

Title 18: Human Services

Part 15: Division of Community Services

Part 15 Chapter 1: Community Services Block Grant (CSBG)

Rule 15.1 Community Services Block Grant (CSBG) State Plan

Source: Miss Code Annotated 43-1-2.

Community Services Block Grant (CSBG) Model State Plan- Final FISCAL YEAR (FY) 2025

CSBG Cover Page (SF-424M)

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

Public reporting burden for this collection of information is estimated to average 31 hours per response, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Section 1

CSBG Administrative Information

1.1. Identify whether this is a one-year or a two-year plan. ☒ **One-Year** ☐ **Two-Year**

1.1 a. Provide the federal fiscal years this plan covers:

Year One: 2025

Year Two: [Click or tap here to enter text.](#)

GUIDANCE: If a state indicates “One-Year” under 1.1., they will only have to provide a response for “Year One”.

1.2. Lead Agency and authorized Official: Update the following information in relation to the lead agency designated to administer CSBG in the state, as required by Section 676(a) of the CSBG Act. Information should reflect the responses provided in the Application for Federal Assistance, SF-424M.

Has information regarding the state lead agency and authorized official changed since the last submission of the State Plan? ☐ **Yes** ☒ **No**

If yes, select the fields that have changed. [Check all the apply]

- | | | |
|----------------------------------------------|------------------------------------------|-------------------------------------|
| <input type="checkbox"/> Lead Agency | <input type="checkbox"/> Department Type | <input type="checkbox"/> Office |
| <input type="checkbox"/> Authorized Official | <input type="checkbox"/> Street Address | <input type="checkbox"/> City |
| <input type="checkbox"/> Zip Code | <input type="checkbox"/> Work Number | <input type="checkbox"/> Fax Number |
| <input type="checkbox"/> Email Address | <input type="checkbox"/> Website | |

1.2 a. Lead agency: Mississippi Department of Human Services

GUIDANCE: Please only provide the exact name of the CSBG state lead agency as designated within the designation letter and an acronym (as applicable).
EXAMPLE: Office of Community Services (OCS)

1.2 b. Cabinet or administrative department of this lead agency [Check one and provide narrative where applicable]

- ☐ Community Affairs Department
- ☐ Community Services Department
- ☐ Governor’s Office
- ☐ Health Department
- ☐ Housing Department
- ☒ Human Services Department
- ☐ Social Services Department
- ☐ Other, describe: [Click or tap here to enter text.](#)

- 1.2c. Cabinet or Administrative Department Name:** Provide the name of the cabinet or administrative department of the CSBG authorized official:
Mississippi Department of Human Services
- 1.2d. Authorized official of the lead agency:** The authorized official could be the director, secretary, commissioner etc. as assigned in the designation letter (attached under item 1.3.). The authorized official is the person indicated as authorized representative on the SF-424M.
- Name:** Robert G. Anderson
Title: Executive Director
- 1.2e. Street Address:** 200 South Lamar St.
- 1.2f. City:** Jackson
- 1.2g. State:** MS
- 1.2h. Zip Code:** 39201
- 1.2i. Telephone:** 601-359-4457
- 1.2j. Fax Number:** 601-359-4477
- 1.2k. Email Address:** bob.anderson@mdhs.ms.gov
- 1.2l. Lead Agency Website:** www.mdhs.ms.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. **See Attachment**

GUIDANCE: The designation letter should be updated whenever there is a change to the designee.
INSTRUCTIONAL NOTE: The letter should be from the chief executive officer of the state and include, at minimum, the designated state CSBG lead agency (office, department, or bureau) and title of the authorized official of the lead agency who is to administer the CSBG grant award.

- 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, select the fields that have changed. [Check all the apply]

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

1.4a. Agency Name: MDHS- Division of Community Services

1.4b. Point of Contact Name:

Name: Tina M. Ruffin

Title: Office Director

1.4c. Street Address: 200 South Lamar Street

1.4d. City: Jackson

1.4e. State: MS

1.4f. Zip Code: 39201

1.4g. Telephone Number: 601-359-4768

1.4h. Fax Number: N/A

1.4i. Email Address: tina.ruffin@mdhs.ms.gov

1.4j. Agency website: www.mdhs.ms.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 regard to the state Community Action Association changed since the last submission of the state plan? ☒Yes ☐No

If yes, select the fields that have changed. [Check all the apply]

<input type="checkbox"/> Agency Name	<input 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

1.5 a. Agency name: Mississippi Association of Community Action Agencies

1.5b. Executive Director or Point of Contact

Name: Diann Payne

Title: Interim Executive Director

1.5c. Street Address: 1538 Old Leland Rd.

1.5d. City: Greenville

1.5e. State: MS

1.5f. Zip Code: 38701

1.5g. Telephone Number: 228-243-1317

1.5h. Fax Number:

1.5i. Email Address: diann.payne@msacaa.org

1.5j. State Association Website: www.msacaa.com

**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.
N/A

GUIDANCE: The labeling of all attachments should include the question number for which the document provides supplementary information, the question heading, and the type of document provided. As an example, a state statutory document could be labeled as:
2.3. Legislation/Regulation Document, Washington D.C. Statute

- 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

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.

CSBG is administered by the Mississippi Department of Human Services (MDHS)- Division of Community Services. MDHS is a primary link between families and individuals with specific needs vital to their survival and the services available to meet those needs.

The Mississippi Department of Human Services is dedicated to serving others while providing a wide range of public assistance programs, social services and support for children, low-income individuals and families. The agency seeks to empower families so they can become self-sufficient and responsible for their future success through:

**Professional, accountable, and responsible administration of CSBG;
Development of effective partnerships with CSBG entities, MDHS-DCS, the state association and other State and Federal programs serving low-income individuals.**

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

GUIDANCE: States should consider feedback from OCS, their eligible entities, and the ACSI survey completed by eligible entities when creating their State Plan goals.

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.

The State plans to focus on extensive training for state and Subgrantees in various areas, in conjunction with T&TA plan through RPIC.

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

- 3.3 a. 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)

3.3 b. 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]

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

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

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

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

A copy of the draft state plan was emailed to the eligible entities and the state association. The State attended an association meeting to discuss the state plan and asked for comments and suggestions. The state plan was added to the Virtual ROMA website for all eligible entity staff to provide feedback. The state plan was presented at the public hearing for input and comments. Comments will be accepted through July 19, 2024.

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.

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

The State's process allows the state plan to be electronically submitted to entities which improves the efficiency of responses from all entity staff to include all levels (case workers, receptionists, etc.). We received feedback from the agencies regarding the funding distribution process and the state has made changes accordingly to some of the suggestions.

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

Year One: **75%** Year Two: Click or tap here to enter text.

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.

GUIDANCE: The targets reported here should match the future target set in the Annual Report, Section B, Table B.2.

GUIDANCE: Review the [ACSI IM](#) about setting targets for your eligible entity overall satisfaction that are realistic, reasonable, attainable, and possible.

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.

GUIDANCE: Under this question, detail how the state provided the State Plan to the public, including providing sufficient time (ideally no fewer than 30 days) for the public to provide feedback prior to the public hearing. Distribution to the public should include distribution directly to the eligible entities (e.g. via email or publication on a public website with specific notification to the eligible entities) in the state as well as any other interested parties.

The State will post the state plan (administrative procedures notice) with the Secretary of State's office no less than 30 days of the public hearing. At any time within the thirty-day public comment period, written submissions including arguments, data, and views on the proposed rule/amendment/repeal may be submitted to the State. The proposed plan is uploaded to the Virtual ROMA website for comments and feedback from eligible entities. Notice of the public hearing appeared in the Clarion Ledger newspaper, which has statewide distribution, and eleven other newspapers on June 6, 2024, and June 26, 2024. The availability of the FFY 2025 CSBG State Plan for inspection was made known in the Public Hearing announcement posted in the newspapers. The state plan was made available for public inspection by calling the MDHS-DCS, as stated in the public hearing announcement. Opportunities for comment were available during the public hearing. The State Plan was posted on the Secretary of State Office website on 6/5/2024 with a 30 day comment period from 6/5/2024-7/5/2024. The plan was also posted on our Virtual ROMA website on 6/13/2024 with a comment period of 6/13/2024-7/15/2024.

- 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.

An administrative procedures notice is filed with the Secretary of State thirty (30) calendar days before the public hearing. At any time within the thirty-day public comment period, written submissions including arguments, data, and views on the proposed rule/amendment/repeal may be submitted to the State. The proposed plan is uploaded to the Virtual ROMA website for comments and feedback from eligible entities. Notice of the public hearing appeared in the Clarion Ledger newspaper, which has statewide distribution, and eleven other newspapers on June 6, 2024, and June 26, 2024. The availability of the FFY 2025 CSBG State Plan for inspection was made known in the Public Hearing announcement posted in the newspapers. The state plan was made available for public inspection by

calling the MDHS-DCS, as stated in the public hearing announcement. Opportunities for comment were available during the public hearing. The State Plan Administrative Procedures Notice was posted on the Secretary of State website on 6/5/2024 with a comment period of 6/5/2024-7/5/2024.

- 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.
July 10, 2024	Mississippi Department of Human Services, 200 South Lamar St., Jackson, MS 39201 “Zoom Meeting”	<input type="checkbox"/> Public <input type="checkbox"/> Legislative <input checked="" type="checkbox"/> Combined	<input checked="" type="checkbox"/>
ADD a ROW function Note: States will be able to add as needed for each additional hearing.			

GUIDANCE: A combined hearing refers to having one joint public and legislative hearing.

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

See Public Hearing Notice Attachment

GUIDANCE: Supporting documentation may include, but is not limited to, agendas, sign-in sheets, transcripts, and notices/advertisements of the hearings. All attachments should include the question number, question heading, type of document and the date of the hearing/meeting (as applicable).

EXAMPLE NAMING CONVENTION: 4.4. Public and Legislative Hearings Agenda 062117

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.

CSBG Eligible Entity	Geographical Area Served (by county)	Public or Nonprofit	Type of Entity
AJFC Community Action Agency, Inc.	Adams, Claiborne, Copiah, Franklin, Jefferson, Lawrence, Lincoln	Nonprofit	Community Action Agency
Bolivar County CAA, Inc.	Bolivar	Nonprofit	Community Action Agency
Central Mississippi, Inc.	Attala, Carroll, Grenada, Holmes, Leflore, Montgomery, Yalobusha	Nonprofit	Community Action Agency
Coahoma Opportunities, Inc.	Coahoma	Nonprofit	Community Action Agency
Community Action of South MS	Jackson, George, Harrison	Nonprofit	Community Action Agency
Hinds County Human Resource Agency	Hinds	Public	Community Action Agency
LIFT, Inc.	Calhoun, Chickasaw, Itawamba, Lafayette, Lee, Monroe, Pontotoc, Union	Nonprofit	Community Action Agency
Mid-State Opportunity, Inc.	Desoto, Panola, Quitman, Tallahatchie, Tate, Tunica	Nonprofit	Community Action Agency
Multi-County Community Services Agency	Clarke, Jasper, Kemper, Lauderdale, Neshoba, Scott, Smith, Wayne, Newton	Nonprofit	Community Action Agency
Northeast Mississippi Community Services	Alcorn, Benton, Marshall, Prentiss, Tippah, Tishomingo	Nonprofit	Community Action Agency
Pearl River Valley Opportunity, Inc.	Covington, Forrest, Jefferson Davis, Jones, Lamar, Marion, Pearl River, Perry, Greene, Hancock, Stone	Nonprofit	Community Action Agency
Prairie Opportunity, Inc.	Choctaw, Clay, Leake, Lowndes, Noxubee, Oktibbeha, Webster, Winston	Nonprofit	Community Action Agency

South Central Community Action Agency, Inc.	Madison, Rankin, Simpson	Nonprofit	Community Action Agency
Southwest Mississippi Opportunity, Inc.	Amite, Pike, Walthall, Wilkinson	Nonprofit	Community Action Agency
Sunflower-Humphreys County Progress, Inc.	Humphreys, Sunflower	Nonprofit	Community Action Agency
Warren Washington, Issaquena Sharkey Community Action Agency, Inc.	Issaquena, Sharkey, Warren, Washington, Yazoo	Nonprofit	Community Action Agency

NOTE: WITHIN OLDC, you will not be able to add-a-row. Any additions/deletions to the Eligible Entity List should be made within the CSBG Eligible Entity List within OLDC prior to initializing a new CSBG State Plan within OLDC. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. Geographical Area Served allows for 550 characters.

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

GUIDANCE: Under *Type of Entity*, select more than one type by holding down the CTRL key while making selections.

NOTE: Whether nonprofit or public, entities that receive CSBG funds are generally considered to be Community Action Agencies for the purpose of administering CSBG. The only specific exceptions outlined in the CSBG Act are Limited Purpose Agencies, Migrant and Seasonal Farmworker organizations, and Tribes and Tribal Organizations

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

INSTRUCTIONAL NOTE: 90 percent funds are the funds a state provides to eligible entities to carry out the purposes of the CSBG Act. As described under Section 675C of the CSBG Act, a state must provide to the eligible entities “not less than 90 percent” of their CSBG allocation “made available to a state under Section 675A or 675B.

5.2. Total number of CSBG eligible entities:**16**

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

GUIDANCE: The following three questions will only need to be answered based on your response to 5.3.

- 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).

CSBG Eligible Entity	Type	Start Date	Geographical Area Served
Click or tap here to enter text.	Choose an item.	Click or tap to enter a date.	

NOTE: ADD-A-ROW FUNCTION – states can add rows as needed within OLDC. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. Geographical Area Served allows for 550 characters.

GUIDANCE: A designation refers to an entity that was not receiving funding in the previous federal fiscal year(s) and/or was not included in the previous CSBG State Plan. Re-designation refers to an entity that is already designated/receiving funds but is now receiving funds to serve an additional geographic area previously served by another entity. A permanent re-designation **must be conducted -in line with procedures outlined in Section 676A of the CSBG Act.** An interim re-designation may be noted when an entity has been identified to provide services after a voluntary relinquishment pending official designation of a permanent entity consistent with the requirements of Section 676A. See CSBG Act 676A, *Designation and Redesignation...*, for more information.

- 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.

CSBG Eligible Entity	Reason
Click or tap here to enter text.	Choose an item.

NOTE: ADD-A-ROW FUNCTION – states can add rows as needed within OLDC. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row.

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

Original CSBG Eligible Entities	Surviving CSBG Eligible Entity	New Name (as applicable)	DUNS No.
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

***NOTE: ADD-A-ROW FUNCTION** – states can add rows as needed within OLDC. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row.*

GUIDANCE: This question refers to the merger or other combinations of two or more existing CSBG eligible entities only.

Under 5.3c, please only include two or more **previously designated** eligible entities that have merged or combined in order to provide CSBG services.

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.

The State will use a modified version of the COE-developed organizational standards to comply with state policies already in place. Mississippi uses a “Community Strengths and Needs Assessment” instead of the term “community assessment”. The modified COE-developed organizational standards are:

Standard 3.1- The organization will conduct a community needs assessment yearly.

Standard 5.5- The board fills vacancies as set out in its bylaws and state board policy.

Standard 9.4- The organization submits the Annual report to MDHS-DCS.

- 6.1b. Alternative Organizational Standards:** If using an alternative set of organizational standards, attach the complete list of alternative organizational standards.

- 6.1 c. 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

Provide reason for using alternative standards [Click or tap here to enter text.](#)

Describe rigor compared to COE-developed [Click or tap here to enter text.](#)

- 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:

- 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 – Web Form

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

The State implemented a web based Smartsheet application. Standards were input into Smartsheet. Eligible entities are required to attach documents to verify standards are met. A review of the Smartsheet is conducted by the State. A letter is sent by the State to entity to list the standards not met, and a date given for the entity to respond with documentation to meet standards. If the entity has not met standards after second review, additional T&TA will be provided. A TAP will be issued after 90 days, if entity has not met standards following T&TA.

