Ohio Community Services Block Grant (CSBG)

Policies and Procedures Manual

EFFECTIVE January 1, 2021
The Ohio CSBG Policies and Procedures Manual (Manual) has been prepared by Development and is intended for use by Development and Ohio’s Community Action Agencies (CAAs). The Manual provides key information contained in federal and state regulations and in the CSBG State Plan. This Manual was developed to assist CAAs in the administration of federal funds and to be a reference on policies and procedures for the management of CSBG grant funding. Failure to comply with requirements set forth in this Manual may result in a default of the CSBG grant agreement. CAAs that fail to comply may be subject to disallowed costs, withholding of grant funds, termination of grant, and/or other potential penalties.

This Manual will be reviewed and revised as needed. CAAs will be notified of all revisions. Policy changes identified in the annual CSBG State Plan or state-issued guidance may result in the modification the contents of this Manual. Should there be a discrepancy, the most recent guidance will take precedent.

**Notice of Enforceability**

Ohio’s CSBG program receives funding from the U.S. Department of Health and Human Services (HHS) to reduce poverty, build strong communities, and provide resources and services to support families in achieving self-sufficiency.

For the purposes of this Manual, a CAA that receives a CSBG grant from Development is considered the grantee for purposes of federal accountability. Development enters into grants with individual grantees to perform CSBG services within specified service areas throughout the state.

All CSBG grantees shall comply with all federal and state regulations including the CSBG Act, Uniform Guidance 2 Code of Federal Regulations (CFR) 200, the Ohio Revised Code (ORC), the Ohio Administrative Code (OAC), this Manual, and any other applicable federal, state, and/or Development policies pertaining to CSBG as designated in the applicable grant agreement. Grantees must also ensure that all partner agencies and subcontractors performing work comply with all applicable CSBG provisions.

Specific provisions of this Manual subsequently amended or rescinded by administrative, legislative, or judicial action shall not negate the force and effect of the remaining provisions.
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Section A – What is CSBG?

1. History of CSBG

Community Action originated with President Lyndon B. Johnson’s War on Poverty and the Economic Opportunity Act, which established the Community Action Program (CAP). Through CAP, public agencies and private nonprofits called CAAs were formed to promote self-sufficiency and respond to immediate social and economic needs within their communities. In 1981, CAP and several other funding streams were consolidated into the CSBG (P.L. 97-35).

Although the purpose of the funding remained the same (i.e. to reduce poverty, revitalize communities, and assist low-income families and individuals to become self-sufficient), the move to a block grant structure shifted a substantial amount of responsibility from the federal government to the states. Each state determines the formula used to distribute the block grant to the network of designated CAAs, taking care that all areas are adequately served.

2. Results-Oriented Management and Accountability (ROMA)

ROMA is a complete management and accountability process that has focused CAA activities and the results achieved. The Monitoring and Assessment Task Force, a task force of federal, state, and local CSBG Network officials, created ROMA in 1994. Based upon principles contained in the Government Performance and Results Act of 1993, ROMA provides a framework for continuous growth and improvement among local CAAs and a basis for state leadership and assistance. It was designed to improve federal program effectiveness and public accountability by promoting a new focus on results, service quality and customer satisfaction. In 1998, the CSBG Reauthorization Act, Section 678E(a)(1), 42 U.S.C. § 9917(a)(1), made ROMA implementation a requirement for receiving federal CSBG funds, and established October 1, 2001 as the start date for reporting CSBG outcomes in the context of ROMA performance-based management principles. This statutory mandate changed both the nature and pace of ROMA implementation throughout the CSBG Network.

Local CAAs are encouraged to undertake a number of ROMA implementation actions that focus on results-oriented management and accountability.

Results Oriented Management Principles

- Assess poverty needs and conditions within the community.
- Define a clear anti-poverty mission for the CSBG Network and the strategies and services to address those needs, both immediate and longer term, in the context of existing resources and opportunities in the community.
- Identify specific improvements, or results, to be achieved among people with low-incomes and the communities in which they live.
- Organize and implement programs, services, and strategies within the agency and among partnering organizations, to achieve anticipated results.
Results Oriented Accountability Principles

- Develop and implement processes to identify, measure, and record improvements in the condition of people with low-incomes and the communities in which they live, that result from CSBG Network intervention.
- Use information about outcomes, or results, among agency tripartite boards and staff to determine overall effectiveness; inform annual and long-range planning; and promote new funding and community partnership activities.
- Encourage state CSBG offices and state CAA to work in coordination to advance ROMA performance-based concepts among CSBG Eligible Entities through ongoing training and technical assistance (T&TA).

3. Theory of Change

In 2011, Community Action leaders began to gather feedback on the core principles of CSBG. The network stated that it was critical for this theory of change to reflect elements of the current CSBG Act, incorporate CAA history, vision and values; as well as include fresh and innovative thinking about the future of our work. The resulting Theory of Change document articulates core principles for the network, identifies CAA national goals, demonstrates CAs unique approach to addressing poverty, and makes a complicated system easier to understand.

The Theory of Change is intended to provide a graphic overview of the core principles, performance management framework, and services and strategies implemented to achieve the goals of Community Action across the nation.

The Theory of Change was developed as a way to explain what Community Action is as a network. The Theory of Change:

- Describes the elements of a common framework CAAs use to produce change.
• Portrays the broad picture of Community Action: long-term goals, core principles, and system capacity.
• Identifies the assumptions and core principles that guide and design services and strategies to reach the long-term goals it hopes to achieve.
• Demonstrates commitment to accountability for the entire network through the Performance Management Framework and specifically to agency excellence through the Organizational Standards.
• Connects the foundation of a high performing national network to the services and strategies implemented by local CAAs in order to achieve the national Community Action goals.

The National Community Action Goals were revised in 2018 from 6 goals to 3. The three goals are as follows:

Goal 1: Individuals and families with low incomes are stable and achieve economic security.
Goal 2: Communities where people with low incomes live are healthy and offer economic opportunity.
Goal 3: People with low incomes are engaged and active in building opportunities in communities.

The image below provides an overview of the goals, services, strategies, core principles and performance management framework that has been nationally established.
4. Fundable Activities

Programs, activities and services supported with funding through the CSBG program shall be intended for the benefit of persons living at or below 125% of the official poverty line defined by the federal Office of Management and Budget (OMB) and amended on an annual basis or at an eligibility level designated by the United States Congress or the federal HHS. New poverty income guidelines will be implemented annually based on the most current OMB information.

The CSBG program will provide activities designed to assist low-income participants, including the elderly, poor, and youth, with the following:

1. To secure and retain meaningful employment;
2. To attain an adequate education;
3. To make better use of available income;
4. To obtain and maintain adequate housing and a suitable living environment;
5. To obtain emergency assistance through loans and/or grants to meet immediate and urgent individual and family needs, including the need for health services, nutritious food, housing and employment-related assistance;
6. To remove obstacles and solve problems which block self-sufficiency;
7. To achieve greater participation in the affairs of the community;
8. To make more effective use of other programs related to the purposes of this subtitle;
9. To provide, on an emergency basis, for the provision of such supplies and services, nutritious food and related services as may be necessary to counteract conditions of hunger among the poor;
10. To coordinate and establish linkages between governmental and other social services programs to assure the effective delivery of such services to low-income individuals; and,
11. To encourage the use of entities in the private sector of the community in efforts to alleviate poverty in the community.
Section B – Development – OCA

Development’s Mission

Development is committed to creating jobs and building strong communities, while ensuring accountability and transparency of taxpayer money and exceptional customer service.

