



California Department of
Community Services & Development



CALIFORNIA 2020-2021 CSBG STATE PLAN AND APPLICATION

Prepared for:

The United States Department of Health and Human Services
Administration for Children and Families
Office of Community Services



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The mission of the Department of Community Services and Development (CSD) is to reduce poverty for all Californians. Through a statewide network of non-profit and public community-based organizations, CSD administers effective and innovative community services and energy programs that aim to help low income families, individuals, and communities throughout the state achieve self-sufficiency and economic security to attain a higher quality of life.

COMMUNITY SERVICES BLOCK GRANT

The Community Services Block Grant (CSBG) is funded under the U.S. Department of Health and Human Services, Administration for Children and Families (ACF), Office of Community Services (OCS). In California, CSBG is “governed by the principle of community self-help, thereby promoting new economic opportunities for Californians living in poverty through well-planned, broadly-based and locally controlled programs of community action.”¹



CSD has been designated by the Governor of California as the lead department for purposes of carrying out California’s CSBG activities and ensuring program compliance, pursuant to the CSBG Act (42 U.S.C. § 9901 et. Seq) and California Government Code (§ 12725 et. Seq.) herein after referred to as “the Act”.

CSBG funding helps low-income Californians achieve economic security through a range of services that address housing, employment, education, income support and management, health and nutrition, emergency services, and more.

These locally determined efforts to alleviate the causes and conditions of poverty are administered by a statewide network of 60 public and non-profit agencies. As a condition of funding, each agency is required to submit a comprehensive local needs assessment as part of the biennial Community Action Plan (CAP).

NUMBERS AT A GLANCE²

Over 1 Million
Services and Outcomes for
Over 750,000
Californians

Vulnerable Populations Served Include:



129,361
Seniors



63,973
People with
disabilities



55,714
People
who lacked
health
insurance



267,510
Children

¹ [California Government Code §12725 et seq](#)

² As reported in the 2018 CSBG Annual Report, data subject to final approval



2020-2021 CALIFORNIA CSBG STATE PLAN

CSD is pleased to submit the CSBG State Plan and Application for FFY 2020 (October 1, 2019 to September 30, 2020) and 2021 (October 1, 2020 to September 30, 2021) to the U.S. Department of Health and Human Services, ACF, OCS.

The CSBG State Plan contains several elements, including:

- Administrative, financial, programmatic assurances, and certifications signed by CSD Director Linné Stout, that designate the department to receive and administer the CSBG funds in California;
- A detailed narrative plan showcasing how CSD plans to carry out the federal assurances in FFY 2020 and 2021;
- Evidence that public and legislative hearing requirements have been met; and
- Results from the 2018 CSBG Annual Report that describe the activities, services, and outcomes conducted by California's CSBG agencies during the 2018 program year.

CSD's CSBG State Plan Goals and Objectives

1. **Foster a culture of collaboration and innovation across state and local entities by focusing on a client centered, whole person approach to help address California's cost crisis through targeted initiatives that may include but are not limited to: Continuum of Care services for homeless individuals and families, disaster preparedness and recovery assistance, nutritious food distribution, California Earned Income Tax Credit (CalEITC) awareness, and free tax preparation services.**
2. **Focus on actionable data to improve outcomes that support the reduction in poverty for vulnerable populations.**
3. **Establish and maintain new training and support programs to sustain excellence through a highly skilled workforce at the State and local level.**



Services and strategies provided by California’s CSBG network of non-profit, local government, Migrant & Seasonal Farmworker (MSFW), and Native American Indian Tribal Agencies (NAI) have resulted in **1,066,335 services and outcomes** for participants and communities with low incomes during 2018.¹ In addition, CSBG Agencies prepared and distributed more than **28 million meals and food parcels** to families and individuals in need.

SUPPORTIVE SERVICES AND OUTCOMES INCLUDE:

50,651 - Employment Services

50,651 employment services which reduced or eliminated barriers to initial or continuous employment, and 17,965 Californians achieved outcomes such as acquired a job, increased their income, or achieved “living wage” employment and benefits.

129,779 - Education and Cognitive Development Initiatives and Support Services

129,779 education and cognitive development services, and 98,639 children, youth, and parents increased skills and knowledge to improve literacy and school readiness, and enriched their home environments.

75,820 - Income and Asset Building Services

75,820 income and asset building services, and 24,812 Californians increased their savings, purchased an asset, raised their credit scores, or improved their financial well-being.

184,797 - Housing Assistance Services

184,797 housing assistance services, and 70,369 low-income individuals received temporary shelter, affordable housing placement, eviction and foreclosure prevention, utility payment assistance, or home weatherization services.



25,850 - Civic Engagement and Community Involvement

25,850 civic engagement and community involvement opportunities, and 28,110 individuals increased their knowledge and leadership skills to improve conditions in their community and their social networks.

201,439 - Health and Social/Behavioral Development Services

28,669,859 - Nutrition Services

201,439 health, social, and behavioral development services, and 28,669,859 nutrition services. 158,104 low-income individuals maintained independent living situations, improved their physical, mental, and behavioral health or received prepared meals and food parcels through various distribution facilities.

¹As reported in the 2018 CSBG Annual Report, data subject to final approval



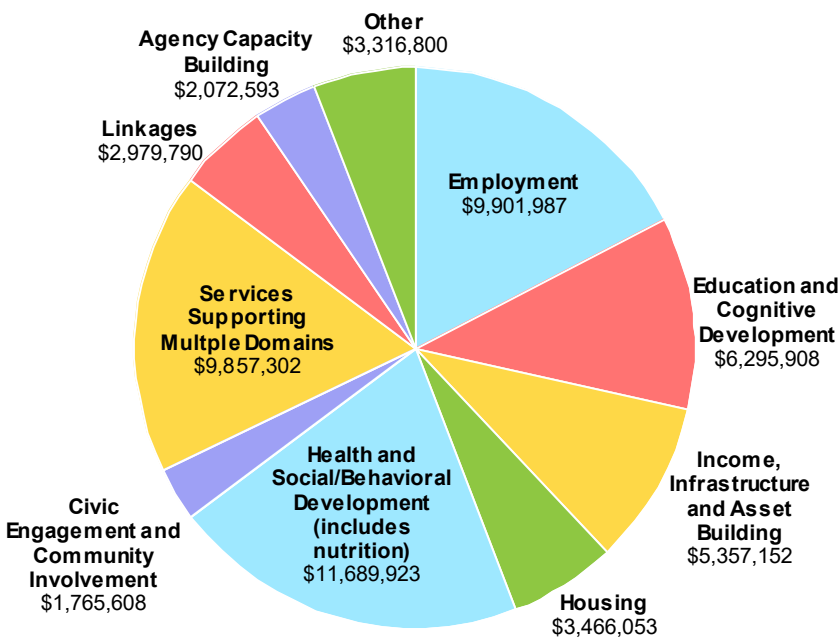
FUNDING OVERVIEW

Distribution of CSBG Funds

CSD will distribute the CSBG grant award received for FFY 2020-2021 based on the following distribution formula:



2018 CSBG Expenditures by Service Category¹:



"Thank God for Amador-Tuolumne Community Action Agency. They have helped me so much. If it wasn't for ATCAA, I would literally be living in the streets right now."

-Helen Goldman, 83 year old widow and temporary resident of the Tuolumne County Shelter

¹As reported in the 2018 CSBG Annual Report, data subject to final approval

DISTRIBUTION OF FUNDING

Overview of Funding

CSBG funds are distributed to 50 states, U.S. territories, NAI tribes, and other organizations. There are currently 35 private non-profit and 25 local governmental organizations for a total of 60 agencies across California (referred to as “CSBG agencies”) receiving CSBG funds. In 2020 and 2021, California’s network of CSBG agencies will continue to develop and administer programs that assist low-income individuals and families to attain the skills, knowledge, and motivation necessary to achieve economic security and self-sufficiency.

CSBG Agency Network Funding: 90 Percent of Funds

**2020 Proposed
Allocation:
\$57,389,212**

At a minimum, 90 percent of California’s CSBG award will be distributed to the network of CSBG agencies that meet both Federal and State requirements [42 U.S.C. 9902(1)(a) and CA Gov. Code § 12730(g)]. The budgeted distribution of funds estimate is based on the 2019 CSBG allocation.

Planned CSBG 90 Percent Funds – Per Year

CSBG Agency	Funding Amount	Type of CSBG Agency	Counties Served
Berkeley Community Action Agency	\$266,863	Public	Alameda
City of Oakland, Department of Human Services	\$1,354,323	Public	Alameda
Inyo Mono Advocates for Community Action, Inc.	\$260,149	Nonprofit	Alpine, Mariposa, Tuolumne, Inyo Mono
Amador-Tuolumne Community Action Agency	\$261,283	Public	Amador, Tuolumne
Community Action Agency of Butte County, Inc.	\$361,292	Nonprofit	Butte
Calaveras-Mariposa Community Action Agency	\$260,612	Public	Calaveras, Mariposa

CSBG Agency	Funding Amount	Type of CSBG Agency	Counties Served
Contra Costa County Employment & Human Services Department / Community Services Bureau	\$850,578	Public	Contra Costa
Del Norte Senior Center, Inc.	\$51,176	Nonprofit	Del Norte
El Dorado County Health and Human Services Agency	\$285,947	Public	El Dorado
Fresno County Economic Opportunities Commission	\$1,854,644	Nonprofit	Fresno
Glenn County Health and Human Services Agency	\$262,075	Public	Glenn, Colusa, Trinity
Redwood Community Action Agency	\$269,186	Nonprofit	Humboldt
Campesinos Unidos, Inc.	\$313,349	Nonprofit	Imperial
Community Action Partnership of Kern	\$1,489,531	Nonprofit	Kern
Kings Community Action Organization, Inc.	\$301,174	Nonprofit	Kings
North Coast Opportunities, Inc.	\$546,506	Nonprofit	Lake, Mendocino
Plumas County Community Development	\$260,279	Public	Lassen, Plumas, Sierra
Foothill Unity Center, Inc.	\$322,321	Nonprofit	Los Angeles
Long Beach Community Action Partnership	\$787,087	Nonprofit	Los Angeles
County of Los Angeles Department of Public Social Services	\$6,072,078	Public	Los Angeles
City of Los Angeles, Housing and Community Investment Department	\$6,576,134	Public	Los Angeles
Community Action Partnership of Madera County, Inc.	\$279,073	Nonprofit	Madera
Community Action Marin	\$269,695	Nonprofit	Marin
Merced County Community Action Agency	\$499,402	Nonprofit	Merced
Modoc Siskiyou Community Action Agency	\$262,075	Public	Modoc, Siskiyou

CSBG Agency	Funding Amount	Type of CSBG Agency	Counties Served
Monterey County Community Action Partnership	\$500,384	Public	Monterey
Community Action of Napa Valley	\$286,986	Nonprofit	Napa
Nevada County Department of Housing and Community Services	\$271,287	Public	Nevada
Community Action Partnership of Orange County	\$2,733,254	Nonprofit	Orange
Project GO, Inc.	\$334,328	Nonprofit	Placer
Community Action Partnership of Riverside County	\$2,600,540	Public	Riverside
Sacramento Employment and Training Agency	\$1,767,288	Public	Sacramento
San Benito County Health and Human Services Agency, Community Services and Workforce Development	\$267,930	Public	San Benito
Community Action Partnership of San Bernardino County	\$2,692,859	Nonprofit	San Bernardino
County of San Diego, Health and Human Services Agency, Community Action Partnership	\$3,335,519	Public	San Diego
Urban Services, YMCA, San Francisco	\$855,136	Nonprofit	San Francisco
San Joaquin County Department of Aging and Community Services	\$975,038	Public	San Joaquin
Community Action Partnership of San Luis Obispo County, Inc.	\$297,524	Nonprofit	San Luis Obispo
San Mateo County Human Services Agency	\$453,450	Public	San Mateo
Community Action Commission of Santa Barbara County	\$529,942	Nonprofit	Santa Barbara
Sacred Heart Community Service	\$1,415,828	Nonprofit	Santa Clara
Community Action Board of Santa Cruz County, Inc.	\$290,213	Nonprofit	Santa Cruz

CSBG Agency	Funding Amount	Type of CSBG Agency	Counties Served
Shasta County Community Action Agency	\$299,498	Public	Shasta
Community Action Partnership of Solano, JPA	\$384,710	Public	Solano
Community Action Partnership of Sonoma County	\$448,690	Nonprofit	Sonoma
Central Valley Opportunity Center, Incorporated	\$1,339,880	Nonprofit MSFW	Mariposa, Tuolumne, Stanislaus, Madera, Merced
Sutter County Community Action Agency	\$269,159	Nonprofit	Sutter
Tehama County Community Action Agency	\$285,566	Public	Tehama
Community Services & Employment Training, Inc.	\$898,711	Nonprofit	Tulare
Community Action of Ventura County, Inc.	\$682,002	Nonprofit	Ventura
County of Yolo, Department of Employment and Social Services	\$294,566	Public	Yolo
Yuba County Community Services Commission	\$272,539	Public	Yuba
California Human Development Corporation	\$1,466,613	Nonprofit MSFW	Alpine, Amador, Butte, Calaveras, Colusa, Contra Costa, Del Norte, El Dorado, Glenn, Humboldt, Lake, Lassen, Marin, Mendocino, Modoc, Napa, Nevada, Placer, Plumas, Sacramento,

CSBG Agency	Funding Amount	Type of CSBG Agency	Counties Served
			San Joaquin, Shasta, Sierra, Siskiyou, Solano, Sonoma, Sutter, Tehama, Trinity, Yolo, Yuba
Center for Employment Training	\$1,976,739	Nonprofit MSFW	Alameda, Imperial, Inyo, Los Angeles, Mono, Monterey, Orange, Riverside, San Benito, San Bernardino, San Diego, San Francisco, Santa Barbara, San Luis Obispo, San Mateo, Santa Clara, Santa Cruz, Ventura
Proteus, Inc.	\$2,359,335	Nonprofit MSFW	Fresno, Kern, Kings, Tulare
Karuk Tribe of California	\$121,497	NAI	Siskiyou, Humboldt
Northern California Indian Development Council, Inc.	\$2,080,897	Nonprofit NAI	Statewide
County of Los Angeles Workforce Development, Aging & Community Services	\$284,472	Public NAI	Los Angeles
Total	\$57,389,212.00		

Discretionary Funding: Five Percent of Funds

**2020 Proposed
Allocation:
\$3,188,289**

In accordance with Section 675C(b) of the Act [42 U.S.C. § 9907(b)], excluding administration, and in accordance with California Government Code § 12786, CSD will use five percent of its annual CSBG funding for discretionary purposes. If the CSBG allocation is reduced, CSD will backfill up to 3.5 percent using the discretionary dollars to keep CSBG agencies funded at their previous year allocation amount. If necessary, CSD will adjust its planned activities which may include reducing the amount allocated to disaster relief or innovative projects.

CSD will continue to seek input from the CSBG agency network regarding the use of discretionary funds. CSD may initiate a competitive grant process to make discretionary funds available to support targeted initiatives.

Use of Remainder/Discretionary Funds – Per Year

[See 675C(b)(1) of the CSBG Act]

Remainder/Discretionary Fund Uses	Planned %	Brief Description of Services and/or Activities
Training and Technical Assistance (T&TA) to CSBG Agency Network	20%	Annual support for Member Associations: California Community Action Partnership Association (CalCAPA), and La Cooperativa Campesina de California. Annual support for California Community Economic Development Association (CCEDA).
Innovative programs/activities by eligible entities or other neighborhood groups	52%	CSD may elect to distribute the discretionary funds equally or through a competitive process to CSBG agencies to enhance and/or expand new or existing programs or to increase agency capacity. Other options may include making funds available for specific targeted initiatives.

Remainder/Discretionary Fund Uses	Planned %	Brief Description of Services and/or Activities
Other activities	28%	<p>Annual support for Limited Purpose Agencies (LPAs) as defined in subdivision (a) of Government Code § 12775 as community-based nonprofit organizations.</p> <p>Annual support for SupplyBank.org to provide unmet material essentials for low-income individuals and families.</p> <p>Funds may be used for Administrative automation tools.</p> <p>In a State of Emergency, CSD may make available all or a portion of disaster funding to CSBG agencies in affected counties.</p> <p>Potential reductions to CSBG funding may also be backfilled with discretionary funds.</p>
Totals	100%	

Activities that are funded under the discretionary funds include:

Annual Support for Member Associations

California Community Action Partnership Association

CalCAPA is the recognized State member association and lead agency administering the ACF, Region IX Regional Performance & Innovation Consortia (RPIC). The RPIC serves as a comprehensive T&TA system to provide services to California’s agencies. CSD will partner with CalCAPA and RPIC to ensure that agencies in California meet operational and organizational needs. Through ongoing collaboration, CSD and CalCAPA will increase agencies’ capacity, and identify exemplary practices in the CSBG network.

