

SECTION 1

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

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

1.1a. Lead agency *Wisconsin Department of Children and Families*

1.1b. Cabinet or administrative department of this lead agency [**Check One**]

- Community Services Department
- Human Services Department
- Social Services Department
- Governor's Office
- Community Affairs Department
- Other, describe: _____

1.1c. Division, bureau, or office of the CSBG authorized official *Secretary's Office*

1.1d. Authorized official of the lead agency *Eloise Anderson*

Instructional note: The authorized official could be the director, secretary, commissioner etc. as assigned in the designation letter (attached under item 1.3). The authorized official is the person indicated as authorized representative on the SF-424M.

1.1e. Street Address *201 East Washington Avenue, PO Box 8916*

1.1f. City *Madison*

1.1g. State *WI*

1.1h. Zip *53708*

1.1i. Telephone Number and Extension *608-267-3905*

1.1j. Fax Number *608-266-6836*

1.1k. Email Address *DCFSecretaryEloiseAnderson@wisconsin.gov*

1.1l. Lead agency website *www.dcf.wisconsin.gov*

1.2. Please provide the following information in relation to the designated State CSBG Contact.

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

1.2a. Agency Name *Wisconsin Department of Children and Families*

1.2b. Name of the point of contact *Katie Castern*

1.2c. Street Address *201 East Washington Avenue, PO Box 8916*

1.2d. City *Madison*

1.2e. State *WI*

1.2f. Zip *53708*

1.2g. Telephone Number *608-267-8949*

1.2h. Fax Number *608-261-6376*

1.2i. Email Address *Katie.castern@wisconsin.gov*

1.2j. Website *www.dcf.wisconsin.gov*

1.3. Designation Letter: Attach the State's official CSBG designation letter. If either the governor or designated agency has changed, update the letter accordingly. **See Attachment 1.**

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

SECTION 2
State Legislation and Regulation

2.1. CSBG State Legislation Does the State have a statute authorizing CSBG? Yes No

2.2. CSBG State Regulation Does the State have regulations for CSBG? Yes No

2.3. If yes was selected in item 2.1 or 2.2, attach a copy (or copies) of legislation and/or regulations or provide a hyperlink(s), as appropriate.

<http://docs.legis.wisconsin.gov/statutes/statutes/49/III/265>

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

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

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

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

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, Bureau of Working Families is responsible for administering CSBG funds. Along with CSBG, the Division of Family and Economic Security 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.

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

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

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

Goals:

- 1) *DCF will identify and promote best practices among local community action agencies and CSBG-eligible organizations (also referred to as eligible entities) for effective agency management, board governance, and programming that shows measurable results in terms of improving the lives of Wisconsin residents who are affected by poverty;*
- 2) *DCF will provide onsite monitoring at every eligible entity at least once every three years, with annual desk review monitoring related to the CSBG Organizational Standards;*
- 3) *DCF will support eligible entities in meeting the CSBG Organizational Standards by providing appropriate training and technical assistance;*
- 4) *DCF will ensure that training in Results Oriented Management and Accountability (ROMA) is available to all agencies’ boards of directors and staff; and*
- 5) *DCF will collaborate and share information with other state departments that fund CSBG-eligible entities.*

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

3.3a. Analysis of [Check all that applies and add narrative where applicable]

- State Performance Indicators and/or National Performance Indicators (NPIs)
- U.S. Census data
- State performance management data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)
- Other data (please describe) _____
- Eligible entity community assessments
- Eligible entity plans
- Other information from eligible entities, e.g., State required reports (please describe) _____

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

- Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)
- State community action association and regional CSBG T & TA providers
- State partners and/or stakeholders (describe) Department of Workforce Development, Division of Housing, Division of Energy, Department of Health Services
- National organizations (describe) _____
- Other (describe) _____

3.4 Eligible Entity Involvement

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

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

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

- *DCF shared an initial draft of the State Plan with the eligible entities and the Wisconsin Community Action Program Association (WISCAP) on April 30, 2015.*
- *Eligible entities were encouraged to share questions and suggestions related to the State Plan. The CSBG Contract Manager also discussed the State Plan with the eligible entities at the annual WISCAP meeting on May 6, 2015.*
- *DCF held a conference call with the eligible entities and WISCAP on May 15, 2015, to go over the draft State Plan, answer questions, and gather input. Staff members from eight of the community action agencies and WISCAP participated in this conference call.*
- *DCF also ensured that all eligible entities received notice of the combined public and legislative hearing on July 17, 2015, which included the final draft of the State Plan.*

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

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

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

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

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

Instructional Note: The State's target score will indicate improvement or maintenance of the States' Overall Satisfaction score from the most recent American Customer Survey Index (ACSI) survey of the State's eligible entities. (See information about the ACSI in the CSBG State Accountability Measures document.)

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

SECTION 4 CSBG Hearing Requirements

4.1. Public Inspection: Describe how the State made this State plan, or revision(s) to the State plan, available for public inspection, as required under Section 676(e)(2) of the Act.

DCF held a public hearing on July 17, 2015. DCF made the State Plan 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. Copies of the plan were also available at the public hearing and upon request.

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.

In order to provide sufficient time for the public to comment, DCF distributed notice about the hearing on June 26, 2015. This allowed 10 business days for the public to comment in advance of the hearing date. DCF used the following methods to distribute notice: sending hearing notices to all eligible entities, WISCAP, and legislative and administrative offices in the Wisconsin State Capitol; posting the notice on DCF's website; and posting the notice within DCF's office.

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

Instructional Note: The date(s) for the public hearing(s) must have occurred in the year prior to the first Federal fiscal year covered by this plan. Legislative hearings are held at least every three years, and must have occurred within the last three years prior to the first Federal fiscal year covered by this plan.

| Date | Location | Type of Hearing |
|---|--|---|
| July 17, 2015 | Wisconsin Department of Children and Families 201 E Washington Avenue Madison, Wisconsin | <input type="checkbox"/> Public <input type="checkbox"/> Legislative <input checked="" type="checkbox"/> Combined |
| ADD a ROW function Note: rows will be able to be added for each additional hearing | | |

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

See Attachment 2.

SECTION 5 CSBG Eligible Entities

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

| CSBG Eligible Entity | Public or Nonprofit | Type of Agency (CAA, Limited Purpose Agency, Migrant or Seasonal Farmworker Organization, Tribe) | Geographical Area Served |
|--|----------------------------|---|--|
| ADVOCAP, Inc. | Nonprofit | CAA | Fond du Lac, Winnebago and Green Lake Counties |
| CAP Services, Inc. | Nonprofit | CAA | Marquette, Outagamie, Portage, Waupaca, and Waushara Counties |
| Central Wisconsin Community Action Council, Inc. | Nonprofit | CAA | Adams, Columbia, Dodge, Juneau, and Sauk Counties |
| Community Action Coalition for South Central Wisconsin, Inc. | Nonprofit | CAA | Dane, Jefferson, and Waukesha Counties |
| Community Action of Rock and Walworth Counties | Nonprofit | CAA | Rock and Walworth Counties |
| Indianhead Community Action Agency | Nonprofit | CAA | Burnett, Clark, Rusk, Sawyer, Taylor, and Washburn Counties |
| Lakeshore Community Action Program | Nonprofit | CAA | Door, Kewaunee, Manitowoc, and Sheboygan Counties |
| Northeast Wisconsin Community Action Program (NEWCAP) | Nonprofit | CAA | Brown, Shawano, Oconto, Menominee, Langlade, Oneida, Vilas, Forest, Florence, and Marinette Counties |
| North Central Community Action Program (NCCAP) | Nonprofit | CAA | Marathon, Wood, and Lincoln Counties |
| Northwest Community Services Agency (Northwest CSA) | Nonprofit | CAA | Douglas, Bayfield, Ashland, Iron, and Price Counties |
| Racine/Kenosha Community Action Agency | Nonprofit | CAA | Racine and Kenosha Counties |

| | | | |
|---|-----------|---|---|
| Community Relations - Social Development Commission | Nonprofit | CAA | Milwaukee County |
| Southwest CAP | Nonprofit | CAA | Richland, Iowa, Grant, Lafayette, and Green Counties |
| Western Central Community Action Agency (West CAP) | Nonprofit | CAA | Chippewa, Dunn, Pepin, Pierce, St. Croix, Polk, and Barron Counties |
| Western Dairyland Economic Opportunity Council | Nonprofit | CAA | Trempealeau, Buffalo, Eau Claire, and Jackson Counties |
| Coulecap, Inc. | Nonprofit | CAA | La Crosse, Monroe, Vernon, and Crawford Counties |
| Foundation for Rural Housing | Nonprofit | Limited Purpose Agency | Statewide, with the exception of Dane, Milwaukee, and Racine Counties |
| United Migrant Opportunity Services (UMOS) | Nonprofit | Migrant or Seasonal Farmworker Organization | Statewide |

5.2 Total number of CSBG eligible entities: 18

5.3 Changes to Eligible Entities list: Has the list of eligible entities under item 5.1 changed since the State’s last State Plan submission? Yes No

As of January 1, 2015, DCF is no longer providing CSBG funds to the Coalition of Wisconsin Aging Groups (CWAG), which was classified as a Limited Purpose Agency with a statewide service area. Because CWAG was never designated by a legislative body as a CSBG eligible entity, its past CSBG funding was discretionary. Therefore, CWAG was not allowed the assurance granted under 42 U.S.C. §9908(b)(8) regarding reduction or termination of funding, and DCF did not need to follow the federal requirements for defunding an eligible entity as outlined at 42 U.S.C. §9915.

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

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

SECTION 6

Organizational Standards for Eligible Entities

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

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

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

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

6.2a. If yes was selected in item 6.2, describe the State’s proposed minor modification to the COE-developed organizational standards, and provide a rationale.

6.3 How will/has the State officially adopt(ed) organizational standards for eligible entities in the State in a manner consistent with the State’s administrative procedures act? If “Other” is selected, provide a timeline and additional information, as necessary.

- Regulation
- Policy
- Contracts with eligible entities
- Other, describe: _____

6.4 How will the State assess eligible entities against organizational standards, as described in IM 138?

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

6.4a. Describe the assessment process.

DCF will assess if each eligible entity is meeting the organizational standards through the on-site CSBG monitoring that it conducts at least once every three years. During years in which an eligible entity does not receive an onsite monitoring review, DCF will conduct an annual desk review to assess that eligible entity against the organizational standards. This process will require eligible entities to submit documentation to DCF of their compliance with the organizational standards.

6.5. Will the State make exceptions in applying the organizational standards for any eligible entities due to special circumstances or organizational characteristics, as described in IM 138?

Yes No

6.5a. If yes was selected in Item 6.5, list the specific eligible entities the State will exempt from meeting organizational standards, and provide a description and a justification for each exemption.

In alignment with OCS's recognition that states may provide CSBG funds to certain eligible entities, including limited purpose agencies, state-funded tribal organizations, and migrant and seasonal farmworker organizations, for which the organizational standards may not be appropriate, DCF plans to exempt two organizations from two of the standards.

The agencies are Foundation for Rural Housing (FRH), a statewide limited purpose agency with an annual budget under \$500,000, and UMOS, a multi-state agency that uses CSBG funding for specific services targeted to Wisconsin's migrant and seasonal farmworker families.

The two standards from which these agencies are exempted are 5.1, which requires a tripartite board of directors, and 5.2, which requires a democratic selection process for low-income board representatives.

The rationale for making an exception for FRH is that maintaining a tripartite board and putting a statewide democratic selection process in place would put an undue burden on this small, limited purpose agency. Furthermore, the agency has historically ensured that at least 50% of its board members are representatives from low-income communities.

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.

In addition, 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.

