

CSBG State Plan

Program Name: Community Services Block Grant

Grantee Name: Michigan

Report Name: CSBG State Plan

Report Period: 10/01/2020 to 09/30/2021

Report Status: Saved -- Validated

Report Sections

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CSBG Cover Page (SF-424M)

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration for Children and Families Community Services Block Grant (CSBG)	Form Approved OMB No: 0970-0382 Expires:06/30/2021
COVER PAGE	

* 1.a. Type of Submission: <input type="radio"/> Application <input checked="" type="radio"/> Plan <input type="radio"/> Other (2 Year)	* 1.b. Frequency: <input type="radio"/> Annual <input checked="" type="radio"/> Other (2 Year)	* 1.c. Consolidated Application/ Plan/Funding Request? Explanation:	* 1.d. Version: <input checked="" type="radio"/> Initial <input type="radio"/> Resubmission <input type="radio"/> Revision <input type="radio"/> Update
		2. Date Received:	State Use Only:
		3. Applicant Identifier:	
		4a. Federal Entity Identifier:	5. Date Received By State:
		4b. Federal Award Identifier:	6. State Application Identifier:

7. APPLICANT INFORMATION

* a. Legal Name: Michigan Department of Health and Human Services			
* b. Employer/Taxpayer Identification Number (EIN/TIN): 1386000134F1		* c. Organizational DUNS: 113704139	
* d. Address:			
* Street 1:	333 S. Grand Avenue	Street 2:	P.O. Box 30195
* City:	Lansing	County:	Ingham
* State:	MI	Province:	
* Country:	United States	* Zip / Postal Code:	48909 -769

e. Organizational Unit:

Department Name: Michigan Department of Health and Human Services	Division Name:
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f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Mrs.	* First Name: September	Middle Name:	* Last Name: Ward
Suffix:	Title: CSBG Specialist	Organizational Affiliation:	
* Telephone Number: (517) 614-7249	Fax Number:	* Email: wards1@michigan.gov	

*** 8a. TYPE OF APPLICANT:**
A: State Government

b. Additional Description:

*** 9. Name of Federal Agency:**

	Catalog of Federal Domestic Assistance Number:	CFDA Title:
10. CFDA Numbers and Titles	93569	Community Services Block Grant

11. Descriptive Title of Applicant's Project
FY21-22 CSBG State Plan Application

12. Areas Affected by Funding:
State of Michigan

13. CONGRESSIONAL DISTRICTS OF:

* a. Applicant 8	b. Program/Project: Statewide
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Attach an additional list of Program/Project Congressional Districts if needed.

14. FUNDING PERIOD:	15. ESTIMATED FUNDING:
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a. Start Date:	b. End Date:	* a. Federal (\$): \$0	b. Match (\$): \$0
* 16. IS SUBMISSION SUBJECT TO REVIEW BY STATE UNDER EXECUTIVE ORDER 12372 PROCESS?			
a. This submission was made available to the State under the Executive Order 12372			
Process for Review on :			
b. Program is subject to E.O. 12372 but has not been selected by State for review.			
c. Program is not covered by E.O. 12372.			
* 17. Is The Applicant Delinquent On Any Federal Debt?			
<input type="radio"/> YES <input checked="" type="radio"/> NO			
Explanation:			
18. By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001) **I Agree <input checked="" type="checkbox"/>			
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.			
18a. Typed or Printed Name and Title of Authorized Certifying Official		18c. Telephone (area code, number and extension)	
		18d. Email Address	
18b. Signature of Authorized Certifying Official		18e. Date Report Submitted (Month, Day, Year)	
Attach supporting documents as specified in agency instructions.			

Section 1: CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration for Children and Families Community Services Block Grant (CSBG)	Form Approved OMB No:0970-0382 Expires:06/30/2021
SECTION 1 CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter	

1.1. Identify whether this is a One-Year or a Two-Year Plan	<input type="radio"/> one-year <input checked="" type="radio"/> two-year
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1.1a. Provide the federal fiscal years this plan covers:	Year One 2021	Year Two 2022
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1.2. Lead Agency: Update the following information in relation to the lead agency designated to administer CSBG in the state, as required by Section 676(a) of the CSBG Act.

Information should reflect the responses provided in the Application for Federal Assistance, SF-424M.

Has information in regards to the state lead agency has changed since the last submission of the state plan? <input checked="" type="radio"/> Yes <input type="radio"/> No
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If yes, provide the date of change and select the fields that have been updated 01/14/2019

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

1.2a. Lead agency	Michigan Department of Health and Human Services
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1.2b. Cabinet or administrative department of this lead agency <i>[Select one option and narrative where applicable]</i>
<input type="radio"/> Community Services Department
<input checked="" type="radio"/> Human Services Department
<input type="radio"/> Social Services Department
<input type="radio"/> Governor's Office
<input type="radio"/> Community Affairs Department
<input type="radio"/> Health Department
<input type="radio"/> Housing Department
<input type="radio"/> Other, describe

1.2c. Cabinet or Administrative Department Name: Provide the name of the cabinet or administrative department of the CSBG authorized official	
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1.2d. Authorized official of the lead agency	
Name: Robert Gordon	Title: Director

1.2e. Street Address	333 S. Grand Avenue; P.O. Box 30195
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1.2f. City	Lansing	1.2g. State MI	1.2h. Zip 48909
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1.2i. Telephone number and extension 517 284 - 4985 ext.	1.2j. Fax number 517 284 - 4993
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1.2k. Email address MDHHS-Grants@michigan.gov	1.2l. Lead agency website www.michigan.gov/mdhhs
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1.3. Designation Letter:

Attach the state's official CSBG designation letter. A new designation letter is required if the chief executive officer of the state and/or the designated agency has changed.

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

Has Information in regards to the state point of contact has changed since the last submission of the state plan? Yes No

If yes, provide the date of change and select the fields that have been updated Date picker and check all the apply 10/01/2020

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

1.4a. Agency Name Bureau of Community Action and Economic Opportunity

1.4b Point of Contact Name

Name: September Ward

Title: CSBG Specialist

1.4c. Street Address

235 S. Grand Avenue; Suite 1105

1.4d. City

Lansing

1.4e. State MI

1.4f. Zip 48909

1.4g. Telephone Number 517 614 - 7249 ext.

1.4h. Fax Number -

1.4i. Email Address mdhhs-bcaeo@michigan.gov

1.4j. Agency Website www.michigan.gov/BCAEO

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

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

Has Information in regards to the state Community Action Association has changed since the last submission of the state plan? Yes No

If yes, provide the date of change and select the fields that have been updated Date picker and check all the apply 01/16/2020

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

1.5a. Agency Name Michigan Community Action Agency Association

1.5b. Executive Director or Point of Contact

Name: Chong-Anna Canfora

Title: Executive Director

1.5c. Street Address

2173 Commons Parkway

1.5d. City

Okemos

1.5e. State MI

1.5f. Zip 48864

1.5g. Telephone number 517 679 - 6400 ext.

1.5h. Fax number -

1.5i. Email Address ccanfora@micommunityaction.org

1.5j. State Association Website https://mcaac.memberclicks.net/

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

Section 2: State Legislation and Regulation

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

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SECTION 2 State Legislation and Regulation

2.1. CSBG State Legislation:

State has a statute authorizing CSBG Yes No

2.2. CSBG State Regulation:

State has regulations for CSBG Yes No

2.3. Legislation/Regulation Document: Attach the legislation and/or regulations or provide a hyperlink(s) to the documents indicated under Item 2.1. and/or Item 2.2.

https://www.michigan.gov/mdhhs/0,5885,7-339-73970_5093_28508_76839---,00.html

2.4. State Authority:

Select a response for each of the following items about the state statute and/or regulations authorizing CSBG:

2.4a. Authorizing Legislation: State legislature enacts authorizing legislation or amendments to an existing authorizing statute, last federal fiscal year Yes No

2.4b. Regulation Amendments: State established or amended regulations for CSBG last federal fiscal year Yes No

2.4c. Designation: State statutory or regulatory authority designates the bureau, division, or office in the state government that is to be the state administering agency Yes No

Section 3: State Plan Development and Statewide Goals

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
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SECTION 3 State Plan Development and Statewide Goals

3.1. CSBG Lead Agency Mission and Responsibilities:

Briefly describe the mission and responsibilities of the state agency that serves as the CSBG Lead Agency.

The Michigan Department of Health and Human Services provides opportunities, services, and programs that promote a healthy, safe, and stable environment for residents to be self-sufficient.

3.2. State Plan Goals:

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

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

1. Create a data solution for enhanced intake and reporting. 2. Increase the linkages and coordination at the state level to ensure increased access to CSBG services by communities and people with low-income.

3.3. State Plan Development:

Indicate the information and input the state accessed to develop this State Plan.

3.3a. Analysis of state-level tools [Check all that apply and narrative where applicable]

State Performance Indicators and/or National Performance Indicators (NPIs)

U.S. Census data

State performance management data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)

Monitoring Visits/Assessments

Tools not identified above (specify)

3.3b. Analysis of local-level tools [Check all that apply and narrative where applicable]

Eligible entity community needs assessments

Eligible entity community action plans

Public Hearings/Workshops

Tools not identified above (e.g., State required reports)[specify]

We hold CSBG Advisory Group meetings to gather feedback from the CAA network. We started weekly Community Action Agency Feedback meetings when the pandemic started to keep communication open between the state and the CAAs.

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

Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)

State Association

National Association for State Community Services Programs (NASCSPP)

Community Action Partnership (The Partnership)

Community Action Program Legal Services (CAPLAW)

CSBG Tribal Training and Technical Assistance (T/TA) provider

Regional Performance Innovation Consortium (RPIC)

Association for Nationally Certified ROMA Trainers (ANCRT)

Federal CSBG Office

Organizations not identified above [Specify]

3.4. Eligible Entity Involvement

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

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

The state plan is discussed at CSBG Advisory group meetings as well as at Director's Council and during our ROMA Collaboration meetings. Discussions are also held with our State Association. Networking between the state and our state association was done during the NASCSP winter conference as well. Suggestions have been incorporated into the FY21-22 State Plan. The CSBG public hearing was held virtually to collect feedback from the CAAs on the state plan development.

3.4b. Performance Management Adjustment: Describe how the state adjusted its State Plan development procedures under this State Plan, as compared to previous plans in order to:

- 1) encourage eligible entity participation and
- 2) ensure the State Plan reflects input from eligible entities?

Any adjustment should be based on the State's analysis of past performance in these areas, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing.

If the State is not making any adjustments, provide further detail.

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

One of the CSBG Advisory Committee's duties is to review and participate in the state plan creation. Our eligible entities are aware of this when they volunteer for the committee. The state plan is reviewed, comments are made, and updates are made to the plan for final review from the Advisory Committee. The committee is made up of CAA staff, state staff and state association staff. The draft state plan is sent to all CAAs for review and input before the final is submitted.