1. Development Responsibilities

Nationally, more than 1,000 agencies work to end the causes of poverty in their communities. Development partners with Ohio’s CAAs to ensure CSBG funds serve those in need. Development provides CSBG funds statewide for support services such as employment, education, housing, emergency assistance and nutrition.

In accordance with the CSBG Act, ORC 122.69, and policies detailed in the CSBG grant agreement, Development is responsible for monitoring the use of CSBG funds and how funds are used to provide services. Development’s current administrative structure is as follows:

- Community Services Division
  - Chief
  - Assistant Chief
    - Office of Community Development
    - Office of Community Assistance
      - Deputy Chief
      - Assistant Deputy Chief
        - Office of Community Assistance Programs Manager
        - 7: Community Development Analysts
2. CSBG State Plan

The CSBG Act requires that states submit a CSBG State Plan to HHS for each contract period to describe the states’ proposed use of CSBG funds and include assurances that CSBG will be used in accordance with legislative intent. Development creates and submits a CSBG State Plan every two years.

Development is required to solicit public comments during the process of developing the CSBG State Plan. Development typically holds several listening sessions, public and legislative hearings, conducts an electronic survey and continuously solicits feedback from stakeholders. The feedback collected is a key tool in ensuring that Ohio is administering the CSBG program in alignment with the needs and goals of the community. CAAs are encouraged to submit feedback at any time by contacting Development or sending an email to CSBG@development.ohio.gov. Revisions to the CSBG State Plan may be made in response to written and verbal public comments. The draft and final versions of the CSBG State Plan are posted on Development’s website and an electronic copy is sent to each Ohio CAA that receives CSBG funds.

Included in the CSBG State Plan is how Development will allocate funds to each CAA. The allocation method is as follows:

90% for Eligible Entities + 5.5% Discretionary and Training and Technical Assistance (T&TA) + 4.5% State Admin. = 100% of Grant

Discretionary funds: The State of Ohio sets aside up to 5.5% of CSBG funds in accordance with Sec. 675.C(b)(1)(A through H) of the CSBG Act with 4.5% of the discretionary funds allocated to T&TA organizations who provide personalized assistance to CAAs. A total of 1% of the discretionary funds are set aside for special projects. Priority for discretionary funds is given to those requests that provide new and innovative direct services programs that align with the priorities listed in the CSBG State Plan. Examples of discretionary funds requests might include T&TA, support for an asset-building program, and activities that are within guidelines of the federal regulation.

3. CSBG Annual Report

Section 678 (E) of the CSBG Act requires states to annually prepare and submit a report on the measured performance of the state and the CAAs in the state. To meet the CSBG Annual Reporting requirement, states collect information from the CAAs on the uses and results of CSBG for the prior reporting period, and report the data to HHS before March 30 each year. The CSBG Annual Report includes an account of the expenditures of funds, customer characteristics, services provided, and the outcomes achieved. The CSBG Annual Report is also used to improve performance, track results from year to year and assure accountability.
The CSBG Annual Report supports an enhanced focus on improved data collection, analysis, and continuous learning and is organized into four (4) Modules.

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<th>Module 1</th>
<th>State Administration</th>
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<td>• This Module includes data on the state administration and distribution of funds, the state administrative and discretionary funds for T&amp;TA, a list of CAAs and their progress with the Organizational Standards and the state’s progress of meeting statewide goals and accountability measures.</td>
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<th>Module 2</th>
<th>CSBG Eligible Entity Expenditures, Capacity and Resources</th>
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<td>• This Module includes data on CSBG expenditures, hours of CAAs capacity building, volunteer hours, staff certifications, partnerships and funding resources.</td>
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<th>Module 4</th>
<th>Individual and Family Level</th>
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<td>• This Module includes data on individual and family NPIs, individual and family services and activities and customer characteristics.</td>
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4. **CSBG Monitoring Process**

The CSBG Act section 678 (B) requires that the state shall conduct a “full onsite review of each CSBG grantee at least once every three years”. The monitoring process is Development’s principal method for determining CAAs’ compliance, evaluating actual accomplishments against planned activities, and determining the effectiveness of CSBG policy. Monitoring provides objective reporting and recommendations to address any deficiencies and needs. The monitoring process also allows Development to identify CAAs’ best practices and innovative initiatives.

In accordance with the CSBG State Plan, onsite monitoring visits are conducted every other year. Monitoring visits are generally arranged with the CAA in advance. The monitoring visit includes; staff introduction, an agency tour, review of the required materials and an exit interview. The monitoring tool is provided in advance to each CAA. The CAAs are required to use the monitoring tool to conduct a self-assessment in advance of the monitoring visit and assemble
documentation of their performance on each Organizational Standard and customer file documentation. Documentation for each Organizational Standard must be made available during the monitoring visit. Examples of appropriate documentation may include items such as sign-in sheets, governing board rosters, governing minutes, etc. The Organizational Standard supporting documentation can be provided in electronic or hard copy format. For each standard, CAAs will be assessed as *Met or Not Met* at the time of the visit. The CAAs will receive a copy of the completed monitoring tool at the conclusion of the onsite visit as part of the standard exit interview.

The official monitoring report is sent to the CAA within 45 days of the monitoring visit. The monitoring report will indicate if a response is required and the timeframe for the submittal of the response, which is generally 30 days after the receipt of the report. CAAs will have an opportunity to respond and provide evidence of meeting a standard or addressing any other compliance issue(s) subsequent to the onsite visit. In accordance with HHS Information Memorandum (IM) 138, in cases where CAAs may be unable to meet the standard in a reasonable time frame contingent on targeted technical assistance, Development and the CAA may develop a Technical Assistance Plan (TAP) or a Quality Improvement Plan (QIP).

In 2012, an agreement was formed between HHS and the Center of Excellence (COE) to develop and disseminate a set of Organizational Standards for eligible entities. This process also included a CSBG working group that was comprised of CAAs, State CSBG Lead Agencies, Community Action State Associations, national partners, technical assistance providers and external content experts. This extensive process led to the development of the Organizational Standards. The Organizational Standards are a comprehensive set of standards developed by the CSBG Network. The purpose of the Organizational Standards is to ensure that all eligible entities have appropriate organizational capacity, not only in the critical financial and administrative areas important to all nonprofit and public human service agencies, but also in areas of unique importance for CSBG funded eligible entities.

With the CSBG State Plan, Development elects to utilize the CSBG Organizational Standards developed by the COE. Development’s CSBG monitoring tool provides guidance for each category of the Organizational Standards. The information in the guidance includes examples of documentation that can be used to meet compliance in each category. The Organizational Standards are organized into nine categories. The following is a list of details and requirements of each category:

**Maximum Feasible Participation**

Category 1: Consumer Input & Involvement. Category 1 is designed to demonstrate the CAAs are working collaboratively with low-income customers as well as other members of their community.

- Analysis of low-income individuals' participation must be documented.
- Reporting of customer satisfaction data must be documented in signed and approved board meeting minutes.

Category 2: Community Engagement. Category 2 is designed to demonstrate that CAAs have developed formal and informal partnerships and utilizes data from low-income customers and community partners from key sectors, which at a minimum include: community-based organizations, faith-based organizations, private sector, public sector and educational institutions.

- Community partnerships must be documented.

- Information used for the community assessment from key sectors must be documented and include sources from community-based organizations, faith-based organization, the private sector, public sector and educational institutions.

- Organization activities and results shared with the community must be documented.

- Volunteer hours must be documented.