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

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

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

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

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

| Planned CSBG 90 Percent Funds | | |
|--|-----------------|-----------------|
| CSBG Eligible Entity | Year One | Year Two |
| ADVOCAP, Inc. | 3.85% | 3.85% |
| CAP Services, Inc. | 4.40% | 4.40% |
| Central Wisconsin Community Action Council, Inc. | 3.02% | 3.02% |
| Community Action Coalition for South Central Wisconsin, Inc. | 11.55% | 11.55% |
| Community Action of Rock and Walworth Counties | 4.30% | 4.30% |
| Indianhead Community Action Agency | 2.20% | 2.20% |
| Lakeshore Community Action Program | 2.74% | 2.74% |
| Northeast Wisconsin Community Action Program (NEWCAP) | 6.75% | 6.75% |
| North Central Community Action Program (NCCAP) | 3.00% | 3.00% |

| | | |
|---|---------------|---------------|
| Northwest Community Services Agency (Northwest CSA) | 1.80% | 1.80% |
| Racine/Kenosha Community Action Agency | 5.85% | 5.85% |
| Community Relations - Social Development Commission | 24.98% | 24.98% |
| Southwest CAP | 2.04% | 2.04% |
| Western Central Community Action Agency (West CAP) | 4.25% | 4.25% |
| Western Dairyland Economic Opportunity Council | 2.82% | 2.82% |
| Coulecap, Inc. | 3.40% | 3.40% |
| Foundation for Rural Housing | 1.4% | 1.4% |
| United Migrant Opportunity Services (UMOS) | 4% | 4% |
| Total | 92.87% | 92.87% |

7.3 Distribution Process: Describe the specific steps in the State’s process for distributing 90 percent funds to the eligible entities and include the number of days each step is expected to take; include information about State legislative approval or other types of administrative approval (such as approval by a board or commission).

All contract agencies 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 August 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 agency’s annual CSBG application. DCF has a process through which the program area staff, finance staff, budget staff, the division administrator, and the deputy secretary must review and approve the funding allocation plan and contract language. Once this process is completed, DCF sends contracts to agencies for signatures 30 days before the start of the contract period. The agencies then have 60 days to sign and return their contracts.

DCF distributes CSBG funds to agencies on a reimbursement basis. Once the contract year is underway, agencies may submit claims for reimbursement by the 20th day of the following month in order 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 20, 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 Central Office Reporting (CORe).

The CORe 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 20th 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 CORe 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 90 days after the end of the grant period, which is March 31 of the year following the contract year.

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.

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

Yes No

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

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

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

7.5. Performance Management Adjustment: How is the State improving grant and/or contract administration procedures under this State Plan as compared to past plans? Any improvements should be based on analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any improvements, provide further detail.

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 What amount of State CSBG funds does the State plan to allocate for administrative activities, under this State plan? The estimate may be in dollars or a percentage.

1.93%

7.7 How many State staff positions will be funded in whole or in part with CSBG funds under this State Plan? **2**

7.8. How many State Full Time Equivalents (FTEs) will be funded with CSBG funds under this State Plan? **1.25 FTE**

Remainder/Discretionary Funds

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

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

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

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

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

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

| Use of Remainder/Discretionary Funds | | | |
|---|-----------------------------|-----------------------------|---|
| Remainder/ Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act) | Year One | Year Two | Brief description of services/activities |
| | Planned \$ or Planned % | Planned \$ or Planned % | |
| a. Training/technical assistance to eligible entities | \$66,000 (0.81%) | \$66,000 (0.81%) | These planned services/activities will be described in State Plan Item 8.1 |
| b. Coordination of State-operated programs and/or local programs | 0% | 0% | These planned services/activities will be described in State Plan section 9, State Linkages and Communication. |
| c. Statewide coordination and communication among eligible entities | \$32,000 (0.39%) | \$32,000 (0.39%) | <i>DCF will support quarterly meetings 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 of DCF and other state departments that provide funding to the eligible entities. These planned services/activities will be described in State Plan section 9, State Linkages and</i> |

| | | | |
|---|---------------------------------|---------------------------------|--|
| | | | <i>Communication.</i> |
| d. Analysis of distribution of CSBG funds to determine if targeting greatest need | 0% | 0% | |
| e. Asset-building programs | 0% | 0% | |
| f. Innovative programs/activities by eligible entities or other neighborhood groups | 0% | 0% | |
| g. State charity tax credits | 0% | 0% | |
| h. Other activities, specify <u>Tribes</u> | (\$326,434) 4% | (\$326,434) 4% | <p><i>Wisconsin allocates four percent 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:</i></p> <ul style="list-style-type: none"> <i>• Domestic abuse intervention;</i> <i>• Child welfare programs;</i> <i>• Initiatives that empower low-income individuals, families, and communities to overcome the effects of poverty;</i> <i>• Adolescent pregnancy prevention and parenting skills programs for adolescent parents; and</i> <i>• Child care.</i> <p><i>Each tribe has the flexibility to include and emphasize the services that will meet the need of individual families and the tribal community.</i></p> |
| Totals | \$424,434 | \$424,434 | |

7.10. What types of organizations, if any, does the State plan to work with (by grant or contract using remainder/discretionary funds) to carry out some or all of the activities in table 7.9.

- 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
- None (the State will carry out activities directly)

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

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

7.11. Performance Management Adjustment: How is the State adjusting the use of remainder/discretionary funds under this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any adjustments, provide further detail.

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

SECTION 8

State Training and Technical Assistance

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

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

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

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

| Training and Technical Assistance | | | |
|--|---|--------|------------------------------|
| Fiscal Year (FY) Quarter (Q) / Timeframe | Training, Technical Assistance, or Both | Topic | Brief Description of “Other” |
| FY1 - Q1 | Training | Fiscal | |

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

| Training and Technical Assistance | | | |
|---|---|--|------------------------------|
| Fiscal Year (Y) Quarter (Q) / Timeframe | Training, Technical Assistance, or Both | Topic | Brief Description of "Other" |
| Ongoing / Multiple Quarters | Technical Assistance | Fiscal | |
| Ongoing / Multiple Quarters | Technical Assistance | Governance/Tripartite Boards | |
| Ongoing / Multiple Quarters | Training | Organizational Standards – General | |
| All quarters | Technical Assistance | Organizational Standards – technical assistance for eligible entities with unmet standards | |
| FY1 – Q1 | Training | Reporting | |
| FY2 – Q1 | Training | Reporting | |
| Ongoing / Multiple Quarters | Training | ROMA | |
| FY1 – Q1 | Training | Community Assessment | |
| Ongoing / Multiple Quarters | Technical Assistance | Community Assessment | |
| Ongoing / Multiple Quarters | Technical Assistance | Strategic Planning | |
| Ongoing / Multiple Quarters | Technical Assistance | Correcting Significant Deficiencies Among Eligible Entities | |

8.1a. The planned budget for the training and technical assistance plan (as indicated in the Remainder/Discretionary Funds table in item 7.9): **\$132,000**

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

8.2. Does the State have in place Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs) for all eligible entities with unmet organizational standards, if appropriate?
 Yes No

Note: 8.2 is associated with State Accountability Measure 6Sb. QIPs are described in Section 678C(a)(4) of the CSBG Act. If the State, according to their corrective action

procedures, does not plan to put a QIP in place for an eligible entity with one or more unmet organizational standards, the State should put a TAP in place to support the entity in meeting the standard(s).

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

- 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

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

8.4. Performance Management Adjustment: How is the State adjusting the training and technical assistance plan under this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any adjustments, provide further detail.

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 plans to create or maintain to ensure increased access to CSBG services to low-income people and communities under this State Plan and avoid duplication of services (as required by the assurance under Section 676(b)(5)). Describe or attach additional information as needed.

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

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

DCF coordinates with the offices indicated in the following ways:

- *Sharing CSBG monitoring reports with other state offices that contract with the eligible entities;*
- *Hearing from other offices that contract with the eligible entities at WISCAP's quarterly meetings;*
- *Sharing the State CSBG Plan with other state agencies that contract with the eligible entities;*
and
- *Sharing annual CSBG reports that are prepared for the legislators with other state offices.*

In addition, the CSBG Contract Manager is a member of the Interagency Council on Homelessness, a coordinating body to share information about the various responses to homelessness throughout state government.

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

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

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

9.3 Eligible Entity Linkages and Coordination

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

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

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 donated food, 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, and other recognized community institutions often provide a significant volume of referrals to eligible entities and rely on their responsiveness to meet the urgent and emergent needs of the families they serve.

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.

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

Because the needs of low-income families and households are often complex and greater than the program offerings in any one agency, Wisconsin's established network of eligible entities have necessarily developed strong referral relationships with public and private agencies. 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.

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

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

Yes No

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

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

9.4b. If the State selected "no" under item 9.4, describe the coordination of employment and training activities, as defined in Section 3 of WIOA, by the State and by eligible entities providing activities through the WIOA system.

Among the local agencies in Wisconsin funded by CSBG, several agency executive directors are active in their regional Workforce Development Boards, several have staff stationed at regional Job Centers, and at least one agency has created a community services center in which employment services are co-located with health services and a family resource center.

Also, DCF is represented on the Governor's Council on Workforce Investment.

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).

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

The 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. 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 five CSBG eligible entities that serve as sub-contractors for county governments.

DOA also administers the state's Weatherization Assistance Program. Thirteen 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.

9.6. State Assurance: Faith-based Organizations, Charitable Groups, Community

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

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

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 Information Systems (IS) Survey.

On the 2014 CSBG IS Survey, Wisconsin's eligible entities reported that they worked with a total of 554 faith-based organizations and 1,493 non-profit organizations. In addition, they reported working with 306 school districts, 195 financial/banking institutions, 197 health service institutions, and 696 for-profit businesses.

In FFYs 2016 and 2017, Wisconsin's eligible entities will continue partnering with large numbers of other local organizations.

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.

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

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 2014 CSBG IS Survey, the State's eligible entities reported that they administered over \$99 million in non-CSBG federal funding, over \$31 million in state funding, just under \$7 million in local government funding, and \$26.7 million in private resources. CSBG funds represented only 4.5% of the total funds the eligible entities leveraged in 2014; 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 key way 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, 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.

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 will reserve a portion of its discretionary CSBG funding to support quarterly meetings 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.

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

| Communication Plan | | | |
|---|---|---|---|
| Topic | Expected Frequency [daily, weekly, twice-monthly, monthly, quarterly, semi-annually, annually, other] | Format [newsletter, mailing, meetings/presentations, blog, email, website, social media, other] | Brief Description of “Other” If “Other” is selected in columns 2 and/or 3, describe in this column |
| The CSBG Contract Manager will forward NASCSP weekly updates to the eligible entities, along with any other pertinent information from that week. | Weekly | email | |
| The CSBG Contract Manager will attend WISCAP’S winter meeting, which is held in February, to share the annual CSBG timeline that outlines important dates for the year and any other updates related to CSBG funding. | Annually | meetings/presentations | |
| The CSBG Contract Manager will attend the WISCAP Annual Meeting, which is held in May, to share updates related to CSBG funding. | Annually | meetings/presentations | |
| The CSBG Contract Manager will attend the WISCAP fall meeting, which is held each November, and provide training on the annual IS Survey and other updates related to CSBG funding. | Annually | meetings/presentations | |
| DCF will hold a conference call with the eligible entities and WISCAP to answer questions and solicit input on the draft CSBG State Plan. | Every two years | other | conference call |
| DCF will hold a combined public and legislative hearing for the CSBG State Plan. | Every two years | meetings/presentations | |

| | | | |
|---|---------|-------|-----------------|
| The CSBG Contract Manager will participate, along with WISCAP staff, in conference calls with the Federal Region V CSBG Regional Performance Innovation Consortium. | Monthly | other | conference call |
| The CSBG Contract Manager and Program Operations Section Chief will participate in conference calls with WISCAP staff to identify the eligible entities' training and technical assistance needs, and plan for how these needs will be met. | Monthly | other | conference call |

9.10. Feedback to Eligible Entities and State Community Action Association: Describe how the State will provide feedback to local entities and State Community Action Associations regarding performance on State Accountability Measures.