GUIDANCE: Descriptions should also include improvements to the process made since the previous year including any new processes to increase efficiency or consistency of assessments.

- 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

GUIDANCE: You will only need to respond to the following question if you responded “yes” to 6.4.

- 6.4 a.** Provide the specific eligible entities the state will exempt from meeting organizational standards and provide a description and a justification for each exemption. Total Number of Exempt Entities: **0**

CSBG Eligible Entity	Description/Justification
Click or tap here to enter text.	

NOTE: ADD-A-ROW FUNCTION – states can add rows for each additional exception. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. The Description/Justification allows for 2500 characters.

- 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: 95%** **Year Two:** Click or tap here to enter text.

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

GUIDANCE: Prior to setting the target, states should review [IM 138](#), review previous performance, and collaborate with the eligible entities and the state association to identify targets

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.

The State allocates CSBG funds by the following formula: Using the latest Census data, the number of persons in poverty by county is divided by the state total of persons in poverty to get a percentage for each county. The percentage is multiplied by the “90 percent of the total state allocation” to determine the amount of funds for each county. Each eligible entity receives the amount of funds for the counties it serves.

- 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: **Click or tap here to enter text.**

Planned CSBG 90 Percent Funds – Year One	
CSBG Eligible Entity	Funding Amount \$
Total	Please see Tentative Allocation attachment.

NOTE: WITHIN OLDC, the add-a-row function will not be available on this table and the first column is read-only. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. To auto-calculate, select the “\$0.00”, right-click, and then select “Update Field”.

Planned CSBG 90 Percent Funds – Year Two	
CSBG Eligible Entity	Funding Amount \$
Total	

NOTE: WITHIN OLDC, the add-a-row function will not be available on this table and the first column is read-only. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. To auto-calculate, select the “\$0.00”, right-click, and then select “Update Field”.

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

- 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).

The Division of Community Services sends NOFAs to the eligible entities, usually the first week of July. The eligible entities submit subgrants to DCS within 60 days after the date of the NOFA. The fiscal and program staff review the subgrants for errors/additional information. After the reviews, the subgrants are passed through the Administrative Review Memorandum process to the Division Counsel and Division Director for their review and signature approval. The subgrants are then submitted to the Executive Director's Office (EDO) for final approval. The EDO requires all subgrants be submitted 30 days prior to the effective dates. Immediately after EDO approval, DCS staff packages and distributes the subgrants to eligible entities. The program year is from January through December. Entities have current year funds until the start of the new program year.

- 7.3a. Distribution Method:** Select the option below that best describes the distribution method that the state uses to issue CSBG funds to eligible entities:

☐ Reimbursement

☐ Advance

☒ Hybrid – **Initial 2 months advance, then they are placed on cost reimbursement.**

☐ Other

- 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.
The Division of Community Services sends NOFAs to the eligible entities, usually the first week of July. The eligible entities submit subgrants to DCS within 60 days after the date of the NOFA. The fiscal and program staff review the subgrants for errors/additional information. After the reviews, the subgrants are passed through the Administrative Review Memorandum process to the Division Counsel and Division Director for their review and signature approval. The subgrants are then submitted to the Executive Director's Office (EDO) for final approval. The EDO requires all subgrants be submitted 30 days prior to the effective dates. Immediately after EDO approval, DCS staff packages and distributes the subgrants to eligible entities. Subgrantees are now able to request funds to operate their programs. The subgrants have an effective date of January 1-December 31 of each year, so funds from prior year are available.

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

- 7.5. Distribution of Funds 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 state continues to upgrade Virtual ROMA system which captures intake, determines client eligibility, and provides information on client progress. Eligible entities will be trained on new system functions. The state is revising the drawdown and cost reporting process to allow for better administration of funds.

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:** Click or tap here to enter text.
- 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: 4 **Year Two:** Click or tap here to enter text.
- 7.8. State FTEs:** Provide the number of state Full Time Equivalents (FTEs) to be funded with CSBG funds for the FFY(s) covered by this State Plan?
Year One: 4 **Year Two:** Click or tap here to enter text.
- 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**

GUIDANCE: "No" should only be selected if the percentages provided under 7.2. and 7.6. equal 100%.

If yes, provide the allocated percentage and describe the use of the remainder/discretionary funds in the table below. **Year One:** 5% **Year Two:** Click or tap here to enter text.

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

INSTRUCTIONAL NOTE: The assurance under 676(b)(2) of the Act (Item 14.2 of this State Plan) specifically requires a description of how the state intends to use remainder/discretionary funds to "support innovative community and neighborhood-based initiatives related to the purposes of [the CSBG Act]." Include this description in Item 7.9f of the table below and/or attach the information.

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

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

Use of Remainder/Discretionary Funds – Year One

Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
7.9a. Training/Technical Assistance to eligible entities	\$100,000 (17%)	These planned services/activities will be described in State Plan Item 8.1
7.9b. Coordination of state-operated programs and/or local programs	\$30,000 (5%)	These planned services/activities will be described in State Plan Section 9, State Linkages and Communication
7.9c. Statewide coordination and communication among eligible entities	\$250,00 (41%)	These planned services/activities will be described in State Plan Section 9, State Linkages and Communication
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need (Briefly describe under Column 4)	Click or tap here to enter text.	
7.9e. Asset-building programs (Briefly describe under Column 4)	Click or tap here to enter text.	
7.9f. Innovation programs/activities by eligible entities or other neighborhood groups (Briefly describe under Column 4)	\$165,000 (27%)	Funds will be used for innovative projects/activities to include senior and youth projects.
7.9g. State Charity tax credits (Briefly describe under Column 4)	Click or tap here to enter text.	
7.9h. Other activities (Specify these other activities under Column 4)	\$58,796 (10%)	Funds will be used to serve additional clients.
Totals	\$603,796	

To auto-calculate, select the "\$0.00", right-click, and then select "Update Field". Each description allows for 4000 characters.

Use of Remainder/Discretionary Funds – Year Two

Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned \$	Brief Description of Services and/or Activities
7.9a. Training/Technical Assistance to eligible entities	Click or tap here to enter text.	These planned services/activities will be described in State Plan Item 8.1
7.9b. Coordination of state-operated programs and/or local programs	Click or tap here to enter text.	These planned services/activities will be described in State Plan Section 9, State Linkages and Communication [
7.9c. Statewide coordination and communication among eligible entities	Click or tap here to enter text.	These planned services/activities will be described in State Plan Section 9, State Linkages and Communication
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need (Briefly describe under Column 4)	Click or tap here to enter text.	
7.9e. Asset-building programs (Briefly describe under Column 4)	Click or tap here to enter text.	
7.9f. Innovation programs/activities by eligible entities or other neighborhood groups (Briefly describe under Column 4)	Click or tap here to enter text.	
7.9g. State Charity tax credits (Briefly describe under Column 4)	Click or tap here to enter text.	
7.9h. Other activities (Specify these other activities under Column 4)	Click or tap here to enter text.	
Totals	\$ 0.00	

GUIDANCE: If the percentages provided under 7.2. and 7.6. do not equal 100%, the remaining percentage should be reported under 7.9. If the state does not have any remainder/ discretionary fund activities (as listed in 7.9a. – 7.9g.), the remainder should be described in 7.9h.

- 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 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 partially carries out some activities
- ☒ CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds) **16**
- ☐ 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 [Click or tap here to enter text.](#)

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 State will partner with the State Association to provide technology training and regional workshops/trainings for our licensed social workers and training on Organizational Standards and Needs Assessment.

The State will also assess eligible entities and provide T&TA through individual consultants in areas such as finance, marketing, fund-raising, etc.

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.)

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

Training and Technical Assistance – Year One

Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
Ongoing/Multiple Quarters	Technical Assistance	Organizational Standards - General	
Ongoing/Multiple Quarters	Both	Reporting	
Ongoing/Multiple Quarters	Training	Other	CSBG/LIHEAP Policy Manual
Ongoing/Multiple Quarters	Both	Technology	

NOTE: ADD-A-ROW FUNCTION – States can add rows for each additional training. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. Brief Description of "Other" allows for 500 characters.

Training and Technical Assistance – Year Two

Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
Choose an item.	Choose an item.	Choose an item.	

NOTE: ADD-A-ROW FUNCTION – States can add rows for each additional training. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. Brief Description of "Other" allows for 500 characters.

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

Year One: \$100,000 Year Two: Click or tap here to enter text.

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

The State will partner with the State Association to conduct annual training conference for eligible entities. Regional T&TA providers, OCS, NASCSP and individual consultants will be invited to provide training. The State Association will assist with T&TA for eligible entities and provide training for front-line staff.

8.2. Organizational Standards Technical Assistance: Does the state have Technical Assistance Plans (TAPs) in place for eligible entities with unmet organizational standards, if appropriate? ☒Yes ☐No

Note: 8.2 is associated with State Accountability Measure 6Sb. The state should put a TAP in place to support eligible entities with one or more unmet organizational standards.

8.2 Address Unmet Organizational Standards: Describe the state's plan to provide T/TA to eligible entities to ensure they address unmet Organizational Standards.

T&TA will be provided by the State and the State Association to assist entities in correcting deficiencies before a TAP is issued. The State will develop a TAP for entities experiencing challenges in meeting the organizational standards and require a response within 30 days of the date of the 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.)

☐All T/TA is conducted by state

☒CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds) **1**

☐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 Click or tap here to enter text.

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

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

Based on the state's performance with the Organizational Standards, the technical assistance plan will focus on providing additional training to entities meeting between 70 and 89 percent of the standards. The State will continue to work with the state association to conduct the reviews of the standards.

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
- ☐ Head Start State Collaboration offices
- ☐ 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 State has established working relationships with Dept. of Medicaid, Rehabilitation Services, Workforce Development, and internal department programs such as SNAP, Aging Programs, Youth Services, Child Support, TANF, etc. to address needs of the family. IRS, Energy Vendors, United Way, Salvation Army, Public Service Commission are other partnerships that the State maintains. We meet with them periodically regarding programs and program changes. We invite partners to our annual conference. We conduct Energy Vendor meetings annually.

- 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)).

Through case management, low-income families are assessed and referred to other DHS programs and local programs. Entities are required to develop partnerships and pool resources with social service providers, local organizations, religious organizations to increase support and opportunities for low-income families and communities, and to avoid duplication of services. To fully address the needs of families and to evaluate the outcome of their work, entities must follow up with families to ensure services were provided by the organizations they were referred to. We require as part of their proposals that they submit proof of their partnership and linkages before grants are approved.

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)).

The State requires eligible entities to submit documentation on their partnerships with other service providers and organizations as part of their community action plan in their subgrants for funding. Eligible entities link families to resources within the entity and within the community. Outcomes from these linkages are reported as part of their NPIs.

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.

Eligible entities are required as part of their community action plan to develop partnerships with local and state social service providers, religious organizations, local governments to fill gaps in the services the entity cannot provide. Referrals are made and follow up is done to ensure services were delivered. The State assures this requirement by requiring entities to submit a list of the local and other partnerships to fill gaps in their service delivery, as part of their annual subgrant for funding.

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.

- 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.

MDHS has a Division of Workforce Development which participates in the statewide WIOA employment and training activities. Eligible entities coordinate their CSBG employment and training activities with the local WIOA.

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

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

The Low-Income Home Energy Assistance Program (LIHEAP) is administered by eligible entities. They are required as part of the community action plan to coordinate LIHEAP services as part of a case plan for low-income families. Entities are required to work with local energy providers to resolve crisis situations, provide energy saving materials, and conduct energy conservation workshops. The State allocates a percentage of discretionary funds for federal or state-declared disasters to provide emergency services.

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

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

The State requires eligible entities to submit documentation on their partnerships with other service providers and organizations, including faith-based, charitable and community organizations as part of their community action plan in their subgrants for funding. The documentation addresses referrals to and from each partner, and the services to be provided by the entity and the partner. Many of these organizations are represented on the eligible entity's board of directors.

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

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

Eligible entities use their CSBG funds to leverage additional public and private resources, which assist with achieving outcomes within the framework of the national goals. CSBG resources are used to support the infrastructure of the entities to include sound governance, fiscal, programmatic, and personnel management. This results in greater accountability and capacity, thus enabling entities to leverage public and private resources through their community outreach and partnerships. As reported in the 2022 Leveraging Report, eligible entities leveraged \$2,198,255.

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

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

In FFY 2025, a percentage of CSBG discretionary funds will be contracted to the State Association to support training and technical assistance needs of the eligible entities, quality improvement, and other state-wide initiatives. The State meets with the State Association on a regular basis to discuss program requirements and updates. The State Association convenes an annual conference in which the State partners and provide training based on the topics outlined in the CSBG T&TA Plan.

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

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

Communication Plan

Subject Matter	Expected Frequency	Format	Brief Description of “Other”
Upcoming Public and/or Legislative Hearings	Annually	Email	
State Plan Development	Annually	Email	
Organizational Standards Progress	Annually	Email	
State Accountability Measures Progress	Annually	Email	
Community Needs Assessments/Community Action Plans	Annually	Letters/Hard Copies	
State Monitoring Plans and Policies	Annually	Email	
Training and Technical Assistance (T/TA) Plans	Annually	Email	
ROMA and Performance Management	Quarterly	Email	
State Interagency Coordination	Annually	Email	
CSBG Legislative/Programmatic Updates	Annually	Email	
Tripartite Board Requirements	Annually	Email	
Click or tap here to enter text.	Choose an item.	Choose an item.	

Note: ADD-A-ROW FUNCTION – States can add rows for each additional communication topic. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. Brief Description of “Other” allows for 250 characters.

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

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

GUIDANCE: Under this question, include how the state will provide information to local entities and state associations within 60 days of receiving feedback from OCS.

Communication by letter or memo will be sent to eligible entities and the State Association regarding performance on the State Accountability Measures. Entities will be asked to respond within 30 days. Emails, phone calls, and one-on-one consultations are conducted as needed.

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

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

The State will conduct compliance reviews with the entities to address issues, policy, and training needs of the entities. A report will be sent to all entities for comment before final adjustments are made. The State continues to upgrade the Virtual ROMA system, which will allow for more electronic communication to and from the State. Smartsheet and Virtual ROMA 2 (current system) are used to provide information and communication to the entities, and they can provide feedback as well.

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.

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

GUIDANCE: Monitoring that is specific to organizational standards should be referenced within Section 6, Item 6.3a.

Monitoring Schedule – Year One

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”
AJFC CAA	Full On-Site	Onsite	FY1 Q2	1/23/2023	1/27/2023	
Bolivar CAA, Inc.	Full On-Site	Onsite	FY1 Q3	5/1/2023	5/5/2023	
Central MS, Inc.	Full On-Site	Onsite	FY1 Q2	3/11/2024	3/15/2024	
Coahoma Opportunities, Inc.	Full On-Site	Desk Review	FY1 Q1	11/6/2023	11/16/2023	
Community Action of South MS	Full On-Site	Desk Review	FY1 Q1	12/11/2023	12/15/2023	
Hinds County HRA	Full On-Site	Onsite	FY1 Q1	12/4/2023	1/9/2024	
LIFT, Inc.	Full On-Site	Desk Review	FY1 Q1	12/12/2023	12/19/2023	
Mid-State Opportunity, Inc.	Full On-Site	Onsite	FY1 Q1	11/29/2023	12/5/2023	
Mississippi Association of CAA	Full On-Site	Desk Review	FY1 Q1	11/9/2023	11/15/2023	
Multi-County CSA, Inc.	Full On-Site	Onsite	FY1 Q4	9/22/2022	10/21/2022	
Northeast MS CS, Inc.	Full On-Site	Desk Review	FY1 Q4	7/25/2023	8/1/2023	

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"
Pearl River Valley Opportunity	Full On-Site	Desk Review	FY1 Q1	11/16/2023	12/11/2023	
Prairie Opportunity, Inc.	Full On-Site	Desk Review	FY1 Q1	11/15/2023	11/21/2023	
South Central CAA, Inc.	Full On-Site	Onsite	FY1 Q3	4/3/2023	4/7/2023	
Southwest MS Opportunity, Inc.	Full On-Site	Onsite	FY1 Q1	10/3/2023	12/13/2023	
Sun-Hum Counties Progress, Inc.	Full On-Site	Desk Review	FY1 Q1	11/29/2023	12/12/2023	
WWISCAA, Inc.	Full On-Site	Desk Review	FY1 Q1	11/27/2023	12/4/2023	

NOTE: WITHIN OLDC, the add-a-row function will not be available on this table and the first column is read-only. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. A Brief Description of Other allows for 500 characters.

