

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

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- 1.2e. Street Address **450 West State Street, 2<sup>nd</sup> Floor, Boise, Idaho, 83720-0036**
- 1.2f. City **Boise**
- 1.2g. State ID
- 1.2h. Zip Code **83720**
- 1.2i. Work Telephone Number and Extension (if applicable) **N/A**
- 1.2j. Fax Number **208-334-5817**
- 1.2k. Email Address **hailey.smith@dhw.idaho.gov**
- 1.2l. Lead Agency Website <http://www.healthandwelfare.idaho.gov>

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

- 1.3. **Designation Letter:** Attach the state’s official CSBG designation letter. A new designation letter is required if the chief executive officer of the state and/or designated agency has changed. **[Attach a document.]**
- 1.4. **CSBG Point of Contact:** Provide the following information in relation to the designated state CSBG point of contact. The state CSBG point of contact should be the person that will be the main point of contact for CSBG within the state.

Has information regarding to the state point of contact changed since the last submission of the state plan?  Yes  No

If yes, provide the date of change and select the fields that have been updated

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

1.4a. Agency Name **Idaho Department of Health and Welfare**

1.4b. Point of Contact Name

Name **Hailey Smith** Title **CAP Grant Program Manager**

1.4c. Street Address **450 West State Street, 2<sup>nd</sup> Floor**

1.4d. City **Boise**

1.4e. State ID

1.4f. Zip Code **83720**

1.4g. Office Telephone Number **208-334-5733**

1.4h. Fax Number **208-334-5817**

1.4i. Email Address **hailey.smith@dhw.idaho.gov**

1.4j. Agency Website <http://www.healthandwelfare.idaho.gov>

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

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

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

If yes, provide the date of change and select the fields that have been updated. **[Date Picker and Check all the apply]**

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

**1.5a.** Agency name **Community Action Partnership Association of Idaho**

**1.5b.** Executive Director or Point of Contact **[Narrative, 50 characters each]**

Name: **Wil Gehl**

Title: **CEO**

**1.5c.** Street Address **3350 W Americana Terrace, Suite 360**

**1.5d.** City **Boise**

**1.5e.** State ID

**1.5f.** Zip Code **83706**

**1.5g.** Telephone Number **208-375-7382**

**1.5h.** Fax Number **208-342-2078**

**1.5i.** Email Address **wgehl@capai.org**

**1.5j.** State Association Website <https://www.capai.org>

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

## Section 2 State Legislation and Regulation

- 2.1. **CSBG State Legislation:** State has a statute authorizing CSBG.  Yes  No
- 2.2. **CSBG State Regulation:** State has regulations for CSBG.  Yes  No
- 2.3. **Legislation/Regulation Document:** Attach the legislation and/or regulations or provide a hyperlink(s) to the documents indicated under Items 2.1. and/or Item 2.2.

**Links to Idaho CSBG authorizing statute:**

<http://legislature.idaho.gov/statutesrules/idstat/Title56/T56CH2/SECT56-202/>

<http://legislature.idaho.gov/statutesrules/idstat/Title56/T56CH2/SECT56-203/>

**Link to Rules governing the Idaho CSBG Program:**

<https://adminrules.idaho.gov/rules/current/16/160410.pdf>

- 2.4. **State Authority:** Select a response for each of the following items about the state statute and/or regulations authorizing CSBG:
- 2.4a. **Authorizing Legislation:** State legislature enacts authorizing legislation or amendments to an existing authorizing statute last federal fiscal year.  Yes  No
- 2.4b. **Regulation Amendments:** State established or amended regulations for CSBG last federal fiscal year.  Yes  No
- 2.4c. **Designation:** State statutory or regulatory authority designates the bureau, division, or office in the state government that is to be the state administering agency.  Yes  No

## Section 3 State Plan Development and Statewide Goals

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

**The Idaho Department of Health and Welfare (Department) Mission Statement is “To promote and protect the health and safety of Idahoans.”**

**The goals and objectives of the Department are to:**

- **Improve the health status of Idahoans;**
- **Increase the safety and self-sufficiency of individuals and families; and**
- **Enhance the delivery of health and human services.**

**The Department’s responsibilities are defined in Sections 56-202 and 56-203 of Idaho Code, which authorize the Department to enter into contracts with the federal government to carry out the purposes of the Community Services Block Grant Act, 42 USC 9901, *et seq* (the Act).**

**It is the responsibility of the Department to ensure all applicable federal requirements are met and the administrative requirements of CSBG are clear and uniform. The Department retains all authority in the administration and implementation of CSBG**

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

**The overarching purpose of the Department’s CSBG Program is to: provide assistance to low-income Idahoans through a network of community action agencies and other community-based organizations; reduce poverty; revitalize low-income communities; and empower low-income individuals and families to achieve stability and engage in their community.**

**The Department’s CSBG Program priorities are established through locally driven community needs assessments and community planning efforts. To assist eligible entities in delivering these services and maximizing CSBG impact, the Department will pass through no less than 90% of Idaho’s CSBG allocation to the CSBG eligible entities.**

**The Department strives to employ, at a minimum, one certified ROMA implementor at each eligible entity and continues to develop a cohort of ROMA implementors and trainers throughout the state. All CSBG funded eligible entity programs will be managed to meet the six national ROMA Goals:**

1. Low-income people become more self-sufficient.
2. The conditions in which low-income people live are improved.
3. Low-income people own a stake in their community.
4. Partnerships among supporters and providers of services to low-income people are achieved.
5. Agencies increase their capacity to achieve results.
6. Low-income people, especially vulnerable populations, achieve their potential by strengthening family and other supportive systems.

Also, to ensure accountability among the seven geographical service regions for the state, Idaho will support eligible entities in meeting all organizational standards by implementing agency-specific tools to track and maintain documents needed to support all Organizational Standards.

In order to facilitate service delivery and coordinate with other services, the Department is electing to use up to 5% of Idaho’s CSBG allocation for discretionary funding to support the following priorities:

1. Statewide community action database to track services, outcomes, and participant characteristics;
2. Idaho/Washington/Oregon Regional Futures Project.

No more than 5% of Idaho’s CSBG allocation will be spent on administration.

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

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

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

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

- State Performance Indicators and/or National Performance Indicators (NPIs)
- U.S. Census data
- State performance management data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)
- Monitoring Visits/Assessments
- Tools not identified above (specify) **[Narrative, 500 characters]**

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

- Eligible entity community needs assessments
- Eligible entity community action plans
- Public Hearings/Workshops

- Tools not identified above (e.g., state required reports) [specify] **[Narrative, 500 characters]**

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

- Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)
- State Association
- National Association for State Community Services Programs (NASCSPP)
- Community Action Partnership (The Partnership)
- Community Action Program Legal Services (CAPLAW)
- CSBG Tribal Training and Technical Assistance (T/TA) provider
- Regional Performance Innovation Consortium (RPIC)
- Association for Nationally Certified ROMA Trainers (ANCRT)
- Federal CSBG Office
- Organizations not identified above (specify) **[Narrative, 500 characters]**

**3.4. Eligible Entity Involvement**

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

**The Department has historically involved eligible entities in the development of the CSBG State Plan. The following steps were taken to develop the 2020 and 2021 CSBG State Plan:**

- 1. In May 2019, the Department convened a meeting of the eligible entities and CAPAI (state association) to discuss plan development. The draft model State Plan was presented and discussed with the eligible entities at that time.**
- 2. The Department considered eligible entities' CAP Plans and Community Needs Assessments Plans and finalized the draft model State Plan.**
- 3. The Draft State Plan was made available to the eligible entities for consideration.**
- 4. The Department provided a 10-day public comment period and held a public hearing on the State Plan; eligible entities' participation is encouraged.**
- 5. Following collection of comments from the eligible entities, the public comment process, and the public hearing, the Department finalized and submitted the State Plan to OCS.**