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

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.

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

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

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.

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

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

| CSBG Eligible Entity | Review Type | Target Date | Date of Last Full Onsite Review (if applicable) | Brief Description of “Other” |
|--|--|--|---|------------------------------|
| | Options: <ul style="list-style-type: none"> • Full onsite • Newly Designated • Follow-up • Other • No review | Options: <ul style="list-style-type: none"> • FY1 Q1 • FY1 Q2 • FY1 Q3 • FY1 Q4 • FY2 Q1 • FY2 Q2 • FY2 Q3 • FY2 Q4 | | |
| ADVOCAP, Inc. | Full onsite | FY1 Q2 | February 13 and 14, 2013 | |
| CAP Services, Inc. | No review | Blank | November 11 and 12, 2014 | |
| Central Wisconsin Community Action Council, Inc. | No review | Blank | March 25 and 26, 2015 | |
| Community Action Coalition for South Central Wisconsin, Inc. | No review | Blank | January 13 and 14, 2015 | |
| Community Action of Rock and Walworth Counties | No review | Blank | May 13 and 14, 2015 | |

| | | | | |
|---|-------------|--------|---------------------------|--|
| Indianhead Community Action Agency | Full onsite | FY2 Q4 | August 11 and 12, 2014 | |
| Lakeshore Community Action Program | Full onsite | FY2 Q4 | July 29 and 30, 2014 | |
| Northeast Wisconsin Community Action Program (NEWCAP) | No review | Blank | July 21 and 22, 2015 | |
| North Central Community Action Program (NCCAP) | No review | Blank | August 3 and 4, 2015 | |
| Northwest Community Services Agency (Northwest CSA) | No review | Blank | June 4 and 5, 2015 | |
| Racine/Kenosha Community Action Agency | No review | Blank | December 10 and 11, 2014 | |
| Community Relations - Social Development Commission | Full onsite | FY2 Q4 | September 17 and 18, 2014 | |
| Southwest CAP | Full onsite | FY2 Q4 | July 21 and 22, 2014 | |
| Western Central Community Action Agency (West CAP) | No review | Blank | June 29 and 30, 2015 | |
| Western Dairyland Economic Opportunity Council | No review | Blank | July 1 and 2, 2015 | |
| Coulecap, Inc. | No review | Blank | August 12 and 13, 2015 | |
| Foundation for Rural Housing | No review | Blank | February 11 and 12, 2015 | |
| United Migrant Opportunity Services | No review | Blank | July 8 and 9, 2015 | |

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

See Attachment 3.

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 of closure of findings included in the State monitoring protocols attached above? Yes No

10.4a. If “no,” describe State procedures for addressing eligible entity findings/deficiencies, and the documenting of closure of findings.

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): How many eligible entities are currently on Quality Improvement Plans? 0

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

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

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

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.

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

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

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

- 10.8.** Does the State CSBG statute and/or regulations provide for the designation of new eligible entities? Yes No

10.8a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for the designation of new eligible entities.

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.”

- 10.9.** Does the State CSBG statute and/or regulations provide for de-designation of eligible entities? Yes No

10.9a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for de-designation of new eligible entities.

Wis. Stat. s. 49.265(2)(c) states, “the approval of a community action agency may be rescinded but only if there is good cause and if the decision to rescind is made by both the legislative body of the county, city, village or town that granted the approval and the secretary. At least 90 days before rescinding approval, the legislative body or secretary shall notify the community action agency of its reasons for the action and hold a public hearing in the community concerning the action.”

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

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

Section 2.3 of DCF's CSBG Policy and Procedures Manual states, "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 existing CAAs decline to serve the unserved county, the state may create a new CAA. 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. Regardless of whether the agency is an existing CAA, or a newly designated CAA, the board of supervisors for the unserved county would need to approve a resolution to designate the agency as the CAA for that county."

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 establish 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 SF425 Federal fiscal report. Only items liquidated by the reporting date are included in interim reports.

10.12. Single Audit Management Decisions: Describe State procedures for issuing management decisions for eligible entity single audits, as required by Block Grant

regulations applicable to CSBG at 45 CFR 75.521. If these procedures are described in the State monitoring protocols attached under item 10.2, indicate the page number.
Note: This information is associated with State Accountability Measure 4Sd.

All of the eligible entities operate on a calendar year, 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.

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

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

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

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

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 Which of the following measures are taken to ensure that the State verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B of the CSBG Act?

- Attend Board meetings
- Review copies of Board meeting minutes
- Track Board vacancies/composition
- Other: DCF requires eligible entities to include their board rosters that identify each member by sector (Public, Private, Low-Income Representative) with their annual CSBG applications. In addition, DCF covers the Tripartite Board requirements thoroughly as part of the CSBG monitoring process.

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

- Annually
- Semiannually
- Quarterly
- Monthly
- Other

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

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

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 Technical Assistance 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.

11.4 Does the State permit public eligible entities to use, as an alternative to a Tripartite Board, “another mechanism specified by the State to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs” as allowed under Section 676B(b)(2) of the CSBG Act.

Yes No

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

Section 12

Individual and Community Eligibility Requirements

12.1. Required Income Eligibility: What is 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): _____% **[insert up to a 3 digit percentage]**
- Varies by eligible entity

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

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: For services with limited in-take procedures (where individual income verification is not possible or practical), how does the State ensure eligible entities generally verify income eligibility for services? An example of these services is emergency food assistance.

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: For services that provide a community-wide benefit (e.g., development of community assets/facilities; building partnerships with other organizations), does the State ensure eligible entities' services target and benefit low-income communities?

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. ROMA participation

In which performance measurement system will the State and all eligible entities participate, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act?

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

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

13.1a. If ROMA was selected in item 13.1, attach and/or describe the State's written policies, procedures, or guidance documents on ROMA.

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."

13.1.b If ROMA was not selected in item 13.1, describe the system the State will use for performance measurement.

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

DCF will require eligible entities to use the CSBG National Performance Indicators to measure their performance in promoting self-sufficiency, family stability, and community revitalization.

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

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

13.3. How does the State support the eligible entities in using the ROMA system (or alternative performance measurement system)?

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.

DCF supports the eligible entities in using the ROMA system in the following ways:

- 1) Providing ROMA training for eligible entities' staff: DCF's CSBG Contract Manager and a DCF Senior Trainer began the process of becoming certified ROMA trainers in 2014 and obtained certification in March of 2015. DCF has also provided funding to WISCAP to allow WISCAP to bring certified ROMA trainers from other states to help provide additional training for eligible entity staff during FFY2015. To date, the State's ROMA trainers have provided ROMA training to 175 staff from eligible entities. In addition, WISCAP brought in certified ROMA trainers from other states to train 49 more staff in 2015. Training events will continue in FFY2016 and 2017, with DCF and/or WISCAP offering ROMA training for eligible entity staff on at least an annual basis.*
- 2) Providing ROMA training for eligible entities' boards of directors: The CSBG Contract Manager has also begun providing ROMA training to eligible entities' boards of directors. DCF has the*

goal of making this training available to all eligible entities' boards of directors by September 30, 2017.

- 3) *Providing training and technical assistance related to the CSBG IS Survey: The CSBG Contract Manager provided a training session to help agency staff prepare to complete the 2014 IS Survey at the November 2014 quarterly WISCAP meeting. DCF will continue to provide this training on an annual basis at fall WISCAP meetings in FFY2016 and 2017. DCF also contracts with WISCAP to gather IS Survey reports from the eligible entities and provide the entities with technical assistance to assist them in completing their reports.*

13.4. Eligible Entity Use of Data: How is the State validating that the eligible entities are using data to improve service delivery?

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

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)?*
- *Does the agency have an agency wide database for tracking participant data? If not, how is the unduplicated count achieved for Section G of the CSBG IS Survey?*
- *What participant data does the agency collect and how does it use this data?*
- *Does the agency track if participants use multiple services?*
- *Can the agency pull reports on how many participants each individual program served 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.

Community Action Plans and Needs Assessments

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

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

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 previous to the contract year, which begins on January 1. DCF reviews and approves the applications prior to issuing contracts.

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

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

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. The next year in which Wisconsin’s eligible entities must conduct Community Needs Assessments is 2016, with the results due to DCF by October 1, 2016.

Agencies will use the 2016 Needs Assessment as the basis for strategic planning, development of new initiatives, expanding partnerships, and coordinating programming. DCF will review each of these Community Needs Assessments and Community Action Plans to ensure a clear relationship between the results of the assessment and the corresponding plans of the agencies.

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

14.1 Use of Funds Supporting Local Activities

CSBG Services

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

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

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 indicate on 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 a total of 30 programs that address the needs of youth in low-income communities. The following are some examples:

- *Five eligible entities operate Fresh Start programs, providing 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.*
- *Community Action Inc. operates 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.*

- *Couleecap operates Youth Employment and Skills (YES!) to provide at least 90 at-risk youth (ages 14-18) with employment and skills training in an effort to improve graduation and employment outcomes.*
- *Two eligible entities train community members about youth mental health. Indianhead Community Action Agency provides Question, Persuade, and Refer (QPR) training to raise awareness of youth depression and suicide, and to prepare community members to address suicide by understanding warning signs and to know what to do if they speak with someone who seems suicidal. Indianhead trained approximately 100 community members, teens, teachers, and school staff in QPR in 2014. Southwestern Wisconsin Community Action Program recently provided Mental Health First Aid for Adolescents training to approximately 100 individuals in the southwest region of the state.*
- *Lakeshore Community Action Program (CAP) is a major partner in the PATHs Program, a transitional living and case management pilot for youth aging out of foster care. Lakeshore CAP also operates Project ReNew, a new thrift store staffed by youth volunteers seeking work experience or community service hours. Lakeshore CAP will reinvest revenue earned by the store in the agency's youth programs.*
- *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 a CAA’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; links to items 7.9 and 7.10.]

Eligible Entity Service Delivery, Coordination, and Innovation

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

Eligible Entity Service Delivery System

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

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.

DCF’s monitoring process ensures that all eligible entities’ service delivery systems meet the following standards:

- *Services do not discriminate on the basis of race, color, national origin, sex, age, religion, or disability. In addition, eligible entities do not ban non-citizens from services solely on the basis of their immigration status unless such exclusion is authorized by another statute;*

- *Information about program participants is strictly confidential; eligible entities only share participants' information with other entities if the participants have release of information agreements in place; and*
- *The eligible entities demonstrate reasonable efforts to accommodate any low-income populations with limited English proficiency in their service areas through such measures as translated materials and signage, and/or bilingual staff or volunteers.*

Eligible Entity Linkages – Approach to Filling Service Gaps

14.3b. 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;

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

[No response; links to 9.3b.]

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

14.3c. **Note:** the State describes this assurance in the State Linkages and Communication section, item 9.3b.

[No response; links to 9.3b.]

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.

