



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**  
 Office of Community Services

## Community Services Block Grant (CSBG) State Plan

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THE PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13): Through this information collection, ACF is gathering information about planned activities related to and funded by CSBG for the upcoming fiscal year. Public reporting burden for this collection of information is estimated to average 31 hours per grantee, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. This is a mandatory collection of information (Sec. 676, Pub. L. 105-285, 112 Stat. 2735 (42 U.S.C. § 9908)). An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information subject to the requirements of the Paperwork Reduction Act of 1995, unless it displays a currently valid OMB control number. The OMB # is 0970-0382 and the expiration date is XX/XX/XXXX. If you have any comments on this collection of information, please contact M. Monique Alcantara at [melania.alcantara@acf.hhs.gov](mailto:melania.alcantara@acf.hhs.gov).

## SECTION 1: CSBG Administrative Information

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

**1.1a.** Provide the federal fiscal years this plan covers: Year One [FFY2024](#) Year Two [FFY2025](#)

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

**1.2. Lead Agency and Authorized Official:** Update the following information in relation to the lead agency and authorized official designated to administer CSBG in the state, as required by Section 676(a) of the CSBG Act. Information should reflect the responses provided in the Application for Federal Assistance, SF-424M.

Has information regarding the state lead agency and authorized official changed since the last submission of the State Plan? ☒ Yes ☐ No

If yes, select the fields that have changed.

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

**1.2a.** Lead agency [Wisconsin Department of Children and Families](#)

**GUIDANCE:** Please only provide the exact name of the CSBG state lead agency as designated within the designation letter and an acronym (as applicable).

**EXAMPLE:** Office of Community Services (OCS)

**1.2b.** Cabinet or administrative department of this lead agency

- ☐ Community Affairs Department
- ☐ Community Services Department
- ☐ Governor’s Office
- ☐ Health Department
- ☐ Housing Department
- ☒ Human Services Department
- ☐ Social Services Department
- ☐ Other, describe: [Narrative, 100 characters]

**1.2c. Cabinet or Administrative Department Name:** Provide the name of the cabinet or administrative department of the CSBG authorized official [Secretary’s Office](#)

**1.2d. Authorized Official of the Lead Agency:** The authorized official could be the director, secretary, commissioner etc. as assigned in the designation letter (attached under item 1.3.). The authorized official is the person indicated as the authorized representative on the SF-424M and the official recipient of the Notice of Award per Office of Grant Management requirements.

Name [Jeff Pertl](#)

Title [Secretary](#)

**1.2e.** Street Address [201 West Washington Ave](#)

**1.2f.** City [Madison](#)

**1.2g.** State [WI](#)

**1.2h.** Zip Code [53703](#)

**1.2i.** Telephone Number [608-422-7000](#)

**1.2j.** Fax Number [608-422-7163](#)

**1.2k.** Email Address [jeff.pertl@wisconsin.gov](mailto:jeff.pertl@wisconsin.gov)

**1.2l.** Lead Agency Website [www.dcf.wisconsin.gov](http://www.dcf.wisconsin.gov)

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

**1.3. Designation Letter:** Attach the state's official CSBG designation letter. A new designation letter is required if the chief executive officer of the state and/or designated agency has changed [See Attachment: 1.3 CSBG Designation Letter](#)

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

**INSTRUCTIONAL NOTE:** The letter should be from the chief executive officer of the state and include, at minimum, the designated state CSBG lead agency (office, department, or bureau) and title of the authorized official of the lead agency who is to administer the CSBG grant award.

**1.4. CSBG Point of Contact:** Provide the following information in relation to the designated state CSBG point of contact. The state CSBG point of contact should be the person that will be the main point of contact for CSBG within the state.

Has information regarding the state point of contact changed since the last submission of the State Plan? ☒ Yes ☐ No

If yes, select the fields that have changed.

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

**1.4a.** Agency Name [Wisconsin Department of Children and Families](#)

**1.4b.** Point of Contact Name

Name [Lauren Frederick and Barb Schachern](#) Title [CSBG Contract Managers](#)

**1.4c.** Street Address [201 West Washington Avenue](#)

**1.4d.** City [Madison](#)

**1.4e.** State [WI](#)

**1.4f.** Zip Code [53703](#)

**1.4g.** Telephone Number [608-220-4148; 608-422-6262](#)

**1.4h.** Fax Number [608-261-6376](#)

**1.4i.** Email Address [lauren.frederick@wisconsin.gov](mailto:lauren.frederick@wisconsin.gov);  
[barbara.schachern@wisconsin.gov](mailto:barbara.schachern@wisconsin.gov)

**1.4j.** Agency Website [www.dcf.wisconsin.gov](http://www.dcf.wisconsin.gov)

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

There is currently a state Community Action Association within the state. ☒ Yes ☐ No

Has information regarding the state Community Action Association changed since the last submission of the State Plan? ☒ Yes ☐ No

If yes, select the fields that have changed.

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

**1.5a.** Agency name [Wisconsin Community Action Program Association \(WISCAP\)](#)

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

Name [Cheryl Detrick](#) Title [WISCAP Board President](#)

**1.5c.** Street Address [30 W Mifflin St. STE 406](#)

**1.5d.** City [Madison](#)

**1.5e.** State [WI](#)

**1.5f.** Zip Code [53703](#)

**1.5g.** Telephone Number [608-244-4422](#)

**1.5h.** Fax Number [608-244-4064](#)

**1.5i.** Email Address [cheryldetrick@newcap.org](mailto:cheryldetrick@newcap.org)

**1.5j.** State Association Website [www.wiscap.org](http://www.wiscap.org)

**1.5k.** State Association currently serves as the Regional Performance Innovation Consortia (RPIC) lead ☒ Yes ☐ No

## SECTION 2: State Legislation and Regulation

- 2.1. **CSBG State Legislation:** State has a statute authorizing CSBG. ☒ Yes ☐ No
- 2.2. **CSBG State Regulation:** State has regulations for CSBG. ☐ Yes ☒ No
- 2.3. **Legislation/Regulation Document:** Attach the legislation and/or regulations or provide a hyperlink(s) to the documents indicated under Items 2.1. and/or Item 2.2.  
<http://docs.legis.wisconsin.gov/statutes/statutes/49/III/265>

### **GUIDANCE:**

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

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

- 2.4. **State Authority:** Select a response for each of the following items about the state statute and/or regulations authorizing CSBG:
- 2.4a. **Authorizing Legislation:** State legislature enacted authorizing legislation or amendments to an existing authorizing statute last federal fiscal year. ☐ Yes ☒ No
- 2.4b. **Regulation Amendments:** State established or amended regulations for CSBG last federal fiscal year. ☐ Yes ☒ No

## SECTION 3: State Plan Development and Statewide Goals

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

Wisconsin's Community Services Block Grant (CSBG) lead agency is the state's Department of Children and Families (DCF), which has the mission of promoting the economic and social well-being of Wisconsin's children and families. DCF is committed to protecting children and youth, strengthening families, and supporting communities.

DCF operates over 30 programs in the following categories:

- Child Protective Services
- Milwaukee Child Welfare
- Domestic violence response
- Child Support
- Child Care Regulation and Licensing
- Child Care Subsidy
- Refugee and Immigrant Integration
- Special Needs Adoption
- Foster Care
- Kinship Care
- Temporary Assistance for Needy Families (TANF)

DCF's Division of Family and Economic Security (DFES), Bureau of Working Families is responsible for administering CSBG funds. Along with CSBG, DFES administers the Temporary Assistance for Needy Families (TANF) cash assistance program, which is known as Wisconsin Works (W-2), Refugee Services, and the Child Support program. This provides for coordination of programming to help impoverished families and assists in the Division's vision: *that every individual, child, and family is economically and socially secure.*

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

1. DCF will identify and implement resources for eligible entities for the collection, analysis, and application of Community Needs Assessment data statewide. Per State Accountability Measure 1Sa(i), this goal will be realized through the following strategies:
  - a. Targeted Training and Technical Assistance (T/TA) by WISCAP through a contract with DCF;
  - b. Meetings with WISCAP to specifically discuss progress on this goal at least quarterly;
  - c. Formation of a Community Needs Assessment work group; and
  - d. Analysis of 2022 Community Needs Assessment data.
  - e. Create more robust discussions and requests for feedback following the Community Needs Assessments.

- f. Linking outcomes from the statewide plan to individual plans. A data driven approach which includes utilizing the national CSBG Performance Management website.
- 2. DCF along with the eligible entities will become more participant focused by providing participants a voice by collecting information from the eligible entities participants surveys; this goal will be realized through the following strategies:
  - a. Collaboration with eligible entities connecting more often to share barriers participants are experiencing with getting connected to resources, obtaining and sustaining employment;
  - b. DCF CSBG Contract Managers building collaboration with other DCF programs to strengthen communication and share barriers participants are experiencing;
  - c. Eligible entities building more collaboration with county social services, public health, DWD, ADRC, etc.;
  - d. Connecting participants to other programs that can serve them if their income is above the 125% federal poverty level.
- 3. Become accountable partners to our stake holders, to those we serve, and to each other in order to eliminate institutionalized racism and other forms of oppression. Develop a healthy culture by creating opportunities for open dialogue and creative collaborative solutions to equity, inclusion and diversity concerns.
  - a. Offer ongoing training and learning opportunities as well as routing information about relevant webinars.
  - b. Invite subject matter experts to share their expertise and knowledge of the history of racism and oppression with eligible entities and DCF.
  - c. DCF and eligible entities will review and revise policies using an equity lens to help identify whether new policies, regulations or guidance documents may be necessary to advice equity in agency actions and programs.

**GUIDANCE:** States should consider feedback from OCS, their eligible entities, and the ACSI survey completed by eligible entities when creating their State Plan goals.

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

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

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

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

- ☒ State Performance Indicators and/or National Performance Indicators (NPIs)
- ☒ U.S. Census data
- ☒ State Performance Management Data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)
- ☒ Monitoring Visits/Assessments
- ☐ Tools Not Identified Above (specify)

### **3.3b. Analysis of local-level tools**

- ☒ Eligible Entity Community Needs Assessments
- ☒ Eligible Entity Community Action Plans
- ☒ Public Hearings/Workshops
- ☐ Tools Not Identified Above (e.g., state required reports) [specify]

### **3.3c. Consultation with**

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

## **3.4. Eligible Entity Involvement**

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

DCF involved the eligible entities in the development of this State Plan in the following ways:

- Eligible entities were briefed on the CSBG State Plan process and encouraged to ask questions and provide feedback at:
  - The WISCAP board of directors meeting on February 02, 2023; The CSBG contract managers discussed the State Plan process and timeline with the eligible entities to include the CSBG State Plan Kick Off Meeting details.
  - A CSBG State Plan Kick Off Meeting hosted by DCF on February 08, 2023.
  - On March 06, 2023, a DCF Updates were sent to eligible entities via email, sending a friendly reminder that DCF is open for feedback regarding the State Plan prior to DCF sharing the draft at the WISCAP annual conference on May 03, 2023. Eligible entities were reminded they can locate the current plan on DCF's CSBG website at [CSBG website](#).
  - On March 30, 2023, a DCF Updates were sent to eligible entities via email, sending a friendly reminder that DCF is open for feedback regarding the State



Plan prior to DCF sharing the draft at the WISCAP annual conference on May 03, 2023. Eligible entities were reminded they can locate the current plan on DCF's CSBG website at [CSBG website](#).