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

**3.4b. Performance Management Adjustment:** Describe how the state has adjusted its State Plan development procedures under this State Plan, as compared to previous plans, in order to 1) encourage eligible entity participation and 2) ensure the State Plan reflects input from eligible entities? Any adjustment should be based on the state's analysis of past performance in these areas, and should consider feedback from eligible entities, OCS, and other sources, such as the



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

**The Department continues to utilize the State Plan development flowchart developed from the 2016 ACSI survey results. The chart reflects the activities of each entity (Department, state association and eligible entities) and includes timeframes for planning purposes. The Department also provided the draft model State Plan in advance of the May CSBG Program Manager meeting to encourage eligible entities to review the plan prior to the meeting. (See attachment 3.4b)**

**This year, the Department held a secondary meeting to discuss the Model State Plan with the CSBG Program Managers from each eligible entity. The meeting highlighted the Community Needs Assessment outcomes and offered an additional opportunity for CSBG Program Managers to provide input on the Model State Plan development.**

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

**3.5. Eligible Entity Overall Satisfaction:** Provide the state's target for eligible entity Overall Satisfaction during the performance period. Year One: **69** Year Two: **69**

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

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

## Section 4 CSBG Hearing Requirements

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

**The Department published a legal notice statewide announcing the public comment period for the draft State Plan and the public hearing date. The draft State Plan was made available on the Department’s website, and a hard copy of the draft State Plan was available at the Department’s office and upon request. A link to the draft State Plan was emailed to the state association and the eligible entities, with a request to distribute to any community partners or other interested parties.**

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

**The Department allowed 10 days for public comment. Public comments were accepted by mail, email, or in person at the Department’s office. Comments were also accepted at the public hearing, as were the statements of any interested parties who attended.**

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

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

Date	Location	Type of Hearing <i>[Select an option]</i>	If a Combined Hearing was held confirm that the public was invited.
07/30/2019	450 West State Street, Boise, Idaho, 83720	<input checked="" type="radio"/> Public <input type="radio"/> Legislative <input type="radio"/> Combined	<input type="checkbox"/>
02/11/2019	Idaho State Capitol Building	<input type="radio"/> Public <input checked="" type="radio"/> Legislative <input type="radio"/> Combined	<input type="checkbox"/>
<b>ADD a ROW function Note: States will be able to add as needed for each additional hearing.</b>			

- 4.4. Attach supporting documentation or a hyperlink for the public and legislative hearings. The Department held a public hearing July 30, 2019 from 9-11 am and will upload the hearing announcement, sign-in sheet, and other public hearing documents into OLDC.**

**The Legislative Hearing information is available at the following link:**

[https://legislature.idaho.gov/wp-content/uploads/sessioninfo/2019/standingcommittees/190211\\_jfac\\_0800AM-Minutes.pdf](https://legislature.idaho.gov/wp-content/uploads/sessioninfo/2019/standingcommittees/190211_jfac_0800AM-Minutes.pdf)

## Section 5 CSBG Eligible Entities

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

<b>CSBG Eligible Entity</b>	<b>Geographical Area Served (by county) [Provide all counties]</b>	<b>Public or Nonprofit</b>	<b>Type of Entity (choose all that apply)</b>
<b>Community Action Partnership Association of Idaho</b>	All counties in Idaho	<b>Nonprofit</b>	<ul style="list-style-type: none"> <li>• Community Action Agency</li> </ul>
<b>Community Action Partnership</b>	Idaho's ten most Northern counties: Benewah, Bonner, Boundary, Clearwater, Idaho, Kootenai, Latah, Lewis, Nez Perce, and Shoshone.	<b>Nonprofit</b>	<ul style="list-style-type: none"> <li>• Community Action Agency</li> </ul>
<b>Western Idaho Community Action Partnership</b>	Idaho's seven Western counties: Adams, Boise, Gem, Canyon, Payette, Valley and Washington.	<b>Nonprofit</b>	<ul style="list-style-type: none"> <li>• Community Action Agency</li> </ul>
<b>El-Ada Community Action Partnership, Inc.</b>	Idaho's three Southwestern counties: Ada, Elmore, and Owyhee.	<b>Nonprofit</b>	<ul style="list-style-type: none"> <li>• Community Action Agency</li> </ul>
<b>South Central Community Action Partnership</b>	Idaho's eight South central counties: Blaine, Camas, Cassia, Gooding, Jerome, Lincoln, Minidoka, and Twin Falls.	<b>Nonprofit</b>	<ul style="list-style-type: none"> <li>• Community Action Agency</li> </ul>
<b>Southeastern Idaho Community Action Agency</b>	Idaho's seven Southeastern counties: Bannock, Bear Lake, Bingham, Caribou, Franklin, Oneida, and Power.	<b>Nonprofit</b>	<ul style="list-style-type: none"> <li>• Community Action Agency</li> </ul>
<b>Eastern Idaho Community Action Partnership</b>	Idaho nine Eastern Counties: Bonneville, Butte, Clark, Custer, Fremont, Jefferson, Lemhi, Madison, and Teton.	<b>Nonprofit</b>	<ul style="list-style-type: none"> <li>• Community Action Agency</li> </ul>

CSBG Eligible Entity	Geographical Area Served (by county) [Provide all counties]	Public or Nonprofit	Type of Entity (choose all that apply)
Community Action Partnership Association of Idaho	All counties in Idaho	Nonprofit	<ul style="list-style-type: none"> <li>• Community Action Agency</li> </ul>
Community Council of Idaho	Serving all of Idaho's migrant and seasonal farm workers. Primary emphasis is on Idaho's Southern counties.	Nonprofit	<ul style="list-style-type: none"> <li>• Migrant or Seasonal Farmworker Organization</li> </ul>
<b>THE ADD-A-ROW FUNCTION WILL NOT BE AVAILABLE ON THIS TABLE. ANY ADDITIONS/DELETIONS TO THE ELIGIBLE ENTITY LIST SHOULD BE MADE WITHIN THE MASTER LIST.</b>			

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

**5.2.** Total number of CSBG eligible entities: 8

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

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

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

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

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

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

## Section 6 Organizational Standards for Eligible Entities

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

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

- COE CSBG Organizational Standards
- Modified version of COE CSBG Organizational Standards
- Alternative set of organizational standards

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

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

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

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

There were no changes from the previous State Plan submission **[Narrative, 2500 characters if not selected]**

Provide reason for using alternative standards **[Narrative, 2500 characters]**

Describe rigor compared to COE-developed Standards **[Narrative, 2500 characters]**

**6.2. Implementation:** Check the box that best describes how the state officially adopted 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. **[Check all that applies and narrative (as applicable)]**

- Regulation
- Policy
- Contracts with eligible entities
- Other, describe: **[Narrative, 5000 characters]**

**6.3. Organizational Standards Assessment:** Describe how the state will assess eligible

entities against organizational standards this federal fiscal year(s). **[Check all that apply]**

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

**6.3a. Assessment Process:** Describe the planned assessment process.

**Idaho will continue to utilize the COE-Developed CSBG Organizational Standard Self-Assessment Tool in the review of each eligible entity. Idaho has provided eligible entities with Training and Technical Assistance supporting the Organizational Standard review each year. The training focus has improved the submittal process and provided consistency in the documentation provided to the Department in support the self-assessments and organizational standard compliance. The results of the self-assessment and supporting documents are screened by the state association, then validated by the Department.**

**The tool provides opportunity for the Department to dialogue with Idaho’s eligible entities on the continuous implementation of each organizational standard safeguarding overall health of their organization. The self-assessment will also be utilized to identify any training and technical assistance necessary to ensure ongoing compliance with the Organizational Standards.**

**If the Department determines an eligible entity has an unmet standard, or set of standards, appropriate steps will be developed to ensure the standard(s) are met within a reasonable timeframe. The Department continues to refine the Technical Assistance Plan tool to better support the state association and provides direction for training and technical assistance needed in the network. The State Association will provide T/TA to any eligible entity with an unmet standard, this may include a Technical Assistance Plan (TAP).**

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

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

**6.5. Performance Target:** Provide the percentage of eligible entities that the state expects to meet all the state-adopted organizational standards for the FFY(s) of this planning period. **Year One 100% Year Two 100%**

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



## 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. **[Check one and narrative where applicable]**

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

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

There are some states that have a "base" amount (which might be the 6%) but the "percentage of poverty for that entity" presumably is the percentage of people in poverty in the counties or geographic area covered by the eligible entity as a portion of the overall number of people in poverty within the state. It would be helpful if the state would provide a little more clarity in their explanation.