In addition, two eligible entities have launched successful, neighborhood-based revitalization projects:

- *Community Action, Inc.'s Merrill Neighborhood Project focuses on 25+ properties in a challenged, six-block area in the City of Beloit. Leveraging the agency's Fresh Start program, 22 vacant and/or abandoned properties have been purchased with the goal to convert most of them into healthy rehabilitated, affordable homeownership opportunities.*
- *Coulecap's project focuses on the City of La Crosse's Powell-Poage-Hamilton neighborhood, which has high levels of substandard housing and poverty. The city and a large healthcare corporation are seeking to redevelop parts of this neighborhood, and Coulecap has worked to ensure that the voices of local residents are heard in the redevelopment planning. The project is also bringing financial literacy education, credit counseling, and rental/home buying education to neighborhood residents. It will also help with critical home repairs; construct four new, affordable homes; and renovate a fifth.*

The following are two examples of fatherhood programs operated by eligible entities:

- *ADVOCAP's Father & Family Stability Project has proven to be very effective in helping low-income fathers break generational patterns of poverty by improving their ability to provide their families with economic, social, and emotional support. This program provides a combination of job development, on-the-job-training, other help to reduce barriers to employment, parenting education, and family enrichment events.*
- *Community Action, Inc.'s Fatherhood Initiative collaborates with employers to fill entry level positions with young fathers who are struggling. During the program, the men learn soft skills, resume writing, interview skills, and parenting skills. In 2014, the program served 45 fathers, 90% of whom had been involved with the criminal justice system. To date, 77% have been placed in employment.*

In FFYs 2016 and 2017, 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, 14 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 quarterly WISCAP 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 the State Linkages and Communication section, items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b.

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

State Coordination/Linkages: Low-income Home Energy Assistance

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

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

[No response; links to 9.2 and 9.5]

Federal Investigations

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

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

[No response; links to 10.13]

Funding Reduction or Termination

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

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

[No response; links to 10.7]

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

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

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

[No response; links to 9.6]

Eligible Entity Tripartite Board Representation

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

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

[No response; links to item 11.3]

Eligible Entity Community Action Plans and Community Needs Assessments

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

[No response; links to items 13.5 and 13.6]

State and Eligible Entity Performance Measurement: ROMA or Alternate system

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

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

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

Validation for CSBG Eligible Entity Programmatic Narrative Sections

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

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

[No response for this item]

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

SECTION 15 Federal Certifications

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

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)

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

Alternate II. (Grantees Who Are Individuals)

- (a) The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;

- (b) If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other designee, unless the Federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.

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

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

15.3 Debarment

CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS

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

Primary Covered Transactions

Instructions for Certification

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

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

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

Primary Covered Transactions

- (1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:
 - (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;
 - (b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal

- offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
- (c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
 - (d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.
- (2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

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

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
- (2) The certification in this clause is a material representation of fact upon which reliance was
- (3) placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
- (4) The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.
- (5) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.
- (6) The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48

CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.

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

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

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

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

15.4 Environmental Tobacco Smoke

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

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

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



SCOTT WALKER
OFFICE OF THE GOVERNOR
STATE OF WISCONSIN

P.O. Box 7863
MADISON, WI 53707

August 15, 2013

Jeannie Chaffin, Director
Department of Health and Human Services
Administration for Children and Families
Office of Community Services
Community Services Block Grant Program
370 L'Enfant Promenade S.W., 5th Floor West
Washington, D.C. 20447

Dear Ms. Chaffin:

I hereby continue to designate the Wisconsin Department of Children and Families as the single state agency responsible for administering the Community Services Block Grant (CSBG) and responsible for complying with all certifications and assurances required by CSBG.

I hereby delegate authority to sign agreements and assurances to Department Secretary Eloise Anderson. At Secretary Anderson's direction, Deputy Secretary Joan Hansen is designated as the primary signatory authority. In the event Joan Hansen is unavailable, Division of Family and Economic Security Administrator, Kris Randal is the delegated alternate signature authority. All award letters are to be sent directly to:

Wisconsin Department of Children and Families
201 East Washington Avenue, Second Floor
P.O. Box 8916
Madison, WI 53708-8916

We look forward to continuing to work with you on this important grant.

Sincerely,

A handwritten signature in black ink, appearing to be "S. Walker".

Scott Walker
Governor



201 East Washington Avenue, Room A200
P.O. Box 8916
Madison, WI 53708-8916
Telephone: 608-267-0513
TTY: 608-261-6971

ATTACHMENT 2: Hearing Notice and Minutes

Governor Scott Walker
Secretary Eloise Anderson

Division of Family and Economic Security
Bureau of Working Families

OPEN MEETING NOTICE

For Public Review and Comment on the
**Wisconsin State Application and Plan for the Administration of the
Community Services Block Grant (CSBG) Program for
Federal Fiscal Years (FFYs) 2016-2017**

Friday, July 17, 2015
9:00 to 10:00 a.m.

Room H204
201 East Washington Avenue, Second Floor
(GEF 1 Building)
Madison, Wisconsin

- I. Welcome and Introductions
- II. Brief Overview of the Community Services Block Grant (CSBG) and the Wisconsin Plan
- III. Public Comment

Contact person: Katie Castern
(608) 267-8949
Katie.Castern@wisconsin.gov

Accessibility: The GEF 1 building at 201 East Washington Avenue is disability accessible through the East Washington Avenue entrance. An elevator within the building is disability accessible. The conference room for this meeting is on the eastside of the building and is disability accessible. Please contact Rebecca Brueggeman if any accommodations are needed.

Cc: Wisconsin's Community Action Agencies and Limited Purpose Agencies
Wisconsin Community Action Program Association (WISCAP)
Legislature and administrative offices in the Wisconsin State Capitol
Posting at the Department of Children and Families in the GEF 1 building, Second Floor, 201 East Washington Avenue, Madison, Wisconsin
Posting on the Department of Children and Families website



***Combined Legislative/Public Hearing on Wisconsin's Community Services
Block Grant (CSBG) State Plan for Federal Fiscal Years (FFYs) 2016-2017***

Minutes

Date: Friday, July 17, 2015

Time: 9:00 a.m

Location: 201 East Washington Avenue, Room H204, Madison, Wisconsin

| In Attendance |
|--|
| Rebecca Brueggeman, Section Chief, Department of Children and Families |
| Katie Castern, CSBG Contract Manager, Department of Children and Families |
| Cecilia Dever, Executive Director, Community Action Inc. of Rock and Walworth Counties |
| Bob Jones, Executive Director, Wisconsin Community Action Program Association (WISCAP) |
| Laura Laux, Grant Compliance Manager, Community Action Inc. of Rock and Walworth Counties |
| Margaret McMahon, Director, Bureau of Working Families, Department of Children and Families |
| Mary Patoka, President and CEO, CAP Services, Inc. |
| Libby Rowe, Associate Director, Community Action Coalition for South Central Wisconsin, Inc. <i>(by telephone)</i> |
| Char Thompson, Executive Director, Foundation for Rural Housing |

Introduction:

Katie Castern welcomed everyone to the meeting and asked them to introduce themselves.

Katie explained that the purpose of the meeting is to get input from the public and stakeholders and answer questions about the draft CSBG State Plan for FFYs 16-17. This is a combined public and legislative hearing as DCF invited the two legislative committees that oversee the Department's issues, which are the Senate Committee on Health and Human Services and the Assembly Committee on Children and Families. The CSBG State Plan is due to the federal Office of Community Services by September 1, 2015. This is a planning process the state undertakes every two years; Wisconsin was able to choose between an annual or biennial planning cycle and selected a biennial cycle.

Katie explained the purpose of the State Plan is to outline how DCF will meet the federal requirements for administering CSBG funds for the state. She pointed out that this plan is different than in past years as it reflects new Organizational Standards for agencies that receive

ATTACHMENT 2: Hearing Notice and Minutes

CSBG funds as well as new Accountability Measures for the state offices that administer the CSBG funds. This plan will feed directly into a new annual report through which DCF will report its performance in terms of achieving the goals of the plan. The draft plan is available for review on DCF's website. At this point, DCF asked for comments.

Comments on the draft CSBG State Plan:

Char Thompson stated that the Foundation for Rural Housing supports the State Plan and acknowledged that her organization is mentioned on page 30 of the draft State Plan. Char described the importance of CSBG funds to Rural Housing's ability to serve 705 households in the last year, and stated that CSBG has been essential in terms of matching state Critical Assistance funding.

Char also raised a concern that on page 43, the draft State Plan states the definition of households for determining participant income eligibility is based on individuals being related by birth or marriage. She also noted that determining eligibility for CSBG-funded services with the federal poverty guidelines causes additional administrative work for Rural Housing as its other funding uses the U.S. Department of Health and Human Services' Area Median Income to determine participant eligibility.

Cecilia Dever stated that she appreciated that the local agencies were involved in the process of developing the State Plan.

Mary Patoka submitted written testimony, which is attached. She also stated that CAP Services supports the State Plan. Mary described the importance of CSBG funds' flexibility in helping local agencies to research and create programs to meet the needs of their communities. She asked for further discussion on the \$50,000 in discretionary funds that is planned for innovative initiatives each year and recommended that DCF have realistic expectations in terms of the results that this relatively small amount of funding can produce in a single year. She explained that it typically takes two to three years for a new program to produce good outcomes and urged DCF to consider using these funds in ways that would support innovation throughout the statewide network of CSBG-funded agencies.

Bob Jones read testimony from WISCAP, which is attached.

At 9:35 a.m., with no further comments from the attendees, Rebecca Brueggeman called for the hearing to be adjourned and thanked everyone for their participation.



WISCONSIN DEPARTMENT OF
CHILDREN AND FAMILIES

**Community Services Block Grant (CSBG) Monitoring
for**

Agency

Dates of monitoring visit

Agency Information

Number of employees: ____

Total revenue for current year (anticipated): \$ ____

Current CSBG allocation: \$

Counties served:

Number of locations/program sites:

Monitoring Process Checklist:

Agency name _____

| TASK | TARGET DATE FOR COMPLETION | DATE ACCOMPLISHED |
|--|----------------------------|-------------------|
| Dates are selected for the agency’s onsite review four to five weeks in advance. | | |
| <p>Pre-Monitoring Materials Request Memo sent to agency executive director including:</p> <ul style="list-style-type: none"> • Board Roster Form to be returned within one week • CSBG Funded Programs Form to be returned within three weeks | | |
| IRS Form 990 obtained from Guidestar and last three years’ financial statements obtained from DCF’s Fiscal Integrity and Audit Section | | |
| Board Roster Form returned by agency | | |
| Board Survey sent out and requested to be returned within two weeks. | | |
| Board Survey returned by requested date by the majority of members | | |
| Materials listed in the Pre-Monitoring Materials Request Memo returned by the agency | | |
| CSBG Funded Programs Form returned by the agency | | |
| Step I. – Contract Compliance Checklist completed | | |
| Step II. – Pre-Monitoring Desk Review completed | | |
| Step III. – Analysis of Board Survey Results completed | | |
| Step IV. – Onsite Monitoring Visit completed | | |
| Step V. – Monitoring Report completed and sent to the agency within 30 days of the onsite review | | |
| Corrective Action Plan sent to DCF within 60 days | | |
| DCF response to the Corrective Action Plan sent within 30 days | | |

Step I. Contract Compliance Checklist

Agency name _____

Date this step was completed _____

| Materials that agencies are required to submit | Is the agency in compliance? | Notes |
|---|------------------------------|--|
| Most recent audit (<i>Org. Standard 8.1, 8.2</i>) | | Were there any audit findings, deficiencies, and/or weaknesses? If so, have all issues been addressed? |
| Affirmative Action Report | | |
| Civil Rights Compliance Letter of Assurance | | |
| Board minutes | | |
| Annual CSBG Information System (IS) Survey (<i>Org. Standard 9.4</i>) | | |

Is the agency's corporate status up to date as shown on the WI Department of Corporations website?