3.5. Eligible Entity Overall Satisfaction:

Provide the State's target for eligible entity Overall Satisfaction during the performance period:

Year One	80	Year Two	81
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Instructional Note: The state's target score will indicate improvement or maintenance of the state's Overall Satisfaction score from the most recent American Customer Survey Index (ACSI) survey of the state's eligible entities.

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

Section 4: CSBG Hearing Requirements

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration for Children and Families Community Services Block Grant (CSBG)	Form Approved OMB No: 0970-0382 Expires:06/30/2021
SECTION 4 CSBG Hearing Requirements	

4.1. Public Inspection:
Describe the steps taken by the state to disseminate this State Plan to the public for review and comments prior to the public hearing, as required under Section 676(e)(2) of the Act.

The state has a CSBG Advisory Committee that reviews the CSBG state plan for input and review. We break it down by section and speak to each section to get input and approval. We also send the draft state plan to the CAA network and state association for review. The state also posted the draft plan on the state website. No comments were made.

4.2. Public Notice/Hearing:
Describe how the state ensured there was sufficient time and statewide distribution of notice of the public hearing(s) to allow the public to comment on the State Plan, as required under Section 676(a)(2)(B) of the CSBG Act.

Due to the pandemic, the state held a virtual public hearing on August 11, 2020 to gather input and receive public comment. No comments were made. Only state staff attended the virtual hearing. The public hearing notice was sent to the State Association and also made available on the State website and the State Association website. It was also discussed during the leadership meetings that BCAEO held with all CAAs. The Notice of Public Hearing was published on the state website in August indicating that the FY2021-22 CSBG State Plan would be available on the MDHHS/BCAEO website and that written comments could be submitted through August 20, 2020. The notice was also posted on the state association's website. The public hearing was held virtually on August 11, 2020 from 10:00 am to 11:00 am.

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

	Date	Location	Type of Hearing [Select an option]	If a combined hearing was held, confirm that the public was invited
1	09/23/2020	Lansing, MI	Legislative	<input type="checkbox"/>
2	08/11/2020	Lansing, MI	Public	<input type="checkbox"/>

4.4. Attach supporting documentation or a hyperlink for the public and legislative hearings.
 The CSBG State public hearing notice can be found at: House Bill 5396 Conference Report was adopted by the House and by the Senate on September 23, 2020. CSBG is on page 136. See attachment for 4.4.

Section 5: CSBG Eligible Entities

**U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)**

**Form Approved
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SECTION 5 CSBG Eligible Entities

5.1. CSBG Eligible Entities:

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

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

Types of Entities include Community Action Agency, Limited Purpose Agency, Local Government Agency, Migrant or Seasonal Farmworker Organization, Tribe or Tribal Organization, and Other

#	CSBG Eligible Entity	Geographical Area Served by county (Provide all counties)	Public or Nonprofit	Type of Entity [choose all that apply]
1	Allegan County Resource Development Committee Inc	Allegan county	Non-Profit	Community Action Agency
2	Kent, County of (Inc)	Kent county	Public	Community Action Agency
3	Baraga-Houghton-Keweenaw Community Action Agency, Inc	Baraga, Houghton, Keweenaw counties	Non-Profit	Community Action Agency
4	Blue Water Community Action	St. Clair county	Non-Profit	Community Action Agency
5	Capital Area Community Services Incorporated	Eaton, Clinton, Shiawassee, Ingham counties	Non-Profit	Community Action Agency
6	Chippewa Luce Mackinac Community Action Human Resource Authority, Incorporated	Chippewa, Luce, Mackinac counties	Non-Profit	Community Action Agency
7	Community Action Agency of South Central Michigan, The	Barry, Branch, Calhoun, St. Joseph, Kalamazoo counties	Non-Profit	Community Action Agency
8	Dickinson Iron Community Services Agency	Dickinson, Iron counties	Non-Profit	Community Action Agency
9	EightCAP Inc	Montcalm, Ionia, Isabella, Gratiot counties	Non-Profit	Community Action Agency
10	Alger Marquette Community Action Board	Alger, Marquette counties	Non-Profit	Community Action Agency
11	Community Action Agency	Jackson, Lenawee, Hillsdale counties	Non-Profit	Community Action Agency
12	FiveCAP Inc	Manistee, Mason, Lake, Newaygo counties	Non-Profit	Community Action Agency
13	Genesee, County of	Genesee county	Public	Community Action Agency
14	Gogebic-Ontonagon Community Action	Gogebic, Ontonagon counties	Non-Profit	Community Action Agency
15	Human Development Commission Inc	Sanilac, Tuscola, Huron, Lapeer counties	Non-Profit	Community Action Agency
16	Macomb, County of	Macomb county	Public	Community Action Agency
17	Human Resources Authority Inc	Menominee, Delta, Schoolcraft counties	Non-Profit	Community Action Agency
18	Mid Michigan Community Action Agency Inc	Gladwin, Mecosta, Osceola, Clare, Bay, Midland counties	Non-Profit	Community Action Agency
19	Monroe County Opportunity Program, Inc	Monroe county	Non-Profit	Community Action Agency
20	Northeast Michigan Community Service Agency Inc	Alpena, Cheboygan, Otsego Crawford, Oscoda, Alcona, Ogemaw, Iosco, Arenac, Presque Isle, Montmorency counties	Non-Profit	Community Action Agency
21	Northwest Michigan Community Action Agency Inc	Emmet, Charlevoix, Antrim, Kalkaska, Missaukee, Wexford, Roscommon, Grand Traverse, Benzie, Leelanau counties	Non-Profit	Community Action Agency
22	Oakland Livingston Human Services	Oakland, Livingston counties	Non-Profit	Community Action Agency

	Agency			
23	Ottawa, County of	Ottawa county	Public	Community Action Agency
24	Saginaw County Community Action Committee	Saginaw county	Non-Profit	Community Action Agency
25	Southwest Michigan Community Action Agency	Cass, Berrien, Van Buren counties	Non-Profit	Community Action Agency
26	Washtenaw, County of	Washtenaw county	Public	Community Action Agency
27	Wayne Metropolitan Community Action Agency	Wayne county	Non-Profit	Community Action Agency
28	Muskegon Oceana CAP Inc	Muskegon, Oceana counties	Non-Profit	Community Action Agency

5.2. Total number of CSBG eligible entities 28

5.3. Changes to Eligible Entities List:

Within the tables below, describe any changes that have occurred to the Eligible Entities within the state since the last federal fiscal Year (FFY), as applicable.

One or more of the following changes were made to the eligible entity list: [Check all that apply].

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

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

CSBG Eligible Entity	Type	Start Date	Geographical Area Served	Delete

5.3b. Designation and Voluntary Relinquishments: Identify any entities that are no longer receiving CSBG funding. Include any eligible entities that have been terminated (de-designated) as defined under Section 676(c) and Section 676C of the Act, or voluntarily relinquished their CSBG eligible entity status since the last Federal Fiscal Year (FFY). Include any eligible entities designated to serve an area previously not served by CSBG as well as any entities designated to replace another eligible entity that was terminated (de-designated)

CSBG Eligible Entity	Reason	Delete

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

Original CSBG Eligible Entities	Surviving CSBG Eligible Entity	New Name (as applicable)	DUNS No.	Delete

Section 6: Organizational Standards for Eligible Entities

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration for Children and Families Community Services Block Grant (CSBG)	Form Approved OMB No: 0970-0382 Expires:06/30/2021
<h3 style="margin: 0;">SECTION 6</h3> <h2 style="margin: 0;">Organizational Standards for Eligible Entities</h2>	
Note: Reference IM 138, <i>State Establishment of Organizational Standards for CSBG Eligible Entities</i> , for more information on Organizational Standards. Click HERE for IM 138.	
6.1. Choice of Standards: Confirm whether the state will implement the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138) or an alternative set during the federal fiscal year(s) of this planning period	
<input checked="" type="radio"/> COE CSBG Organizational Standards <input type="radio"/> Modified version of COE CSBG Organizational Standards <input type="radio"/> Alternative set of Organizational Standards	
6.1a. Modified Organizational Standards: In the case that the state is requesting to use modified COE-developed organizational standards, provide the proposed modification for the FFY of this planning period including the rationale.	
N/A	
6.1b. Alternative Organizational Standards: If using an alternative set of organizational standards, attach the complete list of alternative organizational standards.	
6.1c. Alternative Organizational Standards Changes: If using an alternative set of organizational standards:	
1) provide any changes from the last set provided during the previous State Plan submission; 2) describe the reasons for using alternative standards; and 3) describe how they are at least as rigorous as the COE- developed standards	
<input type="radio"/> There were no changes from the previous State Plan submission	
Provide reason for using alternative standards	
N/A	
Describe rigor compared to COE-developed Standards	
N/A	
6.2. Implementation: Check the box that best describes how the state officially adopt(ed) organizational standards for eligible entities in the state in a manner consistent with the state's administrative procedures act. If "Other" is selected, provide a timeline and additional information, as necessary. <i>[Check all that apply and narrative where applicable]</i>	
<input type="checkbox"/> Regulation	
<input checked="" type="checkbox"/> Policy	
<input checked="" type="checkbox"/> Contracts with eligible entities	
<input type="checkbox"/> Other, describe:	
N/A	
6.3. Organizational Standards Assessment: Describe how the state assess eligible entities against organizational standards this federal fiscal year(s). <i>[Check all that apply.]</i>	
<input type="checkbox"/> Peer-to-peer review (<i>with validation by the State or state-authorized third party</i>)	
<input type="checkbox"/> Self-assessment (<i>with validation by the State or state-authorized third party</i>)	
<input type="checkbox"/> Self-assessment/peer review with state risk analysis	
<input type="checkbox"/> State-authorized third party validation	
<input checked="" type="checkbox"/> Regular, on-site CSBG monitoring	
<input checked="" type="checkbox"/> Other desk review monitoring	
6.3a. Assessment Process: Describe the planned assessment process.	
Our process over the last few years has included the state conducting an assessment of the organizational standards through both onsite and desk review monitorings. Each grant manager conducts five to six organizational standards reviews by using an electronic automated tool. Assessment Steps: 1. BCAEO notifies the agency about the organizational standards review. 2. Agency receives instructions on uploading documents by Org Standard into the statewide database. 3. BCAEO conducts an entrance conference to provide the agency with the scope of the review. 4. BCAEO reviews each document for the components listed in the organizational standards monitoring tool to ensure the organization standard has been met. a.) Met standards are marked met b.)Standards that have not been met and do not contain the required components are marked not met. c.) Standards that are being worked on are marked in-progress in the monitors field notes d.) Notes are stored in the custom database. 5. Standards that were met are indicated in the	

monitoring report. 6. Standards that were not met are indicated in the monitoring report. A Corrective Action Plan (CAP) will be required. Agencies that cannot correct the finding within 30 days will be placed on a Technical Assistance Plan. Failure to comply with the TAP will require additional monitoring to determine the causes of the failure. This may lead to a Quality Improvement Plan. 7. Standards that are in-progress will be identified in the monitoring report as not met.

