



Administration for Children and Families

Office of Community Services
Division of State Assistance

COMMUNITY SERVICES BLOCK GRANT (CSBG)

Preparing for Performance-Based Funding Decisions: What Can States Do Now?

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Major Topics

- **Who We Are** - *Responsibilities and Organization of OCS and Division of State Assistance*
- **Correcting Problems** - *Addressing Serious Deficiencies through the CSBG Process*
- **Building on the Strengths** – *Promoting Exemplary Practices and Preparing for new Federal and State Technical Assistance*
- **Getting Ready** - *Considerations for performance-oriented funding decisions*

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Who We Are

Responsibilities and Organization of OCS Division of State Assistance

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Office of Community Services Major Programs

- Low Income Home Energy Assistance Program (LIHEAP)
- Social Services Block Grant (SSBG)
- Community Services Block Grant (CSBG)
- CSBG Discretionary (CED, Rural, JOLI)
- Strengthening Communities Fund
- Assets for Independence
- Empowerment Zones and Enterprise Communities (EZ/EC)

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- Social Services Block Grant (SSBG)
- Community Services Block Grant (CSBG)
- CSBG Training and Technical Assistance (T/TA) Grants and Contracts
- Empowerment Zones and Enterprise Communities (EZ/EC)



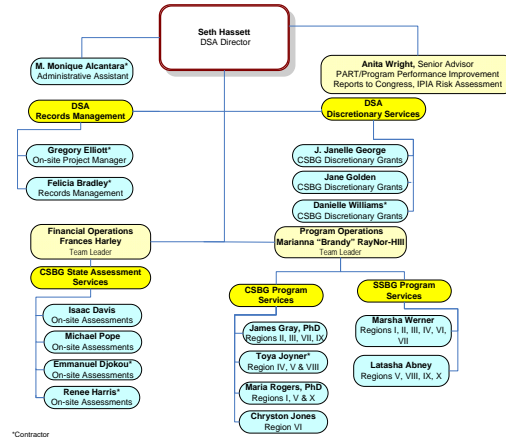
DSA CSBG Functions

- Review State CSBG Plans
- Training and Technical Assistance Grants
- Communications and Guidance
- Monitoring and Assessment
- Performance Measurement and Reporting



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Correcting Problems

*Addressing CSBG Entities
with Serious Deficiencies*



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Monitoring Infrastructure

Regular CSBG

Federal Monitoring

- Annual review of State CSBG Plans to assure compliance with statutory requirements
- Statutorily Required State Assessments
- Risk Assessment of States
- Ad Hoc Financial Monitoring – Review of Audit Results
- Review of State Corrective Action Plans
- Document Management – Records Retention

State Monitoring

- Annual review of eligible entity needs assessments and plans
- Statutorily Required Full Onsite Review of Eligible Entities – At least once every 3 years
- Onsite review of newly designated entities
- Follow-up reviews with eligible entities that fail to meet the goals, standards, and requirements established by the State
- Other reviews as appropriate.



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State Assessment Monitoring Schedule

FY 2011

- Kansas
- Pennsylvania
- Tennessee
- New Jersey

FY 2012

- Michigan
- Alabama
- Missouri
- New York
- Washington
- Wisconsin

FY 2013

- Colorado
- New Mexico
- Montana
- Rhode Island
- Connecticut
- Oklahoma

Tentative Dates

March, 2011
May, 2011
July, 2011
September, 2011

Tentative Dates

October, 2011
January, 2012
March, 2012
May, 2012
July, 2012
September, 2012

Tentative Dates

October, 2012
January, 2013
March, 2013
May, 2013
July, 2013
September, 2013



Monitoring and Assessment

- Model State Plan provided on CSBG website
<http://www.acf.hhs.gov/programs/ocs/csbg/>
- Information Memoranda (FY 2011) plans
- Plans received September 1, 2011
- OCS reviews and accepts if key statutory requirements addressed and plan is complete

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Monitoring Procedures & Tools – Regular CSBG

- Monthly Calls to States
- CSBG Monitoring Checklist (IM-102)
- State Assessments – Sample of States
 - o Desk
 - o On-site

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Note: Responsibility to Investigate Issues

- Review when funds are terminated for cause in related programs (e.g. Head Start, Low Income Home Energy Assistance Program (LIHEAP), and the Weatherization Assistance Program) to assure similar issues or concerns do not exist with CSBG funds
- Investigate any “whistleblower” allegations of fraud or abuse of CSBG funds and notify Federal authorities
- HHS Hotline: 1-800-447-8477



CSBG Information Memorandum 116 Corrective Action, Termination, or Reduction of Funding of CSBG-Eligible Entities

- Issued December 4, 2009
- Step-by-step description of necessary procedures for corrective actions, quality improvement plans, termination or reductions in funding for cause
- Emphasis on corrective actions and quality improvement
- No new deadlines or program requirements



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Key Points

- CSBG Act provides protections and responsibilities at Federal, State, and eligible entity levels
- Communication and documentation are critical at all stages of corrective action, quality improvement, and funding actions.
- CSBG Act procedures should be utilized in any instances of significant performance deficiency or risk.

