

Introduction

Agencies “shall perform Community Services Block Grant (CSBG) responsibilities in accordance with all applicable CSBG program and fiscal policies and procedures; as applicable through the Office of Management and Budget (OMB) circulars and Information Memorandums (IM); and all current procedures as required by the Tennessee Department of Human Services and Tennessee Department of Finance and Administration.”

Scope

This policy establishes guidelines for CSBG Eligible Entity responsibilities in regard to the Grant Contract and general grant administration.

Policy

A. Non-Discrimination Clause

Title IV of the Federal Civil Rights Act of 1964 [42 U.S.C. 2000d], Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), Section 202 of the Americans with Disabilities Act of 1992 (42 U.S.C. 12132), and all regulations related to these Acts address non-discrimination in service delivery to clients. All local offices must ensure that no one, based on race, color, sex, national origin, or handicap, is excluded from participation in, denied the benefits of, or subjected to discrimination under any service or activity for which the federal government provides funding.

B. Title VI and HIPAA Compliance

Title VI coordinator/responsible party will hold mandated annual Title VI and HIPAA training for agencies. Employee attendance shall be documented. Each employee shall also be provided with a copy of the agency's Title VI policy.

State CSBG requirements prohibit discrimination against any person on the grounds of handicap, disability, age, race, sex, color, national origin, religion, or any other classification protected by Federal or State constitutional and/or statutory law. No such person shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part with funds made available under CSBG 678(c). A provision in each CSBG contract stipulates this requirement. Monitoring of local agency compliance with all discrimination requirements is done routinely by the State.

C. Annual Employee Training

All CSBG Eligible Entity employees shall be trained annually on the below topics. This information shall be contained in an Employee Handbook/Agency Policy Manual. Annual training shall be documented for each employee.

- client confidentiality
- code of ethics and conduct
- electronic communications
- customer relations
- release of information

D. Conflict of Interest

Contract agencies shall have a conflict-of-interest statement signed by all employees involved with CSBG.

E. Documentation and Record-Keeping Processes

In accordance with the requirements set forth in 28 C.F.R. Part 66 and Part 70, all financial records, supporting documents, statistical records, and all other records pertinent to the award shall be retained by each sub-recipient organization for at least five years following the closure of their most recent audit report. Retention is required for purposes of Federal and State examination and audit. Records may be retained in an automated format. State or local governments may impose record retention and maintenance requirements in addition to those prescribed. Reference 2 C.F.R. 200.333.

The five (5) year retention period starts from the date of the submission of the closure of the single audit report which covers the grant period. If any litigation, claim, negotiation, audit, or other action involving the records has been started before the expiration of the five-year retention period the records must be retained until completion of the action and resolution of all issues which arise from it or until the end of the five-year retention period, whichever is later.

Supporting Documents

None

Definitions/Acronyms

Term	Definition
CSBG	Community Services Block Grant

Supersedes

Community Services Block Grant (CSBG) Policy & Procedure Manual, effective date 10/1/23

Section 5: Grant Administration and Monitoring

- Contract Responsibilities, Non-discrimination Clause, Title VI and HIPAA Compliance, Confidentiality of Client Information, Documentation and Record-Keeping Processes pgs. 37-38

Approval History

Approved By	Approver Title	Approved Date	Effective Date
Clarence H. Carter	Commissioner	06/16/2025	10/01/2025

Revision History

Date	Version	Location of Change	Description/Reason for Change
06/16/2025	10/01/2025	New document	This policy was developed to create a standalone policy from the CSBG Policy and Procedure Manual. Changed Confidentiality of Client Information to Annual Employee Training. Edited language for clarity.

Approved By	<i>Clarence H. Carter</i>	Approval Date	06/16/2025
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