Yes / No

Step II. Pre-Monitoring Desk Review

Date materials were requested _____ Date materials were received _____

| Governance | Materials to review | Desk review checklist | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|---|--|-------------------------------------|-----|----|---|--|--|---|--|--|--|--|--|---|--|--|--|--|--|------------------------------------|--|--|-------------------------|--|--|---|--|--|---------------------------------|--|--|------------------------|--|--|--------------------------------|--|--|---|--|--|---------------------------|--|--|
| | Board roster form | <p>Tripartite structure (<i>Org. Standard 5.1</i>) Yes / No</p> <p>Is the number of members in alignment with bylaws? Yes / No</p> <p>Number of board members ____ (<i>DCF Contract and WI State Statute stipulate 15 to 51.</i>)</p> <p>Have any seats been open for longer than allowed by bylaws? Yes / No</p> <p>Notes:</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| A copy of the bylaws, along with information about when they were last reviewed by the board and when/if they were last reviewed by an attorney | <p>Were the bylaws reviewed by the board in the last five years? Yes / No</p> <p style="padding-left: 40px;">Date of last review by the board _____</p> <p>Were the bylaws reviewed by an attorney within the last five years? (<i>Org. Standard 5.3</i>) Yes / No</p> <p style="padding-left: 40px;">Date of last review by an attorney _____</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Do the bylaws define the following:</th> <th style="text-align: center;">Yes</th> <th style="text-align: center;">No</th> </tr> </thead> <tbody> <tr> <td>Tripartite board composition (<i>CSBG Act, Org. Standard 5.1</i>)</td> <td></td> <td></td> </tr> <tr> <td>Democratic selection of low-income board members (<i>CSBG Act, Org. Standard 5.2</i>)</td> <td></td> <td></td> </tr> <tr> <td>How board members are recruited and seated</td> <td></td> <td></td> </tr> <tr> <td>How the board elects public official board members vs. setting aside seats for specific public positions (<i>best practice</i>)</td> <td></td> <td></td> </tr> <tr> <td>Public officials or their representatives serve only while the official is in office or his/her appointed position (<i>OCS IM 82 recommendation</i>)</td> <td></td> <td></td> </tr> <tr> <td>Meeting frequency and board quorum</td> <td></td> <td></td> </tr> <tr> <td>Number of board members</td> <td></td> <td></td> </tr> <tr> <td>Procedures for removing board members for nonattendance</td> <td></td> <td></td> </tr> <tr> <td>Procedure for filling vacancies</td> <td></td> <td></td> </tr> <tr> <td>Board responsibilities</td> <td></td> <td></td> </tr> <tr> <td>Committees and their authority</td> <td></td> <td></td> </tr> <tr> <td>Separate finance and personnel committees</td> <td></td> <td></td> </tr> <tr> <td>Officers and their duties</td> <td></td> <td></td> </tr> </tbody> </table> <p>Notes:</p> | | | Do the bylaws define the following: | Yes | No | Tripartite board composition (<i>CSBG Act, Org. Standard 5.1</i>) | | | Democratic selection of low-income board members (<i>CSBG Act, Org. Standard 5.2</i>) | | | How board members are recruited and seated | | | How the board elects public official board members vs. setting aside seats for specific public positions (<i>best practice</i>) | | | Public officials or their representatives serve only while the official is in office or his/her appointed position (<i>OCS IM 82 recommendation</i>) | | | Meeting frequency and board quorum | | | Number of board members | | | Procedures for removing board members for nonattendance | | | Procedure for filling vacancies | | | Board responsibilities | | | Committees and their authority | | | Separate finance and personnel committees | | | Officers and their duties | | |
| Do the bylaws define the following: | Yes | No | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Tripartite board composition (<i>CSBG Act, Org. Standard 5.1</i>) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Democratic selection of low-income board members (<i>CSBG Act, Org. Standard 5.2</i>) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| How board members are recruited and seated | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| How the board elects public official board members vs. setting aside seats for specific public positions (<i>best practice</i>) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Public officials or their representatives serve only while the official is in office or his/her appointed position (<i>OCS IM 82 recommendation</i>) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Meeting frequency and board quorum | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Number of board members | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Procedures for removing board members for nonattendance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Procedure for filling vacancies | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Board responsibilities | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Committees and their authority | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Separate finance and personnel committees | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Officers and their duties | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | <i>Materials to review</i> | <i>Desk review checklist</i> |
|---------------------------|---|---|
| Governance (Cont.) | Schedule of board meetings for the year and board minutes from the past 12 months | <p>How many times has the board met in the past 12 months? _____ Of the __ total meetings in the past 12 months, __ had a quorum. Did the frequency of board meetings meet the frequency called for in the bylaws? (Org. Standard 5.5) Yes / No Is attendance of board members in alignment with the bylaws? Yes / No Are there any areas in which the board is out of compliance with its bylaws? Yes / No If yes, what are the areas? _____</p> <p>Notes:</p> |
| | Conflict of interest policy for board members | <p>Is there a policy in place requiring board members to sign a Conflict of Interest agreement at least every two years? (Org. Standard 5.6) Yes / No</p> |
| | Board orientation manual or similar materials | <p>Is the board orientation manual aligned with the agency's bylaws and CSBG requirements? Yes / No</p> <p>Notes:</p> |

| | Materials to review | Desk review checklist |
|------------------------|--|---|
| Human Resources | Organization chart | Notes and follow-up questions for the onsite visit: |
| | Personnel policies and procedures and the date they were last reviewed by an attorney and approved by the board | <p>Reviewed by an attorney and approved by the board within the last five years? (Org. Standard 7.1) Yes / No</p> <p>Date of last board approval _____</p> <p>Does it include the following:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Explanation of fringe benefits, including leave and holidays <input type="checkbox"/> Written discipline and termination policies <input type="checkbox"/> Whistleblower/anti-retaliation (Org. Standard 7.7) <input type="checkbox"/> Travel policy <input type="checkbox"/> Non-discrimination statement <input type="checkbox"/> Conflict of interest statement <input type="checkbox"/> Nepotism statement <input type="checkbox"/> Definition of work day, work week, and hours <input type="checkbox"/> Overtime rules – overtime must have proper approval <input type="checkbox"/> Policy requiring all staff driving on company business to have a current driver’s license <p>Notes:</p> |
| | Conflict of interest policy and agreement | Is it signed by staff and board members each year and reviewed every two to three years? Yes / No |
| | Succession plan, if available | <p>Does the succession plan have the following elements: (Org. Standard 4.5)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Approved by the board <input type="checkbox"/> Covers an emergency, unplanned short-term absence of three months or less <input type="checkbox"/> Outlines the process for filling a permanent vacancy <p>Notes:</p> |

ATTACHMENT 3: CSBG Monitoring Tool

| | | | | | |
|--|--|---|-------------|-------------|-------------|
| Fiscal | Materials to review | Desk review checklist | | | |
| | Most recent IRS Form 990* | <p>Is the agency up-to-date in terms of filing the Form 990? Yes / No</p> <p>Do board minutes record approval of the Form 990? (Org. Standard 8.6) Yes / No</p> <p>Are legislative lobbying activities noted? Yes / No If yes, did the agency elect 501(h) and/or provide specific information? Yes / No Notes:</p> <p>Do pages 1 and 9-12 of the IRS Form 990 match the financial statement? Yes / No Notes:</p> | | | |
| | Financial statements and balance sheet from the last three years** | | 2011 | 2012 | 2013 |
| | | Current ratio | | | |
| | | Available cash on hand | | | |
| | | Grants receivable as a % of annual grant revenue | | | |
| | Notes: | | | | |
| General ledger supporting two nonconsecutive CORE reports | <p>Are the CORE reports supported by the general ledger? Yes / No</p> <p>Are CSBG costs allowable? (CSBG Act and OMB Circular) Yes / No</p> <p>Are any costs classified as “miscellaneous” or not defined? Yes / No</p> <p>Specific cost items for which the contract manager will review supporting documentation during the onsite visit:</p> | | | | |
| Fiscal Policies and Procedures | <p>Was this reviewed within the past two years, with any changes approved by the board? (Org. Standard 8.10) Yes / No</p> <p>The Agency has a written procurement policy, which has been reviewed by the board within the past five years. (Org. Standard 8.11) Yes / No</p> <p>Does the agency have an indirect cost rate or use direct cost allocation? (Org. Standard 8.12) Indirect cost rate / direct cost allocation</p> <p>Does the general ledger show evidence that the agency follows its cost allocation plan? Yes / No</p> <p>Internal controls are outlined in the fiscal policies and procedures Yes / No</p> | | | | |
| List of entities with which the agency subcontracts CSBG funds and the contract amounts | <p>Did the agency have prior written approval from DCF for subcontract(s) using CSBG funds as required by DCF contract? Yes / No / Not applicable</p> | | | | |

*The contract manager will review the IRS Form 990 on the Guidestar website if it is available. Otherwise, the contract manager will request a copy from the agency.

**The contract manager will obtain the financial statements from DCF’s Fiscal Integrity and Audit Section.

| Programs and Management | Materials to review | Desk review checklist |
|--------------------------------|--|--|
| | <p>Most recent agency strategic plan</p> | <p>Does the agency have a current strategic plan? (<i>Org. Standard 6.1</i>) Yes / No</p> <p>Does the plan address reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient? (<i>Org. Standard 6.2</i>) Yes /No</p> <p>Does the plan contain family, agency, and/or community goals? (<i>Org. Standard 6.3</i>) Yes /No</p> <p>Notes and follow-up questions for the onsite visit:</p> |
| | <p>List of CSBG funded programs for the current contract period, noting which, if any, provide direct financial assistance to participants with CSBG dollars, total amount of CSBG in current year’s program budget, and the percent of the total program budget that CSBG funds represent</p> | <p>Individual program(s) that the contract manager will review during the onsite visit:</p> <ol style="list-style-type: none"> 1. 2. 3. <p>Notes:</p> |
| | <p>List of other federal programs under which the agency provides services</p> | <p>Notes and follow-up questions for the onsite visit:</p> |
| | <p>List of staff members (including title and role) with CSBG funded positions (any amount) and the percentage of time allocated to CSBG in the past 12 months</p> | <p>Positions that the contract manager will review during the onsite visit:</p> <ol style="list-style-type: none"> 1. 2. 3. <p>Notes:</p> |

Step III. Review and Summarize Results of the Board Member Survey

Date board surveys were sent out _____
Number of board surveys sent out _____
Requested return date _____
Number of board surveys that are returned _____
Percent of board members who completed the survey _____
Analysis of board survey answers, to be completed prior to the onsite monitoring visit:

Step IV. Onsite Monitoring Visit

| Sample Onsite Visit Schedule | |
|--|----------------------|
| Day 1 | |
| 1) Meeting with executive director and management team and tour of facility* | 8:30 to 9:30 am |
| 2) Onsite board materials review | 9:30 to 10:00 am |
| 3) Interview with board chair | 10:00 to 11:00 am |
| 4) Onsite HR materials review | 11:00 to 11:30 am |
| 5) Interview with the HR manager | 11:30 am to 12:00 pm |
| Lunch break | 12:00 to 12:45 pm |
| 6) Onsite review of specific items from the pre-monitoring review of the general ledger | 12:45 to 1:15 pm |
| 7) Interview with the chief financial officer and follow-up from pre-monitoring review of fiscal materials | 1:15 to 2:00 pm |
| 8) Programs and management onsite material review | 2:00 to 2:30 pm |
| 9) Management interview with executive director and appropriate program managers | 2:30 to 3:30 pm |
| 10) Interview with the planner on program evaluation, ROMA, and community needs assessments | 3:30 to 4:30 pm |
| Wrap-up for Day 1 | 4:30 to 5:00 pm |
| Day 2 | |
| 11) Specific program reviews: interview with program manager and file review for one to three programs | 8:30 to 10:30 am |
| 12) Exit interview prep | 10:30 to 11:00 am |
| 13) Exit interview | 11:00 am to 12:00 pm |

*If the agency has multiple sites, the contract manager may work with the agency to schedule time to tour the other locations, most likely during the afternoon before Day 1.