Category 3: Community Assessment. Category 3 is designed to demonstrate that CAAs have conducted a comprehensive community assessment in accordance with the CSBG Act. 42 Section 678B, U.S.C. § 9914.

- A community assessment must be completed every three years.

- The community assessment must be dated.

- The community assessment must include current data specific to poverty as it relates to gender, age, and race/ethnicity.

- The community assessment must include both qualitative and quantitative data and include key findings regarding the causes and conditions of poverty as well as a summary of the needs of the community.

- It must be documented in signed and approved board minutes that the governing board has approved/accepted the community needs assessment within 90 days of its completion.

Vision and Direction

Category 4: Organizational Leadership. Category 4 is designed to demonstrate the foundation of the CAAs and that the mission of the CAA is exemplified throughout the entire agency.
• It must be documented in signed and approved board meeting minutes that the governing board has reviewed the CAA’s mission statement within the last five years to ensure that 1. it addresses poverty and 2. the CAA’s programs and services are in alignment with the mission.

• It must be documented in signed and approved board meeting minutes that the governing board has received an annual update on the success of specific strategies included in the CSBG grant application.

• The CAAs must have a written Succession Plan for the CEO/ED that includes procedures for emergency/unplanned, short-term absence of three months or less and filling a permanent vacancy.

• It must be documented in signed and approved board minutes that the governing board has approved the Succession Plan.

• The CAAs must complete a comprehensive Risk Assessment every two years.

• It must be documented in signed and approved board meeting minutes that the completed Risk Assessment has been approved by the governing board.

Category 5: Board Governance. Category 5 is designed to demonstrate that CAAs have a tripartite board structure in accordance with the CSBG Act. 42 Section 678B, U.S.C. § 9914 and Information Memorandum #82 to ensure maximum participation and the organization’s success. The board must be comprised of: one-third membership of elected officials currently holding office or their designated representative, one-third membership of low-income representatives of the community served, and the remainder one-third membership should be representatives of major groups and interests in the community, such as business, religion, education, labor, etc.

• The CAAs must have a current governing board roster on Development’s designated form. This roster must be maintained using the designated form. If there are any changes to the board roster, CAAs must provide this roster to Development.

• **CAAs must provide documentation that each governing board member has a signed board appointment letter that matches their current board term.** Board appointment letters must be on letterhead from the appointing agency and must include term beginning and end dates.

  ➢ Public and Private Sector Board Appointment Letters: Each board member elected to the board under the Public and Private Sector must have a board appointment letter that contains the name of the
appointee, reflects the duration of the appointment, the signature of an authorized official from the organization the appointee represents, and must be on official letterhead.

➢ Low-income Sector Board Appointment Letters: Each board member elected to the board under the Low-income Sector must have documentation that reflects a democratic selection process took place. Examples of appropriate documentation are, committee meeting minutes, voting ballots, official appointment letter from an agency representing low-income individuals in the community served that states a democratic selection process. NOTE: The appointment letter should follow the same format as the Public and Private Sector.

• The CAAs must have the organization’s bylaws reviewed by an attorney every five years. Verification of the review must be documented.

• All CAAs’ board members must receive a copy of the current bylaws every two years. Verification of receipt must be documented.

• CAAs must provide signed and approved board minutes to verify that the governing board meetings are conducted, and governing board vacancies are filled in accordance with the requirements stated in the CAA’s bylaws.

Note: In accordance with the Ohio Sunshine Laws, 1. Board meetings must be conducted in person, CAAs may not conduct a meeting via electronic or telephonic conferencing and 2. No vote or other decision-making actions may take place in executive session.

• CAAs must provide documentation that each governing board member has signed and dated a Conflict of Interest policy every two years.

• CAAs must provide verification that each governing board member has received board orientation within six (6) months of being elected to the governing board.

• CAAs must provide verification that each governing board member receives training on their roles and responsibilities every two (2) years.

• CAAs must provide verification that the governing board receives programmatic reports at each regular board meeting.

Category 6: Strategic Planning. Category 6 is designed to ensure that CAAs assess and plan adequately for the future success of the organization.

• The CAAs must complete a comprehensive Strategic Plan every five years.
• It must be documented in CAA’s approved and signed board meeting minutes that the completed Strategic Plan has been approved by the governing board within 90 days of its completion.

• The approved Strategic Plan must address poverty, revitalization of low-income communities and/or empowerment of people to become more self-sufficient.

• The approved Strategic Plan must include family, agency and/or community goals and customer satisfaction data from the community assessment.

• It must be documented in CAA’s signed and approved board meeting minutes that the governing board receives Strategic Plan progress reports annually.

Operations and Accountability

Category 7: Human Resources Management. Category 7 is designed to ensure that all levels of the CAA have a strong relationship with its staff and the staff reflects the organization’s values and mission.

• The CAAs must have written personnel policies.

• It must be documented in CAA’s signed and approved board meeting minutes that the governing board has approved the organization’s personnel policies.

• CAAs must have the organization’s personnel policies reviewed by an attorney every five (5) years. Verification of the review must be documented.

• It must be documented in CAAs’ signed and approved board meeting minutes that the governing board has approved the organization’s Whistleblower policy.

• CAAs must provide verification that personnel policies and any changes are made readily available to all employees.

• CAAs must have written job descriptions for all positions. Verification that job descriptions are updated every five years must be provided.

• CAA must provide verification that the organization has a policy for regular written employee evaluations.

• CAAs must provide verification that the governing board conducts a performance appraisal of the CEO/Executive Director annually.
• CAAs must provide verification that the governing board reviews and approves the CEO/Executive Director’s compensation annually.

• It must be documented in CAAs’ signed and approved board meeting minutes that the full governing board has approved the CEO/Executive Director’s performance appraisal and compensation annually.

Category 8: Financial Operations and Oversight. Category 8 is designed to ensure that the CAAs have sound financial management in order to manage public funds to carry out a public mission.

• CAAs must provide verification that the organization’s annual audit is completed by a Certified Public Accountant on time in accordance with Title 2 of the CFR, Uniform Administration Requirements, Cost Principles and Audit Requirement and/or state audit threshold requirements.

• CAAs must provide verification that all findings from the prior year’s annual audit have been assessed and addressed by the organization.

• It must be documented in CAAs’ signed and approved board meeting minutes that the Certified Public Accountant presents the audit to the governing board annually.

• It must be documented in CAAs’ signed and approved board meeting minutes that the governing board accepts the annual audit.

• CAAs must provide verification that the organization has solicited bids for their Single Agency Audit every five years. CAAs must follow procurement methods as outlined in 2 CFR 200.320 and 200.509.

• CAAs must provide verification that the IRS Form 990 is completed annually and presented to the governing board.

• It must be documented in CAAs’ signed and approved board meeting minutes that the governing board receives financial reports at each regular board meeting. Financial reports must include: organization-wide report on revenue and expenditures that compares budget to actual, categorized by each program and a Statement of Financial Position that includes the organization’s financial position.

• CAAs must provide verification that all required payroll payments and filings are completed on time.

• It must be documented in CAAs’ signed and approved board meeting minutes that the governing board approves the organization-wide budget annually.
• CAAs must provide verification that the staff reviews fiscal policies every two (2) years.

• It must be documented in CAAs’ signed and approved board meeting minutes that the governing board approves any changes to the organization’s fiscal policies.

• It must be documented in CAAs’ signed and approved board meeting minutes that the governing board reviews the organization’s Procurement policy every five (5) years.

• CAAs must provide verification of the organization’s policy or process for all shared cost.

• CAAs must provide verification that the organization has a written Record Retention and Destruction policy.

