

POLICY AND PROCEDURES MANUAL

FOR WISCONSIN'S CSBG CONTRACT AGENCIES

Administered by

DIVISION OF FAMILY AND ECONOMIC SECURITY

BUREAU OF WORKING FAMILIES

Wisconsin Department of Children and Families

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SECTION 1: Background

The Community Services Block Grant (CSBG) provides federal funds to states, territories, and tribes to support services that alleviate the causes and conditions of poverty in under resourced communities. Tribes, territories, and over 1,000 local Community Action Agencies (CAAs) provide CSBG-funded services and activities including housing, nutrition, utility, and transportation assistance; employment, education, and other income and asset building services; crisis and emergency services; and community asset building initiatives, among other things. Over nine million individuals are served by CSBG-funded programs annually.

CSBG funding is provided by the U.S. Department of Health and Human Services, Office of the Administration for Children and Families, Office of Community Services (OCS) for the "Community Action Program." The Community Action Program was founded in 1964 by the Economic Opportunity Act, part of President Lyndon B. Johnson's War on Poverty. Originally, federal Community Action Program funds flowed directly to local public and private CAAs. In 1981 CSBG was created by the federal Omnibus Budget Reconciliation Act, and direct federal funding to local agencies was replaced with state-administered block grants.

1.1 Authority

- The CSBG Act, which constitutes Section II of the federal Community Opportunities, Accountability, and Training and Educational Services Act of 1998, also known as the Coats Act, is the most recent federal reauthorization of the CSBG program. The CSBG Act is available online at: https://www.govtrack.us/congress/bills/105/s2206/text.
- In accordance with Section 676(a) of the CSBG Act, the Governor of Wisconsin has designated the Wisconsin Department of Children and Families (DCF) as the lead agency for administering the state's CSBG funds.
- Wis. Stat. ss. 49.265(1) - 49.265(6) define the state's regulations for CSBG funds. The statutes are available online at: https://docs.legis.wisconsin.gov/statutes/statutes/49/III/265.

1.2 Purpose of this Manual

In order to clarify the federal and state requirements for CSBG and encourage the efficient use and management of these funds, DCF issues policies and procedures which are applicable to all recipient grantees funded through CSBG (herein generally referred to as "contract agencies" but often referred to as CAAs, CAP Agencies, and CSBG eligible entity on the national level) . This manual has three distinct purposes:

- To give an overview of CSBG funding and its administration contract agencies;
- To provide guidance to contract agencies to assist in developing policies and procedures appropriate to their specific programs; and
- To provide guidance on the three elements that govern program oversight in Wisconsin: state statutes, contract, federal standards, and other requirements applied to the program.

1.3 Feedback and Revisions

These policies and procedures may be amended and updated as necessary. The most current version of this manual will be available online at https://dcf.wisconsin.gov/csbg.

DCF welcomes feedback on this manual and any of the policies and procedures contained herein. Any feedback, or to make a revision request, should be sent in writing to DCF.CSBG@wisconsin.gov. This manual is reviewed and updated (if applicable) as part of Wisconsin's CSBG State Plan process every two years. More information can be found in Section 5.2.

SECTION 2: Acronym Guide & Resource Links

ACSI	American Customer Satisfaction Index
CAA	Community Action Agency (also referred to as a CAP agency, a CSBG eligible entity, or as herein, a contract agency)
CAP	Corrective Action Plan, Community Action Plan
CNA	Community Needs Assessment
CRC	Civil Rights Compliance
CSBG	Community Services Block Grant
CSBG Mailbox	DCF.CSBG@wisconsin.gov (for all communications regarding CSBG contracts)
DCF	Wisconsin Department of Children and Families
DCL	Dear Colleague Letter
DWD	Department of Workforce Development
FPL	Federal Poverty Level
HHS	U.S. Department of Health and Human Services
HIPAA	Health Insurance Portability and Accountability Act
IM	Information Memorandum
LOA	Letter of Assurance
LPA	Limited Purpose Agency (also referred to as a "statewide agency" or "single purpose agency" in Wisconsin)
NCAP	The National Community Action Partnership
NASCSP	National Association for State Community Services Programs
NPI	National Performance Indicator
OCS	Office of Community Services
OMB	Office of Management and Budget
OLDC	Online Data Collection system
QIP	Quality Improvement Plan
ROMA	Results Oriented Management and Accountability
SPARC	Systems for Payments and Report of Contracts
TAP	Technical Assistance Plan
T/TA	Training and Technical Assistance
UMOS	United Migrant Opportunity Services
WAP	Weatherization Assistance Program
WISCAP	Wisconsin Community Action Program Association

Note on terminology used: references to "CAA", "contract agency", and "CSBG eligible entity" herein all refer to the Wisconsin agencies that are defined in statute as eligible for CSBG funding and contract with DCF for these funds. These agencies do not change, and CSBG is not "open" for applications. A full list of Wisconsin's CAAs is available on WISCAP's website here and is also included in most current version of the CSBG State Plan, available on DCF's website here.

SECTION 3: CSBG Purpose and Performance Management Framework

3.1 Purpose of CSBG Funding

The purpose of CSBG is to provide assistance to states and local communities, working through a network of CAAs and other neighborhood-based organizations, for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient.

Reference: Section 672 of the CSBG Act

3.2 National CSBG Goals

The national CSBG network - comprised of CSBG eligible entities, CSBG state offices (DCF),state associations (WISCAP), national partners, and other stakeholders - has three main goals:



Reference: CSBG DCL August 18, 2017 – Update on CSBG Performance Management

3.3 ROMA, CSBG Organizational Standards, and the New Performance Management Framework

In 2015, OCS and the CSBG network collaborated to create a new performance management framework using a continuous improvement model. This framework, which includes Results Oriented Management and Accountability (ROMA) and the CSBG Organizational Standards, includes elements that are designed to increase accountability across all three levels of the network (federal, state, and local). The ROMA methodology involves practice of a data driven cycle: assessment, planning, implementation, achievement of results, evaluation, and re-assessment, etc. ROMA is required to be integrated into contract agency management and administrative processes from conducting a needs assessment, implementing agency-wide strategic planning, strategic service delivery, and the reporting and analysis of data. Outcomes and results are used by contract agency boards and staff to determine overall

effectiveness of programs, inform annual and long-term planning, and to support agency advocacy, funding, and community partnership activities.

Reference: OCS IM #138 *State Establishment of Organizational Standards for CSBG Eligible Entities,* OCS IM #144 *State and Federal Accountability Measures and Data Collection Modernization,* OCS IM #152 *Annual Report*

3.4 Continuous Improvement Model for CSBG Administration

The American Customer Satisfaction Index (ACSI) survey is a biannual survey administered to contract agencies and WISCAP to measure DCF's effectiveness in meeting CSBG Act requirements, including development of the State Plan, distribution of funds, use of discretionary funds, training and technical assistance (T/TA), monitoring and corrective action, linkages, and overall satisfaction of grantees with their partnership with the state office.

