



# Oregon

Governor Kate Brown

## Housing and Community Services

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## Community Services Block Grant (CSBG) Model State Plan

### Table of Contents CSBG Cover Page (SF-424M)

- Section 1:** CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter
- Section 2:** State Legislation and Regulation
- Section 3:** State Plan Development and Statewide Goals
- Section 4:** CSBG Hearing Requirements
- Section 5:** CSBG Eligible Entities
- Section 6:** Organizational Standards for Eligible Entities
- Section 7:** State Use of Funds
- Section 8:** State Training and Technical Assistance
- Section 9:** State Linkages and Communication
- Section 10:** Monitoring, Corrective Action, and Fiscal Controls
- Section 11:** Eligible Entity Tripartite Board
- Section 12:** Individual and Community Income Eligibility Requirements
- Section 13:** Results Oriented Management and Accountability (ROMA) System
- Section 14:** CSBG Programmatic Assurances and Information Narrative
- Section 15:** Federal Certifications

## **SECTION 1**

### **CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact And Official State Designation Letter**

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

**Lead agency** - The designation and Statutory Authority for Oregon Housing and Community Services Department to act as the Lead Agency to administer and appropriate funds in the CSBG program is referenced in the Oregon Revised Statutes (ORS) Chapter 458.505. Section 676(a) of the Community Services Block Grant Act requires the Chief Executive of each State designate an appropriate State agency to act as the lead agency for administration of the Community Services Block Grant. Oregon Housing and Community Services (OHCS) has been designated as the lead agency in Oregon for the administration of the Community Services Block Grant. Claire Seguin is the state official designated to sign assurances and receive the grant award.

**Cabinet or administrative department of this lead agency** - Low-Income Housing; Finance and Anti-Poverty Services.

**Division, bureau, or office of the CSBG authorized official** - Oregon Housing and Community Services – Housing Stabilization Division.

**Lead agency website** - [www.oregon.gov/ohcs](http://www.oregon.gov/ohcs)

**Authorized official of the lead agency**

Claire Seguin, Assistant Director  
Oregon Housing and Community Services  
725 Summer St., NE Suite B Salem OR 97301-1266  
503.986.6758  
[claire.seguin@oregon.gov](mailto:claire.seguin@oregon.gov)

**1.2 Provide the following information in relation to the designated State CSBG point of contact.**

Carie Bauer  
CSBG Program Analyst  
Housing Stabilization Division  
Oregon Housing and Community Services  
725 Summer St., NE, Suite B Salem, Oregon 97301-1266  
503.383.6243  
[carie.e.bauer@oregon.gov](mailto:carie.e.bauer@oregon.gov)

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

See Appendix - Item A: Designation Letter (to be attached at submission)

## SECTION 2

### State Legislation and Regulation

- 2.1. CSBG State Legislation: Does the State have a statute authorizing CSBG?** Yes
- 2.2. CSBG State Regulation: Does the State have regulations for CSBG?** Yes
- 2.3 If yes was selected in item 2.1 or 2.2, attach a copy (or copies) of legislation and/or regulations or provide a hyperlink(s), as appropriate.** <http://www.oregonlaws.org/ors/458.505>

**2.4 State Authority:**

**Did the State legislature enact authorizing legislation, or amendments to an existing authorizing statute, last year?** No

**Did the State establish or amend regulations for CSBG last year?** No

**Does the State statutory or regulatory authority designate the bureau, division, or office in the State government that is to be the State administering agency?** Yes

## 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.**

OHCS is the State's housing finance agency and anti-poverty services program administrator. The Department provides financial and program support to develop and preserve opportunities for quality, affordable housing for Oregonians of lower and moderate income, and administers federal and state antipoverty, homeless and energy/weatherization assistance programs.

OHCS administers multiple programs for low-income households that provide a broad array of assistance and services including:

- Community Capacity-Building
- Energy Bill & Weatherization Assistance
- Housing Foreclosure Prevention and Counselor Mediation Services
- Affordable Multifamily Housing Financing through Grants, Tax Credits, Loans and Bond Financing
- Homeless Services
- Homeownership Resources
- Housing Choice Landlord Financial Assistance
- Rental Housing Assistance
- Section 8 Project-Based Assistance
- Asset building through Individual Development Accounts

A growing gap between the number of Oregonians who need affordable housing and the availability of affordable homes has given rise to destabilizing rent increases, an alarming number of evictions of low- and fixed- income people, increasing homelessness, and serious housing instability throughout Oregon.

The state of Oregon is responding to this crisis by using every available tool at its disposal to help communities provide more stable housing to Oregonians with low incomes. Oregon Housing and Community Services (OHCS) is the state agency with responsibility to work on these issues. OHCS' mission is "to provide stable and affordable housing, and engage leaders to develop integrated statewide policy to address poverty and provide opportunity for Oregonians". OHCS provides housing development finance tools to developers of affordable rental housing. OHCS also has responsibility for administering housing stabilization resources through the Community Action network, including funds to prevent and reduce homelessness, implement poverty reduction strategies, and provide energy and weatherization assistance. OHCS also administers programs which help Oregonians access affordable homeownership and avoid foreclosure; which is a critical strategy in this challenging and ever changing housing market.<sup>1</sup>

Under the leadership of Governor Kate Brown, and the collaboration of many community-based and private-sector partners, OHCS is working to extend its reach, and impact, across the entire continuum of affordable housing access and retention.

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

OHCS continues to collaborate with community stakeholders to broaden and improve anti-poverty services in Oregon communities. In partnership with the state association, Community Action Partnership of Oregon (CAPO) and the eighteen community action agencies, OHCS continues to advance towards these goals:

1. Increase utilization of research and evidence-based programs, policies and performance outcomes to ensure all Oregonians have access to effective programs designed to transition people out of poverty.

In 2015, OHCS partnered with CAPO and Oregon State University, as well as regional state CAA partners (WA, ID) to research and identify performance outcomes for community action agencies utilizing a regionally-developed Theory of Change model. The project has completed the first year of research and data collection and in 2016-2017, tested these performance measures at identified pilot project agencies. The culmination of this project has resulted in 43 identified Performance Indicators, under what is now named the Futures Project.

The Futures Project aims to:

- Demonstrate the impact of community action agencies on stabilizing and equipping low-income Oregonians to exit poverty.

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<sup>1</sup> Oregon's 2016-2020 Consolidated Plan; Executive Summary

- Provide local agencies with the data necessary to adapt, improve or better target programs to reach these intended outcomes.

In the fall of 2017, training and technical assistance efforts will be underway, providing community action agencies with the necessary information to prepare for implementation in the 2018 annual data collection cycle and inclusion in the 2018 CSBG Annual Report.

2. To reduce fragmentation and increase coordination across programs, funding sources and with our partners to collectively reduce poverty in Oregon.

Following the work completed in 2015-2016 to provide additional training and tools dedicated to the improvement of Community Needs Assessments across the network, and to remove duplicative processes within OHCS' administration of anti-poverty and homelessness funds, OHCS is prioritizing focus on another critical piece of coordination - the improvement of data collection and reporting.

To start, OHCS has formed a data collection workgroup for the Homeless Management Information System (HMIS). The HMIS Committee consists of OHCS Program Analysts, training and technical assistance (TTA) leads, an HMIS Provider and a community action agency (CAA) representative. In collaboration with the Rural Oregon Continuum of Care (ROCC), of which CAAs are members, monthly training is provided, via meetings, webinars and personal consultations. The ROCC HMIS Lead conducts new user training twice a month. Special need trainings are conducted upon request and include Provider Setup, Data Quality, and ART (Advanced Report Tool) trainings.

OHCS has also created a website of HMIS Training Resources based upon feedback from CAAs in regards to their training needs. This site will be continuously updated and will eventually have video training modules for new users and frequently asked questions. In addition, OHCS is working with CAAs to align required data elements for State funds with HUD UDEs to improve data quality for reporting purposes. Members of the committee have also developed Manuals, and Data Quality and ART (Advanced Reporting Tool) Report Guides.

These steps are a great advancement towards increasing agency capacity and improved data collection efforts and more specifically, ensuring that the rural agencies, often of limited capacity, are provided the opportunity to receive training, technical assistance and peer support.

In addition to continued work on these goals, the CSBG program at OHCS remains aligned and working towards the broader goals established in the new OHCS Consolidated Plan. This planning framework identifies opportunities and strategies to increase our internal and external collective work to meet the following goals:<sup>2</sup>

- Build more affordable units, including units for extremely low income persons;
- Build more accessible units for people with disabilities and units for the elderly;
- Preserve federal rent subsidy and improve condition of housing stock through rehabilitation;

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<sup>2</sup> Oregon's 2016-2020 Consolidated Plan; p. 75

- Promote services to support people at risk of homelessness and work to prevent homelessness through increased housing stability;
- Promote programs that reduce homelessness and re-house people into permanent housing as quickly as possible;
- Work diligently to affirmatively further fair housing and access to housing choice for all Oregonians;
- Promote and support homeownership with focus on addressing the homeownership gap for those communities with a history of having less access to loans and down payments, such as communities of color;
- Work to prevent foreclosures;
- Promote efforts to reduce barriers for people who are difficult to house;
- Support statewide efforts to improve health outcomes for people living in poverty;
- Support statewide efforts to assist community economic recovery efforts, increase economic opportunities for low income people and low wage earners, to help people move out of poverty;
- Improve efforts to support children and families served by Department of Human Services; and
- Collaborate with Department of Land Conservation and Development to help local jurisdictions understand and meet their housing goals and requirements.