- The WISCAP annual conference on May 03, 2023. The CSBG contract managers held a roundtable discussion with the eligible entities and discussed the State Plan process and timeline.
- DCF provided an opportunity for all eligible entities to provide any feedback by June 1, 2023.

DCF ensured that all eligible entities received notice of the combined public and legislative hearing on the CSBG State Plan to be held on July 14, 2023, and encouraged eligible entities to post the notice and plan when they receive it in their local communities and participate in the hearing.

As an ongoing effort, the State will be creating workgroups to monitor and ensure progress is being made on the goals and action steps. The State will be inviting the eligible entities and the State Association to participate in the workgroups. Other subject matter experts will be invited to join.

UPDATE: In 2024, DCF acknowledged a need for additional reserved administrative dollars. This was expressed to the WISCAP board of directors, made up of the CAA Executive Directors, by oral communication on May 21, 2024. DCF would be making a change to the planned allocation discussed in Section 7.1. The agencies were provided written documentation on August 8, 2024, outlining reasons for the change and the plan going forward. DCF distributed notice of changes and hearing on September 30, 2024, following the procedure listed in Section 4.2. The public hearing date occurred October 21, 2024. These steps included posting on CSBG website and publishing notice of public comments.

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

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

DCF increased opportunities for eligible entity discussion and feedback for the implementation of the FY2024-2025 CSBG State Plan. DCF added the in-person opportunity to provide feedback at the WISCAP annual conference at a CSBG State Plan roundtable and board meeting.

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

**3.5. Eligible Entity Overall Satisfaction:** Provide the state's target for eligible entity Overall Satisfaction during the performance period. Year One [89](#) Year Two [89](#)

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

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

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

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

## SECTION 4: CSBG Hearing Requirements

**4.1. Public Inspection:** Describe the steps taken by the state to disseminate this State Plan to the public for review and comments prior to the public hearing, as required under Section 676(e)(2) of the Act. DCF made the CSBG State Plan and State Plan updates available for public inspection and comment by posting the plan on the department's website and including a link to the plan on all notices about the public hearing; additionally, it was posted on the Wisconsin Public Meeting Notices and Minutes for all Wisconsin State Departments to view. DCF requested each eligible entity post the draft plan at their service locations for public view and comment.

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

**4.2. Public Notice/Hearing:** Describe how the state ensured there was sufficient time and statewide distribution of notice of the public hearing(s) to allow the public to comment on the State Plan, as required under 676(a)(2)(B) of the CSBG Act. DCF Distributed notice about the hearing on June 15, 2023. This allowed 30 days for the public to comment in advance of the hearing date. DCF used the following methods to distribute notice: (1) sending hearing notice to all eligible entities and WISCAP for review and dissemination within their communities to stakeholders and key partners; (2) sending the hearing notice to other State Agency Departments via the Wisconsin Public Meeting Notices and Minutes website; (3) posting the notice on DCF's website (4) Posting the notice at the State Capitol's public meeting bulletin for legislative bodies and administrative offices for the State to view; and (5) sending the hearing notice to the Wisconsin State Journal, a statewide news medium obligated to give notice to persons affected in accordance with Wis. Stat. s. 19.84.

UPDATE: DCF made updates to Section 7 of the State Plan. DCF distributed notice of the changes and hearing on September 30, 2024. This allowed 21 days for the public to comment in advance of the hearing date, which was set for October 21, 2024. The same methods of distribution were used for the updates as outlined above.

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

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

three years and must have occurred within the last three years prior to the first federal fiscal year covered by this plan.

Date	Location	Type of Hearing <i>[Select an option]</i>	If a Combined Hearing was held confirm that the public was invited.
July 14, 2023	Via Zoom	<input type="radio"/> Public <input type="radio"/> Legislative <input checked="" type="radio"/> Combined	<input checked="" type="checkbox"/>
October 21, 2024	Via Zoom	<input type="radio"/> Public <input type="radio"/> Legislative <input checked="" type="radio"/> Combined	<input checked="" type="checkbox"/>

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

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

<https://dcf.wisconsin.gov/csbg>

<https://publicmeetings.wi.gov/view/33e0ba1c-ba5b-406c-85a5-5721d0b5216f/1>

Update: <https://publicmeetings.wi.gov/view/3b2fb962-ee38-4e87-9326-2ff444ff7aa8/4>

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

**EXAMPLE NAMING CONVENTION:** 4.4. Public and Legislative Hearings Agenda 062117

## SECTION 5: CSBG Eligible Entities

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

CSBG Eligible Entity	Geographical Area Served (by county) [Provide all counties]	Public or Nonprofit	Type of Entity [Choose all that apply]
ADVOCAP, Inc.	Fond du Lac, Winnebago and Green Lake Counties	Nonprofit	Community Action Agency
CAP Services, Inc.	Marquette, Outagamie, Portage, Waupaca, and Waushara Counties	Nonprofit	Community Action Agency
Central Wisconsin Community Action Council, Inc.	Adams, Columbia, Dodge, Juneau, and Sauk Counties	Nonprofit	Community Action Agency
Community Action Coalition for South Central Wisconsin, Inc.	Dane, Jefferson, and Waukesha Counties	Nonprofit	Community Action Agency
Community Action Inc. of Rock and Walworth Counties	Rock and Walworth Counties	Nonprofit	Community Action Agency
Couleecap, Inc.	La Crosse, Monroe, Vernon, and Crawford Counties	Nonprofit	Community Action Agency
Indianhead Community Action Agency, Incorporated	Burnett, Clark, Rusk, Sawyer, Taylor, and Washburn Counties	Nonprofit	Community Action Agency
Lakeshore CAP, Inc. of Wisconsin	Door, Kewaunee, Manitowoc, and Sheboygan Counties	Nonprofit	Community Action Agency
Newcap, Inc.	Brown, Shawano, Oconto, Menominee, Langlade, Oneida, Vilas, Forest, Florence, and Marinette Counties	Nonprofit	Community Action Agency
North Central Community Action Program, Inc.	Marathon, Wood, and Lincoln Counties	Nonprofit	Community Action Agency
Northwest Wisconsin Community Services Agency, Inc.	Douglas, Bayfield, Ashland, Iron, and Price Counties	Nonprofit	Community Action Agency
Racine/Kenosha Community Action Agency, Inc.	Racine and Kenosha Counties	Nonprofit	Community Action Agency

CSBG Eligible Entity	Geographical Area Served (by county) [Provide all counties]	Public or Nonprofit	Type of Entity [Choose all that apply]
Community Relations- Social Development Commission	Milwaukee County	Nonprofit	Community Action Agency
Southwestern Wisconsin Community Action Program, Inc.	Richland, Iowa, Grant, Lafayette, and Green Counties	Nonprofit	Community Action Agency
West Central Community Action Agency, Inc.	Chippewa, Dunn, Pepin, Pierce, St. Croix, Polk, and Barron Counties	Nonprofit	Community Action Agency
Western Dairyland Economic Opportunity Council, Incorporated	Trempealeau, Buffalo, Eau Claire, and Jackson Counties	Nonprofit	Community Action Agency
Foundation for Rural Housing, Inc.	Statewide, except for Dane, Milwaukee, and Racine Counties	Nonprofit	Limited Purpose Agency
United Migrant Opportunity Services/UMOS Inc.	Statewide	Nonprofit	Migrant or Seasonal Farmworker Organization

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

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

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

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

**INSTRUCTIONAL NOTE: 90 percent funds** are the funds a state provides to eligible entities to carry out the purposes of the CSBG Act. As described under Section

675C of the CSBG Act, a state must provide to the eligible entities “not less than 90 percent” of their CSBG allocation “made available to a state under Section 675A or 675B.

**5.2.** Total number of CSBG eligible entities: 18 **[This will automatically update based on Table 5.1.]**

**5.3. Changes to Eligible Entities List:** Within the tables below, describe any changes that have occurred to the eligible entities within the state since the last federal fiscal Year (FFY), as applicable.

One or more of the following changes were made to the eligible entity list:

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

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

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

CSBG Eligible Entity	Type	Start Date	Geographical Area Served
N/A			

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



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

CSBG Eligible Entity	Reason
N/A	

**5.3c. Mergers:** In the table below, provide information about any mergers or other combinations of two or more eligible entities that were individually listed in the prior State Plan.

Original CSBG Eligible Entities	Surviving CSBG Eligible Entity	New Name (as applicable)	DUNS No.
N/A			

**GUIDANCE:** This question refers to the merger or other combinations of two or more existing CSBG eligible entities only.

Under 5.3c, please only include two or more **previously designated** eligible entities that have merged or combined in order to provide CSBG services.

## SECTION 6: Organizational Standards for Eligible Entities

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

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

- ☒ COE CSBG Organizational Standards
- ☐ Modified Version of COE CSBG Organizational Standards
- ☐ Alternative Set of organizational standards

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

**6.1a. Modified Organizational Standards:** In the case that the state is requesting to use modified COE-developed organizational standards, provide the proposed modification for the FFY of this planning period including the rationale. [N/A](#)

**6.1b. Alternative Organizational Standards:** If using an alternative set of organizational standards, attach the complete list of alternative organizational standards. [N/A](#)

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

- ☐ There were no changes from the previous State Plan submission [N/A](#)  
Provide reason for using alternative [N/A](#)

Describe rigor compared to COE-developed Standards [N/A](#)

**6.2. Implementation:** Check the box that best describes how the state officially adopted organizational standards for eligible entities in a manner consistent with the state's administrative procedures act. If "Other" is selected, provide a timeline and additional information, as necessary.

- ☐ Regulation
- ☒ Policy
- ☒ Contracts with Eligible Entities
- ☐ Other, describe:

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

- ☐ Peer-to-Peer Review (with validation by the state or state-authorized third party)
- ☒ Self-Assessment (with validation by the state or state-authorized third party)
- ☐ Self-Assessment/Peer Review with State Risk Analysis
- ☐ State-Authorized Third-Party Validation
- ☒ Regular On-Site CSBG monitoring
- ☐ Other

**6.3a. Assessment Process:** Describe the planned assessment process. DCF will assess if each eligible entity is meeting the CSBG Organizational Standards through the on-site/virtual CSBG monitoring that it conducts at least once every three years. DCF will also conduct an annual desk review to assess each eligible entity against the Organizational Standards. This process requires eligible entities to first complete a self-assessment using DCF's CSBG Organizational Standards Desk Audit form and submit supporting documentation of compliance to DCF. DCF then reviews and validates each entity's compliance, the results of which are communicated to WISCAP, the eligible entities, and to OCS via the CSBG Annual Report.