**Each eligible entity receives a base funding of six percent (6%) of Idaho's CSBG allocation. After deducting state administrative expenses and funds for statewide activities, the eligible entities will receive the remaining funds, based on the ratio of Idaho's low-income population residing within each service area.**

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

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

**Year One 90 %    Year Two 90 %**

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

Planned CSBG 90 Percent Funds				
CSBG Eligible Entity	Year One		Year Two	
	Funding Amount \$	Funding Amount %	Funding Amount \$	Funding Amount %
Will be auto-populated from Section 5, Table 5.1, Column 1	Enter either the dollar amount or percentage for each eligible entity for the first year that this plan covers		Enter either the dollar amount or percentage for each eligible entity for the second year that this plan covers (If this is a one-year plan, these columns can be left blank)	
Community Action Partnership	22.86% (\$617,411)		22.86% (\$617,411)	
Western Idaho Community Action Partnership	16.39% (\$442,623)		16.39% (\$442,623)	
El-Ada Community Action Partnership, Inc.	16.90% (\$456,221)		16.90% (\$456,221)	
South Central Community Action Partnership	12.06% (\$325,665)		12.06% (\$325,665)	
SouthEastern Idaho Community Action Partnership	11.55% (\$311,959)		11.55% (\$311,959)	
Eastern Idaho Community Action Partnership	13.24% (\$357,586)		13.24% <sup>189</sup> (\$357,586)	
Community Council of Idaho	7.00% (\$189,035)		7.00% (\$189,035)	
<b>Total</b>	Totals will be auto-populated		Totals will be auto-populated	

**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).

CSBG funding is distributed to eligible entities through a passthrough contract with the state association. Contracts are updated to be in effect by the first of the federal fiscal year (October 1). The Department front-loads contracts with an estimated amount of funding, and releases spending authority memos notifying entities of the amount of funds currently available based on federal funding award allocations. Release of fund notifications are sent within 10 business days of the release of the federal award allocation. When necessary, contracts will be updated within 30 days of receiving additional federal award allocations.

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

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

**[Narrative, 5000 Characters]**

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

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

**The Department has implemented processes to improve grant/contract administration procedures. Idaho has considered feedback from CSBG eligible entities, OCS, public hearings, and other sources and/or the ACSI survey. The Department is invested in implementing the guidance provided from OCS via IM #150 use of the American Customer Satisfaction Index (ACSI). Following receipt of the ACSI survey results in 2016 the Department and the state association coordinated review of the survey results and the information was shared with eligible entities. In collaboration with the network several activities have resulted in enhancing the existing partnership and furthering the opportunity for planning improvement strategies.**

**The following activities take place:**

- **Two, two-day in-person training and technical assistance meetings with the second day reserved for Peer Exchange, T&TA and discussion.**
- **Monthly manager phone meetings**
- **Eligible Entity in-person visits for CSBG programmatic T&TA**
- **On-site training for the state-wide database**
- **Eligible Entity community level initiative technical assistance**

The Department continues to provide the State Association and the eligible entities routine email updates respective to OCS funding announcements and remains committed to ensuring transparency regarding administrative procedures. The Department also continues to provide the network with consistent, useful and clear monitoring reports focused on enhancing program integrity. The Department and state association recognized survey results identified “Linkages and Communication” efforts requiring improvement. The Department and state association created a communication flow chart providing a high-level overview of the State Plan timeline, comment and public hearing process and exchanged this tool with the local agencies. Local agency CSBG managers meet via webinar monthly. The Department has joined as a participant in these discussions, which has benefited Idaho’s CSBG programming by assisting to enhance program alignment.

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

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

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

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

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

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

**Year One 2 Year Two 2**

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

**Year One 1 Year Two 1**

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

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

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

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

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

<b>Use of Remainder/Discretionary Funds – Year One</b>		
<b>Remainder/Discretionary Fund Uses</b> (See 675C(b)(1) of the CSBG Act)	<b>Planned \$</b>	<b>Brief Description of Services and/or Activities</b>
7.9a. Training/technical assistance to eligible entities	<b>\$149,500.00</b>	These planned services/activities will be described in State Plan Item 8.1 <b>[Read Only]</b>
7.9b. Coordination of State-operated programs and/or local programs		These planned services/activities will be described in State Plan Section 9, State Linkages and Communication <b>[Read Only]</b>
7.9c. Statewide coordination and communication among eligible entities		These planned services/activities will be described in State Plan Section 9, State Linkages and Communication <b>[Read Only]</b>
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need		<b>[Narrative, 5000 characters]</b>
7.9e. Asset-building programs		<b>[Narrative, 5000 characters]</b>
7.9f. Innovation programs/activities by eligible entities or other neighborhood group		The Department has elected to use the allocation to support a statewide database and the Idaho/Washington Oregon Theory of Change (“The Futures Project”). The statewide database is utilized by all eligible entities in Idaho to collect data and generate reporting. This system provides the ability to track individual and family level information, demographic information, utilization of program information, service/referral tracking, household financial information and program-specific information. This system allows Idaho to utilize a common intake process across programs, and to report on an organizational, county and statewide level. The Futures Project initiative focuses on equipping 53 Community Action agencies in Idaho, Oregon, and Washington to tell a collective story of how we are building a new future for people affected by poverty. The project is specifically focused on initiating comprehensive community-level change and robust family outcomes.
7.9g. State charity tax credits		<b>[Narrative, 5000 characters]</b>
7.9h. Other activities [Specify under Column 4]		Specify the other activities funded through discretionary funds here. <b>[Narrative, 5000 characters]</b>
<b>Totals</b>		<b>Auto-calculated</b>

<b>Use of Remainder/Discretionary Funds – Year Two (as applicable)</b>		
<b>Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)</b>	<b>Planned \$</b>	<b>Brief Description of Services and/or Activities</b>
7.9a. Training/technical assistance to eligible entities	<b>\$149,500.00</b>	These planned services/activities will be described in State Plan Item 8.1 <b>[Read Only]</b>
7.9b. Coordination of State-operated programs and/or local programs		These planned services/activities will be described in State Plan section 9, State Linkages and Communication <b>[Read Only]</b>
7.9c. Statewide coordination and communication among eligible entities		These planned services/activities will be described in State Plan section 9, State Linkages and Communication <b>[Read Only]</b>
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need		<b>[Narrative, 5000 characters]</b>
7.9e. Asset-building programs		<b>[Narrative, 5000 characters]</b>
7.9f. Innovation programs/activities by eligible entities or other neighborhood group		The Department has elected to use the allocation to support a statewide database and the Idaho/Washington Oregon Theory of Change (“The Futures Project”). The statewide database is utilized by all eligible entities in Idaho to collect data and generate reporting. This system provides the ability to track individual and family level information, demographic information, utilization of program information, service/referral tracking, household financial information and program-specific information. This system allows Idaho to utilize a common intake process across programs, and to report on an organizational, county and statewide level. The Futures Project initiative focuses on equipping 53 Community Action agencies in Idaho, Oregon, and Washington to tell a collective story of how we are building a new future for people affected by poverty. The project is specifically focused on initiating comprehensive community-level change and robust family outcomes.
7.9g. State charity tax credits		<b>[Narrative, 5000 characters]</b>

Use of Remainder/Discretionary Funds – Year Two (as applicable)		
Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
7.9h. Other activities [Specify under Column 4]		Specify the other activities funded through discretionary funds here. <b>[Narrative, 2500 characters]</b>
<b>Totals</b>	<b>Auto-calculated</b>	

**7.10. Remainder/Discretionary Funds Partnerships:** Select the types of organizations, if any, the state plans to work with (by grant or contract using remainder/discretionary funds) to carry out some or all of the activities in Table 7.9. **[Check all that apply and narrative where applicable]**

- The state directly carries out all activities (No Partnerships)
- The state does not have remainder/discretionary funds
- The state partially carries out some activities
- CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds) **[7]**
- 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 **[Narrative, 2500 characters]**

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

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

**The Department has discussed use of these funds with the state association and eligible entities and considered the value of the use of these funds as described in the table in Section 7.9. The Department believes the use of discretionary funds is appropriate and supports both statewide and regional data collection/reporting efforts.**

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

## SECTION 8

### State Training and Technical Assistance

**8.1. Training and Technical Assistance Plan:** Describe the state’s plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan by completing the table below. Add a row for each activity: indicate the timeframe; whether it is training, technical assistance or both; and the topic. (CSBG funding used for this activity is referenced under item 7.9a., Use of Remainder/Discretionary Funds. States should also describe training and technical assistance activities performed directly by state staff, regardless of whether these activities are funded with remainder/discretionary funds.)