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

6.4a. Provide the specific eligible entities the state will exempt from meeting organizational standards, and provide a description and a justification for each exemption

Total Number of Exempt Entities: 0

CSBG Eligible Entity	Description / Justification	Delete

6.5. Performance Target: Provide the percentage of eligible entities that the state expects to meet all the state-adopted organizational standards for FFY(S) for this planning period

Year One	90%	Year Two	90%
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Note: Item 6.5 is associated with State Accountability Measures 6Sa and prepopulate the Annual report, Module 1, Table D.2.

Section 7: State Use of Funds

**U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
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**Form Approved
OMB No: 0970-0382
Expires:06/30/2021**

SECTION 7 State Use of Funds

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

7.1. Formula:

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

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

7.1a. Formula Description: Describe the current practice for allocating CSBG funds to eligible entities.

(a) A base allocation of \$25,000 for each Community Action Agency (CAA). (b) Remaining Funds: 84 percent: Based on each CAA's relative share of the number of persons with income below 125% of the poverty level. 10 percent: Based on each CAA's relative share of the excess number of persons with income below 125% of the poverty level. Excess poverty is defined as the number of persons with income below 125% of the poverty level in excess of the statewide average of 14 percent. 6 percent: Based on each CAA's relative share of the extreme poverty level. Extreme poverty is defined as the number of persons with income 125% of the poverty level in excess of 25 percent.

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

7.2. Planned Allocation:

Specify the percentage of your CSBG planned allocation that will be funded to eligible entities and "not less than of 90 percent funds" as described under Section 675C(a) of the CSBG Act.

In the table, provide the planned allocation for each eligible entity receiving funds for the fiscal year(s) covered by this plan.

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

Year One	90.00%	Year Two	90.00%
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Planned CSBG 90 Percent Funds

CSBG Eligible Entity	Year One Funding Amount \$	Delete
Allegan County Resource Development Committee Inc	\$223,736	
Kent, County of (Inc)	\$1,197,544	
Baraga-Houghton-Keweenaw Community Action Agency, Inc	\$180,024	
Blue Water Community Action	\$303,231	
Capital Area Community Services Incorporated	\$1,171,330	
Chippewa Luce Mackinac Community Action Human Resource Authority, Incorporated	\$157,302	
Community Action Agency of South Central Michigan, The	\$1,320,666	
Dickinson Iron Community Services Agency	\$84,668	
EightCAP Inc	\$832,517	
Alger Marquette Community Action Board	\$144,242	
Community Action Agency	\$631,193	
FiveCAP Inc	\$311,388	
Genesee, County of	\$1,213,608	
Gogebic-Ontonagon Community Action	\$90,512	
Human Development Commission Inc	\$454,720	
Macomb, County of	\$1,197,544	
Human Resources Authority Inc	\$165,677	

Mid Michigan Community Action Agency Inc	\$752,711
Monroe County Opportunity Program, Inc	\$223,736
Northeast Michigan Community Service Agency Inc	\$529,889
Northwest Michigan Community Action Agency Inc	\$610,605
Oakland Livingston Human Services Agency	\$1,654,637
Ottawa, County of	\$362,852
Saginaw County Community Action Committee	\$587,660
Southwest Michigan Community Action Agency	\$678,653
Washtenaw, County of	\$601,335
Wayne Metropolitan Community Action Agency	\$8,079,215
Muskegon Oceana CAP Inc	\$597,880
Total	\$24,359,075

CSBG Eligible Entity Year Two		
CSBG Eligible Entity	Year Two Funding Amount \$	Delete
Allegan County Resource Development Committee Inc	\$223,736	
Kent, County of (Inc)	\$1,197,544	
Baraga-Houghton-Keweenaw Community Action Agency, Inc	\$180,024	
Blue Water Community Action	\$303,231	
Capital Area Community Services Incorporated	\$1,171,330	
Chippewa Luce Mackinac Community Action Human Resource Authority, Incorporated	\$157,302	
Community Action Agency of South Central Michigan, The	\$1,320,666	
Dickinson Iron Community Services Agency	\$84,668	
EightCAP Inc	\$832,517	
Alger Marquette Community Action Board	\$144,242	
Community Action Agency	\$631,193	
FiveCAP Inc	\$311,388	
Genesee, County of	\$1,213,608	
Gogebic-Ontonagon Community Action	\$90,512	
Human Development Commission Inc	\$454,720	
Macomb, County of	\$1,197,544	
Human Resources Authority Inc	\$165,677	
Mid Michigan Community Action Agency Inc	\$752,711	
Monroe County Opportunity Program, Inc	\$223,736	
Northeast Michigan Community Service Agency Inc	\$529,889	
Northwest Michigan Community Action Agency Inc	\$610,605	
Oakland Livingston Human Services Agency	\$1,654,637	
Ottawa, County of	\$362,852	
Saginaw County Community Action Committee	\$587,660	
Southwest Michigan Community Action Agency	\$678,653	
Washtenaw, County of	\$601,335	
Wayne Metropolitan Community Action Agency	\$8,079,215	
Muskegon Oceana CAP Inc	\$597,880	
Total	\$24,359,075	

7.3. Distribution Process:

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

All eligible entities (CAAs) requesting CSBG funds submit a Community Action Plan (CAP) in the format prescribed by the state (usually due within four weeks of receiving the request from MDHHS). While the CAA submits their CAP, the BCAEO approves it and sends it back to them and our Contracts area within MDHHS processes the Contracts in our EGRaMS system for MDHHS Executive approval (usually around 30 days). Planning allocation amounts, program requirements, plan criteria, and other pertinent data are distributed annually (prior to October 1) as a CSBG item update in the MDHHS Community Services Policy Manual. Since the state is not notified of its allotment until after the CAA plans are due, the CAA plans address

the expenditure of funds as identified in a "planned" allocation chart. The CAAs amend their plans during the second quarter of the year based on final allocations; This process is completed within 30 days from the date the amended plan package is sent to the agencies. All CAA plans must demonstrate a planning process that incorporates participation of the target client groups, other social service agencies and coordination with local governments. Programs are reviewed for consistency with the proposed expenditure plan. CAAs are given the option of conducting at least one local public hearing or providing for a public comment period to allow low income persons, community organizations, and other interested parties the opportunity to participate in formulating the agencies' CAPs. CAAs provide documentation in their plans that such a hearing or comment period was scheduled and maintain a record of all testimony and/or comments received. The annual CSBG Grant Agreements include general provisions that the CAA must abide by in order to receive funds. The provisions cover issues such as: audit requirements, insurance coverage, compliance with state and federal laws and regulations, confidentiality, termination, submission of board minutes, etc. It also includes the following assurances/documents: Governing Board Assurances; Certification Regarding Lobbying; and Certification Regarding Debarment, Suspension and other Responsibility Matters - Primary Covered Transactions. A signed Agreement must be on file prior to disbursing funds at the beginning of each CSBG program year (October 1).

7.4. Distribution Timeframe:

Does the state plan to make funds available to eligible entities no later than 30 calendar days after OCS distributes the federal award? Yes
 No

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

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

7.5. Performance Management Adjustment:

Describe the state's strategy for improving grant and/or contract administration procedures under this State Plan as compared to past plans. Any improvements should be based on analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any improvements, provide further detail.

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

The state improved contract administration procedures by streamlining required documents from the eligible entities, providing webinars and training on plan instructions prior to submission, meeting with the CSBG Advisory Committee to review the Community Action Plan and creating SharePoint to allow agencies to retrieve and submit their plan documents.

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

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

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

Year One (0.00%)	5.00	Year Two (0.00%)	5.00
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7.7. State Staff: Provide the number of state staff positions to be funded in whole or in part with CSBG funds for the FFY(s) covered by this State Plan

Year One	15.00	Year Two	15.00
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7.8. State FTEs: Provide the number of state Full Time Equivalents (FTEs) to be funded with CSBG funds for the FFY(s) covered by this State Plan

Year One	7.00	Year Two	7.00
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7.9. Remainder/Discretionary Funds Use: Does the state have remainder/discretionary funds, as described in Section 675C(b)(1) of the CSBG Act? Yes No

If yes, provide the allocated percentage and describe the use of the remainder/discretionary funds in the table below.

Year One (0.00%)	5.00%	Year Two (0.00%)	5.00%
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Use of Remainder/Discretionary Funds(See Section 675C(b)(1) of the CSBG Act)

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

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

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

Remainder/Discretionary Fund Uses	Year One Planned \$	Brief description of services/activities and/or activities
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7.9a. Training/technical assistance to eligible entities	\$100,000.00	These planned services/activities will be described in State Plan Item 8.1.
7.9b. Coordination of state-operated programs and/or local programs	\$200,000.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9c. Statewide coordination and communication among eligible entities	\$260,000.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need	\$232,601.00	Raise smaller agencies up to a minimum of \$175,000
7.9e. Asset-building programs	\$0.00	
7.9f. Innovative programs/activities by eligible entities or other neighborhood groups	\$470,681.00	Innovative programs by eligible entities or COVID19 needs
7.9g. State charity tax credits	\$0.00	
7.9h. Other activities, specify in column 3	\$90,000.00	Native American grants
Total	\$1,353,282.00	
Remainder/Discretionary Fund Uses	Year Two Planned \$	Brief description of services/activities
7.9a. Training/technical assistance to eligible entities	\$100,000.00	These planned services/activities will be described in State Plan Item 8.1.
7.9b. Coordination of state-operated programs and/or local programs	\$200,000.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9c. Statewide coordination and communication among eligible entities	\$260,000.00	These planned services/activities will be described in State Plan Section 9, state Linkages and Communication.
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need	\$232,601.00	Raise smaller agencies up to a minimum of \$175,000
7.9e. Asset-building programs	0	
7.9f. Innovative programs/activities by eligible entities or other neighborhood groups	\$470,681.00	Innovative programs by eligible entities or COVID19 needs
7.9g. State charity tax credits	\$0.00	
7.9h. Other activities, specify in column 3	\$90,000.00	Native American grants
Total	\$1,353,282.00	
7.10. Remainder/Discretionary Funds Partnerships: Select the types of organizations, if any, the State Plans to work with (by grant or contract using remainder/discretionary funds) to carry out some or all of the activities in table 7.9. [Check all that apply and narrative where applicable]		
<input type="checkbox"/> The state directly carries out all activities (No Partnerships)		
<input checked="" type="checkbox"/> The state partially carries out some activities		
<input checked="" type="checkbox"/> CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds) 28		
<input checked="" type="checkbox"/> Other community-based organizations		
<input checked="" type="checkbox"/> State Community Action association		
<input type="checkbox"/> Regional CSBG technical assistance provider(s)		
<input checked="" type="checkbox"/> National technical assistance provider(s)		
<input checked="" type="checkbox"/> Individual consultant(s)		
<input checked="" type="checkbox"/> Tribes and Tribal Organizations		
<input type="checkbox"/> Other		
Note: This response will link to the corresponding CSBG assurance, item 14.2.		
7.11. Performance Management Adjustment: Describe any adjustments the state will make to the use of remainder/discretionary funds under this State Plan as compared to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.		
Note: This information is associated with State Accountability Measures 3Sb, and may pre-populate the State's annual report form.		
The state agreed to an increase in numbers with one of our local Native American Tribes. This will decrease our state allocation thus decreasing the		

smaller agencies allocations. We increase our smaller agency allocations using discretionary funding to get them to at least a minimum amount of \$175,000. This year and possibly the next, we will be using discretionary funding as the need occurs with our eligible entities due to COVID19 and unforeseen circumstances. We are responding to the crisis by having additional discretionary funding ready and available where needed. We will also be using some discretionary dollars to purchase our new statewide data solution for improved intake and reporting.