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

**6.4. Eligible Entity Exemptions:** Will the state make exceptions in applying the organizational standards for certain eligible entities due to special circumstances or organizational characteristics (as described in IM 138)? ☒ Yes ☐ No

**GUIDANCE:** You will only need to respond to the following question if you responded "yes" to 6.4.

**6.4a.** Provide the specific eligible entities the state will exempt from meeting organizational standards and provide a description and a justification for each exemption. Total Number of Exempt Entities: 3

CSBG Eligible Entity	Description/Justification
Foundation for Rural Housing, Inc.	<p>DCF is exempting Foundation for Rural Housing, Inc. (FRH) from Organizational Standard 5.1, which requires a tripartite board of directors, and 5.2, which requires a democratic selection process for low-income board representatives.</p> <p>As a statewide limited purpose agency with an annual budget under \$500,000, the rationale for making an exception for FRH is that maintaining a tripartite board and putting a</p>

CSBG Eligible Entity	Description/Justification
	<p>statewide democratic selection process in place would put an undue burden on FRH. Furthermore, the agency has historically ensured that at least 50% of its board members are representatives from low-income communities.</p>
<p>United Migrant Opportunity Services/UMOS, Inc.</p>	<p>DCF is exempting United Migrant Opportunity Services/UMOS, Inc. (UMOS) from Organizational Standard 5.1, which requires a tripartite board of directors, and 5.2, which requires a democratic selection process for low-income board representatives.</p> <p>As a multi-state agency that uses CSBG funding for specific services targeted to Wisconsin's migrant and seasonal farmworker families, the rationale for exempting UMOs from these standards is that maintaining a tripartite, multi-state board of directors is not appropriate for this organization, which operates services in Kansas, Missouri, Minnesota, and Texas as well as Wisconsin. In addition, unlike a community action agency, UMOs does not weave CSBG funds throughout its agency, but instead uses these funds in a single program focused on the state's farmworkers. UMOs does maintain a tripartite CSBG Advisory Committee that is selected by its board of directors and focuses on planning and oversight for the CSBG-funded farmworker program. This committee does not have a democratic selection process in place for its low-income representatives, and DCF does not require this as doing so would create limited benefits relative to the resources such a process would require.</p>

CSBG Eligible Entity	Description/Justification
	DCF is also exempting UMOS from the requirement stated in CSBG Organizational Standard 9.4 that the IS Survey (now Annual Report) reflects organization-wide outcomes. The rationale for this exemption is that for a limited purpose agency, UMOS only uses CSBG funds for a single program, and as a large organization with services in multiple states, it is unreasonable to require UMOS to report all of its outcomes on the IS Survey (now Annual Report).
11 Wisconsin tribal organizations that receive discretionary CSBG funds	Consistent with guidance provided by OCS Information Memorandum 138, DCF will not apply the CSBG Organizational Standards to the 11 Wisconsin tribal organizations that receive discretionary CSBG funds as part of the Family Services Program (FSP) funding that DCF contracts to the tribes.

**6.5. Performance Target:** Provide the percentage of eligible entities that the state expects to meet all the state-adopted organizational standards for the FFY(s) of this planning period.  
**Year One 75%\_ Year Two 75%\_**

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

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

## SECTION 7: State Use of Funds

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

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

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

**7.1a. Formula Description:** Describe the current practice for allocating CSBG funds to eligible entities. The CSBG Act requires at least 90% of the CSBG funds be made available for grants for the purposes of CSBG, which is met through the allocations to our state's 18 eligible entities: 16 Community Action Agencies (CAAs), plus Foundation for Rural Housing (FRH) and UMOS.

The amount allocated for each Community Action Agency (CAA) is based on the percent of low-income individuals in the geographic area served by the CAA. DCF uses "Poverty Estimate All Ages" data from the U.S. Census Bureau, Small Area Income and Poverty Estimates (SAIPE) Program to calculate the percent of low-income individuals in each geographic area served by the CAA and updates its allocations decennially with the release of new census demographic data. The CAA receives the percentage of funding related to the percentage of low-income individuals covered by the CAA's service area.

In 2024, DCF allocated historic amounts of 4% of CSBG funds to UMOS, and 1.4% to FRH, based on a process established over twenty years ago. Combined with the CAA funding percentage, DCF passed through 92.87% of CSBG funding to eligible entities.

In 2025, DCF has made the change to retain more funding for administration costs. This is due to an identified deficit in admin over the last 5 years. Eligible entities will receive the pass through of 90% of funding as their base allocations. Any administration funding over and above what is needed can be re-distributed to eligible entities at the discretion of DCF.

**7.1b. Statute:** Does a state statutory or regulatory authority specify the formula for allocating "not less than 90 percent" funds among eligible entities? ☐ Yes ☒ No

- 7.2. Planned Allocation:** Specify the percentage of your CSBG planned allocation that will be funded to eligible entities and in accordance to the “not less than 90 percent funds” requirement as described under Section 675C(a) of the CSBG Act. In the table, provide the planned allocation for each eligible entity receiving funds for the fiscal year(s) covered by this plan. **Year One 92.87 % Year Two 90 %**

**Planned CSBG 92.87 Percent Funds – Year One**

<b>CSBG Eligible Entity</b>	<b>Funding Amount (\$)</b>
ADVOCAP, Inc.	\$356,198.51
CAP Services, Inc.	\$417,168.42
Central Wisconsin Community Action Council, Inc.	\$312,974.20
Community Action Coalition for South Central Wisconsin, Inc.	\$1,064,962.00
Community Action Inc. of Rock and Walworth Counties	\$409,547.18
Coulecap, Inc.	\$339,837.32
Indianhead Community Action Agency, Incorporated	\$199,131.08
Lakeshore CAP, Inc. of Wisconsin	\$279,608.56
Newcap, Inc.	\$677,157.54
North Central Community Action Program, Inc.	\$296,668.95
Northwest Wisconsin Community Services Agency, Inc.	\$163,136.46
Racine/Kenosha Community Action Agency, Inc.	\$558,461.99
Community Relations- Social Development Commission	\$2,190,539.75
Southwestern Wisconsin Community Action Program, Inc.	\$207,675.23
West Central Community Action Agency, Inc.	\$390,011.64
Western Dairyland Economic Opportunity Council, Incorporated	\$234,873.99
Foundation for Rural Housing, Inc.	\$129,331
United Migrant Opportunity Services/UMOS Inc.	\$369,517
<b>Total</b>	<b>\$8,579,263</b>

**Planned CSBG 90 Percent Funds – Year Two**

CSBG Eligible Entity	Funding Amount (\$)
ADVOCAP, Inc.	\$345,191.98
CAP Services, Inc.	\$404,277.92
Central Wisconsin Community Action Council, Inc.	\$303,303.30
Community Action Coalition for South Central Wisconsin, Inc.	\$1,015,058.48
Community Action Inc. of Rock and Walworth Counties	\$396,892.18
Couleecap, Inc.	\$ 329,336.35
Indianhead Community Action Agency, Incorporated	\$192,977.93
Lakeshore CAP, Inc. of Wisconsin	\$270,968.66
Newcap, Inc.	\$656,233.37
North Central Community Action Program, Inc.	\$287,501.88
Northwest Wisconsin Community Services Agency, Inc.	\$158,095.54
Racine/Kenosha Community Action Agency, Inc.	\$541,205.52
Community Relations- Social Development Commission	\$2,122,852.07
Southwestern Wisconsin Community Action Program, Inc.	\$201,258.09
West Central Community Action Agency, Inc.	\$377,960.28
Western Dairyland Economic Opportunity Council, Incorporated	\$227,616.38
Foundation for Rural Housing, Inc.	\$125,334.65
United Migrant Opportunity Services/UMOS Inc.	\$358,099.00
<b>Total</b>	<b>\$8,314,163.58</b>

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

**7.3. Distribution Process:** Describe the specific steps in the state’s process for distributing 90 percent funds to the eligible entities and include the number of days each step is expected to take. Please include information about state legislative approval or other types of administrative approval (such as approval by a board or commission). All eligible entities must submit an annual application to DCF outlining their plans for use of the CSBG funds and certifying that the agencies will comply with all federal and state requirements for CSBG grantees. DCF will send CSBG application forms to eligible entities on or before September 1, and completed applications are due back to DCF by October 1, in the year preceding the contract year, which begins on January 1.

The contract process begins once DCF approves an eligible entity’s annual CSBG application. DCF has a process through which the program staff, finance staff, budget staff, the division administrator, the Office of Legal Counsel, and the Secretary’s Office must review and approve the funding allocation plan and contract language. Once this



process is completed, DCF routes contracts electronically through DocuSign for execution, generally about 30 days before the start of the contract period. Signatories then have 60 days to sign contracts. This timeline is driven by the receipt of DCF's Notice of Award from OCS, which starts the process for each contract year.

DCF distributes CSBG funds to agencies on a reimbursement basis. Once the contract year is underway, agencies may submit claims for reimbursement by the 23<sup>rd</sup> day of the following month to be paid on the last day of that month. For instance, if an agency submits a reimbursement claim for January by the close of business on February 23, DCF will reimburse the agency on the last day of February. Agencies submit claims for reimbursement electronically using the DCF's cost reporting system, known as SPARC (System for Payments and Reports of Contracts).

The 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 23<sup>rd</sup> 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 Monthly Expenditure 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. It is not imperative that expenditures for a specific month be claimed within that month; they may be claimed on a subsequent month's expenditure report. The final expenditure report for the contract year is due within 60 days after the end of the grant period, which will occur on February 29, 2024, and March 1, 2025.

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.

**7.3a. Distribution Method:** Select the option below that best describes the distribution method the state uses to issue CSBG funds to eligible entities:

- ☒ Reimbursement
- ☐ Advance
- ☐ Hybrid
- ☐ Other

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

☒ Yes ☐ No

**7.4a. Distribution Consistency:** If no, describe state procedures to ensure funds are made available to eligible entities consistently and without interruption. [N/A](#)

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

**7.5. Distribution of Funds Performance Management Adjustment:** Describe the state's strategy for improving grant and/or contract administration procedures under this State Plan as

compared to past plans. Any improvements should be based on analysis of past performance and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any improvements, provide further detail. Every quarter DCF monitors the Key Performance Indicator (KPI) of contract timeliness. Although the department's contracts were signed before the contract start date, the department still has room for improvement. If a contract is not signed timely (prior to the contract start date), this could cause a gap in service, which negatively impacts our programs and ultimately the children and families we serve. A Contract Timeliness Continuous Improvement Project was launched with the purpose of identifying areas of improvement around timely contract signing. The project kicked off in 2021 with a survey for DCF's contract administrators to better understand any barriers they are facing related to contract timeliness and to identify other ways to support these efforts.

DCF finalized the revised CSBG Policy and Procedures Manual, which has been updated based on feedback from the eligible entities, OCS, and other sources, and is incorporated by reference and content into subsequent State Plans. DCF created an outline of the changes in the updated CSBG Policy and Procedures Manual.

DCF is continually exploring other ways to allocate funds. Currently, we are allocating the percentage of the poverty level in each region.

