

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

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## Section 1

### CSBG Administrative Information

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

1.1a. Provide the federal fiscal years this plan covers: Year One 22 Year Two 23

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

Has information in regards to the state lead agency changed since the last submission of the state plan? ☒ Yes ☐ No

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

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

1.2a. Lead agency **[Narrative, 150 Characters]**

**Tennessee Department of Human Services (TDHS)**

**GUIDANCE:** This should only include the exact name of the lead agency and an acronym (as applicable).

**EXAMPLE:** Office of Community Services (OCS)

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

- ☐ Community Affairs Department
- ☐ Community Services Department
- ☐ Governor’s Office
- ☐ Health Department
- ☐ Housing Department
- ☐ **Human Services Department**
- ☐ Social Services Department
- ☐ Other, describe: **[Narrative, 100 characters]**

1.2c. **Cabinet or Administrative Department Name:** Provide the name of the cabinet or administrative department of the CSBG authorized official **[Narrative, 100 Characters]** **Tennessee 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. **[Narrative, 50 Characters each]**

Name Clarence H.Carter Title Commissioner

- 1.2e.** Street Address **[Narrative, 200 characters]** 505 Deaderick Street

- 1.2f.** City **[Narrative, 50 characters]** Nashville

- 1.2g.** State **[Dropdown]** TN

- 1.2h.** Zip Code **[Numerical Response, 5 digits]** 37243

- 1.2i.** Work Telephone Number and Extension (if applicable) **[Numerical Response, 10 – 15 digits to include extensions]** (615) 313-4702

- 1.2j.** Fax Number **[Numerical Response, 10 digits]** (615) 741-4165

- 1.2k.** Email Address **[Narrative, 150 characters]** -Clarence.H.Carter@tn.gov

- 1.2l.** Lead Agency Website **[Narrative, 200 characters]**  
<https://www.tn.gov/humanservices.html>

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

- 1.3. Designation Letter:** Attach the state's official CSBG designation letter. A new designation letter is required if the chief executive officer of the state and/or designated agency has changed. **[Attach a document.]**

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

☐ Agency Name

☐ **Point of Contact**

☐ Street Address

☐ City

☐ State

☐ Zip Code

☐ Office Number

☐ Fax Number

☐ **Email Address**

☐ Website

- 1.4a. Agency Name [Narrative, 150 characters] [Tennessee Department of Human Services](#)
- 1.4b. Point of Contact Name [Narrative, 50 characters each]  
Name Avé Trotter Title CSBG Program Director
- 1.4c. Street Address [Narrative, 200 characters] [505 Deaderick Street](#)
- 1.4d. City [Narrative, 50 characters] [Nashville](#)
- 1.4e. State [Dropdown] [TN](#)
- 1.4f. Zip Code [Numerical Response, 5 digits] [37243](#)
- 1.4g. Office Telephone Number [Numerical Response, 10 – 15 digits to include extensions] [615-741-7419](#)
- 1.4h. Fax Number [Numerical Response, 10 digits] [\(615\)313-6683](#)
- 1.4i. Email Address [Narrative, 150 characters] [ave.o.trotter@tn.gov](mailto:ave.o.trotter@tn.gov)
- 1.4j. Agency Website [Narrative, 200 characters]  
<https://www.tn.gov/humanservices.html>
- 1.5. Provide the following information in relation to the State Community Action Association.

**GUIDANCE:** Under this question, please respond yes and provide the information if there is an **entity** or organization that serves in the capacity of a state community action association that is located within your state, whether voluntarily or contractually. If the entity that serves as the state community action association is located outside of the state, or if there is only a single eligible entity within the state that also performs the functions of a Community Action Association, please answer no to this question.

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

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

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

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

1.5a. Agency name [Narrative, 150 characters]

[Tennessee Association of Community Action \(TACA\)](#)

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

Name [Kreda Yokley](#)

Title [Executive Director](#)

- 1.5c.** Street Address [Narrative, 200 characters] [800 2<sup>nd</sup> Avenue North](#)
- 1.5d.** City [Narrative, 50 characters] [Nashville](#)
- 1.5e.** State [Dropdown] [TN](#)
- 1.5f.** Zip Code [Numerical Response, 5 digits] [37201](#)
- 1.5g.** Telephone Number [Numerical Response, 10 – 15 digits to include extensions]  
[\(615\)714-3299](#)
- 1.5h.** Fax Number [Numerical Response, 10 digits] [\(423\)246-5682](#)
- 1.5i.** Email Address [Narrative, 150 characters] [kreda4taca@gmail.com](mailto:kreda4taca@gmail.com)
- 1.5j.** State Association Website [Narrative, 200 characters]  
<http://www.tncommunityaction.org/>
- 1.5k.** State Association currently serves as the Regional Performance Innovation  
Consortia (RPIC) lead ☐ Yes ☒ No

## Section 2

### State Legislation and Regulation

- 2.1. **CSBG State Legislation:** State has a statute authorizing CSBG. ☒ Yes ☐ No
- 2.2. **CSBG State Regulation:** State has regulations for CSBG. ☐ Yes ☒ No
- 2.3. **Legislation/Regulation Document:** Attach the legislation and/or regulations or provide a hyperlink(s) to the documents indicated under Items 2.1. and/or Item 2.2. **[Attach a document and/or provide a link, 1500 characters]**

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

## Section 3

### State Plan Development and Statewide Goals

- 3.1. CSBG Lead Agency Mission and Responsibilities:** Briefly describe the mission and responsibilities of the state agency that serves as the CSBG lead agency. **[Narrative, 2500 characters]**

TDHS's Mission is to build strong families by connecting Tennesseans to employment, education and support services. TDHS's Vision is to revolutionize the customer experience through innovation and a seamless network of services.

The Tennessee Department of Human Services (TDHS) is responsible for administering Temporary Assistance for Needy Families (Families First), Supplemental Nutrition Assistance Program, Child Care Development Fund and Child Care Services, Vocational Rehabilitation (Tennessee Business Enterprise and the Tennessee Rehabilitations Centers), Blind and Visually Impaired Services, Deaf, Sensory Services, Disability Determination Services, Independent Living Services, the Tennessee Technology Access Program (Assistive Technology Services), Adult Day Services, Adult Protective Services, Social Services Block Grant (Adult Services), and Child Support.

TDHS partners with a network of twenty (20) local Community Action Agencies (CAAs) that provides programs and services throughout each of the 95 counties with the support of the Community Services Block Grant (CSBG).

- 3.2. State Plan Goals:** Describe the state's CSBG-specific goals for state administration of CSBG under this State Plan. **[Narrative, 3000 characters]**

<b>GUIDANCE:</b> States should take into account feedback from OCS, their eligible entities, and the ACSI survey completed by eligible entities when creating their state plan goals.
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**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.

TDHS's CSBG Unit's purpose statement is that "Everybody should have equal opportunity to achieve their highest potential in partnership with their families and communities."

CSBG has established four primary goals – Strength, Transformation, Accountability, and Resources or STAR – that are explained below to work toward this mission.

#### S – Strength

- The CSBG unit will collaborate with agencies to strengthen agencies' board

governance and fiscal practices through the use of the CSBG Performance Management System to decrease audit findings and increase agencies' ability to support customers.

#### T – Transformation

- The CSBG unit will collaborate with agencies to develop, implement, and sustain methods for using CSBG funds to help customers meet their goals through new and innovative intake and service delivery practices that account for not only the person's needs, but also goals.

#### A – Accountability

- The CSBG unit will collect and analyze agency data to engage agencies in the process of continuous quality improvement by targeting and improving deficiencies through measurable change.

#### R –Resources

- The CSBG unit will link agencies to training, technical assistance, key stakeholders/partners, and other resources, including new resources within the department and the state to expand the service array for customers.

TDHS will partner with the Tennessee Association of Community Action (TACA) by allocating a portion of the state's administrative funds to TACA to provide training and technical assistance, and support the development of a strategic plan to provide a catalyst for long-term investment into the state's community action network.

A key component to strengthening agencies' capacity will be through training and technical assistance, not only of staff, but the board, and the community as agencies increase their capacity to build upon initiatives through the two-generation whole family approach incorporating the Human Capacity Community Transformation (HCCT). TDHS will facilitate multiple learning opportunities through the development of Training and Technical Assistance Action plan and implementation of a statewide learning community, which will continue to evolve to meet the needs of agencies and the customers they support through a customer-centered approach and a process of continuous quality improvement Through engagement with the learning community, TDHS will focus on the following areas for process improvements:

- Training/Technical Assistance
- Communication
- Performance Management
- Organizational Standards Assessment
- Fund Utilization



Additionally, TDHS will participate in a number of committees, work groups, and councils that will encourage information sharing and enhance process improvements for the State Office, State Association, and eligible CSBG entities.

Over the next two and a half years, through September 2023, TDHS will participate in the convening of the CSBG State Management Work Group (SMWG), a new group that will serve as a consultative body to NASCSP and OCS in conducting research that informs the development of a variety of tools, resources, and training and technical assistance for state administrators.

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

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

- ☐ State Performance Indicators and/or National Performance Indicators (NPIs)
- ☐ U.S. Census data
- ☐ State performance management data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)
- ☐ Monitoring Visits/Assessments
- ☐ Tools not identified above (specify) **[Narrative, 500 characters]** CSBG Monthly/Quarterly Reports, Fiscal Invoicing, Single Audit Reports, RPIC and T/TA Plans

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

- ☐ Eligible entity community needs assessments
- ☐ Eligible entity community action plans
- ☐ Public Hearings/Workshops
- ☐ Tools not identified above (e.g., state required reports) [specify] **[Narrative, 500 characters]**

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

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

- ☐ Organizations not identified above (specify) **[Narrative, 500 characters]**  
Tennessee Housing Development Agency (THDA)

### 3.4. Eligible Entity Involvement

- 3.4a.** Describe the specific steps the state took in developing the State Plan to involve the eligible entities. **[Narrative, 3000 Characters]**

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

During the February 2021 Quarterly TACA Meeting, TDHS announced to all eligible entities the process for stakeholder engagement in development of the new State Plan for regular CSBG funds.

In February and March, TDHS sent email reminders about agency participation in 2021 ACSI Survey to help in the development of state plans and contribute in the effort to improve performance across the CSBG Network.

On March 19, 2021, TDHS engaged the CSBG Task Force in a virtual meeting to present the background of the ACSI Survey and importance of agency participation, elements of the State Plan, State Plan focus areas, list of identified relationships and collaborations, and schedule of plans leading up to the submission of FY22-23 Model State Plan. After the meeting, an email was sent to the CSBG Task Force that included presentation slides, a copy of the FY20-21 Model State Plan and a focus group survey of to gather further recommendations and feedback for the initial Model State Plan draft.

During the April 2021 Quarterly TACA Meeting, TDHS shared information and updates to the Model State Plan process to all eligible entities, which included highlights from the March CSBG Task Force meeting and Save the Date announcement for the public hearing.

On June 30, 2021, TDHS plans to send an official Public Hearing Notice and advisory to CSBG providers, partners and to post a working draft of the CSBG Model State Plan to the TDHS website and to issue a press release. TDHS will email a copy of the proposed FY22-23 Model State Plan on July 6, 2021, for eligible entities to review and provide feedback. In addition, eligible entities were provided notice of the public hearing scheduled for July 27, 2021. The

public comment period will close on July 30, 2021.

- 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. **[Narrative, 3000 Characters]**

TDHS began engaging with the CSBG Task Force, which is an interagency council that meets at least twice a year to collaborate with TDHS and other agencies to leverage opportunities, resources, address policies and procedures that may inhibit service delivery and customer outcomes; and work collectively to develop a universal application and a reporting system that supports continuous quality improvement. The CSBG Task Force was utilized as a focus group early in the process by facilitating a meeting to discuss past ASCI results and discussion of TDHS identified focus areas and list of collaborators before drafting the Model State Plan. The CSBG Task Force was surveyed for additional feedback and recommendations for partnering together with TACA and TDHS to develop a plan that meets the needs of the entire network.

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

- 3.5. Eligible Entity Overall Satisfaction:** Provide the state's target for eligible entity Overall Satisfaction during the performance period. Year One 72 Year Two 75 **[Numerical, 3 digits]**

**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. **[Narrative, 2500 Characters]**

**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.

On June 30, 2021, TDHS plans to send an official Public Hearing Notice and advisory to CSBG providers, partners and to post a working draft of CSBG Model State Plan to the TDHS website and to issue a press release. TDHS will email a copy of the proposed FY22-23 Model State Plan on June 28, 2021 and provide a reminder email on July 6, 2021, for eligible entities to review and provide feedback. In addition, eligible entities were provided notice of the public hearing held on July 27, 2021. The public comment period will close on July 30, 2021.