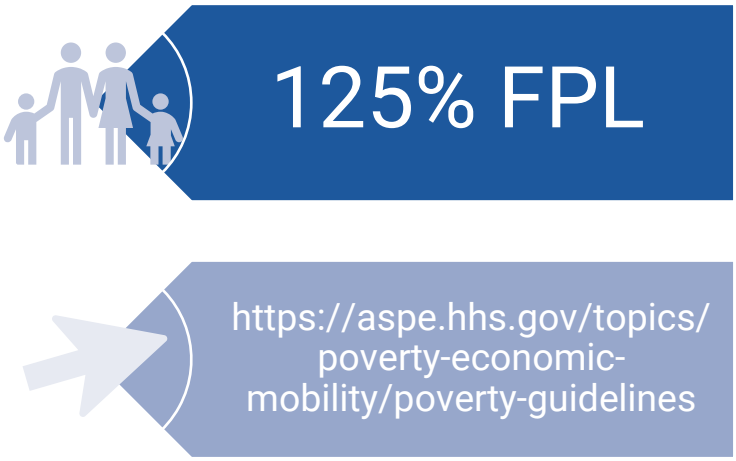
DCF will share ACSI results with the grantees and the Wisconsin Community Action Program Association (WISCAP) and will use ACSI survey results to improve its performance and quality of its partnership, T/TA in each of the areas. We appreciate grantee feedback so we can be a better partner. Results are aggregated and no individual grantee's remarks or scores are identified when results are published.

DCF also invites feedback during roundtables hosted by WISCAP, during the state planning process, and through occasional surveys. Feedback from these sources and ACSI survey results are reviewed and considered for changes to this manual and our CSBG State Plan. This manual is reviewed and updated (if applicable) as part of Wisconsin's CSBG State Plan process, every two years.

3.5 Eligibility Criteria

Income Eligibility

In accordance with both the CSBG Act and state statute, individuals and families receiving CSBG-supported services must have incomes at or below 125% of the poverty guideline, also referred to as the federal poverty level (FPL), updated periodically in the Federal Register by the U.S. Department of Health and Human Services (HHS) under the authority of 42 U.S.C. 9902(2). In the event income eligibility is redefined at the federal level, a reconciliation between this policy manual and state statutes will have to be made. DCF will issue communications on these issues as they arise. Current and prior poverty guidelines are available on the HHS website.



TIP: *current poverty guidelines posted by HHS are considered "100%" FPL. To determine CSBG eligibility at 125% FPL, multiply the poverty guideline by 1.25. The individual or family is CSBG eligible if his/her/their income is at or below that number.*

Contract agencies and any of their sub-recipients are required to conduct eligibility screenings as part of their client intake process. Agencies must have their own written policies and procedures for each program they administer that uses CSBG funds to ensure CSBG funds are only used to support individuals and families who meet the income eligibility requirement. Agencies may determine the types of documentation they require for income verification. If a household's income is at or below 125% FPL upon intake into the program, the individual (or household) is eligible to continue receiving services in accordance with the agency's program policies, until the agency conducts a formal reassessment.

Reference: Section 673(2) of the CSBG Act, HHS Office of the Assistant Secretary for Planning and Evaluation, *and* Wis. Stat. s. 49.265(1)(b)

> **A household** is defined as all individuals living within the same household who are related to one another by birth or marriage, any adult custodial parent, all dependent children with respect to whom the individual is a legal custodial parent and all minor children with respect to whom the adult individual's dependent child is a custodial parent. A household includes any non-marital co-parent or any spouse of the individual who resides in the same household as the individual and any minor children with respect to whom the spouse or non-marital co-parent is a custodial parent. The gross (pre-tax) income of all individuals in the household must be counted in order to assess eligibility for CSBG-funded services.

Other Eligibility Criteria

Agencies may set other eligibility criteria for programs supported by CSBG funds, including non-income related eligibility criteria. For example, a program may only serve homeless families with minor children, or an agency may choose to set an income eligibility limit for a specific program at lower than 125% FPL. However, agencies may not discriminate on the basis of race, color, national origin, sex, age, religion, or disability. In addition, agencies cannot ban non-citizens from CSBG programs solely on the basis of their immigration status unless such exclusion is authorized by another statute.

Reference: OCS IM #30

3.6 Allowable Activities

CSBG funds can be used for a wide variety of services designated to assist low-income families and individuals, including homeless households, refugees, migrant or seasonal farmworkers, and elderly low-income individuals and families.

CSBG-funded services for families and individuals can include assistance to:

- Secure and retain meaningful employment;
- Attain an adequate education;
- Make better use of available income;
- Secure needed transportation;
- Obtain and maintain adequate housing and a suitable living environment;
- Obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs;
- Remove obstacles and solve problems that block self-sufficiency;

- Achieve greater participation in the affairs of the community, 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; and
- Make more effective use of other programs that can help low-income families and individuals meet their basic needs and achieve greater self-sufficiency.

Contract agencies may also use CSBG funds to:

- Address the needs of youth in low-income communities through youth development programs and after-school child care programs;
- Research the causes of and problems created by poverty in the community;
- Determine if programs to reduce poverty are working effectively;
- Coordinate and establish linkages between governmental and other social services programs to eliminate duplication of services and ensure the effective delivery of services to low-income individuals;
- Create methods by which persons experiencing poverty can work with private groups to solve common problems;
- Apply for funds from various sources to support a community action program; and
- Encourage the use of private sector resources in efforts to alleviate poverty in the community.

Agencies will determine the specific assistance and programs they will provide in their CSBG Application, based on the findings of their Community Needs Assessment (CNA).

For further guidance on allowable costs for DCF contractors, contract agencies should review the DCF Allowable Cost Policy Manual located on the Doing Business with DCF page of DCF's website. For further guidance on allowable uses for federal grants, which include CSBG funds, agencies should refer to OMB Part 200—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Subpart E—Cost Principles.

Reference: Section 676(b)(1) of the CSBG Act*,* Wis. Stat. s. 49.265(3)(b)*, and the Wisconsin* CSBG State Plan

3.7 Direct Services

Wis. Stat. s. 49.265(3)(b) and the Wisconsin CSBG State Plan allow contract agencies to provide direct services to low-income individuals through emergency assistance services, grants, loans, or emergency supplies to meet immediate and urgent needs. In addition, Section 678F of the CSBG Act allows low-cost residential weatherization and other energy-related home repairs.

If CSBG funds are used to provide weatherization services, food/gas cards, bill pay assistance, mortgage or property tax assistance, or other direct services of any type, the households receiving the services must be at or below 125% FPL. Such services must be included in the agency's CSBG application and approved by DCF, and each agency should have its own internal policies for direct services, to include the eligibility screening process, frequency and amount limitations of services received. Internal policies for direct services programs will be provided to DCF upon request.

3.8 Unallowable Activities

Per Section 678F of the CSBG Act, the following uses of CSBG funds are **not allowable**:

- The purchase or improvement of land or the purchase, construction or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or facility.
    - Note: Assistance with a delinquent mortgage or property tax payment is allowable. A permanent improvement to a home, such as installing a different furnace system or

making a change to the inside or outside structure of a home, is not allowed. Agencies are encouraged to contact the CSBG contract manager if they are uncertain whether a specific service is allowable;

- As a match requirement for another grant, other than:
  - AmeriCorps and McKinney-Vento Homeless Assistance Act programs (reference: OCS IM #135); and
  - McKinney-Vento Homeless Assistance Act programs (reference: OCS IM #139);
- Leasing of space, buildings, and/or other assets not associated with one of the three CSBG national goals or allowable activity; and
- Political activity such as:
  - Any partisan or nonpartisan activity or any political activity associated with a candidate or contending faction or group, in an election for public or party office,
  - Any activities to provide voters and prospective voters with transportation to the poll or provide similar assistance in connection with an election, or
  - Any voter registration activity.