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Cause for Changes to Proportional Share

- Statewide Redistribution of Funds – Changes due to census data, other appropriate data (e.g. poverty data), designation of new eligible entity, or severe economic dislocation – *CSBG Act, Section 676(c)(1)(A)*
- Failure to Comply with State Plan, Standard, or Requirement – *CSBG Act Section 676(c)(1)(B) and Section 676(c)(2)*

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10 Key Steps in Termination or Reduction for Performance-Related Cause

1. State review and monitoring
2. Determination of performance deficiency
3. Notification of performance deficiency
4. Communication of corrective action requirements
5. Technical assistance determination
6. Training & technical assistance offer (if appropriate)
7. Report on training and technical assistance offered
8. Quality improvement plan (if appropriate)
9. Opportunity for hearing
10. Initiation of proceedings to terminate or reduce funding

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Quality Improvement Plan

- State must consider seriousness of deficiency and time reasonably required to correct deficiency
- If Quality Improvement Plan warranted, State must allow entity to develop and implement plan within 60 days of being informed of deficiency
- Quality Improvement Plan should identify:
 - Actions that will be taken to correct deficiency;
 - State-approved timeframe for completion of actions.
- State must review and issue a decision on whether to approve a plan not later than 30 days after receiving plan and specify reasons if not approved.

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Opportunity for Hearing

- States must provide an opportunity for a hearing prior to terminating eligibility for CSBG funding or reducing proportionate share of CSBG funds.
- Hearing procedures should be consistent with applicable State policies, rules, or statutes.
- Subject to Federal review
- Suggested documentation includes:
 - Notice of hearing
 - Hearing official(s)
 - Names of participants
 - Documentation of evidence

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Opportunity for Federal Review

- A Federal review of decision to terminate or reduce funding may be requested within 30 days of notification of State decision.
- State may not discontinue present or future funding until Department of Health and Human Services (HHS) response.
- CSBG Act specifies that HHS must complete review within 90 days after receiving all necessary documentation for review.

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Award of Funds to a New Eligible Entity

- State may solicit applications and designate as an eligible entity either:
 - Private nonprofits geographically located in the unserved area;
 - Private nonprofits geographically contiguous or within reasonable proximity already providing related services in un-served area.
- If no qualified nonprofit identified, State may designate political subdivision (e.g. county).
- Tripartite board requirements must be met
- New award may not be issued until Federal review of decision to terminate for cause is completed or 90 days have passed since all documentation provided for Federal review.

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Additional Options to Protect Federal Funds

- Cost reimbursement with review of expenditures during a period of Quality Improvement Plan to mitigate substantial risks.
- Formal investigation and referral of allegations of waste, fraud, or abuse of funds.

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Building on Strengths

*Promoting Exemplary Practices and
Preparing for new Federal and State
Technical Assistance*



Training and Technical Assistance Projects

- CSBG Data
- CSBG Governance
- CSBG Legal
- Community Economic Development
- State Technical Assistance Capacity
- Exemplary Practice Identification and Dissemination
- Risk Assessment and Organizational Stabilization

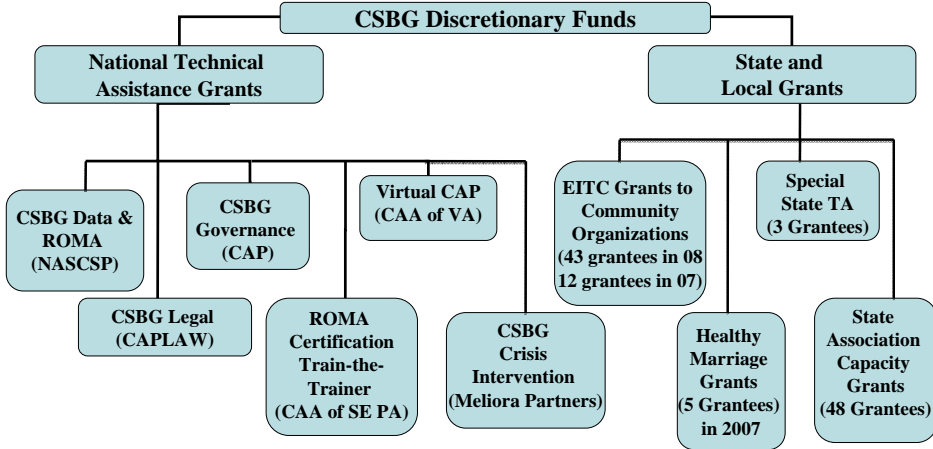


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Historic CSBG TA Infrastructure