La Cooperativa Campesina de California

La Cooperativa Campesina de California is the lead agency conducting training CSBG agencies specific to serving MSFWs. Discretionary funding allocated to La Cooperativa supports La Voz del Campo Bulletin and Radio Bilingue broadcasts to provide farmworkers and their families with information on farmworker issues, programs, and services. Discretionary funding also supports SupplyBank.org, an innovative, dignified approach to address unmet material needs of lowincome families and individuals using a food bank distribution model. Through the partnership with La Cooperativa, CSD is able to identify the needs of MSFW and provide adequate services specific to the needs of the farmworker population.

Annual Support for Training and Technical Assistance

T&TA is provided to CSBG agencies in partnership with CalCAPA. Training needs are identified through on-site monitoring, desk reviews, review of Organizational Standards, and communication with the agencies.

CSD reviews training requests received on an ongoing basis. Depending upon the training need, CSD staff will either conduct the training or refer the agency to CalCAPA. CalCAPA delivers T&TA to agencies in a broad range of topical areas, including but not limited to; deficiencies arising out of monitoring, capacity building needs, board management, strategic planning, Results Oriented Management and Accountability (ROMA) and other elements.

In partnership with CalCAPA, CSD hosts quarterly CSBG Advisory Committee (CAC) meetings. The CAC meeting is an opportunity to update agencies on CSBG related topics and issues, and to share experiences and innovations.

CSD also partners with CCEDA, an organization that has expertise in community economic development. CCEDA provides T&TA to CSBG agencies to achieve results through a full range of economic and community development strategies.

Competitive Grants

CSD may administer a competitive grant process to make discretionary funds available to California's network of CSBG agencies to support targeted community initiatives, to add a new component to an existing program in selected categories, or to identify other funding needs for agencies. Funds will not be awarded to entities who intend to appropriate additional funds to an existing program without the intent to expand services.

Annual support for Limited Purpose Agencies

LPAs may receive discretionary funds to provide services with specific focus on training, technical assistance, special support programs, or other activities servicing eligible beneficiaries. Of the 60 CSBG agencies, there are currently two LPAs, the Community Design Center (CDC) and Rural Community Assistance Corporation (RCAC).

Disaster Relief Funding

If a State of Emergency is declared by the California Governor's Office, or at the CSD Director's discretion, CSD may make available all or a portion of the discretionary funding set-aside for disaster relief to CSBG agencies in the counties and areas affected. Typically, the amount reserved for disaster relief is \$250,000 per year, subject to the availability of funds.

State Use of Administration Funding: Five Percent of funds

**2020 Proposed
Allocation:
\$3,188,289**

State Staff Positions/Full-Time Equivalents

CSBG funds 80.9 State staff positions in whole or in part (24.7 State full time equivalents) under this State Plan.

State Training and Technical Assistance

In addition to the T&TA provided by CalCAPA, CSD provides ongoing technical support to the network of CSBG agencies to improve fiscal and programmatic accountability and program administration. Categories of T&TA provided by CSD and CalCAPA are described below.

Training and Technical Assistance	
Training, Technical Assistance, or Both	Topic
Both	Fiscal
Both	Governance/Tripartite Boards
Technical Assistance	Organizational Standards – General
Technical Assistance	Organizational Standards – for CSBG eligible entities with unmet Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs)
Technical Assistance	Reporting
Both	ROMA
Both	Strategic Planning
Technical Assistance	Monitoring
Both	Community Economic Development
Both	New Executive Director & Employee Onboarding

STATE COORDINATION AND RESPONSIBILITIES

To meet assurance 676(b)(5) of “the Act”, CSD recognizes the importance of developing strategic partnerships between the State of California and the network of CSBG agencies at the local level.

Communication

Communication Plan

CSD will use various methods of communication to keep the network of CSBG agencies, CalCAPA, and other State partners up-to-date and actively engaged. Formats used to inform the network include postings on CSD’s public and provider websites, public notices, blog posts, emails, phone calls, presentations during the quarterly CSBG Advisory Council (CSBG-AC) and CAC meetings, and webinars. These communication methods will be used to provide information regarding CSBG legislative and programmatic updates, funding opportunities, and feedback regarding performance, best practices, and service delivery.

Linkages at the State Level

To support State efforts to reduce poverty, CSD administers the Low-Income Home Energy Assistance Program (LIHEAP) and Weatherization Assistance Program (WAP) and participates in State interagency workgroups that focus on key anti-poverty initiatives.

Low-Income Home Energy Assistance Program and Weatherization Assistance Program

CSD leads and administers key energy efficiency and weatherization programs for low-income Californians. CSD provides administrative support for the LIHEAP and the WAP by serving as the lead State administrator for LIHEAP and WAP services and service areas. LIHEAP and WAP services include utility bill assistance, emergency assistance with home heating and cooling repairs, home energy shut-off emergency assistance, weather stripping, caulking, energy-efficient lighting, and thermostat repair/replacement. Approximately 50 percent of CSBG agencies manage both the LIHEAP and CSBG program.

State Interagency Team

CSD actively participates in the State Interagency Team (SIT). The SIT provides leadership and guidance to facilitate the implementation of programs benefitting children, youth, and families in California. The SIT brings together various agencies with aligned missions and goals to build a network of shared responsibility and accountability for improving the welfare of children, youth and families. The team ensures the planning, funding and policy are coordinated among State departments to maximize the impact. CSD will continue to engage and participate on the SIT to further develop and support existing programs.

CSD also participates in sub-workgroups of the SIT including the:

- Critical Incident Workgroup - Focused on preventing child fatalities and near fatalities that are the result of abuse and neglect by sharing strategies, information and data that impacts the common population of children and families;
- California Home Visiting Program - Focused on improving the quality, efficiency, and effectiveness of home visiting through interagency collaboration through improved service delivery and coordination;
- Workgroup to Eliminate Disparities & Disproportionality - Focused on developing recommendations for addressing disparity and disproportionality as it impacts service delivery to economically or racially disadvantaged individuals/communities; and
- Homelessness Matters Workgroup - Focused on promoting awareness about the plight of homeless students in California.

CSD also participates in the California Department of Social Services (CDSS) Food Access Nutrition Education and Outreach Participation Committee meetings comprised of Federal, State, County, non-profit, advocates, and others focused on providing and coordinating the Supplemental Nutrition Assistance Program (SNAP) and SNAP Education (SNAP-Ed) program for low-income Californians.

California Health in All Policies Task Force

CSD continues to participate in the California Health in All Policies (HiAP) Task Force, led by the California Department of Public Health. HiAP is a collaborative approach to integrate and articulate health considerations into policymaking across sectors to improve the health of all Californians. HiAP brings together State agencies, departments, and offices to make recommendations that focus on achieving health equity to increase the length of people's lives and ensure that their lives are healthy and productive.

Government Alliance on Race and Equity

The Government Alliance on Race and Equity (GARE) is a national network of governments working to achieve racial equity and advance opportunities for all. In 2018, CSD employees joined together to represent the department in the GARE Capitol Cohort. As part of the inaugural call of 19 State departments, CSD staff participated in a year-long series of trainings with the goal of creating a Racial Equity Action Plan.

CSD plans to use the “Racial Equity Action Plan” to inform internal and external processes and practices as a department.

Linkages at the Local Level

To support local efforts to reduce poverty, CSD continues to lead the SIT Reducing Poverty Workgroup and the CSBG-AC to foster communication and collaboration between California State departments and local agencies.

State Interagency Team Reducing Poverty Workgroup

The Reducing Poverty Workgroup was formed as a subgroup of the SIT and is comprised of participants from State and Federal agencies, and local private non-profit organizations. The goal of the SIT Reducing Poverty Workgroup is to reduce poverty in California by increasing the number of Federal and State Earned Income Tax Credits (EITCs) claimed by eligible low-income populations and to increase awareness and outreach for the California EITC (CalEITC) program. CSD will continue to lead the workgroup and recruit new partners, agencies, and departments to participate.

California Earned Income Tax Credit

The EITC is widely recognized as one of the nation’s most powerful resources for lifting low-income people out of poverty. In 2015, California established the CalEITC, extending a new cashback credit to the poorest working families in the State. To further reach eligible Californians and ensure that they file their taxes and claim the EITC, the Franchise Tax Board (FTB) and CSD developed a strategic partnership to support education and outreach activities for the CalEITC. Through the efforts of the SIT Reducing Poverty Workgroup, FTB elected to partner with CSD to make grant funds available for community-based outreach efforts.

Since 2016, CSD has awarded and administered over \$19 million in grant awards to nonprofit and local government agencies to increase CalEITC education and outreach. Grants awarded targeted counties across the State with the highest rate of potential tax filers. Grants were also awarded to address the needs of rural communities, and others statewide.

In 2018, the Budget Act appropriated \$10 million to FTB to increase awareness of CalEITC and to provide free tax preparation assistance. Of the amount appropriated, \$5 million was designated for CalEITC education and outreach activities, and nearly \$5 million was designated to support free tax preparation assistance. CSD collaborated with the FTB to award and administer the grant funds. Also, in 2018, the CalEITC eligibility guidelines were expanded to include tax filers between 18-25 and over 65 years old. The age expansion required the Reducing Poverty Workgroup to strategically develop outreach and education strategies to target newly eligible populations. For the 2018 tax year, 1,917,562 CalEITC tax credits were issued, totaling over \$353 million with an average credit of \$184¹.

Now in 2019, California expanded CalEITC to further assist families facing the State's cost crisis. The Fiscal Year (FY) 2019-2020 California State Budget Act more than doubles the investment in CalEITC to \$1 billion, which will increase the number of participating households from two million to three million. The expansion of CalEITC, when combined with the Federal EITC, increases the potential value of tax credits available for low-income families to over \$6,000. The Budget Act also expanded the credit to help low-income families with young children through a new \$1,000 credit for families with children under the age of six, and increased income eligibility to \$30,000 to include full-time workers making the 2022 minimum wage of \$15 an hour.

The 2019-2020 Budget Act has once again appropriated \$10 million to FTB to increase awareness of CalEITC and free tax preparation assistance for the 2019 tax season. CSD will continue to collaborate with FTB to make \$5 million in grant funds available to community-based or non-profit organizations for CalEITC education and outreach activities, and \$5 million to support organizations that provide free tax preparation assistance.

CSBG Advisory Council

CSD facilitates the CSBG-AC, formerly the CSBG Working Group (CWG), which is a group comprised of CalCAPA and select CSBG agencies. The CSBG-AC meets quarterly and provides the participants a forum to make recommendations to CSD regarding potential policy changes and engage in peer-to-peer networking with other agencies.

¹ FTB CalEITC Total Statistics as of June 9, 2019.

CSBG AGENCIES' PROGRAMMATIC ASSURANCES AND NARRATIVE

As the lead agency designated to administer CSBG in California, CSD provides the following narrative detailing how the State will meet each CSBG assurance as defined by section 676(b) of "the Act":

Use of Funds Supporting Local Activities

CSBG Services

676(b)(1)(A) *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 (42 U.S.C. 601 et seq.), 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;*

A minimum of 90 percent California CSBG funds are distributed to CSBG agencies to provide services at the local level. A community needs assessment is submitted by CSBG agencies on a biennial basis as part of the CAP, which will describe the most vital needs of the communities in which they serve. The CAP will also highlight community partner coordination efforts, the identification of roles within service areas, and how each agency will work with local stakeholders to meet the Federal assurances. This assessment provides descriptions of service delivery systems and programs to address community needs which may include: homeless services and transitional housing, disaster preparedness and recovery, nutritious food distribution, health education and access, behavioral health services, employment skills training and career development, financial literacy programs, free tax preparation assistance, language and educational supports, mentoring, parenting development, childcare services, and other activities.

CSD will evaluate the submitted responses and annual outcome projections to ensure programmatic activities are on target to achieve these assurances and that the coordination and established linkages between governmental and social services programs are effective in addressing the needs of low-income Californians. Examples of coordination and linkages include partnerships with local Workforce Investment Boards, Homeless Continuum of Care coalitions, disaster recovery resource centers, social service departments, centralized one-stop service centers, community health and childcare centers, faith-based organizations, educational institutions, and other community-based organizations that focus on the diverse needs of low-income families and individuals throughout the State.

Needs of Youth

676(b)(1)(B) *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;*

CSBG agencies meet the identified needs of youth in their communities as described in the CAP through several methods that include but are not limited to: homeless youth assistance, gang suppression and prevention, substance abuse and teen pregnancy prevention initiatives, behavioral health services for children and transition age youth, recreation and education focused programs, summer youth programs, youth civic engagement initiatives, life skills and financial literacy training, employment skills training, entrepreneurship programs, mentoring, tutoring, and free book distribution programs.

Coordination of Other Programs

676(b)(1)(C) *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)*

CSD requires CSBG agencies to describe the systems used to ensure coordination with other community partner programs in the CAP by identifying roles within service areas and highlighting how each entity will work with local stakeholders to certify compliance with this assurance.

State Use of Discretionary Funds

676(b)(2) *The description of “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.*

[See section: “Discretionary Funding: 5% of Funds”.](#)

Eligible Entity Service Delivery System

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;*

While CSBG agencies adopt service delivery systems that seek to maximize client access, avoid duplication of services, and provide a variety of needs, each agency operates according to their own diverse community conditions and priorities. Some agencies rely on providing services at a centralized location while others, particularly those in rural and remote regions of the State, provide mobile services or make use of satellite offices. Agencies may also rely on trusted community partners to subcontract services aligned with CSBG mission and goals.

Some services provided by CSBG agencies and/or partners include: housing and emergency services, employment services, food assistance programs, immigration services, tax preparation assistance, child development services, and utility assistance programs. Agencies and partners incorporate intake and eligibility processes to assess and track client demographic information. By implementing an intake process, CSBG agencies can assess priorities and develop strategies to reach low-income individuals and families. CSD requires CSBG agencies to certify compliance with this assurance in the CAP.

Eligible Entity Linkages – Approach to Filling Service Gaps

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

CSBG agencies collaborate with trusted local community organizations, service providers, and public and private organizations to ensure effective delivery of services to low-income Californians. Agencies establish contractual relationships and informal

agreements with trusted subcontractors and community partners to enhance the services they provide.

Community needs assessment data is used by CSBG agencies to identify opportunities to resolve gaps in services, thereby enhancing current programs. Cross-referrals to clients is common practice, as agencies share information about respective services through participation in local area commissions.

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

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

The CAP requires descriptive language to identify how each CSBG agency will coordinate public and private resources to effectively mobilize and leverage CSBG funds. To maximize delivery of services, agencies coordinate with a network of public and private sector partners including, but not limited to: Workforce Investments Boards, Homeless Service Provider coalitions, disaster recovery resource centers, social service departments, centralized one-stop service centers, CalWORKs, CalFresh, transitional housing programs, healthcare providers, senior centers, community advisory boards, youth councils and emergency services providers. By establishing these partnerships, agencies can more effectively address the diverse needs of low-income individuals and families in California by using direct referrals, joint case management, shared use of space to deliver services, and subcontractor agreements.

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

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).

The network of agencies use CSBG funding to support innovative community-based initiatives that encourage parental responsibility including: fatherhood strengthening classes, parent and child joint counseling, co-parenting communication skills training,

programs to address health disparities, parental engagement groups, therapy, and other strategies to encourage active involvement in the lives of children to prevent child abandonment.

CSBG agencies also focus on programs that assist incarcerated or recently paroled men, providing job training and employment assistance to empower them to provide financial support for their children, and re-establish healthy connections to their families. Many agencies partner with Women and Infant Children, Child Support Services Department, CDSS, Head Start, First 5, and many other State programs to connect clients with additional resources and services.

Eligible Entity Emergency Food and Nutrition Services

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.”*

CSBG agencies work to offset conditions of starvation and malnutrition by providing emergency food assistance and nutritional services by allocating funds to community food banks. In addition, some CSBG agencies operate emergency food services in-house to address the food security of their clients, including: coordinating summer lunch programs, supporting clients with CalFresh applications, and providing emergency food vouchers or gift cards.

CSBG funding in conjunction with public and private resources is used by many agencies to operate nutrition-related programs that promote the availability of nutritious foods, including outreach programs (FreshText), food banks, and development of community gardens. CSBG agencies are required to describe emergency food and nutrition services in their CAP.