1) **Meeting with Executive Director and Management Team** (30 minutes)

The meeting agenda will include: introductions, an overview of the guiding principles for CSBG monitoring (mutual respect, open communication, joint problem solving), a review of the schedule for the monitoring visit, and a report on the contract manager’s initial impressions from the pre-monitoring desk review.

The contract manager will also request materials at this time for onsite review: participant files from specific CSBG funded program(s), origins of specific data from the agency’s most recent CSBG Information Survey, and back-up for specific expense items from the general ledger.

2) **Governance Onsite Material Review:** (30 minutes)

- **Board orientation manual/materials** - *If this could not be sent by email for the pre-monitoring desk review, the contract manager will review this onsite and complete the questions on page 4 at this time.*
- **Evidence that board members receive copies of the bylaws every two years is observed by the contract manager** (*Org. Standard 5.4*) Yes / No
- **Copies of signed conflict of interest statements in board member files within the past two years are observed by the contract manager** (*Org. Standard 5.6*) Yes / No

3) **Governance Interview with the Board Chair, other Board Members who are available, and Executive Director (optional):** (60 minutes)

The list of questions may be shorter if the Board Survey results provide answers to some of the questions.

- a. **Have there been any updates to the list of board vacancies provided on the Board Roster during the pre-monitoring phase?** Yes / No
If yes, describe: _____
- b. **Is a structured orientation provided for new board members within 6 months of being seated?** (*Org. Standard 5.7*) Yes / No
- c. **Does the board have a fiscal expert?** Yes / No
If yes, what are his or her qualifications?
- d. **Does the board include an attorney?** Yes / No
If no, how does the agency obtain legal advice?
- e. **Who leads the board meetings?** _____
- f. **How is board training provided?** (*Org. Standard 5.8 states that board members should have received some type of training within the last two years.*)
- g. **When was the last time the board received ROMA training?**
 - **Who provided the most recent ROMA training?**

- h. **Are the elected or appointed officials active?** Yes / No
- **If a public official sends a representative, is there a process set through which the representative keeps the official abreast of the agency's work?** Yes / No
- i. **Do board members sign a conflict of interest agreement and does the board review this document every two to three years?** Yes / No
- j. **Is there a democratic process for selecting representatives of the low-income community?**
Yes / No
- **If yes, what is the process?**
- k. **What policies are in place to ensure that low-income individuals, community organizations, religious organizations, or representatives of low-income organizations can petition for representation on the board?**
- l. **In general, is the ethnic/racial/cultural make-up of the board representative of the community, including the low-income communities the agency serves?**
- m. **Do any board members who represent a particular neighborhood or low-income area reside in the area they represent?** Yes / No / NA
- n. **Has the board adopted a code of ethics or code of conduct?** Yes / No
- o. **Is the mission statement in the agency's Board Manual?** Yes / No
- **Does the mission statement address poverty?** Yes / No
 - **Has the board reviewed it in the past five years?** Yes / No
 - **Has the board reviewed all programs and services in the past five years to determine if they are in alignment with the mission?** (*Org. Standard 4.1*) Yes / No
- p. **Does the board approve the agency's annual budget?** (*Org. Standard 8.9*) Yes / No
- q. **Does the board receive financial reports at each meeting including Revenue and Expenditures reports that compare budget to actual for each program, and a balance sheet/statement of financial position?** (*Org. Standard 8.7*) Yes / No
- If yes, who presents the financial reports?** _____
- r. **Does the Board have a Finance Committee?** Yes / No
- **If yes, how many members?** _____

- How often does it meet? _____
 - Are minutes of the Finance Committee meetings provided to the board? Yes / No
 - What items are routinely covered by the Finance Committee?
- s. Does the board have committees structured to fully address its fiduciary and governance responsibilities? Yes / No
- t. From your perspective, what are the agency's strengths and challenges?
- u. How does the agency's board fulfill its role of setting annual and long range goals?
- v. Does the board receive briefings on and/or copies of agency reviews or evaluations produced for governmental or other funding sources? Yes / No
- w. What are the most significant contributions that board members have made to the success of the agency in the past three years?
- x. What issues are the standing committees currently addressing?
- y. What information do you receive about program activities, performance, and service outcomes? What format/forums and how often? (*Org. Standard 5.9*)
- z. Does the board undertake any type of self-evaluation? Yes / No
- If yes, how and when?
- aa. What are the current board's strengths? What are its challenges?
- bb. What is the process for identifying and recruiting new board members?
- cc. How effectively has the board been able to maintain its tripartite balance?
- What challenges are associated with maintaining that balance?

dd. When did the board last revise its bylaws? _____

- Are revisions needed to the current bylaws, and if so, is there a process and timeline to accomplish that in the current year?

ee. What is the annual executive director evaluation process and what is the board's role in it? Is the evaluation process performed annually? (*Org. Standard 7.4*) Yes / No

ff. Does the board review and approve the executive director's compensation every 12 months? (*Org. Standard 7.5*) Yes / No

gg. Is there any training or technical assistance that you feel would benefit the board?

4) **Human Resources Onsite Material Review:** (30 minutes)

- Updated (not more than five years ago) job descriptions for all staff are observed by the contract manager. (*Org. Standard 7.3*) Yes / No
- The conflict of interest policy and signed staff agreements are observed by the contract manager. Yes / No
- Staff have received regular written performance evaluations in the past three years and completed performance evaluations are observed by the contract manager. (*Org. Standard 7.6*) Yes / No

5) **Interview with Human Resources Manager or Equivalent:** (30 minutes)

- a. Follow-up questions on the succession plan as noted on page 5.
- b. Follow-up questions on the organizational chart as noted on page 5.
- c. In addition to salary, what benefits does the agency provide staff?

- d. Have staff funded by CSBG (25% or more) participated in any trainings or conferences in the past two years? Yes / No
 - Do CSBG funded staff generally attend WISCAP events? Yes / No
- e. Have there been any vacancies in CSBG funded positions in the past 12 months? Yes / No
 - If yes, what position(s) and for how long?
- f. How do staff members make training needs known to the agency?
 - Is there any training or technical assistance that would be beneficial to staff or volunteer development in helping them achieve successful outcomes for participants and the agency?
- g. How are ethical standards (for staff conduct, including interaction with participants) communicated and enforced?
- h. What challenges (if any) do you encounter in recruiting and retaining qualified staff?
- i. Has the agency conducted salary surveys within the past two years? Yes / No
- j. Has the agency been able to support COLA increases for all employees over the last three years? Yes / No

- If no, why not?
- k. Does the agency expect COLA increases this year? Yes / No
- l. Are merit based increases available to employees? Yes / No
- m. Are any relatives of current senior management or board members employed by the agency?
Yes / No
- If yes, what are the relationships?
- n. Have any employees received assistance under any of the agency's programs in the last three years? Yes / No
- If yes, were conflict of interest policies followed? Yes / No
- o. Are all employees classified as either exempt or nonexempt? Yes / No
- p. Is employee information kept in a locked, secure, non-public location? Yes / No
- q. How does the agency ensure that personnel policies are available to all staff and that staff are notified of changes? (*Org. Standard 7.2*)
- r. Do all staff participate in a new employee orientation within 60 days of hire? (*Org. Standard 7.8*) Yes / No

6) **Fiscal Onsite Review of Specific Cost Items** (30 minutes)

The contract manager will request supporting documentation for specific items selected from the pre-monitoring review of the general ledger.

| Cost item | Date of expense | Amount | Documentation observed by the contract manager |
|-----------|-----------------|--------|--|
| | | | |
| | | | |
| | | | |
| | | | |

7) **Interview with the Chief Financial Officer** (45 minutes)

a. **Does the organization engage in any lobbying, which would include having staff or volunteers meet with, call, or email elected officials regarding state or federal legislation, including appropriations, or referenda or ballot initiatives?** (*Definition of lobbying from CAPLAW’s “Lobbying Q & A”, Spring 2011*) Yes / No

- **If yes, what policies and procedures are in place to ensure that only non-federal unrestricted funds are used to pay for lobbying expenses?**

b. **What policies and procedures does the organization have in place to ensure that no CSBG programs are affiliated or identified with, or use any CSBG funds to support the following:**

- **Partisan or non-partisan political activity, or any political activity associated with a candidate, or contending faction or group, in an election for public or party office;**
- **Voter registration activities; or**
- **Providing voters with transportation to the polls or similar assistance?** (*CSBG Act*)

c. **Are procedures in place to ensure that CSBG funds are not used to purchase, construct, or improve (other than low-cost residential weatherization or other energy-related home repairs) any building or facility, unless a waiver is received from OCS?** (*CSBG Act*) Yes / No

d. **Has an agency-wide risk assessment been completed within the past two years?** (*Org. Standard 4.6*) Yes / No **If yes, date of last risk assessment:** _____

- **If yes, was it reviewed by the board?** Yes / No

e. **Does the agency have a written record retention policy in place?** (*Org. Standard 8.13*) Yes / No

- If yes, what is the policy?
- f. Are all agency computers password protected? Yes / No
- What back-up does the agency have for data and electronic systems?
 - Is there a disaster recovery plan in place? Yes / No
- g. Describe the payroll process.
- Who approves the payroll?
- The contract manager will ask the chief financial officer or designee to walk through one or two samples.
- h. Bank Reconciliations: Does the agency perform these at least quarterly? Yes / No
- Does one person perform the reconciliation and another sign off on it? Yes / No
- i. Has the agency solicited bids for its audit within the past five years? (*Org. Standard 8.5*) Yes / No
- j. Are all required filings and payments related to payroll withholdings completed on time? (*Org. Standard 8.8*) Yes / No
- k. Does the agency's auditor present the audit to the board or a committee of the board?
 Yes No (*Org. Standard 8.3*)
- l. Does the board formally receive and accept the audit? Yes No (*Org. Standard 8.4*)
- m. Does the finance committee analyze expenditure reports and provide a report to the board?
 Yes No
- n. When expenses exceed budget, how is this dealt with?
- o. How are costs allocated to programs?
- p. How many bank accounts does the agency have? _____
- q. Does the finance committee receive regular reports on the status of the accounts? Yes No
Who has access to the bank accounts?
- r. Is there a periodic review of financial operation of the agency? Yes No
- s. Does the finance committee play a role in the development of agency fiscal policies? Yes No

8) Programs and Management Onsite Material Review: (30 minutes)

The contract manager will request supporting documentation for specific data from the agency's recent CSBG Information System (IS) Survey. This will be the origins of data reported in Sections E, F, and G of the CSBG IS Survey, as well as outcomes reported for the National Performance Indicators (NPI).

| Data | Supporting documentation observed by the contract manager |
|------|---|
| | |
| | |
| | |
| | |

9) Management Interview with the Executive Director and Appropriate Program Management Staff:
(60 minutes)

- a. **Beyond board membership, how does the agency include low-income people in its activities?**
(Org. Standard 1.1)

- b. **Does the agency have a system in place to gather customer service satisfaction feedback from program participants?** Yes / No
If yes, describe the system:
 - **Is the feedback shared with the board of directors?** *(Org. Standard 1.3)* Yes / No

- c. **How does the agency communicate its activities and results to the public?** *(Org. Standard 2.3)*

- d. **How does the agency ensure that programs neither discriminate on the basis of race, color, national origin, sex, age, religion, or disability as required by the CSBG Act nor ban non-citizens solely on the basis of their immigration status unless such exclusion is authorized by another statute?** *(OCS IM 30)*

- e. **Are all agency facilities accessible to persons with disabilities?** Yes / No

- f. Has the agency taken appropriate steps (signage, bilingual staff, translated materials, etc.) to address language barriers that exist for low-income communities in its service area? Yes / No
- If yes, describe:
- g. Describe what policies and procedures the agency has in place to ensure privacy and confidentiality of participant information.
- h. In the past three years, has the agency received a monitoring visit or review of an agency program funded by another federal or state grant/contract? Yes / No
- Were any findings or corrective action plans generated as a result? Yes / No
- If yes, describe:
- i. Do all CSBG funded programs have participant eligibility criteria in compliance with federal regulations? Yes / No
- Is there an agency-wide policy and procedure for income qualification (125% of federal poverty guideline) for participants of CSBG supported programs? Yes / No
- j. How does the agency refer single custodial parents to the local child support agency? (*CSBG Act*)
- k. Does the agency require drug testing for any programs? Yes / No
- If yes, do 100% of people who test positive receive appropriate AODA referrals? (*CSBG Act*) Yes / No
- l. Does the agency have a record retention policy for participant files? Yes / No
- m. What are the most significant sources of referrals to the agency's programs?
- n. What agencies are primary or vital partners in identifying and serving agency participants?
- How does the agency work with its partners for specifically identified purposes? (*Org. Standard 2.1*)
 - Do these partners include other anti-poverty organizations in the area? (*Org. Standard 2.1*) Yes / No
- o. What community supports are important to agency success and how do they contribute to that success? (Be specific: business, religious organizations, academic institutions, etc.)