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

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

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

**Year One** 1.86 %      **Year Two** 5%

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

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

**Year One** 3      **Year Two** 3

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

**Year One** 1.55      **Year Two** 1.55

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

- 7.9. Remainder/Discretionary Funds Use: Does the state have remainder/discretionary funds as described in Section 675C(b) of the CSBG Act? ☒ Yes ☐ No

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

If yes, provide the allocated percentage and describe the use of the remainder/discretionary funds in the table below. **Year One 5.27%** **Year Two 5%**

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

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

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

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

#### Use of Remainder/Discretionary Funds – Year One and Two

Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
7.9a. Training/Technical Assistance to eligible entities	\$64,000.00	These planned services/activities will be described in State Plan Item 8.1 <a href="#">[Read-Only]</a>
7.9b. Coordination of state-operated programs and/or local programs	\$0.00	These planned services/activities will be described in State Plan Section 9, State Linkages and Communication <a href="#">[Read-Only]</a>
7.9c. Statewide coordination and communication among eligible entities	\$27,000.00	These planned services/activities will be described in State Plan Section 9, State Linkages and Communication <a href="#">[Read-Only]</a>
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need (Briefly describe under Column 4)	\$0.00	
7.9e. Asset-building programs (Briefly describe under Column 4)	\$0.00	
7.9f. Innovation programs/activities	\$0.00	

Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
by eligible entities or other neighborhood groups (Briefly describe under Column 4)		
7.9g. State Charity tax credits (Briefly describe under Column 4)	\$0.00	
7.9h. Other activities (Specify these other activities under Column 4)	\$362,374.00	<p>Wisconsin allocates 4% of the CSBG funding to the state's 11 federally recognized Indian tribes. This funding is included as part of the Family Services Program (FSP) funding the state provides to the tribes. FSP funds can be used for a wide range of human services, including:</p> <ul style="list-style-type: none"> <li>• Domestic abuse intervention;</li> <li>• Child welfare programs;</li> <li>• Initiatives that empower low-income individuals, families, and communities to overcome the effects of poverty;</li> <li>• Adolescent pregnancy prevention and parenting skills programs for adolescent parents; and</li> <li>• Childcare.</li> </ul> <p>Each tribe has the flexibility to include and emphasize the services that will meet the need of individual families and the tribal community.</p>
<b>Totals</b>	<b>\$475,374.00</b>	

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

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

- ☐ The State Directly Carries Out All Activities (No Partnerships)
- ☐ The State Partially Carries Out Some Activities
- ☐ CSBG Eligible Entities (if checked, include the expected number of CSBG eligible entities to receive funds)

- ☐ Other Community-based Organizations
- ☒ State Community Action Association
- ☐ Regional CSBG Technical Assistance Provider(s)
- ☐ National Technical Assistance Provider(s)
- ☐ Individual Consultant(s)
- ☒ Tribes and Tribal Organizations
- ☐ Other

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

**7.11. Use of Remainder/Discretionary Funds Performance Management Adjustment:**

Describe any adjustments the state will make to the use of remainder/discretionary funds under this State Plan as compared to past State Plans? Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

There hasn't been any further adjustment on the use of the remainder/discretionary funds for performance management. Any remaining administrative funding may be passed through to either WISCAP for additional T/TA dollars or to eligible entities to apply for scholarships for additional trainings or innovative projects.

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

## SECTION 8: State Training and Technical Assistance

- 8.1. Training and Technical Assistance Plan:** Describe the state’s plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan by completing the table below. The T/TA plan should include all planned CSBG T/TA activities funded through the administrative or remainder/discretionary funds of this CSBG award (as reported in Section 7). The CSBG T/TA plan should include training and technical assistance conducted directly by the state or through partnerships (as specified in 8.3). Add a row for each activity: indicate the timeframe; whether it is training, technical assistance, or both; and the topic.

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

**Training and Technical Assistance – Year One and Two**

Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
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Ongoing / Multiple Quarters	Technical Assistance	Fiscal	N/A
Ongoing / Multiple Quarters	Both	Governance/Tripartite Boards	N/A
All Quarters	Technical Assistance	Organizational Standards – General	N/A
Ongoing / Multiple Quarters	Technical Assistance	Organizational Standards – technical assistance for eligible entities with unmet standards	N/A
Ongoing / Multiple Quarters	Training	Reporting	N/A
Ongoing / Multiple Quarters	Training	ROMA	N/A
Ongoing / Multiple Quarters	Both	Community Assessment	N/A
Ongoing / Multiple Quarters	Technical Assistance	Strategic Planning	N/A
Ongoing / Multiple Quarters	Both	Monitoring	N/A
Ongoing / Multiple Quarters	Technical Assistance	Communication	N/A
Ongoing / Multiple Quarters	Technical Assistance	Technology	N/A

**8.1a. Training and Technical Assistance Budget:** The planned budget for all training and technical assistance:

Year One \$81,000 Year Two \$81,000

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

DCF contracts with Wisconsin Community Action Program Association (WISCAP) to define and specify the delivery mechanism of training and technical assistance needs for the state's CSBG eligible entities. These needs are reviewed and approved by the WISCAP board of directors on an annual basis and incorporated in WISCAP's contractual Work Plan with DCF. DCF meets with WISCAP on a monthly basis to plan the delivery of training and technical assistance identified within the state and receives monthly activity reports on the status of task in WISCAP's Work Plan.

**8.2. Organizational Standards Technical Assistance:** Does the state have Technical Assistance Plans (TAPs) in place for all eligible entities with unmet organizational standards, if appropriate? ☒ Yes ☐ No

**Note:** 8.2 is associated with State Accountability Measure 6Sb. The state should put a TAP in place to support eligible entities with one or more unmet organizational standards.

**8.2a. Address Unmet Organizational Standards:** Describe the state's plan to provide T/TA to eligible entities to ensure they address unmet Organizational Standards. DCF will put eligible entities with unmet Organizational Standards on a Technical Assistance Plan (TAPs), if appropriate. 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.

**8.3. Training and Technical Assistance Organizations:** Indicate the types of organizations through which the state intends to provide training and/or technical assistance as described in Item 8.1, and briefly describe their involvement. (Check all that apply.)  
**[Check all that applies and narrative where applicable]**

- ☐ All T/TA is conducted by the state
- ☐ CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds)
- ☐ Other community-based organizations
- ☒ State Community Action Association
- ☐ Regional CSBG technical assistance provider(s)
- ☐ National technical assistance provider(s)
- ☐ Individual consultant(s)
- ☐ Tribes and Tribal Organizations
- ☐ Other

**8.4. CSBG-Funded T/TA Performance Management Adjustment:** Describe adjustments the state made to the training and technical assistance plan under this State Plan as compared to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other



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

DCF currently offers training and technical assistance related to ROMA for CSBG eligible entities and their board members under the FY22-23 State Plan and is not making any further adjustments under this State Plan.

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

## SECTION 9: State Linkages and Communication

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

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

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

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

- 9.2. State Linkages and Coordination at the Local Level:** Describe how the state is encouraging partnerships and collaborations at the state level with public and private sector organizations, to assure the effective delivery and coordination of CSBG services to transform low-income communities and avoid duplication of services (as required by assurances under Section 676(b)(5) – (6)).

As part of the State's CSBG monitoring process, DCF requires each eligible entity to provide evidence that it has strong collaborative relationships with local governmental and other social service organizations, especially antipoverty programs in the community. In 2022, Wisconsin launched a TANF Advisory Committee and invited a representative from Community Action to be on the committee to ensure collaboration and open communication between the two programs occurred. In addition, the Department of Children and Families created a Child Support Liaison position, in hopes to serve those who would not be eligible for TANF due to not having custody of their child. This position's mission is to connect non-custodial parents to government funded programs, including programs run by our eligible entities.

DCF will work with eligible entities to identify the local and regional anti-poverty networks in which they participate with, in order for DCF to gain a greater understanding of the linkages and collaborations that exist across the state. The CSBG contract manager or other designated DCF staff in lieu of the contract manager will attend four of these local and regional network meetings each year.

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

### **9.3. Eligible Entity Linkages and Coordination**

**9.3a. State Assurance of Eligible Entity Linkages and Coordination:** Describe how the state will assure that eligible entities will partner and collaborate with public and private sector organizations to assure the effective delivery and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by the assurance under Section 676(b)(5)).

As part of the state's CSBG monitoring process, DCF requires each eligible entity to provide evidence that it has strong collaborative relationships with other antipoverty organizations in its community. In Wisconsin, CSBG funds are a critical resource for convening and facilitating community-based discussion about local challenges and effective solutions for low-income families. In communities across the state, eligible entities host or participate in work groups, coordinated community responses, professional organizations, councils, task forces, civic groups, and other forums that actively work towards improved outcomes for people in need. This activity generally results in more effective planning and service delivery in addition to new program development to address identified service gaps. It also ensures that services are not duplicated within local communities. In many cases, collaboration may secure more resources, such as in-kind donations, volunteer time, and corporate support. Collaboration may also lead to greater community awareness of the problems of low-income individuals and families. Schools, churches, county human service agencies such as the Public Health Department and ADRC, and other recognized community institutions often provide a significant volume of referrals to eligible entities and rely on eligible entities' responsiveness to meet the urgent and emergent needs of the families they serve.

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

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

All of the CSBG providers in Wisconsin actively engage in outreach strategies. Some agencies have staff onsite at job centers, family resource centers, and

other locations where people in need can access multiple services more efficiently. Eligible entities provide in-services and training for referral sources. All have web sites and provide brochures and program information at key contact sites in their communities. Agencies also actively seek information that would help them more effectively identify and engage families; examples include the use of energy assistance lists by the state's weatherization programs, and the use of food pantries and Head Start programs to recruit low-income board and committee members and engage volunteer support. DCF will also invite representation from eligible entities to speak about programs during various meetings, to ensure collaboration between programs can occur without a duplicate of services.

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

**9.4. Workforce Innovation and Opportunity Act (WIOA) Employment and Training**

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

☐ Yes ☒ No

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

**9.4a. WIOA Combined Plan:** If the state selected yes under Item 9.4, provide the CSBG-specific information included in the state's WIOA Combined Plan. This information includes a description of how the state and the eligible entities will coordinate the provision of employment and training activities through statewide and local WIOA workforce development systems. This information may also include examples of innovative employment and training programs and activities conducted by community action agencies or other neighborhood-based organizations as part of a community antipoverty strategy. [N/A](#)

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

the WIOA system. [Among Wisconsin's eligible entities, several have management staff that are members of regional Workforce Development Boards, two have staff stationed at regional Job Centers, two more receive WIOA funding to operate Job Centers, and four agencies receive WIOA funding to provide adult and/or youth employment services.](#)

[DCF has several representatives serving on the Wisconsin Department of Workforce Development's Job Center Task Force to assess the current state of the Wisconsin Job Center system related to effective program coordination and bring forth recommendations to the Job Center Task Force for future](#)

improvements by investigating best practices, recommending actions and policies, and identifying tools. The Task Force will also leverage statewide workforce and work support programs through effective use of physical locations, staff, joint policies/guidelines, technology, and resource sharing including identifying gaps, as well as evaluate funding sources and ways to leverage resources to support a seamless and comprehensive delivery of services to customers that leads to improved employment and training outcomes.