- 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. **[Narrative, 2500 Characters]**

The FY2022 Public Hearing will be held virtually on July 27, 2021 to accommodate social distancing and safe practices during the pandemic. The public hearing will take place 21 days after the plan is posted on the website, a news release was issued, and the agencies were notified of the proposed plan. TDHS will accept public comment until July 30, 2021 to meet the 30-day window for public comment.

- 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.
[Select a date]	[Narrative, Facility and City, 100 characters]	<input type="radio"/> Public <input type="radio"/> Legislative <input type="radio"/> Combined	<input type="checkbox"/>
4/2/19	The House Ways and Means Committee	Legislative	

<b>Date</b>	<b>Location</b>	<b>Type of Hearing [Select an option]</b>	If a Combined Hearing was held confirm that the public was invited.
7/27/2021	Virtual – WebEx	Public	
<b>ADD a ROW function</b> 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.  
**[Attach supporting documentation or provide a hyperlink(s), 500 characters]**

<https://publications.tnsosfiles.com/acts/111/pub/pc0405.pdf>

**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:** An agenda would be named: 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) [Provide all counties]	Public or Nonprofit	Type of Entity (choose all that apply)
[READ-ONLY]	[READ-ONLY]	[READ-ONLY]	<ul style="list-style-type: none"> <li>• Community Action Agency</li> <li>• Limited Purpose Agency</li> <li>• Migrant or Seasonal Farmworker Organization</li> <li>• Tribe or Tribal Organization</li> </ul>
THE ADD-A-ROW FUNCTION WILL NOT BE AVAILABLE ON THIS TABLE. ANY ADDITIONS/DELETIONS TO THE ELIGIBLE ENTITY LIST SHOULD BE MADE WITHIN THE MASTER LIST.			

**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 “no less than 90 percent” of their CSBG allocation, under Section 675B, to the eligible entities.

CSBG Eligible Entity	Geographical Area Served by county (Provide all counties)	Public or Nonprofit	3.Type of Entity (choose all that apply)
<b>Auto-populated</b> [Narrative, 2500 characters]	<b>Auto-populated</b> [Narrative, 2500 characters]	<b>Auto-populated</b> [Select Public or Nonprofit]	<b>Auto-populated</b> <ul style="list-style-type: none"> <li>• Community Action Agency</li> <li>• Limited Purpose Agency</li> <li>• Local Government Agency</li> <li>• Migrant or Seasonal Farmworker Organization</li> <li>• Tribe or Tribal Organization</li> <li>• Other (describe in column 5)</li> </ul>
Anderson County			Community Action Agency (CAA)

<b>CSBG Eligible Entity</b>	<b>Geographical Area Served by county (Provide all counties)</b>	<b>Public or Nonprofit</b>	<b>3.Type of Entity (choose all that apply)</b>
Community Action Commission	Anderson County	Nonprofit	
Blount County Community Action Agency	Blount County	Nonprofit	Community Action Agency (CAA)
Bradley-Cleveland Community Services Agency	Bradley County	Nonprofit	Local Government Agency
Chattanooga Youth and Family Development Agency	Hamilton County	Public	Local Government Agency
Clarksville-Montgomery County Community Action Agency	Montgomery County	Nonprofit	Community Action Agency (CAA)
Delta Human Resource Agency	Fayette, Lauderdale, and Tipton Counties	Public	Local Government Agency
Douglas Cherokee Economic Authority, Inc.	Cocke, Grainger, Hamblen, Jefferson, Monroe, and Sevier Counties	Nonprofit	Community Action Agency (CAA)
Highland Rim Economic Corporation	Dickson, Houston, Humphreys, and Stewart Counties	Nonprofit	Community Action Agency (CAA)
Knoxville-Knox County Community Action Commission	Knox County	Public	Local Government Agency
Metropolitan Action Commission	Davidson County	Public	Local Government Agency
Mid-Cumberland Community Action Agency	Cheatham, Robertson, Rutherford, Sumner, Trousdale,	Nonprofit	Community Action Agency (CAA)



<b>CSBG Eligible Entity</b>	<b>Geographical Area Served by county (Provide all counties)</b>	<b>Public or Nonprofit</b>	<b>3.Type of Entity (choose all that apply)</b>
	Williamson, and Wilson Counties		
Mid-East Community Action Agency	Louden, and Roane Counties	Nonprofit	Community Action Agency (CAA)
Mountain Valley Economic Opportunity Agency	Campbell, Clairborne, Morgan, Scott, and Union Counties	Nonprofit	Community Action Agency (CAA)
Northwest Tennessee Economic Development Council	Benton, Carroll, Crockett, Dyer, Gibson, Henry, Lake, Obion, and Weakley Counties	Nonprofit	Community Action Agency (CAA)
Shelby County Community Services Agency	Shelby County	Public	Local Government Agency
South Central Human Resources Agency	Bedford, Coffee, Franklin, Giles, Hickman, Lawrence, Lewis, Lincoln, Marshall, Maury, Moore, Perry, and Wayne Counties	Public	Local Government Agency
Southeast Tennessee Human Resource Agency	Bledsoe, Grundy, Marion, McMinn, Meigs, Polk,	Public	Local Government Agency

CSBG Eligible Entity	Geographical Area Served by county (Provide all counties)	Public or Nonprofit	3.Type of Entity (choose all that apply)
	Rhea, and Sequatchie Counties		
Southwest Human Resource Agency	Chester, Decatur, Hardeman, Hardin, Haywood, Henderson, Madison, and McNairy Counties	Public	Local Government Agency
Upper Cumberland Human Resource Agency	Cannon, Clay, Cumberland, DeKalb, Fentress, Jackson, Macon, Overton, Pickett, Putnam, Smith, VanBuren, Warren, and White Counties	Public	Local Government Agency
Upper East Tennessee Human Development Agency	Carter, Greene, Hancock, Hawkins, Johnson, Sullivan, Unicoi, and Washington Counties	Nonprofit	Community Action Agency (CAA)

**5.2.** Total number of CSBG eligible entities: 20 [This will automatically update based on Table 5.1.]

**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) or that voluntarily relinquished its status as a CSBG eligible entity.

CSBG Eligible Entity	Type	Start Date	Geographical Area Served
[Narrative, 150 characters]	[Dropdown: <ul style="list-style-type: none"><li>• Designation</li><li>• Permanent Re-Designation</li><li>• Interim Re-Designation]</li></ul>	[Date Picker]	[Narrative, 550 characters]
<b>ADD-A-ROW FUNCTION.</b> Note: States will be able to add a row as needed.			

**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 consistent 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
[Narrative, 150 characters]	[Dropdown: <ul style="list-style-type: none"> <li>Termination/De-designation</li> <li>Voluntary Relinquished]</li> </ul>
<b>ADD-A-ROW FUNCTION.</b> Note: States will be able to add a row as needed.	

- 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.
[Narrative, 500 characters]  <i>List and number all entities involved.</i>	[Narrative, 150 characters]	[Narrative, 150 characters]	[Narrative, 150 characters]
<b>ADD-A-ROW FUNCTION.</b> Note: States will be able to add a row as needed.			

**GUIDANCE:** This question refers to the merger of two or more existing CSBG eligible entities only. If an organization that was not previously a CSBG eligible entity merges is the surviving organization in a merger with a CSBG eligible entity, the new entity should be listed under 5.3a. as a new designation, while the previously funded CSBG eligible entity should be included under 5.3b.

## 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.

**[Narrative, 2500 characters]**

- 6.1b. Alternative Organizational Standards:** If using an alternative set of organizational standards, attach the complete list of alternative organizational standards. **[Attachment (as applicable)]**

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

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

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

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

- 6.2. Implementation:** Check the box that best describes how the state officially adopted organizational standards for eligible entities in the state in a manner consistent with the state's administrative procedures act. If "Other" is selected, provide a timeline and additional information, as necessary. **[Check all that applies and narrative (as applicable)]**

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

**6.3. Organizational Standards Assessment:** Describe how the state will assess eligible entities against organizational standards this federal fiscal year(s). **[Check all that apply]**

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

**6.3a. Assessment Process:** Describe the planned assessment process. **[Narrative, 5000 characters]**

**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.

TDHS provides monitoring through the Office of Inspector General (OIG). Each agency completes the Self-Assessment Tool to gauge their ability to fulfill the COE Organizational Standards as outlined in CSBG Internal Memorandum 138. TDHS validates agency responses annually through a combination of desk reviews and onsite or virtual visits. Agencies not assessed through an onsite or virtual visit are assessed utilizing the COE Organizational Standards State Assessment Tool.

TDHS works with agencies to ensure all documentation is provided through the assessment process. In the event an agency is determined to be out of compliance, TDHS requires the agency to establish a corrective action plan. If the agency requires additional assistance, TDHS offers training and technical assistance through a Training Assistance Plan (TAP) or Quality Improvement Plan (QIP) and partners with TACA to provide this training and technical assistance. TDHS continues to monitor agencies' compliance until any findings have been alleviated.

**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:** The following question will only need to be answered based on your response to 6.4.

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

CSBG Eligible Entity	Exemption Provided	Description/Justification
[Narrative, 150 characters]	[Select Yes or No]	[If Yes is selected, provide a narrative, 2500 characters]
<b>ADD a ROW function</b> Note: Rows will be able to be added for each additional exception.		

**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. **[Insert a percentage]**                      **Year One** 85    **Year Two** 90

**Note:** Item 6.5. is associated with State Accountability Measures 6Sa and pre-populate 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 state association in identifying targets.

## SECTION 7

### State Use of Funds

#### Eligible Entity Allocation (95 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. **[Narrative, 5000 characters]**

Funding is allocated to the CSBG agencies based on a rolling three-year average of poverty data from the Census Bureau and is updated annually.

<https://www.census.gov/did/www/saipe/>

**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 95 % Year Two 95 %

Planned CSBG 90 Percent Funds – Year One	
CSBG Eligible Entity	Funding Amount \$
Pre-populates from the CSBG Eligible Entity Master List	Enter the dollar amount for each eligible entity for the first FFY covered by this plan
Anderson County CAC	\$168,100.00
Blount County CAA	\$198,700.00
Bradley-Cleveland CSA	\$226,600.00
Chattanooga YFD	\$642,800.00
Clarksville-Montgomery County CAA	\$351,000.00
Delta HRA	\$249,100.00
Douglas Cherokee Economic Authority, Inc.	\$706,700.00
Highland Rim EC	\$168,500.00
Knoxville-Knox County CAC	\$870,200.00
Metropolitan Action Commission	\$1,345,200.00
Mid-Cumberland CAA	\$1,166,300.00
Mid-East CAA	\$188,900.00



Planned CSBG 90 Percent Funds – Year One	
CSBG Eligible Entity	Funding Amount \$
Mt. Valley EOA	\$387,800.00
Northwest TN EDC	\$618,400.00
Shelby County CSA	\$2,505,100.00
South Central HRA	\$877,600.00
Southeast TN HRA	\$453,900.00
Southwest HRA	\$609,600.00
Upper Cumberland HRA	\$831,800.00
Upper East TN HAD	\$1,186,400.00
<b>Total</b>	<b>\$13,752,700.00 (Auto-calculated)</b>

Planned CSBG 90 Percent Funds – Year Two	
CSBG Eligible Entity	Funding Amount \$
Pre-populates from the CSBG Eligible Entity Master List	Enter the dollar amount for each eligible entity for the second FFY covered by this plan
Anderson County CAC	\$168,100.00
Blount County CAA	\$198,700.00
Bradley-Cleveland CSA	\$226,600.00
Chattanooga YFD	\$642,800.00
Clarksville-Montgomery County CAA	\$351,000.00
Delta HRA	\$249,100.00
Douglas Cherokee Economic Authority, Inc.	\$706,700.00
Highland Rim EC	\$168,500.00
Knoxville-Knox County CAC	\$870,200.00
Metropolitan Action Commission	\$1,345,200.00
Mid-Cumberland CAA	\$1,166,300.00
Mid-East CAA	\$188,900.00
Mt. Valley EOA	\$387,800.00
Northwest TN EDC	\$618,400.00
Shelby County CSA	\$2,505,100.00
South Central HRA	\$877,600.00
Southeast TN HRA	\$453,900.00
Southwest HRA	\$609,600.00
Upper Cumberland HRA	\$831,800.00
Upper East TN HAD	\$1,186,400.00
<b>Total</b>	<b>\$13,752,700.00 (Auto-calculated)</b>

**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). **[Narrative, 5000 characters]**

TDHS actually exceeds the 90% pass through requirement by allocating 95% of available CSBG funds, through the state's contracting process.