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

Fiscal Year (FY) Quarter (Q) / Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
FY1 Q1	Training	Other	Theory of change
FY1 Q1	Training	Governance/Tripartite Boards	Board resources
FY1 Q1	Training	Governance/Tripartite Boards	Board financial reports
FY1 Q2	Training	Other	Resources for Staff Development
FY1 Q2	Training	Organizational Standards – General	
FY1 Q3	Both	Other	Multiple topics at May in-person manager meeting
FY1 Q4	Both	Other	Multiple topics at September in-person manager meeting
FY1 Q4	Training	ROMA	
Ongoing	Technical Assistance	Other	Technical update and demo on CaseWorthy improvements
Ongoing	Both	Reporting	Program Reporting / Annual Report
Ongoing	Both	Other	Data Analysis
ONGOING	Both	Other	Database training & one-on-one consultation for eligible entities
ONGOING	Both	Other	Development and implementation of Universal Intake with EICAP first, then other agencies



Fiscal Year (FY) Quarter (Q) / Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
FY2 Q1	Training	Organizational Standards – General	
FY2 Q3	Both	Other	Multiple topics at May in-person manager meeting
FY2 Q4	Training	ROMA	
FY2 Q4	Both	Other	Multiple topics at September in-person manager meeting
Ongoing	Technical Assistance	Other	Technical update and demo on CaseWorthy improvements
Ongoing	Both	Reporting	Program Reporting / Annual Report
Ongoing	Both	Other	Data Analysis
ONGOING	Both	Other	Database training & one-on-one consultation for eligible entities
ONGOING	Both	Other	Development and implementation of Universal Intake with EICAP first, then other agencies

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

Year One 0      Year Two 0

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

**The Department will collaborate with the State Association monthly to discuss training and technical assistance opportunities. The T&TA opportunities will be identified by annual review of Organizational Standards, triennial monitoring, annual reporting outcomes, as well as other monitoring practices. In addition to agency and state-level T&TA, the Department will meet with the State Association annually to develop a T&TA plan and help support the focus of statewide and regional initiatives.**

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

**Note:** 8.2 is associated with State Accountability Measure 6Sb. QIPs are described in Section 678C(a)(4) of the CSBG Act. If the state, according to their corrective action procedures, does not plan to put a QIP in place for an eligible entity with one or more unmet organizational standards, the state should put a TAP in place to support the entity in meeting the standard(s).

- 8.2a. Address Unmet Organizational Standards:** Describe the state’s plan to provide T/TA to eligible entities to ensure they address unmet Organizational Standards. [Narrative, 2500 characters]

Idaho currently has one TAP in place for an eligible entity who did not meet 100% of the Organizational Standards for the 2018 review of 2017. The Department developed a timeline and technical assistance plan for the agency with the unmet standard. The state association is working directly with the agency to ensure the TAP is resolved in a timely manner. Of the seven eligible entities in Idaho, three agencies were at risk of a TAP; two agencies resolved all items observed as a potential TAP with the Department’s approval. The Department provided written letters of completion once all TAP items were addressed by an eligible entity and the documentation was verified. No eligible entities were placed on a QIP for the 2018 Organizational Standards submission.

Idaho is currently in the process of reviewing 2018 Organizational Standards for the 2019 submission. Once the review is complete, the Department will provide outcomes, including best practices, to each agency. If any agency is found to have an unmet standard, the Department may pursue a Technical Assistance Plan (TAP).

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

- CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds) [Numeric response, 0 – 100]
- 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 [Narrative, 1000 characters]

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

**The Department will provide training to eligible entity Board members in relation to the Organizational Standards to further support eligible entity compliance with programmatic requirements. The Department routinely analyzes data and outcome measures in addition to collecting feedback from eligible entities in order to provide effective training and technical assistance.**

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

## SECTION 9

### State Linkages and Communication

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

**9.1. State Linkages and Coordination at the State Level:** Describe the linkages and coordination at the state level that the state intends to create or maintain to ensure increased access to CSBG services to low-income people and communities under this State Plan and avoid duplication of services (as required by the assurance under Section 676(b)(5)). Describe additional information as needed. **[Check all that apply from the list below and provide a Narrative, 5000 Characters]**

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

- State Low Income Home Energy Assistance Program (LIHEAP) office
- State Weatherization office
- State Temporary Assistance for Needy Families (TANF) office
- 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

**The Department houses the state TANF, SNAP, Child Care, LIHEAP, CSBG, TEFAP, Weatherization, and Child Support programs in the same unit that administers the state CSBG program, the Division of Welfare. The Division directly operates a coordinated statewide eligibility system (the Idaho Benefit Eligibility System, or IBES), which determines eligibility and provides direct benefits for SNAP, Medicaid, TANF, and Child Care services.**

**The Division of Welfare is located in the Department's central business office in Boise, Idaho. The Department's central business office also houses the State Public Health office, Head Start office, and Child Welfare office. The Department also maintains close communications with the Idaho Department of Education, the State Controller's Office, and the Idaho Department of Labor (the lead agency for State WIOA implementation). The Department continually seeks out opportunities to collaborate on state-level initiatives, both within the Division and also outside the Division in close collaboration with other State Departments.**

**These linkages allow the Department to facilitate collaboration with CSBG eligible entities to coordinate access for a variety of services that are available to support CSBG families.**

- 9.2. State Linkages and Coordination at the Local Level:** Describe the linkages and coordination at the local level that the state intends 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 Section 676(b)(5) – (6)).

**The Department participates on a variety of local and statewide networks and coalitions that address issues and provide resources to low-income families. Through participation in these groups, the Department builds relationships with community partners. For example, the Department is convening a group of stakeholders to assist with identifying food security issues impacting low-income families across the state. The state association is a participating member of the group and will be able to share outputs from this working group with the CSBG eligible entities to assure collaboration among community organizations serving local communities. In addition, the Department works with a variety of partner state entities as identified in Section 9.1 of this plan. The Department is available to the eligible entities to facilitate linkages as requested.**

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

**9.3. Eligible Entity Linkages and Coordination**

- 9.3a. State Assurance of Eligible Entity Linkages and Coordination:** Describe how the state will assure that eligible entities will 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)).

**Idaho’s CSBG-eligible entities coordinate programs and form partnerships with other providers of services to eligible low-income individuals and families. These entities provide resources to help people out of poverty and assist the agencies in leveraging available community services. The list of these partners is always expanding.**

**The Department assures that CSBG eligible entities establish and maintain local**

linkages through annual Organizational Standards review, assessments of Community Action Plans, annual reporting, and other monitoring activities. Eligible entities are encouraged to share best practices in establishing linkages through opportunities such as statewide conferences and conference calls.

