appear questionable. Pay close attention to those business where unallowable items maybe also be purchased from (i.e. Wal-Mart).
3. **Pull high dollar purchases as well as smaller purchases.** By pulling higher dollar purchases you will have the opportunity to verify the agency is adhering to the purchasing requirements of the agency and ODOC. Were informal bids enough or was the formal bid process required? Did each item have

some sort of cost comparison conducted? Was the lowest bid selected? Are all bids available for review?

4. Are the charges listed consistent with what the agency has listed in the program application?

Compare notes taken during the pre-monitoring review with what was actually charged.

5. Are the charges allowable under the contract? For example, did the Weatherization program purchase food for the crew (not allowable)? Were administrative expenses incurred and charged to other lines items for programs that do not allow administrative costs?

6. Is the cost allocation plan being properly administered? Sit with the CFO or Financial Director and have them explain their cost allocation. Compare with the charges you are seeing. Are they consistent?

a. **Can the CFO explain the plan?** If not, this is a red flag. If they cannot explain the plan, how can use it properly?

7. Are required program/contract conditions being adhered to? This pertains to two things:

a. Program requirements - Programs like SAF/CAA require match funds be applied to the program. This is not included in a budgeted line item so it's important to verify that match is being expensed during the fiscal review.

b. Contract Special Conditions – Sometimes agencies have special conditions added to their contract. It is very important to review those conditions and make sure that the agency is or has fulfilled them.

Keep the above items in mind when reviewing the detailed information. If anything looks suspicious or out-of-line, choose it for review. Also, choose some vendors that the agency uses frequently (i.e. Wal-Mart, Lowes, Home Depot). More often than not, you will get a whole month's worth of purchases for numerous programs. Make sure the expense you've selected can be located in the stack of receipts. This also provides the opportunity to ensure the agency is utilizing their procurement process agency-wide.

Once the source documents have been selected for review, the agency staff will begin to pull them. Depending on how many documents have been selected, this could take some time. This is also a good time to review the agency's HR list that was requested at the entrance meeting. Select one or two employees from each department. Also, always pull the file for the Executive Director. The HR Director can pull these so they will be ready for review as soon as you are ready. Always have the HR director keep them in their office until you are ready as these files contain confidential employee information. While staff members are doing this, you can go on to another part of the monitoring such as reviewing Board files or insurance information. It keeps the down time to a minimum.

Once the source documentation has been given to you, you will need to review it to ensure it contains the appropriate information. It is important to be familiar with the agency's procurement policies. First, do they adhere to ODOC's purchasing guidelines? And second, do they adhere to the agency's policies?

Do the purchases contain:

1. Date of Purchase
2. Check Number and Amount
3. Payee/Vendor
4. Requisition or Purchase Order
5. Invoice or Statement
 - a. Keep in mind, if an invoice is present, there must also be receipts or an itemized invoice attached. Without the itemized document, there is no way to know what the purchase was for.
6. Copy of the check

Again, it is a good idea to be aware of the agency purchasing system. Some agencies allow blanket purchase orders for some vendors and some do not. If all information is not provided, question the financial staff as to why. If all information is not present the missing information becomes a problem in the monitoring report. Numerous missing items are a red flag that there could be significant financial and/or management issues.

Certain contracts have different rules and regulations. For instance, financial files may require additional source documentation on top of what is listed above. The Emergency Solutions Grant (ESG) provides funds for prevention activities. These activities also require the financial file to contain the client's application and an eviction notice/cut-off notice from the landlord or utility company. Many CAAs also require agency forms such as landlord/tenant agreements to be included in the files.

When reviewing the monthly detailed journals for CSBG, it is important to note if the employees being charged to the contract are listed in the agency's CSBG Budget Detail Page that is submitted with the initial application in OKGrants and also with each contract modification. Any employee salaries listed on the ledger but not in the support sheet may be required to be credited back and debited from another funding source.

After you have reviewed the source documents, you will be able to answer many of the questions outlined in the monitoring tool regarding financial compliance. This is also a good time to visit with agency fiscal staff about their procedures. The monitoring tool also includes a checklist that outlines which staff members are responsible for certain duties. Typically the agency will fill this out prior to the end of the financial review. This is a good time to go over this document with the staff. The tool will show if one person is performing duties that could put the agency at risk for fiscal mismanagement (i.e. theft or falsification of records). The tool should reveal the duties performed by a number of different staff members. This will help ensure that adequate internal controls are in place to avoid the mismanagement of funds.

Miscellaneous Financial/Administrative Questions

The above items will provide the required information in the monitoring tool. By this time, you've seen the general journals, source documentation, procurement and payroll areas of the agency. Based on the information found during this part of the monitoring, other questions to ask or documentation to ask for may include:

1. Balance Sheet – Can the agency provide you with a current one?
2. Aging of Accounts Payable – Can they produce this for you?
3. Credit Cards – Is the agency paying them off monthly? If not, where is the interest being charged to?
4. Line of Credit (outside of agency credit cards). Does the agency have a line of credit?
If so:
 - a. How much is it?
 - b. How long (months/years) is the payment on these lines?
 - c. How much interest was paid on them and where is it paid from?
5. How is the month closed out? Is there a deadline for receipts?
6. On average, how many journal entries are made each month? Is this the main method for moving funds around?
 - a. Obtain journal entry back-up for five journal entries.
7. Is cross-training conducted among employees?
8. Does the agency have an agency wide budget?
9. Are there numerous purchases at the end of contracts?
10. How is the agency tracking annual leave?
11. Is the agency current on their health insurance payments?

12. Obtain copies of the financial documents provided to the Board of Directors.
13. What is your current cash balance?

Once these items are all completed, this generally takes care of the fiscal portion of the monitoring. Through the required information on the monitoring tool and the above questions, a relatively clear picture of the agency's overall financial health can be obtained.

Human Resources

Because the financial staff are also involved in payroll activities, the Human Resource files should be reviewed next. Earlier in the monitoring you selected a sampling of HR files to review. These files should be reviewed to ensure compliance with both ODOC policies and agency policies. The agency's personnel policies and procedures have a list of items in which the agency requires in the files.

ODOC requirements for personnel files include:

1. The employee's resume or application
2. IRS W-4
3. Current job description
4. Personnel actions – these include raises, promotions, demotions, plans of improvement, etc.
5. Updated performance evaluations (make sure this adheres to the timeline listed in the agency's Personnel Policies and Procedures)

Any missing information will be listed as a problem in the monitoring report. It is always important to keep documents that contain confidential information in a secure location. Do not leave them sitting out for others to see. Return them immediately to the appropriate staff member when finished reviewing them. When the agency submits information for the corrective action, it is important that information such as the employee's social security information be removed. If a number of employee files are missing documentation this may be a red flag that there could be problems in the HR area.

Some other questions to be asked may include:

1. Are there any pending litigations?
2. What is the agency turnover rate?
3. What are the procedures for new hires?
4. How is the agency tracking annual leave?