Category 9: Data and Analysis. Category 9 is designed to ensure that CAAs are collecting and analyzing data to guide their policies, procedures and decision-making processes.

• CAAs must provide verification of the organization’s customer demographic tracking and reporting systems.

• It must be documented in CAAs’ signed and approved board meeting minutes that the governing board receives an analysis of the organization’s outcomes, program adjustments and improvements annually.

5. Corrective Action

CAAs that fail to meet the terms of the federal regulations, state policies and procedures, and/or their own policies and procedures, may face corrective action. This section outlines the process for Corrective Action.

a. Causes

Issues that may result in corrective action include but are not limited to the following:

• Significant or repeated findings from monitoring visits
• Declining performance (i.e. not expending CSBG funds, not achieving goals established in the grant application, etc.)
• Complaints from customers, employees, the governing body, legislators, media or other governmental agencies
• Late, incorrect, or incomplete report(s) or application(s)
• Significant and unusual fiscal or audit issues
• High turnover in staff at the agency
• Any action that has placed a customer in imminent danger
• TAP/QIP

If Development determines that there are deficiencies that must be corrected, Development must document and communicate the specific deficiencies with the CAA and offer T&TA to help the CAA correct any deficiency.

b. Technical Assistance Plan (TAP)

Development will issue a TAP to identify the deficiencies as well as track and monitor the CAA’s progress to correct the deficiencies. CAAs must complete Development’s CSBG Technical Assistance Plan Tracking Form and return the completed form to Development by the date listed at the top of the form.

Please use the link below to access the Development CSBG Technical Assistance Plan Tracking Form.

c. Quality Improvement Plan (QIP)

In accordance with CSBG Act. 42 Section 678C, (4) (a) U.S.C. § 9914 if a CAA fails to correct any deficiencies stated in a TAP, the CAA will be placed on a QIP to correct the deficiencies in a reasonable period of time. The QIP will state the identified deficiencies, the strategies to correct the deficiency, and specific timeframes for correcting the deficiencies.

NOTE: A QIP will be issued for all Organizational Standards that were not met or resolved during the previous monitoring visit. Should a CAA fail to meet the requirements of a TAP, a QIP will be issued. Should a CAA fail to meet the requirements in a QIP, it may result in further correction action such as, but not limited to, termination of grant funding.

Section C – CSBG CAAs

1. CAAs’ Responsibilities

The federal CSBG Act designates the following types of agencies as eligible to receive CSBG funds:

a. CAAs: CAAs are, private and public nonprofit organizations that carry out the CAP. There are over 1,000 CAAs in the United States and its territories. Ohio has 47 CAAs, each of which serves a specific geographic area. The ORC 122.69 details the process for designating a CAA in Ohio.

b. Organizations Serving Migrant Farmworkers: In Ohio, United Migrant Opportunity Services has been designated as a CAA to receive CSBG funds to serve migrant farmworkers.
2. Community Action Plan/CSBG Grant Application

*CSBG Act section 678 (B)* requires that states receive a Community Action Plan from each CAA that receives CSBG funding. Each CAA submits their Community Action Plan as part of the CSBG grant application. Grant applications are submitted electronically every two (2) years.

The Community Action Plan provides a detailed account of the specific needs of those in poverty in the CAA’s community as identified in the community assessment. The Community Action Plan should provide a specific plan to address the identified needs. Each Community Action Plan should include Organization Information, Agency Resources, a CSBG Budget, and ROMA Workplans. Development expects CAAs to involve their governing board and the community when creating the plan.

3. CSBG Grant Agreement

The CSBG grant agreement is a legally binding document that describes the financial relationship between Development and the CAAs. Once the CSBG grant application/Community Action Plan has been submitted and approved, Development will send the CAAs a grant agreement for final review and signature. The grant agreement includes details regarding: use of grant funds, certifications and assurances requirements, reporting guidelines and due dates, as well as other federal, state, and local obligations.

4. CSBG Reporting

Submitting timely and accurate financial and programmatic reports is required in the CSBG grant agreement. The ROMA reports provide Development with information to analyze individual agency and statewide performance on a quarterly and annual basis. ROMA reports must accurately reflect activity occurring during the reporting period. The financial reimbursement requests are used by the CAA to draw down funds from Development. They must accurately reflect financial activity (expenditures and actual obligations) for the reporting period.

The reports are identified, and the due dates for each are listed in the grant agreement. This section reiterates the reports, their due dates, and a brief description of each report. Should there be a discrepancy, please follow the reporting requirements as outlined in the CSBG grant agreement.

a. Financial Monthly Reports

The CSBG financial monthly report must be submitted electronically by 5 p.m. of the tenth (10th) day following the end of each month until all grant funds are expended, or the CSBG grant agreement terminates. The report for each month of the term of the CSBG grant agreement is to be submitted whether or not costs are incurred. If the tenth (10th) day occurs on a weekend or state
designated holiday, reports are due by 5 p.m. the next business day. All report forms must be completed according to the instructions. All reports must be submitted on the forms provided by Development.

b. **ROMA Quarterly Reports**

ROMA quarterly reports are a tool for both Development and the CAAs to evaluate performance outcomes. Evaluating agency data on a quarterly basis plays a significant role in planning and measuring program goals and budget expenditures. The ROMA quarterly reports are based on targets defined in the CAA’s Community Action Plan/CSBG grant application. Once reviewed, it allows both parties to discuss and adjust targets if necessary.

ROMA quarterly reports must be submitted electronically by the dates specified in the CSBG grant agreement or as determined by Development. All report forms must be completed according to the instructions as provided by Development.


In accordance with 2 CFR 200.80, “Program Income means gross income earned by the non-Federal entity that is directly generated by a supported activity or earned as a result of the Federal award during the period of performance.”

“Program income includes but is not limited to income from fees for services performed, the use of rental of real or personal property acquired under Federal awards, the sale of commodities or items fabricated under a Federal award, license fees and royalties on patents and copyrights, and principal and interest on loans made with Federal funds. Interest earned on advances of Federal funds is not program income. Except as otherwise provided in Federal statutes, regulations, or the terms and conditions of the Federal award, program income does not include rebates, credits, discounts, and interests earned on any of them.”

The Generated Income Report must be prepared and submitted according to the instructions and dates specified in the CSBG grant agreement.

b. **Annual Report**

The CSBG Annual Report is a part of the greater CSBG Performance Management Framework and ROMA Next Generation efforts. The CSBG Annual Report supports an enhanced focus on improved data collection, analysis, and continuous learning. Information will be used at all levels (national, state, and local) to improve performance, track results from year to year and assure accountability for critical outcomes. Development collects and compiles data from all CAAs. This data is reported to HHS annually. The CSBG Annual Report is not only used as a tool to report data to HHS but it is also used to demonstrate that the ROMA cycle is followed, measure statewide
success as well as identifying ideas for new innovative programs and services. The CSBG Annual Report must be submitted electronically by the date specified in the CSBG grant agreement or as determined by Development. All report forms must be completed according to the instructions as provided. CAAAs are also required to submit a final CSBG financial report. The final CSBG financial report provides specific details on CAAAs’ expenditures. No budget categories may be overspent on the final financial report.

5. Customer Intake Process

a. Income Calculations

Eligibility for services under CSBG is determined on the basis of a household’s income in relation to federal HHS poverty income guidelines issued annually and published in the Federal Register. Updated federal poverty income guidelines are effective immediately upon publication in the Federal Register unless otherwise specified by HHS.