Section 8: State Training and Technical Assistance

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

Form Approved
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Expires:06/30/2021

SECTION 8 State Use of Funds

8.1. Describe the State's plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan by completing the table below.

(CSBG funding used for this activity is referenced under item 7.9(a), Remainder/Discretionary Funds. States should also describe training and technical assistance activities performed directly by state staff, regardless of whether these activities are funded with remainder/discretionary funds.)

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

Training and Technical Assistance - Year One

	Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
1	FY1-Q4	Training	Other	Annual conference - multiple topics
2	All quarters	Both	Communication	
3	Ongoing / Multiple Quarters	Training	Governance/Tripartite Boards	
4	Ongoing / Multiple Quarters	Training	Other	Community Engagement: Bridges out of Poverty, Two Generational Approach, Anti-Racism Diversity Equity and Inclusion
5	All quarters	Training	Other	Leadership Development Institute
6	FY1-Q4	Training	Strategic Planning	
7	FY1-Q4	Training	Community Assessment	
8	Ongoing / Multiple Quarters	Both	ROMA	
9	Ongoing / Multiple Quarters	Both	Reporting	
10	Ongoing / Multiple Quarters	Both	Correcting Significant Deficiencies Among Eligible Entities	
11	Ongoing / Multiple Quarters	Both	Organizational Standards for eligible entities with unmet TAPs and QIPs	
12	Ongoing / Multiple Quarters	Training	Other	Human Resource Management
13	Ongoing / Multiple Quarters	Training	Fiscal	
14	Ongoing / Multiple Quarters	Both	Other	Peer to Peer Networking
15	Ongoing / Multiple Quarters	Both	Technology	
16	Ongoing / Multiple Quarters	Both	Monitoring	

Training and Technical Assistance - Year Two

	Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
1	FY2-Q4	Training	Other	Annual conference - multiple topics
2	All quarters	Both	Communication	
3	Ongoing / Multiple Quarters	Training	Governance/Tripartite Boards	
4	Ongoing / Multiple Quarters	Training	Other	Community Engagement: Bridges out of Poverty, Two Generational Approach, Anti-Racism Diversity Equity and Inclusion
5	All quarters	Training	Other	Leadership Development Institute
6	FY2-Q4	Training	Strategic Planning	

7	FY2-Q4	Training	Community Assessment	
8	Ongoing / Multiple Quarters	Both	ROMA	
9	Ongoing / Multiple Quarters	Both	Reporting	
10	Ongoing / Multiple Quarters	Both	Correcting Significant Deficiencies Among Eligible Entities	
11	Ongoing / Multiple Quarters	Both	Organizational Standards for eligible entities with unmet TAPs and QIPs	
12	Ongoing / Multiple Quarters	Training	Other	Human Resource Management
13	Ongoing / Multiple Quarters	Training	Fiscal	
14	Ongoing / Multiple Quarters	Both	Other	Peer to Peer Networking
15	Ongoing / Multiple Quarters	Both	Technology	
16	Ongoing / Multiple Quarters	Both	Monitoring	

8.1a. Training and Technical Assistance Budget: The planned budget for the training and technical assistance plan (as indicated in the Remainder/Discretionary Funds table in item 7.9):

Year One	\$100,000	Year Two	\$100,000
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8.1b. Training and Technical Assistance Collaboration: Describe how the state will collaborate with the state association and other stakeholders in the planning and delivery of training and technical assistance.

The state (BCAEO) contracts with the State Association (MCA) to provide training and technical assistance to our 28 CAAs. BCAEO and MCA work together to create an annual training plan for MCA to carry out. Additional trainings are also delivered as needed to those agencies not meeting certain requirements. BCAEO supports MCAs summer conference. MCA also coordinates with BCAEO to create the RPIC training report. Due to the pandemic, BCAEO and MCA are looking into online learning systems.

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

Note: This information is associated with State Accountability Measure 6Sb. QIPs are described in Section 678C(a)(4) of the CSBG Act. If the State, according to their corrective action procedures, does not plan to put a QIP in place for an eligible entity with one or more unmet organizational standards, the State should put a TAP in place to support the entity in meeting the standard(s).

8.2a. Address Unmet Organizational Standards: Describe the state's plan to provide T/TA to eligible entities to ensure they address unmet Organizational Standards. Any agencies with unmet Organizational Standards are placed on a technical assistance plan and followed up with until it is corrected. If training or technical assistance is required, either BCAEO or MCA will assist the agency.

8.3. Training and Technical Assistance Organizations: Indicate the types of organizations through which the State Plans to provide training and/or technical assistance as described in item 8.1, and briefly describe their involvement. [Check all that apply.]

- CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds)
- Other community-based organizations
- State Community Action association
- Regional CSBG technical assistance provider(s)
- National technical assistance provider(s)
- Individual consultant(s)
- Tribes and Tribal Organizations
- Other

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

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

The state was scheduled to host the 2020 NASCSP conference, but it was put on hold due to COVID19. The state is making adjustments on T/TA by listening to CAA feedback and making more training options available, such as online recordings of trainings and webinars. The state's Risk Assessment (called the STAR Assessment; State Technical Assessment Report) lists possible training opportunities. The state association has been included in all Technical Assistance Plans sent to the agencies so they can provide the needed trainings. Most trainings and technical assistance will be held virtually until the pandemic has passed.

Section 9: State Linkages and Communication

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

Form Approved
OMB No:0970-0382
Expires:06/30/2021

SECTION 9 State Linkages and Communication

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

9.1. State Linkages and Coordination at the state Level:

Describe the linkages and coordination at the state level that the State plans to create or maintain to ensure increased access to CSBG services to low-income people and communities under this State Plan and avoid duplication of services (as required by the assurance under Section 676(b)(5)).

Describe or attach additional information as needed. [Check all that apply and narrative where applicable]

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

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

Emergency Management; Public Health/Disease Control

9.2. State Linkages and Coordination at the Local Level:

Describe the linkages and coordination at the local level that the state to create or maintain with governmental and other social services, especially antipoverty programs, to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services, (and as required by assurances under Sections Sections 676(b)(5) - (6))

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

During the Coronavirus (COVID19) outbreak, the state worked closely with other state and local partners to get immediate assistance to low-income clients in need. Many people lost their jobs, had to home-school, were quarantined, or somehow affected by COVID19. Partnerships were created to provide Personal Protective Equipment to CAAs as well as to help create immediate food and hygiene kits to those in need. Partnerships were created with our water providers to provide discounts and pay water bills. We worked with the Health Department, 211, United Way, and Area on Aging to provide food and/or deliver food to those in quarantine. Additional funding was requested and received for PPE, water assistance, migrant assistance, and necessary kits for those who were affected by COVID19. A Social Justice and Racial Inequities workgroup was also started across the CAA network and the state is supporting it.

9.3. Eligible Entity Linkages and Coordination

9.3a. State Assurance of Eligible Entity Linkages and Coordination:

Describe how the state will assure that the eligible entities will coordinate and establish linkages to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by the assurance under Section 676(b)(5)).

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

Most CAAs are participants in the local Emergency Service Provider Network and/or local Continuum of Care. This participation fosters optimum coordination of services at the local level. This helped build and enforce strong relations with the local health department during the Coronavirus (COVID19) outbreak. Steps were taken immediately to get emergency food and shelter to those affected by COVID19. In addition, the following activities promote and require linkages and coordination of services across the state. Michigan CAAs operate nearly 40 percent of the Head Start

programs. These programs require coordination with various child and family support services and Work First programs. As the largest senior services provider, CAAs work closely with their local Area Agencies on Aging. As the largest emergency food provider, CAAs coordinate and network with their area emergency food providers including churches, food coalitions, Gleaners, Red Cross food banks, The Salvation Army, and The United Way. One agency mainstreamed the application of Head Start and GSRP so there is one pre-application. This allows CAA eligible families to be referred to the most appropriate program for their needs. The state assures this through Monitorings and reviewing the agency's CAP.

9.3b State Assurance of Eligible Entity Linkages to Fill Service Gaps:

Describe how the eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations, according to the assurance under Section 676(b)(3)(B) of the CSBG Act.

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

The CAAs actively participate in local networking and planning organizations, including multi-purpose collaborative bodies, human service coordinating bodies, continuum of care, workforce development boards, and more. As participants, they take an active role in identifying gaps in services and join together with community leaders and service providers in planning and developing methods of getting services where they are needed while also trying to avoid duplication of Services. During COVID19, our CAAs stood strong and worked continuously to keep providing the services that were and still are needed.

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

Does the state intend to include CSBG employment and training activities as part of a WIOA Combined State Plan, as allowed under the Workforce Innovation and Opportunity Act (as required by the assurance under Section 676(b)(5) of the CSBG Act)? Yes No

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

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

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

In Michigan, federal workforce development programs are administered by the Department of Talent and Economic Development and workforce development services are administered locally through Workforce Development Boards. These boards represent the private sector as well as local government agencies, education, social services, labor, community-based organizations and other groups affecting workforce development in a community. Through this private-public partnership, Michigan's workforce development system -- Michigan Works! -- delivers employment and training programs across the state. The Michigan Works! Agencies (MWAs) oversee a wide variety of programs designed to prepare youth, unskilled adults and dislocated workers for entry into the labor force and to help individuals who are disadvantaged or who face serious barriers to employment obtain the training necessary to get and keep a job. Several CAAs in Michigan are part of a larger organization or are associated with another organization that is an MWA. These CAAs can provide direct supportive and referral services to their clients who are eligible for the employment and training programs offered by the MWA(s). In addition, several CAAs have entered into agreements with their local MWAs to provide specific services for low-income persons participating in their education and training programs. Many CAAs are involved in the provision of transportation, including direct transportation and car donation, financing and repair programs. Others have developed programs that provide case management, career training or job opportunities. CAAs that use CSBG funds for employment and training activities enter into a memorandum of understanding with their local MWA as required by the Workforce Innovation and Opportunity Act.