3.9 Direct Program and Administrative Costs

Direct program costs are those that can be specifically identified with the delivery of a particular program or service that serves low-income individuals and families. Direct program costs are incurred for the service delivery and management components within a particular program or project. Therefore, direct costs include expenditures on some activities with administrative qualities, including salaries and benefits of program staff and managers, equipment, training, conferences, travel, and contracts, as long as those expenses relate specifically to a particular program or activity, not to the general administration of the organization.

Administrative costs are equivalent to the familiar concepts of indirect costs or "overhead." As distinguished from program administration or management expenditures that qualify as direct program costs, administrative costs refer to central executive functions that do not directly support a specific project or service. Administrative costs relate to the general management of the contract agency, such as strategic direction, board development, executive director functions, accounting, budgeting, personnel, procurement, and legal services.

Each contract agency's administrative costs are reviewed and approved on a case-by-case basis as part of the CSBG application and budget modification processes outlined in Section 6. All administrative costs charged to CSBG must be necessary to accomplish at least one of the three national CSBG goals. Although the CSBG Act does not establish a maximum percent of agency administration that can be charged to CSBG, OCS and OMB have established a national goal of limiting CSBG administrative expenses to no more than 16%. DCF requires a written explanation for any administration costs above 15% and will work with contract agencies that are not meeting the 16% goal on strategies for reducing administrative costs.

Reference: OCS Information Memorandum 37

SECTION 4: Eligibility to Receive CSBG Funding

4.1 Eligible Entities

The federal CSBG Act designates the following types of agencies as eligible for receiving CSBG funds:

Community Action Agencies (CAAs): CAAs are local, private and public nonprofit organizations that carry out the Community Action Program. There are over 1,000 CAAs in the United States and its territories. Wisconsin has 16 CAAs, each of which serves a specific geographic area of one to ten counties.

Organizations Serving Migrant Farmworkers: In Wisconsin, United Migrant Opportunity Services (UMOS) has been designated as an eligible entity to receive CSBG funds to serve migrant farmworkers.

Limited Purpose Agencies (LPAs): Wis. Stat. s. 49.265 allows Limited Purpose Agencies (LPAs) to receive CSBG funds. LPAs are statewide nonprofit organizations serving specific populations that are governed by boards of directors that must be comprised of at least 50% low-income individuals or persons who can effectively represent the needs and interests of low-income citizens. In Wisconsin, Foundation for Rural Housing has been designated as an eligible entity to serve a specific population statewide.

Wis. Stat. s. 49.265 stipulates that along with the secretary of the department serving as the CSBG lead agency, the legislative body of the county (i.e., county board of supervisors) if the agency serves an entire county, or if the agency serves a city, village, or town, the legislative body of the city, village, or town, must also grant approval in order for the agency to be eligible to receive CSBG funds.

The list of eligible entities within the state is generally consistent from year to year. States may only add or remove organizations from the list of eligible entities according to procedures outlined by the CSBG Act and as described in Section 4.3.

4.2 Tripartite Board Requirements

A major defining characteristic of CSBG eligible entities is that persons affected by poverty have meaningful roles in guiding the agencies' programs and approach to improving the lives of low-income individuals and families. This is exhibited through the tripartite board.

Each contract agency **must** be governed by a tripartite board of directors (federal requirement) with 15 to 51 members (state statute) in the following three categories:

1/3	**Elected public officials**	Or an elected official's representative or appointee.
1/3	**Low-income representatives**	Must be chosen in accordance with democratic selection procedures adequate to ensure that they are selected by, and represent, low-income persons.
1/3	**Community members**	Groups or interests within the communities served by the agency. They may represent private industry, labor, religious, human services, law enforcement, education, or other major groups or interests.



Reference: Section 676B of the CSBG Act, Wis. Stat. s. 49.625(2)(a) and OCS Information Memorandum 82

The Role of the Board of Directors

Boards are responsible for oversight and governance of their agencies. They provide direct supervision of the agency's executive director only. The governing board of each contract agency shall undertake an annual performance evaluation of the agency's

executive director. The board must also review and approve the executive director's compensation within each calendar year. Dated evidence of the performance evaluation and compensation approval must be contained within the executive director's personnel file and recorded in the agency's board meeting minutes.

In accordance with ROMA (see: Section 3.3), boards are key in the development, planning, implementation, and evaluation of an agency's programs.

Board members, especially those who represent low-income communities, are not excluded from receiving services from the agency as long as they do not receive preferential treatment in the nature or timing of such services, and the agency follows its conflict-of-interest policies.

Reference: Section 676B of the CSBG Act OCS Information Memorandum 82*, and* OCS Information Memorandum 138

Bylaws

All contract agencies must have written bylaws that are reviewed and approved by the agency's board of directors and an attorney at least once every five years. The bylaws must define the tripartite composition of the board and specific procedures for the democratic selection of low-income representatives. The bylaws of the LPAs must stipulate at least 50% of board seats will be held by low-income individuals or persons who can effectively represent the needs and interests of low-income citizens.

The bylaws of all contract agencies must define the following:

- Responsibilities of the board;
- Board committees and the authority of the committees;
- Officers and their duties;
- Procedures for recruiting and seating new board members;
- Meeting frequency;
- Board quorum;
- Number of board members;
- Procedures for removing board members for nonattendance; and
- Procedures for filling vacancies on the board.

Reference: OCS Information Memorandum 138

Procedure to Petition for Representation

Contract agencies must have a written process in their board bylaws, policy, or procedure manual through which low-income individuals or any community and religious organization can petition for representation on the agency's board of directors.

Reference: Section 676(b)(10) of the CSBG Act

Board Term Limits

Federal and state CSBG statutes do not require term limits for contract agencies' board members; therefore, agencies are free to choose whether or not their bylaws impose term limits for board members.

Board Meetings and Minutes

Board meetings must be scheduled and held in accordance with the agency's bylaws. Likewise, board attendance requirements must be outlined and followed in accordance with the agency's bylaws.

All contract agencies must keep electronic copies of board meeting minutes. Minutes may be used for monitoring and annual Organizational Standards documentation review. Contract agencies must send all

board meeting minutes, whether the minutes have been formally approved or not, to DCF.CSBG@Wisconsin.gov within 45 days of the meeting date.

Board Vacancies

DCF considers the board roster provided with an agency's CSBG application as the roster of record. Changes to this roster require the agency to complete a DCF Board Roster Form. DCF expects board vacancies to be filled within 90 days. If any low-income vacancies cannot be filled within 90 days, the agency must notify DCF in writing and provide a plan and timeline for filling the position, subject to approval by DCF.

Board Training and ROMA Requirements

Board members must receive training about the legal aspects of their service and their duties and responsibilities at least every two years. New board members must receive structured orientation training within six months of being seated.

Boards must also receive training on ROMA. All board members must be familiar with ROMA concepts and participate in periodic updates and review of the agency's Community Action Plan, as described in Section 6.4, which uses ROMA as the basis of setting and tracking performance goals for the agency's programs and services. WISCAP produced a ROMA video specifically for the purpose of training board members, which satisfies the requirements of this section when viewed by an agency's board members. The video is available online at https://www.youtube.com/watch?v=ph2pCwfu5z8 or by contacting WISCAP.