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

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.”*

CSD requires CSBG agencies to establish linkages between governmental and social services programs that are effective in addressing the needs of low-income Californians. Examples of coordination and linkages include: partnerships with local Workforce Investment Boards, CalWORKS, Welfare to Work programs, CalFresh, Veteran's services, Association of Farmworker Opportunity Programs, social service departments, centralized service centers, community health and childcare centers, faith-based organizations, educational institutions, and other community-based organizations.

CSBG agencies and community partners coordinate diverse employment training programs that target low-income individuals including youth, migrant, seasonal, and displaced agriculture workers, and other low-income individuals. These programs include but are not limited to language courses, high school diploma or general education diploma completion, computer skills training, interview skills workshops, life skills and financial literacy training, and job placement programs that focus on preparing low-income individuals to enter or reenter the workforce.

State Coordination/Linkages and Low-income Home Energy Assistance

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.”*

CSD ensures that antipoverty programs throughout the State effectively coordinate in each community, including coordination with the Federal LIHEAP. CSD administers the LIHEAP and the WAP, which provides weatherization services and energy crisis intervention for low-income Californians. CSBG agencies provide energy outreach, education, utility assistance, heating, ventilation, and air conditioning repair and replacement, energy-efficient appliance repair and replacement, California Alternative Rates for Energy application assistance and enrollment, and overall Energy Savings Assistance Program services.

Approximately 50 percent of the CSBG agencies administer both the CSBG and LIHEAP grants. The remaining CSBG agencies work in collaboration with the local LIHEAP provider and utilize the linkage to serve the low-income individuals and families in their community through direct referrals.

Federal Investigations

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

[See section: “Audits”.](#)

Funding Reduction or Termination

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).”*

CSD assures that “any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b).”

CSD requires each CSBG agency to describe contingency plans for potential funding reductions as part of the CAP. In the event that there is a reduction in the CSBG allocation, CSD will backfill up to 3.5 percent using the discretionary dollars to keep CSBG agencies funded at their previous year’s allocation amount. If necessary, CSD will make adjustments to its planned activities, which may include reducing the amount allocated to disaster or innovative projects.

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

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.”*

CSD will assure that CSBG agencies coordinate programs and develop partnerships with local community organizations that serve low-income families and individuals including faith-based and charitable organizations through program performance monitoring, review of annual programmatic reports, and responses submitted in the CAP.

Eligible Entity Tripartite Board Representation

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.”*

CSD monitors each CSBG agency tripartite board through the analysis of the board roster, bylaws, and approved board meeting minutes. CSBG agencies are required to describe their procedures for ensuring low-income representation on their board as part of the CAP. CSD reviews the written procedures describing how each agency’s board will comply with the Federal assurance mandating tripartite board composition. CSD ensures that CSBG agencies institute a democratic selection process for low-income board members and requires CSBG agencies to describe the recruitment and selection process. Several agencies have implemented several outreach strategies to ensure the participation of low-income community residents, including public forums, social media, newspapers, and community canvassing.

Eligible Entity Community Action Plans and Community Needs Assessments

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.”*

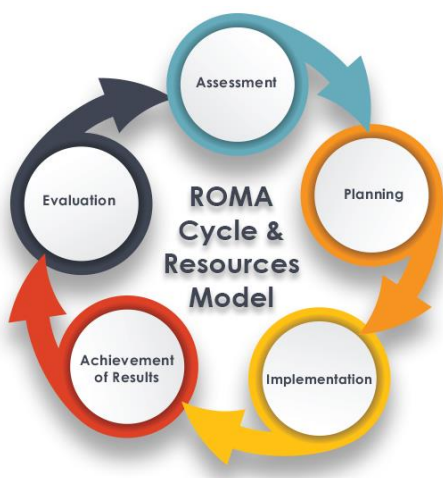
CSD requires each agency to submit a CAP in order to receive CSBG funding no later than June 30th on a biennial basis. The CAP includes a community needs assessment for their service area describing the immediate issues impacting the community. CSBG agencies provide a detailed description of the data collection methods used to inform the delivery of services. CSBG agencies use several methods to collect quantitative and qualitative data, including: community forums, public comments, online and in-person surveys, interviews, and surveying community partners. In addition, some CSBG agencies have developed surveys in multiple languages to reach specific populations. As a result, CSBG agencies have identified issues, such as: affordable housing, employment, public safety, childcare, and health access as main concerns impacting local communities. Based on the needs assessment, CSBG agencies develop strategic plans to provide support services according to local needs.

CSD reviews all needs assessments and CAP responses to ensure the conditions of poverty and barriers to economic security are appropriately captured for each agency's service area. CSD Staff reviews the data to confirm that data is dependable and verifiable.

State and Eligible Entity Performance Measurement: ROMA or Alternate system

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.”*

The State of California and the network of CSBG agencies participate in ROMA. CSD assures agencies will meet the ROMA Cycle principles by assessing community needs through the completion of a comprehensive needs assessment, planning and implementing activities and services based on their needs assessment, collecting and tracking outcome data, and evaluating performance results.



Validation of the ROMA Cycle is completed by CSD through review and analysis of the community needs assessment as part of the biennial CAP, annual programmatic reporting, on-site monitoring visits, and organizational standards assessments. The data derived from the community needs assessment will inform the goal-setting process and assist in formulating programmatic activities. CSBG agencies will be required to provide data-driven examples of improvements made to service delivery and performance, as well as highlight how these improvements impact low-income individuals and families within their communities.

Validation for CSBG Eligible Entity Programmatic Narrative Sections

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

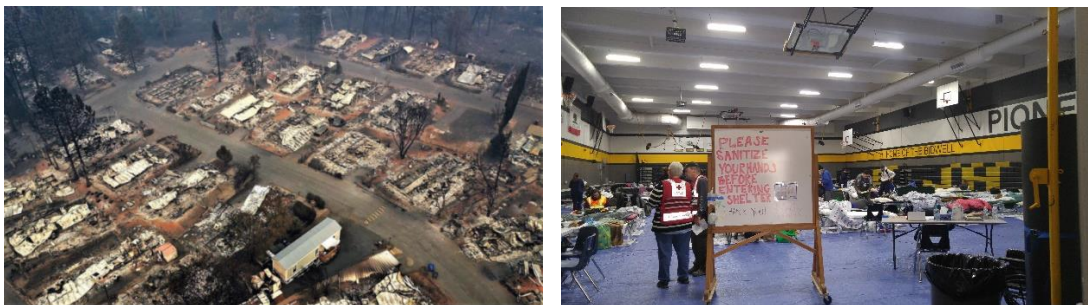
The State provides information on carrying out each of the assurances within this document and in corresponding items throughout the CSBG State Plan.

PROGRAM HIGHLIGHTS

Community Action Agency of Butte County, Inc.

(Camp Fire Disaster response efforts)

“The spirit of Community Action can be that needed inspiration when tragedy strikes and when it seems that no end is in sight.” – Tom Tenorio, CEO of the Community Action Agency of Butte County.



On November 8, 2018, the Camp Fire became the most destructive wildfire in California state history. Approximately 93 percent of the town of Paradise and much of the surrounding community was destroyed. Worst of all, 85 residents tragically lost their lives to the fire. While many staff members of the Community Action Agency of Butte County, Inc. (Butte County CAA), the local Community Services Block Grant Agency for Paradise, lost their homes in the Camp Fire, they still reported to work every day to help their community recover from the aftermath of the fire, a recovery effort that continues to this day.

Within hours of the fire, Butte County CAA leaped into action. In partnership with CSD, Butte County CAA used CSBG discretionary funding and LIHEAP emergency energy crisis intervention funds to help survivors of the fire with shelter, gift-cards to pay for critical expenses, and direct payment to lodging vendors for displaced families. Butte County CAA 's North State Food Bank also immediately provided nutritious food and supplies to evacuation centers and impromptu shelters that popped up due to the sheer magnitude of people fleeing the fire. After soliciting new and regular food donors for additional donations, an outpouring of support came quickly, and a new partnership was established with the Grassroots Alliance, a private non-profit experienced in providing support to communities met by disaster. This partnership brought generous corporate donations to help support the growing need for assistance.

Two weeks after the fire, Butte County CAA established a weekly Tailgate Food Giveaway, targeting locals affected by the fire. Within the first several months after the disaster, over 700,000 pounds of food were delivered to those in need.

CSBG funding uniquely equips CAA's to quickly provide services tailored to the needs of their communities in the immediate wake of a disaster like the Camp Fire. Butte

County CAA now focuses on support and assistance for those impacted by the Camp Fire through comprehensive case management to help people to develop and execute a plan for the road ahead. With help from the local Butte County CAA team, the supportive staff at CSD, and an outpouring of community support, Butte County and the Town of Paradise continue to witness the true commitment of people living the Promise of Community Action.

Community Action Partnership of San Luis Obispo County, Inc.

(40 Prado Homeless Services Center)



The 40 Prado Homeless Services Center opened its doors in San Luis Obispo County on September 17, 2018 to provide a cost-effective and central location for homeless families and individuals as they embark on the path to self-sufficiency. In partnership with the compassionate community of San Luis Obispo County, the Community Action Partnership of San Luis Obispo County, Inc. (CAPSLO) spearheaded planning and construction to bring 40 Prado to life.

40 Prado is a 24-hour, year-round facility that provides personal care and shelter for 100 clients, including an average of ten children a night, and serves 84,000 meals per year. As part of the County's Continuum of Care, CAPSLO and 40 Prado effectively assist the homeless by providing customized services that include: counseling, case management, on-site primary healthcare, veterans' services, and much more. Built to improve the health and stability of its participants, 40 Prado aims to provide families and individuals with a means to an end.

To meet the needs of homeless individuals who come to 40 Prado with mental health issues, CAPSLO has begun collaborating with Transitions Mental Health Association (TMHA) on a program that provides mobile mental health services for clients classified as "Moderate to Severe." TMHA's Homeless Outreach Team works with 40 Prado staff to reach the most challenging of clients, utilizing mobile tele-psychiatry services to identify those who suffer from dual diagnoses, such as mental health illnesses in conjunction with substance abuse disorders, and prescribe necessary medications.

Since December 2018, 12 children and one pregnant mom have been served through the Early Head Start Program located at 40 Prado, and two children and their families have been provided regular opportunities to promote positive parent-child relationships

and high-quality early learning experiences while staying at the center, through the Head Start Home Base Program. Out of this program, two families have been placed in housing to date.

Sacramento Employment and Training Agency

(Black Child Legacy Campaign)

In 2009, County Supervisor Phil Serna appointed a commission to analyze the disproportionate death rate among African American children in Sacramento County compared to other racial groups. The Steering Committee on Reduction of African American Child Deaths identified four factors, including: perinatal conditions, infant sleep-related deaths, child abuse or neglect, and/or third-party homicides. In addition, poverty, limited access to education, and stress also contribute to the high number of African American child deaths in Sacramento County. To address and improve the African American child death rate, the CSBG funded, the Sacramento Employment and Training Agency (SETA) joined a coalition along with the Sierra Health foundation, Mutual Assistance Network, Liberty Towers, Sacramento County Department of Human Assistance, the Greater Sacramento Urban League, and South Sacramento Christian Center.

The Black Child Legacy Campaign is community-driven movement that seeks a 20 percent reduction in deaths of African American children by 2020 in Sacramento County. In addition to serving on the Steering Committee, SETA serves as a first responder for seven neighborhoods in Sacramento County as part of Multi-Disciplinary Teams (MDT's). MDT's are designed to respond to the immediate needs of families in crisis, including facilitating communication between families and first responders and de-escalating potential violence. MDT's provide culturally relevant resources that address the immediate needs of Sacramento communities. As trusted community partners, MDT's connect families and individuals to a network of resources and programs that include: healthcare services, food and housing assistance, youth and teen programs, counseling, and parenting support groups.

SETA has four dedicated staff members who serve on MDT's to offer resources and support in workforce development and other CSBG programs. Since the Black Child Legacy Campaign was initiated in Sacramento County, the child death rate has been reduced by 15 percent. The program's success is the result of community action and the collaboration among several public and private agencies to the Black Child Legacy Campaign, including SETA.

Community Action Partnership of Kern

(CalEITC Education and Outreach)



The EITC is a widely recognized resource for lifting low-income individuals and families out of poverty. As trusted messengers, CSBG agencies serve as key community partners to support California EITC education and outreach efforts. In 2018, the Community Action Partnership of Kern (CAPK) was awarded a CalEITC Education and Outreach grant administered by CSD.

CAPK conducted strategic outreach in low-income Spanish speaking neighborhoods and communities to increase awareness of CalEITC. Efforts included high profile television and radio advertisements, as well as direct outreach. CAPK also developed a highly successful partnership with Community Service Employment Training (CSET), the CSBG agency in neighboring Tulare County. CSET fully integrated CalEITC education in their daily operations, including workshops with Health and Human Services Welfare to Work participants. CSET recruited and trained “Next Step” program participants (Welfare to Work) to volunteer for free tax preparation services. Volunteers gained valuable employments skills and experience that supported their transition to steady employment.

CAPK worked closely with CSD, CSET, and other local resources to reach more CalEITC eligible tax filers. The partnership between CSD, CAPK, and CSET effectively leveraged CalEITC outreach efforts and provided opportunities to “Next Step” participants with beneficial training and employment skills to enter the workforce.

STATE ACCOUNTABILITY REQUIREMENTS

Public Hearing

The combined public and legislative hearing was hosted jointly by the California State Senate and Assembly, Human Services Committees and other interested parties on August 27, 2019 at 2:00 p.m. at the State Capitol, Room 3191 in Sacramento, California.

Public Notice

Public notice was published for ten days prior to the public hearing for the 2020-2021 CSBG State Plan and Application using CSD's Public Website: <http://www.csd.ca.gov> and social media channels to notify internal and external stakeholders, as well as the public. A notice was sent to all CSBG eligible entities through CSD's Provider Website.

Public Inspection

Although not considered a State accountability requirement, the draft 2020-2021 CSBG State Plan and Application was published on CSD's Public Website at <http://www.csd.ca.gov> on July 31, 2019. Additionally, CSD transmitted the State Plan to all CSBG eligible entities, the California State Senate and Assembly Human Services Committees and other interested parties. The public was given the opportunity to review and submit comments on the State Plan.