9.5. Emergency Energy Crisis Intervention:

Describe how the state will assure, where appropriate, that emergency energy crisis intervention programs under Title XXVI (relating to Low-Income Home Energy Assistance) are conducted in each community in the state, as required by the assurance under Section 676(b)(6) of the CSBG Act).

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

BCAEO works collaboratively with out LIHEAP office as well as the Michigan Public Service Commission. We have partnered with both to receive funding for the CAA network for utility bills, including heat and water.

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

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

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

The annual CAP requires CAAs to explain how they will coordinate funds by collaborating and partnering with other organizations. These partners (public and private) are then required to be entered into our statewide database for review. BCAEO reviews this information annually.

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

Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act.

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

Since most of our CAAs use a major portion of their CSBG funds to support the under-funded management costs of their direct service programs, as well as for central operational/administrative costs, the coordination of public and private resources is one of their most outstanding characteristics. They coordinate the vast majority of their programs with public and private resources and have both verbal and written agreements concerning coordination, referrals, exchange of information, specific services to be provided, funding, and volunteers. They are required to list all partners in the statewide database. Examples of public resources include: hospitals and health care providers; law-enforcement and courts; schools and juvenile offices; local MDHHS offices; transit and housing development authorities; public utilities; commissions on aging; Work First and One Stop centers; federal grantors. Examples of private resources include: volunteers, mentoring and literacy coalitions; child and senior care providers; farm worker and migrant

services organizations; energy and transportation providers; churches, food pantries and Gleaners; foundations; Walk for Warmth, Urban Leagues, United Way, Red Cross, Salvation Army; and banks and lending institutions. Through the CSBG Advisory Committee, it was suggested that the CAP plan ask for clear examples of how the CAAs are using CSBG dollars to leverage other funding sources. This question is now a required part of their CAP.

9.8. Coordination among Eligible Entities and State Community Action Association:

Describe state activities for supporting coordination among the eligible entities and the state community action association.

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

The state association (MCA) is copied on all communications to the CAA network. The state contracts our training dollars with MCA and discussions/surveys are held to determine training assistance needs and the needs of the CAAs. MCA is working in collaboration with the state and has created a shared website for CAA training and technical use. MCA attends BCAEO Commission Meetings and meets at least monthly with BCAEO staff and quarterly with MDHHS to maintain close ties and to expand cooperation, coordination and innovation. MCA and BCAEO also work together to submit the required RPIC state training plan. The BCAEO Executive Director holds monthly BCAEO Leadership webinars to enhance the coordination of performance in the network.

9.9. Communication with Eligible Entities and the State Community Action Association:

In the table below, detail how the state intends to communicate with eligible entities, the state community action association, and other partners identified under this State Plan on the topics listed below. For any topic that is not applicable, select "Not Applicable" under Expected Frequency.

Communication Plan

Subject Matter	Expected Frequency	Format	Brief description of "Other"
Upcoming Public and/or Legislative Hearings	Annually	Newsletters Meetings/Presentation Email Website Webinar Public Notice	
State Plan Development	As needed	Meetings/Presentation Email	
Organizational Standards Progress	Annually	Phone Calls	
State Accountability Measures Progress	As needed	Meetings/Presentation	
Community Needs Assessments/ Community Action Plans	Annually	Email	
State Monitoring Plans and Policies	As needed	Phone Calls	
Training and Technical Assistance (T/TA) Plans	As needed	Email 1:1 Letters/Hard Copies	
ROMA and Performance Management	Upon Request	Other	Virtual trainings
State Interagency Coordination	As needed	Meetings/Presentation	
CSBG Legislative/Programmatic Updates	As needed	Meetings/Presentation	
Tripartite Board Requirements	As needed	Other	Policy Updates or webinars

	Topic	Expected Frequency	Format	Brief Description of "Other"
1	Contract Updates	As needed	Email	

9.10. Feedback to Eligible Entities and State Community Action Association:

Describe how the state will provide information to local entities and state community action associations regarding performance on state accountability measures.

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

The state sought input and made changes based on that input from the CSBG Advisory group, resulting in a more effective Communication plan using technology with monthly newsletter (BCAEO Update). The Update makes front line staff feel more connected. We have created an external SharePoint that all CAAs have access to. The BCAEO Update is now sent through Constant Contact. BCAEO has utilized FACSPRO documents center and SharePoint to share ideas/instructions to improve processes, suggested forms - New documents in FACSPRO are now flagged. The BCAEO Leadership webinars also provide information.

9.11. Performance Management Adjustment:

Describe any adjustments the state made to the Communication Plan in this State Plan as compared to past plans. Any adjustment should be

based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail.

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

The state created an external SharePoint site where agencies can find information we post and share. We learned that our monthly newsletter is very informative and CAAs want us to start archiving them. During COVID19, virtual contact has become the norm. We use GotoWebinar and Teams meetings to stay in contact with our agencies. Our webinars are all recorded and placed on SharePoint for those that need to reference them.

Section 10: Monitoring, Corrective Action, and Fiscal Controls

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

Form Approved
OMB No: 0970-0382
Expires:06/30/2021

SECTION 10 State Use of Funds

Monitoring, Corrective Action and Fiscal Controls (Section 678B(a) of the Act)

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

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

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

	CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of "Other"
1	Allegan County Resource Development Committee Inc	Other	Desk Review	FY1 Q3			All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
2	Kent, County of (Inc)	Other	Desk Review	FY1 Q3	02/28/2020	08/21/2020	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
3	Baraga-Houghton-Keweenaw Community Action Agency, Inc	Other	Desk Review	FY1 Q4	03/21/2019	05/21/2019	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
4	Blue Water Community Action	Other	Desk Review	FY1 Q3	06/03/2019	06/03/2019	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
5	Capital Area Community Services Incorporated	Other	Desk Review	FY1 Q3	08/12/2019	08/16/2019	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
6	Chippewa Luce Mackinac Community Action Human Resource Authority, Incorporated	Other	Desk Review	FY1 Q4			All Monitorings will be done with Desk Reviews during the

							Coronavirus Pandemic.
7	Community Action Agency of South Central Michigan, The	Other	Desk Review	FY1 Q3	01/29/2020	05/13/2020	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
8	Dickinson Iron Community Services Agency	Other	Desk Review	FY1 Q3	08/07/2019	08/21/2019	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
9	EightCAP Inc	Other	Desk Review	FY1 Q3	06/10/2019	06/25/2019	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
10	Alger Marquette Community Action Board	Other	Desk Review	FY1 Q4			All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
11	Community Action Agency	Other	Desk Review	FY1 Q4	08/09/2019	09/03/2019	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
12	FiveCAP Inc	Other	Desk Review	FY1 Q3			All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
13	Genesee, County of	Other	Desk Review	FY1 Q3	07/12/2019	07/30/2019	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
14	Gogebic-Ontonagon Community Action	Other	Desk Review	FY1 Q3	08/08/2019	08/08/2019	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
15	Human Development Commission Inc	Other	Desk Review	FY1 Q4	06/26/2019	11/21/2019	All Monitorings will be done with Desk Reviews during the Coronavirus

							Pandemic.
16	Macomb, County of	Other	Desk Review	FY1 Q4	08/13/2019	12/19/2019	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
17	Human Resources Authority Inc	Other	Desk Review	FY1 Q3	08/09/2019	09/25/2019	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
18	Mid Michigan Community Action Agency Inc	Other	Desk Review	FY1 Q3	12/13/2019	02/04/2020	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
19	Monroe County Opportunity Program, Inc	Other	Desk Review	FY1 Q4	09/17/2019	09/18/2019	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
20	Northeast Michigan Community Service Agency Inc	Other	Desk Review	FY1 Q3	07/12/2019	07/19/2019	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
21	Northwest Michigan Community Action Agency Inc	Other	Desk Review	FY1 Q2	08/19/2019	11/27/2019	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
22	Oakland Livingston Human Services Agency	Other	Desk Review	FY1 Q3	01/07/2019	02/21/2019	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
23	Ottawa, County of	Other	Desk Review	FY1 Q3	06/24/2019	06/24/2019	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
24	Saginaw County Community Action Committee	Other	Desk Review	FY1 Q3	08/30/2019	10/10/2019	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.

25	Southwest Michigan Community Action Agency	Other	Desk Review	FY1 Q4			All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
26	Washtenaw, County of	Other	Desk Review	FY1 Q4	04/11/2019	06/05/2019	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
27	Wayne Metropolitan Community Action Agency	Other	Desk Review	FY1 Q2	02/26/2020	06/04/2020	All Monitorings will be done with Desk Reviews during the Coronavirus Pandemic.
28	Muskegon Oceana CAP Inc	No review					
	CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of "Other"
1	Allegan County Resource Development Committee Inc	Full On-site	Onsite Review	FY2 Q3			
2	Kent, County of (Inc)	Full On-site	Onsite Review	FY2 Q3	02/28/2020	08/21/2020	
3	Baraga-Houghton-Keweenaw Community Action Agency, Inc	Full On-site	Onsite Review	FY2 Q3	03/21/2019	05/21/2019	
4	Blue Water Community Action	Full On-site	Onsite Review	FY2 Q2	06/03/2019	06/03/2019	
5	Capital Area Community Services Incorporated	Full On-site	Onsite Review	FY2 Q3	08/12/2019	08/16/2019	
6	Chippewa Luce Mackinac Community Action Human Resource Authority, Incorporated	Full On-site	Onsite Review	FY2 Q3			
7	Community Action Agency of South Central Michigan, The	Full On-site	Onsite Review	FY2 Q2	01/29/2020	05/13/2020	
8	Dickinson Iron Community Services Agency	Other	Desk Review	FY2 Q3	08/07/2019	08/21/2019	Programmatic and Financial monitoring will be done through a desk review.
9	EightCAP Inc	Full On-site	Onsite Review	FY2 Q3	06/10/2019	06/25/2019	
10	Alger Marquette Community Action Board	Full On-site	Onsite Review	FY2 Q3			
11	Community Action Agency	Full On-site	Onsite Review	FY2 Q3	08/09/2019	09/03/2019	
12	FiveCAP Inc	Full On-site	Onsite Review	FY2 Q3			
13	Genesee, County of	Full On-site	Onsite Review	FY2 Q3	07/12/2019	07/30/2019	
14	Gogebic-Ontonagon Community Action	Full On-site	Onsite Review	FY2 Q3	08/08/2019	08/08/2019	
15	Human Development Commission Inc	Full On-site	Onsite Review	FY2 Q3	06/26/2019	11/21/2019	
16	Macomb, County of	Other	Desk Review	FY2 Q3	08/13/2019	12/19/2019	Programmatic and Financial monitoring will be done through desk review.
17	Human Resources Authority Inc	Full On-site	Onsite Review	FY2 Q3	08/09/2019	09/25/2019	

18	Mid Michigan Community Action Agency Inc	Full On-site	Onsite Review	FY2 Q3	12/13/2019	02/04/2020	
19	Monroe County Opportunity Program, Inc	Full On-site	Onsite Review	FY2 Q3	09/17/2019	09/18/2019	
20	Northeast Michigan Community Service Agency Inc	Full On-site	Onsite Review	FY2 Q3	07/12/2019	07/19/2019	
21	Northwest Michigan Community Action Agency Inc	Full On-site	Onsite Review	FY2 Q3	08/19/2019	11/27/2019	
22	Oakland Livingston Human Services Agency	Other	Desk Review	FY2 Q3	01/07/2019	02/21/2019	Programmatic and Financial monitoring will be done through desk review.
23	Ottawa, County of	Full On-site	Onsite Review	FY2 Q3	06/24/2024	06/24/2024	
24	Saginaw County Community Action Committee	Full On-site	Onsite Review	FY2 Q3	08/30/2019	10/10/2019	
25	Southwest Michigan Community Action Agency	Full On-site	Onsite Review	FY2 Q4			
26	Washtenaw, County of	Full On-site	Onsite Review	FY2 Q4	04/11/2019	06/05/2019	
27	Wayne Metropolitan Community Action Agency	Full On-site	Onsite Review	FY2 Q2	02/26/2020	06/04/2020	
28	Muskegon Oceana CAP Inc	No review					

10.2. Monitoring Policies:

Provide a copy of state monitoring policies and procedures by attaching and/or providing a hyperlink.