Board of Directors

Prior to the monitoring, review IM82. This will help clarify many issues you may note during the monitoring.

The agency is required to keep a file on each Board member who is currently seated on their Board of Directors. Although the monitoring tool only requires that two board files be reviewed for each sector, the files are not that big and can all be reviewed in a reasonable amount of time. The sectors each have different selection documentation requirements so it's important to review the documents closely to ensure that the information in the files is consistent with the sector the member represents. For example, a low income sector member cannot have a letter of appointment since that does not allude to a democratic selection process.

The following items should be obtained and reviewed in order to ensure compliance with ODOC regulations:

1. A current Board Roster
2. A copy of the agency's By-Laws. The By-Laws should specifically outline:
 - a. Overall Term limits of members

- b. Three-Year Term
- c. Number of Board Members
- d. Seating and re/seating of members (particularly the public sector representatives.
- e. Specific agency seating procedures

Does the Board reflect compliance with the overall term limits, three-year term limit, and number of Board members listed in the By-Laws? Are the members seated and resealed in the manner listed in the agency's By-Laws? Some agencies do not require public sector representatives to be removed and resealed after the three-year term is completed. However, OCS/ODOC policies require all members, including public sector members, be removed and resealed after each three-year term has been completed. IM 82 provides clarification to many Board related items. If questions regarding the Board arise, it's a beneficial document to have with you during the monitoring visit.

The following information must be provided in each sector representative's file:

Low-Income Sector

At least 1/3 of the Board should represent the Low-Income and must be seated through a democratic selection process. Documents must be present that show this method was conducted. It does not necessarily have to be via an election, although many agencies have elections complete with ballots. Other documentation can include the agenda for a public meeting, Board meeting minutes or a public notice in a newspaper. There should also be a letter from the organization that is providing the Board Member stating that this member was chosen to be on the Board (again, make sure the documentation is provided showing the democratic selection process). Watch closely for the word appointment in any Board file that is for a low-income seat. Appointment does not allude to a democratic selection process.

Public Sector

One-third of the Board must represent the Public Sector. The public officials who fill these seats are:

1. Elected public officials that are a duly elected representative of a municipality, county, tribal government or State political subdivision. Typically most CAA's utilize their County Commissioners for this purpose. Other examples would be city mayors or their local legislators.
2. Employees of public agencies and members of boards and commissions established under State and/or local law who have responsibility and authority to determine and implement the policies of those agencies, boards or commissions. These are considered appointed officials.

An elected or appointed public official may designate another person to represent them on the Board. It is important to note that this person must have the authority to act on their behalf with regard to business of the Board (i.e. they can cast a vote for this official).

The files for these members must include a written request from the agency asking the official to be a member of their Board. There also must be correspondence from the official accepting the position.

Private Sector

The Private Sector will include the remainder of the Board members. This sector can have less than one-third only if the low-income sector has more than one-third.

The files for these members must include a written request from the agency asking the official to be a member of their Board. There also must be correspondence from the official accepting the position and/or designating a person to serve in their place.

It's also important to review the Board minutes to ensure the Board has voted to accept the new member(s).

The new board member can't just "show-up" as a new Board member without the Board voting to accept them as a new member. Some agencies automatically put a copy of the minutes in each member's file. The agency should be submitting these regularly throughout the year for the CONFAX. If not, this should be listed as a problem on the monitoring report.

Often times the agencies will have other required documents in the file. If this is an internal procedure, make sure they are following these procedures.

The By-Laws contain the rules for the Board of Directors. Be familiar with the By-Laws before reviewing the Board files to ensure the following:

1. The Board is fully seated with the correct number of Board members
2. The number of meetings outlined in the By-Laws have been held
3. That each members is within their term limits
4. Alternates are or are not permitted

Review the Board Roster and compare with the Board files to ensure the sector information for each member matches what is reflected on the Board Roster? If the agency allows alternates, review the process on how alternates are selected. Even though it is allowable, alternates on a Board can be detrimental. For those instances when an alternate steps-in in place of the member, they are often not well informed of the issues they could be voting on. In other instances alternates attend meetings in place of the actual member. Why is the member not coming? What are the policies that outline attendance for members? This should be outlined in the agency's By-Laws. Evaluate the usage of alternates and make an appropriate recommendation based on the information provided.

If the Board Roster has been modified to add/delete new members over the course of the year and has not been submitted to ODOC, this is a violation of the CONFAX requirements that state "All CONFAX items should be updated at least annually or as revised."

Board Member Interviews

During the monitoring visit, typically during the first week, Board Member interviews are conducted with one member from each sector. It is a good idea to give the Executive Director as much advanced notice as possible to schedule these meetings. These meetings can be requested with letter scheduling the interview followed up by a reminder email just prior to the monitoring or scheduling can also be done during the entrance interview. It's always best to be as flexible as possible when you're scheduling these meetings. Some Board members can only come during their lunch hour or after work. In some cases, if trips are already scheduled to outreach offices in other counties, meetings can be scheduled at those offices later in the week or even the second week. This is especially helpful for those members who live three or four (or more) counties away from the main office. If possible, have the ED schedule meetings with a Board member who is very new and one that has been on the Board for some time. Based on the answers you get, this will help you provide recommendation new member training.

The monitoring tool has a list of questions that are asked to each Board member. It is important to ask the same questions to all Board members. The Board is a major component of community action and if they are not aware of their responsibilities, how can they do their job? Does the Board as a whole need training, or just new members?

The staff must present all information to the Board in a clear, concise manner. During the monitoring, obtain a Board packet that is sent to the Board prior to the meetings. What is in it? What is given at the meetings? Is the information understandable? The Board needs all possible information to make the best decisions they can. If the information is not understandable, they are in danger of making

decisions based on incomplete or inaccurate views. If the packets and handouts are not adequate, a recommendation to the executive director may be to re-evaluate the information to the Board. If necessary provide TA to the agency staff as to what could be done different or what you see as inadequate. You will get a feeling of the Board's strength during the interviews.

Board/Executive Director Oversight

IM 82 from the Office of Community Services states that the Board has only one employee, and that is the executive director. What is the relationship between the Board and the ED? Who runs the show? Is the executive director accountable to the Board? The ED should adhere to the same rules as the agency staff. Is evidence of this present? Many of these items will be noted when the Executive Director's file is reviewed. Is a Board member signing the ED's leave and time sheets? Is the ED accountable for their travel? What is the approval process for ED travel? The Board must have a policy in place that outlines the oversight between the Board and ED. If unallowable charges are incurred by the ED, the Board is responsible for those unallowable charges.

CAPTAIN (or equivalent) Review

CAPTAIN is ODOC's online data management system that the agencies use to report their service data. It is important to review the agency's information throughout the year, not just during the monitoring. Using the CAPTAIN (or equivalent) Client Characteristics Report, you can obtain monthly service totals from the agency. By comparing data from month to month, you will easily be able to see discrepancies in data. For instance, if an agency has 600 clients served in June and only 200 in July, this is a red flag that problems are present. By keeping abreast of the totals, you can stay in contact with agency staff and ensure the data is relatively consistent each month and correct these discrepancies immediately. This will help alleviate any major problems when the agencies begin to prepare their data for the Information Survey conducted at the end of the year.