OHCS has also begun development of the Statewide Housing Plan. OHCS is placing a greater emphasis on strategic planning and the way we invest our resources. Over the past several years we have been restructuring, refocusing and reimagining our department. Our work has led to a greater emphasis on data, research and customer service. We are carrying that effort forward with the development of the Statewide Housing Plan.

The plan will clearly articulate the extent of Oregon’s housing problem and what can be done to address it. OHCS has committed to the Housing Stability Council and our stakeholders that the plan will be responsive to the needs of the state, delivered to the legislature and include elements of our equity agenda. <sup>3</sup>

The Statewide Housing Plan will include:

- Understanding of the Statewide Housing Need
- Tools to address the housing need
- Promising Practices
- Strategies and partnerships
- Implementation Plan

The results of this plan will be:

- Clear articulation of the state of housing in Oregon
- Clear articulation of the role of the state and the role of our partners, departments, developers and agencies working to reduce the impacts of poverty on low income people
- Reliable data that allows decision makers to consider impacts and alternatives
- Goals and metrics that can be reached with existing resources
- Clear direction for implementation

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<sup>3</sup> Oregon’s Statewide Housing Plan, summary pamphlet.

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

**Analysis of:**

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

**Consultation with:**

- Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)
- State community action association and regional CSBG T & TA providers
- State partners and/or stakeholders (describe)
- National organizations (describe)
- Other (describe)

Oregon consults with many state partners during and leading up to the state plan development. In addition to year-long planning discussions with the state association and the statewide community action network, multiple steps of engagement occur within the planning and development of the Consolidated Plan and the State Housing Plan, both of which inform the state plan application and the goals stated herein.

For example, through the Consolidated Plan process, OHCS consulted with agencies, and housing and service providers across the state to assess and identify the housing, health, and public service needs of Oregon's communities. Oregon reached out and engaged an expansive list of stakeholders, including service providers, nonprofit agencies, advocacy groups, public housing authorities, city officials, for-profit developers, and the public, via roundtable dialogs, panel discussions, web-based surveys, websites, e-mails, focus groups, and through media outlets.

**3.4 Eligible Entity Involvement: Describe the specific steps the State took in developing the State Plan to involve the eligible entities.**

Communities and community action agencies have in multiple ways contributed to the development of this state plan. The Community Action Agency Network is legislatively required to advise OHCS on anti-poverty policy, funding and programming. This advice is systematically

collected through a variety of means, including participation in the Housing Stability Council, State staff attendance of the monthly state association's meetings, and various workgroups addressing housing, homeless and poverty-related services.

CSBG Program staff in collaboration with the state association created and convened a CSBG Workgroup Committee in 2016 to specifically discuss and provide recommendations on key policy and implementation issues that are part of CSBG state plan. The CSBG Workgroup provides recommendations and input on: CSBG fund distribution including allocation process and formula, discretionary policy and process, organizational standards development and implementation, and data collection issues. The Futures Project, regional development of performance measures and implementation of a Theory of Change model to improve accountability and more accurately capture the unique value of CAAs and the breadth of their work, also informs the development of the state plan.

The goals and activities outlined in the plan will continue to be collaboratively implemented, enhanced and refined with the state association and community action network through the ongoing CSBG Workgroup. The workgroup is now a standing committee of the state association board of directors and provides an ongoing means for the state lead agency and the network to discuss and develop strategies related to CSBG and anti-poverty work in Oregon.

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

In 2016, the state benefited from multiple levels of participation in the state plan. The CSBG Workgroup, a group comprised of the director of the state association and several CAA members, provided invaluable insight and feedback into many components of administration of CSBG and state plan development. The Housing Stability Council, a Governor-appointed housing policy group, also reviewed the state plan. Additionally, multiple staff members' involvement in local and statewide planning efforts assisted in informing the state plan.

The state and involved parties found this protocol to be most effective in assuring participation and representation and will continue to develop the state plan in this manner.

**3.5 Eligible Entity Overall Satisfaction: Provide the State's target for eligible entity Overall Satisfaction during the performance period: 45**



## SECTION 4 CSBG Hearing Requirements

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

The state made the plan available for public inspection in multiple ways to ensure the plan was available for review and comment from many, including stakeholders, community members and the low-income population.

The state plan application was posted to the OHCS website for view prior to the public hearing and was distributed electronically to the CAA Network, the Housing Stability Council and the CAA state association. Public hearing notices were posted in three major newspapers across the state.

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

Distribution of the plan to community action agencies and stakeholders began several weeks prior to the hearing. The public hearing notice was posted two weeks prior to the hearing. The plan was available for viewing on the agency website ahead of the public hearing and the public comment period was held open for two weeks after the public hearing.

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

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

Public Hearing Information:

August 14th, 2017  
10:00 am - 11:00 am  
North Mall Office Building, Room # 124B  
725 Summer Street NE, Suite B  
Salem, OR 97301-1266

See Appendix - Item B: Public Hearing Notice & Minutes (to be attached at submission)

**SECTION 5**  
CSBG Eligible Entities

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

AGENCY	PUBLIC or PRIVATE	SERVICE AREA
ACCESS	Private	Jackson County
Community Action Organization (CAO)	Private	Washington County
Community Action Program of East Central Oregon (CAPECO)	Private	Gilliam, Morrow, Umatilla and Wheeler Counties
Community Action Team (CAT)	Private	Clatsop, Columbia and Tillamook Counties
Community Connection of NE Oregon (CCNO)	Private	Baker, Grant, Union and Wallowa Counties
Clackamas County Social Services Division (CCSSD)	Public	Clackamas County
Community Services Consortium (CSC)	Public	Benton, Lincoln and Linn Counties
Community in Action (CiNA)	Private	Harney and Malheur Counties
Klamath Lake Community Action Services (KLCAS)	Private	Klamath and Lake Counties
Lane County	Public	Lane County
Mid –Columbia Community Action Council (MCCAC)	Private	Hood River, Sherman and Wasco Counties
Multnomah County Department of County Human Services (MULTCO)	Public	Multnomah County
Mid-Willamette Valley Community Action Agency (MWVCAA)	Private	Marion and Polk Counties
NeighborImpact	Private	Crook, Deschutes and Jefferson Counties
Oregon Human Development Corporation (OHDC)	Private	Statewide Farm Worker Organization

Oregon Coast Community Action Agency (ORCCA)	Private	Coos and Curry Counties
United Community Action Network (UCAN)	Private	Douglas and Josephine Counties
Yamhill Community Action Partnership (YCAP)	Private	Yamhill County

**5.2 Total number of CSBG eligible entities:** 18

**5.3 Changes to Eligible Entities List: Has the list of eligible entities under item 5.1 changed since the state’s last State Plan submission? If yes, briefly describe the changes.** No

## **SECTION 6**

### Organizational Standards for Eligible Entities

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

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

- The State will use the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138)
- The State will use an alternative set of organizational standards

**6.2 If the State is using the COE-developed organizational standards, does the State propose making a minor modification to the standards, as described in IM 138?** Yes

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

The state will be reducing the standards by one as we plan to merge Standard 1.2 with Standard 3.3. It is our belief that these standards are partially duplicative and logically work together. This minor modification means that the criteria for Standard 3.3 will be expanded to include proof of data collected from low-income community members, in order to absorb the criteria from 1.2.

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

- Regulation
- Policy

- Contracts with eligible entities
- other, describe:

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

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

**Describe the assessment process.**

CSBG eligible entities submit their assessments utilizing an online assessment system. The system has been stylized to work with Oregon’s assessment processes and Oregon-specific state guidance has been incorporated. Any unmet standards require a stated action plan item before the agency may move forward through the assessment. The culmination of these action plan items forms the basis of the Technical Assistance Plan (TAP). Collectively, the state is able to review submissions, approve and track TAPs, and generate reports through the system. Agencies are able to track submission versions, receive reminders for TAPs, and update TAPs for state’s review.

In early 2017, OHCS and the CSBG Workgroup began their review of the initial implementation process. Two very clear goals came out of the implementation review: reduce the burden on agencies that already struggle with limited resources, and provide intensive and varied training and technical assistance to agencies to address any deficiencies identified through the assessments. It is the state’s position that in order to support the agencies in developing procedures and processes that ensure they are maintaining adherence to the standards, appropriate time and training should be given.