**9.5. Emergency Energy Crisis Intervention:** Describe how the State will assure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to Low-Income Home Energy Assistance) are conducted in each community in the State, as required by the assurance under Section 676(b)(6) of the CSBG Act). Wisconsin Department of Administration (DOA) administers the federally funded Low Income Home Energy Assistance Program (LIHEAP) and the Public Benefits Energy Assistance Program, which is funded through fixed charges on electric utility customers. This umbrella coverage is named Wisconsin Home Energy Assistance Program (WHEAP). Five CSBG eligible entities operate LIHEAP. LIHEAP and its related services help approximately 230,000 Wisconsin households annually. In addition to regular heating and electric assistance, specialized services include:

- Emergency fuel assistance;
- Counseling for energy conservation and energy budgets;
- Pro-active copayment plans;
- Targeted outreach services; and
- Emergency furnace repair and replacement.

Services are provided locally through:

- County human services offices;
- Tribal governments; and
- Private non-profit or other government agencies, including four CSBG eligible entities that serve as sub-contractors for county governments.

DOA also administers the state's Weatherization Assistance Program (WAP). Twelve CSBG eligible entities operate weatherization services under this program. They all have access to the statewide database listing recipients of energy assistance, and routinely reach out to those households to offer weatherization services as appropriate.

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

**9.6. Faith-based Organizations, Charitable Groups, and Community Organizations:** Describe how the state will assure local eligible entities will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations, according to the state's assurance under Section 676(b)(9) of the CSBG Act.

As part of the state's CSBG monitoring process, DCF requires each eligible entity to provide evidence that it coordinates and forms partnerships with other organizations, including faith-based organizations, charitable groups, and other community organizations. DCF also requires eligible entities to report information about their partnerships on the annual application for CSBG funds and the CSBG Annual Report.

On the 2022 CSBG Annual Report, Wisconsin's eligible entities reported that they worked with a total of 326 faith-based organizations and 1,153 non-profit organizations. In addition, they reported working with 255 school districts and 1,259 for-profit businesses.

In FFYs 2024 and 2025, Wisconsin's eligible entities will continue collaborating with large numbers of other local organizations, and DCF will continue to assist in the coordination of these collaborations as able.

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

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

Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act. Wisconsin's eligible entities coordinate CSBG funds with a wide variety of other funding. They access additional federal and state grant resources that support Head Start; weatherization; housing assistance and development; employment and training programs; and emergency food services. Agencies also have garnered the ongoing financial support of United Way, community foundations, and other local philanthropic organizations and individuals. In some counties, municipal and/or county governments contract with eligible entities to provide services. On the 2022 Annual Report, the eligible entities reported that they administered over \$306.2M in leveraged funds. CSBG funds represented only 4.5% of the eligible entities' total funds in 2022; however, its flexibility is vital to the entities' ability to provide required match for other funds, respond to new needs that arise in their communities, and support innovative community-wide collaborations.

A keyway that many eligible entities use CSBG in coordination with other resources is as required match for two important U.S. Department of Housing and Urban Development (HUD) programs that support services for the homeless and households that are at-risk of becoming homeless. These are:

1. The Emergency Solutions/Transitional Shelter/Homeless Prevention (ETH) grants, administered by the Wisconsin Department of Administration, Division of Housing, Energy, and Community Resources and used for emergency shelters for the

- homeless, eviction prevention, rapid re-housing, and transitional housing assistance; and
- 2. HUD Continuum of Care funding which supports community-wide responses to homelessness.

The Foundation for Rural Housing also uses CSBG funds to cover staffing and other expenses necessary for the operation of the state-funded Critical Assistance program, which supports homelessness prevention services for rural areas of the state.

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

**9.8. Coordination among Eligible Entities and State Community Action Association:** Describe state activities for supporting coordination among the eligible entities and the State Community Action Association.

DCF reserves a portion of its discretionary CSBG funding to support quarterly meetings and the Annual Conference of the statewide community action network that are convened by WISCAP. These meetings provide an opportunity for the eligible entities' executive directors and other leadership staff to meet, discuss issues of common concern, and receive updates from representatives from DCF and other state departments that provide funding to the eligible entities.

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

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

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

**Communication Plan**

Subject Matter	Expected Frequency	Format	Brief Description of "Other"
Upcoming Public and/or Legislative Hearings	Biannually, as-needed	Public notice and/or email	N/A
State Plan Development	Biannually, as-needed, upon request	Meetings/presentations, email, phone calls, public notice	N/A
Organizational Standards Progress	Annually, as-needed	Meetings/presentations, email, phone calls	N/A
State Accountability Measures Progress	Annually, as-needed	Meetings/presentations, email	N/A
Community Needs Assessments/Community Action Plans	Annually, as-needed	Meetings/presentations, email, 1:1, phone calls	N/A

Subject Matter	Expected Frequency	Format	Brief Description of "Other"
State Monitoring Plans and Policies	Annually, as-needed, upon request	Meetings/presentations, email, 1:1, phone calls	N/A
Training and Technical Assistance (T/TA) Plans	Quarterly, as-needed, upon request	Meetings/presentations, email, website, webinar, 1:1, phone calls, letters/hard copies	N/A
ROMA and Performance Management	Annually	Meetings/presentations, email, website, webinar, 1:1, phone calls	N/A
State Interagency Coordination	As-needed	Meetings/presentations, email, phone calls	N/A
CSBG Legislative/Programmatic Updates	Monthly	Meetings/presentations, email	N/A
Tripartite Board Requirements	Quarterly, as-needed	Meetings/presentations, email, 1:1, phone calls	N/A

**9.10. Feedback to Eligible Entities and State Community Action Association:** Describe how the state will provide information to local entities and State Community Action Associations regarding performance on State Accountability Measures. When DCF receives feedback from OCS regarding the State's performance on State Accountability Measures, the CSBG contract manager will forward the report from OCS to the eligible entities and WISCAP within 60 calendar days. In addition to sharing the State's performance data with the eligible entities and WISCAP, DCF will also provide information about any actions DCF plans to take in order to improve the state's performance.

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

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

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

DCF will continue a coordinated monthly meeting with WISCAP staff related to the eligible entities' training and technical assistance needs. DCF has engaged WISCAP in more intensive joint planning for T/TA for the eligible entities in an effort to increase collaboration and build a stronger T/TA partnership for Wisconsin's eligible entities. DCF sees a benefit to holding calls, in-person meetings, or, at minimum, email exchanges on



at least a monthly basis, in addition to WISCAP providing regular detailed reports to DCF for the T/TA activities it provides under its CSBG-funded contract with DCF.

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

## SECTION 10: Monitoring, Corrective Action, and Fiscal Controls

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

- 10.1.** Specify the proposed schedule for planned monitoring visits including: full on-site reviews; on- site reviews of newly designated entities; follow-up reviews – including return visits to entities that failed to meet state goals, standards, and requirements; and other reviews as appropriate.

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

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

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

#### Monitoring Schedule – Year One

CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of “Other”
<i>ADVOCAP</i>	Desk Review	Desk Review	FY1 Q2	11/07/2022	11/23/2022	
<i>CAP Services</i>	Full On-Site	Onsite/Desk Review	FY1 Q4	3/27/2024	4/15/2024	
<i>Central Wisconsin Community Action Council</i>	Desk Review	Desk Review	FY1 Q2	1/11/2024	2/1/2024	
<i>Community Action Coalition for South Central Wisconsin</i>	Full On-Site	Onsite/Desk Review	FY1 Q1	9/19/2023	10/16/2023	
<i>Community Action Inc. of Rock &amp; Walworth</i>	Desk Review	Desk Review	FY1 Q2	01/25/2022	3/08/2022	
<i>Coulecap</i>	Full On-Site	Onsite/Desk Review	FY1 Q3	9/9/2024	10/2/2024	
<i>Indianhead</i>	Desk Review	Desk Review	FY1 Q2	06/29/2023	8/8/2023	
<i>Lakeshore CAP</i>	Full On-Site	Onsite/Desk Review	FY1 Q2	8/27/2024	9/27/2024	
<i>NEWCAP</i>	Desk Review	Desk Review	FY1 Q2	06/13/2022	8/16/2022	

<i>North Central Community Action</i>	Desk Review	Desk Review	FY1 Q2	07/25/2023	8/2/2023	
<i>Northwest Wisconsin Community Services Agency</i>	Full On-Site	Onsite/Desk Review	FY1 Q4	07/22/2024	8/22/2024	
<i>Racine/Kenosha Community Action Agency</i>	Full On-Site	Onsite/Desk Review	FY1 Q4	04/29/2024	5/29/2024	
<i>Social Development Commission</i>	Desk Review	Desk Review	FY1 Q2	09/12/2023	10/12/2023	
<i>Southwestern Wisconsin CAP</i>	Desk Review	Desk Review	FY1 Q2	1/29/2024	2/13/2024	
<i>West Central Community Action Agency</i>	Desk Review	Desk Review	FY1 Q2	7/23/2024	8/23/2024	
<i>Western Dairyland Economic Opportunity Council</i>	Full On-Site	Onsite/Desk Review	FY1 Q1	10/10/2023	10/18/2023	
<i>Foundation for Rural Housing</i>	Desk Review	Desk Review	FY1 Q2	05/12/2022	11/11/2022	
<i>United Migrant Opportunity Services</i>	Desk Review	Desk Review	FY1 Q2	09/12/2023	10/6/2023	

#### Monitoring Schedule – Year Two

CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of "Other"
<i>ADVOCAP</i>	Full On-Site	Onsite/Desk Review	FY2 Q4	11/07/2022	11/23/2022	
<i>CAP Services</i>	Desk Review	Desk Review	FY2 Q2	3/27/2024	4/15/2024	
	Desk Review	Desk Review	FY2 Q2	1/11/2024	2/1/2024	

<b>Central Wisconsin Community Action Council</b>	Desk Review	Desk Review	FY2 Q2	9/19/2023	10/16/2023	
<b>Community Action Coalition for South Central Wisconsin</b>	Full On-Site	Onsite/Desk Review	FY2 Q2	01/25/2022	3/08/2022	
<b>Community Action Inc. of Rock &amp; Walworth</b>	Desk Review	Desk Review	FY2 Q2	9/9/2024	10/2/2024	
<b>Couleecap</b>	Desk Review	Desk Review	FY2 Q2	06/29/2023	8/8/2023	
<b>Indianhead</b>	Desk Review	Desk Review	FY2 Q2	8/27/2024	9/27/2024	
<b>Lakeshore CAP</b>	Full On-Site	Onsite/Desk Review	FY2 Q3	06/13/2022	8/16/2022	
<b>NEWCAP</b>	Desk Review	Desk Review	FY2 Q2	07/25/2023	8/2/2023	
<b>North Central Community Action</b>	Desk Review	Desk Review	FY2 Q2	07/22/2024	8/22/2024	
<b>Northwest Wisconsin Community Services Agency</b>	Desk Review	Desk Review	FY2 Q2	04/29/2024	5/29/2024	
<b>Racine/Kenosha Community Action Agency</b>	Desk Review	Desk Review	FY2 Q2	09/12/2023	10/12/2023	
<b>Social Development Commission</b>	Full On-Site	Onsite/Desk Review	FY2 Q4	1/29/2024	2/13/2024	
<b>Southwestern Wisconsin CAP</b>	Full On-Site	Onsite/Desk Review	FY2 Q1	7/23/2024	8/23/2024	
<b>West Central Community Action Agency</b>	Desk Review	Desk Review	FY2 Q2	10/10/2023	10/18/2023	
<b>Western Dairyland Economic</b>						

<i><b>Opportunity Council</b></i>	Full On-Site	Onsite/Desk Review	FY2 Q3	05/12/2022	11/11/2022	
<i><b>Foundation for Rural Housing</b></i>	Desk Review	Desk Review	FY2 Q2	09/12/2023	10/6/2023	
<i><b>United Migrant Opportunity Services</b></i>						

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

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

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

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



DCF CSBG Policy  
Manual\_FINAL\_v2\_4.