Monitoring Schedule – Year Two

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"
Click or tap here to enter text.	Choose an item.	Choose an item.	Choose an item.	Click or tap to enter a date.	Click or tap to enter a date.	

NOTE: WITHIN OLDC, the add-a-row function will not be available on this table and the first column is read-only. To add a row within this form: highlight the row and then select the plus sign (+) at the end of the row. A Brief Description of Other allows for 500 characters.

GUIDANCE: Comprehensive monitoring includes a review of program, administrative, fiscal and organizational standards.
If you are monitoring an entity as a follow up to an issue with another program, this can be listed under "Other."
When providing the date of your last full onsite review – this could be for any type of review that took place **onsite**. No dates for desk reviews should be provided here.

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

See Attachments – Program, Fiscal Monitoring and Audit Attachment, and Compliance Monitoring Attachment

- 10.3. Initial Monitoring Reports:** According to the state's procedures, by how many calendar days must the state disseminate initial monitoring reports to local entities? **30 days**

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. [Click or tap here to enter text.](#)

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

- 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 State will notify the Office of Community Services of serious deficiencies of an eligible entity. A report will be given to OCS monthly as to the actions and technical assistance provided by the State. If a QIP is requested from an eligible entity, OCS will be notified in writing of the QIP, a copy of the QIP, the due date, and the State's approval or denial of the QIP within 30 days.

- 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. [Click or tap here to enter text.](#)

10.8 b. 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.

The State will conduct a public hearing, after giving public notice of its intention to designate an agency. The public hearing shall include an

evaluation of the administrative and programmatic capabilities of the agency or agencies under consideration for designation as the community action agency for the area. The State will submit its recommendation to the Governor's Office for designation. Special consideration will be given to any community action agency currently receiving CSBG funds and is contiguously located to the un-served service area. If no such agency exists, or if a geographic area of the state is not being served by an eligible entity, the Governor of the State of Mississippi may solicit applications from and designate as a community action agency: 1. A private non-profit organization that is geographically located in the un-served area, that is capable of providing a broad range of services to eliminate poverty and promote self-sufficiency, and that meets the requirements of the CSBG Act; 2. A private non-profit eligible entity that is geographically located contiguous to or within close proximity of the un-served area; 3. A private organization must comply with the tripartite board requirements, and submit to the State, a copy of its board of directors. 4. The board(s) of supervisors for the un-served area must approve a resolution to designate the organization as the community action agency for the county.

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

10.9 a. Termination Citation: If yes, provide the citation(s) of the law and/or regulation. [Click or tap here to enter text.](#)

- 10.9 b. 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.

In accordance with the CSBG Act, States must assure that any eligible entity that received funding in the previous year through CSBG, will not have its funding terminated or reduced below the proportional share 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 such reduction. Under Section 676C of the CSBG Act, "cause" is defined as: 1. A statewide re-distribution of funds due to: a. Results of the most recently available census data or other appropriate data; b. The designation of a new eligible entity; c. Severe economic dislocation. 2. Failure of the entity to fulfill its obligations under the CSBG subgrant agreement; 3. Ineffective or improper use of funds provided under the CSBG subgrant agreement; 4. Failure to provide assurance that the entity board will comply with the tripartite board requirements; 5. Voluntary relinquishment of the CSBG grant. If the State determines the entity has a specific deficiency, the State must notify the entity in writing of the deficiency and require the entity to correct the deficiency. The State must offer technical assistance, if appropriate, to the entity to correct the deficiency. The State will notify the Office of Community Services through a written report of the entity's deficiencies and the technical assistance provided by the State. If the State determines

that technical assistance is not appropriate, OCS must still be notified. Examples of situations where technical assistance is not appropriate include but are not limited to: 1. A deficiency for which the State has previously provided technical assistance and the entity has failed to correct deficiency; 2. Multiple, widespread, and/or repeated deficiencies that cannot be addressed through technical assistance; 3. A deficiency that involves fraudulent reporting or use of funds, or other criminal activity. Section 678C(a)(4) of the CSBG Act gives states the discretion in the implementation of a Quality Improvement Plan (QIP) by an eligible entity to address deficiencies. If the State determines an entity should be allowed to submit a QIP, the entity has 60 days to develop and implement its plan to correct deficiency. The entity must, however, submit the QIP to the State within 30 days of being notified of the deficiency. The State will review the QIP and issue a decision on whether to approve the QIP within 30 days of its receipt. If the State does not accept the QIP, the State must notify the entity of the reasons why the QIP cannot be approved. The State may issue a letter of intent to terminate or reduce funding. The entity may submit a request for a hearing within 30 calendar days of the State's letter to terminate or reduce funding. Upon receipt of entity's request for a hearing, the State must schedule an Administrative Hearing within 30 business days. If the State finds cause for termination or the reduction of funding, the State may begin process. The State must notify the entity and OCS in writing. The entity may request in writing, a federal review by the Secretary of DHHS of the State's decision to terminate or reduce funding, within 30 calendar days of the State's notification. If a request for a federal review has been made, the State may not terminate or reduce funding until DHHS responds to the request. DHHS has 90 days to complete its review. If no request for a federal review is made within the 30-day timeframe, the decision of the State is final. If the federal review is not completed within its 90 days, the decision of the State is final. If an eligible entity is terminated or relinquishes its grant, the State must provide in writing a closeout process to assist the entity in closing out the grant. The State will provide monthly reports to OCS during the entire process.

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

10.10 a. Re-Designation Citation: If yes, provide the citation(s) of the law and/or regulation. [Click or tap here to enter text.](#)

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.

The State will conduct a public hearing, after giving public notice of its intention to designate an agency. The public hearing shall include an evaluation of the administrative and programmatic capabilities of the

agency or agencies under consideration for designation as the community action agency for the area. The State will submit its recommendation to the Governor's Office for designation. Special consideration will be given to any community action agency currently receiving CSBG funds and is contiguously located to the un-served service area. If no such agency exists, or if a geographic area of the state is not being served by an eligible entity, the Governor of the State of Mississippi may solicit applications from and designate as a community action agency: 1. A private non-profit organization that is geographically located in the un-served area, that is capable of providing a broad range of services to eliminate poverty and promote self-sufficiency, and that meets the requirements of the CSBG Act; 2. A private non-profit eligible entity that is geographically located contiguous to or within close proximity of the un-served area; 3. A private organization must comply with the tripartite board requirements, and submit to the State, a copy of its board of directors. 4. The board(s) of supervisors for the un-served area must approve a resolution to designate the organization as the community action agency for the county.

GUIDANCE: Re-designation implies that an entity that is already designated/receiving funds is now performing the duties and receiving funds that were previously designated to another entity, in addition to the funding that they are already receiving. This is different from a merger as an entity is not absorbing another entity. This re-designation may be permanent (**requires a formula redistribution**) or temporary while the state has officially designated a new entity and has completed a formula redistribution. See CSBG Act 676A, *Designation and Redesignation...*, for more information.

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).

The State requires eligible entities requesting CSBG funds to submit Monthly Cost Worksheets in Smartsheet application. These worksheets show expenditures such as Case Management, Supportive Services, and Administration (by cost category and line items). Entities are required to submit Claim Support Forms to request funds based on Current Needs. These forms are processed in the MDHS-Division of Community Services. The SF-425 Federal Financial Reports are processed in this Division of Budgets & Accounting. Documentation from the Virtual ROMA system is required to support program cost shown on the Cost Worksheets and Claim Forms as a means to adhere to mandates by the Division Office of Monitoring to monitor costs reported for the month. Procedural manuals are in place which covers financial and accounting rules and regulations which entities must comply with.

Entities are required to have and submit an annual audit performed by an independent Certified Public Accountant. The State complies with the Single Audit Act Requirement.

Entities subgrants are monitored annually by the Division of Monitoring. Periodic visits may be conducted by the Division of Community Services.

- 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 Director of Monitoring and the Supervisor of Single Audit Findings review audit findings and forward them to the Division of Community Services and the Monitoring Supervisor. Audit findings are placed on a spreadsheet and addressed during monitoring visits with the entity and addressed on the monitoring report.

- 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

- 10.13a. Federal Investigations Policies:** Are state procedures for permitting and cooperating with federal investigations included in the state monitoring policies attached under 10.2? ☒Yes ☐No

- 10.13b. Closing Findings Procedures:** If no, describe state procedures for permitting and cooperating with federal investigations.

- 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 Division of Community Services will conduct desk reviews of entities and T&TA visits (up to 5 entities annually) to identify potential problems before entities are monitored by the Division of Monitoring. If the entity has findings, the Division of Community Services will assist with resolution of the finding, and possibly use this in state training for all entities.

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 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 **Provide Board training**

- 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 [Click or tap here to enter text.](#)

- 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.

The State has a Board Policy in place to ensure this requirement. The Board Policy is given to all entities and the State conducts reviews of eligible entity bylaws to ensure bylaws have policies for tripartite board representation.

- 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. [Click or tap here to enter text.](#)

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): [Click or tap here to enter text.](#)

☐ Varies by eligible entity [Click or tap here to enter text.](#)

GUIDANCE: Under *Varies by eligible entity*, provide the threshold and the reason that it varies by entity.

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

Individuals requesting assistance must complete an application to determine eligibility. The application process involves a case management approach. This approach is an interaction between the client and a caseworker. The caseworker obtains vital information about the social and economic conditions of the household to identify needs. It also helps to identify households that are at risk or in crisis, so that a service plan can be developed to assist household to become stable and self-sufficient. Elderly and disabled individuals are not required to participate in case management. Applications are entered into the Virtual ROMA 2 system which determines income eligibility.

- 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 intake procedures (where individual income verification is not possible or practical). An example of these services is emergency food assistance.

Eligible entities provide referral and outreach to communities that are known to be low-income. Low-income families are notified so that documentation of their eligibility is in the Virtual ROMA 2 system.

- 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).

Eligible entities ask for participation and partnership from other service providers and organizations that provide services to low-income communities. Low-income families are invited to participate in these meetings and events.

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 State requires entities as part of their annual subgrant for funding to submit logic models and NPIs which follow the ROMA process. Guidance is provided in the NOFA package sent to entities.

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. [Click or tap here to enter text.](#)

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

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

- ☒ CSBG National Performance Indicators (NPIs)
- ☐ NPIs and others
- ☒ Others **The State requires eligible entities to address the NPIs in their Community action plans. Entity performance in meeting goals stated in their plans will be evaluated monthly by the State.**

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

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

Eligible entities utilize ROMA as a framework for implementing case management and agency accountability. Virtual ROMA 2 is the statewide data system used to capture data. The State provides T&TA on Virtual ROMA 2 and ROMA goals. The State and the Association is working with entities to increase the number of certified ROMA trainers, implementers, and advocates.

- 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.

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

As part of the Notice of Funding Availability, the State requires eligible entities to conduct a Community Strengths and Needs Assessment. The data collected is used in their community action plans to specify what services the entity will provide to the low-income families for the program year. Entities can pull reports from the Virtual ROMA 2 system on services provided and use this data to plan services for the next program year.

Community Action Plans and Needs Assessments

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

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

In accordance with the assurance in 676(b)(11) of the CSBG Act, the State will secure from each eligible entity, as part of its annual application and as a condition of a financial award, a community action plan which provides a description of services to be provided. The community action plan includes information from the Community Strengths and Needs Assessment (CSNA) for the communities served. The CSNA provides information from several aspects of the communities to include public, private, and low-income sectors, partners, and other service providers. It provides for the ranking of services stated in the community action plan and assists with the allocation of funds for different services.

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

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

The State requires eligible entities to conduct a CSNA annually as part of their community action plan. The community action plan must include:

- a. A description of the CSNA to determine the services to be provided based on the needs of the community.**
- b. A description of outcome measures to be used to monitor success in promoting self-sufficiency, family stability, and community revitalization.**
- c. Through the use of logic models, the entity must state goals and objectives in measurable terms and projected in a timetable in which the goals and objectives will be accomplished.**
- d. A description of how the entity will provide services during a disaster, on weekends, after hours, and during emergencies.**
- e. An updated board of director's roster.**

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

14.1 a. 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;

MDHS-DCS ensures compliance with this assurance by making funds available to the sixteen (16) eligible entities. These entities use funds to support activities such as disaster assistance, job training, educational support, career development, volunteer efforts, nutritional support, health education and access, tax preparation assistance, mentoring, parenting development, childcare services, and other activities as needed for low-income families and individuals. A review of eligible entities program performance ensures these activities are accomplished and/or referred to other local and state providers. Program areas offered by entities include: Early childhood programs, economic development/education, emergency services, housing, income management, nutrition and health programs, independent living/aging programs, transportation, community improvement/quality of life programs, youth programs, and employment programs.

Needs of Youth

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

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

Entities are required as part of their community action plan to describe youth programs and activities they will sponsor to address the needs of youth. The state reviews the CAP annually to ensure these services are provided and reviews monthly progress reports to keep track of services/referrals provided. MDHS-DCS ensures compliance with this assurance by making funds available to eligible entities to conduct after school tutorial programs, summer programs, year round educational programs and activities, and summer reading programs for youth. These programs will promote educational excellence and youth development which prevents youth problems and crime. Support will be given to eligible families of the participants to ensure family needs are met through the case management process, and referrals made to other local providers.

Coordination of Other Programs

14.1c. 676(b)(1)(C) Describe how the state will assure “that funds made

available through grant or allotment will be used –

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

Through case management, low-income families are assessed and referred to other DHS programs and local programs. Entities are required to develop partnerships and pool resources with social service providers, local organizations, religious organizations to increase support and opportunities for low-income families and communities, and to avoid duplication of services. In order to fully address the needs of families and to evaluate the outcome of their work, entities must follow up with families to ensure services were provided by the organizations they were referred to.

The State requires eligible entities to submit documentation on their partnerships with other service providers and organizations as part of their community action plan in their subgrants for funding. Eligible entities link families to resources within the entity and within the community.

State Use of Discretionary

Funds

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

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

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

Eligible Entity Service Delivery, Coordination, and Innovation

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

Eligible Entity Service Delivery System

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

The service delivery system used to deliver CSBG services is provided by eligible entities to meet identified needs of eligible families and communities, and to

achieve outcomes based on the six national goals. Service delivery systems vary from entity to entity, just as the communities and people served. Commonalities to the service delivery system include:

- a. Community outreach to ensure awareness of opportunities for low-income people;
- b. Holistic, family-oriented approaches to assessing and addressing needs;
- c. Use of multiple and convenient access points for direct service delivery;
- d. Provision of multiple and wide-ranging services in order to address the causes and effects of poverty;
- e. Common, entity-wide consumer intake forms and processes and
- f. Use of community partnerships and referral processes to make the most of efficient use of available resources.

Eligible Entity Linkages – Approach to Filling Service Gaps

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

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

[No response as the state describes this assurance under 9.3b.]