When submitting a contract or contract amendment for processing, all internal department program approvals need to be completed and the routing packet submitted to TDHS budget at least 90 days prior to the effective date of the contract or amendment. State CSBG Program staff collaborate annually with the TDHS budget and procurement divisions to establish budgets based upon the previous federal allocation. Once the Scope of Services has been updated, or amendment(s) have been established, the contract documents are routed for approval internally and through the state's Central Procurement Office (CPO). Once the Delegated Grant Authority and Grant Contract have been approved by CPO, the contracts will be routed to the agencies, to be signed and executed before the start of the federal fiscal year (FFY), or established effective date of the amendment.

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

**7.4a. Distribution Consistency:** If no, describe state procedures to ensure funds are made available to eligible entities consistently and without interruption.  
**[Narrative, 5000 Characters]**

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

- 7.5. Performance Management Adjustment:** Describe the state's strategy for improving grant and/or contract administration procedures under this State Plan as compared to past plans. Any improvements should be based on analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any improvements, provide further detail.  
**[Narrative, 5000 Characters]**

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

TDHS has realigned the federal allocations from the State Fiscal Year (SFY) to the Federal Fiscal Year (FFY) in 2020, to better facilitate the timely issuance of funds upon availability and to allow the availability of funds to continue through the end of the grant period. Beginning October 1, 2020, funds were aligned through establishing two-year contracts with agencies.

To support this change in performance and grant management, TDHS implemented a new invoicing system to account for concurrent contracts and to manage remaining carryover funds for 13-24 months of a grant contract.

TDHS implemented fund utilization and grant management and training/technical assistance virtual calls with each agency in 2021 and will maintain this level of engagement with CSBG eligible entities over the next two years as a form of performance management.

Moving forward, TDHS will continue to evaluate agencies' historical use of CSBG funds and budgets for services, and past performance, to determine the most effective way to allocate and distribute funds among agencies. TDHS will participate in the DHS Workforce Council, which is dedicated to improving individual, family, and community outcomes, to address the systematic barriers to the causes and conditions of poverty. In particular, the Council will work to provide exceptional customer service along with connecting Tennesseans to meaningful employment opportunities. The Tennessee Department of Human Services (TDHS) is creating an agency-wide workforce development strategy, to minimize the duplication of services through a strategic approach with other partners and state agencies, and to provide recommendations for ensuring that all customers – regardless of the TDHS division to which they are connected – can access meaningful career pathways that also meet industry demands of the Tennessee economy and align to Governor's Office priorities.

TDHS is continuing to seek other opportunities for dialogue with and feedback from eligible entities, OCS, and other sources that will inform future improvements to grant and contract administration procedures.

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

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

Year One 5 %      Year Two 5 %      [Numeric response, specify %]

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

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

Year One 21      Year Two 21      [Numeric response, 0.00 – 99.99]

- 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 4      [Numeric response, 0.00 – 99.99]

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

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

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

to 100%.

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

**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 main category with which the activity is associated.

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

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	Enter either a planned \$ for each item listed for the first FFY that this plan covers.	These planned services/activities will be described in State Plan Item 8.1 <b>[Read Only]</b>
7.9b. Coordination of State-operated programs and/or local programs		These planned services/activities will be described in State Plan Section 9, State Linkages and Communication <b>[Read Only]</b>
7.9c. Statewide coordination and communication among eligible entities		These planned services/activities will be described in State Plan Section 9, State Linkages and Communication <b>[Read Only]</b>
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need		<b>[Narrative, 5000 characters]</b>
7.9e. Asset-building programs		<b>[Narrative, 5000 characters]</b>
7.9f. Innovation programs/activities by eligible entities or other neighborhood group		Describe here. <b>[Narrative, 5000 characters]</b>
7.9g. State charity tax credits		<b>[Narrative, 5000 characters]</b>
7.9h. Other activities [Specify under Column 4]		Specify the other activities funded through discretionary funds here. <b>[Narrative, 5000 characters]</b>
<b>Totals</b>	<b>Auto-calculated</b>	

<b>Use of Remainder/Discretionary Funds – Year Two (as applicable)</b>		
<b>Remainder/Discretionary Fund Uses</b> (See 675C(b)(1) of the CSBG Act)	<b>Planned \$</b>	<b>Brief Description of Services and/or Activities</b>
7.9a. Training/technical assistance to eligible entities	<b>Enter either a planned \$ or % for each item listed for the first FFY that this plan covers.</b>	These planned services/activities will be described in State Plan Item 8.1 <b>[Read Only]</b>
7.9b. Coordination of State-operated programs and/or local programs		These planned services/activities will be described in State Plan section 9, State Linkages and Communication <b>[Read Only]</b>
7.9c. Statewide coordination and communication among eligible entities		These planned services/activities will be described in State Plan section 9, State Linkages and Communication <b>[Read Only]</b>
7.9d. Analysis of distribution of CSBG funds to determine if targeting greatest need		<b>[Narrative, 5000 characters]</b>
7.9e. Asset-building programs		<b>[Narrative, 5000 characters]</b>
7.9f. Innovation programs/activities by eligible entities or other neighborhood group		Describe here. <b>[Narrative, 5000 characters]</b>
7.9g. State charity tax credits		<b>[Narrative, 5000 characters]</b>
7.9h. Other activities [Specify under Column 4]		Specify the other activities funded through discretionary funds here. <b>[Narrative, 2500 characters]</b>
<b>Totals</b>	<b>Auto-calculated</b>	

**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 of the activities in Table 7.9. **[Check all that apply and narrative where applicable]**

- ☐ The state directly carries out all activities (No Partnerships)
- ☐ The state does not have remainder/discretionary funds
- ☐ The state partially carries out some activities
- ☐ CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds) **[Numeric response, 0 – 100]**
- ☐ Other community-based organizations
- ☐ State Community Action association
- ☐ Regional CSBG technical assistance provider(s)
- ☐ National technical assistance provider(s)
- ☐ Individual consultant(s)
- ☐ Tribes and Tribal Organizations
- ☐ Other **[Narrative, 2500 characters]** **Pass-through 95% of funds**

**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.

**[Narrative, 5000 Characters]**

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

N/A

## SECTION 8

### State Training and Technical Assistance

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

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

**GUIDANCE:** Table 8.1. should only include the trainings that are being paid for using state discretionary training and technical assistance funds as noted under 7.9a.



Training and Technical Assistance – Year One			
Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
All quarters	Both	Other	<ul style="list-style-type: none"> <li>An array of capacity building activities such as: Human Capacity Community Transformation through the two-generation approach, re-entry programs, etc. through the Human Services Value Curve ©, Transition to Success™, family-centered coaching, motivational interviewing, and trauma informed approaches.</li> </ul>
All quarters	Both	Reporting	<ul style="list-style-type: none"> <li>Annual Report Training – follow up NASCSP Data Project</li> <li>Webinars</li> <li>Provide T/TA as Needed</li> </ul>
All quarters	Both	ROMA	<ul style="list-style-type: none"> <li>TACA Quarterly Meetings (Outcome Advisors)</li> <li>TACA Annual Conference</li> <li>Provide T/TA as Needed</li> </ul>
Ongoing/Multiple Quarters	Training	Community Assessment	<ul style="list-style-type: none"> <li>Training to address the causes and conditions of poverty; gaps, etc.</li> </ul>
Ongoing/Multiple Quarters	Both	Strategic Planning	<ul style="list-style-type: none"> <li>Provide T/TA for specific entities w/outstanding strategic plans</li> <li>Provide T/TA as</li> </ul>





Training and Technical Assistance – Year Two			
Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
per row]	dropdown per row]	[Select one dropdown per row]	characters]
All quarters	Both	Fiscal	<ul style="list-style-type: none"> <li>• Webinar Re: Invoicing Template and reimbursement process T/TA-Quarterly TACA Meetings</li> <li>• Annual TACA Conference</li> <li>• Ongoing T/TA</li> </ul>
All quarters	Both	Governance/Tripartite Boards	<ul style="list-style-type: none"> <li>• Visit Boards (avg. 10/year)</li> <li>• Provide Orientation/Resource Materials</li> <li>• TACA Annual Conference</li> <li>• Provide Training as Needed</li> </ul>
F2 Q3	Both	Governance/Tripartite Boards	<ul style="list-style-type: none"> <li>• Board Retreat</li> </ul>
All quarters	Both	Organizational Standards – General	<ul style="list-style-type: none"> <li>• TACA Annual Conference</li> <li>• Provide Training as Needed</li> </ul>
All quarters	Both	Correcting Significant Deficiencies Among Eligible Entities	<ul style="list-style-type: none"> <li>• Provide T/TA as Needed</li> </ul>
All quarters	Both	Reporting	<ul style="list-style-type: none"> <li>• <a href="#">TDHS ACCENT (Automated Client Certification and Eligibility Network for Tennessee) Training</a></li> <li>• Webinars</li> <li>• Provide T/TA as Needed</li> </ul>
All quarters	Both	ROMA	<ul style="list-style-type: none"> <li>• TACA Quarterly Meetings (Outcome Advisors)</li> <li>• TACA Annual</li> </ul>

Training and Technical Assistance – Year Two			
Planned Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
			Conference <ul style="list-style-type: none"> <li>• Provide T/TA as Needed</li> </ul>
Ongoing/Multiple Quarters		Community Assessment	<ul style="list-style-type: none"> <li>• Training to address the causes and conditions of poverty; gaps, etc.</li> </ul>
Ongoing/Multiple Quarters	Both	Strategic Planning	<ul style="list-style-type: none"> <li>• Provide T/TA for specific entities w/outstanding strategic plans</li> <li>• Provide T/TA as needed</li> </ul>
FY 2 Q1	Both	Monitoring	<ul style="list-style-type: none"> <li>• Provide annual training re: monitoring process/updates</li> <li>• Provide T/TA as needed</li> </ul>
Ongoing/Multiple Quarters	Both	Communication	<ul style="list-style-type: none"> <li>• T/TA will be provided through periodic newsletter or weekly email communication</li> </ul>
Ongoing/Multiple Quarters	Both	Technology	<ul style="list-style-type: none"> <li>• Utilizing THO Dashboard Modules</li> <li>• Tips for Conducting a Virtual Meeting</li> <li>• Webinars</li> <li>• Meetings</li> </ul>
ADD A ROW function Note: Rows will be able to be added for each additional training			

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

Year One \$0      Year Two \$0

[Prepopulated with the budget allocation for years one and two under 7.9a]

- 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. **[Narrative, 2500 characters]**

TACA is embarking on a strategic planning process that provides a catalyst for long-term investment into the state's community action network. TDHS has established a standard monthly meeting to discuss training and technical assistance collaborations and partnering to support CSBG eligible agencies. As a result, TDHS will establish a partner contract with TACA for investing a portion of the state's administrative funds to provide training and technical assistance through initiatives outlined in the TACA strategic plan.

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

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

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

TDHS has placed one of the agencies on a Quality Improvement Plan (QIP) after multiple, un-remediated deficiencies within the COE Organizational Standards, which the agency has not alleviated through a Corrective Action Plan (CAP) or a Training Assistance Plan (TAP) and has plans to initiated another Quality Improvement Plan (QIP) with another agency after continued issues with unresponsiveness of communications and missed deadlines. TDHS plans to take an active role in engaging these agencies in supportive grant management and continue to offer training and technical assistance as requested to alleviate the findings and concerns of communication.

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

- ☐ CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds) **[Numeric response, 0 – 100]** 20
- ☐ Other community-based organizations
- ☐ State Community Action Association
- ☐ Regional CSBG technical assistance provider(s)

- ☐ National technical assistance provider(s)
- ☐ Individual consultant(s)
- ☐ Tribes and Tribal Organizations
- ☐ Other [Narrative, 1000 characters]

- 8.4. Performance Management Adjustment:** Describe adjustments the state made to the training and technical assistance plan under this State Plan as compared to past plans. Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. **[Narrative, 2500 Characters]**

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

TDHS will develop a State Office Training and Technical Assistance Action Plan in conjunction with TACA. TDHS has established a standard monthly meeting to discuss training and technical assistance collaborations and partnering to support CSBG eligible agencies. TDHS will partner with TACA by investing a portion of the state's administrative funds to provide training and technical assistance through TACA, as well as the development of a strategic plan that provides a catalyst for long-term investment into the state's community action network.

TDHS will build relationship with community action agencies by conducting annual conversation with each agency about fund utilization, grant management and training and technical assistance needs.