**10.3. Initial Monitoring Reports:** According to the state’s procedures, by how many calendar days must the state disseminate initial monitoring reports to local entities? [30](#)

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

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

**10.4. Closing Findings:** Are state procedures for addressing eligible entity findings/deficiencies and the documenting closure of findings included in the state monitoring policies attached under 10.2? ☐ Yes ☒ No

**10.4a. Closing Findings Procedures:** If no, describe state procedures for addressing eligible entity findings/deficiencies and the documenting closure of findings. If DCF determines through an on-site monitoring visit that 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 30 days of the monitoring review. The monitoring report will document the basis for DCF’s determination, and the agency will be asked to develop and propose a plan and timeline within 60 days to address the issues identified in the monitoring report. This plan must identify the actions that the agency will take to correct the deficiency within a reasonable period. Alternately, the agency may provide documentation that corrections have already been made, and therefore further corrective action is not needed for the issue(s) in question.

DCF will have 30 days to either approve the agency’s proposed plan or specify the reasons why the proposed plan cannot be approved. In alignment with guidance from CSBG Information Memorandum 138 (State Establishment of Organizational Standards for CSBG Eligible Entities under 678B of the CSBG Act, 42 U.S.C. § 9914), DCF will work with the eligible entity to develop a Technical Assistance Plan (TAP) around CSBG requirements that the eligible entity can meet in a reasonable time frame with targeted

technical assistance. For circumstances in which an eligible entity needs more intensive work to meet CSBG requirements and has serious deficiencies that threaten its status as a CSBG eligible entity, DCF will work with the eligible entity to establish a Quality Improvement Plan (QIP) that lays out clear timelines and benchmarks for progress. DCF will offer training and assistance as appropriate to help the agency correct deficiencies. If an agency fails to make progress on a QIP, DCF will follow the process outlined in Section 678C of the CSBG Act and the guidelines provided in CSBG Information Memorandum 116 (Corrective Action, Termination, or Reduction of Funding).

- 10.5. Quality Improvement Plans (QIPs):** Provide the number of eligible entities currently on QIPs, if applicable. [1](#)

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

**10.6. Reporting of QIPs:** Describe the state's process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the state approving a QIP? Once a QIP is established for an eligible entity and approved by DCF, DCF will send an email to OCS staff within 30 calendar days to report that the QIP is in place. DCF will follow guidance provided by OCS in terms of reporting the specific CSBG requirements addressed by the QIP and providing follow-up reports of the eligible entity's progress in meeting these requirements.

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

- 10.7. Assurance on Funding Reduction or Termination:** The state assures that "any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the state determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b)" per Section 676(b)(8) of the CSBG Act. ☒ Yes ☐ No

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

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

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

**10.8a. New Designation Citation:** If yes, provide the citation(s) of the law and/or regulation. [Wis. Stat. ss. 49.265\(2\)\(a\)1.b. to 49.265\(2\)\(a\)1.c.](#) state that a community action agency must receive "the approval of the secretary" of DCF and "the approval of the county board of supervisors, if the community action agency serves an entire county, or, if the agency serves a city, village or town, receives the approval of the city's, village's or town's legislative body."

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

**10.9. Eligible Entity Termination:** Does the state CSBG statute and/or regulations provide for termination of eligible entities? ☒ Yes ☐ No

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

DCF would begin the process of de-designating an eligible entity only if an entity 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 assessment, 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 corrective action planning process, has been identified as “high risk”, and has had the opportunity to develop and implement a Quality Improvement Plan (QIP). DCF would notify OCS within five business days in the event that it had identified an eligible entity as high risk. DCF would only begin the process of de-designating a high-risk agency if it failed to cooperate with DCF and did not develop a QIP or make progress on its approved QIP.

In alignment with Section 678(b)(8) of the CSBG Act and Wis. Stat. s. 49.625(2)(c), DCF would only de-designate an eligible entity through a joint decision by both the legislative body of the county, city, village, or town that originally designated the eligible entity and DCF. 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 the Department of Health and Human Services (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 DHHS 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.



**10.9b. Termination Procedures:** If no, describe state procedures for termination of new eligible entities and how the procedures were made available to eligible entities and the public. [N/A](#)

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

**10.10a. Re-Designation Citation:** If yes, provide the citation(s) of the law and/or regulation. [N/A](#)

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

[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 first request an existing Community Action Agency \(CAA\) that is located and provides services in a contiguous county to serve the unserved county. If no existing CAA is located in a contiguous county, a request will be made to the CAA located within the closest proximity, or another existing CAA within reasonable proximity to the unserved county.](#)

[If DCF decides to serve a county not currently served by a CAA, the CSBG contract manager may convene a meeting with the representatives of the county, the Wisconsin Community Action Program Association, and any existing CAAs that are interested in becoming the CAA for the county.](#)

[An existing CAA interested in becoming the CAA for the county and representatives of the county must submit a joint letter of intent by the date designated by DCF to be eligible for funding in that county during the next year. DCF will adjust the resource allocation in the next CSBG State Plan. The CAA must include a plan and budget for the county in its annual CSBG application. The plan must include specific activities that will occur in the county. The plan also must include a resolution from the county board designating the agency as the CAA provider in that county.](#)

[If existing CAAs decline to serve the unserved county, the creation of a new CAA is possible under Wis. Stat. s. 49.625\(2\). Such an entity would be a private nonprofit organization that is geographically located in the area or in an area contiguous to, or within reasonable proximity to, the unserved area and is capable of meeting all requirements of the CSBG program. DCF would solicit applications from interested organizations through a Request for Proposal process. The board of supervisors for the unserved county would need to approve a resolution to designate the agency as the CAA for that county.](#)

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.

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

### **Fiscal Controls and Audits and Cooperation Assurance**

**10.11. Fiscal Controls and Accounting:** Describe how the state's fiscal controls and accounting procedures will a) permit preparation of the SF-425 Federal fiscal reports (FFR) and b) permit the tracing of expenditures adequate to ensure funds have been used appropriately under the block grant, as required by Block Grant regulations applicable to CSBG at 45 CFR 96.30(a).

When any federal award is received, DCF finance staff establishes several reporting categories specific to that award in the general ledger of the state's financial system. These reporting categories segregate state disbursements by recipient type and by expenditure type. Administrative expenses are accumulated in a separate account and monitored to ensure that they do not exceed the maximum 5% administrative cap established by the CSBG Act.

Eligible entities receive disbursement of their funding after reporting expenditures through a separate payment system. Eligible entities report their expenditures by defined categories, identifying when expenditures were made. This payment system tracks activity by eligible entity and expenditure type, with built-in caps to prevent eligible entity payments from exceeding the contract award. It also maintains historical data which can be queried. The CSBG contract manager uses this data to track funding usage by eligible entity to ensure awards are being fully utilized. DCF finance staff prepares journal entries for funds distribution from this payment system and post the journal entries to the state's general ledger.

Each eligible entity is required to have an annual audit to ensure that grant funds received have been used according to the federal statutes, regulations, and terms and

conditions of the award.

DCF finance staff prepares reports periodically to review disbursement of grants. Expenditures are sorted by date to ensure that only items properly obligated by the end of the award period and liquidated within 90 days of that date are reported on the final SF-425 Federal fiscal report. Only items liquidated by the reporting date are included in interim reports.

- .12. Single Audit Management Decisions:** Describe state procedures for issuing management decisions for eligible entity single audits, as required by Block Grant regulations applicable to CSBG at 45 CFR 75.521.

All of the eligible entities operate on a calendar year basis, with their audits covering the period of January 1, through December 31; except for one agency that operates on a July 1, through June 30, fiscal year. Each eligible entity is required by DCF contract to annually submit a copy of its single audit by six months after the end of its fiscal year. The single audits must be conducted by an independent accounting firm in accordance with generally accepted accounting principles.

The eligible entities' audits are collected and reviewed by DCF finance staff. If the auditor indicated that a management letter was issued, DCF finance staff request the management letter if it is not included in the original reporting package. DCF finance staff note any audit findings or management letter comments on their desk review checklist. DCF finance staff review the management response/corrective action plan to determine if it appears adequate to address the finding(s). If applicable, DCF finance staff also review prior year findings to determine if the corrective action plan from the prior year has been put into place.

DCF finance staff notifies the CSBG contract manager of any findings and proposed corrections. The CSBG contract manager contacts the eligible entity (if necessary) to clarify proposed action or confirm that the corrective action was completed as scheduled. DCF finance staff also document any additional follow-up considered necessary. The eligible entity's response to DCF finance staff is shared with the CSBG contract manager to verify that all concerns have been adequately addressed.

Once all findings are adequately addressed, DCF finance staff sends a close-out letter to the eligible entity stating acceptance of the audit reporting package and closing DCF's interest in the audit. Any funds due back based on audit findings would be requested through this letter. If a return of funds is requested, a Notice of Appeal rights is also included.

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

**10.13. Assurance on Federal Investigations:** The state will “permit and cooperate with Federal investigations undertaken in accordance with Section 678D” of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act. ☒ Yes ☐ No

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

**10.13a. Federal Investigations Policies:** Are state procedures for permitting and cooperating with federal investigations included in the state monitoring policies attached under 10.2? ☒ Yes ☐ No

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

DCF is in the process of making adjustments to its monitoring procedures, for review and comment from CSBG eligible entities, OCS, and other sources. However, DCF is currently still in the initial drafting phase of new procedures so will not be implementing such adjustments concurrent with this State Plan.

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

## SECTION 11: Eligible Entity Tripartite Board

**11.1. Tripartite Board Verification:** Verify which of the following measures are taken to ensure that the state verifies CSBG eligible entities are meeting Tripartite Board requirements under Section 676B(a)(2) of the CSBG Act.