Eligible entities are required as part of their community action plan to develop partnerships with local and state social services providers, religious organizations, local governments to fill gaps in the services the entity cannot provide. Referrals are made and follow up is done to ensure services were delivered. The State assures this requirement by requiring entities to submit a list of the local and other partnerships to fill gaps in their service delivery, as part of their annual subgrant for funding.

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 as the state describes this assurance under 9.7]

Eligible entities use their CSBG funds to leverage additional public and private resources, which assist with achieving outcomes within the framework of the national goals. CSBG resources are used to support the infrastructure of the entities to include sound governance, fiscal,

programmatic, and personnel management. This results in greater accountability and capacity, thus enabling entities to leverage public and private resources through their community outreach and partnerships. As reported in the 2022 Leveraging Report, eligible entities leveraged \$2,198,255.

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).

Local entities hold community events or in-office sessions to promote family and parenting in which various activities, information sharing, and referrals are done to assist families with the skills needed to strengthen their ability to provide for their families and be more engaged in the lives of their children. Eligible entities use funds to develop, implement, and support initiatives such as fatherhood, healthy marriage, and family development activities designed to enhance the quality of family life and strengthen families. Entities are encouraged to partner with other local or state service providers to convene teen, fatherhood and parental summits and training as part of family development activities. These activities will facilitate dialogue and provide valuable data for entities to use in planning services and projects to address challenges expressed by the low-income population.

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.”

Entities are required as a part of their community action plan to address the provision of food and supplies to CSBG eligible households. The state reviews their plans annually to ensure these services will be provided and reviews monthly performance reports to keep track of the services provided. Eligible entities are required to partner with their local DHS Economic Assistance offices to refer clients for expedited SNAP benefits in emergency situations. If SNAP benefits cannot be provided that same day, entities must provide nutrition assistance by

giving food vouchers to meet emergency nutritional needs. Entities are required to coordinate with local soup kitchens and food banks to meet emergency nutritional needs.

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 Section 9, State Linkages and Communication, specifically under 9.1 – 9.4b.

[No response as the state describes this assurance under Section 9.1 – 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 Section 9, State Linkages and Communication section, items 9.2 and 9.5.

[No response as the state describes this assurance under 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 Section 10, Fiscal Controls and Monitoring under 10.13.

[No response as the state describes this assurance under 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 Section 10 Fiscal Controls and Monitoring under 10.7.

[No response as the state describes this assurance under 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 Section 9 State Linkages and Communication, under 9.6.

[No response as the state describes this assurance under 9.6]

Eligible Entity Tripartite Board Representation

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

Note: The state describes this assurance in Section 11 Eligible Entity Tripartite Boards, under 11.3.

The State has a Board Policy in place to ensure this requirement. The Board Policy is given to all entities and the State conducts reviews of eligible entity bylaws to ensure bylaws have policies for tripartite board representation.

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.”

Note: The state describes this assurance in Section 13 ROMA, under 13.5 and 13.6.

[No response as the state describes this assurance under 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 Section 13 ROMA under 13.1 – 13.4.

[No response as the state describes this assurance under 13.1 – 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 Non-procurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

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

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

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

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

Employee means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All direct charge employees; (ii) All indirect charge employees unless their impact or involvement is insignificant to the performance of the grant; and, (iii) Temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of 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 Non-procurement Programs.
- (9) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
- (10) Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

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

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

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

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

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
- (2) The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other 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 Non-procurement Programs.

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

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

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

ATTACHMENTS

ATTACHMENT-LETTER OF DESIGNATION



State of Mississippi

TATE REEVES
Governor

August 15, 2024

Dr. Lanikue Howard, Director
Office of Community Services
Administration for Children and Families
U.S. Department of Health and Human Services
370 L'Enfant Promenade, S.W., 5th Floor, West
Washington, D.C. 20024

Dear Dr. Howard:

I hereby authorize Mr. Robert G. ("Bob") Anderson, Executive Director of the Mississippi Department of Human Services (MDHS) to be the official signature authority for all assurances by the U.S. Department of Health and Human Services for the Community Services Block Grant (CSBG) and Low-Income Home Energy Assistance Program (LIHEAP) grant applications outlined in the respective statute, as amended. I, Tate Reeves, Governor of the State of Mississippi delegate my authority to Mr. Anderson, Executive Director of MDHS to certify to the 16 assurances outlined in the Low-Income Home Energy Assistance Act of 1981, as amended, and otherwise perform all necessary functions to properly administer the Low-Income Home Energy Assistance Program.

If you have any questions or need any additional information, please contact Mr. Anderson at (601)359-4457 or P.O. Box 352, Jackson, Mississippi 39205.

Sincerely,

A handwritten signature in blue ink that reads "Tate Reeves".

Tate Reeves
Governor

cc: Mr. Bob Anderson (Bob.Anderson@mdhs.ms.gov)



Robert G. Anderson
Executive Director

July 29, 2024

Dr. Lanique Howard, Director
Office of Community Services
Administration for Children and Families
U.S. Department of Health and Human Services
370 L'Enfant Promenade, S.W., 5th Floor, West
Washington, D.C.

Dear Dr. Howard:

I hereby authorize the Director of the Division of Community Services (DCS) of the Mississippi Department of Human Services (MDHS), to be the official designee of signature authority for all funds appropriated to MDHS-DCS by the U.S. Department of Health and Human Services for the On-Line Data Collection System (OLDC) purpose only. In addition, I authorize the Director of the Division of Community Services to sign all assurances for the Community Services Block Grant (CSBG) and Low-Income Home Energy Assistance Program (LIHEAP) grant applications outlined in the respective statutes, as amended. I, Bob Anderson, Executive Director of MDHS delegate my authority to the Director of the Division of Community Services to certify to the 16 assurances outlined in the Low-Income Home Energy Assistance Act of 1981, as amended, and otherwise perform all necessary functions to properly administer the Low-Income Home Energy Assistance Program.

The Director of the Division of Community Services, Ms. Tina Ruffin, will serve as the state liaison for the implementation of the CSBG and LIHEAP programs. All routine correspondence from your office should be directed to Ms. Ruffin and you may contact her directly at P.O. Box 352, Jackson, Mississippi 39205 or telephone (601)359-4768.

Sincerely,

A handwritten signature in blue ink that reads "Robert G. Anderson". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Robert G. "Bob" Anderson
Executive Director

BA:tr

200 S. Lamar St., P.O. Box 352 | Jackson, MS 39205 | (601) 359-4500

Offering Mississippians young and old tangible help today to create lasting hope for tomorrow.

ATTACHMENT- PUBLIC HEARING LEGAL NOTICE

**MISSISSIPPI DEPARTMENT OF HUMAN SERVICES
DIVISION OF COMMUNITY SERVICES
MEMORANDUM**

TO: Veronica Ratliff
Division of Procurement Services

FROM: Nicole McBeath
Division of Community Services

DATE: May 28, 2024

SUBJECT: Publication of Legal Notice

The Division of Community Services requests that a legal notice concerning the Legislative Public Hearing on the Community Services Block Grant and Low-Income Home Energy Assistance Programs be published in the classified section of the twelve newspapers listed (See attachment). The information should be advertised on **June 6, 2024 and June 26, 2024** in each newspaper. **Please send us the copies of the newspaper advertisements from three different publishers as soon as they are announced.**

Should you have any questions, please contact Nicole McBeath at 601-359-4765.

TMR:nm

Attachments

LEGAL GRANTS
(Block Grants)
MISSISSIPPI DEPARTMENT OF
HUMAN SERVICES
Division of Community Services
Legislative Public Hearing

The Mississippi Department of Human Services, Division of Community Services will be conducting the Legislative Public Hearing on the Community Services Block Grant and Low-Income Home Energy Assistance Programs under Title 26 of the Omnibus Budget Reconciliation Act of 1981, as amended. The hearing for the 2025 programs is scheduled for Wednesday, July 10, 2024, at 11:00 am through Zoom meeting by the Mississippi Department of Human Services. Participants can join the Zoom meeting via <https://mdhs.zoom.us/j/88650140272?pwd=N1ZOQmVXMTV3dS84Nm9jMVZNUCtXdz09>, Meeting ID: 886 5014 0272, Passcode: 707360, or through One tap mobile: +13092053325,,88650140272#,,,,*707360# US, or +13126266799,,88650140272#,,,,*707360# US (Chicago). If lines are busy, please try one of the following numbers, +1 646 876 9923 US (New York), +1 301 715 8592 US (Washington DC), or +1 346 248 7799 US (Houston), and the meeting ID: 886 5014 0272, Passcode: 707360.

The Community Services Block Grant provides funds for a range of activities to ameliorate the causes and effects of poverty. For Fiscal Year 2025, at least 90 percent of the funds allocated to the State through these grants will be contracted to non-profit community action agencies, migrant seasonal farm worker organizations or community-based organizations that meet the eligibility requirements as described in Section 675 of the Community Services Block Grant Act, as amended. The eligibility requirements for the program are outlined in the application process.

The Low-Income Home Energy Assistance Program assists eligible households to pay the costs of home energy bills and other energy-related services, for example, wood, kerosene, electricity, gas, heaters, blankets, fans, and air conditioners. For Fiscal Year 2025, at least 90 percent of the funds allocated to the State through these grants will be contracted to private, nonprofit, and public agencies designated in accordance with Public Law 97-35, as amended. The eligibility requirements for the program are outlined in the application process.

Copies of the state plans are available for review at the Mississippi Department of Human Services by calling 601-359-4768 or 1-800-421-0762.

Inquiries, comments, or suggestions regarding the block grant plans and/or eligibility requirements must be received on or before July 19, 2024, by the Division of Community Services, P. O. Box 352, Jackson, Mississippi 39205. Public comments will be reviewed before finalizing the 2025 State Plans for these programs.

Mississippi Department of Human Services
Division of Community Services

NEWSPAPERS

- | | | | |
|----|---------------------------------------------------------------------------------|-----|---------------------------------------------------------------------------------------|
| 1. | The Jackson Advocate
115 East Hamilton
Jackson, MS 39202 | 7. | The Clarion Ledger
Post Office Box 40
Jackson, MS 39205-0040 |
| 2. | The Natchez Democrat
Post Office Box 1447
Natchez, MS 39121-39221 | 8. | The Vicksburg Evening Post
Post Office Box 951
Vicksburg, MS 39180 |
| 3. | The Commercial Dispatch
Post Office Box 511
Columbus, MS 39703 | 9. | The Northeast MS Daily Journal
Post Office Box 909
Tupelo, MS 38801 |
| 4. | The Delta Democrat Times
Post Office Box 1618
Greenville, MS 38701 | 10. | The Hattiesburg American
Post Office Box 1111
Hattiesburg, MS 39401 |
| 5. | The Daily Corinthian
Post Office Box 119
Corinth, MS 38834 | 11. | The Clarksdale Press Registrar
Post Office Box 1119
Clarksdale, MS 38614 |
| 6. | The Gulf Publishing Company
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ATTACHMENT- 2024 CSBG & LIHEAP PUBLIC HEARING AGENDA

**MISSISSIPPI DEPARTMENT OF HUMAN SERVICES
DIVISION OF COMMUNITY SERVICES**

**LEGISLATIVE PUBLIC HEARING
2025 LIHEAP & CSBG PROGRAMS**

**Zoom Meeting
200 South Lamar Street
Jackson, Mississippi**

**Wednesday, July 10, 2024
11:00 a.m.**

AGENDA

Opening Remarks and Introduction.....Nicole McBeath
Deputy Director

Purpose of Hearing

Presentation of FY 2025 State Plans:

- LIHEAP.....Nicole McBeath
Deputy Director

Questions/Comments.....Attendees

- CSBG.....Jessica Davis
Program Director

Questions/Comments.....Attendees

Roll Call

Closing Remarks

ATTACHMENT- PUBLIC COMMENT

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**MISSISSIPPI DEPARTMENT OF HUMAN SERVICES
DIVISION OF COMMUNITY SERVICES**

**LEGISLATIVE PUBLIC HEARING
2025 LIHEAP & CSBG PROGRAMS**

**Taken via
remote conferencing on Wednesday,
July 10, 2024,
beginning at 11:08 a.m.**

**REPORTED BY:
CHRISTA SHERMAN, CCR #1964**

**Jackson
Gulfport**

**Brooks Court Reporting
1-800-245-3376**

**Meridian
New Orleans**

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<p>1 APPEARANCES:</p> <p>2</p> <p>3 NICOLE MCBEATH, Deputy Director</p> <p>4 MS Department of Human Services</p> <p>5 Division of Community Services</p> <p>6 750 North State Street, 6th Floor</p> <p>7 Jackson, Mississippi</p> <p>8 nicole.mcbeath@mdhs.ms.gov</p> <p>9</p> <p>10 JESSICA DAVIS, Program Director</p> <p>11 MS Department of Human Services</p> <p>12 Division of Community Services</p> <p>13 750 North State Street, 6th Floor</p> <p>14 Jackson, Mississippi</p> <p>15 jessica.davis@mdhs.ms.gov</p> <p>16</p> <p>17 TINA RUFFIN, Director of Community Services</p> <p>18 MS Department of Human Services</p> <p>19 Division of Community Services</p> <p>20 750 North State Street, 6th Floor</p> <p>21 Jackson, Mississippi</p> <p>22 tina.ruffin@mdhs.ms.gov</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 MS. MCBEATH: Good morning, everyone. I</p> <p>2 apologize for the delay.</p> <p>3 (Off the record discussion.)</p> <p>4 MS. MCBEATH: Okay. Well, at this time,</p> <p>5 I would like for everybody to mute their</p> <p>6 devices.</p> <p>7 We have a court reporter on the Zoom</p> <p>8 call, like always, to transcribe our minutes</p> <p>9 for the public hearing.</p> <p>10 The agenda will be as follows: We'll</p> <p>11 have the opening remarks and introduction;</p> <p>12 purpose of the hearing; presentation of</p> <p>13 federal fiscal year 2025 State plans, LIHEAP;</p> <p>14 then questions and comments; then the CSBG</p> <p>15 presentation; questions and comments; roll</p> <p>16 call; and then closing remarks.</p> <p>17 Now, on behalf of the Mississippi</p> <p>18 Department of Human Services, under the</p> <p>19 leadership of Mr. Bob Anderson, the executive</p> <p>20 director; Tina Ruffin, the director of the</p> <p>21 Division of Community Services; and I am</p> <p>22 Nicole McBeath, Deputy Director of Community</p> <p>23 Services. And we welcome you to the federal</p> <p>24 fiscal year 2025 virtual legislative public</p> <p>25 hearing for the Community Service Block Grant</p>
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<p>1 INDEX</p> <p>2 Style.....1</p> <p>3 Appearances.....2</p> <p>4 Index3</p> <p>5 Certificate of Court Reporter26</p> <p>6 AGENDA</p> <p>7 Introduction4</p> <p>8 Purpose5</p> <p>9 Presentation LIHEAP7</p> <p>10 Questions/Comments14</p> <p>11 Presentation CSBG14</p> <p>12 Questions/Comments20</p> <p>13 Roll Call21</p> <p>14 Closing Remarks24</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 and the Low Income Home Energy Assistance</p> <p>2 Program at the Mississippi Department of</p> <p>3 Human Services at 11:00 a.m.</p> <p>4 The purpose of this hearing is to inform</p> <p>5 the public of the CSBG application pursuant</p> <p>6 to 676AC3 of the Community Service Block</p> <p>7 Threat Act and the LIHEAP application under</p> <p>8 Title 26 of the Omnibus Budget Reconciliation</p> <p>9 Act of 1981, as amended.</p> <p>10 Evidence that a legislative public</p> <p>11 hearing on the State plans were conducted and</p> <p>12 that the plans were made available for a</p> <p>13 public inspection and review must be</p> <p>14 submitted with the State plans. We hold a</p> <p>15 hearing annually to present the goals and</p> <p>16 objectives of the plans for the funding of</p> <p>17 the CSBG and LIHEAP program to the Department</p> <p>18 of Health and Human Services.</p> <p>19 Please feel free to make comments, ask</p> <p>20 questions, and participate in this important</p> <p>21 session. And we look forward to your</p> <p>22 continued support in the year of 2025.</p> <p>23 (Off the record discussion.)</p> <p>24 MS. MCBEATH: At this time, I would like</p> <p>25 to take this opportunity --</p>