When reviewing the entire CAPTAIN (or equivalent) process and numbers, pay close attention to the following:

1. Is the agency constantly requesting and deleting new users? This could be an indicator that they may have issues with their data. New staff members are not well versed in reporting from day-one. This could result in flawed or incorrectly reported data?
2. Is there a CAPTAIN (or equivalent) administrator that reviews the data each month.
3. Does the CAPTAIN (or equivalent) Administrator share the data with the appropriate program directors?
4. How often do you hear from the agency's CAPTAIN (or equivalent) staff? Are they constantly calling with the same problem(s) or do you never hear from them? Either one could be a reason for worry.
5. Who enters data at the agency? Is there close contact between the data entry staff or are they just left alone to do their job without assistance?
6. Does agency staff participate in ODOC trainings and the training and technical assistance offered by CAPSystems ?

Head Start

Community Action Agencies receive State Appropriated Funds from the Department of Commerce for their Head Start programs. These funds are used to expand or enhance the services currently being provided to the children. A programmatic review (and site visits which are addressed later on) are used to verify compliance with the agency's application.

It is important to review the agencies application prior to the monitoring review. If the agency's application outlines staff salaries for expansion or enhancement, payroll records and time sheets can be reviewed for compliance. In some cases the agency may plan for staff salaries for extended services

during the day. In this instance, you will review the payroll records/time sheets followed by a site visit to the center in which the extended services were planned for.

If an agency is utilizing funds for something such as curriculum materials, you may review the purchase information during the financial portion followed by a verification of the actual materials at the center.

It is important to closely review the detailed expense logs during the financial review. If an agency only outlines salary in their application you should expect to only see payroll information on the ledger either by journal entry or by staff name. If other expenses such as supplies, materials or equipment charges are listed, this is a red flag that the agency may not be adhering to their grant. It could be simply a mischarged expense but it may also show mismanagement on the programmatic or financial end that must be addressed.

Each Head Start program has a review of the program that is conducted by HHS. This review addresses every aspect of the Head Start program and lists if any specific areas are out of compliance. It is important to obtain a copy of this and review it closely. Are there numerous compliance issues? What are they? It can be an important tool to get an idea of the programs strengths and weaknesses. Because it is conducted every three years, the tool can provide a starting guide of things that should be discussed on the off-years with Head Start staff.

Head Start Site Visit

During the monitoring visit, site visits are conducted at a few of the Head Start Centers. Typically, site visits are conducted during the second week. It is important to review the agency's application prior to going to the centers. If specific purchases were outlined in their application it is important to verify these while at the centers. Also, if the application outlines extended or additional services at a particular center, this can be verified during site visits. Another aspect of the site visit is to ensure the centers are clean, safe and well maintained. It is a good idea to conduct the site visits with the agency's program director. They know the policies of the centers, locations of many of the items you check and also the challenges the agencies may face. Head Start centers can be located in a variety of locations from schools, churches or stand-alone buildings. Even though each has their own challenges, it is important to note that all centers must comply with both ODOCA and HHS guidelines.

ODOC's site review is typically a modified Health and Safety checklist. However, if you see other potential problems (such as unaccompanied children in hallways or unsanitary kitchen areas) it is important to note those as well.

Typically we look at things such as:

1. Fire extinguishers
 - a. Where are they and when were they check?
 - b. How often are fire alarms tested?
2. Exit signs – Are they present at each door?
3. Tooth brushes – Are they stored in a manner that there is air flow and also that they do not touch other toothbrushes or a surface (this avoids bacterial growth)
4. Classroom Set-up
 - a. Are toys stored in an orderly fashion or just heaped in piles?
 - b. Are the classrooms outlined in sections such as a computer area, a library area, sand box area, music area?
 - c. Are the toys, furniture and other classroom materials in good condition?
 - d. Look for things like splinters on desks, peeling paint off of bookshelves or tables, holes in the carpeting, etc.
 - e. Are cleaning materials locked up?
 - f. Are things like knives and scissors out of reach or in locked cabinets?
5. Electrical Plug-ins – Are they all capped?
6. Bathrooms

- a. Are they clean?
 - b. Do the stools work?
 - c. Is the trash picked up?
 - d. Are the vanity cabinet doors locked?
7. Child Prescriptions/Medicines
- a. Are they kept locked in cabinets?
 - b. What are the policies for administration?
 - c. Are they labeled with the child's information?
8. First Aid Kit
- a. Where is it located?
 - b. Are the contents within the expiration time?
 - c. Is there a monthly checklist (these must be checked/inventoried monthly)
 - d. Can it be found easily?
9. Playground
- a. Is it gated?
 - b. Are the gates secured?
 - c. Are there gaps in the gate where children could wander through?
 - d. Are the toys in good condition?
 - e. Is it picked up?

As mentioned earlier, this is the agency's time with their liaison. Don't rush through the site visits. These site visits show our funds in action. Make sure that they are doing what they are intended to do.

Weatherization Client Files

Depending on the size of the agency, you will want to select approximately 10-12 weatherization files for each contract from the Weatherization Director. The monitoring tool has a Client File Review Check Sheet that will be utilized to ensure all required data is present. If any items listed on the checklist are missing, that will be listed as a problem in the monitoring report.

What to look for in the Weatherization files:

1. Is the agency utilizing the correct forms? All ODOC weatherization forms were updated in 2014. The old forms should no longer be used.
2. Is the client information listed on all forms? Often agencies will fill out the client's information on only one form in the file. All forms must have the client data on filled-out. This will ensure the forms can be returned to the proper file if they are removed.
3. Look at the final inspection check list and QCI documents. Did the agency just draw lines down each column or did they take the time to check each item. By checking each item there is a better chance that the agency completed a comprehensive review.
4. Each weatherization program has a few different rules for certain things. A few of these are:
 - a. Weatherization funds can be utilized for rental homes. If it is rental unit, a rental agreement form must be included in the clients file.
 - b. If DHS funds are being utilized, they must have a LIHEAP number (unless they are self-certified).
 - c. Verify the work completed with the purchases made. If they purchased three doors and six windows for a home, you should be able to review three doors and six windows actually installed on the home. You will not be able to count every screw and tube of caulk, but you should be able to see caulk around windows and doors. The weatherization director will show you the work that has been completed.
 - d. Make sure all parts of the client's application are completed. One problem commonly seen is that the agency does not sign the form stating that the client's income has been verified. The client's income information must be part of the file. Just because it is there does not ensure the client's income qualifies.

- e. Each contract has different start dates. Make sure the work completed is within the contract dates.
- f. Review the MMBtu and MMBtu dollar savings on the BWR. Does it look high or low? If you see a home with a MMBtu savings of 100 and a MMBtu \$\$ savings of \$50,000 that is a very strong indicator that their NEAT/MHEA software has issues or the data is not being entered correctly.