Written comments were accepted until 5:00 p.m. on August 27, 2019. Comments were submitted via email to CSBG.Div@csd.ca.gov or mailed to:

Department of Community Services and Development
Attention: Community Services Division
2389 Gateway Oaks Drive, #100
Sacramento, CA 95833

Monitoring and Corrective Action

Monitoring Schedule and Policies

Monitoring Schedule – Fiscal Year 2020

CSBG Agency	Monitoring Type	Review Type	Target Quarter	Description of “Other”
Community Action of Napa Valley	Full Onsite	Onsite Review	FY1 Q3	
San Benito County Health and Human Services Agency, Community Services and Workforce Development	Full Onsite	Onsite Review	FY1 Q3	
California Human Development Corporation	Full Onsite	Onsite Review	FY1 Q3	
Community Action Commission of Santa Barbara County	Full Onsite	Onsite Review	FY1 Q2	
Proteus, Inc.	Full Onsite	Onsite Review	FY1 Q2	
Community Action of Ventura County, Inc.	Full Onsite	Onsite Review	FY1 Q2	
Rural Community Assistance Corporation	Full Onsite	Onsite Review	FY1 Q3	
Community Action Board of Santa Cruz County, Inc.	Full Onsite	Onsite Review	FY1 Q3	
Foothill Unity Center, Inc.	Full Onsite	Onsite Review	FY1 Q3	
Community Action Partnership of Kern	Full Onsite	Onsite Review	FY1 Q3	
Long Beach Community Action Partnership	Full Onsite	Onsite Review	FY1 Q3	
Project GO, Inc.	Full Onsite	Onsite Review	FY1 Q3	
Sacred Heart Community Service	Full Onsite	Onsite Review	FY1 Q2	
Monterey County Community Action Partnership	Full Onsite	Onsite Review	FY1 Q2	
North Coast Opportunities, Inc.	Full Onsite	Onsite Review	FY1 Q2	
Community Action Partnership of San Bernardino County	Full Onsite	Onsite Review	FY1 Q2	
Kings Community Action Organization, Inc.	Full Onsite	Onsite Review	FY1 Q2	

CSBG Agency	Monitoring Type	Review Type	Target Quarter	Description of "Other"
Campesinos Unidos, Inc.	Full Onsite	Onsite Review	FY1 Q3	
Karuk Tribe	Full Onsite	Onsite Review	FY1 Q3	
Community Action Partnership of Orange County	Full Onsite	Onsite Review	FY1 Q3	
Community Services & Employment Training, Inc.	Full Onsite	Onsite Review	FY1 Q3	
Community Action Partnership of Riverside County	Full Onsite	Onsite Review	FY1 Q3	
County of Los Angeles Workforce Development, Aging and Community Services	Other	Desk Review	FY1 Q3	May include an in-house review of fiscal and programmatic data*
Sacramento Employment and Training Agency	Other	Desk Review	FY1 Q1	*
Modoc-Siskiyou Community Action Agency	Other	Desk Review	FY1 Q1	*
Community Action Marin	Other	Desk Review	FY1 Q1	*
Sutter County Community Action Agency	Other	Desk Review	FY1 Q1	*
Yuba County Community Services Commission	Other	Desk Review	FY1 Q1	*
Inyo Mono Advocates for Community Action, Inc.	Other	Desk Review	FY1 Q1	*
Nevada County Department of Housing and Community Services	Other	Desk Review	FY1 Q1	*
Shasta County Community Action Agency	Other	Desk Review	FY1 Q1	*
Center for Employment Training	Other	Desk Review	FY1 Q1	*
Fresno County Economic Opportunities Commission	Other	Desk Review	FY1 Q1	*
San Joaquin County Department of Aging and Community Services	Other	Desk Review	FY1 Q1	*
County of San Diego, Health and Human Services Agency,	Other	Desk Review	FY1 Q1	*

CSBG Agency	Monitoring Type	Review Type	Target Quarter	Description of "Other"
Community Action Partnership				
Del Norte Senior Center	Other	Desk Review	FY1 Q1	*
El Dorado County Health & Human Services Agency	Other	Desk Review	FY1 Q1	*
Community Action Partnership of San Luis Obispo County, Inc.	Other	Desk Review	FY1 Q1	*
Community Action Partnership of Madera County, Inc.	Other	Desk Review	FY1 Q1	*
Contra Costa Employment & Human Services	Other	Desk Review	FY1 Q1	*
Berkeley Community Action Agency	Other	Desk Review	FY1 Q1	*
Community Design Center	Other	Desk Review	FY1 Q1	*
San Mateo County Human Services Agency	Other	Desk Review	FY1 Q1	*
County of Los Angeles Department of Public Social Services	Other	Desk Review	FY1 Q1	*
Los Angeles Housing + Community Investment Department	Other	Desk Review	FY1 Q1	*
Merced County Community Action Agency	Other	Desk Review	FY1 Q1	*
Amador-Tuolumne Community Action Agency	Other	Desk Review	FY1 Q1	*
Community Action Agency of Butte County	Other	Desk Review	FY1 Q1	*
County of Yolo, Dept of Employment & Social Services	Other	Desk Review	FY1 Q1	*
Plumas County Community Development Commission	Other	Desk Review	FY1 Q1	*
Community Action Partnership of Sonoma County	Other	Desk Review	FY1 Q1	*
Calaveras-Mariposa Community Action Agency	Other	Desk Review	FY1 Q1	*
Northern California Indian Development Council, Inc.	Other	Desk Review	FY1 Q1	*

CSBG Agency	Monitoring Type	Review Type	Target Quarter	Description of "Other"
Redwood Community Action Agency	Other	Desk Review	FY1 Q1	*
Tehama County Community Action Agency	Other	Desk Review	FY1 Q1	*
Central Valley Opportunity Center, Inc. MSFW	Other	Desk Review	FY1 Q1	*
Community Action Partnership of Solano	Other	Desk Review	FY1 Q1	*
City of Oakland, Dept. of Human Services	Other	Desk Review	FY1 Q1	*
Glenn County Human Services Agency	Other	Desk Review	FY1 Q1	*
Urban Services YMCA	Other	Desk Review	FY1 Q1	*

[See Attachment 4: CSD California State Monitoring Procedures for California's CSBG monitoring policy.](#)

Corrective Action/Termination

42 U.S.C. §9915 of the Federal CSBG statutes specifies procedures for corrective action, termination, and reduction of funding in compliance with Federal law. The process includes:

1. Inform the eligible entity of the deficiency to be corrected;
2. Require the eligible entity to correct the deficiency;
3. Offer technical assistance to help correct the deficiency, if appropriate; and
4. Allow the eligible entity to develop and implement a quality improvement plan (QIP) to correct the deficiency.

CSD cooperates fully with investigations, audits, and program reviews conducted by the Federal government by providing access to State fiscal and programmatic records. Access to eligible entity fiscal and programmatic records is assured through contract requirements.

CSD will submit written documentation to OCS within 30 calendar days of the State approving a QIP. The documentation will describe the details of the QIP, and the corrective action and timeline of actions to be completed. CSD will provide applicable updates to OCS and notification of the resolution of the QIP and/or required subsequent action.

The State will assure, per 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).”

Policies on CSBG Agency Designation, De-designation, and Re-designation

The State CSBG statute or regulations that provides for the designation of new eligible entities is addressed in California Government Codes §12750.1. and §12750.2 (Appendix -Attachment 5).

The State CSBG statute and/or regulations provide for de-designation of eligible entities. This subject is addressed in California Government Code §12781 and 22 CCR §100780 (Appendix - Attachment 6).

Organizational Standards

CSD conducts an annual assessment for each CSBG agency to determine if the organizational standards have been met. The assessment is conducted through a web-based system that includes required submission of all applicable documentation from each eligible entity. Upon completion of an in-house assessment and evaluation, CSD will analyze the information and validate that the required supporting documentation meets the standard. If it is determined that the standard is not met, a TAP will be initiated. Upon mutual agreement of the TAP, CSD will work with the CSBG agency to provide assistance to meet the standards. Upon final submission of the organizational standards, the agency will be notified of their final assessment score.

CSD will exempt the CDC and RCAC from meeting the Organizational Standards. Both entities are designated as LPAs that are funded from the CSBG discretionary funds and are not required to have a tripartite board. The Karuk Tribe of California will also be exempt from meeting the Organizational Standards. The Karuk Tribe of California is a NAI Tribe that is governed by a nine-member Tribal Council and is not required to administer the CSBG through a tripartite board.

During calendar year 2018, 71 percent of CSBG agencies met 100 percent of the State adopted Organizational Standards. The State expects 72 percent of eligible entities will meet all the State-adopted Organizational Standards in the next year.

Fiscal Controls

CSBG funded administrative and programmatic costs are tracked through the statewide financial reporting and accounting system, Financial Information System for California (FI\$Cal). All Federal Trust Fund (FTF) activities are accounted by the State Controller’s Office (SCO).

FI\$Cal allows CSD and eligible entities within the State who receive Federal funding to account at the appropriation and individual account levels to facilitate control and reconciliation with SCO accounts.

Audits

Single Audit Management Decisions

CSBG agencies are required to have a single agency-wide audit conducted in accordance with the Office of Management & Budget. The CSD Audit Services Unit (ASU) reviews the annual audits that are submitted by the agencies that receive funding through CSD.

CSD conforms with the single audit as dictated in 2CFR200.521. Further, CSD adheres to the requirements through its process with the SCO. The SCO has the responsibility for reviewing the audit reports for compliance with Title 2 CFR requirements (generally referred to as crosscutting issues). As the pass-through entity, the CSD ASU has the responsibility for verifying that Federal funds administered by CSD are expended in accordance with Federal regulations, statutory requirements, State law, and contract provisions. For agencies that the SCO does not have oversight responsibility, CSD reviews the independent auditors' reports for compliance with Title 2 CFR as well as for financial compliance with the applicable regulations and laws.

Per Title 2CFR200.521, CSD ASU has six months from the date that the audit report is received to address and resolve any issues identified. Audit reports are received in accordance with 2CFR200.501. The Federal awarding agency or pass-through entity responsible for issuing a management decision must do so within six months of acceptance of the audit report.

When the audit is received, the auditor:

- Collects the closeouts for the contracts that are completed in the audit report. If a closeout report has not been received, the program analyst is contacted to determine the status of the closeout.
- Collects relevant materials from prior audit reports that contain contracts that are included in the current audit.
- Compares CSD financial records of disbursements to reported expenditures and total audited costs. (Supplemental schedules required in CSD contract language form the basis for CSD's final reconciliation of completed contracts.)
- Identifies a finding for each discrepancy noted when discrepancies between audited costs and reported and costs are noted. Each finding indicates what action the agency needs to take to clear/resolve the finding. When it is warranted, CSD's Financial Services Unit is notified to establish an account receivable.

- Issues a management decision addressing the findings identified during CSD's review to the eligible entity in a transmittal letter.

Federal Investigations

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

In accordance with Section 678D of the Act, as required by the assurance under Section 676(b)(7) of the Act, the State will “permit” and cooperate with Federal investigations undertaken.

Federal Certifications

As the lead agency designated to administer CSBG in California, CSD certifies that it will meet the following Federal certifications:

Lobbying

Certification for Contracts, Grants, Loans, and Cooperative Agreements

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

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, “Disclosure Form to Report Lobbying,” in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including

subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

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

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering 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.

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)

By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.

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.

- (1) For grantees, other than individuals, Alternate I applies.
- (2) For grantees who are individuals, Alternate II applies.
- (3) 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.
- (4) 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).
- (5) 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.
- (6) Definitions of terms in the Non-Procurement 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 sub recipients 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:

**2389 Gateway Oaks Drive, #100
Sacramento, Sacramento County, California, 95833**

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.

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

- (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.

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.

PROFILE OF PARTICIPANTS SERVED

Exhibit A: Gender Distribution of Participants Served in 2018*

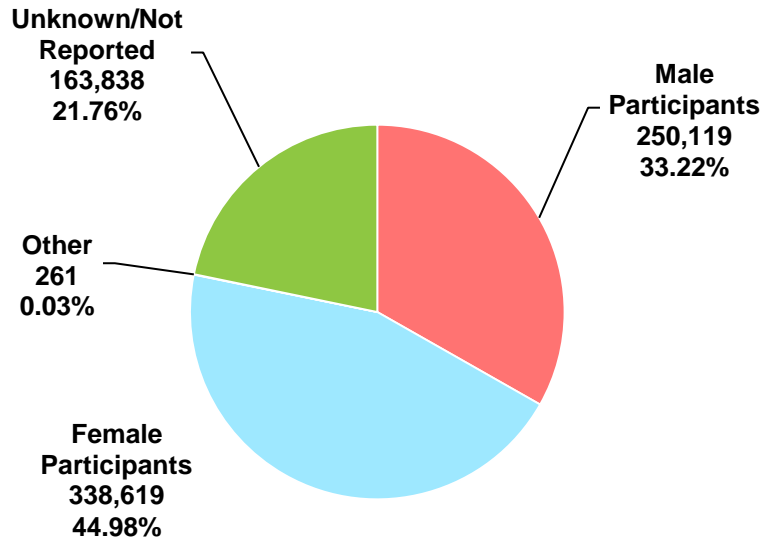
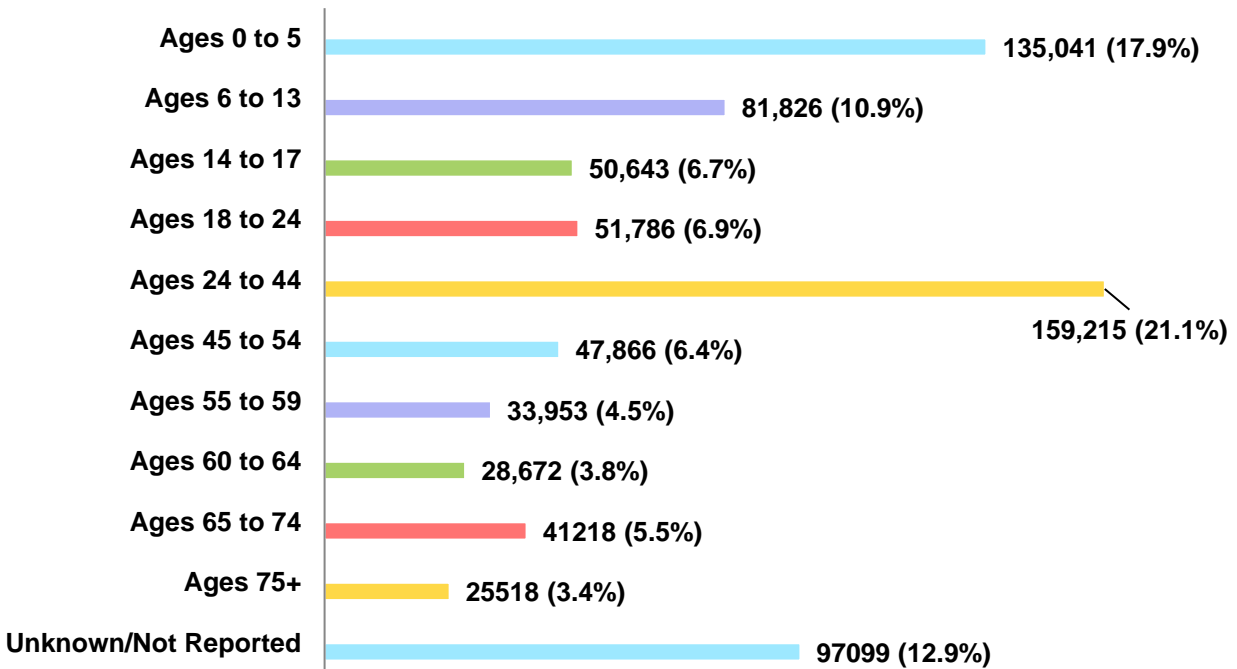


Exhibit B: Age of Participants Served in 2018*



*As reported in the 2018 *CSBG Annual Report*, data subject to final approval.

Exhibit C: Ethnicity of Participants Served in 2018*

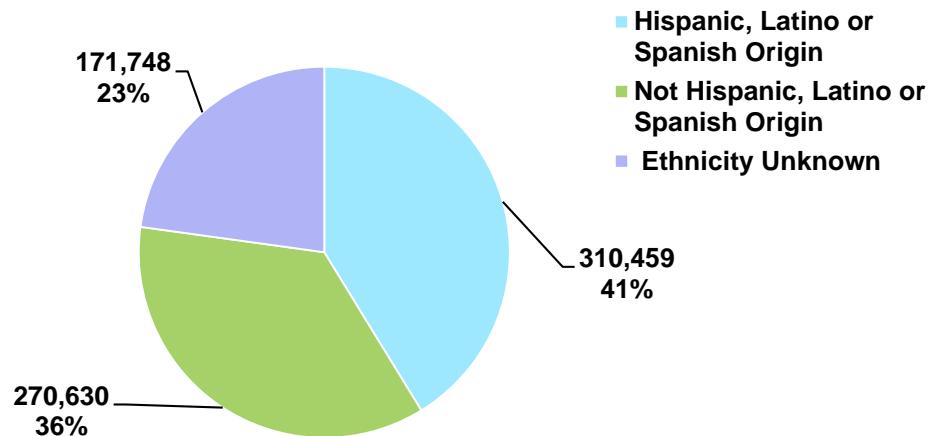
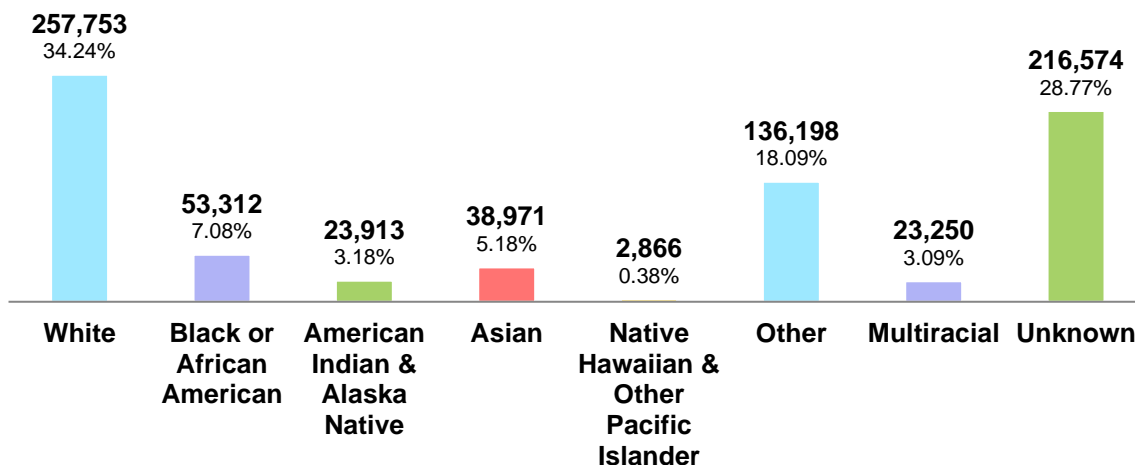