Reference: OCS Information Memorandum 82 *and* OCS Information Memorandum 138

4.3 Designation and Redesignation of Eligible Entities in Unserved Areas

In accordance with the CSBG Act, if a county in Wisconsin is not covered or ceases to be covered by an eligible entity, and the State decides to serve that county, the State will follow its designation or redesignation process, as applicable and as described in the current version of Wisconsin's CSBG State Plan.

In alignment with OCS Information Memorandum 116, if no private nonprofit organization is identified or determined to be qualified as an eligible entity to serve the area, DCF may designate an appropriate political subdivision of the State to serve as an eligible entity for the area. Any nonprofit or public agency receiving CSBG funds must meet the tripartite board requirements specified in Section 676B of the CSBG Act.

Reference: Section 676A of the CSBG Act *and the Wisconsin* CSBG State Plan

SECTION 5: State Plan and Grant Distribution

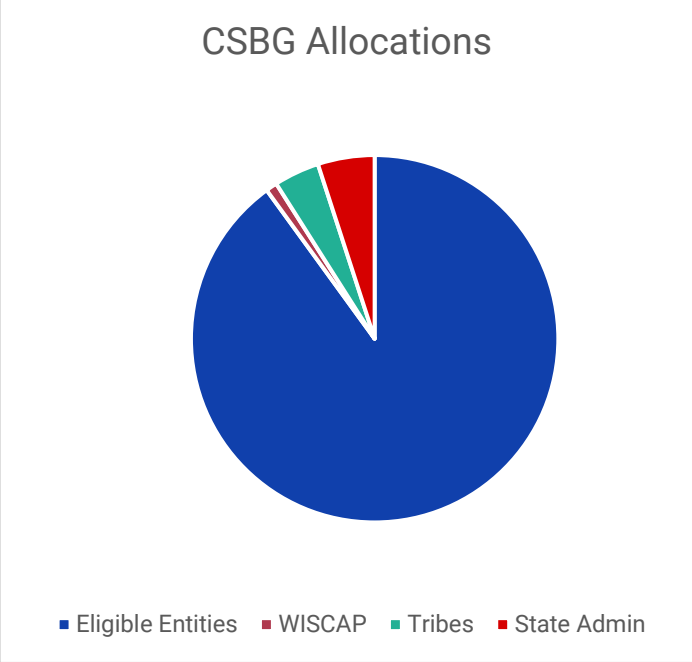
5.1 Grant Formula and Distribution to Contract Agencies

Federal law requires that DCF pass through 90% of Wisconsin's CSBG allocation in grants to eligible entities. The State may use no more than 5% of the allocation for the State's administrative expenses. The remaining 5% is used at the State's discretion to support other activities consistent with the purposes of CSBG legislation.

Wisconsin's CSBG allocation methodology:

- **90%** goes to Wisconsin's eligible entities:

- **84.77%** to the 16 CAAs. The specific grant amounts to the agencies are determined by the formula: the ratio of the number of persons at or below 100% of poverty in the counties within the CAA's service area (from U.S. Census data) multiplied by 87.47% of Wisconsin's total CSBG allocation.
- **3.88%** is passed through to UMOS for services for migrant and seasonal farmworkers.
- **1.36%** is distributed to the Foundation for Rural Housing, which provides housing assistance for low-income households in all counties in Wisconsin except Dane, Milwaukee, and Racine Counties.



- **4%** is discretionary CSBG funding allocated to Wisconsin's 11 federally recognized Indian tribes.
- **1%** is discretionary CSBG funding allocated to WISCAP for networking, training, and technical assistance.
- **5%** is used as administrative dollars within DCF for the purposes of administering the program statewide, and to provide training and technical assistance for CSBG-funded agencies through a contract with the Wisconsin Community Action Program Association (WISCAP).

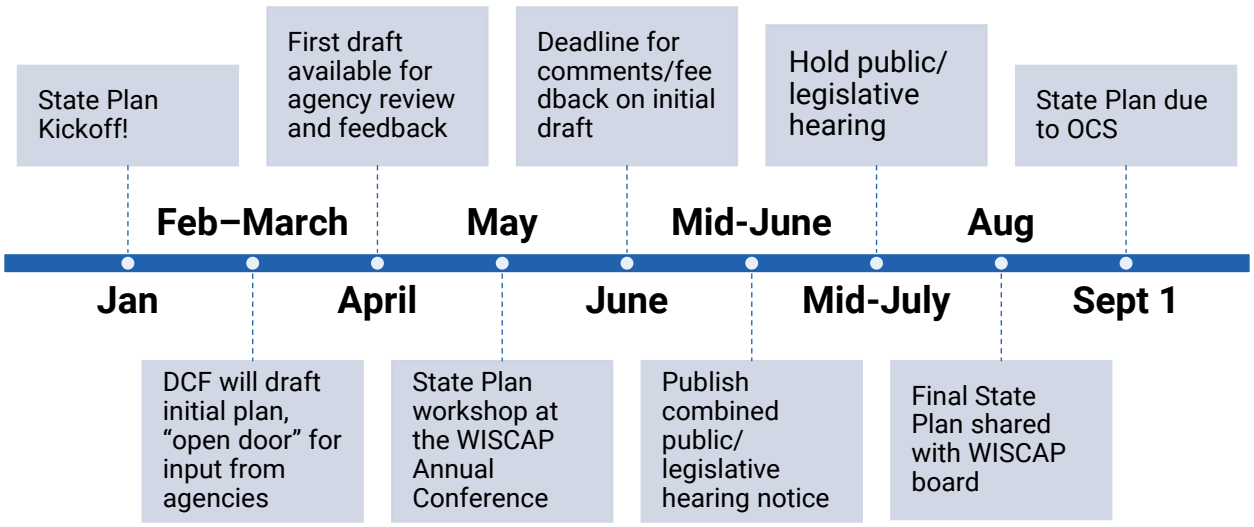
Reference: Section 675C(a)(1) of the CSBG Act *and Wisconsin* CSBG State Plan

5.2 CSBG State Plan

The CSBG Act requires Wisconsin to submit a CSBG State Plan to OCS for each grant award period to describe Wisconsin's proposed use of CSBG funds and include assurances that CSBG will be used in accordance with legislative intent. DCF develops and submits a CSBG State Plan every two years by September 1. DCF solicits public comments during the process of developing each CSBG State Plan, including working collaboratively with contract agencies, WISCAP, and other stakeholders in the drafting and revision process. DCF also reviews and updates this manual as part of this process. DCF holds a combined public and legislative hearing on the CSBG State Plan. At least ten days in advance, notice of the hearing and draft of the plan are sent electronically to contract agencies and other stakeholders, and posted publicly on the DCF website, with the Wisconsin State Journal, and on https://publicmeetings.wi.gov/.

The purpose of the hearing is to gain public input and provide a review of CSBG programming and plans. Revisions to the CSBG State Plan may be made in response to written and verbal public comments.