See attached document - 10.2 Monitoring Policy

10.3. Initial Monitoring Reports:

According to the state's procedures, by how many calendar days must the State disseminate initial monitoring reports to local entities?

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

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

10.4. Closing Findings:

Are state procedures for addressing eligible entity findings/deficiencies and documenting the closure of findings, included in the State monitoring protocols attached above? Yes No

10.4a. Closing Findings Procedures: If no describe state procedures for addressing eligible entity findings/deficiencies, and documenting the closure of findings.

10.5. Quality Improvement Plans (QIPs):

Provide the number of eligible entities currently on QIPs, if applicable.

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

1

10.6. Reporting of QIPs:

Describe the state's process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the State approving a QIP

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

BCAEO will send communication to the Office of Community Services within 30 calendar days after approving a QIP from an agency that has been listed as high risk with serious deficiencies.

10.7. Assurance on Funding Reduction or Termination:

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

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

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

10.8. Eligible Entity Designation: Do the State CSBG statute and/or regulations provide for the designation of new eligible entities? Yes No

10.8a. New Designation Citation: If yes, provide the citation(s) of the law and/or regulation.

https://www.michigan.gov/mdhhs/0,5885,7-339-73970_5093_28508_76839---,00.html] R 400.19601 Designation of community action agencies status. Rule 601. The bureau shall designate, or rescind the designation of, CAAs pursuant to the provisions of section 8 of the act. R 400.19602 Community action agency designation; responsibilities and functions. Rule 602. (1) A community action agency shall not be officially designated as such by the executive director, unless the community or entity is any of the following: (a) A city, village, or township, or a combination of such units of government which are contiguous, with a population of not less than 150,000 people according to the most recent available census data. (b) A county or a group of contiguous counties with a minimum of 100,000 people according to the most recent available census data. (c) One or more federally or state-recognized Indian reservations. (2) If, due to a boundary change, a community served by a CAA ceases to meet the requirements of subrule (1)(a) or (b) of this rule, the executive director, with the advice of the commission, shall determine if the loss in population constitutes grounds for withdrawing the executive director's official designation of the CAA serving the community. The executive director's decision shall take into consideration the past performance of the agency and the prospects for its continued viability and effectiveness. (3) To be designated as a CAA, the governing/advisory board of the agency shall submit a request, in writing, to the executive director. (4) The request or designation must identify a private non-profit organization. (5) The executive director shall consider the requests or designation under subrules (3) and (4) of this rule approved if a response to the contrary is not received. (6) An organization that requests state CAA designation shall, at the request of the department, conduct 1 or more public hearings to provide citizens in the service area the opportunity to review and comment on the organization's ability to serve the community as a CAA. (7) If a local unit of government is not served by a CAA, the bureau may fund an existing CAA or other eligible organization to serve the residents of the community. (8) To attain or maintain its CAA designation, a CAA must establish a governing/advisory board of directors pursuant to the provisions of section 11 of the act.

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

10.9. Eligible Entity Termination: Do State CSBG statute and/or regulations provide for termination of eligible entities Yes No

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

R 400.19601 Designation of community action agencies status. Rule 601. The bureau shall designate, or rescind the designation of, CAAs pursuant to the provisions of section 8 of the act. R 400.19607 Rescission of community action agency designation. Rule 607. (1) The executive director, pursuant to section 8(2) of the act, may rescind the designation of a CAA for cause if the agency fails to operate bureau-administered programs in compliance with these rules or applicable state and federal laws and regulations. Cause for rescission of a CAA designation may include a combination of any of the following factors: (a) The agency's governing/advisory board does not exercise sufficient authority or leadership to ensure that bureau-administered funds are expended in accordance with applicable regulations, laws, or contractual obligations. (b) The agency's administrative leadership does not demonstrate the administrative knowledge and skills required to ensure that the agency's fiscal, personnel, programs, or property management systems are adequate to support bureau-funded projects. (c) The agency has not properly accounted for bureau-administered funds and property. (d) The agency's general management systems are not adequate to support bureau-funded programs. (e) The agency has not demonstrated the capacity for effective service delivery of bureau-funded programs. (f) The agency has not sufficiently fulfilled its contractual obligations. (g) The agency's liabilities significantly exceed its assets. (h) The agency has filed for bankruptcy. (i) The agency lacks community support and credibility with regard to its ability to competently administer bureau-funded programs. (j) The agency is unable to make substantive improvement in problem areas following a bureau monitoring visit. (2) An agency whose designation has been rescinded by the executive director shall lose its eligibility for formula funding and shall not use the term "community action agency" or "CAA" to refer to itself.

10.9b. Termination Procedures: If no, describe state procedures for termination of new eligible entities and how the procedures were made available to eligible entities and the public

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

10.10a. If Yes, provide the citation(s) of the law and/or regulation.

https://www.michigan.gov/mdhhs/0,5885,7-339-73970_5093_28508_76839---,00.html] PART 6. COMMUNITY ACTION AGENCY (CAA) STATUS DESIGNATION, RECISSION AND CHANGE R 400.19601 Designation of community action agencies status. Rule 601. The bureau shall designate, or rescind the designation of, CAAs pursuant to the provisions of section 8 of the act. History: 1990 AACs; 2015 MR 24, Eff. Dec. 23, 2014. R 400.19602 Community action agency designation; responsibilities and functions. Rule 602. (1) A community action agency shall not be officially designated as such by the executive director, unless the community or entity is any of the following: (a) A city, village, or township, or a combination of such units of government which are contiguous, with a population of not less than 150,000 people according to the most recent available census data. (b) A county or a group of contiguous counties with a minimum of 100,000 people according to the most recent available census data. (c) One or more federally or state-recognized Indian reservations. (2) If, due to a boundary change, a community served by a CAA ceases to meet the requirements of subrule (1)(a) or (b) of this rule, the executive director, with the advice of the commission, shall determine if the loss in population constitutes grounds for withdrawing the executive director's official designation of the CAA serving the community. The executive director's decision shall take into consideration the past performance of the agency and the prospects for its continued viability and effectiveness. (3) To be designated as a CAA, the governing/advisory board of the agency shall submit a request, in writing, to the executive director. (4) The request or designation must identify a private non-profit organization. (5) The executive director shall consider the requests or designation under subrules (3) and (4) of this rule approved if a response to the contrary is not received. (6) An organization that requests state CAA designation shall, at the request of the department, conduct 1 or more public hearings to provide citizens in the service area the opportunity to review and comment on the organization's ability to serve the community as a CAA. (7) If a local unit of government is not served by a CAA, the bureau may fund an existing CAA or other eligible organization to serve the residents of the community. (8) To attain or maintain its CAA designation, a CAA must establish a governing/advisory board of directors pursuant to the provisions of section 11 of the act.

10.10b. If No, describe State procedures for re-designation of existing eligible entities.

Fiscal Controls and Audits and Cooperation Assurance

10.11. Fiscal Controls and Accounting:

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

A. The Federal Reporting Section in MDHHS uses the State's Accounting system and the information database (Desktop Intelligence) to reconcile all expenditures reported in the FFR. B. BCAEO's grant managers and financial monitors ensure all CSBG funds are used appropriately during contract review and approvals, statement of expenditure reviews, and financial monitoring visits.

10.12. Single Audit Management Decisions:

Describe state procedures for issuing management decisions for eligible entity single audits, as required by Block Grant regulations applicable to CSBG at 45 CFR 75.521.

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

The Michigan Department of Health and Human Services, Office of Quality Assurance and Internal Controls reviews the single audit. When findings are listed, the Office of Quality Assurance and Internal Controls requests a response from the agency. BCAEO reviews the finding and the agency's response and submits a management decision letter within the time frame defined by the Office of Quality Assurance and Internal Controls.

10.13. Assurance on Federal Investigations:

The state will "permit and cooperate with Federal investigations undertaken in accordance with Section 678D" of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act. Yes No

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

10.14. Performance Management Adjustment:

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

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

Verbal exit interviews are more timely and helpful according to agency feedback. The state has been working hard to get monitoring reports out in a quicker timeframe. Staff assignments were changed to combine grant management and monitoring duties. This has bumped up monitoring from 2 to 7 staff. Monitoring reports are still timely and usually sent within 3-5 days, which is a huge improvement from past performance.

Section 11: Eligible Entity Tripartite Board

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration for Children and Families Community Services Block Grant (CSBG)	Form Approved OMB No: 0970-0382 Expires:06/30/2021
SECTION 11 State Use of Funds	
11.1. Tripartite Board Verification: Verify which of the following measures are taken to ensure that the state verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B(a)(2) of the CSBG Act <i>[Check all that applies and narrative where applicable]</i>	
<input checked="" type="checkbox"/> Attend Board meetings	
<input checked="" type="checkbox"/> Organizational Standards Assessment	
<input checked="" type="checkbox"/> Monitoring	
<input checked="" type="checkbox"/> Review copies of Board meeting minutes	
<input checked="" type="checkbox"/> Track Board vacancies/composition	
<input type="checkbox"/> Other	
11.2. Tripartite Board Updates: Provide how often the state require eligible entities (which are not on TAPs or QIPs) to provide updates regarding their Tripartite Boards. This includes but is not limited to copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc., <i>[Select one and narrative where applicable]</i>	
<input type="radio"/> Annually	
<input type="radio"/> Semiannually	
<input type="radio"/> Quarterly	
<input type="radio"/> Monthly	
<input checked="" type="radio"/> As it Occurs	
<input type="radio"/> Other	
11.3. Tripartite Board Representation Assurance: Describe how the state will verify that eligible entities have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entity's Tripartite Board as required by the assurance under Section 676(b)(10) of the CSBG Act	
<i>Note: This response will link with the corresponding assurance, item 14.10.</i>	
CAAs follow our CSPM policy, which reflects the CSBG Act. Tri-Partite Board procedures are listed in each CAA's bylaws. This question is included in the CAP that the agencies submit and is reviewed by staff. It is also reviewed during monitoring visits.	
11.4. Tripartite Board Alternative Representation: Does the state permit public eligible entities to use, as an alternative to a Tripartite Board, "another mechanism specified by the state to assure decision-making and participating by low income individuals in the development, planning, implementation, and evaluation of programs" as allowed under Section 676B(b)(2) of the CSBG Act. <input type="radio"/> Yes <input checked="" type="radio"/> No	
11.4a. Tripartite Board Alternative Mechanism: If yes, describe the mechanism used by public eligible entities as an alternative to a Tripartite Board.	