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

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

Idaho's CSBG eligible entities work to meet the needs of their communities as identified through community needs assessments. Where CSBG eligible entities identify gaps in services, they work with other service providers and government agencies to leverage limited resources to fill those gaps and avoid duplication of services. They organize and attend meetings and participate in task forces with local service provider groups, and work closely with city, county and state governments to ensure the effectiveness of services to the low-income.

The CSBG eligible entities also keep an updated list of all available resources in their service areas. When a CSBG eligible entity identifies a need that they cannot directly fill, the CSBG eligible entity seeks partnerships to fill that need. For example, in Ada County, Idaho's largest and most populated county, there is a need for case management services for people who are Medicaid ineligible, including those who are disabled, immigrants and refugees. In order to address this need that the local entity cannot meet, they partner with local service providers that may have capacity and provide referrals to clients. Further, some eligible entities use their community planning forums to leverage resources to provide case management across multiple partners.

The Department assures that CSBG eligible entities establish and maintain local linkages through annual reporting, assessments of Community Action Plans, and monitoring activities. Eligible entities are encouraged to share best practices in establishing linkages through opportunities such as statewide conferences and conference calls.

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

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

Yes  No

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

**9.4a. WIOA Combined Plan:** If the state selected yes under Item 9.4, provide the CSBG-specific information included in the state’s WIOA Combined Plan. This information includes a description of how the state and the eligible entities will coordinate the provision of employment and training activities through statewide and local WIOA workforce development systems. This information may also include examples of innovative employment and training programs and activities conducted by community action agencies or other neighborhood-based organizations as part of a community antipoverty strategy. **[Narrative, 5000 Characters]**

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

**The Department is part of a task force put together by the Idaho Department of Labor to coordinate the delivery of employment and training activities under WIOA. Department representatives (including the program managers for TANF, SNAP, and CSBG) are working with the Idaho Department of Labor in partnering to develop the mandatory one-stops required as part of the state’s workforce investment systems. In addition, the Department and its CSBG eligible entities have linkages with other entities including:**

- Workforce Development Boards
- Idaho Department of Labor program
- National Farm Workers’ Jobs Program
- Vocational Rehabilitation Placement programs
- Idaho Department of Education Youth and Adult Programs
- Community colleges and public and private universities

**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).

**The Department assures CSBG eligible entities operate other low-income programs, such as the Low-Income Home Energy Assistance Program (including emergency crisis intervention), and the Department of Energy’s Weatherization Assistance Program.**

**In addition to operating the above programs as part of the CSBG eligible entities’ regular business operations, each eligible entity develops relationships with local organizations to leverage resources for referrals and partnerships. Existing resources include:**

- Project Share

- Project Cares
- Helping Hands
- Keep Kids Warm
- Community/statewide utility company energy assistance programs
- Energy conservation kits

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

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

**CSBG eligible entities take an active role in community partnership and community engagement. Each entity develops relationships with local organizations to coordinate efforts, leverage resources for referrals, and provide services to low-income families and communities. Some of these partnerships are:**

- Idaho Department of Health and Welfare
- Idaho Department of Labor
- Boise State University
- University of Idaho
- Idaho Hunger Relief Task Force
- Catholic Charities of Idaho
- Easter Seals/Goodwill
- Idaho Interfaith Roundtable Against Hunger
- Human Needs Council
- Chambers of Commerce
- Local city and county government
- Multiple Housing Authorities in Idaho
- International Refugee Commission
- Head Start
- Area Agency on Aging
- The Idaho Foodbank
- Idaho Housing and Finance Association
- Salvation Army
- Corpus Christi Ministries
- St. Vincent de Paul
- World Rescue Mission
- Idaho Legal Aid Services
- Veterans Administration
- Idaho Office of Refugees
- Second Harvest Inland Northwest
- Deseret Industries
- Idaho State University

**The Department assures that eligible entities coordinate and form partnerships with faith-based organizations, charitable groups, and other community organizations**



through annual Organizational Standards review and other monitoring activities. The Department encourages eligible entities to share best practices in establishing these partnerships through opportunities such as in-person meetings and conference calls.

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

- 9.7. Coordination of Eligible Entity 90 Percent Funds with Public/Private Resources:**  
Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act.

**CSBG eligible entities take an active role in community partnership and community engagement. Each eligible entity develops relationships with other public and private resources to address local needs. Eligible entities may also apply for other public or private sources of funding to support delivery of needed services to low-income families and communities.**

**Some of these resources include:**

- Housing and Urban Development
- Other Health and Human Services offices
- United States Department of Agriculture
- AmeriCorps
- University of Idaho
- College of Western Idaho
- College of Southern Idaho
- Continuum of Care
- Lewis and Clarke State College
- Eastern Idaho Technical College
- Boise State University
- Idaho State University
- Internal Revenue Service
- Wells Fargo Bank
- Idaho Credit Union Association
- United Way
- Department of Energy
- A number of foundations and private sector sources

**The Department assures that eligible entities coordinate with other available public or private resources through Organizational Standards assessments and monitoring activities. The Department encourages eligible entities to share best practices in coordinating with other public or private resources, or in directly pursuing these resources.**

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

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

**The Department supports coordination by contracting with the state association to deliver training and technical assistance and some of the administrative functions of the CSBG plan allowable under the CSBG act. Through the State monitoring and Organizational Standards assessment process, the Department works closely with the state association to identify training opportunities to optimize resources and improve delivery of programs.**

**Additionally, the Department has allocated a portion of its discretionary funds to the state association for the development and implementation of a statewide data collection system. Discretionary funds will be made available to both the state association and CSBG eligible entities to promote consistent data gathering and reporting standards. In addition, the state supports Idaho’s participation in The Futures Project with representation by the state association that is charged with representing the needs of Idaho’s CSBG eligible entities’ network.**

**The State Plan planning process also supports coordination between the Department, state association and CSBG eligible entities. As outlined in Section 3.4a, the Department convenes an annual meeting to bring together all parties to review community needs assessments and CAP plans, discuss best practices in programming at the community level and strategies for maximizing discretionary funding to best serve Idaho’s needs. Other collaborative activities include partnering with the state association to serve on statewide task forces to represent the interests of CSBG eligible entities.**

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

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

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

Subject Matter	Expected Frequency	Format	Brief Description of “Other”
Upcoming Public and/or Legislative Hearings	As Needed	<ul style="list-style-type: none"> <li>• Website</li> <li>• Email</li> <li>• Public Notice</li> </ul>	
State Plan Development	Semi-Annually	<ul style="list-style-type: none"> <li>• Meetings/Presentations</li> <li>• Phone Calls</li> <li>• Email</li> </ul>	

Organizational Standards Progress	Semi-Annually	<ul style="list-style-type: none"> <li>• Webinar</li> <li>• Phone Calls</li> <li>• Email</li> <li>• Meetings/Presentations</li> </ul>	
State Accountability Measures Progress	Annually	<ul style="list-style-type: none"> <li>• Email</li> </ul>	
Community Needs Assessments/Community Action Plans	As Needed	<ul style="list-style-type: none"> <li>• Email</li> <li>• Meetings/Presentations</li> </ul>	
State Monitoring Plans and Policies	Triennial	<ul style="list-style-type: none"> <li>• Email</li> <li>• Phone Calls</li> </ul>	Updates to policy are provided "As Needed"
Training and Technical Assistance (T/TA) Plans	Quarterly	<ul style="list-style-type: none"> <li>• Email</li> <li>• Phone Calls</li> <li>• Meetings/Presentations</li> </ul>	
ROMA and Performance Management	As Needed	<ul style="list-style-type: none"> <li>• Meetings/Presentations</li> </ul>	
State Interagency Coordination	N/A	N/A	
CSBG Legislative/Programmatic Updates	As Needed	<ul style="list-style-type: none"> <li>• Email</li> <li>• Phone Calls</li> <li>• Meetings/Presentations</li> </ul>	
Tripartite Board Requirements	Semi-Annually	<ul style="list-style-type: none"> <li>• Meetings/Presentations</li> </ul>	
The Department and State Association Network	Monthly	<ul style="list-style-type: none"> <li>• Meetings/Presentations</li> </ul>	The Department and the State Association meet to exchange communications, provide programmatic updates, gather feedback from the network, and discuss T&TA opportunities.