Households at or below one hundred twenty-five percent of the official poverty line, or at an eligibility level designated by the United States Congress or HHS, shall be eligible for all services provided by CAAAs. For purposes of determining income eligibility for all activities, the period to be used in determining annual income must not be more than 12 months nor less than the 30-day period preceding the request for assistance. Countable and excluded income types and specific guidance on how to calculate income can be located in the Energy Assistance Programs Guidelines that are updated annually. The Energy Assistance Programs Guidelines can be found on the Office of Community Assistance Provider Page: https://development.force.com/OCAKnowledgeArticles/s/.

b. Income Reverification (Re-Establishing Customer Eligibility)

Household income for CSBG services must be re-verified every twelve months or anytime the customer’s income has changed. This reverification also includes completing a CSBG Intake Form. In addition, the customer’s income must be reverified if the poverty income guidelines have changed since the customer’s last visit, which will also need to be documented on an updated CSBG Intake Form.

**Note:** Customers, who are in the midst of a CSBG funded program and have an income increase that makes them ineligible, must be permitted to complete the program.

c. Self-Declaration of Income Statement

Any household unable to supply complete income documentation must sign a self-declaration of income statement. If an agency representative has reason to believe that income documentation does in fact exist, a concerted effort must be made to obtain complete and up-to-date income documentation. Qualifying an applicant to receive CSBG-funded services through the acceptance of a
self-declaration of income statement should occur only when all attempts to obtain actual income documentation have failed. Persons claiming zero income must explain in detail their ability to meet their needs, i.e. their source(s) of food and shelter etc.

The self-declaration statement should contain a "Certification and Waiver of Privacy Rights" statement. The applicant shall be informed that the CAA will check to verify the information on the self-declaration statement, and that by signing the "Certification and Waiver of Privacy Rights" statement the applicant authorizes the release of confidential information for income verification purposes.

The CAA must make a reasonable number of spot checks of family units to verify income given in the self-declaration statements. In making the spot checks, the CAA should contact appropriate sources, such as employers, local departments of human services, the social security administration, or other appropriate sources to obtain written documentation. This documentation should be attached to the self-declaration statement.

d. Categorical Eligibility

Households receiving public assistance from the U.S. Department of Health and Human Services (Prevention, Retention Contingency; Ohio Works First; Temporary Assistance to Needy Families (TANF); and Disability Assistance) are considered to be categorically eligible for CSBG-funded services. However, these sources of income/public assistance and the associated dollar amounts must be documented.

e. Income Documentation for Target Areas

For some programs, aimed at certain groups, especially youth and children, it may be difficult to obtain income documentation for each individual. In these cases, CAAs may document income levels in targeted geographic areas in order to verify the extent to which customers within that area are income eligible. Documentation of target areas must be based on census tract data or other valid measures of the incidence of poverty within a defined geographic area within the CAA’s service territory. At least 51% of target area residents must be income eligible in order for CSBG services to be provided to the group on this geographic basis. The documentation and a request for a waiver from documenting household income for program participants must be submitted to Development for review and approval. Waiver requests must explain in detail why it would be impossible or a hardship to collect income documentation for the CSBG-funded program in question. Services cannot be offered until the waiver is approved. A waiver from individual household income documentation does not however constitute a waiver for completion of a CSBG Intake Form. A CSBG Intake Form must be completed if at all feasible and placed in the customer file. In the case where Intake Forms cannot be obtained, documentation of the waiver approval should be in the customer file.

f. Required Income Documentation
When programs or projects are funded by more than one funding source, income documentation is not always required for 100% of the customers participating. The amount of CSBG funds spent to support a program expressed as a percentage of the total program budget may be used to determine the minimum percentage (number) of customers that must be demonstrated to be income-eligible for the CSBG-funded services in accordance with CSBG guidelines.

For example – CSBG provides 5% of total program funding for Buckeye CAP’s Senior Medication Program which serves 200 seniors. CSBG income eligibility documentation is required for at least 5% of the participating seniors. In this case, CSBG income eligibility documentation would be required for at least 10 participants.

6. Customer Records

The following information should be uploaded into the CSBG customer's electronic application or maintained as a hard copy file:

- Household Income
- Documentation of the customer’s CSBG benefit, i.e. a copy of the rent/mortgage invoice and CAA’s payment to the vendor along with the cancelled check, or a copy of the training certification received.
- If applicable, verification of any required co-payments. If the maximum benefit is not sufficient to continue service, documentation that the customer has made a co-payment must be obtained prior to processing the CSBG benefit. Include appropriate comments in the customer’s file.
- If applicable, proof of permanent disability.
- A completed, signed, and dated CSBG Intake Form.
  - Social Security Numbers are required for all eligible household members, regardless of age. For those that have applied for numbers but have not yet received them, mark it as "applying for" in the system for the first program year. In subsequent program years, the Social Security Number must be obtained in order to continue the processing of the application.
- If the application is denied, documentation and notes supporting the reason for ineligibility.
- Pending/Incomplete Documentation

Customers’ records should be maintained in accordance with the CAA’s approved retention schedule and the CSBG grant agreement.

7. Code of Ethics

In accordance with ORC 122.70 (G), the board of directors of a CAA must adopt a Code of Ethics for the board of directors and the employees of the CAA. Each CAA must post notices in a conspicuous place indicating the Code of Ethics is available for public inspection at the CAA during normal business hours.
8. Customer Appeals Process

CAAs are required to ensure that all customers are advised of the CSBG appeals process. The process should also be posted in areas that are accessible to customers. CAAs shall supply Development with a copy of its appeal process when requested.

Section D – CSBG Discretionary/Training and Technical Assistance (T&TA) Funds

1. CSBG Discretionary/T&TA Funding

T&TA funds are available on a limited basis to provide financial assistance for projects that will address a CAAs’ T&TA needs now and in the future. The following guidelines are to be followed when applying for these funds.

1) There is no ceiling on the amount of T&TA funds that can be requested. However, Development reserves the right to reduce or deny any amount that appears excessive or unreasonable. CSBG discretionary funds may be used to pay for a portion of a larger, more costly project. CAAs should not plan a project based on what is available from the CSBG discretionary/T&TA funds.

2) While there is no requirement to match the grant with other funds, agencies are strongly encouraged to provide matching funds whenever possible.

3) This grant may not be used to pay for general administrative costs.

4) Development will review applications in order of receipt.

5) Proposed activities may address but are not limited to the following areas:

• Program Development;
• Personnel Management;
• Technology;
• Fiscal Operations/Management;
• Board Training; and
• Strategic Planning or implementation of specific projects that have been identified as a result of a strategic planning process

Examples of allowable expenditures include: computer software and hardware, consultant fees, training manuals and publications, seminar site costs, registration fees, and trainers’ travel expenses. You may be required to submit an agency-wide computerization plan if funds for hardware are requested.

When requesting CSBG discretionary T&TA funds, CAAs must submit a Letter of Intent to their assigned Field Representative that includes:
1) Name, purpose/goals, scope for the project, and explanation of why the monies are needed.
2) Timeframe for start and end date (project out at least three to four weeks for start date.)
3) Project budget including requested dollar amount and fair share of other programs dollar amounts, if any.
4) Approved and signed board meeting minutes demonstrating board approval or a projected date for board approval.

If funds are available and the proposal is approved by Development, the CAA will be prompted to complete the electronic application. Please note the application is not officially approved until the CAA signs and submits a signed grant agreement.

**Note:** If a unit cost is $5,000 or more, three (3) written competitive bids, and a written justification, are also required. An explanation of which bid was chosen and why should be explained in a narrative.