Section 12: Individual and Community Eligibility Requirements

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration for Children and Families Community Services Block Grant (CSBG)	Form Approved OMB No: 0970-0382 Expires:06/30/2021
SECTION 12 Individual and Community Income Eligibility Requirements	
12.1. Required Income Eligibility: Provide the income eligibility threshold for services in the state. <i>[Check one item below.]</i>	
<input type="radio"/> 125% of the HHS poverty line <input checked="" type="radio"/> X% of the HHS poverty line (fill in the threshold) <input type="radio"/> Varies by eligible entity	
200%	% <i>[Response Option: numeric field]</i>
12.1a. Income Eligibility Policy and Procedures: Describe any state policy and/or procedures for income eligibility, such as treatment of income and family/household composition.	
<p>Our CSPM policy for Income Eligibility is lengthy. During the COVID19 Pandemic, we created an emergency policy that states the following: CSBG funding will increase income eligibility to 200% of poverty income guidelines to determine eligibility for services provided with CSBG funds during fiscal year 2020 and fiscal year 2021. This change will occur on April 1, 2020 and go through September 30, 2021. It will return to 125% of poverty on October 1, 2021.</p>	
12.2. Income Eligibility for General/Short-Term Services: Describe how the state ensures eligible entities generally verify income eligibility for those services with limited in-take procedures (where individual income verification is not possible or practical),An example of these services is emergency food assistance.	
<p>In these rare instances, the state will use data that CAAs collect to ensure that the clients of such services are predominantly low-income individuals. There are instructions in our policy. INCOME ELIGIBILITY DETERMINATION EXCEPTION When CSBG funds support short term services with limited intake procedures, and individual income verification is not possible or practical, the Grantee may not always be required to conduct individualized eligibility determinations. This may happen if services are: 1. Provided to a group, rather than to individuals, and circumstances indicate that group members will predominantly be income-eligible a. Financial literacy (or other program) information and materials provided at community gathering in low-income area or to Head Start parents b. Donations of food or meals c. Summer meals for youth Examples: 2. Provided on individual basis but impossible or impracticable to obtain income documentation. a. Part of outreach to potential clients, such as open house at CAA b. Initial intake and information referral process c. Temporary shelter to homeless individuals d. Disaster relief Examples: 3. Intended to increase community awareness of or involvement in poverty issues a. Poverty Forum b. Building Partnerships with other organizations NOTE: CAAs should make every effort possible to obtain client information to include in the CSBG Annual Report. To exclude eligibility determination for certain programs/clients, CAAs must document the following: a. Name of program b. Service Area c. Reason for eligibility determination exclusion (1,2, or 3 above or other) d. Proof that the clients will be predominantly income-eligible. (Census data, Community Assessment documentation of the neighborhood, percentage of low-income people in area, etc.) NOTE: For all programs that are supported by CSBG funds, Grantees must provide reasonable, documented evidence that the proportion of program clients who are CSBG-eligible is equal to or greater than the proportion of program costs paid with CSBG funds, or the proportion of program staff time devoted to serving CSBG-eligible clients is equal to or greater than the proportion of program costs paid with CSBG funds. Example: if CSBG supports 30% of a program's costs, then the agency must be able to demonstrate that at least 30% of the clients served have incomes at or below 125% of the federal poverty level, or at least 30% of staff time is allocated to serving CSBG-eligible clients. Example: if 10% of clients are documented as eligible, no more than 10% of funds should come from CSBG.</p>	
12.3. Community-targeted Services: Describe how the state ensures eligible entities' services target and benefit low-income communities for services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations).	
<p>CAAs choose community-targeted services based on results of their Community Needs Assessments and Strategic Planning. Their entire mission is based on providing services to low-income communities. Many agencies are working on Community Initiatives that are not reported in the Annual Report because of limitations. Because of this, we added a question in our Community Action Plan revolving around Community Initiatives asking them to explain the projects they are working on.</p>	

Section 13: Results Oriented Management and Accountability (ROMA) System

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration for Children and Families Community Services Block Grant (CSBG)	Form Approved OMB No: 0970-0382 Expires:06/30/2021
SECTION 13 Results Oriented Management and Accountability (ROMA) System	

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

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

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

13.1a. ROMA Description: If ROMA was chosen in Item 13.1, describe the state's written policies, procedures, or guidance documents on ROMA.

The state requires CAAs to submit logic models annually with their CAP. CAA's receive direction annually through state policy and guidelines. We have written guidance based on ROMA Next Gen information that agencies use. Our Policy states: REFERENCES The CSBG Act, P.L. 97-35 of 1981, as amended by the Coates Human Services Reauthorization Act of 1998. The CSBG Act, as amended by the Human Service Amendments of 1994 (P.L. 103-152), CSPM 500 Series. This item provides guidelines and instructions for preparation and submittal of the FY2021 CSBG Community Action Plan (CAP). CAAs shall prepare and submit an FY2021 CSBG CAP in accordance with the guidelines below. Community Action Plan ; Complete the plan for the period October 1, 2020 through September 30, 2021, using the Application and Instructions we send. CSBG Expenditure Plan - Complete the expenditure plan for the period October 1, 2020 through September 30, 2021, using the Excel sheet. CSBGD Budget (Required only for smaller agencies) - Complete the CSBGD budget using the CSBGD amount to increase the CSBG allocation to \$175,000. Logic Models- Complete your logic models for FY21 in FACSPRO. Logic Models must be completed in FACSPRO and the CAP, Program and Funding Spreadsheet and Expenditure Plan must be submitted electronically to the BCAEO mailbox by August 14, 2020. SUBMITTAL PROCESS Send your completed CSBG CAP through our SharePoint site. Questions regarding the CSBG CAP should be directed to your grant manager. Attachments - CSBG Application; CSBG Expenditure Plan; CSBGD Budget - Smaller Agencies Only; CSBG Application Instructions ; Checklist for Preparing BCAEO Budgets. The ROMA Implementation Checklist and guidance is shared on our SharePoint site.

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

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

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

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

The state allows agencies to create state indicators that are not part of the National Performance Indicators.

13.3. Eligible Entity Support: Describe how the state supports the eligible entities in using the ROMA or alternative performance measurement system.

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

The state currently has ten certified ROMA trainers. The state office has 4 of the 10 trainers on staff. BCAEO provided state-wide ROMA training for all CAAs. The state association, in collaboration with BCAEO, held ROMA train the trainer trainings in FY20. BCAEO created a ROMA Collaborative in 2012 made up of staff from CAAs, board members, the state association, and the state. Within that Collaborative there is an NPI sub-Committee that is working on suggested NPIs for agencies using the same programs. Logic models are a required part of the CSBG CAP. The state has started ROMA Implementer Training as well and has multiple CAA staff trained as well as 1 state ROMA Implementer.

13.4. Eligible Entity Use of Data:
 Describe how is the state plan to validate the eligible entities that are using data to improve service delivery?

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

This question has been included again as part of the CSBG FY21 CAP that CAAs will have to answer. The state will review performance toward meeting the three CSBG National Goals utilizing the National Performance Indicators (developed within the Community Services Network). Each CAA will report on the National Indicators that are applicable to their agency's programs. ROMA planning (identifying performance targets) will be included as part of the CAA Community Action Plan by using Logic Models. Agencies will use a statewide database for measuring and reporting outcomes. A review

of the agency's data collection methods will be cross-referenced with their CNA and planning tools. In addition, monitors will look at board minutes to ensure the boards are making informed data-driven decisions. BCAEO is validating by conducting Board Interviews and reviewing Board minutes and conducting front line staff interviews during monitoring visits. Some agencies have re-enrollment letters with quality of service questions, stakeholder/ community partner surveys as part of strategic planning, client surveys. The state hired a ROMA Data staff person that is taking a deeper dive into agency outcomes and has created some data dashboards.

Community Action Plans and Needs Assessments

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

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

All eligible entities (CAAs) requesting CSBG funds are required to submit a CAP in the format prescribed by the state to our SharePoint site. Planning allocation amounts, program requirements, plan criteria, and other pertinent data are distributed annually as a CSBG item update in the BCAEO's CSPM. CAAs are required to include a copy of their latest Community Needs Assessment [676(b)(11)] (the state recommends that CAAs conduct an assessment every three years.) CAPS are reviewed by BCAEO grant manager staff using a CAP checklist review guide for allowability of the use of funds. CAPs are then reviewed by the CSBG Specialist and the BCAEO director to look for cost reasonableness as well as the potential for the proposed activities to move low-income clients toward self-sufficiency. Funding is not distributed until the CAPs are approved.

13.6. Community Needs Assessment:

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

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

CAAs are required to include a copy of their latest Community Needs Assessment with their annual CAP (the state recommends that CAAs conduct an assessment every three years.) When an agency fails to conduct a CNA within three years, the agency receives a monitoring letter with a CNA finding. The letter requires a corrective action plan or Technical Assistance Plan to correct the deficiency.