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<p>1 (Off the record discussion.)</p> <p>2 MS. MCBEATH: Are there any elected</p> <p>3 officials attending this Zoom meeting?</p> <p>4 MS. HUMPHREY-GRIMES: Yes.</p> <p>5 MS. MCBEATH: Okay. What's your name?</p> <p>6 And state your title.</p> <p>7 MS. HUMPHREY-GRIMES: Good morning. This</p> <p>8 is Verna Humphrey-Grimes, and I am an</p> <p>9 alderwoman in the city of Fayette,</p> <p>10 Mississippi. I also serve on the executive</p> <p>11 board of directors for AJFC Jefferson County.</p> <p>12 MS. MCBEATH: All right. Thank you.</p> <p>13 Appreciate you attending.</p> <p>14 MS. HUMPHREY-GRIMES: You're welcome.</p> <p>15 MS. MCBEATH: Please mute your phone if</p> <p>16 you're talking to someone else.</p> <p>17 Is there anyone else before we move on?</p> <p>18 MR. MAGEE: Yes. This James Magee. I'm</p> <p>19 an alderman in Brookhaven, Mississippi, also</p> <p>20 a board member.</p> <p>21 MS. PAYNE: Nicole, this is Diann Payne.</p> <p>22 MS. MCBEATH: Okay. Good morning,</p> <p>23 Diann. There's someone with you?</p> <p>24 MS. PAYNE: Good morning, everybody.</p> <p>25 MS. MCBEATH: Okay. We're going to go</p>	<p>1 members (disabled, elderly, children, and</p> <p>2 veterans) while at the same time reducing the</p> <p>3 client's burden of energy costs/consumption;</p> <p>4 to increase energy affordability for LIHEAP</p> <p>5 recipient households; to identify households</p> <p>6 with the highest Energy Burden and offer Case</p> <p>7 Management to provide additional services to</p> <p>8 include household resources; perform</p> <p>9 leveraging activities to serve additional</p> <p>10 LIHEAP clients or provide a greater level of</p> <p>11 assistance to stabilize clients.</p> <p>12 The next bullet has been added back to</p> <p>13 the program, which is LIHEAP weatherization.</p> <p>14 It's to perform whole-house weatherization</p> <p>15 measures to a designated number of homes</p> <p>16 using LIHEAP funds, targeting households in</p> <p>17 which at least one member is either elderly,</p> <p>18 disabled, or a small child to reduce the</p> <p>19 energy cost/consumption of the household.</p> <p>20 And then there's low income people,</p> <p>21 especially vulnerable populations, achieve</p> <p>22 their potential by strengthening family and</p> <p>23 other supportive services through referrals.</p> <p>24 And at this time -- and at this time I</p> <p>25 would turn it over to Tina Ruffin to provide</p>
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<p>1 ahead and start the presentation.</p> <p>2 Purpose of LIHEAP: The LIHEAP statute,</p> <p>3 Title 26 of the Omnibus Budget Reconciliation</p> <p>4 Act of 1981, states that the purpose of</p> <p>5 LIHEAP is to assist eligible households with</p> <p>6 the cost of their home energy bills such as</p> <p>7 electricity, gas, kerosene, wood, etc., and</p> <p>8 other energy-related services like air</p> <p>9 conditioners, heaters, hot water heaters,</p> <p>10 blankets, and fans.</p> <p>11 LIHEAP defines "vulnerable population"</p> <p>12 as children zero to five years of age, older</p> <p>13 adults with chronic health conditions,</p> <p>14 homeless persons, low income people, disabled</p> <p>15 persons. And studies have shown that high</p> <p>16 outdoor temps leads to higher indoor temps,</p> <p>17 especially for certain structures, which</p> <p>18 means pre-existing health risk makes these</p> <p>19 populations more vulnerable.</p> <p>20 These are the LIHEAP goals, and they</p> <p>21 are: To target and provide financial</p> <p>22 assistance and consumer education to all</p> <p>23 low-income households being served,</p> <p>24 considering both energy consumption and</p> <p>25 vulnerability of one or more household</p>	<p>1 a little bit more details on the new LIHEAP</p> <p>2 weatherization measures.</p> <p>3 MS. RUFFIN: Good morning. The State</p> <p>4 for federal fiscal year 2025 will allocate 10</p> <p>5 percent of the State award to the LIHEAP</p> <p>6 weatherization program. The purpose is to</p> <p>7 allow us to raise funds from LIHEAP and CSBG,</p> <p>8 which would allow us to afford more funds to</p> <p>9 go to the weatherization of homes.</p> <p>10 The weatherization average cost per unit</p> <p>11 is a little bit over \$8,400. We will propose</p> <p>12 an average cost per home of \$12,000 from the</p> <p>13 LIHEAP weatherization program, which would</p> <p>14 allow us to weatherize upwards of \$20,000 for</p> <p>15 a home. Some of the measures which will be</p> <p>16 paid for out of LIHEAP organization will be:</p> <p>17 Heating and coolant system</p> <p>18 repair/replacement; minor roof repair; door</p> <p>19 replacement; other basic measures such as</p> <p>20 power strips and LED lighting; appliance</p> <p>21 replacement or repair, such as the</p> <p>22 refrigerator, hot water heater, or stove;</p> <p>23 electrical repairs such as wiring issues</p> <p>24 within the home; storm windows; windows; and</p> <p>25 also some insulation costs.</p>

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<p>1 Now, the weatherization program has a 2 small amount of money called readiness funds, 3 so we will – readiness funds and incidental 4 funds. So we will use those funds before we 5 tap into LIHEAP weatherization for things 6 such as door replacement, minor roof repair, 7 and some of the smaller repairs. 8 But that will be awarded to the current 9 weatherization agencies to allow them to 10 grade those funds to provide more services to 11 those weatherization clients who are in need 12 of the services. 13 MS. MCBEATH: Thank you, Tina. 14 This next slide is the LIHEAP benefits 15 matrix. The Federal LIHEAP Act stipulates 16 that households with the lowest income 17 receive the greatest LIHEAP benefits. The 18 maximum amount a client can receive per 19 program year from January 1 to December 31st 20 is \$1,500. And based on the income, limits 21 may be less than maximum benefits. 22 LIHEAP benefits are grouped and capped 23 by energy types such as electricity, natural 24 gas, propane, other fuel, wood. And each 25 energy type has a maximum benefit.</p>	<p>1 number of people in the household exceeds 20 2 members, please contact community service for 3 the annual income. 4 Okay. Sorry, y'all. This next screen 5 is the 2025 LIHEAP Tentative Allocations by 6 Agencies, which is based on the 2024 LIHEAP 7 Award. Once DCS receives the 2025 final 8 award, these allocations will be revised 9 through modifications. 10 Now, I'll give y'all a moment to look at 11 your allocations. Most of you should have 12 already received it anyway because I've 13 mailed out the note for the end of June as 14 well as emailed the information. 15 This next slide is the Federal Fiscal 16 Year 2023 LIHEAP Household Report. 17 Households served for the period of 18 October 1, 2022, through 9/30/2023: For 19 heating, there was a total of 30,253 20 households; cooling was 28,668 households; 21 year-round crisis was 8,222 households; 22 emergency equipment was 2,264 households; any 23 type of LIHEAP assistance was 46,243 24 households, and this number is unduplicated; 25 the payment assistance is 45,954 households.</p>
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<p>1 This is an example of a LIHEAP benefit 2 matrix showing the different income levels 3 and household size. So, for example, a 4 household size of one with income between 5 zero to \$3,765, can receive 800 in propane, 6 700 in electric or 700 in natural gas, 400 7 for wood/other fuel for a maximum benefit of 8 \$1,500. And if the house is totally 9 electric, they can receive a full amount of 10 \$1,500. And as you can see on this slide, as 11 the income for a household size of one goes 12 up, the benefit amount goes down. 13 The 2025 Federal Poverty Guidelines with 14 CSBG LIHEAP effective October 1, 2024. The 15 first column is the number of households of 16 one to 20 members. The second column is the 17 Federal Poverty Guidelines annual income. 18 The third column is the CSBG Federal Poverty 19 Guidelines, and Jessica will address that in 20 her presentation. 21 The last column is the Federal Poverty 22 Guidelines for the LIHEAP program and it is 23 60 percent of the State median income. So a 24 household size of one is eligible for LIHEAP 25 if they make \$25,687 or less. And if the</p>	<p>1 These are the LIHEAP community action 2 agencies that we administer the funds to and 3 the counties they serve. 4 We have AJFC; Bolivar County; Central 5 Mississippi, Incorporated; Coahoma 6 Opportunities, Incorporated; Community Action 7 of South Mississippi; Hinds County Human 8 Resource Agency; LIFT Incorporated; Madison 9 County Citizen Service Agency; Mid-State 10 Opportunities; Multi County Community Service 11 Agency; Northeast Mississippi Community 12 Services; PRVO; Prairie Opportunity; 13 South Central Community Action Agency; 14 Southwest Mississippi Opportunity; 15 Sunflower-Humphreys Counties Progress; and 16 WWISCAA. 17 Legislative Public Hearing Requirements. 18 Legislative public hearing, federal fiscal 19 year 2025, CSBG LIHEAP legislative public 20 hearing held on July 10, 2024. Notice of the 21 public hearing appeared in twelve different 22 newspapers statewide. 23 Public Inspection of the Plan, federal 24 fiscal year 2025, CSBG/LIHEAP State Plan 25 availability for inspection was made known in</p>

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<p>1 the public hearing announcement described 2 above.</p> <p>3 Opportunities for comments were also 4 available during the virtual public hearing 5 held on July 10, 2024, via Zoom meeting, via 6 email to tina.ruffin@mdhs.ms.gov, or mail to 7 the Mississippi Department of Human Services, 8 200 South Lamar Street, Jackson, Mississippi 9 39201. Also, any comments that need to be 10 made need to be sent in by the end of July.</p> <p>11 At this time, I would like to turn it 12 over for any questions, comments, or 13 concerns. If you do have any, please make 14 sure you unmute your device, and state your 15 name and agency and organization you are 16 representing for the court reporter.</p> <p>17 No comments, questions before we move 18 on?</p> <p>19 Okay. Well, I will now turn it over to 20 Jessica Davis for the CSBG presentation.</p> <p>21 MS. DAVIS: Good morning. I'm Jessica 22 Davis. I'm the program director for the 23 Department of Human Services Division of 24 Community Services. CSBG serves as the State 25 of Mississippi's application for federal CSBG</p>	<p>1 secure and retain meaningful employment; to 2 attain an adequate education; make better use 3 of available income; achieve greater 4 participation in the affairs of the community 5 involved; obtain and maintain adequate 6 housing and suitable living environment; 7 obtain emergency assistance through the 8 loans, grants, or other means to meet 9 immediate, urgent family and individual 10 needs.</p> <p>11 The Goals, Objectives, and Assurances: 12 Sponsor financial literacy certifications for 13 CAA staff, and certified staff can provide 14 financial counseling to case management 15 clients; assist clients in obtaining new 16 skills for the Work From home economy to 17 include distance learning initiatives; engage 18 and support clients to access and expand 19 their skill set to obtain meaningful 20 employment or new careers; emphasize the need 21 for legal, effective, and quality board of 22 directors, ensuring more diversity in service 23 delivery, community involvement, and 24 partnerships; establishing a Leadership 25 Institute to promote leadership skills to</p>
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<p>1 funding. The State plan describes 2 Mississippi's proposed use of federal fiscal 3 year 2025 CSBG funding to produce positive 4 outcomes for the elimination of the causes 5 and effects of poverty.</p> <p>6 As Nicole mentioned, these are also our 7 CSBG community action agencies that provide 8 CSBG funding with the exception of Madison 9 County Citizen Services Agency.</p> <p>10 Legislative public hearing was held 11 today on July 10, 2024. The public hearing 12 appeared in twelve different newspapers 13 statewide. The federal fiscal year 2025 CSBG 14 and LIHEAP State plan was made available for 15 inspection in the public hearing announcement 16 described above. Opportunities for comment 17 can be made either here, during the meeting, 18 or to Ms. Tina Ruffin at 19 tina.ruffin@mdhs.ms.gov or via mail at 20 Mississippi Department of Human Services at 21 200 South Lamar Street, Jackson, Mississippi 22 39201.</p> <p>23 The purposes of CSBG funds are to: 24 Remove the obstacles and solve problems that 25 block the achievement of self sufficiency;</p>	<p>1 upcoming CAA staff to achieve effective 2 succession planning.</p> <p>3 The Distribution of Allocation of Funds. 4 In accordance within the CSBG Act: 5 90 percent of the State of Mississippi's 6 total allocation must be distributed to the 7 State's eligible entities; 25 percent of each 8 eligible entity's allocation must be 9 allocated to the Supportive Services activity 10 for direct client services; 15 percent of 11 each eligible entity's allocation may be used 12 for the Administrative Activity; and last -- 13 the last 60 percent of eligible entity's 14 allocation may be used for the Case 15 Management activity.</p> <p>16 The Distribution and Use of 17 Discretionary Funds: MDHS/DCS will allocate 18 at least 5 percent of CSBG funds received by 19 the State to support discretionary projects 20 related to the purposes of the CSBG Act and 21 the six national goals.</p> <p>22 A percentage of discretionary funds are 23 allocated based on the following activities: 24 Capacity building at 66 percent, which is 25 T&TA, IT needs for the virtual enrollment</p>

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<p>1 system and training of staff; other purposes 2 are at 34 percent, which includes new and 3 existing community projects for seniors and 4 youth. 5 The Federal Poverty Guidelines effective 6 October 1, 2024, for the 120 percent 7 category, for a household of one that – a 8 family can make – well, a person can make 9 \$18,825 and the amount increases by \$6,725 10 for each person. 11 2025 CSBG Tentative Allocations. As 12 Nicole mentioned, she has already sent these 13 out to you all, but we'll look at them 14 briefly. 15 Case Management Services. What can be 16 done with the CSBG – the CSBG grants. 17 Employment: Job training services and 18 assistance, employment services and 19 assistance, work support services and 20 assistance, and vocational training can be 21 provided. 22 Under Education and Cognitive 23 Development: Adult Basic Education, General 24 Equivalency Degree preparation, and tuition 25 assistance.</p>	<p>1 people who obtained employment up to a living 2 wage. There were 407 people who obtained a 3 living wage or higher. There were 208 4 individuals who obtained a high school 5 diploma or GED. 262 employees – I'm sorry. 6 262 individuals who recognize – who got a 7 certificate or a degree in vocational fields, 8 66 individuals who obtained associate's 9 degree, and 17 who obtained a bachelor's 10 degree. 11 Under the Income and Asset Building, 12 there were 187 people that received a savings 13 account or IDA. There were 26 people who 14 improved their credit score, and eight who 15 increased their net worth. 16 1,872 people maintained or obtained safe 17 and affordable housing. 2,860 people avoided 18 eviction, and 702 avoided foreclosure. 19 8,340 people – seniors – I'm sorry – 20 65 and up maintained an adequate living 21 situation, and 5,873 individuals maintained 22 an independent situation. 23 That concludes the CSBG portion of the 24 public hearing. 25 Are there any questions, comments, or</p>
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<p>1 Housing services, housing financial 2 assistance, weatherization services, 3 transitional shelter, and homeownership 4 counseling can be provided. 5 Income and Asset Building, which 6 includes LIHEAP assistance, money management 7 education, budget preparation, income 8 management assistance, consumer credit 9 counseling, and tax preparation assistance. 10 Health and Social/Behavioral Development 11 includes: Weatherization services, health 12 education training, medical/dental assistance 13 services, and Social Security benefit claims 14 assistance. 15 Emergency Services include: Temporary 16 housing assistance, energy crisis assistance, 17 emergency food and clothing, and spousal 18 support/crisis intervention. 19 And, lastly, Nutrition includes: 20 Nutritional education training and meal 21 assistance. 22 During the year 2023 -- during the year 23 2023, we served over a thousand people who 24 obtained -- I'm sorry. 25 During the year 2023, there were 1,123</p>	<p>1 concerns? 2 If there's no questions, comments, or 3 concerns for the CSBG portion, I'll turn it 4 back over to Nicole McBeath. 5 MS. MCBEATH: Okay. At this time, we'll 6 go ahead and start the roll call. I'm going 7 to start with the agencies first. As I call 8 out your name, unmute your device and just 9 say present. 10 Also, sign-in sheets are to be emailed 11 to me listing all participants in attendance 12 no later than by close of business today. 13 AJFC? 14 SPEAKER: Present. 15 MS. MCBEATH: Thank you. Everybody. 16 Make sure your phones are muted until I call 17 your agency out. 18 Bolivar? 19 SPEAKER: Present. 20 MS. MCBEATH: Thank you. 21 CMI? 22 SPEAKER: Present. 23 MS. MCBEATH: Thank you. 24 Coahoma? 25 SPEAKER: Present.</p>