Example Timeline for State Plan Development



SECTION 6: Contract Process and Procedures

6.1 CSBG Funding Cycle and Contract Year

The federal funding cycle for CSBG state allocations follows the federal fiscal year (October 1 through September 30). The contract year for Wisconsin's CSBG program is January 1 through December 31.

If federal allocations are delayed, DCF's policy is to issue contracts with estimated grant amounts and amend contracts after the start of the contract year when Wisconsin's federal CSBG allocation is determined.

6.2 CSBG Application

All contract agencies must submit an annual application to DCF that outlines their plans for use of the CSBG funds and includes signed certifications that the agencies will comply with all federal and state requirements for CSBG grantees. DCF will send CSBG application forms to eligible entities and completed applications will be due back to DCF by October 1 in the year preceding the contract year, which begins on January 1. DCF will review and approve the applications prior to issuing contracts.

The applications must include the following information:

- The contract agency's annual Community Action Plan as described in Section 6.4;
- A proposed CSBG budget that details planned programmatic and administrative expenditures for the upcoming year;
- A roster of board members that includes their names, city/town of residence, original date of appointment, length of service, tripartite sector, and as applicable, the organization, community, or business they represent;
- The agency's total projected revenue for the upcoming year with a list of the other anticipated sources of funding;
- An explanation of significant changes in funding from the previous year;
- Documentation the board reviewed and approved the CSBG application; and
- A signature from the agency's executive director.

As stated in Section III of the DCF contract, an agency's annual CSBG application is part of that agency's agreement with DCF. Agencies should submit an updated CSBG application in the instance of any changes in budget, programming, community needs, board approval, and board roster as described in Section 6.8. DCF may also require an agency to update or modify its CSBG application at any time.

6.3 Community Needs Assessment

Every three years, all eligible entities are required to conduct and submit a Community Needs Assessment (CNA). The purpose is to identify the greatest unmet poverty-related needs and the gaps in services for low-income individuals and families in an agency's service area, and to ensure that the agency is directing and adjusting its services regularly in response to the changing needs in the community. The agencies' governing boards must formally accept the completed CNA, which should be reflected in board meeting minutes provided to DCF.

The CNA must contain the following components:

- An analysis of information gathered directly from low-income individuals through methods such as surveys, focus groups, interviews, and/or community forums;
- Both qualitative and quantitative data on the agency's service area;
- Information gathered from community partners, including community-based organizations, faith-based organizations, public sector partners, private sector partners, and educational institutions;
- An analysis of the most recent data showing the incidence of poverty and its prevalence related to gender, age, and race/ethnicity in the agency's service area; and
- Key findings on the causes and conditions of poverty and the needs of the communities assessed.

Reference: Section 676(b)(11) of the CSBG Act, OCS Information Memorandum 82*, and* OCS Information Memorandum 138

6.4 Community Action Plan

Each agency must have an annual Community Action Plan developed under the guidance of the agency's board of directors, which provides a basis for directing and monitoring the agency's efforts in addressing poverty-related problems in the community. This plan is integrated into an eligible entity's annual CSBG application and outlines the services and activities the agency will implement, based on the findings of the CNA. It must be outcome-based and anti-poverty-focused. The board of directors' involvement and participation in the Community Action Plan is a vital component of compliance with the CSBG Act. The board of directors' record should clearly document their ongoing involvement and leadership in the development, implementation, and evaluation of the Community Action Plan. Board ratification of a staff-prepared plan does not demonstrate adequate involvement and leadership in compliance with the CSBG Act.

The board should establish processes to ensure ongoing involvement and participation in the development, implementation, and evaluation of the plan (ROMA cycle) that is responsive to the identified needs of the low-income population in the community served by the agency. The board must also ensure that the national CSBG goals and National Performance Indicators (NPIs) are incorporated in the formulation of the plan. For this reason, agencies' board members must receive ROMA training as described in Section 4.2.

The board must receive an update on the progress made on the Community Action Plan at least once every 12 months.

The Community Action Plan must include the following components:

- A description of the major poverty-related problems identified by the agency's most recent CNA;
- Prioritization of the identified problems by magnitude and severity;
- Identification of current levels of anti-poverty efforts, including an inventory of current local initiatives that exist to address the identified poverty-related problems and any major service gaps at the local level;

- Selection of problems that the agency will target for direct intervention and the specific programmatic approaches the agency will take;
- Goals, based on ROMA goals and NPIs, that state in precise terms what the agency proposes to accomplish through its activities during the period of the plan; and
- A plan for ongoing evaluation of the agency's activities.

Reference: Section 676(b)(11) of the CSBG Act, OCS Information Memorandum 82, and OCS Information Memorandum 138

6.5 Contract Process

The contract process begins once DCF approves an agency's annual CSBG application.

DCF sends contracts to agencies for signatures. The agencies have 60 days to sign and return their contracts. DCF uses the DocuSign system, which allows contracts to be routed and signed electronically. Full instructions on using DocuSign are available at: https://dcf.wisconsin.gov/files/finance/docusign.pdf.

Affirmative Action Plan

All contract agencies must submit an Affirmative Action Plan within 15 working days of returning their signed contract. Exceptions exist and are noted in the Wisconsin Department of Administration's Instructions for Vendors. An electronic version of the Instructions for Vendors and all forms required are available at: http://vendornet.State.wi.us/vendornet/Contract/contcom.asp.

Civil Rights Compliance

Every four years, agencies must provide assurance that they comply with DCF civil rights requirements. All contract agencies must submit a Letter of Assurance (LOA) stating their agency complies with all DCF civil rights requirements. If contract agencies receive funding from more than one state agency, they submit the LOA to the state agency from which the contract agency receives the most funding.

In addition, agencies that have 50 or more employees or receive $50,000 or more in funding must have a Civil Rights Compliance (CRC) plan that meets the requirements of DCF. The $50,000 threshold applies to the total funding received from DCF and two other state departments: the Department of Health Services and the Department of Workforce Development (DWD). The CRC plan requirement applies to both direct recipients of DCF contracts and subcontractors of those agencies. Agencies do not have to submit their CRC plan for state approval, but they must submit an LOA stating their agency complies with federal and state CRC requirements and the agency's CRC plan meets the state's requirements. DCF can request agencies to submit their full CRC plan and will conduct CRC reviews of agencies as necessary.

The LOA and CRC plan instructions and templates are available on the DCF website: https://dcf.wisconsin.gov/civilrights/plans.

6.6 Monthly Expenditure Reports and Payment Process

Contract agencies must submit claims for reimbursement electronically using DCF's cost reporting system, known as the System for Payments and Reports of Contracts (SPARC). Agencies report both CSBG direct program and administrative costs in SPARC each month. CSBG direct program and administrative costs are defined in Section 3.9 of this manual.

To gain access to SPARC, new users must visit DWD Wisconsin Logon Management System (User Acceptance Agreement at https://accounts.dwd.wisconsin.gov) and create a username (WIEXT ID) and password that will be used for the SPARC portal. Once a WIEXT ID is obtained, the user should fill out the SPARC Authorization Request form located at http://dcf.wisconsin.gov/files/forms/doc/5157.docx. Completed forms require a supervisor's signature and should then be emailed to

DCFFinanceGrants@wisconsin.gov. DCF Finance will email a new user after the SPARC account is set up. Instructions, user manuals, and other resources are available on DCF's SPARC website at https://dcfsparc.wisconsin.gov/.