Things to look for in the Weatherization Program

The weatherization program is provided funding that is broken down by county. They also have a management plan broken down by county. Review the home totals that have been weatherized in each county to ensure the management plan is being complied with. This should also be closely watched each month when they submit their narratives. Other items to review include:

1. Does the agency have a waiting list? This is generally a good indicator if they need to market the program. If the agency has a waiting list of only a few homes or none at all, they need to start marketing the program.
2. What is the agency's average cost per house (ACPU)? A low cost per house indicates that the agency is probably not doing much work to the homes they are weatherizing. Another possibility is that they only choose homes that do not require more work because the crew members have not been properly trained. You will need to discuss this with the WX Director to determine the cause. If the ACPU is higher than the allowable limit, the agency is also out of compliance. It is allowable to go over the maximum amount on some homes and less on others. The main objective is to come as close to the allowable ACPU as possible.
3. Has the agency received proper training? Do they go to Association and ODOC sponsored training activities?
4. Is the agency able to properly manage their production schedule to ensure that they are not completing the majority of their houses at the end of the contract?
5. Does the Weatherization program work closely with other service providers in their communities such as DHS to obtain LIHEAP eligibility, the Senior Centers, the Head Start Programs? All of these programs serve low income clients.

Weatherization Site Visits

Part of the monitoring visit is to conduct site visits to client homes under the Weatherization program. Typically the site visits are conducted during the second week. Site visits are usually coordinated during the entrance interview.

Weatherization site visits are used to review work on a home, evaluate the quality of the work, verify the purchases, and to ensure the agency is complying with weatherization policies and procedures.

When selecting homes to evaluate during site visits, you will need to rely quite heavily on the agency staff to help coordinate homes for review. Ask them to pick homes where they have achieved the most energy savings and one that posed the biggest challenge. The WX staff know their clients and when and/if they will be available and they know their counties and will be able to select homes that are all in certain areas. This will avoid excessive driving and save both time and fuel. However, if you notice questionable weatherization purchases or practices, a questionable BWR or final checklist, do not be afraid to request a visit to that home. If you have been working with an agency that has had issues with a particular home during the contract, it is a good idea to conduct a site visit to the client's home and review the work done and verify the issues have been resolved.

When arriving at the client's home the first thing that should be done is greeting the client. The connotation of State officials, to some, can be scary so by making a friendly initial contact, the client will be more at ease. It's important that they know we are evaluating the agency's work and not them. If possible, ask the client to show you what has been done to their home and if the weatherization has

made a difference. Was the crew friendly and courteous? Did they clean up afterwards? These are all questions that will help gauge the work and crew's capabilities.

Look at all possible measures that have been done to the house. If insulation was blown in the attic, make sure a tag is left in the attic stating the date, number of bags blown and the R-Value. If the attic hatch is obscured by belongings, hard-to-move furniture or clutter, it's best to let that go. Were windows and doors installed? Was the trim outside painted/sealed (it should be)? Look both inside and outside the home. Look at the condition of the home. Is it close to being condemned? Is there trash and debris in and around the home that should have rendered the house not worthy for weatherization at the time? If so, what is the agency's walk-away policy? Crew safety also has to be taken into effect. Chances are, if the crew members are not going to be safe, the home owner is not either.

It's important to look at the home as if it was yours. Without going overboard, was the home made to look as good as possible? For example, did they replace a section of ceiling in the middle of the living room? Did they paint it? A simple coat of paint will make things look nicer. Was the trim replaced on a white home and painted with purple paint? You wouldn't want that on your home, so it shouldn't be done on someone else's home.

Always make sure to let the owner know you are done. If you find anything that needs to be fixed, be sure to let them know what it is and why. In most cases the Weatherization Director will schedule the work within a few days. Depending on the severity of the problems, digital photos of the corrective actions can be accepted. If there are numerous problems with the work, this is a good indication that training needs to be scheduled with the crew.

What to look for will come with both time and training. The best thing is to use common sense and if you're not sure about something, write down any questions and call back to the team for clarification.

Exit Interview

The exit interview is the venue where all problems, concerns and praise (make sure the good things are discussed, too!) are discussed. All program and management staff are required to attend as well as a Board Member. It is always a good idea to maintain a good line of communication with the agency throughout the monitoring. If you find something that appears to be out-of-compliance or may be an issue, discuss it with the appropriate staff member. Many times the problem can be explained or other documentation can be acquired to clear up any issues. However, you may also find some concerns or questions that will require clarification by staff at ODOC. If you are unsure of something, try and get clarification from ODOC staff prior to discussing it with agency staff. If you are unable to get clarification prior to the exit interview, explain to the staff that you have questions regarding Program A or B that you want to get clarification on before listing it as a problem. In general, there should be nothing in the report that wasn't addressed with staff at the exit interview.

Monitoring Wrap-Up

Once the monitoring has been completed, the final portion of the monitoring tool can be completed. The information you obtained at the agency over the course of the monitoring will now tie in with the information that was listed at the beginning in the seven agency status areas.

The Agency Status Scales at the end of the monitoring tool are the method in which the agency's health is determined. Each area is broken-up into a rating and given a numeric value. Determine what area fits your observations. These values are then averaged and the final status is determined.

It is important to note that an agency can have an almost perfect rating of 4.2 and still have an area that is in-crisis. Generally this does not happen; however, it could be a sign that a good agency is going bad. If the rating for everything but ROMA is a 4 or 5, you will need to work with the agency on

strengthening ROMA in the agency. If you arrive at a 2 or 3 average, it is a sign that the agency is having issues agency wide and may require closer observation. Anything in the 1 or 2 areas will require extensive technical assistance and ODOC intervention.

Through your discussions and document review, you will have already obtained a list of problems, concerns recommendations and questioned costs. When writing the review, any item that was incorrect, had missing information, etc., is listed as a problem. Each problem has a corrective action. You may find it necessary to address issues in ways other than a problem. Questioned costs should outline the costs in questions and what you would like from the agency to clarify the costs. Concerns should outline the concerns you observed during your visit. Unless you specify an action, problems and questioned costs are generally the only thing the agency must respond to. Concerns are not yet a problem and recommendations are just that – a recommendation. The agency can choose to act on it or not.

It is important to document concerns and recommendations. These arise for a reason and over time, they can turn into problems. By raising these concerns in a formal report, the concern has been documented and should be revisited in future monitoring visits.

Per the CET policy, the official monitoring report must be issued within 30 days from the exit interview. The reports are addressed to the Executive Director and copies are generally sent to the Board President. All corrective actions must be at least addressed with a correction action or a timeline for a corrective action within 30 days of the receipt of the report. Once all corrective actions have been accepted and other information has been submitted and approved, the monitoring can be closed. This letter is also addressed to the Executive Director and states that all corrective actions have been accepted and the monitoring has been closed. Normally a copy of this letter also goes to the Board president.