## SECTION 9

### State Linkages and Communication

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

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

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

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

**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)). **[Narrative, 5000 Characters]**

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

TDHS has established active partnerships both internally and externally to help facilitate and encourage linkage and coordination between agencies and other governmental and community partners. TDHS is actively involved in the State Coordinated Community Response (CCR), the TDHS Workforce Council, and the Workforce Innovation Opportunity Act (WIOA) Workforce Board. The Statewide CCR consists of eighteen (18) state divisions and two key stakeholders that have a role in protecting older and vulnerable adults to provide support and coordinate local resources. The TDHS Workforce Council consists of TDHS internal stakeholders who have a vested interest in improving educational and employment outcomes, and works in concert with the WIOA Workforce Board, which provides leadership and guidance to Tennessee's Workforce Development System. TDHS will collaborate with State-agencies and WIOA Partners to work across agency/programmatic boundaries to:

- provide mutual area customers with the best combination of education/employment services;
- network with community partners to engage with area employers through DHS sponsored Education/Employment Resource Fairs held in all regions of the state;
- analysis of existing programs, industry priorities, best practices, and metrics for success and continuous improvement.

In addition, TDHS actively participates in Tennessee Association of Community Action (TACA) and Tennessee Association of Human Resource Agencies (TAHRA) monthly and quarterly meetings and conferences and meets at least quarterly with the Tennessee

Housing Development Agency (THDA) to ensure the coordination to housing and energy assistance.

Other identified linkages for building relationships and collaborations with our CSBG Network include but not limited to:

- Continuum of Care (CoC)
- Tennessee Association of Community Action (TACA)
- Tennessee Housing Development Agency (THDA)
- Tennessee Department of Labor & Workforce
- Tennessee Department of Health (State & Local Counties)
- Workforce Innovation and Opportunity Act (WIOA)
- TDHS Food Programs & Social Services Block Grant (SSBG)
- United Way (Local and Regional)
- Customer-based Advocates

A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals, primarily using funding received through U.S. Department of Housing and Urban Development (HUD).

The Workforce Innovation and Opportunity Act (WIOA) program is administered by the Tennessee Department of Labor & Workforce Development. WIOA includes four (4) partner programs: Workforce Services, Adult Education, Wagner Peyser, and Vocational Rehabilitation.

It is also important that the State Office and CSBG Eligible Entities seek to include and engage the customer's voice to promote effective delivery of and coordination of CSBG services to low-income communities by utilizing the Human Service Value Curve (HSVC) framework. Through this linkage and coordination, we will together move the needle of community impact to build a network of customer-based advocates to move beyond the need for services to self-sufficiency.

### 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)). **[Narrative, 5000 Characters]**

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

Through the CSBG Contract, each agency is required to develop interagency planning, coordination, and collaboration at the agency and community level to

achieve the highest level of services, strategies, coordination, collaboration, and integration of services. Before TDHS approves an agency's CSBG Community Action Plan, the agency is required to provide a narrative explanation about how they partner with key stakeholders to coordinate and establish linkages through an effective delivery and coordination of CSBG services to low-income people and communities, by addressing the gaps in services, and the duplication of services.

TDHS and CSBG Task Force worked together to review and provide CSBG State Plan Focus Areas for the next two years to support linkages, which include the following:

- Training/Technical Assistance
- Communication
- Performance Management
- Organizational Standards Assessment
- Fund Utilization

TDHS monitors these service delivery strategies throughout the year through monthly, quarterly, and annual reporting provided by agencies. In addition, agencies have developed local service directories listing links and resources, online and through brochures, and respective information and referral systems.

**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. **[Narrative, 5000 Characters]**

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

Before the TDHS accepts the agency's Community Action Plan and Application, the CSBG agency is required to submit a copy of the agency's Community Needs Assessment, Strategic Plan, and provide a narrative explanation about how the agency plans to address the local community needs and gaps in services through a provision of services and strategies.

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

☐ Yes ☐ No



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

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

In January 2020, the State Workforce Development Board presented to the Governor the 2020 Goals for the State Workforce Development Board, which include five (5) priorities to sustain and grow Tennessee's robust economy and continue to advance the mission for Tennessee to become the premier workforce system in the nation.

Through quarterly workgroups covering the following key areas will correspond and provide charters to State Workforce Development Board:

1. Fiscal & Reporting
2. Joint Monitoring & Compliance
3. Service Delivery & Integrated Workforce Strategy
4. Apprenticeship & Work -Based Learning
5. Data & Performance

Each workgroup is committed to implementing initiatives in collaboration with partners to build a skilled and educated workforce under following five (5) priorities outlined by the State Workforce Development Board:

1. Create an Integrated Intake System to Efficiently Deliver Services
  - a. Integrate Services from All Workforce Partners;
  - b. Foster and Encourage Increased Collaboration and Alignment among Workforce Partners;
  - c. Integrate the Case Management and Finance System; and
  - d. Create New Unified Programs based on the New Strategy for Integration
2. Create a Shared Vision for Supporting Tennesseans with the Greatest Number of Barriers to Enter the Workforce
  - a. Create an Integrated Communications Plan to Foster Collaboration Among Workforce Partners; and
  - b. Build Capacity to Allow for Integration and Improved Service Delivery
3. Create a Trained Workforce to Meet Current Industry Needs
4. Create New Dashboards to Measure the Effectiveness of the Integrated Workforce Strategy

- a. Improve Overall Accountability; and
  - b. Establish Shared Objectives Among Workforce Partners
5. Create a Simple and Effective Engagement Experience for All Candidates

Although CSBG is not a core partner in the WIOA Combined Plan, CSBG is a required partner for one-stop operations and programs and services. TDHS and CSBG roles in the workgroups will foster collaboration and continued alignment for the next iteration of the WIOA Combined State Plan.

TDHS will continue to facilitate coordination of programs and activities conducted by the agencies and other neighborhood-based organizations in developing employment and education training activities as needed in coordination with State and Local Workforce Development Area (LWDA) and as outlined through their CSBG Community Action Plan.

**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. **[Narrative, 5000 Characters]**

**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). **[Narrative, 5000 Characters]**

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

TDHS has an active partnership with the Tennessee Housing Development Agency (THDA) and meets at least quarterly to collaborate regarding agency monitoring, fiscal policy and programmatic updates to align eligibility, services, and strategies between the two entities.

**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. **[Narrative, 5000 characters]**

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

CSBG agencies are required to identify organizations used to link services and coordinate/leverage funding to meet the needs of clients, including city and county

governments, faith-based organizations, non-profits organizations, and state agencies in their CSBG Community Action Plans.

CSBG agencies are also required to list how linkages have been established or developed to fill identified gaps in services and coordinate funding with other public and private resources in the area. Agencies are to further describe existing partnerships, coalitions, and collective impact efforts their agency has established to address the needs of their community (e.g., domestic violence, homelessness, teen pregnancy prevention, transportation, task forces, and community economic development projects).

TDHS monitors these services and strategies throughout the year through monthly, quarterly, and annual reporting provided by the agencies.

**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. **[Narrative, 5000 Characters]**

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

Every effort is made to coordinate all funding sources. TDHS will continue to keep CSBG agencies updated on funding opportunities, and continue TDHS's partnership with TACA to provide training at the TACA Quarterly Meetings and Annual Conference to facilitate additional opportunities for funding and outreach.

Through the CSBG Contract, each agency is required to develop interagency planning, coordination, and collaboration at the agency and community level to achieve the highest level of services, strategies, coordination, collaboration, and integration of services. Before TDHS approves an agency's CSBG Community Action Plan, the agency is required to provide a narrative explaining how they partner with key stakeholders to coordinate and establish linkages through an effective delivery and coordination of CSBG services to low-income people and communities, by addressing the gaps in services, and the duplication of services.

Services and strategies are monitored throughout the year through monthly, quarterly, and annual reporting provided by agencies. In addition, agencies have developed local service directories, listing links and resources, online and through brochures, and respective information and referral systems.

**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. **[Narrative, 5000 Characters]**

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

TACA meets quarterly, and through the TACA Annual Conference, with Executive Leadership and Outcome Advisors. Committee and task force meetings are conducted throughout the year as needed. In addition, the TACA Executive Director keeps the

TDHS actively partners with the TACA to provide training and technical assistance in developing and implementing strategies to combat poverty in the state. Together, the two entities partner to train staff across the State in Results-Oriented Management and Accountability (ROMA), along with 6 Certified ROMA Trainers (NCRTs). The two entities meet monthly to develop T/TA Plans, provide training, exchange program updates, and seek feedback and input from the agencies.

**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.

Communication Plan			
Subject Matter	Expected Frequency	Format	Brief Description of "Other"
Upcoming Public and/or Legislative Hearings	<b>[Dropdown Options:</b> <ul style="list-style-type: none"> <li>• Daily</li> <li>• Weekly</li> <li>• Twice-Monthly</li> <li>• Monthly</li> <li>• Quarterly</li> <li>• Semi-Annually</li> <li>• Annually</li> <li>• Biannual</li> <li>• Triennial</li> <li>• As needed</li> <li>• Upon Request</li> <li>• Not Applicable]</li> </ul>	<b>[Select All That Apply:</b> <ul style="list-style-type: none"> <li>• Newsletters</li> <li>• Mailing</li> <li>• Meetings/Presentations</li> <li>• Blog</li> <li>• Email</li> <li>• Website</li> <li>• Social Media</li> <li>• Webinar</li> <li>• 1:1</li> <li>• Phone Calls</li> <li>• Public Notice</li> <li>• Letters/Hard Copies</li> <li>• Other]</li> </ul>	If "Other" is selected in Columns 3, describe in this column.  <b>[Narrative, 250 characters]</b>
State Plan Development			
Organizational Standards Progress			
State Accountability Measures Progress			
Community Needs Assessments/Community Action Plans			
State Monitoring Plans and Policies			
Training and Technical Assistance (T/TA) Plans			
ROMA and Performance Management			
State Interagency Coordination			
CSBG Legislative/Programmatic Updates			
Tripartite Board Requirements			
<b>ADD A ROW function</b> Note: Rows will be able to be added for each additional training			
Upcoming Public and/or Legislative Hearings	<ul style="list-style-type: none"> <li>• Annually</li> <li>• Biannual</li> </ul>	<ul style="list-style-type: none"> <li>• Email</li> <li>• Website</li> </ul>	

Public Notice is provided for upcoming public and legislative hearings, is placed on the state's website and calendar of events. In addition, an email is sent to CSBG eligible entities advising them of upcoming hearings.		<ul style="list-style-type: none"> <li>Public Notice</li> </ul>	
<p>State Plan Development</p> <p>Engage the CSBG Task Force in meeting and survey to capture feedback and recommendations.</p> <p>Emails sent prior to meeting, post draft of State Plan on website for public comment i.e., Quarterly TACA Meeting (s), agencies engaged to provide feedback, information presented at meeting (s) and TACA Annual Conference.</p>	<ul style="list-style-type: none"> <li>Biannual</li> </ul>	<ul style="list-style-type: none"> <li>Email</li> <li>Meetings / Presentations</li> <li>Website</li> <li>Phone Calls</li> </ul>	
<p>Organizational Standards</p> <p>Email sent to agencies advising of annual desk review requesting submission of documents. During the review staff may contact agency for additional information. At conclusion of review, a management letter will be sent via email to advise of the findings.</p>	<ul style="list-style-type: none"> <li>Annually</li> </ul>	<ul style="list-style-type: none"> <li>Email</li> <li>Phone</li> <li>Letters</li> </ul>	
<p>State Accountability Measures Progress</p> <p>Annual updates are provided during meeting, i.e., Quarterly TACA Meeting of State's ability to meet State Accountability Measures, as outlined through the CSBG Annual Report, and as a result of the American Customer Satisfaction Index (ACSI) results. Once information is received from Office of Community Services (OCS), it is</p>	<ul style="list-style-type: none"> <li>Annually</li> <li>Biannual</li> </ul>	<ul style="list-style-type: none"> <li>Meetings / Presentations</li> <li>Email</li> </ul>	

forwarded via email to the agencies.			
<p>State Accountability Measures Progress</p> <p>Agencies submit monthly/quarterly reports. Staff collaborates with agencies in Fund Utilization and T/TA Listening Sessions to review agency's progress, and offer T/TA. Annual updates are provided during meeting (s), i.e., Quarterly TACA Meeting of Agency's ability to meet performance management goals.</p>	<ul style="list-style-type: none"> <li>Annually</li> </ul>	<ul style="list-style-type: none"> <li>Meetings / Presentations</li> <li>1:1</li> <li>Letters</li> <li>Phone</li> </ul>	
<p>Community Needs Assessments/Community Action Plans</p> <p>Per Policy &amp; Procedure Manual, agencies are required to submit copies of their Community Needs Assessment triennially but have option to submit an CNA amendment if needs change throughout the 3 years. CSBG Community Action Plan are submitted annually with options to CAP amendment as changes within programs arise.</p>	<ul style="list-style-type: none"> <li>Triennial</li> <li>Annually</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Other</li> </ul>	CSBG Community Action Plan and Application
<p>State Monitoring Plans and Policies</p> <p>Agencies are advised during meetings, i.e., Quarterly TACA meetings, as a part of the State Plan development, and annual updates, and training. In addition, a copy of the policy procedure manual is emailed and posted to the state website.</p> <p>Engage the CSBG Task Force in meeting and survey to capture feedback and recommendations.</p>	<ul style="list-style-type: none"> <li>Annually</li> <li>As Needed</li> </ul>	<ul style="list-style-type: none"> <li>Meetings / Presentations</li> <li>Other</li> <li>Email</li> <li>Website</li> </ul>	Policy Procedure Manual