Therefore, to meet these goals while upholding the intent of the standards, the state will be making some modifications to the second-year assessment process. First, targeted training and technical assistance will continue to be offered, but with an additional focus on individualized, hands-on assistance. This will occur utilizing multiple types of methods: office visits, conference calls and individual webinars. Second, agencies’ progress will be monitored through completion of TAPs, rather than completion of an additional full assessment. Data shows that Oregon agencies are below the national average, and a significant factor in this was the need for additional time to complete processes and generate documentation, as well as additional training time, with consideration for the first-year learning curve associated with this process. We believe that modifying the second-year assessment process will contribute to agencies’ reaching the goal of 100% compliance by the third year, as well as contribute to entrenched processes that will allow them to maintain compliance moving forward.

Finally, the burden of duplicative processes will be reduced. To achieve this, the many standards that are duplicative to required processes already in effect will be checked during those processes, and not within the assessment system. For example, many of the standards in Category 8: Financial Operations & Oversight are items covered in the annual on-site Fiscal Monitoring visits. Adherence to those standards, and implementation of corrective action plans, will occur under that process. Implementation of this modified process is ongoing, with the state and the CSBG Workgroup working to iron out the details, and the state working with the online assessment software company to modify the assessment submission processes and the best way to track data for reporting figures due each March in the annual report.

In summary, the agencies will do a modified assessment in the second year, a full assessment in the third, and updates to their assessments in the years thereafter. In addition to the CSBG program coordinator, staff from the fiscal compliance department will participate in the assessment process during annual on-site monitoring. For the fiscal processes that have been deemed duplicative, and will be removed from the online system, the Fiscal Monitor will provide the notification, training and supervision of TAP completion, while apprising the CSBG Program Coordinator of the progress. With these modifications, the state continues to view this as an annual process of ensuring that agencies are instituting procedures and processes that increase organizational stability, capacity and communication.

Homeless Services, Energy and Weatherization, and Compliance staff also have access to the assessment online system in order to view submitted documents and reduce duplication in their document requests, often related to the Master Grant Agreement and Compliance and Monitoring processes.

This effort to reduce duplication and to provide additional hands-on training by the state is also designed to address feedback received through the ACSI Survey.

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

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

Rural and smaller agencies face difficulties in meeting all components required by Standard 2.2. This standard requires agencies to engage in stakeholder meetings, community forums and other information-gathering processes with four required sectors. This can be burdensome for agencies with limited resources and staff capacity. The state will allow this standard to be optional for agencies with an annual budget below \$15 million dollars. The agencies that this affects are: ACCESS, CAPECO, CAT, CCNO, CCSSD, CiNA, KLCAS, MCCAC, ORCCA, YCAP and OHDC.

6.6 **Performance Target: What percentage of eligible entities in the State does the State expect will meet all the State-adopted organizational standards in the next year?** 70%

**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

**Does the State statutory or regulatory authority specify the terms or formula for allocating the 90 percent funds among eligible entities?** Yes

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

Below are the anticipated allocation amounts for FFY 2018. These amounts are based on receiving the same annual allocation as received in FFY 2017, which represents a decrease from FFY 2016. These projected allocations also represent an allocation formula data update, as is incorporated every two years or on the biennium.

Agency	Amount
ACCESS	\$292,188
CAO	\$403,463
CAPECO	\$150,000
CAT	\$150,000
CCNO	\$150,000
CCSSD	\$265,444

CinA	\$150,000
CSC	\$349,091
KLCAS	\$150,000
LANE	\$458,339
MCCAC	\$150,000
Mult Co	\$829,441
MWVCAA	\$503,510
NImpact	\$288,798
ORCCA	\$150,000
UCAN	\$321,777
YCAP	\$150,000
OHDC	\$150,000

**Planned CSBG 90 Percent Funds**

**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).**

As the designated lead agency, OHCS receives an award letter from the Department of Health and Human Services (HHS) representing the CSBG Allocation made available under Public Law 112-10. Award letters are received at the OHCS offices in both paper and electronic form.

Once the CSBG Award Letter is received:

- The original award letter goes to the Grants Manager in the Finance Management Department.
- A pdf. version is emailed to the Program Analyst assigned to CSBG.
- Ninety percent is pass-thru funding to the agencies, five percent is discretionary, and five percent is admin for the State.
- The Program Analyst, using the current funding formula, processes the award to determine the allocation for the 18 eligible entities. Administration and program amounts are determined by each agency’s CSBG budget. (7 days )
- Once processed, the CSBG Program Coordinator creates a Notice of Allocation, submits to the Finance department and funds are available to agencies through the OPUS database system. (7 days)

- A copy of the award letter and spread sheet of the allocation break-down per agency is electronically filed with all other CSBG documents on the agency's server.

In the event of unexpected increases or decreases, OHCS, in agreements made with the CAA network, takes the following approaches:

- a. Floor amount is \$150,000. If there is an increase in future CSBG funding, the total increase amount, beyond the prior year's allocation, will be allocated equally to all agencies, unless the increase is above 6%. In cases where the increase is greater than 6%, the first 6% will be distributed equally among all agencies, while the remaining amount above 6% will be allocated to the formula agencies by formula percentage.
- b. If there is a decrease in future CSBG funding, and a formula agency sees a decrease higher than 10% of the year's prior allocation, discretionary funds may be utilized to mitigate the decrease and make up the difference. Floor agencies will remain at \$150,000 and not see a decrease.
- c. In the event that the discretionary resources are not sufficient to cover all increases over 10%, the issue will be brought to the CSBG Workgroup for discussion and recommendations consideration.

**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? No**

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

Notices of Allocations (NOAs) are not allocated to the eligible entities until January. CSBG funds are issued and expended on the calendar year. The grant period on the NOA is January – December. Depending on when the first quarter award is received, the first quarter award may not be issued within 30 days. When the calendar year covers a biennium, unexpended CSBG funds must be de-allocated from the existing biennium and re-allocated to the new biennium. If there are unexpended funds at the end of the calendar year, CSBG funds are extended or rolled from the existing calendar year through March 31st of the New Year.

At times, the allocation guidelines do not address all conditions. In this event, OHCS seeks recommendations from the CAA network through the state association, CAPO. In this situation, OHCS may be unable to meet the 30-day timeline however OHSC is expedient in issuing the CSBG funds, once an additional agreement has been met.

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



As described in the 2017 State Plan, OHCS surveyed the CAA network to garner feedback on the entire system, including:

- Program Elements language
- MGA contract language
- Ease of submission
- Timeliness of approvals
- Usability of documents (worksheets, applications, etc.)
- Gatekeeper processes

Upon review of those results, the Homeless Services Section (inclusive of CSBG program) formed an MGA Improvement workgroup. Results of the workgroup, in preparation for the 2017-2019 Biennium MGA Process, included:

- Simpler submission process
- Limited use of gatekeeper process and more direct communication with program staff
- Consolidated applications and universal formatting, where applicable
- Transparency in communications regarding approval deadlines and wait times
- Additional communications throughout the process
- Revised applications
- Updated manuals

Included in this work was a revision of the CSBG work plan application to more closely align to the intention of a community action plan. CSBG subgrantees are asked to provide additional information regarding: plans to transition persons out of poverty, linkages and partnerships, service areas and service agreements, as well as more targeted community needs assessments data. Improvements of the work plan application also addressed areas for improvement noted in the ACSI survey. The additional requested information will allow the state to be more informed of key implementation components and able to identify concerns or issues prior to funding application approval. These major improvements will be kept for this time period, and reviews for any additional changes will occur in preparation for the 2019-2021 Biennium MGA Process. This process will include the solicitation of feedback from the CAA Network.

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

- 7.6 What amount of State CSBG funds does the State plan to allocate for administrative activities, under this State Plan? The estimate may be in dollars or a percentage. 5%**
- 7.7 How many State staff positions will be funded in whole or in part with CSBG funds under this State Plan? 15**
- 7.8 How many State Full Time Equivalents (FTEs) will be funded with CSBG funds under this State Plan? 2.5**

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

**7.9. Does the State have remainder/discretionary funds? Yes**

**Remainder / Discretionary Fund Uses: (projected amounts)**

1. Training and technical assistance to eligible entities – \$110,000
2. Statewide coordination and communication among eligible entities – \$70,400
3. Innovative programs/activities by eligible entities & special projects - \$35,600
4. Organizational Standards Assessment system - \$13,500
5. National Conference and/or other training fees for state CSBG staff: \$5,000
6. Support to floor agencies - \$45,000

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

- CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds) 9 eligible entities
- Other community-based organizations
- State Community Action association
- Regional CSBG technical assistance provider(s)
- National technical assistance provider(s)
- Individual consultant(s)
- Tribes and Tribal Organizations
- Other
- None (the State will carry out activities directly)

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

State usage of the discretionary funds is consistent with past years, in which a majority of the funding is utilized to fund Training and Technical Assistance for eligible entities and support of the state association. A secondary usage that has emerged is mitigating funding reductions within the floor agencies’ funding cycle, in addition to mitigating a percentage decrease over 10% for any qualifying formula agency. In advance of the 2017 funding cycle, OHCS and the CSBG Workgroup determined policy to ensure the mitigating funds for floor agencies are distributed at the start of the funding year. OHCS will continue with this practice in the 2018 fiscal year.