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? **[Insert a number from 1 – 100]**

Note: This item is associated with State Accountability Measure 4Sa(ii) and may pre-populate the State’s annual report form.

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

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

10.4a. If no, describe State procedures for addressing eligible entity findings/deficiencies, and the documenting of closure of findings. **[Narrative, 2500 characters]**

10.5. Quality Improvement Plans (QIPs): How many eligible entities are currently on Quality Improvement Plans? **[Numeric, 3 digits]** **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? **[Narrative, 2500 characters]**

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

Within 30 calendar days of its approval of a QIP the State will notify its Office of Community Services assigned Program Specialist by email.

- 10.7. Assurance on Funding Reduction or Termination:** Does the State assure, according to Section 676(b)(8), that “any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b).” 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.** Does the State CSBG statute and/or regulations provide for the designation of new eligible entities? Yes No
- 10.8a.** If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for the designation of new eligible entities. **[Narrative, 2500 Characters]**
- 10.9.** Does the State CSBG statute and/or regulations provide for de-designation of eligible entities? Yes No
- 10.9a.** If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for de-designation of new eligible entities. **[Narrative, 2500 Characters]**

§74-5036. Community action agency defined - Evaluation of service areas and agencies.

A community action agency shall be defined as a public or private nonprofit agency, designated by the Oklahoma Department of Commerce.

The Oklahoma Department of Commerce shall have the right to evaluate existing service areas and community action agencies and, as may be necessary, modify boundaries of the service areas or rescind designation in accordance with the provisions outlined in Section 45 of this act so that services will be adequately and efficiently provided.

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

10.10a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for re-designation of existing eligible entities. **[Narrative, 2500 Characters]**

§74-5039. Rescission of designation of community action agency.

A. Prior to rescission of designation of a community action agency, the Oklahoma Department of Commerce shall:

1. Determine whether the existing or proposed community action agency is in compliance with Sections 41, 42 and 43 of this act;

2. Evaluate the existing or proposed community action agency service area, and, as may be necessary, modify the boundaries of the service area so that services will be adequately and efficiently provided;

3. Provide a written notice containing the reasons for the anticipated action to the chairman of the board of the existing or proposed community action agency.

B. The Oklahoma Department of Commerce may rescind the designation of a community action agency if it is found that the community action agency is not in compliance with any or all of the provisions of Sections 41, 42 and 43 of this act.

Any agency whose designation is rescinded pursuant to this section may appeal the order of rescission in accordance with existing state and federal law. The Oklahoma Department of Commerce shall consider a community action agency or agencies for the assumption of all or a portion of the service area of a community action agency with contiguous borders whose designation may be rescinded.

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). **[Narrative, 2500 Characters or attach a document]**

The State uses an accounting system that allows for tracking of federal funds by program year in addition to a grant management system that tracks the draws and expenditure information for sub-recipients of federal funds. The systems provide reports by program year as well as account codes such as salary & fringe, supplies, etc. both at the state and sub-recipient levels. The accounting records are regularly reconciled back to the federal draw system. Expenditures are reviewed and approved by program staff prior to submission to the accounting department. Financial staff also review to ensure the expenses were incurred during the grant's period of performance and are in compliance with OMB grant guidance.

10.12. Single Audit Management Decisions: Describe State procedures for issuing management decisions for eligible entity single audits, as required by Block Grant regulations applicable to CSBG at 45 CFR 75.521. If these procedures are described in the State monitoring protocols attached under item 10.2, indicate the page number. **[Narrative, 2500 Characters]**

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

An Audit Report Checklist is completed and verified by the audit staff. An Audit Review form containing the decision is uploaded into the State CSBG office's online grants management system. The contractor receives an email notification if an audit response is required and when the audit is closed.

10.13. Assurance on Federal Investigations: Will the State "permit and cooperate with Federal investigations undertaken in accordance with Section 678D" of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act? Yes No

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

If this is the first year filling out the automated State Plan, skip the following question.

10.14. Performance Management Adjustment: How is the State adjusting 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 this State is not making any adjustments, provide further detail. **[Narrative, 2500 Characters]**

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

Not applicable – first year

SECTION 11 Eligible Entity Tripartite Board

11.1. Which of the following measures are taken to ensure that the State verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B of the CSBG Act? **[Check all that applies and narrative where applicable]**

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

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

- Annually
- Semiannually
- Quarterly
- Monthly
- Other **[Narrative, 2500 characters]**

Any changes to bylaws are to be reported when the change occurs.

11.3. Assurance on Eligible Entity Tripartite Board Representation: Describe how the State will carry out the assurance under Section 676(b)(10) of the CSBG Act that the State will require eligible entities to have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entities' Tripartite Board. **[Narrative, 2500 Characters]**

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

The state reviews the eligible entities policies and procedures. In addition board files are reviewed as part of the state's on-site monitoring visits. Documentation in the Board member files is reviewed to determine the process by which the members were elected to the board.

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

11.4a. If yes, describe the mechanism used by public eligible entities as an alternative to a Tripartite Board. **[Narrative, 2500 Characters]**

Section 12

Individual and Community Income Eligibility Requirements

12.1. Required Income Eligibility: What is the income eligibility threshold for services in the State? [Check one item below.]

- 125% of the HHS poverty line
- X % of the HHS poverty line (fill in the threshold): _____% [insert up to a 3 digit percentage]
- Varies by eligible entity

12.1a. Describe any State policy and/or procedures for income eligibility, such as treatment of income and family/household composition. [Narrative, 2500 Characters, or attachment]

The State requires that eligible entities have policies/procedures in place to assure compliance with income eligibility requirements for the programs they administer. As part of the state's on-site monitoring, the eligible entity's policies/procedures are reviewed to ensure that the agency is servicing low-income individuals. In addition, client files are reviewed for documentation of household numbers and income verification.

12.2. Income Eligibility for General/Short Term Services: For services with limited in-take procedures (where individual income verification is not possible or practical), how does the State ensure eligible entities generally verify income eligibility for services? An example of these services is emergency food assistance. [Narrative, 2500 Characters]

As a part of the onsite monitoring of eligible entities the state reviews income verification on a sampling of clients for both ODOC funded programs and non-ODOC funded programs and ensures the agencies have policies and procedures in place that are used to ensure low-income populations are served.

12.3. Community-targeted Services: For services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations), how does the State ensure eligible entities' services target and benefit low-income communities? [Narrative, 2500 Characters]

Each eligible entity is required to develop a Community Action Plan describing the community-wide approach the eligible entity will take when making decisions on the anti-poverty programs to be administered by the eligible entity. The Community Action Plan must include a description of the current service delivery system targeted to low-income individuals and families in the service area. Including services offered by the eligible entity and services

provided by other agencies. This plan is reviewed by a state monitor in conjunction with review and execution of the entity's annual funding award.