<p>Training and Technical Assistance (T/TA) Plans</p> <p>Agencies are advised during meetings, i.e., Quarterly TACA meetings, of T/TA Plans developed annual and as a part of the Model State Plan. In addition, opportunities for T/TA are offered through management letters, and disseminated via email.</p> <p>Staff collaborates TACA annually through survey and meeting to discussed T/TA priorities. Staff engage with agencies in Fund Utilization and T/TA Listening Sessions to review agency's progress, and offer T/TA.</p>	<ul style="list-style-type: none"> <li>• Annually</li> <li>• Biannual</li> </ul>	<ul style="list-style-type: none"> <li>• Meetings / Presentations</li> <li>• Letters</li> <li>• Email</li> <li>• Phone Calls</li> <li>• 1:1</li> </ul>	
<p>ROMA and Performance Management</p> <p>Agencies advised via contract, and are required to establish plans through CSBG Community Action Plans, Corrective Action Plans, etc. In addition, TACA coordinates training opportunities throughout the state to facilitate training.</p>	<ul style="list-style-type: none"> <li>• Annually</li> </ul>	<ul style="list-style-type: none"> <li>• Other</li> <li>• Meetings / Presentations</li> <li>• Emails</li> </ul>	Contract; CSBG Community Action Plans
<p>State Interagency Coordination</p> <p>Updates are provided at the TACA Quarterly Meetings</p> <p>State Office provides a weekly communication to provide updates, key reminders, and national partners training opportunities.</p>	<ul style="list-style-type: none"> <li>• Quarterly</li> <li>• Weekly</li> </ul>	<ul style="list-style-type: none"> <li>• Meetings / Presentations</li> <li>• Email</li> </ul>	
<p>CSBG Legislative/Programmatic Updates</p> <p>Updates are provided at meetings, i.e., TACA Quarterly Meetings, and sent via email and through blogs from our national partners.</p>	<ul style="list-style-type: none"> <li>• Quarterly</li> <li>• As needed</li> </ul>	<ul style="list-style-type: none"> <li>• Meetings / Presentations</li> <li>• Emails</li> <li>• Blogs</li> </ul>	

<p>Tripartite Board Requirements</p> <p>Updates are sent via email from our national partners, information is provided through partner websites, and provided through board orientation, training, and training at the TACA Annual Conference.</p>	<ul style="list-style-type: none"> <li>• Annually</li> <li>• As needed</li> </ul>	<ul style="list-style-type: none"> <li>• Email</li> <li>• Websites</li> <li>• Meetings / Presentations</li> </ul>	

**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. **[Narrative, 5000 Characters]**

**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.

Once TDHS receives feedback from the American Customer Satisfaction Index, TDHS will provide a summary of the feedback to agencies within sixty days, and develop a plan based upon the results and feedback provided. Throughout the year TDHS submits the CSBG Annual Report, National Performance Indicators (NPIs), the Performance Management and Accountability Measures, and American Customer Satisfaction Index (ACSI) Results via email to stakeholders within sixty days of completion of each item.

**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. **[Narrative, 5000 Characters]**

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

TDHS provides updates during the TACA Quarterly Meetings and TACA Annual Conference. In addition, TDHS will host at least 2 webinars, meetings, and provide newsletter updates at least quarterly to actively engage agencies. CSBG will maintain a weekly Director's email and also partner with TACA to disseminate information through periodic newsletters and blogs through social media.



TDHS will provide continued fund utilization and grant management and training/technical assistance calls with each agency and will maintain this level of engagement with CSBG eligible entities over the next two years as a form of performance management.

## 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”
Narrative, 150 characters	<b>[Dropdown Options:</b> <ul style="list-style-type: none"> <li>Full On-Site</li> <li>Newly Designated</li> <li>Follow-up</li> <li>Other</li> <li>No Review]</li> </ul>	<b>[Dropdown Options:</b> <ul style="list-style-type: none"> <li>Onsite Review</li> <li>Desk Review]</li> </ul>	<b>[Dropdown Options:</b> <ul style="list-style-type: none"> <li>FY1 Q1</li> <li>FY1 Q2</li> <li>FY1 Q3</li> <li>FY1 Q4]</li> </ul>	Select a Date	Select a Date	If “Other” is selected in Column 2, describe in this column  <b>[Narrative, 500 characters]</b>
Anderson County CAC	Full On-Site	Onsite Review	FY1 Q2	2/5/22	2/9/22	Integrated Full On-Site Review with TDHS OIG Audit Services Review with Organizational Standards of Regular CSBG

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”
						and CARES
Blount County CAA	Full On-Site	Onsite Review	FY1 Q4	9/18/22;	9/21/22;	Integrated Full On-Site Review with TDHS OIG Audit Services Review with Organizational Standards of Regular CSBG and CARES
Bradley-Cleveland CSA	Other	Desk Review	FY1 Q2	3/21/22	3/23/22	Annual Desk Review of Organizational Standards
Chattanooga OFE	Other	Desk Review	FY1 Q2	3/19/22	3/22/22	Annual Desk Review of Organizational Standards
Clarksville-Montgomery CAA	Other	Desk Review	FY 1 Q2	2/15/22	2/17/22	Annual Desk Review of Organizational Standards
Delta HRA	Other	Desk Review	FY1 Q2	2/25/22	3/3/22	Annual Desk Review of Organizational Standards
Douglas-Cherokee EA	Full On-Site	Onsite Review	FY1 Q3	5/17/22	5/24/22	Integrated Full On-Site Review with TDHS OIG Audit Services Review with Organizational Standards of Regular CSBG and CARES
Highland Rim	Other	Desk Review	FY1 Q2	3/14/22	3/16/22	Annual Desk Review of Organizational Standards
Knox CAC	Other	Desk Review	FY1 Q2	2/14/22	2/23/22	Annual Desk Review of Organizational Standards
Metropolitan Action Commission	Full On-Site	Onsite Review	FY1 Q2	3/25/22	5/24/22	Integrated Full On-Site Review with TDHS OIG Audit Services Review with

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”
						Organizational Standards of Regular CSBG and CARES
Mid-Cumberland CAA	Full On-Site	Onsite Review	FY1 Q3	5/17/22	5/26/22	Integrated Full On-Site Review with TDHS OIG Audit Services Review with Organizational Standards of Regular CSBG and CARES
Mid-East CAA	Other	Desk Review	FY1 Q2	3/18/22	3/23/22	Annual Desk Review of Organizational Standards
Mt. Valley EOA	Full On-Site	Onsite Review	FY Q3	5/24/22	6/8/22	Integrated Full On-Site Review with TDHS OIG Audit Services Review with Organizational Standards of Regular CSBG and CARES
Northwest TN EDC	Other	Desk Review	FY 1 Q2	2/23/22	2/28/22	Annual Desk Review of Organizational Standards
Shelby County CSA	Other	Desk Review	FY 1 Q2	2/27/22	3/1/22	Annual Desk Review of Organizational Standards
SCHRA	Other	Desk Review	FY1 Q2	3/25/22	4/10/22	Annual Desk Review of Organizational Standards
SETHRA	Full On Site	Onsite Review	FY Q3	5/18/22	5/29/22	Integrated Full On-Site Review with TDHS OIG Audit Services Review with Organizational Standards of Regular CSBG and CARES
SWHRA		Desk	FY1 Q2	3/10/22	3/13/22	Annual Desk

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”
	Other	Review				Review of Organizational Standards
UCHRA	Other	Desk Review	FY1 Q3	6/17/22	6/25/22	Annual Desk Review of Organizational Standards
UETHDA	Other	Desk Review	FY1 Q2	1/31/22	2/2/22	Annual Desk Review of Organizational Standards

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”
This column will auto-populate from the CSBG Eligible Entity Master List	<b>[Dropdown Options:</b> <ul style="list-style-type: none"> <li>Full On-Site</li> <li>Newly Designated</li> <li>Follow-up</li> <li>Other</li> <li>No Review]</li> </ul>	<b>[Dropdown Options:</b> <ul style="list-style-type: none"> <li>Onsite Review</li> <li>Desk Review]</li> </ul>	<b>[Dropdown Options:</b> <ul style="list-style-type: none"> <li>FY2 Q1</li> <li>FY2 Q2</li> <li>FY2 Q3</li> <li>FY2 Q4]</li> </ul>	Select a Date	Select a Date	If “Other” is selected in Column 2, describe in this column  <b>[Narrative, 500 characters]</b>
Anderson County CAC	Other	Onsite Review	FY2 Q2	2/5/23	2/9/23	Annual Desk Review of Organizational Standards
Blount County CAA	Other	Desk Review	FY2 Q2	3/18/23	3/21/23	Annual Desk Review of Organizational Standards
Bradley-Cleveland CSA	Full On-Site	Onsite Review	FY2 Q3	7/21/23	7/23/23	Integrated Full On-Site Review with TDHS OIG Audit Services Review with Organizational Standards of Regular CSBG and CARES
Chattanooga OFE	Other	Desk Review	FY 2 Q2	3/19/22	3/22/22	Annual Desk Review of

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"
						Organizational Standards
Clarksville-Montgomery CAA	Full On-Site	Onsite Review	FY2 Q2	2/15/23	2/17/23	Integrated Full On-Site Review with TDHS OIG Audit Services Review with Organizational Standards of Regular CSBG and CARES
Delta HRA	Other	Desk Review	FY2 Q4	9/25/23	10/3/23	Annual Desk Review of Organizational Standards
Douglas-Cherokee EA	Other	Desk Review	FY2 Q2	3/17/23	3/24/23	Annual Desk Review of Organizational Standards
Highland Rim	Other	Desk Review	FY2 Q2	3/14/23	3/16/23	Annual Desk Review of Organizational Standards
Knox CAC	Full On-Site	Onsite Review	FY2 Q2	2/14/23	2/28/23	Integrated Full On-Site Review with TDHS OIG Audit Services Review with Organizational Standards of Regular CSBG and CARES
Metropolitan Action Commission	Other	Desk Review	FY2 Q2	3/15/23	3/24/23	Annual Desk Review of Organizational Standards
Mid-Cumberland CAA	Other	Desk Review	FY2 Q2	2/17/23	2/26/23	Annual Desk Review of Organizational Standards
Mid-East CAA	Other	Desk Review	FY2 Q2	3/18/23	3/30/23	Annual Desk Review of Organizational Standards
Mt. Valley EOA	Other	Desk Review	FY2 Q2	2/24/23	3/8/23	Annual Desk Review of Organizational Standards

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"
Northwest TN EDC	Full On-Site	Onsite Review	FY2 Q3	6/23/23	7/2/23	Integrated Full On-Site Review with TDHS OIG Audit Services Review with Organizational Standards of Regular CSBG and CARES
Shelby County CSA	Full On-Site	Onsite Review	FY2 Q4	7/27/23	8/15/23	Integrated Full On-Site Review with TDHS OIG Audit Services Review with Organizational Standards of Regular CSBG and CARES
SCHRA	Other	Desk Review	FY2 Q2	2/25/23	3/10/23	Annual Desk Review of Organizational Standards
SETHRA	Other	Desk Review	FY2 Q2	3/18/23	3/29/23	Annual Desk Review of Organizational Standards
SWHRA	Full On-Site	Onsite Review	FY2 Q3	7/10/23	7/30/23	Integrated Full On-Site Review with TDHS OIG Audit Services Review with Organizational Standards of Regular CSBG and CARES
UCHRA	Other	Desk Review	FY2 Q2	2/17/23	3/1/23	Annual Desk Review of Organizational Standards
UETHDA	Full On-Site	Onsite Review	FY2 Q4	8/3/23	8/25/23	Integrated Full On-Site Review with TDHS OIG Audit Services Review with Organizational Standards of Regular CSBG and CARES

**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. **[Attach a document or add a link]**

See attached

**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? **[Insert a number from 1 – 100]** **45**

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

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

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

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

Once the agency submits a corrective action plan, the corrective action plan is accepted, and TDHS is able to verify that the findings have been alleviated, TDHS will close the findings. If the agency is unable to resolve the findings through their Corrective Action Plan, the agency will receive training and technical assistance through either a Training Assistance Plan (TAP) or Quality Improvement Plan (QIP).