- p. **Within the agency's service community (or communities), does the agency participate in any networks, councils or other groups that foster communication and collaboration on policy, practice, or service delivery?**
- q. **What linkages exist between governmental and social services in your agency's service area?**
- **What is the agency's role in those connections?**
- r. **What is the agency's referral, coordination of services, and collaborative relationship with the providers of the following services its area?**
- **Wisconsin Works**
 - **Emergency Assistance**
 - **Job Access Loans**
 - **Refugee services**

10) Interview with Planner: (60 minutes)

ROMA and Program Evaluation Questions for the Planner

- a. Are all agency programs tied to at least one ROMA objective (NPI)? Yes / No
- b. Which staff have received ROMA training? (*Org. Standard 7.9*) Yes / No
 - If yes, who provides it and how often is it done?
- c. In addition to service on the board and its committees, how does the agency use volunteers to support goals and outcomes in CSBG programs?
- d. How is volunteer data tracked for reporting on NPIs 2 and 3? (*Org. Standard 2.4*)
- e. How is board and staff training tracked for NPI 5.1?
- f. Does the agency have an agency wide database for tracking participant data? Yes / No
 - If not, how is the unduplicated count achieved for Section G of the CSBG IS Survey?
- g. What participant data do you collect and how do you use it?
 - Does the agency track if participants use multiple services? Yes / No
 - Can the agency pull reports on how many participants each individual program served during a specific period? (*Org. Standard 9.1*) Yes / No
- h. Does the agency have a system in place to track family, agency, and/or community outcomes? (*Org. Standard 9.2*) Yes / No
- i. Does the agency track and compare data from multiple years to see trends in agency success, customer satisfaction, or other areas? Yes / No
- j. In the past 12 months, has the agency presented to the governing board for review and action, an analysis of its outcomes and any operational or strategic program adjustments and improvements identified as necessary? (*Org. Standard 9.3*) Yes / No

- f. **What are some examples of programmatic changes made as a result of Community Needs Assessments in recent years?**
- g. **Was a Community Action Plan developed from the Community Needs Assessment?** Yes / No
- **If yes, was the Community Action Plan outcome-based, anti-poverty focused, and tied directly to the Community Needs Assessment?** (*Org. Standard 4.2*) Yes / No
- h. **Does the board receive an annual update on the success of specific strategies included in the Community Action Plan?** (*Org. Standard 4.4*) Yes / No
- i. **Does the agency have a current strategic plan?** Yes / No
- **If yes, when and how was it developed?**
 - **How does the agency assess progress on the strategic plan and report this progress to staff and the board?** (*Org Standards 6.1 and 6.5*)
 - **How does the agency include customer input/data from low-income people that was collected during the Community Needs Assessment in the strategic planning process?** (*Org. Standard 6.4*)
 - **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)?** Yes / No
 - **Does the agency use the services of a ROMA-certified trainer to assist in implementation?** (*Org. Standard 4.3*) Yes / No

12) Review of CSBG Supported Programs

This will be completed for one to three programs that use CSBG funds.

Program name _____

Description

Does the program align with the fundable activities outlined in Section 676(b)(1) of the CSBG Act? Yes / No

of files reviewed _____

Address the following questions after reviewing a sampling of participant files with the Participant Case File Worksheet:

| PARTICIPANT FILE REVIEW SUMMARY | Yes | No | Comments |
|---|------------|-----------|-----------------|
| Did the review of the participant files sampled indicate that all participants provided services with CSBG funds were eligible (with incomes at or below 125% of federal poverty guidelines)? | | | |
| Is there evidence of adequate tools and standardized procedures for determining and documenting participant eligibility? | | | |
| Is documentation such as a bill, voucher, and/or copy of the check retained in files for direct financial assistance provided? | | | |
| Were detailed case management activities thoroughly documented in the participant files? | | | |
| Were participants' goals mutually agreed to and documented? | | | |
| Were efforts to achieve goals documented? | | | |
| Were goals oriented toward self-sufficiency? | | | |
| Is there evidence that participants were referred to other programs in the community or area for needs beyond the program's scope? | | | |
| Is the agency taking appropriate steps to ensure privacy and confidentiality of participant information, such as secure files, confidentiality policies, private consultation space, etc.? | | | |
| Is there evidence that single custodial parents received child support agency referrals? | | | |
| Does the agency take a new program application once each contract year? If not, how does the agency ensure ongoing eligibility? | | | |
| Did the review of the documentation indicate that the services have helped participants become more self-sufficient? | | | |

Participant Case File Review Worksheet

Program name _____ File # _____

Date of intake _____ Date of exit (or currently enrolled) _____

1. Is there evidence that the participant meets CSBG income eligibility guidelines? Yes / No

If yes, what documentation was used to determine the participant's eligibility?

2. Type of services the participant received

3. Did the participant receive financial assistance? Yes / No

- If yes, description and amount

- If yes, is a copy of a bill, voucher, and/or check retained in the file? Yes / No

4. Is the participant a single custodial parent? Yes / No

- If yes, does the file contain evidence that he or she was referred to the local child support agency? Yes / No

- If yes, how is this documented in the file?

5. Other referrals documented in the file:

6. Did the participant receive case management services? Yes / No

- If yes, how are case management services documented?

- Are participant's goals and progress towards these goals clearly documented? Yes / No

Notes:

13) Exit Interview

The contract manager will go over preliminary findings with the executive director, board chair or other officer, and any other leaders the agency wishes to have present. The contract manager will share overall impression of agency's strengths along with any areas of concern and any areas where the contract manager has questions or needs more information.

CSBG Organizational Standards Assessment

Date _____

| <u>Maximum Feasible Participation – Category 1: Consumer Input and Involvement</u> | Location in Monitoring Tool | Agency is Meeting the Standard | Notes |
|---|------------------------------------|---------------------------------------|--------------|
| 1.1) The organization demonstrates low-income participation in its activities. | 9) a., p. 20 | | |
| 1.2) The organization analyzes information collected directly from low-income individuals as part of its triennial community needs assessment. | 11) b., p. 24 | | |
| 1.3) The organization has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the governing board. | 9) b., p. 20 | | |
| <u>Maximum Feasible Participation – Category 2: Community Engagement</u> | Location in Monitoring Tool | Agency is Meeting the Standard | Notes |
| 2.1) The organization has documented or demonstrated partnerships across the community, for specifically identified purposes; partnerships include other anti-poverty organizations in the area. | 9) n., p. 21-22 | | |
| 2.2) The organization utilizes information gathered from key sectors of the community in assessing needs and resources. This would include at minimum: community-based organizations, faith-based organizations, private sector, public sector, and educational institutions. | 11) b., p. 24 | | |
| 2.3) The organization communicates its activities and its results to the community. | 9) c., p. 20 | | |
| 2.4) The organization documents the number of volunteers and hours mobilized in support of its activities. | 10) d., p. 23 | | |
| <u>Maximum Feasible Participation – Category 3: Community Assessment</u> | Location in Monitoring Tool | Agency is Meeting the Standard | Notes |
| 3.1) The organization conducted a community needs assessment and issued a report within the past 3 years. | 11) a., p. 24 | | |
| 3.2) As part of the community assessment, the organization collects and includes current data specific to poverty and its prevalence related to gender, age, and race/ethnicity for their service area(s). | 11) b, p. 24 | | |
| 3.3) The organization collects and analyzes both qualitative and quantitative data on its geographic service area(s) in the community assessment. | 11) c., p. 24 | | |

CSBG Organizational Standards Assessment

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|--|------------------------------------|---------------------------------------|-----------------------------------|
| 3.4) The community assessment includes key findings on the causes and conditions of poverty and the needs of the communities assessed. | 11) e., p. 25 | | |
| 3.5) The governing board formally accepts the completed community assessment. | 11) d., p. 25 | | |
| <u>Vision and Direction – Category 4: Organizational Leadership</u> | Location in Monitoring Tool | Agency is Meeting the Standard | Notes |
| 4.1) The governing board has reviewed the organization’s mission statement within the past 5 years and assured that: 1) the mission addresses poverty; and 2) all programs and services are in alignment with the mission. | 3) p., p. 12 | | Year of most recent review: _____ |
| 4.2) The organization’s Community Action plan is outcome-based, anti-poverty focused, and ties directly to the community assessment. | 11) g., p. 25 | | |
| 4.3) The organization’s Community Action plan and strategic plan document the continuous use of the full ROMA cycle or comparable system (assessment, planning, implementation, achievement of results, and evaluation). In addition, the organization documents having used the services of a ROMA-certified trainer (or equivalent) to assist in implementation. | 11) i., p. 25 | | |
| 4.4) The governing board receives an annual update on the success of specific strategies included in the Community Action plan. | 11) h., p. 25 | | |
| 4.5) The organization has a written succession plan in place for the CEO/ED, approved by the governing board, which contains procedures for covering an emergency/unplanned, short-term absence of 3 months or less, as well as outlines the process for filling a permanent vacancy. | Pre-monitoring, p. 6 | | |
| 4.6) An organization-wide, comprehensive risk assessment has been completed within the past 2 years and reported to the governing board. | 7) d., p. 17 | | Year of last assessment: _____ |
| <u>Vision and Direction – Category 5: Board Governance</u> | Location in Monitoring Tool | Agency is Meeting the Standard | Notes |
| 5.1) The organization’s governing board is structured in compliance with the CSBG Act: 1) At least one-third democratically-selected representatives of the low-income community; 2) With one-third local elected officials (or their representatives); and 3) The remaining membership from major groups and interests in the community. | Pre-monitoring, p. 4 | | |