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<p>1 MS. MCBEATH: CASM? Community Action of 2 South Mississippi? 3 SPEAKER: Present. 4 MS. MCBEATH: Thank you. 5 Hinds County? 6 SPEAKER: Present. 7 MS. MCBEATH: Thank you. 8 LIFT? 9 SPEAKER: Present. 10 MS. MCBEATH: Thank you. 11 Madison? 12 SPEAKER: Present. 13 MS. MCBEATH: Thank you. 14 Mid-State? 15 SPEAKER: Present. 16 MS. MCBEATH: Multi-County? 17 SPEAKER: Present. 18 MS. MCBEATH: Northeast Mississippi? 19 SPEAKER: Present. 20 MS. MCBEATH: PRVO? 21 SPEAKER: Present. 22 MR. MAGEE: Prairie Opportunity? 23 SPEAKER: Present. 24 SPEAKERS: Present. 25 MS. MCBEATH: South Central?</p>	<p>1 MS. BENTLEY: Likeba Bentley. 2 MS. TIMMS: Candice Timms. 3 MS. RUFFIN: Tina Ruffin. 4 MS. MCBEATH: And, of course, Nicole 5 McBeath. 6 Are there any other participants on the 7 phone, the Zoom call? 8 MS. JAMES: Jacqueline James. 9 MS. MCBEATH: Okay. 10 MS. JONES: Dedra Jones. 11 MS. TUCKER: Eloise Tucker. 12 MS. MCBEATH: Anyone else? 13 MS. JACKSON: Lacara Jackson. 14 MS. MCBEATH: We don't need the agency. 15 We just needed one person from the agency. 16 You all are sending a series of participants 17 to us. 18 MS. ANDREWS: Melvela Andrews. 19 MS. MCBEATH: So are there any other 20 participants outside of the agency in the 21 State agency staff? 22 Okay, again, like Jessica said, this 23 concludes our 2025 CSBG/LIHEAP public 24 hearing. And I would like to thank you all, 25 everyone for attending this year's virtual</p>
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<p>1 SPEAKERS: Present. 2 MS. MCBEATH: SMO? 3 SPEAKERS: Present. 4 MS. MCBEATH: Sun-Hum. We only need one 5 person -- 6 SPEAKER: Present. 7 MS. MCBEATH: So that was 8 Sunflower-Humphreys, right? 9 SPEAKER: Yes. 10 MS. MCBEATH: Thank you. WWISCAA? 11 SPEAKER: Present. 12 MS. MCBEATH: MACAA? 13 SPEAKER: Present. 14 MS. MCBEATH: All right. Thank you all 15 so much. And, again, don't forget to send in 16 the sign-in sheets later. 17 Now we'll start here at the State office 18 with our staff. 19 MS. PORTIS: Lorraine Portis. 20 MS. DAVIS: Jessica Davis. 21 MS. PERKINS: Francis Perkins. 22 MS. PITTMAN: Gwendolyn Pittman. 23 MS. POPE: Latoya Pope. 24 MS. JACKSON: Alicia Jackson. 25 MR. MCSWAIN: Paul McSwain.</p>	<p>1 public hearing and for all the hard work that 2 you all do in making, and continue to make, 3 these programs successful. We truly 4 appreciate everything that you do. And 5 please keep up the good work. 6 We will end the public hearing now, but 7 I would like all the agencies to stay on for 8 a brief meeting regarding the notice. 9 (Time noted: 11:42 a.m.) 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>

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<p style="text-align: right;">Page 26</p> <p>1 CERTIFICATE OF COURT REPORTER 2 I, Christa Sherman, Court Reporter and 3 Notary Public, in and for the State of 4 Mississippi, hereby certify that the foregoing 5 contains a true and correct transcript of the 6 Mississippi Department of Human Services, Division 7 of Community Services, Legislative Public Hearing, 8 2025 LIHEAP & CSBG Programs, as taken by me in the 9 aforementioned matter at the time and place 10 heretofore stated. 11 I further certify that, to the best of 12 my knowledge, I am not in the employ of or related 13 to any party in this matter and have no interest, 14 monetary or otherwise, in the final outcome of 15 this matter. 16 Witness my signature and seal this the 17 22nd day of July, 2024. 18 19  20 CHRISTA SHERMAN, CCR #1964 21 My Commission Expires: October 19, 2027 22 23 24 25</p>	

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ATTACHMENT-ELIGIBLE ENTITIES

AJFC (Nonprofit)
P.O. Box 3011
8 Feltus St.
Natchez, MS 39120
(601) 442-8681 or 1-855-443-8681
Fax (601) 442-9572
Chief Executive Officer: Zadier Thomas

Adams, Claiborne, Copiah, Franklin, Jefferson, Lawrence and Lincoln

Bolivar County (Nonprofit)
810 East Sunflower Road
Suite 120
Cleveland, MS 38732
(662) 846-1491
Fax (662) 283-2352
Executive Director: Elnora Littleton

Bolivar

Central Mississippi, Inc. (Nonprofit)
P.O. Box 749
101 South Central Ave.
Winona, MS 38967
(662) 283-4781
Fax (662) 283-2352
Chief Executive Officer: Pamela Gary

Attala, Carroll, Grenada, Holmes, Leflore, Montgomery and Yalobusha

Coahoma Opportunities, Inc. (Nonprofit)
P.O. Box 1445
115 Issaquena Ave.
Clarksdale, MS 38614
(662) 624-4887
Fax (662) 624-4915
Executive Director: Edward Seals

Coahoma

Community Action of South MS
P.O. Box 8723
5343 Jefferson Street
Moss Point, MS 39562
(228) 769-3292
Fax (228)769-3264
Executive Director: Vanessa Gibson

(Nonprofit)

Harrison, George, and Jackson

Hinds County Human Resource Agency
P.O. Box 22657
258 Maddox Road
Jackson, MS 39212
(601) 923-3930
Fax (601)923-3925
President/CEO: Kenn Cockrell

(Public)

Hinds

LIFT, Incorporated
2577 McCullough Blvd.
Belden, MS 38826
(662) 842-9511 or 1-800-844-5438
Fax (662)842-5575
Executive Director: Dorothy Leasy

(Nonprofit)

Calhoun, Chickasaw, Itawamba, Lafayette, Lee, Monroe, Pontotoc and Union

Mid-State Opportunities Inc.
P.O. Box 270
204 North Church Street
Charleston, MS 38921
(662) 647-2463 or 1-800-523-6683
Fax (662)647-5868
Executive Director: Lynda Bradford

(Nonprofit)

Panola, Quitman, Tallahatchie, Tunica, Tate and Desoto

Multi-County CSA
P.O. Box 905
2906 St. Paul Street
Meridian, MS 39302
(601) 483-4838 or 1-800-898-0659
Fax (601)428-9861
Executive Director: Ronald Collier

(Nonprofit)

Clarke, Jasper, Kemper, Lauderdale, Neshoba, Newton, Scott, Smith and Wayne

Northeast MS CS (Nonprofit)
P.O. Box 930
801 Hatchie Street
Booneville, MS 38829
(662) 728-2118 or 1-877-728-2118
Fax (662)728-8720
Executive Director: Steve Gaines

Alcorn, Benton, Marshall, Prentiss, Tippah and Tishomingo

Pearl River Valley Opportunity (PRVO) (Nonprofit)
P.O. Box 188
756 Hwy. 98 Bypass
Columbia, MS 39429
(601) 736-9564 or 1-866-736-9564
Fax (601)736-6288
Executive Director: Thomas Morris

Covington, Greene, Hancock, Forrest, Jefferson Davis, Lamar, Marion, Pearl River, Jones, Perry, and Stone

Prairie Opportunity (Nonprofit)
P.O. Box 1526
501 Hwy. 12 West
Suite 110
Starkville, MS 39759
(662) 323-3397 or 1-888-397-5550
Fax (662)323-8754
Executive Director: Laura Marshall

Choctaw, Clay, Leake, Lowndes, Noxubee, Oktibbeha, Webster and Winston

South Central Community Action Agency (Nonprofit)
P.O. Box 6590
3891 I-55 South Frontage Road
Jackson, MS 39212
(769) 235-8224 or 1-866-313-2905
Fax (769)251-1017
Executive Director: Sheletta Buckley

Madison, Rankin and Simpson

Southwest Mississippi Opportunities (Nonprofit)
P.O. Box 1667
4116 Hwy. 51 South
McComb, MS 39649
(601) 684-5593 or 1-800-250-7730
Fax (601)249-3996
Executive Director: Keisha Butler

Amite, Pike, Walthall and Wilkinson

Sunflower-Humphreys
P.O. Box 908
414 Martin Luther King Dr.
Indianola, MS 38751
(662) 887-1431
Fax (662)887-4888
Executive Director: Monica Hope

(Nonprofit)

Humphreys and Sunflower

WWISCAA
P.O. Box 1813
1538 Old Leland Road
Greenville, MS 38701
(662) 378-5857 or 1-800-820-8204
Fax (662)332-5191
Executive Director: Jannis Williams

(Nonprofit)

Issaquena, Sharkey, Warren, Washington and Yazoo

ATTACHMENT- TENTATIVE FFY 2025 ALLOCATIONS

These levels are dependent on the Federal CSBG award at the FFY 2024 level. Adjustments will be made once the final FFY 2025 awards are known.)	
Eligible Entities	Estimated Allocation
AJFC CAA	\$577,108
Bolivar County CAA	\$163,025
Central Mississippi	\$524,940
Coahoma Opportunities	\$167,372
Community Action of South MS	\$1,165,084
Hinds County HRA	\$1,151,281
LIFT, Inc	\$883,594
Mid-State Opportunity Inc.	\$741,219
Multi-County CSA	\$906,418
Northeast MS CS	\$517,332
PRVO, Inc.	\$1,474,831
Prairie Opportunity, Inc.	\$766,977
South Central CAA	\$683,617
Southwest MS Opportunity	\$366,262
Sunflower-Humphreys CP	\$197,803
WWISCAA, Inc.	\$581,455
Total	\$10,868,318

ATTACHMENT-PROGRAM, FISCAL MONITORING AND AUDIT**Statutory reference 2605 (b)(10)****Fiscal, Accounting and Tracking Requirements**

The State requires Subgrantees requesting CSBG funds to submit Monthly Cost Worksheets in Smartsheet. These Cost Worksheets show expenditures such as Case Management, Supportive Services and Administration (by cost category and line items). Subgrantees are required to submit Claim Support Forms (to request funds) based on current needs. Federal funds made available to the State under this title will disburse administrative and programmatic funds to Subgrantees in accordance with the CSBG Act, and the overall contractual allocation for each subgrantee regulates the maximum allowable expenditures. The draw down requests and expenditures reports, are reviewed, processed, and tracked in the Division of Community Services. The SF-425 Federal Fiscal Reports (FFR) are generated in the MDHS-Division of Budgets & Accounting as well as the monthly Budget Status reports for DCS verification and tracking. Documentation from Virtual ROMA will be required to support costs reflected on Cost Worksheets and Claims Support Forms as a means to adhere to mandates by Division of Monitoring to monitor costs reported for the month. Procedural manuals are in place which cover a range of fiscal and accounting rules and regulations with which Subgrantees must comply. Also, to further account for LIHEAP federal funds, 13 of 16 DCS Subgrantees use the same accounting software, GMS, which allows tracking through Virtual ROMA. It allows easy access in training new personnel, as well as existing personnel in the effective use of the GMS software and DCS requirements.

Subgrantees are required to have and submit an annual audit performed annually by an independent Certified Public Accountant. Also, the State complies with the Single Audit Act requirement.

The State continuously provides training and technical assistance to the subgrantees on program and fiscal management to enhance program compliance and quality service delivery to eligible households, and special training for new staff to ensure program compliance.

Subgrants will be monitored bi-annually by the Division of Monitoring. Periodic reviews to the subgrantee, both announced and unannounced will be conducted by the Division of Community Services.

The Director of Monitoring reviews audit findings and forward them to the Division of Community Services and the Monitoring Supervisor. Audit findings are placed on a spreadsheet and addressed during monitoring visits with the entity and addressed on the monitoring report.

ATTACHMENT-COMPLIANCE MONITORING

Statutory Reference 2605(b)(10)

Division of Monitoring (DPI)

MONITORING

The Mississippi Department of Human Services (MDHS) is required to monitor the activities of its subgrantees by following the Single Audit Act Amendments of 1996, the Office of Management and Budget (OMB) Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*, and the OMB Circular A-133 Compliance Supplement. MDHS shall monitor each project, program, subgrant, function, or activity supported by a Federal award to assure compliance with applicable Federal regulations and that performance goals are achieved.

POLICY

MDHS has established uniform monitoring policies designed to ensure that all subgrants under the jurisdiction of MDHS are administered in compliance with Federal requirements and with the terms of the subgrant agreements. Monitoring subgrants, for compliance with the applicable Federal regulations, State laws, Agency policies, and the terms of the subgrant agreements, is the responsibility of the MDHS Division of Monitoring.

Subgrant monitoring procedures may include several of the various options available. These options include: reviewing reports submitted by the subgrantee; reviewing documentation supporting expenses reported under MDHS subgrants; reviewing the subgrantee's single audit or program-specific audit results and evaluating audit findings and the subgrantee's corrective action plan; performing on-site reviews of fiscal and programmatic records and observing subgrantee operations; and/or, arranging for limited scope audits of specific compliance areas.

Planning Considerations

When determining the extent of monitoring procedures to perform, MDHS will consider factors such as the amount of the subgrant, the percentage of a Federal program's total funds awarded to subgrantees, and the complexity of the compliance requirements. To determine the appropriateness of monitoring procedures, MDHS will consider the cost-effectiveness of monitoring procedures compared to the relative size and complexity of the Federal awards administered by the subgrantee. The following factors will also be considered when determining the monitoring procedures to be performed to ensure compliance with the Federal regulations, State laws, Agency policies and procedures, and the terms of the subgrant agreement:

1. The amount of the subgrant in relation to the total amount of the program;
2. Prior experience of the subgrantee operating subgrants supported by Federal funds;

3. Results of the MDHS follow-up on prior year single audit findings;
4. Results of the review of documents submitted by the subgrantee;
5. Results of the desk review of supporting documentation for expenditures;
6. Results of previous on-site fiscal and programmatic reviews; and/or,

Monitoring Procedures

1. Review of Reports Submitted by Subgrantees

Subgrants may be monitored by reviewing reports submitted by the subgrantee for compliance with the subgrant agreement and program instructions. For example, the monthly reporting worksheets may be reviewed for accuracy and completeness or the quarterly programmatic report may be reviewed to ensure that each element of the Scope of Services is being met.