**10.5. Quality Improvement Plans (QIPs):** Provide the number of eligible entities currently on QIPs, if applicable. **[Numeric Response, 0 – 100]** **2**

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

**10.6. Reporting of QIPs:** Describe the state’s process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the state approving a QIP? **[Narrative, 5000 characters]**

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

During the assessment process, if TDHS finds an agency is not meeting performance goals, administrative standards, financial management requirements, and other requirements to ensure an appropriate level of accountability, there are several, escalating courses of action.

If Agencies are unable to alleviate the findings through a Corrective Action Plan (CAP) then a Training Assistance Plan (TAP) may be required. If the number of findings warrants a Quality Improvement Plan (QIP), TDHS may initiate action in accordance with section 678C of the CSBG Act (42 U.S.C. § 9915), to establish clear timelines and benchmarks and will notify the Office of Community Services within thirty (30) calendar days of placing an agency on a Quality Improvement Plan. Continued failure of an agency to meet the standards may result in de-designation.

At any point, TDHS may determine whether it is necessary to take additional actions, including the reduction of funding, or termination of funding in accordance with CSBG IM 116 (Corrective Action, Termination, or Reduction of Funding), issued May 1, 2012.

- 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. **[Narrative, 2500 Characters]**

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

Section 676A of the CSBG Act outlines procedures for designation and re-designation of eligible entities in un-served areas. In accordance with the CSBG Act, a state may solicit applications and designate as an eligible entity either:

- A private nonprofit organization that is geographically located in the un-served area that is capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency and meets the requirements of the CSBG Act; or



- A private nonprofit eligible entity that is geographically located in an area contiguous to or within reasonable proximity of the un-served area and is already providing related services in the un-served area.

TDHS will grant the designation to an organization of demonstrated effectiveness in meeting the goals of the CSBG Act, and may give priority to an eligible entity in a contiguous area that is already providing related services in the un-served area. If no private, nonprofit organization is identified or determined to be qualified as an eligible entity to serve the area, TDHS may designate an appropriate political subdivision of the State to serve as an eligible entity for the area.

Any nonprofit or public agency receiving CSBG funds must meet the tripartite board requirements specified in Section 676B of the CSBG Act. The process of soliciting applications to select a new eligible entity may take place during the period in which the Department of Health and Human Services is reviewing a State decision to terminate an organization's eligibility for CSBG funds.

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

**10.9a. Termination Citation:** If yes, provide the citation(s) of the law and/or regulation. [Narrative, 2500 characters]

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

As outlined in CSBG IM 116 (Corrective Action, Termination, or Reduction of Funding), issued May 1, 2012, TDHS will communicate the specific deficiency (ies) to the agency, and request that the agency correct the deficiency (ies) (i.e., findings). The findings will be communicated through management letters. TDHS will offer training and technical assistance, if appropriate, to help an agency correct the identified deficiencies or findings to meet state requirements.

Agencies may opt to correct the findings without additional training and technical assistance from the state. Agencies that require training and technical assistance will either be placed on a Training Assistance Plan (TAP) or Quality Improvement Plan (QIP) depending on the seriousness of the deficiency and the time reasonably required to correct the deficiency.

If TDHS determines that training and technical assistance are not appropriate, TDHS will prepare a report to the Secretary of the U.S. Department of Health and Human Services stating the reasons that technical assistance is not appropriate.

Some examples of situations in which a State may determine that technical assistance is not appropriate may include, but are not limited, to the following:

- A deficiency for which the eligible entity has the expertise and skills available within the organization to make corrective actions without assistance;
- A deficiency for which the State has previously provided technical assistance and the eligible entity has failed to institute corrective actions;
- Multiple, widespread, and/or repeated deficiencies that cannot feasibly be addressed through technical assistance;
- A deficiency that involves evidence of fraudulent reporting or use of funds, or other evidence of criminal wrongdoing.

As outlined in Section 678C(a)(5) of the CSBG Act, the TDHS will provide adequate notice and opportunity for a hearing prior to terminating organizational eligibility for CSBG funding or otherwise reducing the proportional share of funding to an entity for cause. After providing an opportunity for a hearing, if the state finds cause for termination or reduction in funding, TDHS may initiate proceedings to terminate the designation of or reduce the funding to an agency unless the entity corrects the deficiency. If TDHS determines that funding will be reduced or that eligibility for CSBG funds will be terminated, TDHS will notify both the agency and the Office of Community Services of the decision.

A Federal review of the state decision to reduce or terminate funding may be initiated through a request from the affected organization. In accordance with 45 CFR §96.92, an eligible entity has 30 days following notification by the state of its final decision to request a review by the Secretary of the Department of Health and Human Services.

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

**10.10a. Re-Designation Citation:** If yes, provide the citation(s) of the law and/or regulation. **[Narrative, 2500 Characters]**

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

**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.

The process for re-designation would be the same as Item 108b, Designation of eligible entities. In accordance with CSBG IM 116 (Corrective Action, Termination, or Reduction of Funding), issued May 1, 2012, in the event that TDHS terminates the designation of an organization as an eligible entity, or otherwise reduces funds, any resulting funding may be awarded only to an organization that is an eligible entity for CSBG funds. Section 676A of the CSBG Act outlines procedures for designation and re-designation of eligible entities in un-served areas. In accordance with the CSBG Act, a State may solicit applications and designate as an eligible entity either:

- A private nonprofit organization that is geographically located in the un-served area that is capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency and meets the requirements of the CSBG Act; or
- A private nonprofit eligible entity that is geographically located in an area contiguous to or within reasonable proximity of the un-served area and is already providing related services in the un-served area.

TDHS will grant the designation to an organization of demonstrated effectiveness in meeting the goals of the CSBG Act, and may give priority to an eligible entity in a contiguous area that is already providing related services in the un-served area. If no private, nonprofit organization is identified or determined to be qualified as an eligible entity to serve the area, TDHS may designate an appropriate political subdivision of the State to serve as an eligible entity for the area.

Any nonprofit or public agency receiving CSBG funds must meet the tripartite board requirements specified in Section 676B of the CSBG Act. The process of soliciting applications to select a new eligible entity may take place during the period in which the Department of Health and Human Services is reviewing a State decision to terminate an organization's eligibility for CSBG funds.

## **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). **[Narrative, 5000 Characters]**

The SF-425 report is based on data from Edison, the statewide fiscal reporting system for suppliers and employees, and the GL63f query of expenditures by account covering the period of October through the following September each year. It includes all expenditures to the CSBG grants both indirect and direct for all departmental areas.

All expenditures will have a grant-specific project, which in this case is CSBG. The chart field , which is the data field containing accounting information, explains the nature of the transaction for internal and external reporting. Payments to sub-recipients have a required set up of backup documents that detail how the agency spent funds.

To ensure proper use of the funds, TDHS monitors agencies through onsite monitoring and reviews the specific expenses to determine whether agencies have used funds properly. The state's Department of Finance & Administration, which handles TDHS fiscal functions, also has a draw ledger of Federal funds to record the state's reimbursement of the direct and indirect expenditures incurred in the administration of the CSBG program.

- 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. **[Narrative, 5000 Characters]**

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

[See attachment](#)

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

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

- 10.14. Performance Management Adjustment:** Describe any adjustments the state made to monitoring procedures in this State Plan as compared to past plans? Any adjustment should be based on the state's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the state is not making any adjustments, provide further detail. **[Narrative, 2500 Characters]**

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

[The Office of Inspector General \(OIG\) and CSBG Program Staff will meet annually to](#)

discuss and coordinate possible adjustments needed to the monitoring process. OIG and CSBG Program Staff will engage throughout the year on monitoring requirements, needed documentation, and updates on CSBG agencies monitoring schedule. Both OIG and CSBG Program Staff will utilize the Center of Excellence's Organizational Standards agency self-assessment and State Office Assessment to ensure that all agencies have appropriate organizational capacity, in both critical financial and administrative areas, as well as areas of unique importance to the mission of the Community Action network.

## **SECTION 11**

### **Eligible Entity Tripartite Board**

- 11.1. Tripartite Board Verification:** Verify which of the following measures are taken to ensure that the state verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B(a)(2) of the CSBG Act. **[Check all that applies and narrative where applicable]**
- ☐ Attend Board meetings
  - ☐ Organizational Standards Assessment
  - ☐ Monitoring
  - ☐ Review copies of Board meeting minutes
  - ☐ Track Board vacancies/composition
  - ☐ Other **[Narrative, 2500 characters]**
- 11.2. Tripartite Board Updates:** Provide how often the state requires eligible entities (which are not on TAPs or QIPs) to provide updates regarding their Tripartite Boards. This includes but is not limited to copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc. **[Select one and narrative where applicable]**
- ☒ Annually
  - ☐ Semiannually
  - ☐ Quarterly
  - ☐ Monthly
  - ☐ As It Occurs
  - ☐ **Other** **[Narrative, 2500 characters]** Agencies are required through the CSBG Contract to advise TDHS of board vacancies within 10 days and fill vacancies within 90 days. TDHS will provide Tennessee's network of Community Services Block Grant (CSBG)-eligible Community Action Agencies (CAAs) with guidance to aid in service delivery during a time of emergency circumstances related to Tripartite Board and CSBG requirements.
- 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. **[Narrative, 2500 Characters]**

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

Before TDHS approves an agency's CSBG Community Action Plan and Application, agency staff must submit information demonstrating that their Board of Directors complies with the requirements established by the CSBG Re-Authorization Act. CSBG Program Staff and TDHS OIG Audit Services Staff further assess this requirement as part of the annual program review of each agency.

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

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

Tennessee Code Annotated § 13-26-102 established the Human Resources Act of 1973, designating the establishment of human resource agencies, five (5) of which are community action agencies.

Tennessee Code Annotated § 13-26-103 established how each of the human resource agencies governing board and policy board are to be established. Specifically that the membership of the policy council shall be broadly based and equitably distributed between providers and consumers of the human resource services and/or established by public law.

## Section 12

### Individual and Community Income Eligibility Requirements

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

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

**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. **[Narrative, 5000 Characters]**

To be eligible for CSBG services or benefits, clients must be at or below the federal poverty line as determined by the federal Office of Management and Budget (OMB) based on the most recent federal Census data and as revised annually (or more frequently) by U.S. Department of Health and Human Services' Poverty Guidelines. Income eligibility and documentation of the client's need for service must be completed in order to establish client eligibility prior to delivery of services. In order to determine the eligibility of an individual or family to receive service, a determination of citizenship or qualified alien, need for the service, and financial eligibility according to the CSBG Income guidelines must be established. Attached is a copy of eligibility requirements for CSBG Policy & Procedure Manual.

- (1) The Tennessee Department of Human Services partners directly with CSBG eligible entities by assisting in the verification of client eligibility determination. This is accomplished via contractual agreements with the local eligible entities through which they are granted limited access to income verification for those individuals receiving Supplemental

Nutrition Assistance Program (SNAP), Families First (TANF), or Medicaid assistance.