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

**The Department provides feedback on eligible entity accountability measures through the formal monitor process and Organizational Standards assessments. In addition, feedback from OCS on statewide performance on State Accountability Measures will be provided to the state association and eligible entities via email within 60 calendar days of the date OCS feedback is received. This information will be addressed as part of the ongoing training opportunities and during the annual State Plan review.**

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

**9.11. Performance Management Adjustment:** Describe any adjustments the state made to

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

**The Department realigned the Communication Plan to support Subject Matter topics listed within the State Plan. Idaho considers feedback from CSBG Eligible Entities, OCS, public hearings, and other sources; including American Customer Satisfaction Index survey results. The Department is invested in implementing the guidance provided from OCS via IM #150 use of the American Customer Satisfaction Index (ACSI). In collaboration with the network several activities have resulted in enhancing the existing partnership and furthering the opportunity for planning improvement strategies.**

**As a result, the following activities take place:**

- **Two, two-day in-person training and technical assistance meetings with the second day reserved for Peer Exchange, T&TA and discussion.**
- **Monthly manager phone meetings**
- **Eligible Entity in-person visits for CSBG programmatic T&TA**
- **On-site training for the state-wide database**
- **Eligible Entity community level initiative technical assistance**

**This was a transition from a mix of remote support and scheduled in-person support having been provided. In-person database support was identified as valuable in that it provides the agencies opportunity to demonstrate their concerns to the trainer in real time, at their computer versus trying to bridge the gap when communicating the concern over the phone. The Department and state association recognized survey results identified Linkages and Communication efforts requiring improvement. The Department and the state association created a communication flow chart providing a high-level overview of the State Plan timeline, comment and public hearing process and exchanged this tool with the local agencies. Local agency CSBG managers meet via webinar monthly. The Department has joined as a participant in these discussions, which has benefited Idaho's CSBG programming by assisting to enhance program alignment.**

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

## SECTION 10

### Monitoring, Corrective Action, and Fiscal Controls

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

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

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

<b>Monitoring Schedule – Year One</b>						
CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of “Other”
Community Action Partnership	No Review	No Review	No Review			
South Central Community Action Partnership	No Review	No Review	No Review			
Eastern Idaho Community Action Partnership	No Review	No Review	No Review			
Community Council of Idaho	No Review	No Review	No Review			
El Ada Community Action Partnership, Inc.	No Review	No Review	No Review			
SouthEastern Idaho Community Action Agency	Full	Desk	FY1 Q4			
Western Idaho Community Action Partnership	Full	Desk	FY1 Q4			

<b>Monitoring Schedule – Year Two</b>						
CSBG Eligible Entity	Monitoring Type	Review Type	Target Quarter	Start Date of Last Full Onsite Review	End Date of Last Full Onsite Review	Brief Description of “Other”

Community Action Partnership	Full	Desk	FY2 Q4			
South Central Community Action Partnership	Full	Desk	FY2 Q4			
Eastern Idaho Community Action Partnership	Full	Desk	FY2 Q4			
Community Council of Idaho	No Review	No Review	No Review			
El Ada Community Action Partnership, Inc.	No Review	No Review	No Review			
SouthEastern Idaho Community Action Agency	No Review	No Review	No Review			
Westiner Idaho Community Action Partnership	No Review	No Review	No Review			

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

**10.2. Monitoring Policies:** Provide a copy of state monitoring policies and procedures by attaching and/or providing a hyperlink. **[Attach a document or add a link]**

**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? **15 calendar days**

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

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

**10.4. Closing Findings:** Are state procedures for addressing eligible entity findings/deficiencies, and the documenting closure of findings included in the state monitoring protocols attached above?  Yes  No

**10.4a. Closing Findings Procedures:** If no, describe state procedures for addressing eligible entity findings/deficiencies, and the documenting closure of findings. **[Narrative, 2500 characters]**

**10.5. Quality Improvement Plans (QIPs):** Provide the number of eligible entities currently on QIPs, if applicable. **0**

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

**10.6. Reporting of QIPs:** Describe the state’s process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the state approving a QIP? **The Department will contact the CSBG liaison via email identifying the entity that is operating under a QIP within 30 calendar days of the State approval of the QIP.**

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

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

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

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

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

**10.8a. New Designation Citation:** If yes, provide the citation(s) of the law and/or regulation. [<https://adminrules.idaho.gov/rules/current/16/160410.pdf>]

**10.8b. New Designation Procedures:** If no, describe state procedures for the designation of new eligible entities and how the procedures were made available to eligible entities and the public. [**Narrative, 5000 Characters**]

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

**10.9a. Termination Citation:** If yes, provide the citation(s) of the law and/or regulation. [<https://adminrules.idaho.gov/rules/current/16/160410.pdf>]

**10.9b. Termination Procedures:** If no, describe state procedures for termination of new eligible entities and how the procedures were made available to eligible entities and the public. [**Narrative, 5000 characters**]

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

**10.10a. Re-Designation Citation:** If yes, provide the citation(s) of the law and/or regulation. [<https://adminrules.idaho.gov/rules/current/16/160410.pdf>]

**10.10b. Re-Designation Procedures:** If no, describe state procedures for re-designation of existing eligible entities and how the procedures were made available to eligible entities and the public. [**Narrative, 5000 Characters**]

### **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).

**State Internal Fiscal Controls:**

Each CSBG budget component is assigned a Program Cost Accounting (PCA) code. When a federal award allocation is received, CSBG program staff meet with Department fiscal personnel to establish PCAs for the new grant award. Expenditures applicable to budget components are coded to the specific PCA. Invoices are coded with the associated PCAs. Monthly reports are prepared to show expenditures to each PCA code. Quarterly budget reviews are completed to assure accuracy of the expenditures.

**State Fiscal Controls for eligible entities:**

The Department requires all CSBG eligible entities to undergo an independent annual audit, and to provide the Department with the results of each annual audit. The Department also monitors CSBG eligible entities directly to ensure each entity has established appropriate fiscal controls, and that each entity follows the controls they have established.

The Department will conduct the following reviews of CSBG-eligible entities:

1. A full review of each CSBG eligible entity at least once during each 3-year period.
2. A review of each newly designated eligible entity immediately after the completion of the first year in which such eligible entity receives funds through the Community Services Block Grant program.
3. Follow-up reviews to CSBG eligible entities and their programs that fail to meet the goals, standards, and requirements established by the Department.
4. Other reviews as appropriate including reviews of eligible entities with programs that have had other federal, state or local grants (other than assistance provided under this subtitle) terminated for cause.
5. Annual reviews of any subcontracts funded with CSBG dollars

**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.

**The Department:**

- Receives and reviews all subrecipient single audit and catalog findings.
- Records findings on a shared team site.
- Identifies relevant DHW staff responsible for identifying and implementing



**follow up action needed.**

- **Reviews and approves all correction action plans required to ensure follow up actions are addressed appropriately.**

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

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

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

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

**The Department supports adjusting monitoring procedures in their State Plan by considering the results of our most recent ACSI survey, feedback received from our CSBG Managers (eligible entities), and via public hearings. If comments are made at public hearings, these are reviewed and incorporated if appropriate. Monitoring is an area that we scored highest in the ACSI survey. We are always continuing to update our procedures to best serve communities. Additionally, review of Organizational Standards attributes another layer to the monitoring standard. We look at past performance and verify that any items of concern were corrected.**

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

## SECTION 11

### Eligible Entity Tripartite Board

**11.1. Tripartite Board Verification:** Verify which of the following measures are taken to ensure that the state verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B(a)(2) of the CSBG Act. **[Check all that applies and narrative where applicable]**

- Attend Board meetings
- Organizational Standards Assessment
- Monitoring
- Review copies of Board meeting minutes
- Track Board vacancies/composition
- Other **[Narrative, 2500 characters]**

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

- Annually
- Semiannually
- Quarterly
- Monthly
- As It Occurs
- Other - **Eligible entities are to provide Board changes to bylaws, meeting minutes, vacancy alerts, and low-income member selection through regular reporting requirements. Updates may also be provided as part of the annual Organizational Standards assessment process.**

**11.3. Tripartite Board Representation Assurance:** Describe how the states will verify that eligible entities have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entity's Tripartite Board as required by the assurance under Section 676(b)(10) of the CSBG Act.