2. Review of Supporting Documentation for Expenditures

Subgrants may be monitored by performing a desk review of supporting documentation for expenditures reported under the subgrant. This review consists of contacting the subgrantee and requesting documents to support certain amounts included on the subgrantee's reporting worksheets. These documents will be examined by the monitors to determine compliance with the subgrant agreement and with State and Federal regulations. The results of the desk review will be communicated in a written report to the subgrantee and to the MDHS Funding Division.

Desk reviews may be conducted at any time by staff of the MDHS, Division of Monitoring. The desk review procedure may be used in lieu of or in conjunction with an on-site fiscal review or as a follow-up to an on-site fiscal review to ensure that corrective actions have been implemented.

Fiscal monitoring through a desk review will include, at a minimum, a review of all documents to support all expenses reported for one month of the subgrant period. Documents shall be reviewed to support costs reported on the reporting worksheet submitted for the month in which the highest dollar amount of expenses was reported as of the date that the schedule letter was prepared to begin the desk review and request support documents.

When fiscal monitoring is initiated through a desk review and sufficient documents are not provided by the subgrantee/contractor to support costs reported on the reporting worksheet, the desk review shall cease, and fiscal monitoring shall be completed through an on-site review.

Fiscal monitoring shall not be performed through a desk review on the first subgrant awarded to a subgrantee. In addition, monitoring through a desk review shall be alternated with on-site reviews so that on-site fiscal monitoring is performed at least every other year.

Monitoring for programmatic compliance cannot be performed through a desk review.

3. Review of the Subgrantee's Single Audit Report for Compliance, Evaluation of Audit Findings, and Follow-up on Corrective Actions

Subgrantees that expend \$500,000.00 or more of Federal financial assistance during the subgrantee's fiscal year shall have an audit performed by an independent Certified Public Accountant in accordance with the Single Audit Act and OMB Circular A-133. As a part of MDHS' monitoring of each of its subgrants, these independent auditor's reports shall be obtained from the subgrantees and reviewed for compliance with Federal regulations.

Any audit findings identified in the independent auditor's reports, as well as the subgrantees proposed corrective action plans, shall be evaluated by the MDHS Funding Divisions. If the subgrantee's corrective action plan is acceptable, a management decision will be issued by the MDHS Funding Division to resolve the audit findings. The MDHS Division of Monitoring will follow-up on the subgrantee's corrective action plan during the next on-site fiscal review that is conducted.

4. On-Site Reviews for Program Compliance

On-site reviews for program compliance are required to be conducted at least once during the subgrant period for every MDHS subgrant. On-site reviews for program compliance may be performed on any subgrant at any time and may be repeated as often as deemed necessary by MDHS. These reviews for program compliance will be conducted by the MDHS Division of Monitoring.

The on-site programmatic reviews are formal in nature and are normally preceded by written notification to the subgrantee and to the appropriate MDHS Funding Division Directors. However, unannounced on-site programmatic reviews may also be conducted. On-site entrance and exit conferences will be conducted with subgrantee officials and a written report will be issued communicating the results of the review to the subgrantee and to the MDHS Funding Divisions. The Agency shall follow-up on the subgrantee's corrective action plan for any programmatic monitoring findings.

5. On-Site Reviews for Fiscal Compliance

On-site reviews for fiscal compliance will be conducted by the Division of Monitoring, as provided under this section. These visits may also be conducted at the request of the MDHS Executive Director or the MDHS Funding Division Director.

These reviews are formal in nature and are normally preceded by written notification to the subgrantee. The appropriate Funding Division Directors shall also receive written notification of on-site fiscal reviews. However, unannounced on-site fiscal reviews may also be conducted. On-site entrance conferences will be conducted with subgrantee officials. Exit conferences will be conducted and a written report will be issued communicating the results of the review to the

subgrantee and to the MDHS Funding Divisions. MDHS shall follow-up on the subgrantee's corrective action plan for any fiscal monitoring findings.

6. Limited Scope Audits of Specific Compliance Areas

The Agency may engage an independent Certified Public Accountant to perform a Limited Scope Audit of certain MDHS subgrants. The need for this type of review shall be determined on an individual basis and shall be documented by the Division of Monitoring. The results of this review shall be communicated to the subgrantee and to the MDHS Funding Divisions in a written report.

Corrective Action Process

The Initial Report of Findings and Recommendations that is forwarded to the subgrantee and to the MDHS funding division shall require a written response from the subgrantee within fifteen (15) working days. Upon receipt of the response from the subgrantee, the Director of the Division of Monitoring and other appropriate staff shall assess each response for adequacy. If all responses are adequate, a letter will be issued to the subgrantee clearing all findings. If any responses do not adequately address the findings, the subgrantee will be notified in writing by the issuance of a Status Report acceptable to MDHS requiring a second response from the subgrantee within ten (10) working days.

If the subgrantee fails to satisfactorily resolve all of the monitoring findings, the Division of Monitoring will issue a Final Notice Letter to the subgrantee demanding that the subgrantee refund the amount of questioned costs and advising the subgrantee of the procedures to follow if they wish to request an administrative hearing with the MDHS Executive Director.

If the subgrantee does not respond to the Final Notice Letter, the subgrantee will be referred to the State of Mississippi Office of the Attorney General to recover the unresolved questioned costs, and the Agency may begin procedures for debarment and suspension against the subgrantee organization and the subgrantee authorized official.

Discovery of Possible Fraud, Mismanagement, or Program Abuse

In the event indications of possible fraud, mismanagement, or program abuse are discovered during the course of monitoring subgrants, the Director of the Division of Monitoring shall notify the Chief Compliance Officer, who shall notify the MDHS Inspector General. The MDHS Inspector General and appropriate personnel will decide the course of action to be taken, including the degree of disclosure to subgrantee personnel and to the MDHS Funding Divisions. The format for reporting such incidents will be determined by the Chief Compliance Officer and/or the MDHS Inspector General.

Division of Community Services (DCS)**Statutory Reference 2605(b)(10)****TRAINING AND TECHNICAL ASSISTANCE (T&TA)**

DCS staff uses several tools and checklists to conduct an overall comprehensive review of the agencies' operations. Throughout both the programmatic and fiscal review process there should be ongoing, open communication with the staff to facilitate clarification of facts and prevent misunderstandings, provide the reviewer with a full understanding of the agencies' operations, and provide the agency with a full understanding of the review process.

Preliminary areas of noncompliance should be summarized and discussed with the Executive Director and/or designated staff during the exit conference. Copies of specific documents, supporting schedules, and reports obtained during the site visit to facilitate preparation of the report should be discussed during the exit conference. The agency is given the opportunity to provide comments and present additional information or explanation regarding a specific finding before it is included in the report.

The report should include specific timelines for any required corrective action associated with each finding. Copies of the report should be mailed to agency's Board and the agency's Executive Director. A copy should also be provided to the DCS Program Director and Compliance Officer.

The agency is required to respond in writing to each of the findings and observations mentioned in the report, including a detailed plan for taking corrective actions and implementing required changes. The initial response is due within 30 days from the date of the report. The agency's plan for resolution and corrective action will be reviewed by Compliance Team to ensure that all findings have been adequately addressed.

In the event an agency is unable or unwilling to correct a specified area of noncompliance within the prescribed timeline, DCS will report the deficiency to MDHS-Inspector General. If MDHS determines that the agency remains noncompliance in a specified area, DCS may contact DHHS to initiate proceedings to terminate the organization's designation as a Community Action Agency.

Division of Community Services (DCS)

Statutory Reference 2605(b)(10)

FEDERAL (SINGLE) AUDIT MANAGEMENT LETTER



**STATE OF MISSISSIPPI
OFFICE OF THE STATE AUDITOR
SHAD WHITE
STATE AUDITOR**

July 18, 2023

Single Audit Management Report

Robert Anderson, Executive Director
Mississippi Department of Human Services
200 South Lamar St.
Jackson, MS 39201

Dear Mr. Anderson:

Enclosed for your review is the single audit findings for the Mississippi Department of Human Services for Fiscal Year 2022. In these findings, the Auditor's Office recommends the Mississippi Department of Human Services:

Single Audit Findings:

1. Strengthen Controls to Ensure Compliance with the Federal Funding Accountability and Transparency Act (FFATA) Reporting Requirements.
2. Strengthen Controls Over Subrecipient Monitoring for the Child Care Development Fund (CCDF) and Temporary Assistance for Needy Families (TANF) Programs.
3. Strengthen Controls Over On-site Monitoring Requirements for the Low Income Home Energy Assistance (LIHEAP) Program.

Please review the recommendations and submit a plan to implement them by July 28, 2023. The enclosed findings contain more information about our recommendations.

During future engagements, we may review the findings in this management report to ensure procedures have been initiated to address these findings.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance on each major federal program and the results of that testing based on the requirements of *Office of Management and Budget's Uniform Guidance*. Accordingly, this report is not suitable for any other purpose. However, this report is a matter of public record and its distribution is not limited.

I hope you find our recommendations enable the Mississippi Department of Human Services to carry out its mission more efficiently. I appreciate the cooperation and courtesy extended by the officials and employees of the Mississippi Department of Human Services. If you have any questions or need more information, please contact me.

Sincerely,

A handwritten signature in blue ink that reads "Angela Mire".

Angela Mire, CPA
Director, Financial and Compliance Audit Division
Enclosures

Mississippi Department of Human Services
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SINGLE AUDIT FINDINGS

In conjunction with our audit of federal assistance received by the State of Mississippi, the Office of the State Auditor has completed its audit of the State's major federal programs administered by the Mississippi Department of Human Services for the year ended June 30, 2022.

Our procedures and tests cannot and do not provide absolute assurance that all federal legal requirements have been met. In accordance with *Section 7-7-211, Mississippi Code Annotated (1972)*, the Office of the State Auditor, when deemed necessary, may conduct additional procedures and tests of transactions for this or other fiscal years to ensure compliance with legal requirements.

Report on Compliance for Each Major Federal Program

We have audited the Mississippi Department of Human Services' compliance with the types of compliance requirements identified as subject to audit in the OMB *Compliance Supplement* that could have a direct and material effect on the federal programs selected for audit that are administered by the Mississippi Department of Human Services for the year ended June 30, 2022.

Responsibilities of Management for Compliance

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules, and provisions of contracts or grant agreements applicable to Mississippi Department of Human Services's federal programs.

Auditor's Responsibilities for the Audit of Compliance

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on the State of Mississippi's compliance based on our audit. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards, *Government Auditing Standards*, and the Uniform Guidance will always detect material noncompliance when it exists. The risk of not detecting material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material if there is a substantial likelihood that, individually or in the aggregate, it would influence the judgment made by a reasonable user of the report on compliance about Mississippi Department of Human Services' compliance with the requirements of each major federal program as a whole.

In performing an audit in accordance with generally accepted auditing standards, *Government Auditing Standards*, and the Uniform Guidance, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material noncompliance, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding Mississippi Department of Human Services' compliance with the compliance requirements referred to above and performing such other procedures as we considered necessary in the circumstances.

Mississippi Department of Human Services
 July 18, 2023
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- Obtain an understanding of Mississippi Department of Human Services' internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of Mississippi Department of Human Services' internal control over compliance. Accordingly, no such opinion is expressed.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

Other Matters

The results of our auditing procedures disclosed other instances of noncompliance which are required to be reported in accordance with the Uniform Guidance and which are described in the accompanying schedule of findings and questioned costs as items **2022-019, 2022-018, and 2022-017**.

Report on Internal Control over Compliance

A *deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the Auditor's Responsibilities for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance and therefore, material weaknesses or significant deficiencies may exist that were not identified. However, we identified certain deficiencies in internal control over compliance described in the accompanying schedule of findings and questioned costs as items **2022-019, 2022-018, and 2022-017** to be material weaknesses.

Our audit was not designed for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, no such opinion is expressed.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

Mississippi Department of Human Services
 July 18, 2023
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Findings and Recommendations

REPORTING

Material Weakness

Material Noncompliance

2022-019 Strengthen Controls to Ensure Compliance with the Federal Funding Accountability and Transparency Act (FFATA) Reporting Requirements

ALN Number 93.558 Temporary Assistance for Needy Families (TANF)
 93.667 Social Services Block Grant (SSBG)
 93.568 Low Income Home Energy Assistance (LIHEAP)
 10.542 and 10.649 Pandemic EBT Benefits
 93.596 and 93.575 Child Care Development Fund (CCDF)

Federal Award No.	G2201MSTANF	G2201MSCCDM	G2201MSLIEA
	G2201MSCCDD	G2201MSSOSR	225MS410S9007

Federal Agency Department of Health and Human Services

Pass-through Entity N/A

Questioned Costs N/A

Criteria Per the *Code of Federal Regulations (2 cfr 170.200)*, “(a) federal awarding agencies are required to publicly report Federal awards that equal or exceed the micro-purchase threshold and publish the required information on a public-facing, OMB-designated, government wide website and follow Uniform Guidance to support Transparency Act implementation. (b) Federal awarding agencies that obtain post-award data on subaward obligations outside of this policy should take the necessary steps to ensure that their recipients are not required, due to the combination of agency-specific and Transparency Act reporting requirements, to submit the same or similar data multiple times during a given reporting period.”

The Internal Control – Integrated Framework published by the Committee of Sponsoring Organizations of the Treadway Commission (COSO) and the U.S. Government Accountability Office Standards for Internal Control in the Federal Government (Green Book) specifies that a satisfactory control environment is only effective when control activities exist. This includes but is not limited to the entity determining which laws and regulations apply to the entity and setting objectives that incorporate these requirements.

Condition When performing testwork related to Federal Funding Accountability and Transparency Act (FFATA) Reporting as of June 30, 2022, the auditor noted that the Mississippi Department of Human Services (MDHS) did not perform reporting over FFATA for Temporary Assistance for Needy Families (TANF), Child Care Development Fund (CCDF), Low Income Energy Assistance Program (LIHEAP), and Pandemic EBT as required by the *Code of Federal Regulations (2 cfr 170.200)*.

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Cause	MDHS staff failed to follow grant regulations requiring FFATA reporting.
Effect	Failure to report any applicable awards and subawards resulted in MDHS being in noncompliance with federal reporting requirements and could result in a misstatement of federal expenditures to the federal awarding agency.
Recommendation	We recommend the Mississippi Department of Human Services strengthen controls to ensure compliance with the Federal Funding Accountability and Transparency Act (FFATA) Reporting.
Repeat Finding	Yes, 2021-010.
Statistically Valid	No.