- (i) To foster self-sufficiency, the primary services provided include case management and job training/education classes. Agencies have been encouraged to work with their local DHS offices when both are serving Families First (TANF) clients. In these situations, agencies have been successful developing resources not covered by the Families First program. Some agencies have hired Families First participants in the past year.
- (ii) Under the Employment Service, some agencies have created Job Development Staff positions. This staff works closely with local businesses and agencies to develop career opportunities for their client population rather than merely placing them in existing vacant positions.
- (iii) Sub-recipient agencies that provide Education, Employment, and Self-Sufficiency Services work to improve literacy skills of the low-income families in their communities.
- (iv) Under the income management service, some agencies are providing some financial counseling to their clients either directly, with volunteers, or by paying a credit counseling agency if applicable. All of the agencies have been provided information and training on the Financial Services Education Coalition (FSEC) manual title “Helping People in Your Community Understand Basic Financial Services”. Several agencies are using this material as a training resource for their clients. Several agencies have been working with the IRS to help their clients retrieve the Earned Income Tax Credit.
- (v) Under the Housing Service most agencies are completing “safety” repairs to homes that are identified during the Weatherization Program review. In this way the agencies are able to utilize much of the same staff and paperwork utilized in their companion program. Under the Income Management service, several agencies are using the CSBG funds to support the Weatherization Program.
- (vi) All twenty (20) agencies in 95 counties provide some level of Emergency Service to address basic needs. While all assist with eviction and utility shut-off notices, many assist with medical emergencies and food needs. Most of these emergency needs are handled with agency funds while networking activities provide the remainder. Several of the agencies also include a budget counseling program as a part of this service as a method to prevent further crisis situations. By screening the clients in this way, they are frequently able to identify additional client needs, develop a self-Sufficiency plan and thereby prevent another crisis.



- (vii) All agencies are required to select community-level goals based on their Needs Assessments. This determination is made at the local level.

**12.2. Income Eligibility for General/Short Term Services:** Describe how the state ensures eligible entities generally verify income eligibility for those services with limited in-take procedures (where individual income verification is not possible or practical). An example of these services is emergency food assistance. **[Narrative, 5000 Characters]**

With the exception of providing a free-standing information and referral service, persons receiving any CSBG service, must be within income guidelines and in need of the requested services. Eligibility for services must be determined either by client self-declaration or by the verification method.

- a. The verification method is used for services when monetary payments or tangible benefits purchased with CSBG funds are provided. All points of eligibility (need and income) must be verified prior to the customer receiving service. The necessary verifications must be obtained within ten (10) calendar days of the application date.
- b. Customer Self Declaration is the declaration method that can be used for all services unless monetary payments or tangible benefits purchased with CSBG funds are provided. EXCEPTION: If the tangible benefit is donated goods/food, clothing, household necessities, the declaration method can be used to determine eligibility. The applicant's statement of both need and income status will be entered in the appropriate spaces on the application form.

After all avenues of documenting income eligibility are exhausted, self-declaration is allowable, but evidence of the attempts at proving eligibility must be contained in the client file, including a statement signed by the applicant indicating that the individual has no other proof of income (Zero Income).

In Zero Income scenarios, it is necessary to obtain confirmation when a household unit has zero income. A current employer separation letter is acceptable when verifying zero income (within 30 days). Any household member eighteen (18) years and older claiming zero-income must have a Self-Declaration of Zero Income Statement signed by the Head of Household. All eligible entities will use the self-declaration statement even if household members are listed in ACCENT or provide a current employer separation letter.

The statement of support is a written document that must be attached to all applications for assistance by zero income households. The statement of support must be signed by the applicant and the support person who is supplying the information. It must describe the kind of support provided and indicate the relationship between the support person and the applicant.

The support statement should verify that the supporting person(s) have not received assistance claiming zero income. Agencies may require additional documentation and verification from support person as to the ability to provide support to multiple households. Agencies that are requiring additional verification must do so consistently for all applicants without bias.

Attached copy of eligibility requirements for CSBG Policy & Procedure Manual.

There are two different types of services provided through the Community Services Block Grant Program - intangible services and tangible services (as defined CSBG Policy & Procedure Manual). When an intangible service is provided, a certification period must be established at the point that eligibility is determined. For tangible services, it is sufficient to establish customer eligibility and a certification period is not required.

An eligible customer may be certified for any period of time extending up to, but no longer than, six months from the date eligibility was established, unless all members of the household are on a fixed income and no other income is present. When all members of the household are on fixed income from Social Security benefits, SSI benefits, or other pensions with no other income, the certification period may extend up to 12 months from the date eligibility was established. When a household consists of both members having fixed income, and members having other types of income, the eligibility period cannot exceed six months, when an exception for crisis-oriented emergency programs, in which the certification period cannot extend beyond 60 calendar days.

The effective date of eligibility is the date the customer signs the application when the declaration method is used and the date the agency worker verifies income when the verification method is used. Eligibility must not be determined retroactively.

Services and Strategies may be provided under the following domains:

- Employment
- Education and Cognitive Development
- Income, Infrastructure, and Asset Building
- Housing
- Health and Social/Behavioral Development (included nutrition)
- Civic Engagement and Community Involvement
- Services Supporting Multiple Domains
- Linkages (e.g. partnerships that support multiple domains)
- Agency Capacity Building
- Other (e.g., emergency management/disaster relief)

A certification period must be established for intangible services. A certification period is not required for tangible benefits or service activities performed on behalf of the customer by agency staff.

- 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). **[Narrative, 5000 Characters]**

The CSBG Contract allows for agencies to provide Community Organization / Brokerage/ Advocacy within each of the designated service categories to develop and implement projects which mobilize community resources to meet the needs of low-income persons to increase the community awareness, education, training, and to arrange for partnerships and coordinated initiatives.

## 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. **[Narrative, 5000 characters]**

The CSBG Policy & Procedure Manual outlines a framework for expectations for the CSBG Performance Management Framework (as listed below). In addition, the CSBG Policy & Procedure Manual provides guidance on how ROMA should be incorporated into the Community Needs Assessment and Planning process (see below).

#### CSBG Performance Management System Framework

The Performance Management Framework includes: 1) Organizational standards for local CSBG eligible entities; 2) Accountability measures for states and OCS; 3) Results Oriented Management and Accountability (ROMA) Next Generation; and 4) The CSBG Annual Report, which includes an updated and refined set of CSBG outcome measures. These elements are designed to increase accountability across all three levels of the network (Federal, State and local) and to enable program administrators at all levels to make better program decisions based on data.

*Ultimately, it is expected that this framework will help OCS and the CSBG Network to generate stronger results for people with low-incomes and communities served by the national network of states and eligible entities.* Reference [Information Memorandum 152 - CSBG Annual Report](#)

#### National Goals and Theory of Change

The CSBG Performance Management Framework is based on the [National Community Action Theory of Change](#). The Theory of Change provides an overview of the core principles, performance management framework, and services and strategies implemented and led by the network to achieve the goals of Community Action. Theory of Change provides clear connections among identified needs, populations served, outcomes that are realistic and possible, and how the services and strategies provided will do what they are supposed to do. Theory of Change describes Community Action's mission, vision and purpose, educates local or state legislators, and informs funders about the national framework.

Goal 1: Individuals and families with low incomes are stable and achieve economic security.

Goal 2: Communities where people with low incomes live are healthy and offer economic opportunity.

Goal 3: People with low incomes are engaged and active in building opportunities in communities.

### **Core Principles**

- Build local solutions specific to local needs
- Support family stability as a foundation for economic security
- Advocate for systematic change
- Pursue positive individual, family, and community level change
- Maximize involvement of people with low incomes
- Engage local community partners and citizens in solutions
- Leverage state, federal, and community resources

### **Measures--ROMA: Results Oriented Management and Accountability (Results)**

The Results Oriented Management and Accountability (ROMA) Performance Management Framework incorporates the [State Accountability Measures](#), [Federal Accountability Measures](#), [Organizational Standards](#), and the [CSBG Annual Report](#), of which ROMA is a component which requires eligible entities to integrate all the phases of the ROMA cycle into their agency management and administrative processes from conducting the needs assessment, doing agency wide strategic planning, implementing services and strategies, and reporting and analyzing data which is based upon the [National Community Action Network Theory of Change](#).

The ROMA system was initiated in 1994 by a task force of federal, state, and local CSBG Network officials through the Monitoring and Assessment Task Force (MATF). Based upon principles contained in the [Government](#)

Performance and Results Act of 1993, ROMA provides a framework for continuous growth and improvement among local CSBG-eligible entities. In 1998, the CSBG Reauthorization Act made ROMA implementation a requirement for receiving federal CSBG funds.

An important component of ROMA is the CSBG National Performance Indicators (NPIs), which creates a common set of measures to track the CSBG Network's performance with respect to services to low-income individuals, families, and communities. ROMA employs a cycle for implementation that includes community needs assessment; use of needs assessment data to identify service strategies and projected results; implementation of strategies and services; observation and report on progress; and analysis of data according to original benchmarks. The ROMA and NPI framework provides a foundation for targeting of resources based on outcomes and effectiveness of services. For more information on core activities of the State CSBG lead agencies and CSBG-eligible entities for the implementation of ROMA, see Information Memorandum 49 - Program Challenges, Responsibilities and Strategies.

As outlined in the CSBG Contract, "The Grantee shall submit the CSBG Annual Report on prior year services, in the format provided to the Grantee annually, no later than December 30th of the current contract year. Failure to submit the CSBG Annual Report shall result in program reimbursements being withheld until the report has been received. The Grantee shall meet performance benchmarks, as defined by the State and related to National Performance Indicators. Failure to meet the performance goals will require the Grantee to submit a corrective action plan to be incorporated within the Operational Plan and approved by the State. Continued failure to meet subsequent performance goals may result in a reduction of funding or termination of contract."

### **Organizational Standards (Capacity)**

Information Memorandum (IM) 138 - State Establishment of Organizational Standards for CSBG Eligible Entities, provides guidance and describes State and Federal roles and responsibilities for the establishment of organizational standards as a component of a larger performance management and accountability system for CSBG. Consistent with the authority and responsibilities of the CSBG Act establishes for the Federal office and States, OCS requires states to establish and report on their organizational standards for CSBG eligible entities as part of an enhanced system for accountability and performance management across the CSBG Network.

The Organizational Standards Center of Excellence (OSCOE) developed standards are organized in three thematic groups comprising nine categories and totals of 58 standards for private, nonprofit eligible entities and 50 standards for public entities.

1. Maximum Feasible Participation
  - Consumer Input and Involvement
  - Community Engagement
  - Community Assessment
2. Vision and Direction
  - Organizational Leadership
  - Board Governance
  - Strategic Planning
3. Operations and Accountability
  - Human Resource Management
  - Financial Operations and Oversight
  - Data and Analysis

All of the Organizational Standards Center of Excellence developed organizational standards work together to characterize an effective and healthy organization. Some of the standards have direct links to the CSBG Act, such as the standards on the tripartite board structure and the democratic selection process. Some standards link with U.S. Office of Management and Budget (OMB) guidance, such as the standards on audits. As a whole, the standards reflect many of the requirements of the CSBG Act, applicable Federal laws and regulations, good management practices, and the values of Community Action.

The purpose of the organizational standards is to ensure that all eligible entities have appropriate organizational capacity, not only in the critical financial and administrative areas important to all nonprofit and public human service agencies, but also in areas of unique importance for CSBG-funded eligible entities. To fulfill the promise of the standards, States must provide consistent and high-quality oversight and technical assistance related to organizational standards. In addition, based on information about organizational capacity, States must work with the eligible entities to make informed programmatic decisions about how the agencies can best meet the needs of local low-income families and communities.

As outlined in the CSBG Contract, the Contractor shall develop and implement a compliance plan in accordance with the CSBG Organizational Standards issued by the CSBG Organizational Standards Center of Excellence, set forth in [CSBG Information Memorandum \(IM\) 138](#) – State Establishment of Organizational Standards for CSBG Eligible Entities under 678B of the CSBG Act, 42 § 9914 published January 26, 2015. Grantee will implement the Organizational Standards which are applicable, depending on whether Grantee is private, nonprofit CSBG Eligible Entity or a public CSBG Eligible Entity, as set forth in Appendices 2 and 3 of IM No. 138.

### **Accountability Measures (Efficiency)**

In collaboration with the Community Services Block Grant (CSBG) Network, the Office of Community Services (OCS) developed State and Federal Accountability Measures to track organizational performance by State CSBG Lead Agencies and OCS. These measures are part of an enhanced framework for accountability and performance management across the CSBG Network.

**The State Accountability Measures** capture performance data about the critical activities and functions performed at the State level. They indicate *how efficiently and effectively* the State implements the activities described in the State plan, and *what impact* the State's efforts have on the performance of local eligible entities.

As outlined in IM 144, the State Accountability Measures address efficiency and effectiveness characteristics such as timeliness, accuracy, standards, and stakeholder satisfaction in the critical activities and functions listed below:

- Development of State plan, including involving the eligible entities
- Implementation of State plan including:
  - Distribution of funds
  - Use of remainder/discretionary funds
  - Grantee monitoring and corrective action
  - Data collection, analysis, and reporting
  - Organizational standards for eligible entities
  - State linkages and communication

**The Federal Accountability Measures** are tied to the critical roles and responsibilities of OCS, and, where applicable, align with the State measures. The Federal accountability measures indicate OCS's effectiveness and efficiency as well as the impact its efforts have on improving the performance of State CSBG Offices.