**This requirement is included in the contract requirements for each CSBG eligible entity. The Department will validate compliance through its annual Organizational Standards assessment and triennial monitor process.**

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

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

Section 676B(b)(2) of the CSBG Act?

Yes  No

**11.4a.** If yes, describe the mechanism used by public eligible entities as an alternative to a Tripartite Board. **[Narrative, 2500 Characters]**

## Section 12

### Individual and Community Income Eligibility Requirements

**12.1. Required Income Eligibility:** Provide the income eligibility threshold for services in the state. [Select one item below and numeric response where applicable.]

- 125% of the HHS poverty line
- X % of the HHS poverty line (fill in the threshold): \_\_\_\_\_% [Numeric response]
- Varies by eligible entity [Narrative, 5000 characters]

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

**State regulations (IDAPA 16.04.10) state that assistance under CSBG is limited to households with countable income at or below one-hundred twenty-five percent (125%) of the Federal Poverty Guidelines. The guidelines are updated annually by the Department and released to eligible entities on July 1 of each year. All earned and unearned income is counted in determining eligibility, unless excluded by rule.**

**By rule, the following income is excluded when determining CSBG eligibility:**

- Benefit payments from Medicare Insurance;
- State cash assistance payments;
- Child care subsidy payments;
- Private loans made to the participant or the household;
- Assets withdrawn from a personal bank account;
- Sale of real property if reinvested within three (3) calendar months;
- Lump sum payment from an IRA;
- Income tax refunds;
- Income from capital gains;
- Infrequent, irregular or unpredictable income from gifts or lottery winning of less than one hundred dollars (\$100);
- Wages or allowances paid to a live-in attendant for care of a disabled person;
- Interest posted to a bank account;
- Monies for educational purposes from the federal Perkins/National Direct Student Loan Program, college work-study programs, state student incentive grants, Supplemental Education Opportunity Grants, Pell, guaranteed student loans, and supplemental grant funded under Title IV, A-2;
- Monies from the VA-GI Bill for Education;
- Department of Health and Welfare adoption subsidies;
- Compensation to volunteers under the Older American Act or Foster Grandparent Program, including Green Thumb and VISTA volunteers, and the Title V Senior Employment Program;
- Payments made by a third party, non-household member for the household, such as for child care, energy assistance, shelter, food and clothing assistance;
- Value of food stamps or donated food;
- Utility allowance;
- Child support income.

Households may provide documentation of their income or may self-declare their income. There is no requirement to view, collect, or store documentation to verify the household's income. The Idaho CSBG program defines a household as one economic unit. CSBG allows multiple economic units residing at one address. Household eligibility is reassessed on an annual basis.

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

**For services with limited income intake procedures, the Department allows households to self-declare their income with signature on an application for services. If the household reports their income to be at or below 125% of FPL, then the household is eligible for CSBG funded services, programs, and initiatives. Eligibility is reassessed on an annual basis.**

**The Department ensures that CSBG eligible entities obtain an application with signature declaring income eligibility for services through the state monitoring process. As part of the triennial monitor, the Department completes a file review to verify that entities obtained participant signature to self-declare income eligibility of households served through CSBG programs.**

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

**The Department ensures eligible entities' services benefit low-income communities by reviewing the Community Action Plans, Community Needs Assessments, and Strategic Plans. The eligible entity application, assessment, and planning result in solid community initiatives that help target low-income communities in Idaho. Additionally, the Department and State Association provide ongoing training and technical assistance to eligible entities' community level initiatives in support of the Annual Report.**

## SECTION 13

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

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

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

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

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

**The Results Oriented Management and Accountability (ROMA) System is applied to all CSBG funded eligible entity programs. The eligible entities incorporate the six national ROMA Goals into the strategic planning, as well as integrate the Core Competencies into the Community Action Plan and Community Needs Assessments. The Idaho CSBG operations manual covers ROMA history, core competencies, goals, and how ROMA is implemented into the CSBG supported programs. Additionally, the ROMA training is included into the State's Training and Technical Assistance Plan and provided to the eligible entities quarterly, or as needed.**

- 13.1b. Alternative System Description:** If an alternative system was chosen in Item 13.1, describe the system the state will use for performance measurement. **[Narrative, 5000 characters]**

- 13.2. Outcome Measures:** Indicate and describe the outcome measures the state will use to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization, as required under Section 676(b)(12) of the CSBG Act. **[Select one and Narrative, 5000 characters]**

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

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

**Idaho currently collects data and generates reporting for the National Performance Indicators (NPIs) using a statewide database. Idaho collects data for the National Performance Indicators as required for the CSBG Annual Report (Modules 3 and 4) and will be reported annually. Idaho has an established process to utilize outcome**

measurement for annual reporting to measure eligible entity performance in activities as required in Section 676(b)(12) of the CSBG Act. This process includes review of planning numbers and actual outcomes, review of data accuracy and validating reported indicator outcome data.

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

The Department coordinates with the state association to provide ROMA training and technical assistance. Beginning in mid-2019, Idaho has 9 Implementers and 1 trainer. The state association makes a portion of their Regional Performance Innovation Consortium funding available to eligible entities for ROMA related activities including ROMA training, strategic planning needs assessment development, and ROMA certification support.

Beginning in 2019 or 2020, we hope to coordinate Idaho's ROMA trainer (at WICAP) to provide *Introduction to ROMA* training to the entire state. Agencies will be given the opportunity to send new and existing staff to this event.

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

- 13.4. Eligible Entity Use of Data:** Describe how the state plans to validate that the eligible entities are using data to improve service delivery.

The Department validates eligible entity use of data to improve service delivery through the monitoring process. The Department reviews annual NPI data and compares reported NPI outcomes to planned NPI outcomes. The Department also reviews Board minutes and strategic planning documentation to identify how eligible entities use data to improve their service delivery during the annual review of Organizational Standards self-assessments and verification documentation. Bi-Annual review of the Community Action Plans also monitors for data-supported findings for the top-three needs of eligible entities.

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

## Community Action Plans and Needs Assessments

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

**Idaho's CSBG eligible entities must complete a Community Action Plan at least once every two years as required through each eligible entity's CSBG contract. Each eligible entity must use the information gathered through their most recent Community Needs Assessment to complete their Community Action Plan.**

**As part of the CSBG State Plan planning process, eligible entities are required to submit their completed Community Action Plan to the Department. Prior to releasing CSBG funds to the eligible entities, the Department reviews Community Action Plan submissions and verifies that each eligible entity's most recent plan is on file.**

**The Department also ensures that eligible entities are current in their Community Action Plan completion through the organizational standards process and through triennial monitoring.**

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

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

**Idaho's CSBG eligible entities must complete a Community Needs Assessment at least once every three years as required through each eligible entity's CSBG contract. Each eligible entity must use this Community Needs Assessment to strategize and identify what CSBG services to provide in their community, and how to provide those services effectively. Eligible entities are required to submit their completed Community Needs Assessment to the Department and must use this information in their strategic planning process and to complete their Community Action Plan.**

**The Department ensures that eligible entities are current in their Community Needs Assessment completion through the organizational standards process and through triennial monitoring.**

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



## 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 Department monitors the CSBG eligible entities triennially. The monitor**

process includes a complete review of fiscal processes, CSBG funded programs, expenditures, and NPI's, and assures that eligible entities are using CSBG funding to support the assurances. The Department compares NPIs to planned outcomes and to ensure that the outcomes are meeting the needs of the community. The Department interviews board members, the Executive Director, and eligible entity program staff to learn how the eligible entity is using CSBG funding to meet the needs of the community.