CSBG Organizational Standards Assessment

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|---|---|---------------------------------------|-----------------------------------|
| 5.2) The organization's governing board has written procedures that document a democratic selection process for low-income board members adequate to assure that they are representative of the low-income community. | Pre-monitoring, p. 4 | | |
| 5.3) The organization's bylaws have been reviewed by an attorney within the past 5 years. | Pre-monitoring, p. 4 | | Year of most recent review: _____ |
| 5.4) The organization documents that each governing board member has received a copy of the bylaws within the past 2 years. | 2), p. 11 | | |
| 5.5) The organization's governing board meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its bylaws. | Pre-monitoring, p. 5 | | |
| 5.6) Each governing board member has signed a conflict of interest policy within the past 2 years. | Pre-monitoring, p. 5 & 2), p. 11 & Board Survey, 16 | | |
| 5.7) The organization has a process to provide a structured orientation for governing board members within 6 months of being seated. | 3) c., p. 11 & Board Survey, 17 | | |
| 5.8) Governing board members have been provided with training on their duties and responsibilities within the past two years. | 3) g., p.11 | | |
| 5.9) The organization's governing board receives programmatic reports at each regular board meeting. | 3) z., p. 13 & Board Survey, 14 | | |
| <u>Vision and Direction – Category 6: Strategic Planning</u> | Location in Monitoring Tool | Agency is Meeting the Standard | Notes |
| 6.1) The organization has an agency-wide strategic plan in place that has been approved by the governing board within the past 5 years. | 11) i., p. 25 & Pre-monitoring, p. 8 | | Year of most recent review: _____ |
| 6.2) The approved strategic plan addresses reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient. | Pre-monitoring, p. 8 | | |
| 6.3) The approved strategic plan contains family, agency, and/or community goals. | Pre-monitoring, p. 8 | | |
| 6.4) Customer satisfaction data and customer input, collected as part of the community assessment, is included in the strategic planning process. | 11) i., p. 25 | | |
| 6.5) The governing board has received an update(s) on progress towards meeting the goals of the strategic plan within the past 12 months. | 11) i., p. 25 | | |

CSBG Organizational Standards Assessment

| <u>Operations and Accountability – Category 7: Human Resource Management</u> | Location in Monitoring Tool | Agency is Meeting the Standard | Notes |
|---|---|---|-----------------------------------|
| 7.1) The organization has written personnel policies that have been reviewed by an attorney and approved by the governing board within the past 5 years. | Pre-monitoring, p. 6 | | Year of most recent review: _____ |
| 7.2) The organization makes available the employee handbook (or personnel policies in cases without a handbook) to all staff and notifies staff of any changes. | 5) q., p. 16 | | |
| 7.3) The organization has written job descriptions for all positions, which have been updated within the past 5 years. | 4), p. 15 | | Year of most recent update: _____ |
| 7.4) The governing board conducts a performance appraisal of the CEO/executive director within each calendar year. | 3) ee., p. 14 | | |
| 7.5) The governing board reviews and approves CEO/executive director compensation within every calendar year. | 3) ff., p. 14 | | |
| 7.6) The organization has a policy in place for regular written evaluation of employees by their supervisors. | 4), p. 15 | | |
| 7.7) The organization has a whistleblower policy that has been approved by the governing board. | Pre-monitoring, p. 6 | | |
| 7.8) All staff participate in a new employee orientation within 60 days of hire. | 5) r., p. 16 | | |
| 7.9) The organization conducts or makes available staff development/training (including ROMA) on an ongoing basis. | 10) b., p. 23 | | |
| <u>Operations and Accountability – Category 8: Financial Operations and Oversight</u> | Location in Monitoring Tool | Agency is Meeting the Standard | Notes |
| 8.1) The organization's annual audit (or audited financial statements) is completed by a Certified Public Accountant on time in accordance with Title 2 of the Code of Federal Regulations, Uniform Administrative Requirements, Cost Principles, and Audit Requirement (if applicable) and/or State audit threshold requirements. | Contract Compliance Checklist, p. 3 | | |
| 8.2) All findings from the prior year's annual audit have been assessed by the organization and addressed where the governing board has deemed it appropriate. | Contract Compliance Checklist, p. 3 | | |
| 8.3) The organization's auditor presents the audit to the governing board. | 7) k., p. 18 | | |
| 8.4) The governing board formally receives and accepts the audit. | 7) l., p. 18 | | |
| 8.5) The organization has solicited bids for its audit within the past 5 years. | 7) i., p. 18 | | Year of most recent bids: _____ |

CSBG Organizational Standards Assessment

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|---|-------------------------------------|---------------------------------------|-----------------------------------|
| 8.6) The IRS Form 990 is completed annually and made available to the governing board for review. | Pre-monitoring, p. 7 | | |
| 8.7) The governing board receives financial reports at each regular meeting that include the following: <ul style="list-style-type: none"> Organization-wide report on revenue and expenditures that compares budget to actual, categorized by program; and Balance sheet/statement of financial position. | 3) r., p. 12 | | |
| 8.8) All required filings and payments related to payroll withholdings are completed on time. | 7) j., p. 18 | | |
| 8.9) The governing board annually approves an organization-wide budget. | 3) q., p. 12 | | |
| 8.10) The fiscal policies have been reviewed by staff within the past 2 years, updated as necessary, with changes approved by the governing board. | Pre-monitoring, p. 7 | | Year of most recent review: _____ |
| 8.11) A written procurement policy is in place and has been reviewed by the governing board within the past 5 years. | Pre-monitoring, p. 7 | | Year of most recent review: _____ |
| 8.12) The organization documents how it allocates shared costs through an indirect cost rate, or through a written cost allocation plan. | Pre-monitoring, p. 7 | | |
| 8.13) The organization has a written policy in place for record retention and destruction. | 7) e., p. 18 | | |
| <u>Operations and Accountability – Category 9: Data and Analysis</u> | Location in Monitoring Tool | Agency is Meeting the Standard | Notes |
| 9.1) The organization has a system or systems in place to track and report services customers receive. | 10) g., p. 23 | | |
| 9.2) The organization has a system or systems in place to track family, agency, and/or community outcomes. | 10) h., p. 23 | | |
| 9.3) The organization has presented to the governing board for review and action, at least within the 12 months, an analysis of the agency’s outcomes and any operational or strategic program adjustments and improvements identified as necessary. | 10) j., p. 24 | | |
| 9.4) The organization submits its annual CSBG Information Survey data report and it reflects client demographics and organization-wide outcomes. | Contract Compliance Checklist, p. 3 | | |



Program Operations Section
 201 East Washington Avenue, Room A200
 Madison, WI 53708-8916
 Telephone: 608-267-9886
 TTY: 608-267-2200

Governor Scott Walker
 Secretary Eloise Anderson

Division of Family and Economic Security
 Bureau of Working Families

DATE: _____
TO: *Name, Executive Director*
Agency
CC: *Name, Title (Primary CSBG Contact if different from agency Executive Director)*
FROM: **Katie Castern, CSBG Contract Manager**
RE: **Request for Materials for CSBG Monitoring Review**

In preparation for the Community Services Block Grant (CSBG) onsite monitoring review that I have scheduled at your agency for the following dates: _____, I would like to review materials in advance in order to have a focused, efficient onsite review.

Please complete and return the attached **Board Roster Form** by _____ (*This will be a date at least one week away.*) so I may send the Board CSBG Monitoring Survey to the agency's board members.

Please complete and return the attached **CSBG Funded Programs Form** and forward the following materials to me by _____ (*This will be a date at least three weeks away.*):

- Your agency's bylaws, along with date of last review by the board and when they were last reviewed by an attorney, if applicable;
- Schedule of board meetings for the year;
- Conflict of interest policy for board members;
- Board orientation manual or similar materials, if this can be sent electronically;
- Organization chart;
- Personnel policies and procedures manual and the date of last review by an attorney and approval by the board;
- Conflict of interest policy for staff members;
- Succession plan, if available;
- Copies of your agency's general ledger supporting two CORe reports; *I will give the amounts and dates of the CORe reports, which will be from two nonconsecutive months such as February and August of the previous calendar year.*
- Fiscal policies and procedures manual;
- The list of entities with which your agency subcontracts CSBG funds and the amount and purpose of each contract, if applicable;
- Bank reconciliations for _____ (*two nonconsecutive months*), if they can be sent electronically;

ATTACHMENT 3: CSBG Monitoring Tool

- Agency strategic plan, if available;
- The list of other federal programs under which the agency provides services (i.e., Head Start, HUD programs, YouthBuild); and
- List of staff members (including title and role) with CSBG funded positions (any amount) and the percentage of time allocated to CSBG in the past 12 months.

I will also request these things if I need them:

- *Board minutes from the past 12 months if I don't already have them;*
- *Most recent 990 if I can't obtain the 2012 990 from Guidestar.*

Please email these materials to me at katie.castern@wisconsin.gov. **If any of these materials cannot be easily sent electronically, let me know and I will plan time to review them during my onsite visit.**

Please let me know if you have any questions.

Thank you in advance for your cooperation with this process. I look forward to meeting with you and your team in person soon.

Board Member Survey

This survey is part of the Wisconsin Department of Children and Families' (DCF) monitoring process for organizations that receive Community Services Block Grant (CSBG) funds. DCF is required by federal law to monitor each agency once every three years. Please take a few moments to complete this survey.

Your answers will not be made public and will only be used to help identify any technical assistance needs the agency may have. Please contact Katie Castern, CSBG Contract Manager, with any questions at katie.castern@wisconsin.gov or (608)267-8949. Thank you for your time and for your service to your community.

Agency Name _____

Name _____ Date _____

Officer Title (if applicable) _____

1. How long have you been a board member?

- Less than 1 year 5 to 9 years
 1 to 4 years 10 years or longer

2. What sector do you represent on the board? Please check:

- Public
 Low-Income Individuals and Families/Consumers
 Private
 I'm not sure

3. If you represent low-income individuals and families, were you elected by low-income members of the community? Yes No I'm not sure

4. If you represent a public official or specific group or organization do you provide regular reports about the board meetings to the person or group you represent? Yes No This does not apply to me.

5. Please check the following agency documents to which you have access and/or you have reviewed:

- Bylaws
 Board Manual/Board Policies and Procedures
 Personnel Policies and Procedures
 Fiscal Manual
 Strategic Plan

6. How often are board meetings held? _____

7. Who chairs your board meetings? _____

ATTACHMENT 3: CSBG Monitoring Tool

8. Are you a member of any board committees? Yes No

If yes, which committee? _____

How frequently does this committee meet? Monthly Quarterly As needed

Other _____

Are minutes kept for your committee's meetings? Yes No

9. Does the board perform a periodic performance review or evaluation of the executive director?

Yes No

If yes, did you participate in the most recent performance review? Yes No

10. Does the agency have directors' and officers' liability insurance? (This is not a requirement.)

Yes No I don't know

11. Did you have a role in the development and/or review of the agency's most recent community needs assessment? Yes No

If yes, please describe your role: _____

12. Did you review the agency's most recent annual CSBG application? Yes No

Did you have a role in developing the workplan and program goals that are outlined in the CSBG application? Yes No

If yes, please describe your role: _____

13. Have you been informed of the proposed new Organizational Standards for Community Action Agencies? Yes No

14. Does every board meeting include updates on the agency's programs? Yes No

15. Does every board meeting include an update on the agency's financial status? Yes No

16. Have you signed a Conflict of Interest statement within the past 2 years? Yes No

17. Did you receive an orientation within your first six months as a new board member?

Yes No

If yes, from whom? _____

18. Have you participated in the review of the following?

- Cost allocation plan
- Indirect cost proposal (if your agency has one)
- IRS Form 990**
- Annual audit
- Travel policy
- Executive director's contract/compensation package
- Annual agency budget

19. Have you received training to understand financial reports and the audit? Yes No

If yes, who provided the training?

- CFO/finance director
- Executive director
- Finance or audit committee
- Other _____

20. Who is responsible for signing agency checks? _____

21. Who approves the executive director's expenses? _____

22. Are there any legal actions pending against the agency? Yes No I don't know

If yes, please explain: _____

23. Does the board review and approve all substantial agency transactions, such as the agency borrowing money or purchasing property? Yes No I don't know