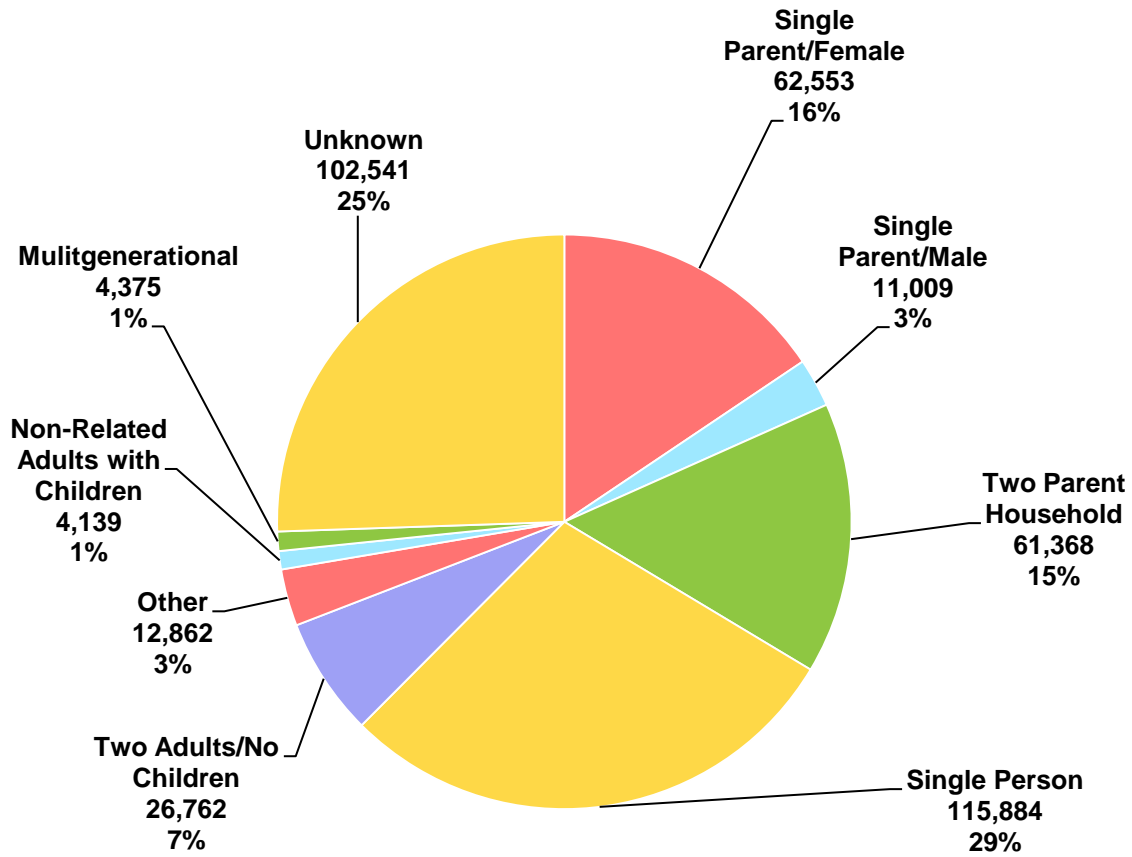
Exhibit D: Race of Participants Served in 2018*



*As reported in the 2018 *CSBG Annual Report*, data subject to final approval.

The data reported in Exhibit C and Exhibit D align with data collection by the United States Census Bureau. Individuals are asked to provide answers to two separate questions that address ethnicity and race separately, regardless of their response to either question, as they are viewed by the Census as separate identity classifications. If ethnicity or race are unknown or not collected, those unduplicated counts are included in the unknown category.

Exhibit E: Family Type of Participants Served in 2018*



*As reported in the 2018 *CSBG Annual Report*, data subject to final approval.

APPENDIX

Attachment 1: State's Official CSBG Designation Letter

Attachment 2: Documentation of Legislative and Public Hearing

Attachment 3: Public Hearing Transcript

Attachment 4: CSD California State Monitoring Procedures

Attachment 5: California Government Codes §12750.1 and §12750.2

Attachment 6: California Government Code §12781 and 22 CCR §100780

Attachment 7: CSBG Program Notice (CPN-C-16-01) Eligibility for Households
Receiving CalWORKs Benefits

Attachment 8: Glossary of Terms

State's Official CSBG Designation Letter

To be provided in final draft.

Documentation of Legislative and Public Hearing

To be provided in final draft.

Public Hearing Transcript

To be provided in final draft.

Community Services Block Grant

Monitoring Procedures



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The Community Services Block Grant Monitoring (CSBG) Procedures have been prepared by the Community Services Division, Field Operations Unit (FOU), to provide uniform procedures and guidance to FOU staff for the administration of the Community Services Block Grant Program.

PROGRAM OVERVIEW

Federal Administration

Community Action originated with President Lyndon B. Johnson's War on Poverty and the 1964 Economic Opportunity Act. Public agencies and private nonprofits called Community Action Agencies (CAA) were formed to promote self-sufficiency and respond to immediate social and economic needs within their communities. In 1981, several funding streams were consolidated into the Community Services Block Grant. The Community Services Block Grant refers to the federal funds and program established by the CSBG Program in the Omnibus Budget Reconciliation Action of 1981 as contained in Public Law 97-35, as that law has been amended from time to time and as currently codified as Section 9901 et. seq. of Title 42 of the United States Code.

The CSBG Program is funded under the U.S. Department of Health and Human Services, Administration for Children and Families (ACF), Office of Community Services (OCS). CSBG funds are distributed to 50 states, U.S. Territories, Native American Indian Tribes and other organizations. CSBG activities are carried out by a national network of over 1,000 CSBG "eligible entities" which provide a diverse range of services for, and advocacy on behalf of, low-income individuals and families. An eligible entity may include a private nonprofit organization or public agency that operates one or more projects funder under the CSBG Program in accordance with federal law. By law, at least 90 percent of a State's CSBG allocation must be allocated to local eligible entities.

State Administration

California Government Code §12725 et seq. provides that the CSBG Program shall be governed by the principle of community self-help, thereby promoting new economic opportunities for Californians living in poverty through well-planned, broadly-based and locally-controlled programs of community action. It also provides authorization for the Governor of the State of California to assume responsibility for California's CSBG Program and for the state to implement this block grant in conformity with the laws, principles, purposes and policies of the CSBG Program. The Governor has designated the California Department of Community Services & Development (CSD) as the lead Department for purposes of carrying out California's CSBG activities and ensuring program compliance.

CSD's current network of CSBG eligible entities consists of approximately 60 non-profit and local governmental organizations (Community Action Agency, Migrant Seasonal Farm Workers (MSFW), Native American Indian Program (NAI) and Limited Purpose Agency (LPA)) that receive CSBG funds. CSD's eligible entities are required to conduct

a needs assessment, develop a Community Action Plan, and offer services based on identified local needs.

CSBG funds result in innovative programs that address the leading causes of poverty as determined locally by community-based organizations and promote the goals of self-sufficiency and independence among low-income individuals.

For example, CSBG funding supports projects that:

- Lessen poverty in communities
- Address the needs of low-income individuals including the homeless, migrant seasonal workers, youth and the elderly
- Provide access to early childhood programs
- Provide services and activities addressing employment, education, better use of available income, housing, nutrition, emergency services and/or health

The flexible use of CSBG funds allows services offered throughout the State to vary depending on the local needs assessment conducted in each community. CSBG is not a program, it is a funding stream.

Field Operations Unit Role

The Field Operations Unit (FOU) is responsible for ensuring each eligible entity (Agency) complies with CSBG federal and state laws, regulations, policies and contractual requirements. This is accomplished through several methods including, but not limited to, the following:

- Evaluating and approving Agency Community Action Plans (CAP), including goals, planned activities, work plans and budgets.
- Monitoring and evaluating Agency performance for compliance with provisions of applicable federal and state laws, regulations, policies, program guidelines and other contractual provisions.
- Planning and providing Agency training and technical assistance through individual consultations, written instructions, and webinars.
- Consulting with and otherwise advising CSD management and staff on policies and procedures that impact CSBG Program activities.

MONITORING PROGRAM OVERVIEW

Pursuant to the CSBG Act (42 U.S.C. §9901 et seq.), Public Law Section 678B, CSD has responsibility to ensure CSBG Agencies carry out their programs in accordance with all applicable laws, regulations, policies and the executed contract.

The FOU's monitoring objectives are to determine if Agencies are:

- Complying with federal and state laws, regulations and policies.
- Carrying out their CSBG programs as approved by their CAP.
- Carrying out their CSBG programs in accordance with their Work Plan.
- Demonstrating a continuing capacity to carry out the approved programs.
- Requesting reimbursement only for approved budget costs.
- Needing additional training and technical assistance.
- Meeting applicable Organizational Standards.

Field Representative Role and Responsibilities

The Field Representative's role is multi-faceted, challenging, and requires the ability to proactively participate in the monitoring of the Agencies and their contracts. The Field Representatives are considered to be the critical link, the liaison between the Department and the Agencies; without their active involvement, the ability to appropriately monitor, support, and facilitate transactions would be greatly diminished.

More specifically, Field Representatives monitor, evaluate and train agencies to ensure compliance with laws, regulations, and contracts administered by CSD, helping them to improve service delivery, increase capacity, and produce greater outcomes. Additionally, Field Representatives conduct analytical studies, analyze and evaluate proposals, and review and/or evaluate Agency requests.

During the performance of duties, the Field Representative is expected to:

- A. Be proactive in the oversight of their assigned Agencies.
- B. Develop and maintain a positive rapport with their assigned Agencies.
- C. Be receptive to ideas and responsive to Agency needs.
- D. Be courteous, helpful, professional, and timely.
- E. Provide timely and accurate reviews of program deliverables.

DESCRIPTION OF MONITORING ACTIVITIES

The FOU monitoring activities occur year-round, in the FOU's office and at the Agency's site. Monitoring is conducted in collaboration with Agency staff and in a manner to assist Agencies with the most efficient and effective uses of federal funds to build capacity,

improve service delivery, and achieve intended outcomes with the goal of helping families move out of poverty.

Following is a brief description of the FOU's reviews and monitoring activities:

A. Community Action Plans (CAP): Agencies must complete a Community Action Plan (CAP), as a condition to receive CSBG funding.

Agency CAPs are to be submitted biennially to the FOU by June 30. The CAP serves as the Agency's two-year roadmap demonstrating how it plans to deliver services. It identifies the causes and condition of poverty, assesses poverty-related needs, including resources in the community and establishes detailed plan, goals, and priorities for strategically delivering these services to individuals and families most affected by poverty. The CAP also identifies eligible activities to be funded in the program service areas and the needs that each activity is designed to meet.

The following is a list of the components typically included in the CAP.

- Cover Page/Agency Certification
- Compliance with Organizational Standards
- State and Federal Assurances Certification
- Vision Statement
- Mission Statement
- Tripartite Board of Directors
- Documentation of Public Hearing(s)
- Community Needs Assessment
- Community Needs Assessment Process
- Community Needs Assessment Results
- Service Delivery System
- Linkages and Funding Coordination
- Monitoring
- Data Analysis and Evaluation
- Appendix (as required)

The FOU's review of the CAP typically occurs during July and August. The Field Representative evaluates the CAP, including goals, planned activities, priorities, including adherence to the Organizational Standards and other supporting documentation for completeness and compliance. The Community Action Plan Review Analysis form (CSD 410) is used to complete the CAP review.

Following the Field Representative's review and acceptance of the CAP, a letter is sent to the Agency acknowledging receipt and acceptance of their CAP.

B. Contracts: CSD enters into a Standard Agreement (contract), (STD 213), with Agencies receiving CSBG funds. The Annual contract term is January 1st to December 31st. The contract, which is entered into after an Agency's CAP is accepted by the FOU, specifies the grant amount, scope of work, requirements, and

other terms and conditions. Development of the contract is a collaborative effort involving several CSD Units. The contract is sent to Agencies in October for review, signature, and return of several documents as stipulated in the contract.

CSD employs a parallel contract execution process. Concurrent with the Contractor's hardcopy submission of the CSBG Annual Agreement, the Contractor must also email specific project deliverables (budget forms, budget narrative, current board roster, board meeting schedule, Annual workplan, etc.) to their assigned Field Representative for review. The Contracts Unit reviews the hardcopy contract package submitted by the agency, and if complete the package is sent to CSD's Deputy Director of Administrative Services for execution and the executed contract is delivered to the FOU. Upon receipt of the emailed Agreement package the Field Representative prepares the contract file folder and completes a thorough review/analysis of the contract deliverables. Following completion of this review, the Field Representative signs the Contract Review Tracking Sheet (CSD 473) and forwards the Contract Package to the FOU Manager for review. Upon approval by the FOU Manager, the Field Representative sends a notification to the Fiscal Unit, which authorizes the issuance of the Working Capital Advance (WCA) and payment of subsequent invoices.

- C. Pre-Monitoring Assessment (PMA): The PMA is an in-house review process conducted annually by the assigned Field Representative, usually between December and prior to the start of the monitoring season. The PMA is intended to identify key contractual factors (based upon the CSBG annual contract) along with administrative or programmatic events, which may indicate a potentially underperforming agency, an administratively challenged agency or simply an agency in need of training /technical assistance.

The PMA is designed to identify early warning signs that could be mitigated before the Agency is in an at-risk situation. Items on this assessment correspond with items on the Desk Review and On-Site Review Tools and are used as part of CSD's comprehensive CSBG Monitoring Process.

The Pre-Monitoring Assessment Tool is used to perform the PMA. Agency compliance is assessed in the areas of: Board Governance, Fiscal Procedures, Program Performance, Responses to and measured progress to resolve open Monitoring Findings/Technical Assistance Plans, Organizational Standards compliance, key staffing retention, and general items. The PMA assesses key administrative, programmatic and fiscal factors; any cumulative result exceeding the acceptable assessment total score may be grounds for an unplanned onsite visit.

The completed Pre-Monitoring Assessment Tool is submitted to the FOU Manager for review and issues identified during the PMA are discussed with the FOU Manager. For any agency that scores higher than the acceptable score on the Pre-Monitoring Assessment Tool, the Field Representative will schedule a meeting with the FOU manager to decide what the Agency may need up to and including an

unplanned onsite visit. Based upon this discussion the FOU Manager may also decide to include other CSD units that might participate in the visit.

- D. Desk Review: This is an in-house review process that is conducted annually usually between April and October, for all Agencies, with the exception of those agencies that have received an onsite monitoring visit during the year. The review assesses an Agency's overall capacity to administer their CSBG Program and determines whether the Agency has any training and technical assistance needs. The scope of the review may include an assessment of the Agency's board governance, fiscal progress based upon the agency's 3-year historical spending practices, programmatic performance, compliance with Organizational Standards and any open findings from previous monitoring reports. These documents are submitted during the contract term and are readily available to the Field Representative. Any follow up needed is conducted at the time of the document/data review.

The Agency will receive written notification/letter summarizing the results of the desk review no later than five working days following the review.

- E. On-site Monitoring Visit: Pursuant to the CSBG Act (42 U.S.C. §9901 et seq.), Agencies are required to have an on-site monitoring visit conducted once during each three (3) year period. A new CSBG eligible entity is required to have an on-site visit immediately after the completion of its first year after being designated as an eligible entity. The on-site monitoring visit is a comprehensive review to assess an Agency's overall capacity to administer their CSBG Program in compliance with laws, regulations, policies and contractual requirements. The on-site monitoring season generally runs March through October.

The on-site visit involves a partnership between the Agency and the Field Representative to assist with and ensure any compliance deficiencies are identified early and are corrected in a timely fashion. Agencies are expected to cooperate with the FOU by providing access to all programs, records, documents, resources, personnel, inventory, and other documentation reasonably related to the administration and implementation of the services and activities funded by CSBG funds including the direct services performed by subcontractors. When possible, the on-site visit is scheduled during the time of the Agency's Board meeting, to provide an opportunity for the Field Representative to attend the Board meeting.

The Field Representative coordinates a mutually agreed to date for the onsite visit and written confirmation is provided to the Agency generally between November and December of the year prior to the scheduled visit.

Next, a document request letter will be sent to the Agency no later than 45 calendar days in advance of the on-site visit. The letter will include details of the monitoring visit, such as the duration of the visit, documentation that will be requested before or during the monitoring and other details such as our agreed upon times for the entrance conference, program site visits and the exit conference.

The documents review process is accomplished via a three-phased approach.