In addition, as a part of onsite monitoring of eligible entities the state reviews income verification on a sampling of clients, for both ODOC funded programs and non-ODOC funded programs and ensures the agencies have policies and procedures in place that are used to ensure low-income populations are served. Also, each program year eligible entities are required to complete and submit an agency program chart that ties the programs to the NPIs/ROMA outcomes.

SECTION 13

Results Oriented Management and Accountability (ROMA) System

13.1. ROMA Participation: In which performance measurement system will the State and all eligible entities participate, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act? **[Check one]**

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

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

13.1a. If ROMA was selected in item 13.1, attach and/or describe the State's written policies, procedures, or guidance documents on ROMA. **[Attachment and Narrative, 2500 characters]**

Attached is requirement #100 from our CAA Implementation Manual and a copy of the ROMA Implementation Plan that has been completed by each eligible entity.

SECTION I
REQUIREMENTS FOR ALL PROGRAMS
REQUIREMENT NO. 100
RESULTS ORIENTED MANAGEMENT AND ACCOUNTABILITY (ROMA)
EFFECTIVE SEPTEMBER 1, 2014

I. ROMA

- I. The ROMA framework must be implemented and strived for, by all contractors, for all programs, both ODOC and non ODOC funded. The framework consists of following six goals:
 1. Low-income people become more self-sufficient
 2. The conditions in which low-income people live are improved
 3. Low-income people own a stake in their community
 4. Partnerships among supporters and providers of service to low-income people are achieved
 5. Agencies increase their capacity to achieve results
 6. Low-income people, especially vulnerable populations, achieve their potential by strengthening family and other supportive systems.

- II. Contractors must implement a Results-Oriented Management system by
 - a. Having a clear anti-poverty mission, vision, and values statement
 - b. Conducting a Community Needs Assessment every two years to assess poverty needs and conditions within their community
 - c. Using the Community Needs Assessment to identify results to be achieved within their community
 - d. Executing programs based on the Community Needs Assessment
 - e. Implementing a system to track client services and analyzing customer satisfaction on an annual basis.
 - f. Develop a community action plan that is outcome based, anti-poverty focused and ties directly to the Community Needs Assessment
 - g. Each agency must ensure that all staff are trained by a certified ROMA trainer.

- III. Contractors must utilize a Results-Oriented Accountability by
 - a. Tracking and reporting client outcomes for all ODOC and non ODOC funded programs in an ongoing manner. Data should be entered by the 20th of each month for all programs and reviewed by agency management.
 - b. Developing strategies to evaluate improvements in the condition of low-income families.
 - c. Identifying clear links between indicators being measured and the six ROMA goals (NPIs).
 - d. Using the information gathered to inform a long-range strategic plan, funding, and community partnerships that includes an evaluation process to determine effectiveness of the strategic plan, agency advocacy and community partnerships.
 - e. Submitting the CSBG Information Survey Annually in timely, completely, and accurately manner

- IV. The ROMA process should be integrated throughout the agency and information shared with the agency's board of directors on a regular basis.

II. CONTRACTUAL REQUIREMENTS

Contractors are required to track and report client outcomes for all ODOC funded and all CSBG supported programs.

ROMA Implementation Plan – 2015 Calendar Year

Agency:

Date:

Section A. Initial Training Plan

The first step in ROMA implementation is ensuring that all staff has received the appropriate training. Please review the training options below, and then complete the attached sheet.

- **Intro to ROMA training** (8 hour presentation)
 - ALL leadership and management positions who are involved strategic planning will be required to receive this training. If there are any questions about this, contact your liaison.
 - ALL other key personnel responsible for ROMA implementation will also be required to receive this training
 - Presented by a National Certified ROMA Trainer or those working towards certification
 - Please contact your ODOC liaison for training needs
- **ROMA in a Nutshell** (approximately 10-15 minutes, self-paced)
 - ALL remaining staff, not receiving Intro to ROMA training, will be required to receive this training
 - Does not require a National Certified ROMA Trainer
 - This training is available in two formats – electronic or hard copy
 - Electronic training consists of
 - A PowerPoint (ROMA In A Nutshell w/PowerPoint Activity)
 - Hard copy training consists of
 - A printed copy of the PowerPoint (ROMA In A Nutshell w/Paper Activity)
 - One activity sheet (Outcomes vs. Outputs_BLANK)
 - One activity answer sheet (Outcomes vs. Outputs_ANSWERS)
- **ROMA Board Training** (approximately 20 minutes – self-paced 15 min video and handouts)
 - All board members will be required to receive training , can be done individually or as a board together
 - Does not require a National Certified ROMA Trainer
 - Board members should sign a statement saying they have received board training and it should be kept in their board files.
 - Training consists of
 - 15 min video (<http://www.thecaap.org/media/videos/#vid15>)
 - 9 Handouts
 - History of ROMA and Community Action
 - ROMA Cycle
 - Six National Goals
 - Family, Agency, Community Levels
 - Outcomes vs. Outputs_BLANK
 - Outcomes vs. Outputs_ANSWERS
 - Establishing Targets and Measuring Performance
 - ROMA Logic Model