The Department will also utilize the annual Organizational Standard reviews to ensure CSBG eligible entities are using CSBG funds in support of the assurances and according to each eligible entity's Community Action Plan.

### ***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;

The Department monitors the CSBG eligible entities triennially. The monitor process includes a complete review of fiscal processes, CSBG funded programs, expenditures, and NPIs, and assures that eligible entities are using CSBG funding to address the needs of youth in low-income communities through youth development programs. The Department compares NPIs to planned outcomes and to ensure that the outcomes are meeting the needs of the community. The Department interviews board members, the Executive Director, and eligible entity program staff to learn how the eligible entity is using CSBG funding to meet the needs of the community.

The Department will also utilize the annual Organizational Standard review to ensure CSBG eligible entities are using CSBG funds in support of the assurances and according to each entity's Community Action Plan.

### ***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)

**The Department monitors the CSBG eligible entities triennially. The monitor process includes a complete review of fiscal processes, CSBG funded programs, expenditures, and NPIs, and assures that eligible entities are using CSBG funding to support the assurances. The Department compares NPIs to planned outcomes and which helps ensure the effective use of, and coordination with, other programs related to CSBG. The Department interviews board members, the Executive Director, and eligible entity program staff to learn how the eligible entity is using CSBG funding to meet the needs of the community.**

**The Department will also utilize the annual Organizational Standard review to ensure CSBG eligible entities are using CSBG funds in support of the assurances and according to each entity’s Community Action Plan.**

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

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

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

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

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

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

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

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

**Idaho’s seven CSBG eligible entities serve all of Idaho’s 44 counties by operating**

physical offices in most counties and additional part-time offices or outreach sites when needed. This coverage allows the eligible entities to be closely connected to the communities they serve and provides access for Idahoans in all areas of the state. Each eligible entity's Community Needs Assessment identifies specific needs in their service area and allows programs to be implemented accordingly.

Eligible entities offer a range of services from short-term services such as emergency food and energy crisis intervention; to long-term services such as long-term and temporary housing job skill attainment and job placement. In addition to family-based services, the eligible entities also provide a variety of different community level interventions (such as the Youth Empowered Summer Camp (YES) which provides fun and education to low-income youth, and the Housing Education and Leasing Partnership (HELP) program which works with housing providers to help families obtain housing).

If there is a service that the eligible entity does not provide, every effort possible is made to provide the client with an appropriate referral to another community resource or partner organization. While CSBG eligible entities cannot meet all needs, each eligible entity partners with providers and businesses in their communities to fill the gaps.

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

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

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

[No response; 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.”

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

[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.”

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

**Idaho’s CSBG eligible entities have always been cultivators of innovation. CSBG allows eligible entities the flexibility to customize their program delivery approach and tailor specific services and services delivery models to their local community. Entities are given the opportunity to detail innovations in their Community Action Plans every other year, their Strategic Plans every five years, and their Needs Assessments every 2-3 years. In addition, CSBG Manager’s come together twice a year to exchange and share innovative programs and ideas.**

**Below are some examples of innovative programs planned for 2020 and 2021:**

**Eastern Idaho CAP (EICAP) has started a pilot transitional housing program. As part of the program, EICAP will assist Haven residents who are ready to transition from an Emergency Shelter (the Haven) to Transitional Housing. In efforts to ensure that our customers continue moving forward and continue working towards their goals, EICAP is leveraging private foundation funds to cover part of the rent cost and CSBG funds to support intensive case management expenses. Thus far, EICAP has assisted two clients in the successful transition from the Haven to agency managed, permanent rental housing. Both clients continue to work hard on achieving their self-determined goals and EICAP continues to measure their outcomes.**

**El Ada CAP’s mobile outreach is the primary point of contact for chronically homeless members of the community to gain access to permanent, supportive housing. Using local HMIS data and national research results, El Ada made an outreach program decision. El-Ada re-focused CSBG outreach resources to the Mobile HIV testing and education, as well as veteran outreach and directing people to Our Path Home, the community coordinated entry. In addition, El Ada is now able to provide more outreach to homebound Refugee households in Ada County. El Ada has made CSBG dollars serve more populations with mobile outreach. The overall number of homeless entries into supportive housing, including VA Supportive Housing (VASH) has increased because of a well-defined and supported coordinated entry system. As a**

community, El-Ada is helping drive Ada County toward the end of chronic homelessness.

Community Council of Idaho (CC Idaho) will hold a fourth annual turkey drive in the months leading up to November 2019. The turkey drive includes a box with ingredients to make an entire meal for Thanksgiving. Many families living in poverty are unable to purchase an expensive thanksgiving meal, therefore staff at CC Idaho collect money and food donations to provide families with a free thanksgiving meal along with education on how to properly prepare the food that was given. With the help of Albertsons, Simplot, WICAP, Cintas, Second Chance Construction, and community members, CC Idaho was able to give away over 100 turkeys to families in need last year. CSBG funds are used to provide some ingredients that were included in the meal packages that were distributed and to help cover staff costs coordinating this community-based effort.

SEICAA's Financial Literacy Program offers qualifying participants access to a Nationally Certified Credit Counselor who can help guide them through understanding and utilizing credit, credit repair, and setting and maintaining a household budget to reduce and/or eliminate unnecessary debts. As part of the program, participants work closely with the Asset Development Coordinator as they work to achieve financial stability. SEICAA's Asset Development Coordinator is heavily involved in other service organizations who may provide services to participants that would benefit in their case plans to enroll in financial literacy. Through attending information fairs, events hosted at area service organizations, and involvement on the local Head Start's Policy Council, the Asset Development Coordinator has been extremely successful in bringing awareness to the Financial Literacy Program housed at SEICAA. Since its full inception in mid-2018, SEICAA's Financial Literacy Program has regular scheduled classes every month and has enrolled more than ten individuals and families, who meet regularly with the Asset Development Coordinator to set and maintain financial goals.

#### **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.”

**In Idaho, four of the CSBG eligible entities also serve as Eligible Recipient Agencies and an additional two serve as Emergency Feeding Organizations under the United States Department of Agriculture Emergency Food and Assistance Program (TEFAP). Through TEFAP, the eligible entities receive and distribute USDA commodities to all of Idaho’s 44 counties. In addition to TEFAP foods, the eligible entities receive private food donations from community partners and distribute those donated foods to individuals and families in need. Eligible entities also work with the state’s Feeding America partner, The Idaho Foodbank, to distribute additional donated foods.**

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

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

**Note:** The state describes this assurance in the State Linkages and Communication section, items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b.

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

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

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

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

**[No response; links to 9.2 and 9.5]**

### **Federal Investigations**

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

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

[No response; links to 10.13]

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

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

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

[No response; links to 10.7]

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

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

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

[No response; links to 9.6]

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

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

**Note:** The state describes this assurance under Eligible Entity Tripartite Boards, item 11.3

[No response; links to item 11.3]



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

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

**[No response; links to items 13.5 and 13.6]**

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

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

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

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

### Validation for CSBG Eligible Entity Programmatic Narrative Sections

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

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

**[No response for this item]**

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

## SECTION 15 Federal Certifications

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

### 15.1. Lobbying

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

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

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

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

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

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

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

## 15.2. Drug-Free Workplace Requirements

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

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

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

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

*Conviction* means a finding of guilt (including a plea of nolo contendere) or imposition of

sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

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

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

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

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

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

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

- (f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -
- (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

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

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

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

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

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

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

### 15.3. Debarment

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

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

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.
- (2) The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.
- (3) The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.
- (4) The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
- (5) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.
- (6) The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.
- (7) The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and

Voluntary Exclusive-Lower Tier Covered Transaction,” provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

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

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

**Primary Covered Transactions**

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

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

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

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
- (2) The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
- (3) The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.
- (4) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.
- (5) The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.
- (6) The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
- (7) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.



- (8) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
- (9) Except for transactions authorized under paragraph five of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

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

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

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

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

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

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