An addition to the priorities is funding for state staff to attend CSBG-related conferences and trainings. Feedback received by the community action agencies indicated the desire for state staff to represent the state and network at more trainings and conferences than there are

currently resources for. The additional discretionary funding support would allow CSBG staff to be present and engaged in important discussions related to potential funding cuts, new initiatives, and other CSBG-related issues that are part of the national CSBG dialogue where it is important to have each state’s voice represented.

## **SECTION 8**

### State Training and Technical Assistance

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

<b>Timeframe</b>	<b>Type</b>	<b>Topic</b>
TBD	Training	ROMA: Implementer
Multiple Quarters	Technical Assistance	ROMA: IS Survey (Annual Report)
Multiple Quarters	Training	Family Development
TBD	Training	OMB Fiscal
TBD	Training and Technical Assistance	State Administrative Fiscal
Multiple Quarters	Training and Technical Assistance	Organizational Standards
TBD	Training	Assertive Engagement
Multiple Quarters	Training	Board of Directors Development
Multiple Quarters	Training and Technical Assistance	Futures Project and Data Collection Improvement

**The planned budget for the training and technical assistance plan (as indicated in the Remainder/Discretionary Funds table in item 7.9):** - projected \$110,000

**8.2 Does the State have in place Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs) for all eligible entities with unmet organizational standards, if appropriate? Yes**

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

- CSBG eligible entities
- 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

OHCS partners closely with our community action state association, Community Action Partnership of Oregon (CAPO), to provide training and technical assistance to the community action agency network. Annually, CAPO surveys the CAA network to determine agency training needs. Survey results, in addition to noting upcoming initiatives and trends, informs the annual work plan with OHCS.

In FFY2018, CAPO will work with local and regional experts to provide a majority of the trainings, but will likely utilize national trainers to provide training on OMB Fiscal Updates.

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

In comparison to past training and technical assistance plans, OHCS is enabling CAPO to have more flexibility in designing the training calendar. Often, the CAPO workplan is created prior to the start of the fiscal year with a list of stated planned trainings and costs. This often does not allow for flexibility to address emerging needs or respond to new initiatives, with adequate funding, in a timely manner. By providing funding for core CSBG-related trainings, as well as leaving room for flexibility for more to be added to the calendar as the fiscal year progresses, CAPO can adapt their training offerings and meet the needs of the community action agency network. The state is also collaborating with the state association to provide more hands-on, personalized training to assist agencies with Organizational Standards and Technical Assistance Plans (TAPs).

This year's training plan will also continue to include board development objectives. In 2017, OHCS funded a board development project that included local best practices workshops at select agencies, in addition to funding opportunities for board members to attend trainings and conferences. While we found that many board members were not able to attend non-local conferences and trainings, bringing trainers to them was a successful and appreciated endeavor.

In FFY 2018, we will continue to offer this to the agencies that were not part of this first cycle of hands-on expert training and consultation.

## SECTION 9

### State Linkages and Communication

**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.**

- 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

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

The statewide network of CAAs is the statewide system for delivery of anti-poverty services, including the Community Services Block Grant (CSBG). CAAs work extensively with governmental entities, nonprofits, mental and physical health providers, schools, public safety providers, and others to design, implement, and deliver programs and services to low-income individuals and families.

Community Action Agencies provide information and referrals to the public and are key participants in their respective Continuums of Care, which enables them to be a community hub for linking low-income people to mainstream supportive services. CAAs maintain partnerships with systems of care to ensure coordination, and to avoid duplication of services.

The Department of Human Services (DHS) uses TANF funds to address crisis and short-term needs that put low-income families with children at risk of becoming homeless. OHCS partners with DHS in this effort, and works to strengthen and expand this program as well as replicate similar partnerships with other state departments.

Oregon Continuums of Care are designing and implementing a coordinated entry process. The tool works to access both visible and hidden barriers. Reaching across disciplines increases the possibility of touching upon a cross section of life skills support, substance and or alcohol abuse treatment, anger management, counseling, and other areas that may help a person maintain housing stability. <sup>4</sup> As providers of OHCS homeless funded programs, the CAA network plays a critical role in the operations of their regional or balance of state COC including leadership as a COC lead in five of the seven Continuums.

In 2015, the Oregon Legislature approved an expansion of the Housing Council<sup>5</sup> to become the Oregon Housing Stability Council and include additional members to enhance coordination between public and private housing and social service agencies. The Housing Stability Council and the Community Action Partnership of Oregon are key networks that work to ensure a statewide continuum of housing and services for low income households, people experiencing homelessness, and special needs populations. The Housing Stability Council consists of seven members appointed by the Governor, subject to confirmation by the Senate under ORS 171.562 and 171.565. These members include representatives from many sectors including: rural development, county commissioner, finance and lending, community action, mental health, county government, and housing authority.

## Eligible Entity Linkages and Coordination

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

The state requires eligible entities to complete a Community Action Plan application as part of the Master Grant Agreement process. Within this application, eligible entities are required to report on the following categories, which allows for the state to monitor their linkages and subsequent strategies, to assure the effective delivery of CSBG services to low-income people and communities. Required details regarding service area, county coverage and service delivery enables the state to cross-reference services in order to analyze and recognize the presence of duplication and determine whether that duplication is necessary to ensure a complete coverage of services for differing target populations. Required service categories include:

- Top 5 Needs and Gaps in Services, by county, as gathered by their Community Needs Assessments
- Strategies to address needs and gaps and coordinating partners

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<sup>4</sup> Oregon's 2016-2020 Consolidated Plan; p. 183

<sup>5</sup> Same as above

- Service area: poverty populations, services provided, CSBG-funded positions
- Linkages and Primary Referral Organizations
- Plan to Transition Out of Poverty
- Additional inter-agency anti-poverty programs and services provided
- Funding Services and Coordination: Primary Partnerships

In addition to the Master Grant Agreement process detailed above, eligible entities are required to report annually their partnerships and linkages in the CSBG IS Survey.

**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.**

Community Action agencies receiving CSBG Funding are required to submit a two-year Master Grant Agreement and CSBG Community Action Plan application. To receive funding, the community action plan must be approved by OHCS program analysts and managers.

The state assures agencies develop linkages to fill identified gaps in services by requiring agencies, in the plan, to identify their community gaps and needs, describe strategies to address these gaps and needs, and report on the coordinating partners they will work with to implement the identified strategies. In addition to these requirements, the agencies must also identify their primary referral organizations. These include, but are not limited to, other local nonprofits, local governments, educational institutions, businesses and religious entities. Further, agencies are asked to detail their referral processes, including the method of referral, description of services referred to, type of follow-up conducted and system used to receive enrollment and outcome data from the referral entity. Collectively, the CAA Network reported 6,198 organizational partnerships in the 2016 CSBG IS Survey.

**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**

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

In the economic development forums convened during development of OHCS’ Consolidated Plan, employers noted a lack of qualified workers with the communication skills, basic technical skills, and strong work ethic necessary for them to be successful in today’s job market. Throughout the state there was overwhelming support for a greater investment in a more strategic approach to career technical education.

In December 2011, Oregon’s Governor delivered a powerful charge to the Oregon Workforce Investment Board: transform the workforce development system to achieve better outcomes for Oregon’s businesses and for all Oregonians who can and want to work. The Governor’s charge was a call to action – to produce a highly-skilled workforce, to advance more people into family wage jobs, and to help Oregon businesses compete in a global economy. In response, and in order to achieve the Governor’s vision, the Oregon Workforce Investment Board developed Oregon’s new workforce strategic plan, Oregon at Work. This effort is in alignment with OBDD’s strategic plan reflected in the non-housing community development priorities in the Consolidated Plan.

Also in 2011, the Oregon Education Investment Board was created to build a unified system for investing in and delivering public education from birth to college and career. This board is chaired by Governor Kate Brown and is one of many strategies to ensure students are prepared for the economy of the future. The economic development efforts of the State remain closely related to the work of the Governor’s Regional Solutions Teams, which include representatives from state agencies who work directly with Oregon communities in 11 regions across the state.

Under the Governor’s Executive Order No. 11-12, the state is establishing infrastructure to support communities through collaborative governance systems. Collaborative infrastructure includes resources to support collaborative decision making; dispute resolution; implementation; public engagement and interagency cooperation. The Regional Solutions Program approaches community and economic development by recognizing the unique needs of each region in the state and working at the local level to identify priorities, solve problems, and seize opportunities to get specific projects completed. Leveraging all funding opportunities to address the highest regional priorities is necessary for sound and long-term economic growth. To grow Oregon’s economy and create jobs, all resources in the community – public, private, and civic – must join forces to shape the state’s future and to successfully accelerate and complete on-the-ground projects.<sup>6</sup>

Oregon’s community action agencies utilize CSBG funds to assist community members in establishing the framework for employment and educational opportunities. In 2016, eligible entities utilized \$85,029 for employment assistance – an increase from the previous year - and \$139,281 for educational assistance.