Section B. Initial ROMA Implementation

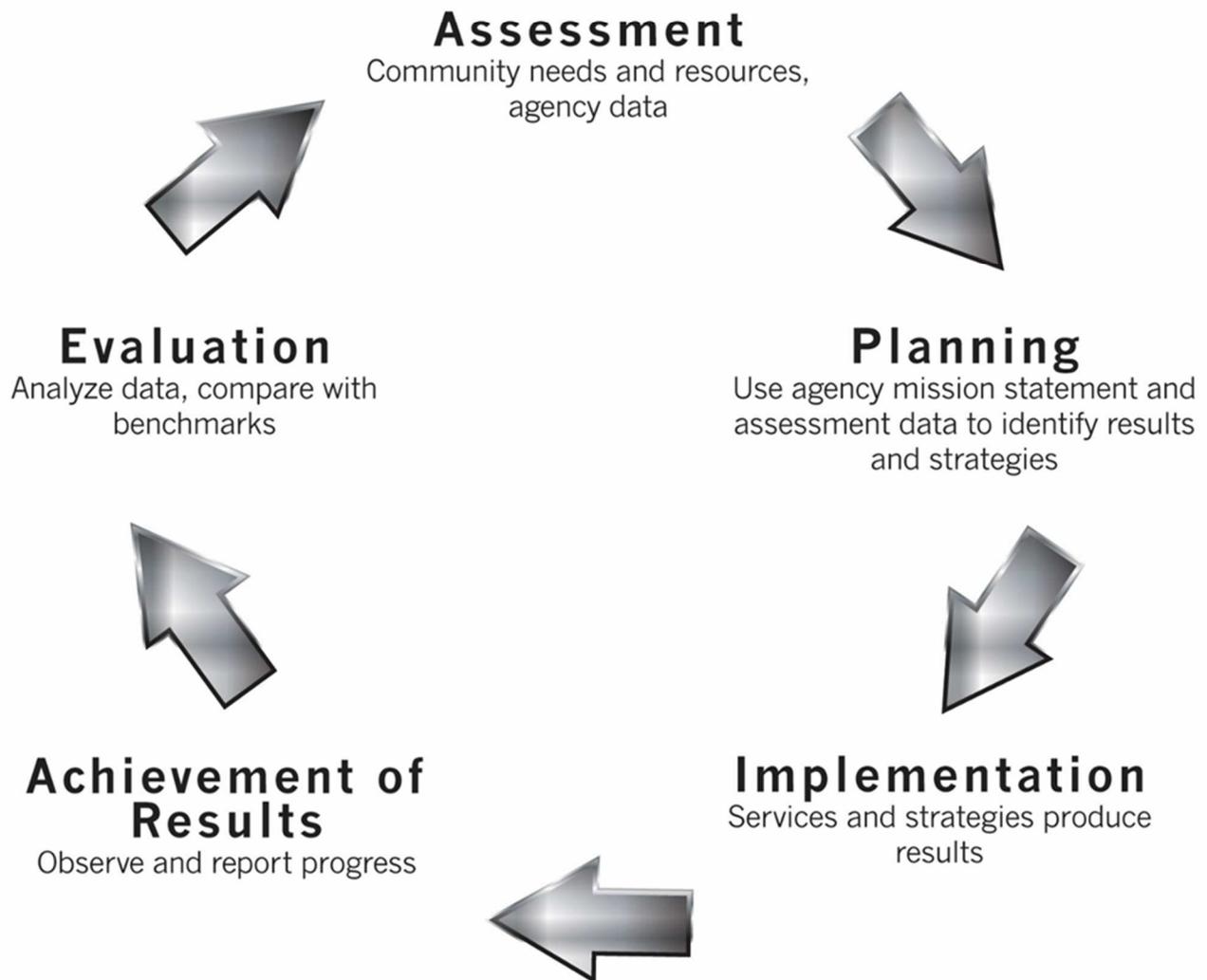
ROMA Cycle	ROMA Action Item	Participant Manual Module	Initial Target Completion Date	Person(s) Responsible
Assessment	Review/revise current MISSION statement	2, Part 1		
	Review last community NEEDS assessment to determine priority needs <ul style="list-style-type: none"> Ensure that needs identified are properly labeled as <i>family, agency, and community levels</i> 	2, Part 2		
	Evaluate the available resources in your community to address any service gaps or find collaborators	2, Part 2		
	Evaluate current program services and determine effectiveness to meet needs (based on recent program performance).	2, Part 2		
Planning	For the top 3-5 needs identified in your most recent community needs assessment, begin to develop a logic model for each. Fill in as you complete the ROMA action items.	7		
	Based on needs and program evaluation, identified during the assessment process, plan your measurable OUTCOMES to be achieved to meet the needs that are linked to the 6 NPI's.	3, Part 1		
	Identify SERVICES and strategies to achieve outcome(s).	3, Part 2		
	Determine OUTCOME INDICATORS	4		
	Determine your projected success rates for each outcome indicator.	5		
	Develop a system to track services and outcomes. Determine what documentation will be collected to measure each outcome, staff responsible and how often data will be collected. (MEASUREMENT, DATA, and FREQUENCY)	5		
	Update Community Action Plan to include outcomes, strategies and specific data collection information.	3, Part 1		
Implementation	Implement revised Community Action Plan	4		
	Determine frequency to monitor implementation of plan.	4		
	Determine the frequency for evaluating progress and report results to board.	4		
Achievement of Results	Measure your actual RESULTS for each outcome	5		
	Analyze data; compare with performance targets/projected success rates determined during the planning phase.	5	December 2015 - January 2016	
	Adjust performance goals as needed as evidenced by actual performance. Continue strategies that achieve desired performance goals. Revise or discontinue strategies that do not achieve desired performance.	5	January 2016	
	Update Community Action Plan.	4	January 2016	
	Submit CSBG IS report.		January or February 2016	

Evaluation	Reevaluate the community needs assessment process make changes (if needed) to ensure that later assessments follow the ROMA framework and guidelines	2, Part 2		
	Review the demographics of the population served. Identify if they have received single services, multiple services, or bundled services. Consider the connections among people, services, and outcomes.			

****Remember that the ROMA cycle is a on-going cyclical process.****

This form is just to help you take the first steps in implementing ROMA within your agency.

The Results Oriented Management and Accountability Cycle



ROMA Cycle was created by the National Peer-to-Peer ROMA Training and Certification Project

13.1b. If ROMA was not selected in item 13.1, describe the system the State will use for performance measurement. **[Narrative, 2500 characters]**

13.2. Indicate and describe the outcome measures the State will use to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization, as required under Section 676(b)(12) of the CSBG Act? **[Check one and Narrative, 2500 characters]**

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

CSBG National Performance Indicators (NPIs)

NPIs and others

Others

13.3. How does the State support the eligible entities in using the ROMA system (or alternative performance measurement system)? **[Narrative, 2500 characters or attach a document]**

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.

The state has 4 Nationally Certified ROMA Trainers (NCRT), 2 of which are in the State CSBG office, that provide on-going training & technical assistance to the eligible entities. The state plans to provide training as detailed in our State Training and Technical Assistance plan found in Section 8 and the State CSBG office NCRTs also offer ROMA training twice per year at State Association conferences. In addition, the state offers an on-line data collection system (software user fees and on-going technical assistance provided by the software company). The system (CAPTAIN) currently tracks outcomes by NPI and also has the capability to track outcomes on scales and matrices. The state currently plans to implement the use of scales and matrices in 2017, after the eligible entities have fully implemented ROMA throughout the 2016 calendar year

13.4. Eligible Entity Use of Data: How is the State validating that the eligible entities are using data to improve service delivery? **[Narrative, 2500 characters or attach a document]**

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

The state provides funds to eligible entities for user fees for an online data collection system. The system currently tracks outcomes by NPI. The full capacity of the system will be utilized at a later date to track outcomes with scales and matrices. Eligible entities currently use the system to report outcomes and demographics for the individuals and families they serve throughout the year. The system is used by the eligible entities to review progress with CSBG goals and to complete their annual IS reports. The state reviews the system periodically to ensure data is being entered by eligible entities and in addition reviews the eligible entities use of the data during the on-site monitoring visit.

Community Action Plans and Needs Assessments

13.5. Describe how the State will secure a Community Action Plan from each eligible entity, as a condition of receipt of CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act. **[Narrative, 2500 characters or attach a document]**

Note: this response will link to the corresponding assurance, item 14.11.

The state requires that eligible entities submit their annual Community Action Plan with their CSBG grant application each year. The plan is reviewed by a state monitor in conjunction with review and execution of the entity's annual funding award.

13.6. State Assurance: Describe how the State will assure that each eligible entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity's Community Action Plan, as required by Section 676(b)(11) of the CSBG Act. **[Narrative, 2500 characters or attach a document]**

Note: this response will link to the corresponding assurance, item 14.11.