In phase I, Agencies are requested to submit the following documents (upload to the eGov Document Portal, or scan and email to the assigned Field Representative) to CSD prior to the on-site visit.

- Procurement Policy
- Equipment Log (If applicable)
- Verification that Working Capital Advance has been deposited into an interest-bearing account
- Child Support Referral Policy or Child Support Referral Literature
- Records Retention Policy (Reference Org Std 8.13)
- Cost Allocation Plan
- Subcontractor List (CSD Form 163)
- Subcontractor Reviews/Monitoring Reports
- Subcontractor Monitoring Policy and Procedures
- Current Board Roster – if more than 3 months old
- Current Bylaws
- Outstanding Board Meeting Minutes
- Outreach Literature

The eGov Document Portal or Data repository, was recently implemented in response to the network's request for a streamlined method to submit and store commonly requested program documents to CSD. The repository will serve as the primary location for agencies to upload and store commonly requested documents. The Field Representative will retrieve documentation as needed from the repository, thus eliminating the need to email agencies requesting specific documentation. If the agency's documentation is not stored in the repository, CSD will contact the agency and request they upload the document(s) to the repository.

Additionally, storing common documents in the repository will ensure that items are readily available to upload to the applicable organizational standard(s). The eGov Document Portal categorizes each document for easy accessibility. The Data Repository is also accessible by the Energy Division for dual CSBG and Energy service providers. The document repository will reduce the number of requests for the same documents from CSD.

The Field Representative reviews the standard documentation for completeness and adherence to the applicable laws and regulations and develops a list of questions to discuss with the Agency, and/or requests additional information. During this first phase, the Field Representative will initiate an expenditure lifecycle review as well as a programmatic review. For the expenditure lifecycle review, the Field Representative will review previously submitted financial (monthly or bi-monthly) expenditure activity reports and select two to four expenditure line items based upon the Agency's annual CSBG allocation (see the Expenditure and Programmatic

Criterion chart below). The Field Representative will request the general ledger entries that support the specific line item amount.

Expenditure and Programmatic Criterion

The Field Representatives use the tables below to determine the number of transactions and client files that will be reviewed during the onsite process.

CSBG Allocation	Expenditure Line Items	Individual Invoices/Charges (Agency General Ledger)	Total # of Transactions to be Reviewed
Under \$300,000	2	3	6
Between \$300,001 to \$1 Million	3	3	9
Over \$1 Million	4	3	12

CSBG Allocation	FNPI (CSBG Annual Report)	Client Files (From Agency List)	Total # of Client Files to be Reviewed
Under \$300,000	3	3	9
Between \$300,001 to \$1 Million	4	3	12
Over \$1 Million	5	3	15

The programmatic review is based upon actual data (CNPI's and FNPI's) Agencies submit in the CSBG Annual report. Again, based upon the Agency's annual CSBG allocation the Field Representative selects three to five outcome indicators for testing and outcome verification. In this phase, the Field Representative will request documentation that provides a list (of clients) that matches the number of actual results reported in the Annual Report.

Phase II of the documentation review process involves a more detailed information request and review for both expenditures and programmatic data.

The Phase II programmatic review entails a similar supporting documentation request and review. The Field Representative will identify between 3 – 5 client files from the client list for each FNPI that will be tested. Requested documentation includes proof of income eligibility family size, type of service received, and dates that services were received, client's last name and any data associated to verify that the outcome was achieved. CSD provides an encryption protocol to protect

confidentiality as one goal of the onsite process is to perform most of the client file verification at CSD and prior to the onsite.

The life cycle testing of expenditures continues with the receipt of the Agency's supporting financial documentation, which typically includes payroll registers, timesheets, subcontractor invoices, travel requests, agency invoices, and canceled checks. The review begins at the initial point of the request for purchase. The field representative will review the supporting documentation to ensure purchases were made and reconciled according to the Agency's Procurement Policy and Cost Allocation Plan. CSD also confirms that the appropriate signatures and approvals have been given for the purchase.

Prior to conducting the onsite, the Field Representative schedules a pre-onsite meeting with the FOU Manager no less than three working days prior to the onsite visit. The purpose of the pre-meeting is to discuss the preliminary results of the desk review and other monitoring documentation/information. Listed below is the information that is presented to the FOU Manger for discussion.

Discussion items at Pre-Onsite meeting:

- Results of preliminary desk review
- Organizational Standards results
 - Open Technical Assistance Plans
- Issues or notable comments from board minute review
- Board Governance
 - Involvement
 - Vacancies
- Budget line items selected for lifecycle review from open contracts
- Unresolved monitoring findings
- Year to Date expenditures (including analysis of current spending practices compared to the agency's 3-year historical spending trend)
- Other pertinent issues that will be discussed during the onsite visit
- Potential training and technical assistance topics

Phase III is the actual Onsite Monitoring visit. The on-site monitoring visit begins with an Entrance Conference with the Executive Director, Finance Manager, and anyone else the Agency deems appropriate. CSD routinely requests Agencies to invite Board members to attend the Entrance Conference. The Entrance Conference may be an excellent opportunity to increase the knowledge of board members and further inform them about their CSBG funding.

Typical topics discussed at the Entrance Conference include:

- Overview of Monitoring Process (a one-page handout)
- CSD Updates (new staff, new programs)
- Current year discretionary funding opportunities
- Results from CSD Desk Review

- CSBG Advisory Committee Meetings (upcoming schedule and location)
- Organizational Standards (Discussion of Compliance/Status of TAPs)
- Development of Community Action Plan (if Applicable)
- 3 Year Historical Expenditure Spending trend report

During the visit the Field Representative utilizes the On-site Monitoring Tool. The Onsite Monitoring tool is an instrument that essentially becomes the roadmap for the visit. The Tool is sent to the Agency prior to the Onsite visit with the Phase II data request; and though it is a fillable document, the purpose is not for Agency staff to complete it, but rather the tool will guide the content/discussion during the visit. Agencies preparing for the onsite can use it as a checklist (i.e. in preparation for the visit) to ensure all required documentation is collected and emailed to CSD prior to the visit.

The Onsite tool allows the FOU to consistently perform a set of standard assessments and observations for every Agency, that includes reviewing fiscal, administrative and programmatic documentation; reviewing Subcontractor management procedures, interviewing key staff and Board members; and observing programs and Board participation.

At the conclusion of the on-site monitoring visit, an Exit Conference is held typically with the Executive Director, Finance Manager, and anyone else the Agency deems appropriate. The Exit Conference provides an opportunity for the Field Representative to summarize his/her observations during the review and notify the Agency whether there are any potential findings of non-compliance as a result of the review.

Following the Onsite visit, a post onsite meeting is held with the FOU Manager to provide a quick update on the visit and discuss any potential finding, observations, recommendations, and or Training and Technical Assistance. The post meeting is scheduled no later than 3 working days after returning to the office. Following the post-onsite meeting the Field Representative ensures all documents are properly labelled and filed electronically; including a list of documents that are saved electronically. The following documents are contained in the Onsite accordion file:

- Board Roster (CSD 188)
- Board meeting minutes (those mentioned in the Desk Review)
- Entrance conference sign in sheet
- Current Expenditure Activity Report (including 3-year Historical Expenditure Spending Trend)
- Equipment list (if applicable)
- Subcontractor list (CSD 163)
- Child Support verification
- Exit Conference sign in sheet
- Programmatic documentation

- Onsite Monitoring Tool
- Fiscal documentation

Additionally, the Field Representative completes an On-site Monitoring Report. This report provides a summary of the on-site monitoring activities and includes any findings of non-compliance with statutory, regulations and/or contractual requirements supported by the facts considered in reaching the conclusion(s). Deficiencies noted in the monitoring report will be cited as follows:

- Recommendations – There is no breach of the CSD contract, and/or federal and/or state requirements; however, it is recommended by CSD to improve current processes, systems, or “best practices” that contribute to increased efficiencies.
- Observations – A compliance issue that is considered a minor breach of the contract and any material referenced within the contract. If the compliance is not remedied prior to the next monitoring review, the issue may be elevated to a Finding.
- Findings – A compliance issue with the CSBG contract, federal and/or state requirements, regulations, policies or procedures.

For each area of non-compliance, the Field Representative identifies specific corrective action by which the deficiency can be resolved and assigns due dates for the Agency to correct compliance-related deficiencies.

Corrective action citing Board vacancies will be managed as follows:

Agencies are required to submit a board roster with the annual CSBG contract.

- The board roster includes board member names, title/position on the board, specific sector, contact information, board vacancy and date of vacancy (if applicable)
- Each Agency will receive either an onsite monitoring visit or desk review where an updated roster is requested if any changes have occurred.
- The board roster is reviewed and at the time of monitoring to determine if there are any board vacancies. If a board vacancy is identified, then depending on the length of time of the board vacancy will determine what action will be applied.
 - Vacancy(ies) less than 3 months - no action taken
 - Vacancy(ies) between 3 months to 12 months – Agency is assessed an Observation
 - Vacancy (ies) More than 12 months – Agency is assessed a Finding

- Long standing board vacancies may require additional follow up or require training and technical assistance. Not correcting long standing board vacancies could potentially place an Agency on a Quality Improvement Plan (QIP)
- Follow up on filling board vacancies is conducted quarterly; the Agency is required to submit an update on the progress and activities they have completed to fill the board vacancy and a completion date by which all vacancies will be filled.
 - CSD will offer training and technical assistance if needed to assist an Agency in filling a board vacancy. In addition, CSD will provide trainings on different strategies for board recruitment.

Following the FOU Manager's approval, a draft of the onsite report is sent via email to the Agency's Executive Director for review and comment, typically within three weeks after the monitoring visit. The Agency will have five working days to review the document and submit corrections or request changes. If no comments or requests for changes are received, the Final On-site Monitoring Report is mailed to the Agency Executive Director and Board Chair within 60 calendar days of completing the on-site monitoring visit.

Along with the Final Monitoring Report, the Field Representative emails a Monitoring Satisfaction Survey to the agency to solicit input about the monitoring process. The purpose of the Monitoring Survey is to measure Community Services Block Grant (CSBG) agencies satisfaction with how the Monitoring was performed by CSD's Community Services Division - Field Operations Unit. The feedback received will assist the Field Operations Unit to further improve the way oversight responsibilities are performed to strengthen its effectiveness, increase efficiency, offer transparency, and further improve the partnership between CSD and the CSBG Agencies.

Due to the number of CSBG providers in California (approximately 60), CSD issues the same survey for a three-year cycle (the time required for every agencies to have their mandatory onsite monitoring visit). During the three-year cycle CSD continues to gather feedback while planning process improvements to be implemented at the onset of the next Onsite visit cycle. Following the completion of a cycle, improvements are implemented, another survey is developed, and the continuous improvement process continues with the next three-year cycle.

- F. Preliminary Expenditure Review: This is an in-house review that is conducted throughout the year. The expenditure review is an analysis of an Agency's expenditures as compared to the approved budget to identify and address low expenditures, budget line item overages, and/or zero reporting. CSD has developed a tool which compares the current year spending performance to the Agency's spending pattern over that past three years. The three-year historical spending trend tool provides a better picture of "typical" expenditure performance. If there is a current expenditure variance (ahead or behind), greater than 15% from the three-

year historical spending trend, CSD will contact your agency, send a copy of the chart and discuss what's going on.

- G. Annual Report: This is an in-house review process conducted in January and February. Agencies are required to submit programmatic reports to the FOU using a web-based, data entry system that automates the submission and review of Administrative, Financial and Programmatic activities and client demographic information from January 1 to December 31.
- H. Organizational Standards Review: The organizational standards are a set of measurements to ensure that each Agency has the applicable organizational capacity (fiscal and administrative) to administer the community services block grant. Annually each Agency completes an automated self-assessment including uploading verifying documentation using a web-based system for each organizational standard. CSD performs an evaluation of the documentation uploaded by the Agency to verify the standards are met. Upon completion of the review, if a Standard is deemed unmet, by CSD or if the Agency upon submission designates a Standard as unmet, a technical assistance plan is required. The Agency develops a TAP including steps to meet the standard and a timeline for completion. Following review and agreement of the Technical Assistance Plan, CSD will work with the Agency to help meet the Standard(s). Upon resolution of the Technical Assistance Plan, CSD provides the Agency with notice of satisfactorily meeting the Standard.

MONITORING FOLLOW-UP

When findings are included in the monitoring report, the Agency is required to resolve the issue on or before the established due date or within the timeframe established in the corrective action plan. Until such time, the Agency will submit a Monitoring Finding Status report providing the progress on resolving the issue. Upon receipt of the Agency's Monitoring Finding Status Report, the Field Representative conducts a review to ensure the Agency is progressing in resolving the finding(s). A letter is sent to the Agency acknowledging receipt of the status report or closing the finding.

The Field Representative will take these additional steps:

- Track monitoring findings and conduct on-going follow up based on the timeframe established in the monitoring report.
- Whenever an Agency is not compliant with submitting the applicable status update(s) or resolving a finding by the established due date, notify the Agency Executive Director by sending a follow up letter.

Pursuant to the CSBG Act (Section 678B, 678C, 42 USC 9914), unmet monitoring deficiencies will result in the FOU working more closely with the Agency to put in place a technical assistance plan or quality improvement plan, as appropriate. Below are the definitions for:

- Technical Assistance Plan: Training and technical assistance provided by CSD and/or other organizations to address deficiencies that could be resolved within one year.
- Quality Improvement Plan (QIP): The corrective steps/actions that are to be taken, and by when, to address significant/serious deficiencies. The QIP is due within 60 days after being informed of the deficiency. The FOU is required to either approve the proposed plan or specify the reasons why the proposed plan cannot be approved; and after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding of the Agency. The Office of Community Services will be informed within 30 calendar days of approving the QIP.

Whenever deficiencies are not resolved in a timely manner, it may lead to the FOU conducting follow up reviews, including a return visit to the Agency and their programs that fail to meet the goals, standards, and requirements established by the State. Also, the FOU will make training and technical assistance resources available to the Agency as directed by CSD or requested by the Agency.

Upon receipt and acceptance of the monitoring corrective action documentation or completion of the assigned action required by CSD, CSD will provide acknowledgement of the completed corrective action via a letter to the Agency Executive Director that the corrective action has been completed and the monitoring report closed.

CLOSEOUT

As required by Federal and State law, and thereby in each contract, CSD must assure that agencies submit a timely close-out package to bring closure to a contract and assure that any funds due either party are expeditiously processed.

Agencies are required to submit a contract close-out package to CSD within 90 days of the expiration of each contract but no later than March 31. The exception is when an Agency has an approved contract term extension.

The close-out of a contract does not affect the following:

- CSD's right to disallow costs and recover funds on the basis of a later audit or other review.
- The Agency's obligation to return any funds due as a result of later refunds, corrections, or other transactions.
- Records retention requirements.
- Equipment management requirements.
- Audit requirements.

The Field Representative completes a review of the Agency's close out package no later than April 30, except for those contracts that have a term extension. The review is an analysis of the close-out reports and to determine completeness, accuracy of the documents prior to closing out of the grant. A Close-out letter is issued upon determination that the entity submitted all the applicable documentation and fiscal reports.

TRAINING & TECHNICAL ASSISTANCE

Agencies must be familiar with CSBG laws, regulations, policies and program requirements. CSD is responsible for providing Agencies with a range of technical assistance and training to establish and maintain sound grants management and program practices.

The FOU serves as an official conduit of information, including laws, regulations, rules, and other official memoranda from funding sources to eligible entities. The FOU offers on-going support, training, and technical assistance, as requested or needed, to help Agencies provide services to low-income clients. Training or workshops are typically conducted prior to contract issuance and/or if necessary, for the development of Agencies' biennial Community Action Plan. Training and/or workshops may be regionalized (a North/South venue) or centralized (one workshop centrally located).

CSD established the Technical Support Unit (TSU), creating a third unit under the CSBG Division to further support and expand the department's dedication to provide on-going training and technical assistance to the CSBG network of Agencies. TSU is responsible for maintaining the effective administration of the Community Services Block Grant (CSBG), CSBG Discretionary Initiatives, and other programs as developed within the Community Services Division. The TSU works with the FOU to evaluate the performance and provides training and technical support to CSBG Agencies.

Training services are performed several ways, such as:

- A site visit to the Agency
- By telephone or Webinar
- Subject-specific regional training seminars

In addition, CSD enters into an annual contract with an association that specializes in helping CSBG Agencies increase their knowledge, skills, and capacities to fulfill their various missions. For example, through this association, Agencies may participate in network meetings to problem solve, attend conferences, receive specific training such as in building organizational capacity and community relations, and request technical assistance.