Like the State measures, the Federal measures address such efficiency and effectiveness characteristics as timeliness, accuracy, standards, and stakeholder satisfaction in the following critical activities:

- State plan review and acceptance
- Distribution of funds
- Grant monitoring and corrective action
- Data collection, analysis, and reporting
- Organizational standards
- Training and technical assistance
- Communications
- Grantee satisfaction



OCS requires States to collect, and report on, State CSBG Accountability Measures through their online State plan and annual reports. Concurrently, OCS will collect and report on Federal CSBG Accountability Measures.

#### Community Action Plan Based on Results Oriented Planning

Prior to determining the services to be provided, each agency must engage in a Results Oriented Planning Process. This requirement will be met by submitting the agency needs assessment and community plan prior to each new agency contract period. Needs assessments and community action plans will be due on the date as described by the State for the upcoming federal fiscal year (October 1 through September 30). This process enables the agency to develop a plan for meeting the multiple needs of the target population as required by the 1994 amendments to the Community Services Block Grant. Comprehensive Needs Assessment completed every three (3) years and updated annually. The Plan must include five areas:

- a community needs assessment
- a description of the service delivery system targeted to the low-income population
- a description of how linkages are to be developed to fill gaps in services
- a description of how funding under the CSBG Act will be coordinated with other resources
- a description of the service goal(s) and national performance indicators established to determine success.

Eligible Entities will submit an annual update of the community action plan, which will prioritize the community needs based on the entity's prior comprehensive community needs assessment. The work plan will address root causes of the identified needs, gaps in services available to address the need, existing community resources, proposed interventions, and strategies or programs to address the need. The work plan will also include the Results Oriented Management and Accountability (ROMA) national goals and performance indicators to be impacted by the interventions. Eligible entities will identify action steps for each proposed strategy, intervention, or program, identified in the work plan.

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

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

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

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

Annually, TDHS reviews and analyzes the data submitted through the CSBG Annual Report (CSBG AR) National Performance Indicators (NPIs). Agencies submit Quarterly Outcomes as outlined by the CSBG Annual Report, as well as individual and agency outcomes in the Center of Excellence Organization CSBG Assessment Tool, which incorporates five primary domains: Employment, Education, Income, Income Management, and Housing, as well as five secondary domains: Child Care, Health, Nutrition, Transportation, and Supports. In addition, throughout the year and for submission for the State Annual Report agencies submit success stories. These stories demonstrate individual, community, and agency successes.

**13.3. Eligible Entity Support:** Describe how the state supports the eligible entities in using ROMA or an alternative performance management system. **[Narrative, 5000 characters]**

**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.

TDHS will continue to revitalize its efforts to train and implement ROMA throughout the network. In cooperation with TACA, TDHS will mentor, train, and recertify Certified ROMA Trainers and Certified ROMA Implementers. TDHS partners with TACA to provide ROMA Training to all of the agencies across the state. Agencies are required per the CSBG Contract, at a minimum, to train all new staff within six months of hire. Training is offered throughout the state regionally at least once a year and as needed.

Throughout the year, ROMA professionals meet through the Outcome Advisors during TACA Quarterly Meetings and the TACA Annual Conference. In addition, TDHS staff has attended several conferences—National Association for State Community Service Programs, Community Action Partnership (CAP), Community Action Partnership Legal Services, Inc. (CAPLAW), Results Oriented Management and Accountability (ROMA) In-Service Continuing Education Program (ICEP) – to receive ongoing training for Community Services State Staff and CSBG-contracted agencies.

**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. **[Narrative, 5000 characters]**

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

At the beginning of each year, agencies are required to review and analyze their data through the CSBG Community Action Plan, the Organizational Standards, board governance, and the annual review of services and strategies provided the previous year. Agencies submit monthly and quarterly outcomes as outlined by the CSBG Annual

Report, as well as individual and agency outcomes incorporated into the CSBG Assessment Tool, which incorporates five primary domains: Employment, Education, Income, Income Management, and Housing, as well as five secondary domains: Child Care, Health, Nutrition, Transportation, and Supports.

In addition, throughout the year and for submission for the State Annual Report agencies submit success stories. These stories demonstrate individual, community, and agency successes.

At the end of the year, eligible entities will submit the CSBG Annual Report (CSBG AR) National Performance Indicators (NPIs) to TDHS and their local governing board.

TDHS plans to provide more training and technical assistance to help agencies with data analysis and reporting to make meaningful and decision on programs and services that connect to Community Needs Assessment, CSBG Annual Report/NPIs, and to understand the causes and conditions of poverty, identify gaps, and set targets.

### **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. **[Narrative, 5000 characters]**

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

In compliance with 676(b)(11) no agency is funded without submission of the CSBG Community Action Plan/Needs Assessment. Annually eligible entities submit their Community Action Plans as outlined through the CSBG Contracts.

- 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. **[Narrative, 5000 characters]**

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

In compliance with 676(b)(11), no agency is funded without submission of a Community Action Plan/Needs Assessment. As a part of their annual reporting of their Community Action Plans, TDHS requires agencies to report when their latest Community Needs Assessment was conducted, their findings, and how those findings impact their Community Action Plans.

The CSBG Needs Assessment provides current, reliable information about the population and the geographic area served by each agency. The Needs Assessment

includes basic information, such as:

- Geographic location (counties served, problems/obstacles to service provision in any given county, i.e., changing communities, lack of jobs or transportation)
- Demographic information about the customers to be served (estimated number of poor and vulnerable customers, general population estimate, racial/ethnic composition, and disabled)
- Needs description of customers to be served (educational level, unemployment rate, job market, housing standards/needs, crime rate, nutritional needs, substance abuse, single-parent household, etc.)
- Other agencies serving this population (services they provide, availability in all counties, accessibility, diversity among counties) such as community partners including community-based organizations, faith-based organizations, public sector partners, law enforcement, and educational institutions;
- Data analysis (summarized information collected for decision making) such as surveys, focus groups, interviews, and/or community forums;
- An analysis of the most recent U.S. Census Bureau data showing the incidence of poverty in the contract agency's service area and how poverty affects different demographic groups in the community.

The assessment relies heavily on baseline information in agency records and on customer board, and community surveys. Public meetings, United Way assessments, and other service provider assessments are utilized.

Due to unexpected events, including disasters and declarations of emergency states, additional needs for individuals, families, and communities, TDHS has developed a process for Community Action Agencies (CAAs) to submit an amended Community Needs Assessment at any time outside of the agency's scheduled timeframe in the event a new community need(s) has been identified in order to ensure unmet needs and gaps in services are addressed.

**SECTION 14**  
**CSBG Programmatic Assurances and Information Narrative**  
*(Section 676(b) of the CSBG Act)*

**14.1. Use of Funds Supporting Local Activities**

***CSBG Services***

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

- (A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals--
  - (i) to remove obstacles and solve problems that block the achievement of self- sufficiency (particularly for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
  - (ii) to secure and retain meaningful employment;
  - (iii) to attain an adequate education with particular attention toward improving literacy skills of the low-income families in the community, which may include family literacy initiatives;
  - (iv) to make better use of available income;
  - (v) to obtain and maintain adequate housing and a suitable living environment;
  - (vi) to obtain emergency assistance through loans, grants, or other means

- to meet immediate and urgent individual and family needs;
- (vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to –
  - (I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and
  - (II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

**[Narrative, 5000 characters]**

1) Funds made available through this 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—

The Tennessee Department of Human Services partners directly with CSBG funded agencies by assisting in the verification of client eligibility determination. This is accomplished via contractual agreements with the local eligible entities through which they are granted limited access to income verification for those individuals receiving Supplemental Nutrition Assistance Program (SNAP), Families First (TANF), or Medicaid assistance.

- (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);

To foster self-sufficiency, the primary services provided include case management and job training/education classes. Agencies have been encouraged to work with their local DHS office when both are serving Families First (TANF) clients. In these situations, agencies have been successful developing resources not covered by the Families First program. Some agencies have hired Families First participants.

- (ii) to secure and retain meaningful employment;

Under the Employment Service, some agencies have created Job Developer staff positions. The staff works with local businesses and agencies to develop career opportunities for their client population rather than merely placing them in vacant positions.

- (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;

Sub-recipient agencies that provide Education, Employment, and Self-Sufficiency Services work to improve literacy skills in the low-income families in their communities.

- (iv) to make better use of available income;

Under the income management service, some agencies are providing financial counseling to their clients either directly, with volunteers, or by paying a credit counseling agency if applicable. All of the agencies have been provided information about the “Your Money, Your Goals” financial literacy program provided through the Consumer Financial Protection Bureau. Several agencies are using this material as a training resource for their clients. Several agencies have been working with the IRS to help their clients retrieve the Earned Income Tax Credit.

- (v) to obtain and maintain adequate housing and a suitable living environment;

Under the Housing Service most agencies are completing “safety” repairs to homes that are identified during the Weatherization Program review. In this way the agencies are able to utilize much of the same staff and paperwork utilized in their companion program. Under the Income Management service, several agencies are using CSBG funds to support the Weatherization program.

- (vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent individual and family needs;

All twenty (20) agencies in 95 counties provide some level of emergency service. While all assist with eviction and utility shut-off notices, many also assist with medical emergencies and food needs. Most of these emergency needs are handled with agency funds while networking activities provide the remainder. Several of the

agencies also include a budget counseling program as a part of this services as a method to prevent further crisis situations. By screening the clients in this way, they are frequently able to identify additional client costs, develop a self-sufficiency plan and thereby prevent another crisis.

- (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; All agencies are required to select Community level goals based on their Needs Assessments. This determination is made at the local level.

### ***Needs of Youth***

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

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

**[Narrative, 5000 characters]**

All agencies are required, through their CSBG Community Action Plan, to describe how they are addressing the needs of youth. Agencies select goals based on their Needs Assessments. This determination is made at the local level.



### ***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)

**[Narrative, 5000 characters]**

Agencies are encouraged to partner with other external partners within their communities. All agencies are required to select goals based on their Needs Assessments. This determination is made at the local level. Local Family Assistance Staff are also encouraged to network with their local Community Action Agency.

### **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;”

**[Narrative, 5000 characters]**

Tennessee models its services according to the format provided by the Office of Community Services and the Monitoring and Assessment Task Force. Each agency provides services and strategies as outlined through the incorporation of the CSBG Annual Report and each of the three (3) National Goals. Services are provided to individuals at 125% of poverty and are provided service in all 95 counties of the state by the designated eligible entity in their community.

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

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

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

**[No response; links to 9.3b.]**

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

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

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

**[No response; links to 9.7]**

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

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

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

**[Narrative, 5000 characters]**

Through the application of ROMA principles and the two-generation whole family approach, agencies have been encouraged to be more innovative in their approaches to address service needs in their communities. TDHS has continued to encourage agencies to think more creatively in their service approaches.

In addition, TDHS in partnership with TACA has continued to foster the implementation of the two-generation whole family approach, through ongoing training at the TACA Annual Conference, and the 2Gen Whole Family Approach regional convenings. TDHS will foster the development and implementation initiatives through Human Capacity Community Transformation.

## **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.”

**[Narrative, 5000 characters]**

Most agencies across the state operate food pantries and emergency food and shelter services for safety net services to assist with community’s needs. Base on community needs, CSBG agencies will utilize CSBG funds to expand existing Emergency Food and Shelter funding or in cases of newly identified need will establish emergency food and nutrition services. TDHS and CSBG eligible entities will support efforts made to assist families working toward the prevention of uncontrollable circumstance and emergencies in the future.

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

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

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

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

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

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

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

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

## **Federal Investigations**

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

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

**[No response; links to 10.13]**

## **Funding Reduction or Termination**

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

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

**[No response; links to 10.7]**

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

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

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

**[No response; links to 9.6]**

## **Eligible Entity Tripartite Board Representation**

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

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

[No response; links to item 11.3]

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

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

[No response; links to items 13.5 and 13.6]

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

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

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

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

### **Validation for CSBG Eligible Entity Programmatic Narrative Sections**

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

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

[No response for this item]

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

## **SECTION 15**

### **Federal Certifications**

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

#### **15.1. Lobbying**

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

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

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was

placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

*Statement for Loan Guarantees and Loan Insurance*

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

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

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

## 15.2. Drug-Free Workplace Requirements

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

### 15.3. Debarment

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

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

##### Instructions for Certification

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

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

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

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

**Primary Covered Transactions**

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

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

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

Instructions for Certification

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

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

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

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

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

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

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

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