Currently, the state requires that eligible entities submit a summary of their Community Needs Assessment every other year with their CSBG grant application. The summary is reviewed by a state monitor in conjunction with review and execution of the entity's funding award.

For the 2016 funding cycle, the state plans to change its policy for completion of a needs assessment from once every two years to once every three years. The process will still require eligible entities to submit the assessment with their CSBG application.

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;

[Narrative, 2500 or attach a document]

Each eligible entity is required to develop a Community Action Plan describing the community-wide approach the eligible entity will take when making decisions on the anti-poverty programs to be administered by the eligible entity. The Community Action Plan must include a description of the current service delivery system targeted to low-income individuals and families in the service area

including services offered by the agency and services provided by other agencies. This plan is reviewed by a state monitor in conjunction with review and execution of the entity's annual funding award.

In addition, as a part of onsite monitoring of eligible entities the state reviews income verification on a sampling of clients, for both ODOC funded programs and non-ODOC funded programs and ensures the eligible entity has policies and procedures in place that are used to ensure low-income populations are served. Also each program year eligible entities are required to complete and submit an agency program chart that ties the programs to the NPIs/ROMA outcomes.

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;

[Narrative, 2500 characters OR attach a document]

Each eligible entity is required to develop a Community Action Plan describing the community-wide approach the contractor will take when making decisions on the anti-poverty programs to be administered by the agency. The Community Action Plan must include a detailed description of how the agency does or will address the needs of youth in low-income communities through youth development programs. This plan is reviewed by a state monitor in conjunction with review and execution of the entity's annual funding award.

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)

[Narrative, 2500 characters OR attach a document]

Each eligible entity is required to develop a Community Action Plan describing the community-wide approach the eligible entity will take when making decisions on the anti-poverty programs to be administered by the eligible entity. The Community Action Plan must include a description of the current service delivery system targeted to low-income individuals and families in the service area. Including services offered by the entity and services provided by other agencies, a description of how the agency has coordinated and/or partnered with other local agencies to address gaps in services, and a description of how CSBG funds will be coordinated with other public and private resources. This plan is reviewed by a state monitor in conjunction with review and execution of the entity's annual funding award.

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;

[Narrative, 2500 characters OR attach a document]

Oklahoma has 19 eligible entities that serve all of its seventy-seven counties.

The service delivery system for the eligible entities involves two initiatives. First, the entities establish partnerships with all other agencies that can assist clients with access to services that are related to the agency's identified priorities. These relationships provide a network of services and referral sources that will assist individuals and families to secure greater self-sufficiency. The second initiative involves a system of intake, assessment and eligibility for services offered by the agency. A uniform intake is completed for each client coming to the agency for services. If the intake indicates that

additional services offered by the agency or by other partners would enable the client to secure services that promote self-sufficiency, the client is referred to other programs or other agencies.

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).

[Narrative, 2500 characters OR attach a document]

Eligible entities support many programs and initiatives with CSBG funds that strengthen families and encourage parenting. One eligible entity puts on a Fatherhood Fish-a-Thon which is a two week experience in which fathers or father figures for each child attend the event to fish with their child. Other fatherhood initiatives include Donuts with Dads and Dad’s Moments where dads have activities with children such as painting race cars and racing them.

The HOME Program, where eligible entities buy and renovate homes and then rent them to low-income people. Safe, low-cost housing has been shown to strengthen the family as a whole.

Some other family support initiatives are Family Advancement Services which provides parenting classes, screening for public benefits and financial coaching; family literacy efforts that include an adult education program, ESL programs as well as weekly story time events which help teach parents literacy skills, build home libraries, and promote intergenerational literacy.

Also, there are community outreach efforts and social events at agency-owned apartment complexes (planned by the resident association groups) including holiday parties, community picnics and health fairs.

And of courses, the Head Start program places a heavy emphasis on parent involvement in the classroom.

Eligible entities provide a description of how funds will support innovative community and neighborhood-based programs such as fatherhood initiatives, and other initiatives aimed at strengthening families in their annual Community Action Plan and needs assessment summary that is submitted with their annual funding application.

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.”

[Narrative, 2500 characters OR attach a document]

Each eligible entities is required to develop a Community Action Plan describing the community-wide approach the contractor will take when making decisions on the anti-poverty programs to be administered by the agency. The Community Action Plan must include a detailed description of the strategy to counteract conditions of starvation and malnutrition and include a description of the agency’s emergency food provisions plan- qualifications, limitations, evaluations, and coordination with other programs. This plan is reviewed by a state monitor in conjunction with review and execution of the entity’s annual funding award.

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

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

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

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

State Coordination/Linkages and Low-income Home Energy Assistance

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

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

[No response; links to 9.2 and 9.5]

Federal Investigations

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

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

[No response; links to 10.13]

Funding Reduction or Termination

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

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

[No response; links to 10.7]

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

- 14.9. 676(b)(9)** Describe how the State will assure “that the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the

communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations.”

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

[No response; links to 9.6]

Eligible Entity Tripartite Board Representation

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

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

[No response; links to item 11.3]

Eligible Entity Community Action Plans and Community Needs Assessments

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

[No response; links to items 13.5 and 13.6]

State and Eligible Entity Performance Measurement: ROMA or Alternate system

14.12. 676(b)(12) Provide “an assurance that the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to section 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and [describe] outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization.”

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

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

Validation for CSBG Eligible Entity Programmatic Narrative Sections

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

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

[No response for this item]

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

DRAFT

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]**

900 N. Stiles Ave., Oklahoma City, OK 73104

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

Alternate II. (Grantees Who Are Individuals)

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

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

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

15.3 Debarment

CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS

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

Primary Covered Transactions

Instructions for Certification

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

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

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

Primary Covered Transactions

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

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

(d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.

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

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

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
- (2) The certification in this clause is a material representation of fact upon which reliance was
- (3) placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
- (4) The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.
- (5) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.
- (6) The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.
- (7) The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

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

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

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

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

15.4 Environmental Tobacco Smoke

Public Law 103227, Part C Environmental Tobacco Smoke, also known as the Pro Children Act of 1994, requires that smoking not be permitted in any portion of any indoor routinely owned or leased or contracted for by an entity and used routinely or regularly for provision of health, day care, education, or library services to children under the age of 18, if the services are funded by Federal programs either directly or through State or local governments, by Federal grant, contract, loan, or loan guarantee. The law does not apply to children's services provided in private residences, facilities funded solely by Medicare or Medicaid funds, and portions of facilities used for inpatient drug or alcohol treatment. Failure to comply with the provisions of

the law may result in the imposition of a civil monetary penalty of up to \$1000 per day and/or the imposition of an administrative compliance order on the responsible entity by signing and submitting this application the applicant/grantee certifies that it will comply with the requirements of the Act.

The applicant/grantee further agrees that it will require the language of this certification be included in any 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.

DRAFT