The CSD provider website offers information such as policies, trainings, informational bulletins and other important information for CSD's community service providers administering a CSBG program at: <http://providers.csd.ca.gov/>

Periodically, CSD participates in multi-state training, workshops, or conferences at the request of our funding sources. Field Representatives may be asked to participate as presenters, facilitators, and/or to provide on-site support.

CSD RECORDKEEPING

The FOU is responsible for maintaining contract files, records, and relevant documentation consistent with federal requirements and CSD's Records Retention Schedule.

The Field Representative will maintain complete, organized, and standardized contract files.

California Government Codes §12750.1 and §12750.2

California Code, Government Code - GOV § 12750.1

(a) No new community action agency may be designated by the director for a political subdivision that is served by an existing community action agency unless any of the following exist:

(1) The political subdivision is informed in writing by the director that the existing community action agency has failed to comply, after having a reasonable opportunity to do so, with the requirements of this chapter, subject to paragraph (5) of subdivision (c) of Section 12781.

(2) The political subdivision is informed by its existing community action agency that because of changes in assistance furnished to programs to economically disadvantaged persons it can no longer operate a satisfactory community action program.

(3) The director is petitioned by significant numbers of eligible beneficiaries to reconsider its existing designation and, based on that reconsideration, determines to designate an alternate community action agency.

(b) In the event that the designation of an existing community action agency is revoked, the director shall designate a new community action agency within a period of 90 days after the effective date of the revocation, subject to Section 12750.2.

(c) New community action agency designations may be made in political subdivisions or combinations of political subdivisions in a county or portion thereof for which no community action agency has been designated provided that the community to be served has a population of at least 50,000, as determined by the Bureau of Census from the most recent available census or survey. The director may waive the general requirement that the community to be served have a population of at least 50,000 in those instances where no practical grouping of contiguous political subdivisions can be made in order to meet that requirement.

(d) A private nonprofit agency that serves a political subdivision or combination of political subdivisions having more than 50,000 population shall be entitled to petition the department for State designation as a community action agency, provided it has a governing board meeting community action agency requirements and has the capability to plan, conduct, administer, and evaluate a community action program.

California Code, Government Code - GOV § 12750.2

For purposes of serving any area of the State in which community action programs cease to be provided, the director shall designate an organization in accordance with Section 9909 of Title 42 of the United States Code, as amended, and through a process that shall include all of the following:

- (a) Notice of intent to designate.
- (b) Request for proposals by any political subdivision or by any other qualified organization that can demonstrate adequate representation of low-income individuals in the development, planning, implementation, and evaluation of the community action program.
- (c) Invitation to the political subdivision to participate in the review of the proposals.

California Government Code §12781 and 22 CCR §100780

California Code, Government Code - GOV § 12781

The department shall have the following powers and duties:

- (a) Development of an orderly grant application process culminating in a prescribed contract.
- (b) Ensuring that eligible entities will have a timely cashflow within the guidelines of the Federal Cash Management Improvement Act of 1990 (P.L. 101-453), as amended. The department shall issue to each eligible entity an advance payment at the beginning of the contract period equal to 25 percent of the eligible entity's total contract amount. Payments thereafter shall be equal to expenditures reported on the eligible entity's financial progress reports, not to exceed the eligible entity's total contract amount.
- (c) Promulgation of uniform contracts management standards to include:
 - (1) Standards for fiscal control and fund accounting that do all of the following:
 - (A) Require new eligible entities to be certified by an accountant prior to receiving financial assistance.
 - (B) Require periodic financial reporting to the office and an annual audit.
 - (C) Permit a defined range of flexibility from approved budgets and the use of negotiated indirect costs rates.
 - (D) For the purpose of administrative expenditures, permit an eligible entity to use funds allocated under this chapter in an amount not to exceed 12 percent of the total operating funds of its community action program.
 - (E) Limit the use of funds for construction, as required by Federal law.
 - (2) Minimum standards for procurement to prevent conflict of interest or malfeasance.
 - (3) Standards regarding property that provide that title to property purchased with funds granted under this chapter or with funds formerly granted pursuant to the Federal Economic Opportunity Act of 1964 (Chapter 34 (commencing with Section 2701) of Title 42 of the United States Code) shall vest in the grantee, subject to conditions requiring prudent property management and the provision for disposition of the property among other eligible entities in the event of closeout.
 - (4) Procedures for the withholding of payments or recovery of moneys where the underlying cost expenditures or obligations claimed by the eligible entity are disallowed.

(5) Standards for termination or reduction of financial assistance to an eligible entity, or revocation of the designation of a community action agency, for failure to comply with this chapter. The department may terminate or reduce any financial assistance provided to an eligible entity under this chapter forthwith, if the department finds there is evidence of fraud or illegal use of funds. The department also may terminate or reduce any financial assistance to an eligible entity, if the department determines that “cause,” as defined in Section 9908(c) of Title 42 of the United States Code, as amended, exists and after providing notice and an opportunity for a hearing on the record, subject to review by the secretary consistent with Section 9915 of Title 42 of the United States Code, as amended.

(d) Promulgation of regulations pursuant to the Administrative Procedure Act (Chapter 3.5 (commencing with Section 11340), Chapter 4 (commencing with Section 11370), and Chapter 5 (commencing with Section 11500), of Part 1) that are necessary and appropriate for the effective administration of this chapter. At a minimum these regulations shall clearly define all of the following:

(1) The due process rights, including notification, right of appeal, and opportunity for a fair hearing, of eligible entities, and the procedures to be followed in order to guarantee those rights, in cases of denial of refunding, suspension, reduction, or termination of funding, or revocation of designation by the department.

(2) The obligation of eligible entities to provide a fair procedure for clients denied services by eligible entities.

(3) The requirement that community action agencies select tripartite boards that include persons who represent the poor. These regulations shall ensure that democratic procedures are fully operative and may include criteria for tenure, geographic representation, and election procedures.

(e) Establishment of procedures for orderly closeout of terminated entities.

(f) Monitoring and periodic evaluation of eligible entities, using evaluation methods and standards that have been published prior to the evaluation and that provide eligible entities an opportunity to respond to evaluation findings.

(g) Development of standards to ensure compliance by eligible entities with Federal and state requirements for public access to records, prohibition of partisan political activities, and nondiscrimination.

(h) Establishment of policies and procedures that ensure freedom of information.

(i) Fostering cooperation among community action agencies, including providing opportunities for community action agencies to work together and publishing a directory, that shall be periodically updated, of all grantees under this program and the LIHEAP (Subchapter II (commencing with Section 8621) of Chapter 94 of Title 42 of the United States Code).

(j) Establishment of procedures for the allocation of the funds available pursuant to subdivision (c) of Section 12759.

(k) Identification and encouragement of linkages with other state departments, local governments or private groups that oversee programs providing resources for low-income persons in order to coordinate existing efforts to overcome poverty.

22 CCR § 100780

§ 100780. Denial of Refunding, Suspension and Termination of Contract Procedures.

(a) Purpose and Scope -This section establishes the rules and procedures governing the denial of refunding and the suspension and termination of contracts. This section shall not apply to any administrative action based upon any violation or alleged violation of Title VI of the Civil Rights Act of 1964. In case of such violations or alleged violations, the provisions of 45 CFR Part 1010 shall apply.

(b) Definitions.

(1) The term “termination” means the cancellation by the Department of state and or Federal assistance in whole or in part, under a contract at any time prior to the time of completion.

(2) The term “suspension” means an action taken by the Department which temporarily suspends state and/or Federal assistance under the contract, pending DEO's decision to terminate the contract.

(3) The term “responsible Department official” means the Director, Deputy Director, or any other official who is authorized to make the contract in questions, or the designee of any of these officials.

(c) Failure to Comply with Contract Terms and Conditions.

When a grantee has materially failed to comply with the contract terms and conditions, the Department may suspend the contract in whole or in part.

(d) Suspension Notice.

(1) The responsible Department official shall notify the grantee in writing that the Department intends to suspend a contract, in whole or in part, unless good cause is shown why the contract should not be suspended. The notice shall specify the grounds for the proposed suspension, the proposed effective date of suspension and the grantee's right to submit written material in opposition to the intended suspension and of its right to request an informal meeting at which the grantee may respond with an attempt to show cause why such suspension should not occur. The period of time within which the grantee may submit such written material or request the informal meeting shall be specified in the notice of intent to suspend and shall be no less than 5 days after the notice has been sent. If the grantee requests a meeting, the responsible Department official shall set a time and place for the meeting, which shall not be less than 5 days after the grantee's request is received by the Department. In lieu of the right of the grantee to request an informal meeting, the responsible Department official may on his/her own initiative establish a time and place for such a meeting. In no event, however, shall such a meeting be scheduled less than 7 days after the notice of intent to suspend has been sent to the grantee. The responsible Department official may

extend the periods of time or dates previously referred to and shall notify the grantee of any such extension.

(2) At the time the responsible Department official sends the notice of intent to suspend the grantee, he/she shall also send a copy of it to any delegate agency whose activities or failure to act are a substantial cause of the proposed suspension, and shall inform such delegate agency that it shall be entitled to submit written material or to participate in the informal meeting referred to in subparagraph (d)(1) of this section. The responsible Department official may give such notice to any other delegate agency.

(3) Within 3 days of receipt of the notice, the grantee shall send a copy of these regulations to all delegate agencies which would be financially affected by the proposed suspension action. Any delegate agency which wishes to submit written material may do so within the time stated in the notice. Any delegate agency that wishes to participate in the informal meeting may request permission to do so from the responsible Department official, who may in his/her discretion, grant or deny such permission. In acting upon any such request from a delegate agency, the responsible Department official shall take into account the effect of the proposed suspension on the particular delegate agency, the extent to which the meeting would become unduly complicated as a result of granting such permission, and the extent to which the interest of the delegate agency requesting such permission appears to be adequately represented by other participants.

(4) In the notice of intent to suspend, the responsible Department official shall invite voluntary action to adequately correct the deficiency which led to the initiation of the suspension proceeding.

(5) The responsible Department official shall consider any timely material presented to him/her during the course of the informal meeting provided for in subparagraph (d)(1) of this section, as well as any showing that the grantee has adequately corrected the deficiency which led to the initiation of suspension proceedings. If after considering the material presented to him/her, the responsible Department official concludes the grantee has failed to show cause why the contract should not be suspended, he/she may suspend the grant in whole or in part and under such terms and conditions as he/she shall specify.

(6) Notice of such suspension shall be promptly transmitted to the grantee and shall become effective upon delivery. Suspension shall not exceed a 30 day period unless during such period of time, termination proceedings are initiated or unless the responsible DEO official and the grantee agree to a continuation of the suspension for an additional period of time. If termination proceedings are initiated, the suspension shall remain in full force and effect until such proceedings have been fully concluded.

(7) During a period of suspension, no new expenditures shall be made by the grantee and no new obligations shall be incurred in connection with the suspended program except as specifically authorized in writing by the responsible Department official. Expenditures to fulfill legally enforceable commitments made prior to the notice of

suspension, in good faith and in accordance with the grantee's approved work program, and not in anticipation of suspension or termination, shall not be considered new expenditures. However, funds shall not be recognized as committed solely because the grantee has obligated them by contract or otherwise to a delegate agency.

(8) The responsible Department official may in his/her discretion modify the terms, condition and nature of the suspension or rescind the suspension action at any time on his/her own initiative or upon a showing satisfactory to him/her that the grantee has adequately corrected the deficiency which led to the suspension and that repetition is not threatened. A suspension partly or fully rescinded may, in the discretion of the responsible Department official, be re-imposed with or without further proceeding. Provided, however, that the total time of suspension may not exceed 30 days unless termination proceedings are initiated in accordance with Department policies and procedures governing the termination of contracts or unless the responsible Department official and the grantee agree to a continuation of the suspension for an additional period of time. If termination proceedings are initiated, the suspension shall remain in full force and effect until such proceedings have been fully concluded.

(e) Notice and Pre-hearing Procedures.

(1) If the responsible DEO official believes a grantee's violation of the terms and conditions of its contract is sufficiently serious to warrant termination, whether or not the contract has been suspended, he/she shall state that there appears to be grounds which warrant termination and shall set forth the specific reasons therefor. If the reason(s) result in whole or substantial part from the activities of a delegate agency, the notice shall identify that delegate agency. The notice shall also advise the grantee that the matter has been set down for hearing at a stated time and place in accordance with paragraph (f) of this section. In the alternative, the notice shall advise the grantee of its right to request a hearing and shall fix a period of time which shall not be less than 10 days, in which the grantee may request such a hearing.

(2) Termination hearings shall be conducted in accordance with the provisions of paragraphs (g) and (h) of this section. They shall be scheduled for the earliest practicable date, but not later than 30 days after a grantee has requested such a hearing. Consideration shall be given to a request by a grantee to advance or postpone the date of a hearing scheduled by the Department. Any such hearing shall afford the grantee a full and fair opportunity to demonstrate that it is in compliance with all applicable laws, regulations, and other requirements. In any termination hearing, the Department shall have the burden of justifying the proposed termination. However, if the basis of the proposed termination is the failure of a grantee to take action required by law, regulation, or other requirement, the grantee shall have the burden of proving that such action was timely taken.

(3) If a grantee requests that the Department hold a hearing in accordance with subparagraph (e)(1) of this section, it shall send a copy of its request for such a hearing to all delegate agencies which would

be financially affected by the termination and to each delegate agency identified in the notice pursuant to subparagraph (e)(1) of this section. This material shall be sent to these delegate agencies at the same time the grantee's request is made to the Department. The grantee shall promptly send the Department a list of the delegate agencies to which it has sent such material and the date on which it was sent.

(4) If the responsible Department official pursuant to subparagraph (e)(1) of this section informs a grantee that a proposed termination action has been set for hearing, the grantee shall, within 5 days of its receipt of this notice, send a copy of it to all delegate agencies which would be financially affected by the termination action and to each delegate agency identified in the notice pursuant to subparagraph (e)(1) of this section. The grantee shall send the responsible Department official a list of all delegate agencies notified and the dates of notification.

(5) If the responsible Department official has initiated termination proceedings because of the activities of a delegate agency, that delegate agency may participate in the hearing as a matter of right. Any other delegate agency, person, agency or organization that wishes to participate in the hearing may, in accordance with paragraph (g) of this section, request permission to do so from the presiding officer of the hearing. Such participation shall not, without the consent of the Department and the grantee, alter the time limitations for the delivery of papers or other procedures set forth in this section.

(6) The results of the proceeding and any measure taken thereafter by the Department pursuant to this section shall be fully binding upon the grantee and all its delegate agencies whether or not they actually participated in the hearing.

(7) A grantee may waive a hearing and submit written information and argument for the record. Such material shall be submitted to the responsible Department official within a reasonable period of time to be fixed by him/her upon the request of the grantee. The failure of a grantee to request a hearing, or to appear at a hearing for which a date has been set, unless excused for good cause, shall be deemed a waiver of the right to a hearing and consent to the making of a decision on the basis of such information as is then in the possession of the Department.

(8) The responsible Department official may attempt, either personally or through a representative, to resolve the issues in dispute by informal means prior to the date of any applicable hearing.

(f) Time and Place of Termination Hearings.

The termination hearing shall be held in Sacramento, CA, at a time and place fixed by the responsible Department official, unless he/she determines that the convenience of the Department or of the parties or their representatives requires that another place be selected.

(g) Termination Hearing Procedures.

(1) The termination hearing, the decision on termination and any review thereof shall be conducted in accordance with paragraph (g), (h) and (i) of this section.

(2) The presiding officer at the hearing shall be the responsible Department official. The presiding officer shall conduct a full and fair hearing, avoid delay, maintain order, and make a sufficient record for a full and true disclosure of the facts and issues. To accomplish these ends, the presiding officer shall have all powers authorized by law, and he/she may make all procedural and evidentiary rulings necessary for the conduct of the hearing. The hearing shall be open to the public unless the presiding officer, for good cause shown, determines otherwise.

(A) After the notice described in subparagraph (g)(6) of this section is filed with the presiding officer, he/she shall not consult any person or party on a fact in issue unless on notice and opportunity for all parties to participate. However, in performing his/her functions under this subparagraph the presiding officer may use the assistance and advise of an attorney designated by the General Counsel of the Department. The attorney designated to assist him/her however, must not have represented the Department or any other party or otherwise participated in a proceeding, recommendation, or decision in the particular matter.

(3) Both the Department and the grantee are entitled to present their cases by oral or documentary evidence, to submit rebuttal evidence and to conduct such examination and cross-examination as may be required for a full and true disclosure of the facts bearing on the issues. The issues shall be those stated in the notice required to be filed by subparagraph (g)(6) of this section, those stipulated in a pre-hearing conference or those agreed to by the parties.