- ☒ Attend Board meetings
- ☒ Organizational Standards Assessment
- ☒ Monitoring
- ☒ Review copies of Board meeting minutes
- ☒ Track Board vacancies/composition
- ☐ Other

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

- ☐ Annually
- ☐ Semiannually
- ☒ Quarterly
- ☐ Monthly
- ☐ As It Occurs
- ☐ Other

**11.3. Tripartite Board Representation Assurance:** Describe how the states will verify that eligible entities have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entity's Tripartite Board as required by the assurance under Section 676(b)(10) of the CSBG Act. *As part of the State's CSBG monitoring process, DCF requires each eligible entity to provide evidence that it has policies and procedures in place by which individuals or organizations can petition for adequate representation on the eligible entity's board. Eligible entities typically meet this requirement by having a policy and procedure outlined in their bylaws. If an eligible entity fails to meet this requirement, this would result in a finding in the CSBG monitoring report. DCF would then require the eligible entity to develop a Corrective Action Plan within 60 days that shows how the eligible entity will resolve the finding within a reasonable timeframe (i.e., 12 months or less) by formally adopting a policy and procedures by which individuals or organizations can petition for adequate representation on its board. DCF will provide technical assistance as needed.*

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

**11.4. Tripartite Board Alternative Representation:** Does the state permit public eligible entities to use, as an alternative to a Tripartite Board, "another mechanism specified by the state to assure decision-making and participation by low-income individuals in the

development, planning, implementation, and evaluation of programs” as allowed under Section 676B(b)(2) of the CSBG Act? ☐ Yes ☒ No

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

## SECTION 12: Individual and Community Income Eligibility Requirements

**12.1. Required Income Eligibility:** Provide the income eligibility threshold for services in the state.

- ☒ 125% of the HHS poverty line
- ☐ X % of the HHS poverty line (fill in the threshold): \_\_\_\_\_%
- ☐ Varies by eligible entity

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

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

Individuals and families receiving CSBG supported services must have incomes at or below 125% of the federal poverty level, as defined by the federal Office of Management and Budget (OMB). CSBG recipient and sub-recipient agencies are required to conduct eligibility screenings as part of their client intake process. Agencies must have written policies and procedures for each program they administer that uses CSBG funds to ensure that 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% of the federal poverty level upon intake into the program, the individual (or family) is eligible to continue receiving services until the agency conducts a formal reassessment.

CSBG eligibility is based on household income. A household is defined as all individuals living within the same household who are related to one another by birth or marriage. The gross (pre-tax) income of all individuals in the household must be counted in order to assess eligibility for CSBG services.

Often agencies support a single program by combining CSBG dollars with funds from other sources that have different income eligibility requirements from the CSBG program. In these cases, those served must be screened for CSBG eligibility and identified as CSBG-eligible or not CSBG-eligible. Agencies must use proportional ratios to demonstrate client eligibility tied to funding streams. For example, if CSBG supports 30% of a program's costs, then the agency must be able to demonstrate that at least 30% of the clients served have incomes at or below 125% of the federal poverty level.

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% of the federal poverty level. 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.

- 12.2. Income Eligibility for General/Short Term Services:** Describe how the state ensures eligible entities generally verify income eligibility for those services with limited intake procedures (where individual income verification is not possible or practical). An example of these services is emergency food assistance.

For all programs that are supported by CSBG funds, eligible entities must provide reasonable, documented evidence that the proportion of program clients who are CSBG-eligible is equal to or greater than the proportion of program costs paid with CSBG funds, or the proportion of program staff time devoted to serving CSBG-eligible clients is equal to or greater than the proportion of program costs paid with CSBG funds. For example, if CSBG supports 30% of a program's costs, then the agency must be able to demonstrate that at least 30% of the clients served have incomes at or below 125% of the federal poverty level, or at least 30% of staff time is allocated to serving CSBG-eligible clients.

When CSBG funds support short-term services with limited intake procedures, such as emergency food assistance, and individual income verification is not possible or practical, the eligible entity must provide an estimate with a reasonable, documented basis, that the proportion of program clients who are CSBG-eligible is equal to or greater than the proportion of program costs paid with CSBG funds. For example, such an estimate could be based on periodic, anonymous surveys of clients' self-reported income. Alternately, the eligible entity could provide evidence that due to the venue in which a particular service is provided, such as meals provided in an emergency homeless shelter, it could reasonably be assumed that clients meet the CSBG income guidelines.

- 12.3. Community-targeted Services:** Describe how the state ensures eligible entities' services target and benefit low-income communities for those services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations).

When CSBG funds are used for services that provide a community-wide benefit, eligible entities must be able to present evidence that the service benefits members of the community who are affected by poverty and is aligned with the needs of low-income community members as identified by the eligible entity's most recent triennial Community Needs Assessment. The eligible entity must use data from the U.S. Census or equivalent source to demonstrate that the services are located in a community in which a relatively high proportion of residents are living in poverty.



## SECTION 13: Results Oriented Management and Accountability (ROMA) System

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

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

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

**13.1a. ROMA Description:** If ROMA was chosen in Item 13.1, describe the state's written policies, procedures, or guidance documents on ROMA. As stated in its CSBG Policy and Procedures Manual, DCF requires that all eligible entities 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 outlines the services and activities the agency will implement, based on the findings of the Community Needs Assessment...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 that is responsive to the major needs of the low-income population in the community served by the contract agency. The board must also ensure that Results Oriented Management and Accountability (ROMA) goals and National Performance Indicators (NPIs) are incorporated in the formulation of the plan. For this reason, contract agencies' board members must receive ROMA training on an annual basis..."

"The Community Action Plans must include the following components:

1. A description of the major poverty-related problems identified by the agency's most recent Community Needs Assessment;
2. Prioritization of the identified problems by magnitude and severity;
3. 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;
4. Selection of problems that the agency will target for direct intervention and the specific programmatic approaches the agency will take;

5. 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
6. A plan for ongoing evaluation of the agency's activities."

Furthermore, DCF's CSBG Policy and Procedures Manual states that all eligible entities' "board members must be familiar with ROMA concepts and participate in periodic updates and review of the agency's Community Action Plan..., which uses ROMA as the basis of setting and tracking performance goals for the agency's programs and services."

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

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

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

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

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

1. Providing ROMA training for eligible entities' staff: a WISCAP staff member completed all steps to become a certified ROMA trainer in 2019, and several eligible entities' staff members also received training to become Nationally Certified ROMA Implementers (NCRI) in 2020. DCF also provides funding to WISCAP to provide targeted T/TA to all eligible entities. Training events will continue in FFYs 2024 and 2025, on at minimum an annual basis.
2. Providing ROMA training for eligible entities' boards of directors: WISCAP developed a ROMA training video specifically geared toward board members, available on-demand at: <https://www.youtube.com/watch?v=ph2pCwfu5z8>.
3. WISCAP and DCF are also providing one-on-one or group consultations on ROMA throughout the state.
4. Providing training and technical assistance related to the CSBG Annual Report: The CSBG contract manager provided live training sessions to help agency staff prepare to complete the 2022 CSBG Annual Report in November 2021, in

addition to updates and presentations at quarterly WISCAP meetings. DCF will continue to provide this training on, at minimum, an annual basis in FFY2024 and 2025.

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

**13.4. Eligible Entity Use of Data:** Describe how the state intends to validate that the eligible entities are using data to improve service delivery. During the CSBG monitoring process, DCF asks the following questions to assess the extent to which an eligible entity uses data to improve service delivery:

- Are all agency programs tied to at least one ROMA objective (NPI)?
- Is the agency able to obtain an unduplicated count of its participants for the CSBG Annual Report?
- What participant data does the agency collect and how does it use this data?
- Does the agency track whether participants use multiple services?
- Can the agency pull reports on how many participants are served by each individual program during a specific period?
- Does the agency have a system in place to track family, agency, and/or community outcomes?
- Does the agency track and compare data from multiple years to see trends in agency success, customer satisfaction, or other areas?
- Has the agency analyzed its outcomes in the past 12 months?
- Do the agency’s Community Action Plan and Strategic Plan document the continuous use of the full ROMA cycle (assessment, planning, implementation, achievement of results, and evaluation)?
- Does the agency use the services of a ROMA-certified trainer to assist in implementation?

If the answer to any of these questions is “no”, the eligible entity’s CSBG monitoring report will include a finding and/or recommendation related to the question which will result in the eligible entity developing a Technical Assistance Plan within 60 days of the communication of the finding. DCF will also offer technical assistance to assist the eligible entity in improving its ability to use data to improve service delivery.

Furthermore, DCF requires that each eligible entity completes an annual CSBG application that includes a Community Action Plan. The Community Action Plan must include outcome goals for each program. Eligible entities are also required to complete mid-year and year-end reports that provide the program’s results related to its outcome goals. If a program is failing to meet its goals, the eligible entity must provide information about the actions it is taking to improve the program’s performance.

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

## Community Action Plans and Needs Assessments

**13.5. Community Action Plan:** Describe how the state will secure a Community Action Plan from each eligible entity, as a condition of receipt of CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act. As stated in its CSBG Policy and Procedures Manual, DCF requires that all eligible entities 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.”

The eligible entities must submit an annual application to DCF that includes a Community Action Plan outlining their plans for use of the CSBG funds. Completed applications with Community Action Plans are due to DCF by October 1 in the year prior to the contract year, which begins on January 1. DCF reviews and approves the applications prior to issuing contracts.

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

**13.6. Community Needs Assessment:** Describe how the state will assure that each eligible entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity’s Community Action Plan, as required by Section 676(b)(11) of the CSBG Act. As stated in DCF’s CSBG Policy and Procedures Manual, “every three years, all contract agencies are required to conduct and submit a Community Needs Assessment. The purpose is to identify the greatest unmet poverty-related needs and the gaps in services for low-income individuals and families in the community, and to ensure that the agency is directing and adjusting its services regularly in response to the changing needs in the community.

The Community Needs Assessment must contain the following components:

1. An analysis of information gathered directly from low-income individuals through methods such as surveys, focus groups, interviews, and/or community forums;
2. Information gathered from community partners including community-based organizations, faith based organizations, public sector partners, law enforcement, and educational institutions; and
3. An analysis of the most recent U.S. Census Bureau data showing the incidence of poverty in the contract agency’s service area and how poverty affects different demographic groups in the community.”

In years when a Community Needs Assessment is conducted, each eligible entity must include a report on the findings of its Community Needs Assessment with its CSBG application and Community Action Plan. All of Wisconsin’s eligible entities just completed a Community Needs Assessment, which were submitted in October 2022. DCF reviewed each of these Community Needs Assessments and the entities’

Community Action Plans to ensure a clear relationship between the results of the assessment and the corresponding plans of the eligible entities.

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

**SECTION 14: CSBG Programmatic Assurance and Information Narrative**  
***(Section 676(b) of the CSBG Act)***

**14.1. Use of Funds Supporting Local Activities**

***CSBG Services***

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

- (A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals--
  - (i) to remove obstacles and solve problems that block the achievement of self- sufficiency (particularly for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
  - (ii) to secure and retain meaningful employment;
  - (iii) to attain an adequate education with particular attention toward improving literacy skills of the low-income families in the community, which may include family literacy initiatives;
  - (iv) to make better use of available income;
  - (v) to obtain and maintain adequate housing and a suitable living environment;
  - (vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent individual and family needs;
  - (vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to –
    - (I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and
    - (II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

Programs carried out through the state’s network of eligible entities support activities designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and

individuals, migrant or seasonal farmworkers, and elderly low-income individuals with the following goals:

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

**Examples of programs in this area include:** Family Self-Sufficiency programs that help participants of the Section 8 housing program to obtain employment and increased wages; transitional housing programs to help families prepare for self-sufficiency after being homeless; and small business development programs.