Section 14: CSBG Programmatic Assurances and Information Narrative

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

Form Approved
OMB No: 0970-0382
Expires:06/30/2021

SECTION 14 State Use of Funds

14.1 Use of Funds Supporting Local Activities

CSBG Services

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

(A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farm workers, 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;

Most CAAs are participants in the local Emergency Service Provider Network and/or local Continuum of Care; this participation fosters optimum coordination of services at the local level. In addition, the following activities promote and require linkages and coordination of services across the state. Michigan CAAs operate nearly 40 percent of the Head Start programs. These programs require coordination with various child and family support services and Work First programs. As the largest senior services provider, CAAs work closely with their local Area Offices on Aging. As the largest emergency food provider, CAAs coordinate and network with their area emergency food providers including churches, food coalitions, Gleaners, Red Cross Food Banks, The Salvation Army, The United Way, and more. The LIHEAP crisis component, through State Emergency Relief (SER) energy services, is administered by local MDHHS offices and the maintenance component through the state's Department of Treasury through the Home Heating Credit (HHC) program. Some CAAs assist MDHHS with the SER crisis component (by providing SER payments) through contracts with local county offices and others coordinate and refer clients to the county offices for SER funds. Also, CAAs assist clients with their HHC applications during their yearly tax preparation assistance programs. In addition to the CSBG Program, the BCAEO also administers the state Weatherization Assistance Program (WAP), funded with DOE and LIHEAP dollars, through the 29 CAAs. The DOE dollars are directly allocated to the state for WAP services. The CAAs have developed referral relationships with their local MDHHS offices for WAP services and work with several local and state resources to collaborate and coordinate for maximum service benefits. Due to the expertise CAA staff have gained through the weatherization program, an increasing number of agencies are moving into state and federally-funded low income housing programs, rehabbing existing housing or partnering with experienced housing developers to produce new housing. An increasing number of CAAs are also becoming involved in housing support services, such as credit counseling, homeownership counseling, and Individual Development Account (IDA) programs.

Needs of Youth

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

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

CAAs work with partners to develop programs to address the needs of youth in the low-income communities throughout Michigan. Some examples are:
1. Providing a Women, Infant and Children (WIC) Program. 2. Purchasing supplies for Head Start classrooms. 3. Summer food programs. 4. Walking

clubs for youths and seniors to develop new friendships and increase self-esteem. 5. Foster grandparent programs. 6. Residential centers that provide treatment for victims of abuse and neglect. 7. Service clubs that provide activities and games for children. 8. Youth recreation and education. 9. Youth employment programs. 10. School success programs.

Coordination of Other Programs

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

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

CAA's participation in the state's welfare reform efforts has continued to increase. For the past several years, MDHHS, through the legislative budget process, has earmarked a portion of its TANF funds to support CAA activities for TANF eligible households. Receipt of these funds require that the CAA coordinate efforts with their local MDHHS and Michigan Works! Agencies in providing case management and supportive services. A number of CAAs are also operating individual development account programs, which assist households in moving further along the road to self-sufficiency. Also, under the Partnership. Accountability. Training. Hope. (PATH) initiative, increasing economic opportunity and reducing poverty through jobs, education, and training; CAAs are a resource to partner and/or collaborate with local MDHHS offices and Michigan Works! Agencies to assist clients with supportive services and, where available, to play an active role in training activities. PATH places a strong emphasis on helping welfare applicants/recipients stay employed, gain skills, and advance. The goal is to help families find the resources they need to overcome obstacles and move up career ladders to self-sustaining, lasting employment. Michigan's CAAs are the largest network of human service providers outside of state government and are playing an active role in welfare reform through their collective and individual efforts including: Their common goal of self-sufficiency for low-income households and collaboration of services with local MDHHS offices; Participation in local collaborative bodies and decision making; Providing case management and supportive services (such as extended day care, transportation, skills enhancement, etc.) for Work First and Welfare-to-Work program participants; Collaborating with local resources while delivering weatherization and home repair services in efforts to minimize energy costs for clients and maximizing their spendable income. Agencies have partnered closely with their local Health Departments during the pandemic to help those with emergency needs and those that are quarantined at home with food and utility bills. Agencies are also partnering to help with the Digital Divide by purchasing cell phones, laptops, and paying for some internet plans for clients, especially those working from home or home schooling due to COVID.

State Use of Discretionary Funds

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

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

Eligible Entity Service Delivery, Coordination, and Innovation

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

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

Most CAAs service delivery systems include information and referral, energy conservation and education, child development and child care, supplemental food programs, older adult nutrition and support services, home buyer assistance, emergency assistance, case management services, tax preparation, and transportation. Clients enter the system various ways. They may have a referral from another human service agency in the county for assistance or from 2-1-1 that meets a specific need such as weatherization. They may have heard of Community Action through word of mouth and contact us themselves. Hospitals make referrals for seniors to participate in Older American Programs. There are various public service announcements reported in the newspaper and radio that alert clients to our services. Also, CAA staff sit on various committees throughout the county or are members of community collaboratives. These members are joined together in a long-term collaborative effort designed to strengthen inter-agency communication, insure coordination, facilitate the continuation of needed existing services, promote community planning activities, and foster the development of consumer focused/culturally relevant services to meet the identified needs of the community.

Eligible Entity Linkages - Approach to Filling Service Gaps

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

Note: The state describes this assurance in the state linkages and communication section, item 9.3b.

The CAAs actively participate in local networking and planning organizations, including multi-purpose collaborative bodies, human service coordinating bodies, continuum of care, workforce development boards, and more. As participants, they take an active role in identifying gaps in services and join together with community leaders and service providers in planning and developing methods of getting services where they are needed while also trying to avoid duplication of Services. During COVID19, our CAAs stood strong and worked continuously to keep providing the services that were and still are needed.

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

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

Note: The state describes this assurance in the state linkages and communication section, item 9.7.

Since most of our CAAs use a major portion of their CSBG funds to support the under-funded management costs of their direct service programs, as well as for central operational/administrative costs, the coordination of public and private resources is one of their most outstanding characteristics. They coordinate the vast majority of their programs with public and private resources and have both verbal and written agreements concerning coordination, referrals, exchange of information, specific services to be provided, funding, and volunteers. They are required to list all partners in the statewide database. Examples of public resources include: hospitals and health care providers; law-enforcement and courts; schools and juvenile offices; local MDHHS offices; transit and housing development authorities; public utilities; commissions on aging; Work First and One Stop centers; federal grantors. Examples of private resources include: volunteers, mentoring and literacy coalitions; child and senior care providers; farm worker and migrant services organizations; energy and transportation providers; churches, food pantries and Gleaners; foundations; Walk for Warmth, Urban Leagues, United Way, Red Cross, Salvation Army; and banks and lending institutions. Through the CSBG Advisory Committee, it was suggested that the CAP plan ask for clear examples of how the CAAs are using CSBG dollars to leverage other funding sources. This question is now a required part of their CAP.

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

14.3d. 676(b)(3)(D) Describe "how the local entity will use the funds [made available under Section 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).

CAAs work with partners to develop programs to address the needs in the low-income communities throughout Michigan. Some examples are: The Bridges Out of Poverty Program; Getting Ahead Program; Energy Education seminars; Community Computer Rooms; Community Nutrition Programs; Parent, Family, and Community Engagement programs; Neighborhood Clean Up Projects; Senior Assistance; Financial Education; Community Baby Shower; Neighborhood-based initiatives; Youth Education; Credit Rebuilder Programs.

Eligible Entity Emergency Food and Nutrition Services

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

The annual CSBG grant agreements incorporate requirements that agencies provide emergency services as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals. In Michigan, CAAs are the largest network of social services outside of state government and the largest emergency food provider network in the state. Most of the CAAs are Temporary Emergency Food Assistance Program (TEFAP) and Commodity Supplemental Food Program (CSFP) service providers and/or provide home-delivered or congregate meals. Food was the number one need in Michigan during the pandemic. Agencies partnered with many other sources to help get food to those in quarantine, homebound seniors, vulnerable and immune compromised people and also those that may have lost employment and fell within the 200% of poverty.

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

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

Note: The state describes this assurance in the state linkages and communication section, items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b.

State Coordination/Linkages and Low-income Home Energy Assistance

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

Note: The state describes this assurance in the state linkages and communication section, items 9.2 and 9.5.

Federal Investigations

14.7. 676(b)(7) Provide "an assurance that the state will permit and cooperate with Federal investigations undertaken in accordance with section 678D." Yes

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

Funding Reduction or Termination

14.8. 676(b)(8) Provide "an assurance that any eligible entity in the state that received funding in the previous fiscal year through a community services block grant made under this subtitle will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the state

determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b)." Yes

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

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

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

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

Eligible Entity Tripartite Board Representation

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

Note: The state describes this assurance in the Eligible Entity Tripartite Board section, 11.3.

CAAs follow our CSPM policy, which reflects the CSBG Act. Tri-Partite Board procedures are listed in each CAA's bylaws. This question is included in the CAP that the agencies submit and is reviewed by staff. It is also reviewed during monitoring visits.

Eligible Entity Community Action Plans and Community Needs Assessments

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

Note: The state describes this assurance in the ROMA section, items 13.5 and 13.6.

State and Eligible Entity Performance Measurement: ROMA or Alternate system

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

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

Validation for CSBG Eligible Entity Programmatic Narrative Sections

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

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



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

Section 15: Federal Certifications

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Community Services Block Grant (CSBG)

Form Approved
OMB No:0970-0382
Expires:06/30/2021

SECTION 15 Federal Certifications

15.1. CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

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

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

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

Statement for Loan Guarantees and Loan Insurance

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

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who

fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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

15.1. Lobbying

After assurance select a check box:



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

15.2. CERTIFICATION REGARDING DRUG-FREE WORKPLACE REQUIREMENTS

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

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

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

2. The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.

3. For grantees other than individuals, Alternate I applies.

4. For grantees who are individuals, Alternate II applies.

5. Workplaces under grants, for grantees other than individuals, need to be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.

6. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or state highway department while in operation, state employees in each local unemployment office, performers in concert halls or radio studios).

7. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).

8. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification.

Grantees' attention is called, in particular, to the following definitions from these rules:

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

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

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

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

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Grantees Other Than Individuals)

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

(a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;

(b) Establishing an ongoing drug-free awareness program to inform employees about--

(1) The dangers of drug abuse in the workplace;

(2) The grantee's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;

(c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);

(d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will - -

(1) Abide by the terms of the statement; and (2) Notify the employer in writing

of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

(e) Notifying the agency in writing, within 10 calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

(f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a federal, state, or local health, law enforcement, or other appropriate agency;

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

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

Place of Performance (Street address, city, county, state, zip code)

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

Alternate II. (Grantees Who Are Individuals)

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

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

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

15.2. Drug-Free Workplace Requirements

After assurance select a check box:



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

15.3. CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS

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

Primary Covered Transactions

Instructions for Certification

1. By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.

2. The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.

3. The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

4. The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.

5. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.

6. The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.

7. The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusive-Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions

8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not

required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

9. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

10. Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

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

(1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:

(a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;

(b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, state or local) transaction or contract under a public transaction; violation of federal or state antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

(c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (federal, state or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and

(d) Have not within a three-year period preceding this application/proposal had one or more public transactions (federal, state or local) terminated for cause or default.

(2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

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

Instructions for Certification

1. By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below

2. The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other

3. The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.

4. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.

5. The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.

6. The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

7. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

8. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

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

originated may pursue available remedies, including suspension and/or debarment.

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.

15.3. Debarment

After assurance select a check box:



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

15.4. CERTIFICATION REGARDING 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.

15.4. Environmental Tobacco Smoke

After assurance select a check box:



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

THE PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13)

Public reporting burden for this collection of information is estimated to average 10 hours per response, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.