Please indicate what, if any, professional/consultant assistance will be needed. Development requires three (3) bids for professional services be solicited. If a CAA is not able to obtain three (3) bids, please provide an explanation. Provide a resume and/or capability statement for outside groups that will conduct all or part of the work.
Section E – Accounting and Financial Procedures

1. Applicable Circulars, Federal Policies and Standards

All CAAs are required to follow Generally Accepted Accounting Principles. The following federal rules govern the CSBG program:

- 2 CFR 200: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

Grants must also adhere to provisions in the CSBG grant agreement, the Ohio CSBG Policies and Procedures Manual, CSBG Application Instructions, ORC, OAC, and other directives of Development.

2. Internal Accounting Controls

Internal accounting controls refers to all of the various policies and procedures a CAA uses to minimize the risk of loss or inaccurate financial statements, and to conduct operations in an efficient manner. They include, but are not limited to the following:

- Segregation of duties;
- Adequate accounting system access;
- Safeguarding assets;
- Accurate and timely recording of transactions;
- Reconciliation of accounts and cash; and
- Adequate approval authority.

The purpose is to establish and maintain effective internal controls that provide reasonable assurance that management of the award is in compliance with federal statutes, regulations, and terms and conditions of the award. Grantees are encouraged to utilize the Standards for Internal Control in the Federal Government (the Green Book) issued by the Comptroller General of the United States or the Internal Control Integrated Framework issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

3. Legal Compliance

All grant agreements come with restrictions as to what costs are allowable and as to what financial management practices are permissible. The CAA should consult
2 CFR 200, Development information updates and manuals, and the CSBG grant agreement. Auditors generally test compliance with those laws, rules and regulations which, if violated, could have a material impact on the program or the CAA.

4. Audits

CAAs of CSBG funds are subject to the audit requirements described below. CAAs should reference 2 CFR 200, Subpart F, Audit Requirements for specific information regarding single audits.

If total federal expenditures in a grantee’s fiscal year are less than $750,000, a financial statement audit is required. It must be completed in accordance with Generally Accepted Governmental Auditing Standards. One (1) copy of the audit report must be submitted to Development within nine (9) months following the end of the entity’s fiscal year or within 30 days following the issuance of the report, whichever is earlier. It should be sent to: Special Projects Coordinator, the Ohio Development Services Agency Audit Office, P. O. Box 1001, Columbus, Ohio 43216-1001 or emailed to singleaudit@development.ohio.gov.

Single Audits

If total federal expenditures in a grantee’s fiscal year are more than $750,000 or more, a single audit of the entity is required. The audit report is submitted to the Single Audit Clearinghouse (SAC) as part of the reporting package. The reporting package is due within nine (9) months following the end of the entity’s fiscal year or thirty (30) days from the date it was issued by the auditing firm, whichever is earlier. Within seven (7) days following submission, the grantee must notify Development that the reporting package was sent to the SAC. Notification should be emailed to singleaudit@development.ohio.gov. Grantees may include an electronic copy of the audit report with the notification.

Audit fees charged to grants or indirect cost pools will not be allowable if audit reports are not submitted by the timeframes specified above.

5. Equipment: Inventory, Procurement and Disposition

Purchase, rental, or lease of equipment is an allowable use of CSBG funds provided all of the following criteria are met: 1) the budget includes a description and unit cost of the equipment; 2) the purchase, rental or lease is the best financial option to satisfy grant needs; and 3) it is necessary for the performance of CSBG projects.

Inventory
For CSBG, equipment is defined as expendable or non-expendable.
• Non-expendable equipment has a useful life of one year or more and a unit cost of $1,000 or more. Title or ownership of equipment acquired with grant funds remains with the grantee. However, Development retains a reversionary interest in the equipment. Non-expendable equipment must be inventoried utilizing the Property Inventory Form (Form 124). This applies to equipment purchased in whole or in part with CSBG funds since October 1, 1990. All information on the form must be completed.

• Expendable equipment has a unit cost of less than $1,000 and a useful life of less than one year. Expendable equipment is not required to be inventoried. However, the grantee may wish to maintain an inventory on items that have a high theft or loss level, e.g., laptops, cellular phones, etc.

**Procurement**

The grantee should follow its own written procurement policies when purchasing equipment unless this policy is more restrictive.

Any equipment with an acquisition cost of under $5,000 may be acquired without prior grantor approval when it is contained in an approved budget.

Separate, written approval from Development is required for all equipment with a unit cost of $5,000 or more prior to its purchase. The written approval will be contained in the application cover letter, budget modification cover letter, or in separate correspondence.

CAAs should submit at least three written competitive quotes, criteria for evaluating the quotes, and the selection of the successful quote. When the lowest amount is not accepted, the grantee must justify why the best quote was not the lowest one.

For equipment with a unit acquisition cost over the simplified acquisition threshold (currently at $250,000), grantees should contact their Field Representative for instructions.

**Disposition**

Disposition of equipment purchased with CSBG dollars that had an acquisition cost of under $5,000 does not require prior Development approval. The provisions in 2 CFR 200.313 (e) should be followed.

For any item of equipment purchased with CSBG funds that had an acquisition cost of $5,000 or more, written approval is required before the equipment can be disposed. Disposal can be through sale, trade-in, scrap, or donation.

Grantees should submit a written request to dispose of equipment, to their Field Representative. The request should include the current Property Inventory Form and describe the equipment including serial or identification number, date of purchase and preferred method of disposition. Following Development approval, disposition information should remain on the, CSBG Equipment Inventory Form,
for one additional grant cycle. After that period, it may then be removed from the form.

When equipment is approved for sale, the grantee must allow for open competition and avoid conflicts of interest, real or apparent. The grantee must accept the highest bid for the equipment. Documentation of competition and all the bids must be retained.

The grantee may retain $500 or 10% of the proceeds, whichever is less, from the sale of the equipment. The balance must be credited to expenses in the equipment cost category of the current CSBG.

6. Close-out / Carryover

Following review and approval of the final CSBG financial report, Development will confirm the amount of carry-over and specify a date for submission of a budget revision to reprogram the funds. The budget revision must be submitted electronically by the date specified by Development. All forms must be completed according to the instructions as provided by Development. CAAs should monitor the amount of funds that are expended during the grant cycle to ensure that services are being provided and funds are being utilized in accordance with the CSBG grant application and CSBG grant agreement. Development reviews the average state-wide percent of carryover funds and may require CAAs to create or modify program outcomes to expend funds appropriately. CAAs with excessive carryover for multiple program years may be place on a TAP to develop a plan to ensure funds are utilized appropriately.

7. Fidelity Bond

A CAA receiving funds from Development is required to maintain surety fidelity bonding insurance that meets the following criteria:

- Covers all staff and board members who are directly responsible for fiscal control.
- The minimum liability shall be equal to the overall highest estimated cash balance on any given day of the year.
- Covers current program period.
Section F – Closeout or Termination of CSBG Grantee

It is necessary to have procedures and requirements established in the event that a CAA grant or program closeout is necessary. In the event of a state-wide closeout, the federal funding source would provide closeout instructions which could alter the procedures listed below.

When a closeout is necessary, there are a number of activities that must occur. Some of these activities are the responsibility of the CSBG CAA, and some are the responsibility of Development.