**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).**

Community action agencies in Oregon are the primary delivery mechanisms for Oregon Housing and Community Services programs to low-income Oregonians. The history of coordination of the CSBG, LIHEAP, and Weatherization programs has provided a model that we will continue to strengthen. At this time our CAAs also coordinate other low-income grants such as food, childcare assistance and other programs offered through various funders including other state

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<sup>6</sup> Oregon’s 2016-2020 Consolidated Plan; p. 114-115



agencies. State statute and Oregon Housing and Community Services policy will have CAAs continue in that role.

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

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

Community action agencies agree to assurances through the Master Grant Agreement process. The community action plan application requires agencies to detail partnerships, both in providing services and funding coordination. The agencies are also required to submit partnership information annually through the CSBG IS-Survey. The community action agency network is the state delivery system for homeless services. In this capacity CAAs are required to participate in their homeless Continuum of Care which is comprised of multiple organizations including faith-based, charitable groups, low income representatives and other community and state organizations. In 2016, the CAA Network reported a total of 6,198 organizational partnerships, including 570 faith-based and 1,479 nonprofit.

**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.**

Oregon's eligible entities coordinate with multiple public and private resources to support anti-poverty, homeless and housing services. The Oregon community action agencies report annually on their public and private resources in the CSBG IS-Survey. In 2016, the eligible entities received \$40,933,475 in public resources and \$53,104,808 in private resources.

**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.**

OHCS works in close collaboration with the state association, Community Action Partnership of Oregon (CAPO) and annually provides CSBG funds for CAPO operations and statewide services. CAPO's board of directors is comprised of executive directors from the Oregon community action agency network. In addition to being a legislatively-required advisory partner to OHCS, CAPO provides technical and training assistance to the CAA Network, as agreed upon in an annual work plan agreement with OHCS. The CAA network also has representation on the Housing Stability Council which is the department's governing policy body.

In addition to mobilizing community action agencies across the state of Oregon, CAPO is the primary technical and training assistance provider utilized by OHCS for the CSBG eligible entities. CAPO hosts a website resource center for CSBG-related topics, advocates on behalf of the community action agencies and regularly sends CSBG and community action related newsletters to its member network.

OHCS provides funding to assist CAPO in working regionally with other states, including Washington and Idaho. Through these partnerships, CAPO is able to coordinate special projects like the Futures Project. The Futures Project's goal is to develop key indicators to demonstrate the impact Community Action Agencies have on stabilizing and equipping low income individuals to exit poverty, as well as improving data collection and analysis to better target programs to reach their intended outcomes.

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

OHCS and CAPO, in collaboration with the CAA Network, utilize a communication agreement as described below:

##### **OHCS Protocol for Communications to CAPO and Community Action Agencies:**

We believe that the work OHCS and CAPO does together makes Oregon a better place. The more collaboratively our organizations work, and the more efficiently we communicate, the better service we provide to our communities. To that end, we utilize the following "Communication Protocol" between the two organizations in the name of better service to the state.

##### **Services Impacted by This Protocol:**

These are the program areas and funding streams that necessitate 'early' conversations between OHCS and CAPO leadership when policy changes or funding changes are being contemplated:

- Energy Programs: Low-Income Home Energy Assistance Program (LIHEAP), Energy Conservation Helping Oregonians Program (ECHO), Weatherization, Oregon Energy Assistance Program (OEAP), Department of Energy and Weatherization.
- Homeless Programs: Emergency Housing Assistance (EHA), State Homeless Assistance Program (SHAP), Emergency Solutions Grant (ESG) and other federal homeless funds
- Community Services Block Grant (CSBG).

##### **Events that will necessitate use of the protocol:**

- Implementation of policy or funding changes to the programs when mandated by
  - Federal rule or federal legislation or other federal action
  - State Legislation
  - Executive order
- Contemplated program changes of the following nature:
  - OARs
  - Program Manuals
  - Funding formulas
  - Master Grant Agreements
  - Legislative Proposals
- Systemic program issues
  - Example: one CAA reports a problem with program implementation, and other CAAs report the same problem. This should be taken up by CAPO and OHCS leadership to work toward resolution.

- This does not in any way preclude individual agencies from communicating with OHCS about their individual program issues. This is an effort to speed resolution.

**Format of communication**

- When notified of an event listed above, CAPO will develop an official position, and CAPO leadership will deliver it to OHCS leadership either in written form or through a meeting.
- CAPO Board meetings are not a ‘feedback’ mechanism but an update mechanism. Discussing an issue or change with the CAPO Board does not constitute receiving CAPO advice.
- Surveying CAAs does not constitute as receiving CAPO advice.

**Points of contact for each entity:**

- CAPO Executive Director and Board Chair
- OHCS Director, Assistant Program Directors and Assistant Director of Public Affairs

**What happens after a decision has been made:**

- Once OHCS has made an agreement with CAPO, should an OHCS staff member’s action not reflect that agreement, CAPO members will refer the issue to CAPO leadership who will then bring the matter to OHCS leadership’s attention.
- Once CAPO has made an agreement with OHCS, should CAPO member dissent they will do so on behalf of their CAA, not as a representative of CAPO (i.e. CAPO’s position will remain intact).

**Frequency:** As necessary and as issues or news and updates arise.

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

In order to respond appropriately to State Accountability Measure 5S(iii), OHCS will utilize the Communication Agreement plan to provide feedback to local entities in cases where the feedback is statewide and generalized. In instances where the feedback is isolated to individual agencies, OHCS will initiate direct contact with the community action agency (ies) within 60 days. However, to honor our commitment to CAPO as an advisory body, and to take advantage of their expertise, OHCS will notify CAPO of impending communications. Regarding the state’s performance on state accountability measures, the state will also coordinate with CAPO to share and discuss relevant results and feedback.

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

The Communication Plan has proven effective for OHCS communications with CAPO and the CAA Network. This plan is utilized often and OHCS and partners will continue to use it to guide our communications. Also, the addition of a CAPO CSBG standing committee provides an additional vehicle for communication, particularly when seeking specific feedback on CSBG-related items.

In response to feedback received from the ACSI Survey and the MGA Surveys, the state has made concerted efforts to engage the CAA Network more frequently to communicate regular program updates, particularly in topics of homeless programming and data collection. This has resulted in regular in-person meetings with CAA program staff. During these meetings, staff share updates, answer questions and provide networking opportunities. This has been well received and will continue as a regular practice to increase communication, transparency and partnership.

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

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

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

<b>CSBG Eligible Entity</b>	<b>Review Type</b>	<b>Target Date</b>
YCAP	Full onsite	December 2017
MWVCAA	Full onsite	January 2018
OHDC	Full onsite	February 2018
CAPECO	Full onsite	March 2018
CCSSD	Full onsite	April 2018
CiNA	Full onsite	May 2018

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

See Appendix – Item C: Program Compliance Monitoring Procedures and OHCS Program Guide.

- 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?**

Initial Monitoring reports are provided within 60 days of the monitoring visit.

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

**10.4 Closing Findings: Are State procedures for addressing eligible entity findings/deficiencies, and the documenting of closure of findings included in the State monitoring protocols attached above?** Yes

**10.5 Quality Improvement Plans (QIPs): How many eligible entities are currently on Quality Improvement Plans?**

There are currently no eligible entities on Quality Improvement Plans.

**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?**

In the event a community action agency has serious deficiencies to be addressed through a Quality Improvement Plan, the state will draft a report, within 30 days of the approval of the QIP, and submit to the Office of Community Services coordinator assigned to OHCS. This report will include: agency name, listed deficiencies, timeframe for improvement and approved action plan.

**10.7 Assurance on Funding Reduction or Termination: Does the State assure, according to Section 676(b)(8), that “any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b).”** Yes

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

**10.8. Does the State CSBG statute and/or regulations provide for the designation of new eligible entities?** Yes

**OAR 813-230-0010**

**Designation of Community Action Agencies**

(1) CAAs established under the Economic Opportunity Act of 1964 or the direct successor to such CAAs, have been recognized by the department as designated CAAs for established service areas.

(2) Agencies eligible for recognition as a CAA are political subdivisions of the state; private, nonprofit community organizations and migrant/seasonal farm worker organizations. An

applicant agency must demonstrate its programmatic and administrative capabilities for implementing and operating anti-poverty programs and must be able to document that the agency service area has a population of a least 50,000 individuals.

(3) New CAAs will be designated by the department for unserved areas of the state only if CAAs contiguous with or closest to the unserved areas decline to serve such areas.

(4) Except in situations where an agency's status as a CAA is terminated voluntarily or involuntarily, changes in service area designations shall be initiated at the local level and submitted to the department for review and approval or disapproval.

(5) Efforts to establish new CAAs in unserved areas of the state shall be initiated at the local level and submitted to the department for review and approval or disapproval.

Stat. Auth.: ORS 184.082 & 458.505-515

Stats. Implemented: ORS 458.505-515

**10.9 Does the State CSBG statute and/or regulations provide for de-designation of eligible entities?**

Yes

In the event an eligible entity was to undergo a de-designation, the state would comply with the following process for designation as stated in the CSBG Oregon Administrative Rule 813-230-0010.