SPARC Monthly Expenditure Reports for January through November must be submitted to DCF by close of business (4:30 pm Central Standard Time) on or before the 23rd day of the month for the previous month's activity. Late reports will be processed in the next month's payment cycle. The schedule for submitting SPARC reports is left to the discretion of each contract agency; reports may be submitted monthly or less frequently, depending on the agency's wish for reimbursement. The final expenditure report (for December of each contract year) is due within 60 days after the end of the grant period, which is typically March 1 of the year following the contract year. SPARC is a replacement system, meaning any adjustments to prior months after payment will override previous entries and self-correct with the agency's next payment. In the event a prior month's expenditure needs to be adjusted, the SPARC user must enter the full amount that should have been paid out for that month's report – not the difference from what was already received.

DCF requires all grants to be paid by direct deposit into grantees' accounts. After an expenditure report is submitted, DCF will issue the reimbursement using direct deposit on the last day of the same month, subject to reduction, recovery, and reimbursement as provided in the contract.

Total net reimbursement to an agency for allowable expenses will not exceed the contracted amounts specified in the contract. Net reimbursements under this contract may be adjusted for other amounts owed to DCF.

Reference: Section VI of DCF's contract

6.7 Carry Over Funds

Unspent funds may be carried over by an agency into the following year, however, Section 675C of the CSBG Act provides that a state may recapture or redistribute unobligated funds that exceed 20% of the agency's annual CSBG allocation. Therefore, DCF encourages agencies to spend at least 80% of their CSBG grant within the grant period. If an agency does not spend at least 80% of their award for two consecutive years, DCF may redistribute its unspent funds.

Contract agencies that did not spend 100% of their CSBG grants must contact the CSBG mailbox after the contract closes out (typically on March 1) to:

- Confirm the balance of unspent funds;
- Provide a brief explanation of why the funds were not utilized during the contract year;
- Explain how and when the carry over funds will be utilized during the carry over year;
- Indicate if the agency spent 100% of any carry over funds that it had from the previous contract year; and
- Provide an updated CSBG application with new budget to account for the unspent amount to be carried over.

The CSBG contract manager will review the agency's contract balance in the DCF SPARC system and verify the figure with the agency prior to issuing a contract amendment in the carry over year. Unexpended funds that are carried over must be used within the carry over year.

6.8 Contract and CSBG Application Modification Process

Agencies' CSBG contracts are modified as needed, including to add carry over funds from a previous year or to make allocation adjustments based on final Notice of Award letters from OCS. The revision is effective when a contract amendment is signed by authorized representatives of both DCF and the agency.

Agencies' CSBG Applications may be modified as needed, including by request of the CSBG contract manager, to report changes in the board roster, or to amend a budget due to changes in programming, funding, or other need. An agency shall submit a modified CSBG Application for the current contract year with a written explanation of changes to the CSBG contract manager. The CSBG contract manager may require additional board approval for an agency's modifications to its CSBG Application. The revision is effective when the CSBG contract manager provides written acceptance to the contract agency.

6.9 Funding Reduction and Termination

Per Section 676(c) of the CSBG Act, the only "causes" that can necessitate a reduction in funding would be:

- A statewide redistribution of funds in response to new census data;
- The designation of a new eligible entity;
- Severe economic dislocation; or
- The failure of the eligible entity to comply with the terms of an agreement or a state plan, or to meet a state requirement.

DCF would begin the process of terminating a contract agency's CSBG funding only if an agency fails over a period of time to take action to resolve significant findings that DCF had identified through the CSBG monitoring process, the annual CSBG Organizational Standards desk audit, or another documented method that an agency is not in compliance with state and/or federal CSBG requirements. This would take place after an agency has failed to make adequate progress through the normal technical assistance and/or corrective action plan processes described in Sections 7.3 and 7.4 and, at the state's discretion, has had the opportunity to develop and implement a Quality Improvement Plan (QIP). DCF will only begin the process of de-designating an agency if it fails to cooperate with DCF and continues to not meet program and contractual requirements.

In alignment with Section 678(b)(8) of the CSBG Act and Wis. Stat. s. 49.625(2)(c), DCF would work with the legislative body of the county… to reach a final decision to de-designate a CAA. At least 90 days before rescinding approval, DCF would notify the agency of its reasons for the action and hold a public hearing in the community. If after holding the public hearing DCF finds cause to terminate or reduce funding, DCF will initiate proceedings to terminate the designation of or reduce the funding to the eligible entity. DCF would notify both the eligible entity and OCS of its decision. The eligible entity would have 30 days following notification of DCF's decision to request a federal review by HHS. In alignment with OCS Information Memorandum 116, DCF will provide the affected eligible entity with information on how to request a federal review.

If the eligible entity requests a federal review, DCF will not discontinue present or future funding until HHS responds to the request. If the eligible entity does not request a federal review within the 30-day limit, DCF's decision will be effective at the expiration of the 30-day period.

References: Section 676(b)(8) of the CSBG Act, *Section 678C(b) of the* CSBG Act, *and* Wis. Stat. s. 49.625(2)(c)

SECTION 7: Grant Administration

7.1 Monitoring

The purpose of the monitoring process is to verify compliance with federal CSBG requirements, state statutes, ROMA, the agency's annual CSBG application, and DCF policies.

Section 678B(a)(1) of the CSBG Act requires the DCF to conduct a full onsite review of each CSBG recipient agency at least once every three years. Newly designated eligible entities will be monitored

immediately after the completion of the first year in which the agency receives CSBG funds. DCF may monitor an agency more frequently if the agency has unique circumstances or issues; has failed to meet goals, standards, or requirements established by DCF; has experienced turnover in its executive director and/or chief financial officer positions; or has had other federal, state, or local grants other than CSBG terminated for cause. In particular, DCF is required to review the cause of termination for other federal grant programs to assure comparable issues do not exist for CSBG funds.

DCF's monitoring process for CSBG agencies is guided by DCF's monitoring tool, which is reviewed and updated concurrent with the CSBG State Plan every two years. This tool is available to all agencies on the DCF CSBG webpage. Monitoring typically includes a desk review of agency records, a survey and/or interview of the agency's board of directors, and an onsite monitoring visit. The onsite visit includes interviews with agency leadership and reviews of fiscal records, participant case files, and other records related to the agency's programs and management.

DCF will make every effort to keep the following timelines when scheduling and issuing reports for monitoring visits, while acknowledging that exceptions and extenuating circumstances may exist:

- Monitoring visits will be scheduled a minimum of one month in advance.
- Monitoring reports will be sent within 60 days of the visit.

DCF may conduct portions or all of an onsite monitoring visit virtually, via Microsoft Teams, Zoom, or other video conferencing platform.

DCF is also required to thoroughly investigate any instances of "whistleblower" complaints or allegations of fraud or abuse of CSBG funds or funds from closely-related programs such as Head Start, the Low Income Home Energy Assistance Program (LIHEAP or EAP), or the Weatherization Assistance Program (WAP). In any instances in which complaints or allegations of fraud are considered credible, DCF will inform OCS of findings and OCS may assist with additional compliance review or referral to appropriate investigative authorities.