1. Development Responsibilities

During the closeout, Development will have primary responsibility for the following:
- Notify the CAA of the effective termination date and provide the appropriate closeout instructions.
- Revise grant agreements, if necessary, to encompass closeout activities, identify allowable costs, and provide adequate funds to accomplish closeout. When determining closeout costs, Development will be guided by the appropriate guidance from HHS and the Uniform Administrative Requirements.
- Determine disposition of grant-purchased equipment.
- Assist the CAA as necessary to accomplish a timely closeout.
- Monitor the CAA closeout activities to assure accurate and timely completion.

Development’s OCA Deputy Chief is the primary point of contact for the CAA.

2. CAA Responsibilities

During the closeout, the CAA will have primary responsibility for the following:
- Submit final reports as required by the date specified by Development.
- Final financial report must reflect grant expenditures for the entire grant cycle.
- All grant receivables must be collected, and liabilities paid. There must be no obligations on the final financial report.

Closeout will be considered complete when all of the activities listed above are executed (program property is secured; program obligations are paid). Please see OAC Chapter 122:5-1-03 for additional information regarding closeout.
3. Emergency Provider

In the event of termination of any provider of CSBG and in order to achieve continuity of services to eligible customers, Development may at its discretion, assign a temporary provider.

4. Public Hearing

At the time a permanent CAA is chosen, a public hearing will be held in accordance with OAC Chapter 122:5-1-04 to make the announcement and take all public comments. Please note, a public hearing is not required to name an emergency temporary provider.

Resources

Please visit the OCA CSBG Provider Page to access the resources listed in this manual.

https://development.force.com/OCAKnowledgeArticles/s/
# Glossary of Community Action Acronyms

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<tr>
<th>Acronym</th>
<th>Description</th>
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<tbody>
<tr>
<td>ACF</td>
<td>&quot;Administration for Children and Families&quot; is a division of HHS. ACF's mission is to promote the economic and social well-being of children, families, individuals and communities with leadership and resources for compassionate, effective delivery of human services. ACF administers numerous federal grant programs common to CAAs, such as CSBG, Head Start, Community Economic Development (CED), Low-Income Home Energy Assistance Program (LIHEAP), and Social Services Block Grant Program (SSBG).</td>
</tr>
<tr>
<td>ADA</td>
<td>&quot;Americans with Disabilities Act of 1990&quot; is a federal civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public.</td>
</tr>
<tr>
<td>CAA</td>
<td>&quot;Community Action Agencies&quot; are tax-exempt, nonprofit corporations or public entities funded by the federal CSBG via subgrants they receive from a state department designated by the state’s governor to facilitate the funding. To receive CSBG funding, an organization must maintain a specified board composition and be capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency.</td>
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<tr>
<td>CAP</td>
<td>Another term for CAA. The Economic Opportunity Act of 1964 authorized the creation of and funding for the nationwide Community Action Program, which was composed of local Community Action Programs (CAPs) across the country. The Economic Opportunity Act also referred to the local CAPs as CAAs.</td>
</tr>
<tr>
<td>CAPLAW</td>
<td>&quot;Community Action Program Legal Services&quot; a tax-exempt, nonprofit membership corporation dedicated to providing the legal, governance, and management resources necessary to sustain and strength the national CAA network.</td>
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<tr>
<td>CCDBG</td>
<td>&quot;Child Care and Development Block Grant,&quot; created by the Child Care and Development Block Grant Act, authorizes the Child Care and Development Fund (CCDF), which is a federal and state partnership program that provides financial assistance to low-income families to access child care so they can work or attend a job training or educational program. States also use the CCDF to build the skills and qualifications of the teacher workforce, support childcare programs to achieve higher standards, and provide consumer education to help parents select childcare that meets their families’ needs.</td>
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<tr>
<td>Abbreviation</td>
<td>Description</td>
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<tr>
<td>CDBG</td>
<td>“Community Development Block Grant” program aims to ensure decent affordable housing, to provide services to the most vulnerable communities, and to create jobs through the expansion and retention of businesses. CDBG is one of the longest-running programs administered by the Federal Department of Housing and Urban Development (HUD).</td>
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<tr>
<td>CFR</td>
<td>“Code of Federal Regulations” is the codification of rules of the executive departments and agencies of the federal government.</td>
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<tr>
<td>CNCS</td>
<td>“Corporation for National and Community Service” is a federal agency that focuses on improving the lives of the American people through programs that foster volunteer opportunities and service by fellow Americans. CNCS administers multiple federal programs such as AmeriCorps, Senior Corps, the Social Innovation Fund and the Volunteer Fund.</td>
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<tr>
<td>COI</td>
<td>“Conflict of Interest” is a situation in which there is a personal or financial interest that compromises or could compromise a person’s independence of judgment in exercising his or her responsibilities.</td>
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<tr>
<td>CSBG</td>
<td>“Community Services Block Grant” is a federal block grant administered by Office of Community Services (OCS) located within ACF in HHS. CSBG funds the operations of a state-administered network of tax-exempt nonprofit corporations and public entities designated as CAA to alleviate the causes and conditions of poverty in communities. CSBG funding supports projects that provide services and activities addressing employment, education, better use of available income, housing, nutrition, emergency services and/or health.</td>
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<tr>
<td>CFDA</td>
<td>“Catalog of Federal Domestic Assistance” is the title of the program under which the Federal award was funded.</td>
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<tr>
<td>DOE</td>
<td>“U.S. Department of Energy” is a federal agency that addresses energy, environmental and nuclear challenges through transformative science and technology solutions. DOE administers several federal grant programs, including the Weatherization Assistance Program (WAP).</td>
</tr>
<tr>
<td>DOJ</td>
<td>“U.S. Department of Justice” is a federal agency that enforces laws and defends the interests of the United States. DOJ administers several federal grant programs through the Office of Justice Programs (OJP), Office for Victims of Crimes (OVC), Office of</td>
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Juvenile Justice and Delinquency Prevention, and the Office on Violence Against Women.

| DOL | “U.S. Department of Labor” is a federal agency responsible for enforcing a variety of federal labor and employment laws such as the Family Medical Leave Act (FMLA), Fair Labor Standards Act (FLSA), Davis-Bacon Act, and Occupational Safety and Health Act. DOL also administers several grant programs including the Workforce Innovation and Opportunity Act (WIOA) programs in collaboration with the U.S. Departments of Education and HHS. |

| ECLKC | “Early Childhood Learning and Knowledge Center” offers T&TA resources for the Head Start program from the federal Office of Head Start (OHS). |

| EEOC | “U.S. Equal Employment Opportunity Commission” is the federal agency responsible for enforcing federal laws that make it illegal to discriminate against a job applicant or an employee because of the person’s race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information. |

| EOA | “Economic Opportunity Act of 1964” initially authorized the federal funding of CAAs as a part of Lyndon Johnson’s War on Poverty. The Act was repealed in 1981 and replaced by the federal CSBG Act. |

| FLSA | “Fair Labor Standards Act” is a federal statute that establishes minimum wage, overtime pay, recordkeeping, and child labor standards for full- and part-time workers in the private and public sectors. |

| FMLA | “Family and Medical Leave Act” is a federal law requiring covered employers to provide eligible employees with job-protected, unpaid leave for qualified medical and family reasons. |
### H