**OAR 813-230-0020**

**Termination of Community Action Agencies**

(1) A CAA shall not be terminated by the state of Oregon unless, and after notice and opportunity for hearing, it has been determined that cause existed for termination.

(2) Such notice shall be sent to a CAA by the department and a hearing shall be held before the assistant director when in his or her opinion probable cause for termination exists.

(3) A CAA may appeal the assistant director's decision to the director for hearing on the record.

(4) A CAA may appeal the director's decision to the governor for hearing on the record.

(5) The decision to terminate a CAA will be transmitted to the Secretary for the U.S. Department of Health and Human Services for review within ten working days of that decision being finalized.

Stat. Auth.: ORS 184.082 & 458.505-515

Stats. Implemented: ORS 458.505-515

**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**

In the event an eligible entity was to undergo a re-designation, the state would comply with the following process for designation as stated in the CSBG Oregon Administrative Rule 813-230-0010.

### **Designation of Community Action Agencies**

(1) CAAs established under the Economic Opportunity Act of 1964 or the direct successor to such CAAs, have been recognized by the department as designated CAAs for established service areas.

(2) Agencies eligible for recognition as a CAA are political subdivisions of the state; private, nonprofit community organizations and migrant/seasonal farm worker organizations. An applicant agency must demonstrate its programmatic and administrative capabilities for implementing and operating anti-poverty programs and must be able to document that the agency service area has a population of a least 50,000 individuals.

(3) New CAAs will be designated by the department for unserved areas of the state only if CAAs contiguous with or closest to the unserved areas decline to serve such areas.

(4) Except in situations where an agency's status as a CAA is terminated voluntarily or involuntarily, changes in service area designations shall be initiated at the local level and submitted to the department for review and approval or disapproval.

(5) Efforts to establish new CAAs in unserved areas of the state shall be initiated at the local level and submitted to the department for review and approval or disapproval.

Stat. Auth.: ORS 184.082 & 458.505-515

Stats. Implemented: ORS 458.505-515

### **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).**

All transactions must be supported by appropriate documentation. The same documentation requirements apply to transactions entered directly into SFMA, as well as those initially entered and processed in an agency subsystem that are transmitted to SFMA through an automated interface. In all cases, the documentation must be complete and accurate and must allow a transaction to be traced from the source documentation, through its processing, to the financial reports. All documentation should be readily available for examination.

**10.12 Single Audit Management Decisions: Describe State procedures for issuing management decisions for eligible entity single audits, as required by Block Grant regulations applicable to CSBG at 45 CFR 75.521. If these procedures are described in the State monitoring protocols attached under item 10.2, indicate the page number.**

When an audit finding in the subrecipient single audit report pertains to a federal award, the contributing agency is required to issue a management decision within six months of receiving the report. In the management decision, the contributing agency should clearly state whether or not it supports the audit finding, the reasons for the decision and the expected subrecipient action to repay disallowed costs, make financial adjustments or take other action. If the corrective action has not been completed, the contributing agency should include a timetable

for completion. The contributing agency may request additional information or documentation from the subrecipient, including auditor assurance related to the documentation. The management decision should describe any appeal process available to the subrecipient. If an audit finding affects programs of more than one agency, the audit agency is responsible for coordinating the management decision for all affected agencies.

**10.13 Assurance on Federal Investigations: Will the State “permit and cooperate with Federal investigations undertaken in accordance with Section 678D” of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act? Yes**

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

The state is not making any significant adjustments to the monitoring procedures. In the previous year, the state made steps to recognize the burden that duplicate processes and document requests, among the various monitoring practices, place on the community action agencies. The review of an organization’s practices, and thus the complete monitoring cycle, occurs several times throughout the year, or in the case of funding applications, biannually:

- Master Grant Agreement Process
- Community Action Plan application
- Fiscal onsite review
- Program Compliance onsite review
- Organizational Standards Assessment

In an effort to establish more efficient coordination between the monitoring practices, OHCS staff reviewed all components of each process. OHCS found that sufficient overlap existed between the monitoring practices, partially due to increased requirements. In many cases, each process was reviewing the same documentation for similar or identical requirements. With this clearer picture of opportunities for reducing duplication, OHCS has tightened the processes, increased communication between monitoring staff, eliminated overlap when applicable and distributed a monitoring flow chart guide to agencies, to inform them of the total cycle and what the expectations are within each monitoring process. OHCS will continue with these improved processes in FFY 2018.



## SECTION 11

### Eligible Entity Tripartite Board

**11.1 Which of the following measures are taken to ensure that the State verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B of the CSBG Act? [Check all that apply]**

- Attend Board meetings
- Review copies of Board meeting minutes
- Track Board vacancies/composition
- Other

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

- Annually
- Semiannually
- Quarterly
- Monthly
- Other

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

The eighteen eligible entities are monitored by program compliance staff at a minimum once every three years. They are fiscally monitored annually. Additionally, the agencies complete a Master Grant Agreement application process every two years. The CSBG Workplan language includes a provision that an agency should submit an updated Board of Directors roster to OHCS within 5 days of election. With the implementation of Organizational Standards, agencies are monitored for organizational operations and practices annually. While many duplicate requests across these processes have been removed or streamlined, board rosters remain a document that is checked during each of these processes. Because board membership can change, it is important we are always provided with the most recent copy. Therefore, during each of these processes, the agencies must submit the following for review:

- Board of Directors roster
- Board of Directors bylaws

Board of Directors bylaws are evaluated for stated tripartite requirements, including adequate representation and democratic election of board members.

In the event that a complaint against representation has been filed with a community action agency, and the complaint is not resolved at the local level, OHCS has the right to review the complaint, the policy and the actions taken towards resolution. OHCS will work with the agency to ensure the issue is resolved satisfactorily and by agency policy.

- 11.4 Does the State permit public eligible entities to use, as an alternative to a Tripartite Board, “another mechanism specified by the State to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs” as allowed under Section 676B(b)(2) of the CSBG Act. No**

## Section 12

### Individual and Community Income Eligibility Requirements

- 12.1 Required Income Eligibility: What is the income eligibility threshold for services in the State? [Check one item below.]**

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

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

Income is used to ensure that participants do not exceed 125% of the Federal Poverty Level. Income eligibility is factored on all household income before any deduction (gross income) and the number of household members. Households must provide documentation of their gross income for the eligibility period. Household income is determined at the time of initial application and upon recertification. Proof of household income documentation includes, (but not limited to):

- Check stubs
- Award Letters
- Computer print-outs from DHS, Employment Office, SS Office
- Accessing DHS database (FCAS screen)
- Bank statements
- Copies of checks
- Letters from employers
- Self-employment records

Once household income has been determined, reference to current Federal Poverty Guidelines determines if the household is income eligible based on their household size. For participants with zero income: Eligible entities should use a form for self-declaration.

Within the Master Grant Agreement process each eligible entity is required to report how often they re-certify a participant's income (quarterly, annually, or bi-annually).

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

Eligibility determinations must be documented in client files and preferably through third-party documentation. In the event that a client seeking services is unable to provide documentation due to emergency and/or crisis situation, a client may self-certify. Income verification procedures and client file accuracy are reviewed during on-site monitoring visits by OHCS program compliance monitoring staff.

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

The state ensures eligible entities' development practices target and benefit low-income communities through the review of:

- Master Grant Agreement
- Community Action Plan application
- Community Needs Assessment
- National Performance Indicators
- ROMA results of CSBG IS-Survey

## **SECTION 13**

### Results Oriented Management and Accountability (ROMA) System

**13.1 ROMA Participation: In which performance measurement system will the State and all eligible entities participate, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act? [Check one]**

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

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

OHCS requires eligible entities to adhere to and submit information on ROMA goals through the Master Grant Agreement process.

Example language from Master Grant Agreement:

A. SUBGRANTEE shall, and shall cause and shall require its SUBRECIPIENTS by contract to assure that data collection and reporting for CSBG funded activities be conducted through the use of OHCS approved HMIS and OPUS management information systems. SUBGRANTEE shall, and shall cause and require its SUBRECIPIENTS to assure that data entry into HMIS and OPUS occur in an accurate and timely manner as satisfactory to OHCS.

B. SUBGRANTEE shall, and shall cause and shall require its SUBRECIPIENTS by contract to submit to the satisfaction of OHCS all reports as required in the Master Grant Agreement including the:

- 1) Annual submission of the CSBG IS report, by date determined by OHCS.

Prior to the start of each CSBG IS-Survey data collection period, training materials and instruction guides, created by NASCSP, are sent to each eligible entity. In addition, agencies have an opportunity to send staff to multiple ROMA workshops that are offered around the state as part of the technical and training assistance provided by the state association.

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

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

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

Eligible entities agree to participate in ROMA and report NPIs as part of the Master Grant Agreement process. In addition to the NPIs required as part of the CSBG IS Survey/Annual Report, OHCS will be implementing Futures Project Indicators in 2018. Agencies will be asked to report on all of the 43 Indicators that address services they provide in the “other” category within the CSBG IS Survey/Annual Report.