- (ii) to secure and retain meaningful employment;

**Examples of programs in this area include:** Skills Enhancement Program, which helps low-income working people obtain skills training for career advancement and increased income and access to benefits; and zero-interest car loan programs to help low-income workers obtain reliable transportation to work.

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

**Examples of programs in this area include:** Head Start, Early Head Start and other child development programs; GED and Adult Basic Education programs; and literacy initiatives for homeless families.

- (iv) to make better use of available income;

**Examples of programs in this area include:** financial literacy education programs; free tax preparation services for low- and moderate-income households; budget counseling; and assistance in accessing mainstream benefits.

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

**Examples of programs in this area include:** transitional housing and homeless shelters; home ownership programs; design and development of affordable housing; housing rehabilitation and weatherization; and Section 8 housing.

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

**Examples of programs in this area include:** energy assistance; emergency rental assistance; emergency shelters; domestic violence shelters and related services; and food pantries and other emergency food assistance.

- (vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law

enforcement agencies, local housing authorities, private foundations, and other public and private partners to –

- (I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and
- (II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts.

**Examples of programs in this area include:** neighborhood-based initiatives that arrange regular meetings between residents of neighborhoods that have experienced frequent shootings and other violent crimes and local law enforcement; door-to-door canvassing of target neighborhoods to assess housing quality and other safety issues, with information provided to the local municipal government and other local partners in order to infuse challenged neighborhoods with a range of opportunities to improve safety, quality of life, housing, and employment opportunities for residents; and local Housing Coalitions that include representatives from law enforcement, probation, and parole in order to coordinate housing for people returning from incarceration. Through these types of initiatives, partnerships are formed, needs are discussed, solutions are developed and implemented, and best practices are documented and shared with the general public and other communities and agencies as appropriate.



## ***Needs of Youth***

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

- (B) to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as--
- (i) programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and
  - (ii) after-school child care programs;

DCF requires eligible entities to describe in their annual applications for CSBG funds how they provide and/or support efforts to address the needs of youth in low-income communities.

Wisconsin’s eligible entities operate approximately 25 programs that address the needs of youth in low-income communities. The following are some programmatic examples:

- Fresh Start, which provides education, hands-on construction training, and career direction focused on economic self-sufficiency for high-risk teens and young adults. The majority of youth served by Fresh Start programs are high school dropouts from low-income households. Common barriers they face include teen pregnancy/parenting, substance abuse issues, and contact with the juvenile and/or criminal justice system;
- Personal Responsibility Education Program (PREP), which is part of a multipronged federal strategy funded under the Affordable Care Act to reduce teenage pregnancies and sexually transmitted infections (STIs). PREP offers high quality, innovative teen pregnancy, and STI prevention services to at-risk youth;
- SDC operates several youth programs in Milwaukee, including a Gang Diversion Program for youth at risk of gang involvement and a Youth Advisory Board for teens ages 14 to 18;
- WIOA-funded youth employment programs; and
- CAP Services, Inc. has dedicated six beds in its Family Crisis Shelter for runaway and homeless youth.

### ***Coordination of Other Programs***

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

- (C) to make more effective use of, and to coordinate with, other programs related to the purposes of this subtitle (including State welfare reform efforts)

Through the CSBG monitoring process, the CSBG contract manager routinely ensures that there are strong collaborative relationships between eligible entities and other anti-poverty organizations in each community. These relationships serve to reduce duplication of efforts among local service providers and focus resources strategically on local communities’ most pressing needs.

The following are some examples of eligible entities’ activities in this area:

- Leading local Continuums of Care, which are the communitywide consortia of service providers and other stakeholders working together to address homelessness on the local level;
- Coordinating the food pantries that cover an eligible entity’s service area;
- Working with local workforce development boards to improve employment outcomes and training opportunities for low-income people;
- Working with the full spectrum of educational institutions via partnerships between Head Start and elementary schools; high schools through programs like Fresh Start, reproductive health and pregnancy prevention services; and post-secondary institutions with programs like Skills Enhancement, Fresh Start or other workforce training programs;
- Providing domestic abuse or sexual assault services through cooperative agreements with law enforcement, district attorneys, corrections, health providers, schools, and universities; and
- Partnering with county human service departments in a variety of ways in order to better serve mutual customers.

### ***State Use of Discretionary Funds***

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

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

[No response as the state describes this assurance under 7.9 and 7.10.]

### ***Eligible Entity Service Delivery, Coordination, and Innovation***

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

#### ***Eligible Entity Service Delivery System***

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

The eligible entities operate a wide variety of services for low-income individuals and families including housing and homeless prevention; employment and training programs; medical and dental care; Head Start and child care centers; transportation assistance; emergency food programs; weatherization; energy assistance; and programs that promote family stability and positive parenting practices for both custodial and noncustodial parents. Referrals come to these programs through 2-1-1 call centers, other service providers in the community, and other programs within the eligible entities themselves. Many of the eligible entities also report receiving a significant portion of their referrals through word-of-mouth, when members of the community share information with one another about where to go for assistance.

#### ***Eligible Entity Linkages – Approach to Filling Service Gaps***

- 14.3b. 676(b)(3)(B)** Describe “how linkages will be developed to fill identified gaps in the services, through the provision of information, referrals, case management, and followup consultations.”

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

[No response as the state describes this assurance under 9.3b.]

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

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

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

[No response as the state describes this assurance under 9.7]

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

- 14.3d. 676(b)(3)(D)** Describe “how the local entity will use the funds [made available under 675C(a)] to support innovative community and

neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting.”

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

All eligible entities use a portion of their CSBG allocations to research and develop effective solutions to community needs. These solutions have included the creation of community health centers and clinics that provide affordable health and dental care to low-income people. They have also included the development of a significant number of new and rehabilitated housing units for low-income families and seniors.

Some of the state’s eligible entities operate fatherhood programs. Two of these programs are linked with Head Start programs and focus on engaging the fathers of children enrolled in Head Start, and others are freestanding fatherhood programs that focus on improving employment outcomes for low-income fathers.

Some of the state’s eligible entities operate programs to strengthen families using a two-generation approach.

Some of the state’s eligible entities operates a program to strengthen families through improved birth outcomes, which involves both pre- and post-natal programming and services.

In FFYs 2024 and 2025, Wisconsin agencies will continue to operate programs such as these, generating successful solutions to community needs.

#### ***Eligible Entity Emergency Food and Nutrition Services***

- 14.4. 676(b)(4)** Describe how the state will assure “that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals.”

DCF requires eligible entities to indicate on their annual applications for CSBG funds how they provide and/or support efforts to provide emergency food and nutrition services.

In Wisconsin, 15 of the 16 CAAs and UMOs directly provide emergency food assistance, and those that do not operate their own programs regularly refer households to food

pantries and meal sites as necessary and appropriate. These agencies distribute food that they obtain through the USDA's The Emergency Food Assistance Program (TEFAP), private in-kind and cash donations, food drives, and perishable food recovery from farms, restaurants, grocery stores, and other food industry partners. Wisconsin's eligible entities' mobilize thousands of volunteers across the state each year to assist in feeding the hungry.

In addition, WISCAP staff work closely with Wisconsin's administrator of TEFAP. When issues arise related to agency responsiveness to problems (such as issues with food storage, attendance at coordinating meetings, staffing problems, or other issues) WISCAP staff works with the grantees to help ensure that the funded agencies address the identified issues. The TEFAP administrator also meets with the eligible entities that operate emergency food programs at WISCAP board meetings once or twice per year.

Three eligible entities also operate Women, Infants & Children Nutrition (WIC) programs.

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

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

**Note:** The state describes this assurance in Section 9, State Linkages and Communication, specifically under 9.1 – 9.4b.

[No response as the state describes this assurance under Section 9.1 – 9.4b]

#### ***State Coordination/Linkages and Low-income Home Energy Assistance***

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

**Note:** The state describes this assurance in Section 9, State Linkages and Communication section, items 9.2 and 9.5.

[No response as the state describes this assurance under 9.2 and 9.5]

#### ***Federal Investigations***

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

**Note:** The state addresses this assurance in Section 10, Fiscal Controls and Monitoring under 10.13.

[No response as the state describes this assurance under 10.13]

### ***Funding Reduction or Termination***

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

**Note:** The state addresses this assurance in Section 10 Fiscal Controls and Monitoring under 10.7.

[No response as the state describes this assurance under 10.7]

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

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

**Note:** The state describes this assurance in Section 9 State Linkages and Communication, under 9.6.

[No response as the state describes this assurance under 9.6]

### ***Eligible Entity Tripartite Board Representation***

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

**Note:** The state describes this assurance in Section 11 Eligible Entity Tripartite Boards, under 11.3.

[No response as the state describes this assurance under 11.3]

### ***Eligible Entity Community Action Plans and Community Needs Assessments***

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



needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs.”

**Note:** The state describes this assurance in Section 13 ROMA, under 13.5 and 13.6.

[No response as the state describes this assurance under 13.5 and 13.6]

***State and Eligible Entity Performance Measurement: ROMA or Alternate system***

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

**Note:** The state describes this assurance in Section 13 ROMA under 13.1 – 13.4.

[No response as the state describes this assurance under 13.1 – 13.4]

***Validation for CSBG Eligible Entity Programmatic Narrative Sections***

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

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

[No response for this item]

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

## SECTION 15: Federal Certifications

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

### 15.1. Lobbying

#### ***Certification for Contracts, Grants, Loans, and Cooperative Agreements***

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

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

#### ***Statement for Loan Guarantees and Loan Insurance***

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

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

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

## 15.2. Drug-Free Workplace Requirements

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

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

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

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

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

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

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

### ***Certification Regarding Drug-Free Workplace Requirements***

#### **Alternate I. (Grantees Other Than Individuals)**

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

- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (b) Establishing an ongoing drug-free awareness program to inform employees about - -
  - (1) The dangers of drug abuse in the workplace;
  - (2) The grantee's policy of maintaining a drug-free workplace;
  - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
  - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will - -
  - (1) Abide by the terms of the statement; and
  - (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- (e) Notifying the agency in writing, within 10 calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
- (f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -
  - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

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

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

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

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

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

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

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

### 15.3. Debarment

#### ***CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS***

##### ***Certification Regarding Debarment, Suspension, and Other Responsibility Matters — Primary Covered Transactions***

###### Instructions for Certification

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

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

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

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

## ***Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion — Lower Tier Covered Transactions***

### Instructions for Certification

- (1) By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
- (2) The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
- (3) The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.
- (4) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.
- (5) The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.
- (6) The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled “Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction,” without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
- (7) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.
- (8) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.



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

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

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

#### **15.4. Environmental Tobacco Smoke**

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

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

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