Reference: OCS Information Memorandum 116

7.2 Annual CSBG Organizational Standards Assessment

As of October 1, 2015, all CSBG eligible entities are required to meet the CSBG Organizational Standards that were developed by the OCS-supported CSBG Organizational Standards Center of Excellence and reflect the requirements of the CSBG Act, good management practices, and the values of the Community Action network. There are 58 individual standards in nine categories focused on three main themes: Maximum Feasible Participation, Vision and Leadership, and Operations and Accountability.

Federal regulation requires DCF to assess each CSBG eligible entity annually to ensure that it is meeting all standards or making steady progress toward meeting all standards. DCF accomplishes this through an annual desk audit. This process will require the contract agencies to conduct a self-assessment related to the CSBG Organizational Standards and submit documentation to DCF to demonstrate their compliance with the standards.

The annual desk audit takes place on the federal fiscal year. DCF will provide each eligible entity with the desk audit form. Completed forms and supporting documentation, including board meeting minutes, are typically due to DCF on October 1 of each year, covering the prior federal fiscal year. Agencies can email their submissions to the CSBG mailbox (DCF.CSBG@wisconsin.gov), or request access to a secure DCF SharePoint site for file sharing. Users can only access DCF SharePoint sites using their WIEXT ID. See Section 4.8 of this manual for instructions on obtaining a WIEXT ID.

Reference: OCS Information Memorandum 138

7.3 Corrective Action

Technical Assistance Plans (TAPs)

If DCF determines through the annual CSBG Organizational Standards desk audit process or other documented method that an agency is not in compliance with one or more of the CSBG Organizational Standards, DCF will identify the specific deficiencies in an email issued to the agency. The email will document the basis for DCF's determination, and the agency will be asked to complete a TAP form, in a format provided by DCF, which must identify the actions an agency will take to correct the deficiency within a reasonable period. The completed TAP form will be due back to DCF within 30 days, or by another date as approved by DCF.

Circumstances under which a TAP may not be leveraged for an eligible entity with unmet Organizational Standards include: (1) an upcoming monitoring visit already scheduled during which DCF will re-evaluate the eligible entity's compliance with the Organizational Standards; (2) an eligible entity's deficiencies have already been corrected between the compliance deadline and the time at which a TAP would be issued for such deficiencies; and (3) extenuating circumstances preventing an eligible entity from complying with an Organizational Standard have been presented to DCF, and the eligible entity has documented its ability to comply at a future date, approved by DCF.

Eligible entities on TAPs will receive T/TA until Organizational Standards are met. DCF evaluates each eligible entity's compliance with all 58 Organizational Standards on an annual basis through a desk audit, and under certain circumstances more frequently, including the implementation of a TAP or a scheduled monitoring visit. DCF will: (1) provide relevant resources to the eligible entity out of compliance, including those from local, state, and national partners; (2) refer the eligible entity to WISCAP for T/TA; and/or (3) consult with the eligible entity directly until the deficiencies are corrected or it is determined that corrective action will need to take place.

Corrective Action Plans (CAPs)

If DCF determines through an onsite monitoring visit, a TAP that has not been completed or is unsatisfactory in curing any deficiencies, or another documented method an agency is not in compliance with state and/or federal CSBG requirements, DCF will identify the specific deficiencies in a monitoring report issued to the agency within 60 days of determination of noncompliance. The monitoring report will document the basis for DCF's determination, and the agency will be asked to complete a CAP within 60 days of request from DCF to address the issues identified. The CAP must identify the actions the agency will take to correct the deficiency within a reasonable period. Alternately, the agency may provide documentation corrections have already been made, and therefore a CAP is not needed for the issue(s) in question. DCF will have 30 days to approve the agency's proposed CAP or specify the reasons why the proposed plan cannot be approved. If the CAP is approved, DCF will monitor the contract agency's progress towards compliance. If deemed necessary, DCF may conduct an onsite follow-up review, desk audit, or other monitoring activity as appropriate. During the follow-up review, each finding listed in the original report will be addressed and documented as being "corrected," "not corrected," or "corrective action in progress." Any findings not corrected will continue to be documented in subsequent monitoring reports until satisfactorily corrected or closed as a result of providing verification of compliance. an eligible entity may request training and technical assistance from DCF to assist the agency in resolving all findings in a timely manner. Within 60 days of receiving documentation that the finding(s) have been corrected, DCF will provide written notification of closure of finding(s).

If DCF determines an agency has failed to address its findings through the CAP process, the agency will be deemed to be at "high risk" and DCF will follow the process outlined in Section 678C of the CSBG Act and the guidelines provided in OCS Information Memorandum 116. DCF will require the agency to develop and implement a QIP within 60 days after being informed of its unresolved deficiencies. As required, DCF

will communicate with OCS regarding the situation. The QIP must include plans to resolve the identified deficiencies within a reasonable period of time. Within 30 days after receiving the QIP, DCF will either approve the contract agency's proposed QIP or specify the reasons why it cannot be approved. If a contract agency fails to make progress on an approved QIP, DCF may initiate proceedings to terminate the agency's designation as an eligible entity or reduce its funding.

Reference: OCS IM 116, Wisconsin CSBG State Plan, Section 678C of the CSBG Act, and *Wis. Stat. s. 49.265(2)(c)*

7.4 Training, Technical Assistance, and Other Resources

As the lead agency for CSBG administration in Wisconsin, DCF is responsible for providing eligible entities with a range of technical assistance and training in order to establish and maintain sound grant management and program practices. DCF contracts with WISCAP to carry out these responsibilities. Training and technical assistance is available throughout the term of the grant in a variety of formats: email dissemination of resources, virtual & online trainings, in-person trainings, one-on-one consultations, board presentations, roundtables, and conference sessions. Notice of trainings, whether in-person or virtual, will be sent via email from either the CSBG contract manager or WISCAP. Each eligible entity is responsible for ensuring the appropriate staff members are on WISCAP and DCF's CSBG distribution lists. In the event of staff turnover, eligible entities should contact both WISCAP and the DCF contract manager to notify of changes.

An archive of recorded trainings and other resources is available as part of WISCAP's member services. Please contact WISCAP for access.

Key CSBG trainings and resources can be found on DCF's website at https://dcf.wisconsin.gov/csbg, and by scrolling to the bottom of the page for the "Training and Resources" drop-down menu.

DCF leverages several national partners for CSBG training and resources as well. Agencies looking for additional content on CSBG-related requirements, best practices, and other topics should consider the following resources:

- The National Community Action Partnership (NCAP) resource library.
- The National Association for State Community Services Programs (NASCSP) CSBG Resources and Annual Report resources pages.
- The Office of Community Services CSBG website, including CSBG Information Memoranda.
- The CAPLAW resource library.

Reference: Section 678A of the CSBG Act

SECTION 8: Reporting Requirements

8.1 CSBG Annual Report

The CSBG Annual Report is a mandatory, annual federal report for every eligible entity and state office that administers CSBG funds. Eligible entities use ROMA methodology to provide a comprehensive picture of the transformative work they engage in toward the realization of the national CSBG goals.

The CSBG Annual Report is comprised of four modules:

- **Module 1**—contains state-specific information and is completed by DCF;
- **Module 2**—contains agency-specific capacity, expenditures by domain, and coordination of funds;
- **Module 3**—identifies agencies' community-level work; and
- **Module 4**—contains outcome measures (NPIs) that demonstrate the impact of the eligible entity's programs and activities on low-income individuals, families, and communities, as well as

a report on the numbers and demographic characteristics of individuals served in the year. The NPIs correspond to the three national CSBG goals.