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

OHCS contracts with the Community Action Partnership (CAPO) to provide training and technical assistance to the eighteen eligible entities. CAPO provides the CAA Network with 2-3 ROMA trainings annually. Topics covered include History of ROMA, NPI Targeting and utilizing ROMA data for strategic planning and evaluation.

Additionally, CAPO assists OHCS with ROMA data collection and provides technical assistance during this process. OHCS also contracts with the City of Portland to maintain and update the Service Point data management system, to ensure that agencies are able to access data required for completion of the CSBG IS-Survey/Annual Report.

With the release of ROMA: Next Gen and Organizational Standards, OHCS has funded CAPO to provide ROMA Implementer trainings to ensure that each agency has access to staff who are knowledgeable in ROMA and can participate and advise during organizational processes such as workplan development, strategic planning and community needs assessments.

Implementation of The Futures Project will be led by members of the steering committee, consisting of regional representatives. Training and technical assistance webinars and trainings will be occurring Fall through Winter of 2017. Data analysts at the state, in conjunction with CAA representatives and a representative of the national data taskforce, are preparing data collection systems for seamless entry and reporting.

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

Agencies are required to submit the CSBG Annual Report, in addition to informing OHCS, during the Master Grant Agreement process and Community Action Plan application, of the presence of a ROMA trainer on staff and the ROMA expenditure categories under which their CSBG funds will be utilized. Within the Community Action Plan application, agencies are required to identify, when reporting services and strategies, the coordinating National Performance Indicators. This information provides OHCS the means to analyze and review the correlations between data collection and services provided.

The state also reviews the results of each agency's Community Needs Assessment to see the presence of data and how it is used to determine service delivery needs and target populations. Lastly, through the Organizational Standards, the state reviews whether analysis and discussion of data occurs within the agency and with the board, in order to ensure program adjustments are made if necessary.

**Community Action Plans and Needs Assessments**

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

Eligible entities are required to submit a CSBG Community Action Plan application as part of the Master Grant Agreement Process. Within this application, agencies are required to submit

information detailing their service area and poverty rates, strategies to address needs and gaps of services as determined by their most recent community needs, assessments, plans to transition out of poverty and linkages, in addition to further data that illustrates their plan to utilize CSBG funds to address poverty in their community.

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

Eligible entities are required to submit a CSBG Community Action Plan application as part of the Master Grant Agreement Process. Within this application, agencies are required to submit information detailing their service area and poverty rates. In addition, agencies must report their Top 5 Needs and Top 5 Service Gaps, as discovered through the community needs assessment process. Agencies must also address the strategies they will take to address the needs and gaps, as well as any coordinating partners involved in those efforts.

The agencies must also submit for review a community needs assessment as part of the Organizational Standards Assessment process. Within this process, agencies’ assessments will be reviewed for process, inclusion, methodology and content. An agency that fails to meet the standards for community needs assessments will be required to develop an action plan as part of a Technical Assistance Plan (TAP).

## **SECTION 14**

### **CSBG Programmatic Assurances and Information Narrative (Section 676(b) of the CSBG Act)**

**14.1 Use of Funds Supporting Local Activities**

***CSBG Services***

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

- (A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals--
  - (i) to remove obstacles and solve problems that block the achievement of self-sufficiency (particularly for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
  - (ii) to secure and retain meaningful employment;

- (iii) to attain an adequate education with particular attention toward improving literacy skills of the low-income families in the community, which may include family literacy initiatives;
- (iv) to make better use of available income;
- (v) to obtain and maintain adequate housing and a suitable living environment;
- (vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent individual and family needs;
- (vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to –
  - (I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and
  - (II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

The State assures use of CSBG funds to address required service activities through compliance with CSBG IS-Survey reporting and Oregon Administrative Rules. The CSBG OAR 813-210-0025 states:

**OAR 813-210-0025**

**Use of Program Funds**

- (1) A subgrantee agency may use program funds to implement different strategic approaches designed to reduce or eliminate one or more conditions that block the achievement of economic self-sufficiency for low-income households. Such strategies must have measurable and potentially major impact on the causes of poverty in communities in the service area where poverty is a particularly acute problem.
- (2) Program funds will be used for allowable program services and activities for eligible low-income households in compliance with program requirements. These services and activities may include, but are not limited to helping members of low-income households:
  - (a) Secure and retain meaningful employment;
  - (b) Attain an adequate education;
  - (c) Make better use of available income;
  - (d) Obtain and maintain adequate housing and a suitable living environment;
  - (e) Obtain emergency assistance through loans or grants to meet immediate and urgent individual and family needs, including the need for health services, nutritious food, housing and employment-related assistance;
  - (f) Remove obstacles and solve problems that block the achievement of self-sufficiency;
  - (g) Achieve greater participation in the affairs of the community; and
  - (h) Make effective use of other programs related to the purpose of this OAR chapter 813, division 210.

(3) A subgrantee agency may also use program funds for a variety of services and activities intended to reduce or eliminate poverty conditions in communities in the service area, including but not limited to:

- (a) Providing on an emergency basis for the provision of such supplies and services, nutritious foodstuffs, and related services as may be necessary to counteract conditions of starvation and malnutrition among the poor;
- (b) Coordinating and establishing linkages between government and other social service programs to assure the effective delivery of such services to low income households; and
- (c) Encouraging the participation of private sector entities in community efforts to ameliorate poverty in the service area.

Stat. Auth.: ORS 456.555 & 458.235

Stats. Implemented: ORS 458.210 - 458.240 & 458.505

### ***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;

Oregon Community Action Agencies have a variety of programs dedicated to supporting youth in their communities. Agencies are required to report on services to youth through the CSBG IS-Survey and identify and address the needs of youth in their communities through their comprehensive community needs assessments.

Community action agencies are required by CSBG Statute to conduct a community needs assessment every three years to determine the top service needs in their community. Assessments are reviewed during the Organizational Standards Assessment process, as well as the Master Grant Agreement and Community Action Plan application process. Within the application, agencies must report on the top needs and gaps in services in their community, as well as the strategies to address those needs. This provides the means for the OHCS CSBG analyst to review agencies’ services and whether they are addressing needs, including needs of youth, through either the agency’s services or a subrecipient to the agency. In 2016, Oregon CAAs utilized \$105,450 of CSBG Funds to support youth-based activities, an increase over the previous year.



***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)

Oregon Community Action Agencies partner with multiple organizations to effectively maximize the impact of CSBG funds. Agencies may provide funds to subrecipients who can provide additional specialized services or partner with state and local agencies to strengthen their response to poverty in their community. Insight into the needs of the community is gathered through community needs assessments and partnerships are reported annually in the CSBG IS-Survey. Strategies to address needs and gaps in services, as well as coordinating partners to do so, are required to be reported by agencies in the Master Grant Agreement process.

**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.”[No response; links to items 7.9 and 7.10.]**

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

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

***Eligible Entity Service Delivery System***

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

Oregon community action agencies set policies, design programs, and evaluate services intended to reduce or eliminate the causes and conditions of poverty.

Each agency utilizes a community-based needs assessment to target services based on local needs. Activities and services vary by agency, depending on the needs of the community, local resources, and the opportunities for collaboration and partnership with business, private non-profit organizations and state and local government. Currently Oregon has eighteen eligible entities which serve all thirty-six counties in the state.

Community Action Agencies in Oregon are the primary delivery mechanisms for Oregon Housing and Community Services’ programs to low-income Oregonians. Oregon Administrative Rules Chapter 813, Division 210 stipulates that federal anti-poverty funds, administered by OHCS, shall be distributed to established CAAs across the state. These funds include: rental assistance,

homeless services, low-income energy assistance, weatherization, CSBG and other anti-poverty funding as it becomes available to OHCS. These programs include:

Federal Funds:

- Community Services Block Grant
- Home Tenant-Based Assistance
- Emergency Solutions Grant
- Housing Stabilization Program
- Low Income Weatherization and Energy Assistance
- Low Income Weatherization Programs

Non-Federal Funds:

- Emergency Housing Assistance
- State Homeless Assistance Program
- Oregon Energy Assistance Program
- Energy Conservation Helping Oregonians (ECHO)
- Housing Choice Landlord Guarantee Program

Eligible entities in Oregon use the Community Services Block Grant for programs to assist low-income participants including the elderly poor. CAAs provide a broad range of services utilizing CSBG dollars. The following services, by category, are examples of some of the programs typically seen in our partner agencies:

- Employment - Links with Children, Adult and Family Services Division of Oregon's Department of Human Services to help stabilize individuals and families and provide job counseling and life skills training
- Economic Development - Training in money management, budgeting, and naturalization for immigrant populations
- Income Management - Tenant readiness training where many work with local and state landlord groups, to provide courses on how to be a good tenant, including improving credit ratings and paying rent, and household budgeting
- Housing Assistance - Farmworker assistance, tenant readiness training, case management housing assistance in partnership with other state service agencies
- Nutrition - Many of the CAAs provide food assistance
- Health - Prevention programs and emergency assistance (including pre-natal care and emergency dental assistance)
- Emergency Assistance - All sub-grantee work plan narratives contain a strategy for unforeseen emergencies. The Department also has several discretionary sources of funding for unexpected emergencies.
- Energy Assistance – All CSBG grantees provide energy assistance through the Low-Income Home Energy Assistance Program and state programs. The majority also provide Weatherization Assistance to low-income households.
- Linkages and Coordination with Other Local Entities - Coordination with Habitat for Humanity, religious organizations and other nonprofits to better coordinate

services. Examples of partnerships at the local level are with schools, churches, banks and landlord groups.