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<tr>
<th><strong>HHS</strong></th>
<th>“U. S. Department of Health and Human Services” is federal agency that administers programs aimed at protecting the health of all Americans and providing essential human services through grant programs such as the CSBG, Head Start, and LIHEAP.</th>
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<tr>
<th><strong>HUD</strong></th>
<th>“U.S. Department of Housing and Urban Development” is a federal agency that administers programs aimed at creating strong, sustainable, inclusive communities and quality affordable homes, such as CDBG and the HOME Investment Partnerships Program which funds Community Housing Development Organizations.</th>
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<tr>
<th><strong>IRS</strong></th>
<th>“Internal Revenue Service” is a bureau of the U. S. Department of the Treasury that administers and supervises the execution and application of federal tax laws.</th>
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<tr>
<th><strong>LIHEAP</strong></th>
<th>“Low-Income Home Energy Assistance Program” is a federal block grant program administered by the federal OCS. LIHEAP assists eligible low-income households with heating and cooling energy costs, bill payment assistance, energy crisis assistance, weatherization and energy-related home repairs.</th>
</tr>
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### N

<p>| <strong>NASCSP</strong> | “National Association for State Community Services Programs” is a national membership association that advocates and enhances the leadership role of states in preventing and reducing poverty through its publications and training. NASCSP members mainly consist of state offices that facilitate CSBG and Weatherization Assistance Program (WAP) funding. NASCSP’s vision encompasses the empowerment of low-income families to reach self-sufficiency in its broadest context, through helping states attain full utilization of their resources and implement an extensive array of services to these families, including  |</p>
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<tr>
<td><strong>OHIO CSBG POLICIES AND PROCEDURES MANUAL</strong></td>
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<td></td>
<td>weatherization, energy assistance, child care, nutrition, employment, state energy programs, job training, and housing in urban, suburban and rural communities.</td>
</tr>
<tr>
<td>NCAF</td>
<td>“National Community Action Foundation” is a non-profit organization that represents the funding and policy interests of CAAs before Congress and the federal Executive Branch. NCAF is funded solely by private contributions.</td>
</tr>
<tr>
<td>OCS</td>
<td>“Office of Community Services” is located within ACF in HHS. OCS administers a number of social service and community development federal grant programs, including the CSBG, LIHEAP, and the SSBG.</td>
</tr>
<tr>
<td>OHS</td>
<td>“Office of Head Start” is located within ACF in HHS. OHS administers funding authorized by the Head Start Act, oversee entities that provide Head Start services, issues federal policy direction, and provides a T&amp;TA system to assist Head Start recipients in providing comprehensive services to eligible young children and their families. Head Start funding is used to support preschool programs, which primarily serve 3- and 4-year old children, and Early Head Start programs for infants, toddlers, and pregnant women.</td>
</tr>
<tr>
<td>OSHA</td>
<td>“Occupational Safety and Health Administration” is overseen by DOL and aims to assure safe and healthful working conditions for working people by setting and enforcing health and safety standards and by providing training, outreach, education and assistance.</td>
</tr>
<tr>
<td>OJP</td>
<td>“Office of Justice Programs” is within DOJ and provides innovative leadership to federal, state, local, and tribal justice systems, by disseminating state-of-the-art knowledge and practices across America, and providing federal grants for the implementation of these crime fighting strategies.</td>
</tr>
<tr>
<td>OMB</td>
<td>“Office of Management and Budget” is a federal Executive Office that oversees the performance of federal agencies and administers the federal budget. In particular, OMB establishes government-wide grant management policies and guidelines which are typically adopted by each federal agency via regulations issued by that agency. In 2013, OMB finalized its comprehensive overhaul of federal grant administrative, cost accounting and audit policies guidance, titled the <em>Uniform Administrative Requires, Cost Principles and Audit Requirements for Federal Awards</em>.</td>
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<td>OVC</td>
<td>“Office for Victims of Crime” is within DOJ and administers the Crime Victims Fund which is financed by fines and penalties paid by convicted federal offenders, not from tax dollars. OVC channels funding for victim compensation and assistance throughout the United States, raises awareness about victims’ issues, promotes compliance with victims’ rights</td>
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laws, and provides T&TA and publications and products to victim assistance professionals.

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<td><strong>Partnership</strong></td>
<td>“National Community Action Partnership” is a national, tax-exempt, nonprofit membership corporation that provides technical assistance, training and other resources to the Community Action network. The resources provided by the Partnership enable the Community Action network to stay up-to-date on the latest best practices to fight poverty and empower low-income individuals and families to achieve self-sufficiency.</td>
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<td><strong>ROMA</strong></td>
<td>“Results Oriented Management and Accountability” is a performance-based initiative designed to preserve the anti-poverty focus of community action and to promote greater effectiveness among state and local agencies receiving CSBG funds.</td>
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<td><strong>SNAP</strong></td>
<td>“Supplemental Nutrition Assistance Programs” (formerly the Food Stamp Program) is a Food Nutrition Services (FNS) program administered by the U.S. Department of Agriculture (USDA). Working with state agencies, nutrition educators, and neighborhood and faith-based organizations, SNAP puts healthy food within reach for 28 million people each month via an electronic benefits transfer card used to purchase food at most grocery stores. Through nutrition education partners, SNAP helps customers learn to make healthy eating and active lifestyle choices.</td>
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<td><strong>SSVF</strong></td>
<td>“Supportive Services for Veteran Families” is a federal grant program administered by the U.S. Department of Veterans Affairs that provides funding to nonprofit organizations and consumer cooperatives who can provide supportive services to low-income Veteran families living in transition to permanent housing.</td>
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### T

**TANF**

“Temporary Assistance for Needy Families” is a federal block grant administered by OCS located within ACF in HHS. TANF is designed to help needy families achieve self-sufficiency by providing block grants to states to design and operate programs that accomplish one of the following four purposes of the TANF program to: provide assistance to needy families so that children can be cared for in their own homes; reduce the dependency of needy parents by promoting job preparation, work, and marriage; prevent and reduce the incidence of out-of-wedlock pregnancies; and encourage the formation and maintenance of two-parent families.

**T&TA**

“Training and Technical Assistance” is the planning, development, delivery, and evaluation of resources and activities designed to achieve specific learning objectives, resolve problems, and foster the application of innovative approaches.

### U

**UGG or UG**

“Uniform Grant Guidance” or “Uniform Guidance” is OMB’s comprehensive grant guidance titled the Uniform Administrative Requires, Cost Principles and Audit Requirements for Federal Awards that establishes a government-wide grants management framework. The UG is generally codified at 2 C.F.R. Part 200 and has been adopted by all federal agencies. HHS is the one federal agency that recodified the UG in its entirety at 45 C.F.R. Part 75. The UG is intended to ease administrative burden and strengthen oversight over federal funds. In particular, the UG addresses topics relating to protecting and using federal funds such as procurement, property standards, financial management, monitoring, allowable costs (i.e., costs which may be paid for with federal funds) and audit requirements.

**USDA**

“U.S. Department of Agriculture” is a federal agency that provides leadership on food, agriculture, natural resources, rural development, nutrition, and related issues based on public policy, the best available science, and effective management.

**USC**

“United States Code” is the official compilation and codification of federal statutes.
| WAP | “Weatherization Assistance Program” is a federal grant program administered by the DOE and aims to reduce energy costs for low-income households by increasing the energy efficiency of their homes, while ensuring their health and safety. |
| WIC | “The Special Supplemental Nutrition Program for Women, Infants and Children” is a FNS program administered by the USDA. WIC provides federal grants to states for supplemental foods, health care referrals, and nutrition education for low-income pregnant, breastfeeding, and non-breastfeeding postpartum women, and to infants and children up to age five who are found to be at nutritional risk. |
| WIOA | “Workforce Innovation and Opportunity Act” establishes a publicly funded workforce system, administered by DOL in collaboration with the U.S. Departments of Education and HHS. WIOA aims to align workforce development, education, and economic development programs with regional economic development strategies to meet the needs of local and regional employers. |