SUBRECIPIENT MONITORING

Material Weakness

Material Noncompliance

2022-017	<u>Strengthen Controls over On-Site Monitoring for the Low Income Home Energy Assistance Program (LIHEAP).</u>	
ALN Number	93.568 Low Income Home Energy Assistance (LIHEAP)	
Federal Award No.	G2001MSLIE4 2001MSE5C3	G2101MSLIEAR
Federal Agency	Department of Health and Human Services	
Pass-through Entity	N/A	
Questioned Costs	None	
Criteria	<p>The terms and conditions of the grant agreements between the Mississippi Department of Human Services (MDHS) and the U.S. Department of Health and Human Services require MDHS to administer grants in compliance with the <i>Code of Federal Regulations (2 cfr Part 200)</i>. The <i>Code of Federal Regulations (2 cfr Part 200.331)</i> designates MDHS as a pass through entity to properly identify subgrant requirements to subrecipients, evaluate the risk of noncompliance for each subrecipient, and monitor the activities of subrecipients as necessary to ensure that subgrants are used for authorized purposes, complies with the terms and conditions of the subgrants and achieves performance goals.</p> <p>The auditor evaluated the Mississippi Department of Human Services' (MDHS's) compliance with subrecipient monitoring requirements based on written policies and procedures designed by MDHS's Office of Compliance – Division of Monitoring (DM) to satisfy during-the-award monitoring requirements. DM procedures require: an on-site monitoring review of each subrecipient contract at least once during the subgrant period. Monitoring tools/checklists are used during each on-site monitoring review to provide</p>	

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guidance and to document a review was performed. The on-site monitoring workpapers are reviewed and approved by DM supervisory personnel prior to issuance of a written report, the Initial Report of Findings & Recommendations, which is used for communicating finding(s) and/or questioned costs to subrecipients. The written report should be issued within 60 days from the date of the exit conference, which is normally held on the last day of the on-site review. Additionally, if the initial report identifies any administrative findings or questioned costs, a response to the findings is required to be submitted by the subrecipient to DM within thirty (30) working days from the date the report was issued.

Additionally, *The Internal Control – Integrated Framework published by the Committee of Sponsoring Organizations of the Treadway Commission (COSO) Manual* specifies that a satisfactory control environment is only effective when there are adequate control activities in place. Effective control activities dictate that: the agency perform appropriate multi-level reviews over the monitoring process and the agency ensures timely communication from the subgrantees and timely resolution of findings in order to prevent; detect; and deter fraud, waste, and abuse or the misuse of federal funds.

Condition

When performing testwork over subrecipient on-site monitoring for 123 subgrant contracts during state fiscal year 2021, we noted the following exceptions:

- Four instances, or 3 percent, in which the Supervisor's Checklist was not included for Subrecipient on the FY 2021 Monitoring Reviews Smartsheet; therefore, auditor could not verify Supervisory Review of the Monitoring process.
- Two instances, 2 percent, in which Initial Report was not issued within 60 working days of the exit conference.
- One instance, or 1 percent, in which the Division of Monitoring did not receive a response from a subrecipient in regards to the Initial Finding Letter, or the response was not received within 30 days of the receipt of the Initial Findings Letter.
- Three instances, or 2 percent, in which auditor could not verify clearance or resolution of monitoring findings.

Cause

Staff were either unaware or did not follow identified policies and procedures for monitoring requirements.

Effect

MDHS programmatic funding divisions rely upon DM monitoring procedures to verify compliance with program regulations and to identify potential problem areas needing corrective action. Failure to properly monitor subrecipients in an effective manner could allow noncompliance with federal regulations to occur and go undetected, potentially resulting in questioned costs.

Recommendation

We recommend the Mississippi Department of Human Services' Office of Compliance – Division of Monitoring (DM) strengthen controls over subrecipient monitoring. We also recommend the agency ensure subgrants are monitored timely and that the "Report of Findings & Recommendations" prepared as a result of the on-site monitoring be issued in a timely manner to enable immediate corrective action procedures to be initiated. Additionally, we

Mississippi Department of Human Services
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recommend that the agency maintain all supporting monitoring tools, reports, and correspondence in the monitoring file.

Repeat Finding Yes, 2021-013; 2020-030 in 2020; 2019-042 in 2019; 2018-046 in 2018; 2017-037.

Statistically Valid No.

Material Weakness
Material Noncompliance

2022-018 Strengthen Controls over Subrecipient Monitoring to Ensure Compliance with Uniform Guidance Auditing Requirements.

ALN Number 93.558 Temporary Assistance for Needy Families (TANF)
 93.575, 93.596 Child Care Development Fund (CCDF)

Federal Award No. G2001MSTANF
 G2001MSCCDF

Federal Agency Department of Health and Human Services

Pass-through Entity N/A

Questioned Costs None

Criteria The *Code of Federal Regulations (2 cfr §200.331(f))* states all pass-through entities (PTE's) must verify that every subrecipient is audited as required by Subpart F - Audit Requirements of this part when it is expected that the subrecipient's Federal awards expended during the respective fiscal year equaled or exceeded the threshold set forth in § 200.501 Audit requirements.

The *Code of Federal Regulations (2 cfr § 200.512(a)(1))* states the audit must be completed and the data collection form described in paragraph (b) of this section and reporting package described in paragraph (c) of this section must be submitted within the earlier of 30 calendar days after receipt of the auditor's report(s), or nine months after the end of the audit period. If the due date falls on a Saturday, Sunday, or Federal holiday, the reporting package is due the next business day.

Additionally, per the MDHS Subgrant/Agreement Manual: All MDHS subgrantees are required to complete the MDHS Subgrantee Audit Information Form (MDHS-DPI-002). This form must be submitted to the Division of Monitoring no later than ninety (90) calendar days after the end of the subgrantee's fiscal year. This form is necessary to certify the sources and amounts of all Federal awards received and expended by the subgrantee.

Condition When performing testwork related to OMB Single Audit Monitoring as of June 30, 2022, the auditor noted two instances in which the Mississippi Department of

Division of Community Services (DCS)

Statutory Reference 2605(b)(10)

BOARD POLICY

MISSISSIPPI DEPARTMENT OF HUMAN SERVICES DIVISION OF COMMUNITY SERVICES

**BOARD POLICY
FOR
COMMUNITY SERVICES BLOCK GRANT ELIGIBLE ENTITIES**

The Community Services Block Grant (CSBG) Reauthorization Act of 1998 requires that, as a condition of designation and to receive CSBG funding, private non-profit entities and public organizations administer the CSBG program through tripartite boards that “fully participate in the development, planning, implementation, and evaluation of the program to serve low-income communities.” In order for the State to promote the continued viability and effectiveness of eligible entities through appropriately constituted and well-functioning boards, this policy is issued to provide guidance on the composition, role, and responsibilities of the tripartite board.

Board Composition

The eligible entity’s board of directors should consist of a minimum of six (6) members and a maximum of three times the number of counties an entity has in its service area (with the exception of agencies with one county). Each county must be equally represented with members from each sector as described below.

Representatives of Low-Income Individuals and Families (Low-Income Sector)

The CSBG statute requires that a minimum of one-third of tripartite board membership be:

1. Comprised of representatives of low-income individuals and families who currently reside in the areas served. The implicit intent is to ensure those who are served by the eligible entity have a strong voice in agency governance and communicating the needs of the community.
2. “Chosen in accordance with democratic selection procedures.” Representatives of this sector may be nominated or elected either within a neighborhood or within the community as a whole; at a community meeting, a community organization meeting, or meeting of another low-income service provider; and the meeting was publicized using at least one of various kinds of media. No more than two members of Head Start Policy Councils may serve on the board.

Elected Public Officials or their Representatives (Public Sector)

The CSBG statute requires one-third of tripartite membership be elected officials. If a sufficient number of elected officials is not available, an appointed public official may be chosen. The elected official may choose a designee to act on his/her behalf. The designee would then be the board member and have full authority to exercise voting rights.

Entities are not restricted to choosing certain elected officials to serve on the board. These members should support the goal of the agency to address the poverty needs of the community and coordinate action by local governments. If an entity's bylaws state only certain elected officials can serve, the State strongly suggests a revision of the bylaws.

Public officials must be "holding office on the date of selection." Also, the public official or designee may serve on the board only while the public official is in office. The public official may change a designee at any time by submitting a letter to the board. Entities are responsible for ensuring this sector remains current such as prompt notification of newly elected officials or currently elected officials of the opportunity to serve on the board should the entity still choose. The entity must ensure timely replacement of board members who no longer hold office and ensure the last day of office for the public official is the last day of service on the board.

Representatives of Major Groups and Interests in the Community (Private Sector)

The remaining board members must be selected from "business, industry, labor, religious, law enforcement, education, or other major groups and interests in the community served." Members of this sector are included because they represent the balance of the community, and the entity cannot succeed without the support, resources, and participation of this group.

Eligible entities must ensure that no organization, business, or group has an indefinite seat on the board, meaning the selection of board members shall allow the opportunity for other interested organizations to serve on the board. Anyone chosen in this sector must be a member of the organization or an employee and live in that county.

Background Checks

Background checks must be conducted on all Board Members. If the background check identifies a past or present conviction for a felony or crime (either federal or state) the individual may not be seated on the board.

Duration of Service

The state requires a board member to serve no more than a maximum of three (3) four-year terms. **This requirement is not retroactive, meaning, board members whose terms expired prior to this policy revision cannot serve the additional term granted by this policy revision.**

The board member must be re-elected or re-appointed at least one month before the end of each

four-year term. The terms may be continuous or there may be a break in service. Eligible entities are encouraged to stagger the term expirations, whereas not to create an issue of too many board members leaving the board at the same time thus jeopardizing the governance of the board.

Should a board seat become vacant, it must be filled within a sixty (60) day period, unless a written request for waiver has been granted by DCS Director, within the sixty day period. Further, it is the responsibility of the board to notify DCS in writing within ten (10) days of any board changes, and an updated board roster submitted.

The entity shall provide DCS with a current board roster with supporting documentation of each member's election or appointment. This information must also be kept on file at the entity's main office for review during monitoring visits.

Entities may not seat a former employee as a board member for a period of two (2) years after leaving employment at the agency. Agencies may prohibit a former employee who has been terminated from serving on the board. Entities should prohibit federal/state employees from serving on the board if there is the potential for a conflict of interest between the federal/state office and the entity's business transactions, such as a potential funding source.

Entities may not employ a board member during the time of service on the board, nor for a period of two (2) years after leaving the board. This waiting period is to avoid the appearance of a board member having an undue employment advantage.

Training Requirements

New board members or members who had a one (1) year or more break in service shall participate in an orientation within two (2) months of being seated. The orientation shall include at a minimum: federal, state, local policies and procedures as it relates to the entity and its programs; board bylaws; articles of incorporation; entity mission; entity strategic plan; entity financial and programmatic reports; program overview to include sources of funding; audit report; board responsibilities and liability; conflict of interest; and ROMA.

Board members shall participate in training at least every two (2) years on board responsibilities and governance as specified in the CSBG Organizational Standards.

Training and/or orientation may be done at board meetings, special sessions, and may be done in person, electronic media, or other methods as determined by the board.

Should an entity fail to comply with training requirements, DCS will declare entity at-risk, and issue a request for a corrective action plan, which may result in a notice to terminate funding.

Board Member Responsibilities

The following list of responsibilities is necessary for the success of the entity, however, it is not all inclusive of what is expected of a board member:

Fully participate in the development, planning, implementation, and evaluation of the entity's programs.

Plan and participate in the entity's fund-raising events.

Develop entity mission statement and ensure activities and programs support it.

Develop entity strategic plan and receive periodic reports regarding the progress of it. Establish policy for the entity.

Supervise and evaluate one employee, the entity's executive director. Attend and participate in all scheduled board meetings.

Empower the entity by working with the community and being an ambassador for the entity and its programs.

Participate in scheduled trainings and entity events.

Board Committees

Entities are required to appoint at least five (5) standing committees: (1) Executive; (2) Planning and Evaluation; (3) Finance; (4) Personnel and; (5) Human Rights Committees. The entity may change the description of the activities of the standing committees as needed to conform to the diverse dynamics of the entity.

- The Executive Committee is responsible for the general conduct of the board's business on a day-to-day basis. The major functions of this committee are: to act upon matters in a timely manner; establish standing and subcommittees, and assign members to each; review the major administrative policies and recommend modifications to the full Board; secure adequate legal counsel for the entity; and to evaluate the entity's executive director.
- The Planning and Evaluation Committee is responsible for the development of the strategic plan and the evaluation of the entity's performance on meeting the goals in the strategic plan. The duties of this committee include: ensure the community strengths and needs assessment is completed; review and approve programs to be operated by the entity; develop internal reporting standards for programs; recommend funding of specific programs to the full board; evaluate each program or project on a timely basis; and coordinate efforts of the public and private sectors and other committees to meet the needs of the families served.
- The Finance Committee oversees the fiscal functions of the agency. This committee reviews budget proposals prepared by the entity staff; reviews financial reports on a monthly basis; ensures an adequate fiscal management system is in place; assists in securing additional sources of funding; and review and make recommendations to the full Board on all fiscal matters.

- The Personnel Committee is responsible for overseeing personnel functions and certain administrative functions of the entity. The duties of this committee include the review of personnel policies; promotions; salary ranges; hiring of employees recommended by the Executive Director; assist in the selection process when employing an Executive Director; and promote staff and career development programs for entity staff.
- The Human Rights Committee acts on matters regarding the rights of employees. Listening, hearing, fact-finding and providing objective judgements are the core functions of this committee. Other functions include ensuring protection of the entity and the rights of employees as established in the agency's Equal Opportunity Plan and recommending approval or denial of it to the Board; hearing equal opportunity complaints and recommending possible solutions to the Board; and ensuring due process prior to the termination of an employee.

Entities may appoint as many committees as needed to carry out the responsibilities of the board effectively. Committee membership should reflect the composition of the Board, i.e. a committee should be comprised of members from different sectors, counties, etc. Committees should divide the workload of the board, develop and promote the expertise of members, and permit decision-making between meetings. Entities should have a board development plan to ensure quality membership selection.

Voting by proxy is not permitted at board or committee meetings.

Removal of Board Members and Officers

Entities must develop removal provisions in its bylaws, consistent with state nonprofit corporation law, which specifies special notice and other procedural requirements for removal. The board may remove any director or officer for cause, including but not limited to: false certifications on the application, unexcused absences for a certain number of consecutive board meetings, failure to comply with the entity's conflict of interest policy, taking actions not in the best interest of the entity, incapacity, inappropriate conduct.

In instances of waste, fraud, or abuse, a board member **must** be removed immediately after it is discovered.

If any Board Member has been removed from the private or public sector or was not re-elected for the poor sector, they cannot serve in a different sector (i.e. no moving from one sector to another is allowed.)

By-Laws Requirements

Board by-laws shall list the total number of seats on the board per sector. They must include procedures for the selection of new board members in case of a vacancy for any reason. All vacancies shall be filled within 60 calendar days. The democratic selection procedure for the low-income sector must be described in detail.

Board by-laws must describe any performance standards (such as attendance, etc.). These standards must include a standard of conduct which specify expectations and conditions under which board members may be sanctioned or removed.

Board by-laws must describe quorum requirements, which shall be at least 50 percent plus one of the seats on the board.

Board by-laws must describe meeting requirements. Board meetings are subject to the State Open Meetings Act. The board shall meet monthly. Board meetings must be scheduled for the convenience of its members and the general public. Eligible entities shall provide notice in writing of any board meetings and agenda to all members at least 5 calendar days in advance. Electronic notices are acceptable, is members receiving the notices have agreed to accept this form of notification. Meeting notices and agendas shall be made available to the general public and MDHS/DCS at the time they are submitted to the board members.

By-laws must not conflict with any federal or MDHS policies or procedures.

Board Minutes

The board shall conduct meetings and keep written minutes in accordance with Robert's Rule of Order. Board minutes shall be made available to the public upon request. Minutes shall also be made available upon request in a translation of the appropriate language where a significant portion of the low-income population does not speak English.

Copies of the minutes of each meeting shall be submitted to MDHS/DCS no later than 10 calendar days after the date of the meeting in which the minutes were ratified. If the meeting did not have a quorum, the minutes shall be submitted within 3 calendar days of the meeting.

Board minutes must include a public notice of the meeting (newspaper notice, etc.), an agenda, sign-in sheets, and supporting documentation of newly seated board members. In case of any virtual or phone meetings, a virtual attendance document shall be sent to each individual who participated in the meeting and sent back signed and dated. Board minutes must be submitted on agency letterhead.