(4) In addition to the Department, the grantee, and any delegate agencies which have a right to appear, the presiding officer, in his/her discretion, may permit the participation in the proceedings of such persons or organizations as he/she deems necessary for a proper determination of the issues involved. Such participation may be limited to those issues or activities which the presiding officer believes will meet the needs of the proceeding, and may be limited to the filing of written material.

(A) Any person or organization that wishes to participate in a proceeding may apply for permission to do so from the presiding officer. This application, which shall be made as soon as possible after the notice of proposed termination has been received by the grantee, shall state the applicant's interest in the proceeding, the evidence or arguments the applicant intends to contribute, and the necessity for the introduction of such evidence or arguments.

(B) The presiding officer shall permit or deny such participation and shall give notice of his/her decision to the applicant, the grantee, and the Department and, in the case of denial, a brief statement of the reasons therefor. The presiding officer may, however, subsequently permit such participation if, in his/her opinion, it is warranted by subsequent circumstances. If participation is granted, the presiding officer shall notify all

parties of that fact and may, in appropriate cases, include in the notification a brief statement of the issues as to which participation is permitted.

(C) Permission to participate to any extent is not a recognition that the participant has any interest which may be adversely affected or that the participant may be aggrieved by any decision, but is allowed solely for the aid and information of the presiding officer.

(5) All papers and documents which are required to be filed shall be filed with the presiding officer. Prior to filing, copies shall be sent to the other parties.

(6) The responsible Department official shall send the grantee and any other party a notice which states the time, place, and nature of the hearing, and the legal authority and jurisdiction under which the hearing is to be held. The notice shall also identify with reasonable specificity the facts relied on in justifying termination and the Department requirements which it is contended the grantee has violated. The notice shall be filed and served not later than 10 days prior to the hearing and a copy therefor shall be filed with the presiding officer.

(7) The grantee and any other party which has a right or permission to participate in the hearing shall give written confirmation to the Department of its intention to appear at the hearing 3 days before it is scheduled to occur. Failure to do so may, at the discretion of the presiding officer, be deemed a waiver of the right to a hearing.

(8) All papers and documents filed or sent to a party shall be signed in ink by the appropriate party or his/her authorized representative. The date on which papers are filed shall be the day on which the papers or documents are deposited, postage prepaid in the U.S. mail, or are delivered in person. The effective date of the notice specifying the grounds which warrant termination shall be the date of its delivery or attempted delivery at the grantee's last known address as reflected in the records of the Department.

(9) Prior to the commencement of a hearing the presiding officer may, subject to the provisions of subparagraph (g)(2)(A) of this section, require the parties to meet with him/her or correspond with him/her concerning the settlement of any matter which will expedite a quick and fair conclusion of the hearing.

(10) Technical rules of evidence shall not apply to hearings conducted pursuant to this section but the presiding officer shall apply rules or principles designed to assure production of relevant evidence and to subject testimony to such examination and cross-examination as may be required for a full and true disclosure of the facts. The presiding officer may exclude irrelevant, immaterial, or unduly repetitious evidence. A transcript shall be made of the oral evidence and shall be made available to any participant upon payment of the prescribed costs. All documents and other evidence submitted shall be open to examination by the parties and opportunity shall be given to refute facts and arguments advanced by either side on the issues.

(11) If the presiding officer determines that the interests of justice would be served, he/she may authorize the taking of depositions provided that all parties are afforded an

opportunity to participate in the taking of the depositions. The party who requested the deposition shall arrange for a transcript to be made of the proceedings and shall upon request, and at his/her expense, furnish all other parties with copies of the transcript.

(12) Official notice may be taken of a public document, or part thereof, such as a statute, official report, decision, opinion or published scientific data issued by any agency of the Federal Government or a State or local government and such document or data may be entered on the record without further proof of authenticity. Official notice may also be taken of such matters as may be judicially noticed in the courts of the United States, State of California, or any other matter of established fact within the general knowledge of the Department. If the decision of the presiding officer rests on official notice of a material fact not appearing in evidence, a party shall on timely request be afforded an opportunity to show the contrary.

(13) After the hearing has concluded, but before the presiding officer makes his/her decision, he/she shall afford each participant a reasonable opportunity to submit proposed findings of fact and conclusions. After considering each proposed finding or conclusion the presiding officer shall state in his/her decision whether he/she has accepted or rejected them in accordance with the provisions of paragraph(h) and (i) of this section.

(h) Decision.

(1) Each decision of a presiding officer shall set forth his/her findings of fact, and conclusions, and shall state whether he/she has accepted or rejected each proposed finding of fact and conclusion committed by the parties, pursuant to subparagraph (g)(13) of this section. Findings of fact shall be based only upon evidence submitted to the presiding officer and matters of which official notice has been taken. The decision shall also specify the requirement or requirements with which it is found that the grantee has failed to comply.

(2) The decision of the presiding officer may provide for continued suspension or termination of the contract in whole or in part, and may contain such terms, conditions, and other provisions as are consistent with and will effectuate the purposes of the Community Services Block Grant Act, as amended.

(3) If the hearing is held by an independent hearing examiner rather than by the responsible Department official, he/she shall make an initial decision, and a copy of this initial decision shall be mailed to all parties. Any party may, within 20 days of the mailing of such initial decision or such longer period of time as the presiding officer specifies, file with the responsible Department official his/her exceptions to the initial decision and any supporting brief or statement. Upon the filing of such exceptions, the responsible Department official shall, within 20 days of the mailing of the exceptions, review the initial decision and issue his/her own decision thereon, including the reasons therefor. The decision of the responsible Department official may increase, modify, approve, vacate, remit, or mitigate any sanction imposed in the initial decision or may remand the matter to the presiding officer for further hearing or consideration.

(4) Whenever a hearing is waived, a decision shall be made by the responsible Department official and a written copy of the final decision of the reasonable Department official shall be given to the grantee.

(5) The grantee may request the Director to review a final decision made by the responsible Department official which provides for termination. Such a request must be made in writing within 15 days after the grantee has been notified of the decision in question and must state in detail the reasons for seeking the review. In the event the grantee requests such a review, the Director or his/her designee shall consider the reasons stated by the grantee for seeking the review and shall approve, modify, vacate or mitigate any sanction imposed by the responsible Department official or remand the matter to the responsible Department official for further hearing or consideration. The decision of the responsible Department official will be given great weight by the Director or his/her designee during the review. During the course of his/her review, the Director or his/her designee may, but is not required to, hold a hearing or allow the filing of briefs and arguments. Pending the decision of the Director or his/her designee, the grant shall remain suspended under the terms and the conditions specified by the responsible Department official unless the responsible Department official or the Director or his/her designee determines otherwise. Every reasonable effort shall be made to complete the review by the Director or his/her designee within 30 days of receipt of the grantee's request by the Director. The Director or his/her designee may, however, extend this period of time if he/she determines that additional time is necessary for an adequate review.

(6) The responsible Department official or the presiding officer of a termination hearing may alter, eliminate or modify any of the provisions of this section with the consent of the grantee and, in the case of a termination hearing, with the consent of all delegate agencies that have a right to participate in the hearing pursuant the subparagraph (e)(5) of this section. Such consent must be in writing or be recorded in the hearing transcript.

(7) The procedures established by this section shall not preclude the Department from pursuing other remedies authorized by law.

(i) Right to Counsel; Travel Expenses.

(1) The Department and the grantee shall have the right to be represented by counsel or other authorized representatives in all proceedings under this section. Any grantee or delegate agency if authorized by resolution of their Board of Directors, may transfer sufficient funds from their current operating grants to pay for fees, travel and per diem expenses of such attorney. The fees for such attorneys shall be the reasonable and customary fees for an attorney practicing in the locality of the attorney. However, such fees shall not exceed \$100 per day, exclusive of travel costs and per diem, without the prior written approval of the Department.

(2) The Board of Directors of the grantee or any delegate agency which has a right to participate in an informal meeting pursuant to subparagraph (e)(8) of this section will also be authorized to designate two persons in addition to an attorney whose travel and

per diem expenses to attend the meeting or hearing may be paid from the organization's current operating grant. Such travel and per diem expenses shall conform to the policies set forth in Office of Management and Budget (OMB) Circular A-110, dated 7/30/76, and OMB Circular A-102, dated 9/12/77, and other applicable Federal laws or regulations which may supersede these policies.

(j) Denial of Refunding.

(1) No grantee shall be denied refunding by the Department without the Department first complying with paragraphs (e), (f), (g), (h) and (i) of this section.

(2) In addition to the general requirements of subsection (a), the Department shall obtain authority to terminate the contract of community action agency grantees or migrant and seasonal farmworker organization grantees from the Secretary of the U.S. Department of Health and Human Services pursuant to Section 676 A of the Community Services Block Grant Act, (42 U.S.C. 9905A), prior to a denial of refunding.

(k) Disposition of Unexpended Funds.

Upon termination, the disposition of unexpended CSBG funds and of property purchased with program funds shall be in accordance with the provisions of Section 100740 of Article 3 of these regulations, entitled Grant Closeouts for Terminated Grantees. Termination shall not affect expenditures or legally binding commitments made prior to the grantees receipt of notice of the termination provided such expenditures were made in good faith and are otherwise allowable.

Note: Authority cited: Section 12781(d)(1) and (e), Government Code. Reference: Section 12781(d)(1), Government Code



LINNÉ K. STOUT
DIRECTOR

State of California-Health and Human Services Agency
DEPARTMENT OF COMMUNITY SERVICES AND DEVELOPMENT
2389 Gateway Oaks Drive, Suite 100, Sacramento, CA 95833
Telephone: (916) 576-7109 | Fax: (916) 263-1406
www.esd.cagov



EDMUND G. BROWN JR.
GOVERNOR

CSD PROGRAM NOTICE - CSBG

CPN-C-16-01

ISSUE DATE May 19, 2016

EXPIRATION DATE Until Rescinded or Revoked

FROM: 
Linné Stout, Director

SUBJECT Eligibility for Households Receiving CalWORKs Benefits

PURPOSE The purpose of this Notice is to provide local agencies with guidance on client eligibility for Community Services Block Grant (CSBG)-funded services, when receiving benefits under the Temporary Assistance to Needy Families (TANF) program, known as California Work Opportunity and Responsibility to Kids (CalWORKs) program in California (hereinafter TANF/CalWORKs).

SCOPE This Notice applies to all CSBG eligible entities and organizations designated to receive CSBG funds.

REFERENCE CSBG Act, 42 USC §§9901(1), 9902(2)
CA Gov. Code §12730(h)
45 CFR §96.30 (a)

EFFECTIVE DATE Upon Issuance

GENERAL

Background Agencies have requested guidance on the issue of eligibility for applicants/households that apply for CSBG-funded services and receive TANF/CalWORKs assistance, but have a monthly income exceeding 100% of the Federal Poverty Level (FPL). Federal law states that individuals/households must not exceed 100% of the FPL to be eligible for CSBG services. According to State law, however, TANF/CalWORKs participants are automatically eligible to receive CSBG-funded services,

despite the potential to exceed the income eligibility criteria. This Program Notice resolves the conflict between Federal and State law and ensures both purposes are not overlooked.

TANF/CalWORKs is a program that provides cash aid and education, employment, and training programs to California families with low or very low incomes who are either under-employed, unemployed, or about to become unemployed to move toward self-sufficiency. One of the CSBG Act's key purposes [42 USC §9901(1)] is to support activities that help remove obstacles to self-sufficiency, particularly for families "attempting to transition off" of TANF, also known as CalWORKs in California.

Analysis

Federal Law states that the poverty line (100 percent of the FPL) "shall be used as criterion of eligibility in the community services block grant program." (42 USC §9902 (2)). The Federal law does provide some flexibility to states when determining the eligibility levels for CSBG-funded programs. "Whenever a State determines that it serves the objectives of the block grant program... the State may revise the poverty line to not to exceed 125 percent of the official poverty line otherwise applicable under this paragraph." (42 USC §9902 (2)).

State CSBG law considers (without using the terminology 'categorical eligibility') CalWORKs recipients as automatically eligible for CSBG-funded services:

(h) "Eligible beneficiaries" means all of the following:

- (1) All individuals living in households with incomes not to exceed the official poverty line according to the poverty guidelines updated periodically in the Federal Register by the United States Department of Health and Human Services, as defined in Section 9902 of Title 42 of the United States Code, as amended.
- (2) All individuals eligible to receive Temporary Assistance for Needy Families under the state's plan approved under Public Law 104-193, the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, and (Chapter 2 (commencing with Section 11200) of Part 3 of Division 9 of the Welfare and Institutions Code) or assistance under Part A of Title IV of the Social Security Act (42 U.S.C. Sec. 601 et seq.).
- (3) Residents of a target area or members of a target group having a measurably high incidence of poverty and that is the specific focus of a project financed under this chapter.

[Cal. Gov. Code §12730(h)]

For the purpose of determining CSBG household eligibility, "household" is defined in accordance with the United States Department of Health

and Human Services poverty guidelines. The poverty guidelines provide the official poverty measure for persons in families/households of 1 or more persons. Using this measure, the CSBG household is defined as 1 or more persons.

This language creates a potential conflict between Federal and State CSBG laws, as Federal law does not provide categorical eligibility for CSBG-funded services to TANF/CalWORKs participants, who may exceed 100 percent of the FPL, as provided in California's CSBG law. Federal statute, however, does grant authority to increase the eligibility level for CSBG-funded programs to 125 percent of the FPL (42 U.S.C. § 9902(2)).

To resolve potential conflicts between state and federal laws, CSD must take legal and policy implications into account when creating guidelines. If there is a conflict between federal and state law, CSD is required to adhere to federal law, as it is considered the "supreme law of the land" and supersedes state law. Therefore, the foundational rule in this case must be that CSBG applicants' income shall not exceed 100% of the FPL. While this initial rule resolves potential federal challenges, it does not fully capture State law, TANF/CalWORKs and CSBG programs' mission: to reduce poverty and assist applicants gain self-sufficiency.

Both the Federal and State CSBG statutes make an explicit connection between CSBG and TANF or CalWORKs and the purpose of self-sufficiency by providing resources to those individuals moving away from poverty. This purpose seems to be defeated if a family that receives CalWORKs is unable to receive CSBG-funded services, some of which provide opportunities for CalWORKs recipients to fulfill/comply with the program's work participation requirements. CSD has the authority to allow CalWORKs participants to participate in CSBG-funded programs if the household income does not exceed 125 percent of the FPL, in accordance with the Federal statute's flexibility to states.

Conclusion

To accomplish the purpose of the CSBG and CalWORKs programs, and to comply with both state and federal law, agencies administering CSBG shall consider an applicant/household who does not receive CalWORKs and does not exceed 100% of the FPL eligible for CSBG-funded programs. An applicant/household who receives CalWORKs and exceeds 100% of the federal poverty level, but does not exceed 125% of the FPL is also eligible for CSBG services.

The increase in income eligibility for CSBG applicants is limited to participants of the CalWORKS program. Participants in other federally or state funded programs such as SSI, CalFresh, or Head Start, must qualify at the 100% FPL to be eligible for CSBG-funded programs.

GLOSSARY OF TERMS

ACF: Administration for Children and Families

ASU: Audit Services Unit

CAA: Community Action Agency

CAC: CSBG Advisory Committee

CalCAPA: California Community Action Partnership Association

CalEITC: California Earned Income Tax Credit

CAP: Community Action Plan

CCEDA: California Community Economic Development Association

CDC: Community Design Center

CSD: Community Services and Development

CSBG: Community Services Block Grant

EITC: Earned Income Tax Credit

EMT: Emergency Medical Technician

FI\$CAL: Financial Information System for California

FFY: Federal Fiscal Year

FPL: Federal Poverty Level

FTB: Franchise Tax Board

HiAP: Health in All Policies

LACCD: Los Angeles Community College District

LIHEAP: Low-Income Home Energy Assistance Program

LIWP: Low-Income Weatherization Program

LPA: Limited Purpose Agency

NAI: Native American Indian

MSFW: Migrant & Seasonal Farmworker Program

OCS: Office of Community Services

QIP: Quality Improvement Plan

RCAC: Rural Community Assistance Corporation

ROMA: Results Oriented Management and Accountability

RPIC: Regional Performance & Innovation Consortia

SCO: State Controller's Office

SIT: State Interagency Team

SNAP: Supplemental Nutrition Assistance Program

T&TA: Training and Technical Assistance

WAP: Weatherization Assistance Program