Agencies are required, through compliance with the organizational standards, to implement actions that focus on results-oriented management and results-oriented accountability. Agencies develop and implement strategies to measure and record improvements in the condition of low-income people and communities in which they live that result from Community Action intervention. Information about outcomes and results are used by tripartite boards and staff to determine overall effectiveness of programs, inform annual and long-term planning, and to support agency advocacy, funding, and community partnership activities.

Reference: OCS Information Memorandum 49

DCF's Responsibilities for the CSBG Annual Report

DCF completes Module 1 of the CSBG Annual Report. DCF is responsible for collecting Modules 2, 3, and 4 from all contract agencies, and submitting a final report to OCS via its Online Data Collection system (OLDC). DCF provides training opportunities and technical assistance on all modules annually.

Contract Agencies' Responsibilities for the CSBG Annual Report

Each contract agency must complete Modules 2, 3, and 4 of the CSBG Annual Report and demonstrate their program outcomes using the NPIs. Contract agencies are also responsible for maintaining back-up documentation to support the data reported in their CSBG Annual Report. It is important to note that the CSBG Annual Report relates to all of the agency's activities, not just services directly funded by CSBG.

Process for Completing the CSBG Annual Report

1. OCS works with NASCSP to create and release the CSBG Annual Report forms. The forms are in the format of an Excel workbook, programmed uniquely for each eligible entity and commonly referred to as "SmartForms";
2. Contract agencies complete their SmartForms and submit them to DCF via email by a designated due date, typically in mid-February;
3. DCF performs quality control checks on the data from the contract agencies and follows up with individual agencies for any needed clarification;
4. DCF finalizes, approves, and uploads the final aggregated CSBG Annual Report to OLDC by March 31;
5. DCF responds to any inquiries from OCS regarding the submitted data. OCS sends these inquiries in a "clean-up" or "review memo" format, and DCF works with contract agencies as needed to correct, modify, or otherwise respond to this memo; and
6. Once all inquiries have been answered and accepted by OCS, DCF makes edits to its original CSBG Annual Report submission in OLDC for final acceptance.

8.2 DCF Yearend Expenditure Reports

DCF requires all contract agencies to submit a yearend expenditure report with a comparison of their actual CSBG expenditures to what was budgeted and approved in their CSBG Application, the number of people or households they have served compared to pre-grant period projections, and a description of the progress of each program that is supported by CSBG funds. DCF provides the form for this report, which is emailed to the agencies during the first quarter of the calendar year. The completed DCF yearend expenditure report is submitted via SPARC as a "performance report" upload after the close of the grant period in SPARC (March 1).

8.3 State Annual Reports

Wisconsin State Statute requires DCF to provide an annual report on the activities and effectiveness of Wisconsin's CSBG program to the state legislature.

Reference: Wis. Stat. s. 49.265(6)

SECTION 9: Other Requirements for Contract Agencies

9.1 Communications

DCF communicates with its grantees primarily by email. DCF maintains an email distribution list of the executive directors and other key staff at each eligible entity. Due dates, reporting forms, training announcements, policy updates, requests for feedback, and other pertinent information is communicated via email to this distribution list. Each eligible entity is responsible for complying with the information contained in these communications and ensuring appropriate staff members are on the distribution list. In the event of staff turnover, contract agencies should contact both WISCAP and the DCF CSBG mailbox (DCF.CSBG@wisconsin.gov) to notify of changes.

9.2 Privacy of Program Participants

Contract agencies must establish internal policies to protect the privacy of program participants. Electronic and paper records must be secured, with access to records limited to appropriate staff. Contract agencies providing health care services must maintain client privacy and records in compliance with the Health Insurance Portability Accountability Act (HIPAA), Public Law 104-191.

9.3 Personnel Policy

The board of directors of each contract agency must develop and approve written personnel policies that are reviewed by the board and an attorney not less than every five years and updated as needed. The policies must include:

- Equal employment;
- Discipline and termination policies;
- Grievance procedures,
- Job classifications,
- Explanation of fringe benefits, including leave and holidays;
- Whistleblower/anti-retaliation policy;
- Travel policy;
- Non-discrimination statement;
- Conflict of interest policy;
- Nepotism statement;
- Definition of work day, work week, and hours;
- Rules governing the use of overtime; and
- A policy requiring all staff driving on company business to have a current driver's license; and
- A policy for regular written evaluation of employees by their supervisors.

Either within the personnel policies or in a separate document, the board of directors must also establish rates of compensation for each staff position.

Reference: OCS Information Memorandum 138

9.4 Conflict of Interest Policy

All contract agencies must have a written conflict of interest policy that applies to all staff, board members, and volunteers. This policy should focus on the prevention of self-dealing where individuals take advantage of their position within the organization to enrich themselves or gain other advantage. At least every two years the contract agencies' board members must sign a statement they will comply with the agency's conflict of interest policy.

Reference: OCS Information Memorandum 138

9.5 Referrals to Drug Treatment Services

Per Section 678G(a) of the CSBG Act, if a contract agency tests participants in its programs, activities, or services for controlled substances, the contract agency must inform any participants who test positive for controlled substances about the availability of treatment and rehabilitation services and refer them for appropriate treatment and rehabilitation. Any CSBG funds used for such testing will be considered to be expended for administrative expenses.

9.6 Child Support Services and Referrals

Per Section 678G(b) of the CSBG Act, contract agencies are required to inform custodial parents in single-parent families they serve about the availability of child support services by referring eligible parents to the local child support agency. Documentation of this referral must be evidenced in an applicable participant's file, for any programs funded fully or in part by CSBG. A list of Wisconsin's local child support agencies is available online at: https://dcf.wisconsin.gov/cs/resources/cs-contacts. Contract agencies can find informational materials about Wisconsin's Child Support Program for distribution to eligible parents at https://dcf.wisconsin.gov/cs/publications-topics .

9.7 Collaboration with Other Service Providers

Contract agencies must develop collaborative relationships with other providers of services to low-income individuals and families in their area. Specifically, there must be coordination, cooperation, and referral relationships between contract agencies and agencies that provide Wisconsin Works, Job Access Loans, Emergency Assistance, Refugee Services, FoodShare, and Medical Assistance.

9.8 Political Activity Policy

To ensure compliance with Section 678F(b) of the CSBG Act, contract agencies must have a written political activity policy that prohibits partisan political activity. In addition, contract agencies must ensure that CSBG funds are not used for partisan or non-partisan political activity, voter registration activities or to transport voters to polls.

9.9 Audit Requirements

All contract agencies must have an annual Single Audit conducted by an independent accounting firm, and submit a copy electronically to DCFauditors@wisconsin.gov in accordance with the process outlined in their contracts. All eligible entities must solicit new bids for its audit at least once every five years. If an agency has a finding or recommendation in its audit report, DCF's Fiscal Integrity and Audit Section will review and monitor the agency's corrective action activities and require evidence that all identified deficiencies have been resolved. Late audit reports will result in an elevated risk assessment, which may lead to increased monitoring effort, delayed contracts, or other remedies as deemed necessary by DCF.

Reference: DCF Allowable Cost Manual, OCS Information Memorandum 138