***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 follow up consultations.”**

[No response; links to 9.3b.]

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

**14.3c. 676(b)(3)(C) Describe how funds made available through grants made under 675C(a) will be coordinated with other public and private resources.” [No response; links to 9.7]**

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

**14.3d. 676(b)(3)(D) Describe “how the local entity will use the funds [made available under 675C(a)] to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting.”**

OHCS supports eligible entity usage of CSBG funds to develop innovative community and neighborhood-based initiatives. Oregon eligible entities currently devote a percentage of CSBG funds to providing innovative services to special populations, such as youth and seniors. Additionally, OHCS uses discretionary funds to support the state association’s delivery of innovation-based workshops and conferences.

**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.”**

All eligible entities directly provide emergency services and referrals to emergency services. Agencies’ ROMA goals are reviewed during the Master Grant Agreement and CSBG Community Action Plan application process to determine the type of services an agency provides. Community needs assessments are also reviewed to determine community needs and resources and ensure that a CAA’s funding application aligns with those needs and does not duplicate other resources in the community. Additionally, agencies that provide emergency services and nutrition services are monitored every three years, and monitoring visits include food sites and

nutrition programs, as appropriate and required. In 2016, agencies utilized \$704,335 of CSBG funds to provide emergency services in their communities.

#### **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.” [No response; links to 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.” [No response; links to 9.2 and 9.5]

#### **Federal Investigations**

- 14.7. 676(b)(7) Provide “an assurance that the State will permit and cooperate with Federal investigations undertaken in accordance with section 678D.” [No response; links to 10.13]

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

- 14.8. 676(b)(8) Provide “an assurance that any eligible entity in the State that received funding in the previous fiscal year through a community services block grant made under this subtitle will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b).” [No response; links to 10.7]

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

- 14.9. 676(b)(9) Describe how the State will assure “that the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations.” [No response; links to 9.6]

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

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

of the eligible entity to petition for adequate representation.” [No response; links to item 11.3]

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

**14.11. 676(b)(11) Provide “an assurance that the State will secure from each eligible entity in the State, as a condition to receipt of funding by the entity through a community services block grant made under this subtitle for a program, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs.” [No response; links to items 13.5 and 13.6]**

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

**14.12. 676(b)(12) Provide “an assurance that the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to section 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and [describe] outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization.” [No response; links to 13.1, 13.2, 13.3, and 13.4]**

**14.13. 676(b)(13) Provide “information describing how the State will carry out the assurances described in this section.” [No response for this item]**

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

**SECTION 15**

**Federal Certifications**

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

**15.1 Lobbying**

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

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

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

agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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

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

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

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

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

#### **15.2 Drug-Free Workplace Requirements**

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

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

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

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

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

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

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

volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

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

Alternate I. (Grantees Other Than Individuals)

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

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



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

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

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

Oregon Housing and Community Services  
725 Summer St NE Suite B | Salem OR 97301-1266

Alternate II. (Grantees Who Are Individuals)

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

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

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

**15.3 Debarment**

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

Primary Covered Transactions

Instructions for Certification

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

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

available to the Federal Government, the department or agency may terminate this transaction for cause or default.

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

Primary Covered Transactions

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

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

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
- (2) The certification in this clause is a material representation of fact upon which reliance was
- (3) placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
- (4) The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that

its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.

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

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

- (1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared

ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.

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

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

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

Public Law 103227, Part C Environmental Tobacco Smoke, also known as the Pro Children Act of 1994, requires that smoking not be permitted in any portion of any indoor routinely owned or leased or contracted for by an entity and used routinely or regularly for provision of health, day care, education, or library services to children under the age of 18, if the services are funded by Federal programs either directly or through State or local governments, by Federal grant, contract, loan, or loan guarantee. The law does not apply to children's services provided in private residences, facilities funded solely by Medicare or Medicaid funds, and portions of facilities used for inpatient drug or alcohol treatment. Failure to comply with the provisions of

the law may result in the imposition of a civil monetary penalty of up to \$1000 per day and/or the imposition of an administrative compliance order on the responsible entity by signing and submitting this application the applicant/grantee certifies that it will comply with the requirements of the Act.

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

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

APPENDIX

Item A: State Lead Agency Certification Letter *(to be attached)*

Item B: Public Hearing Notice & Minutes *(to be attached)*

Item C: Monitoring Procedures

### **Program Compliance Monitoring Procedures**

Agencies who receive funding through Oregon Housing & Community Services (OHCS) will be monitored for compliance with Federal, State and/or local requirements as stipulated in the OHCS Master Grant Agreement, Exhibit B, Standard Terms and Conditions.

The purpose of the monitoring is to ensure Subgrantees and their subrecipients comply with the terms of the MGA Agreement and that grant fund awards are used properly for authorized purposes.

#### **Frequency**

Depending on the type of funding and monitoring requirements attached to it, Agencies will be monitored annually, every three years, or more often depending on risk assessments.

#### **Notification**

An Agency's director will be contacted by email no later than 30 days prior to proposed monitoring date to inform agency of upcoming monitoring visit. Upon email confirmation that the proposed date is acceptable, OHCS will follow with an emailed confirmation letter, and any supplement information, to Agency director, and any program people identified in initial contact. Request will be made for Agency to provide list of all clients served with funds during target Fiscal Year.

#### **Desk Pre-Review**

An Agency's Master Grant Agreement and Addendums will be reviewed prior to the monitoring visit to obtain information on how funds are used. File audit selection will be made from the list of clients provided and number of files to audit is outlined below:

The minimum file sample will be 2 client files, per program source.	
Number of households served, per program	Number of files to audit, per program
100 or fewer	2 files, plus 1 for each 50 households over 50
101 - 600	5 files, plus 1 for each 100 households over 200
Over 600	9 files.

#### **On-Site Monitoring Visit**

OHCS will initially meet with staff involved in the monitoring and explain the intent and process of the visit. OHCS will conduct the monitoring visit using OHCS developed auditing forms. Monitoring forms will also be utilized to interview staff regarding overall agency policies and procedures.

The compliance officer will review each file to ensure that all program guidelines were followed appropriately. A program specific audit worksheet will be completed for each file reviewed which will



identify any deficiencies, notes needed to bring up in the exit interview, and compile information for the Monitoring Report.

OHCS will meet with staff for an exit review, and provide an overview of issues to be addressed in the Monitoring Report.

#### **Desk Monitoring**

The HOME Tenant Based Rent Assistance (HTBA) program must be monitored annually. OHCS will request Agency's to send client files electronically through OHCS's Webdoc system during years when site visits are not required for other programs.

#### **Monitoring Report**

Within 60 days after an on-site inspection, OHCS will endeavor to provide Subgrantee with a written report as to its findings from that inspection. OHCS may advise the Subgrantee of any corrective action that it deems appropriate based upon its monitoring activities or otherwise. The report will ask the subgrantee to respond with corrective actions to each deficiency with an estimated completion date attached to them and if necessary, include mandatory corrective action steps outlined by OHCS. Subgrantee shall timely satisfy such corrective actions required by OHCS.

#### **Risk-Based Analysis**

The Monitoring Report will include an overall rating definition. The overall rating is weighted as explained below. This rating may affect frequency of scheduled monitoring visits.

Agencies will be evaluated on their level of risk for waste, fraud, and abuse of funding sources. Those agencies identified as being "high-risk" should be reviewed. Risk factors such as the amount of funds received, history of complaints and/or program violations, length of time operating programs, length of time since last review, known turnover of director and/or key staff, and/or other applicable factors when formulating a risk assessment.

#### **Resolution**

OHCS may track and follow up with Subgrantee regarding the correction by Subgrantee of findings made or other corrective actions required in OHCS' monitoring of Subgrantee's performance under this Agreement. The tracking record developed by OHCS may include, without limitation: findings, corrective actions and deliverables, due dates, responsible parties, actions taken, and final resolution. Subgrantees shall resolve findings and other required corrective actions within the timeframes reasonably given by OHCS by written report or otherwise.

If the OHCS Compliance Officer determines, in its sole discretion, that Subgrantee has failed to comply timely with any material Obligation, including but not limited to any OHCS directive or term of a corrective action plan, the Compliance Officer will refer Agency to Program Manager to exercise any remedies available under the MGA, applicable law, or otherwise.

If follow up/corrective actions are required, the compliance officer will follow up directly with the subgrantee. The monitoring will not be closed until all follow up items/corrective actions are satisfactorily completed

#### **Review Closing**

Once all follow up/corrective actions are satisfactorily completed, a closing letter will be sent to the subgrantee and the monitoring review will be closed.