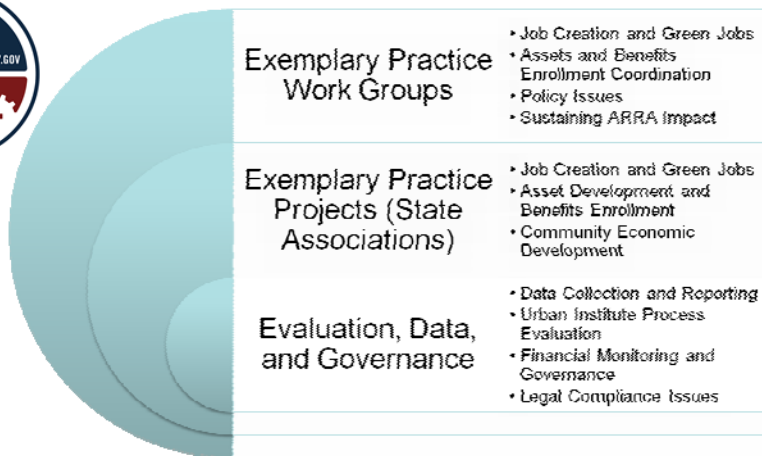
Fiscal Years 2005 - 2009



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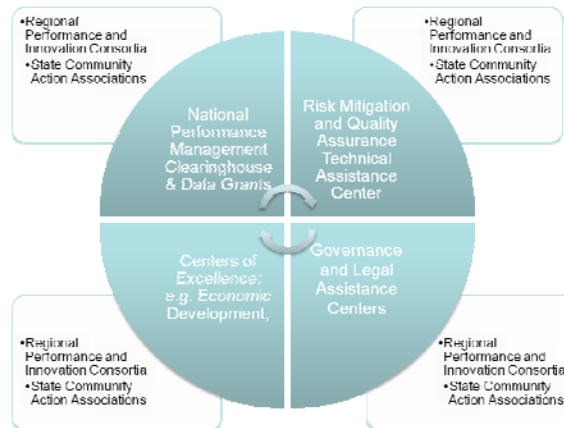
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Recovery Act T/TA Funds





Moving Forward - Regionally-Based CSBG Performance and Innovation Model



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Regional Performance and Innovation (RPIs) Consortia Forecast

Overview

10 awards to eligible non-profit organizations

- Support an enhanced nationwide T/TA strategy for coordination, collaboration and capacity-building of State Associations for the CSBG program.
- Promote and sustain relationships between State Associations and the corresponding State CSBG Lead Agencies; and
- Increase the capacity of State Associations to address the broad T/TA needs of CSBG-eligible entities.

Forecast **opportunities are subject to change** based on enactment of congressional appropriations.

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RPIs Consortia (Continued)

Strategy

- A lead grantee in each region will be selected competitively;
- Applications must include plan for sub-awards to support capacity for State Technical Assistance Activities; and
- Provide support for evidence-based or promising practices identified by national centers of excellence.

Forecast **opportunities are subject to change** based on enactment of congressional appropriations.

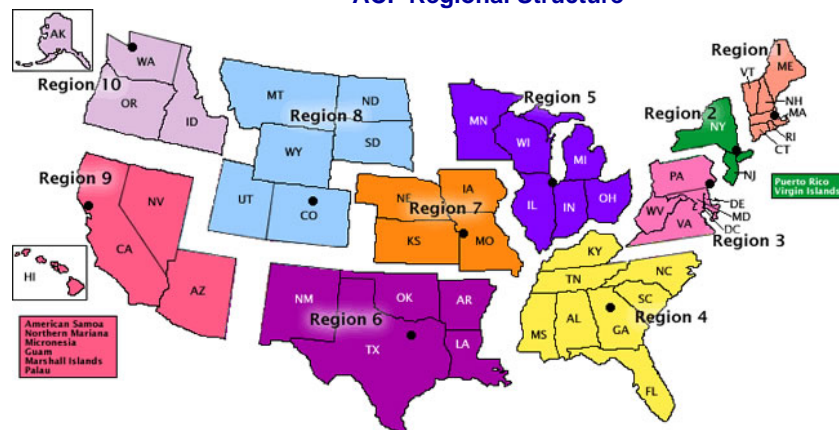
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Fiscal Year 2011 Forecasts Regional Performance and Innovation Consortia ACF Regional Structure



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National CSBG Leadership Development Center of Excellence - Forecast

Overview

- Create tools and technical assistance for State and local talent recruitment, leadership development, succession planning, and talent retention efforts.
- Leadership development focused on a wide range of skills needed for management of 21st Century anti-poverty efforts:
 - Public administration, strategic planning, financial management, human resource leadership, community relations, cultural competence, and performance evaluation.

Forecast **opportunities are subject to change** based on enactment of congressional appropriations.



National CSBG Leadership Development Center of Excellence (Continued)

Strategy

- One T/TA grantee to establish a National Center of Excellence focused on leadership development.
- T/TA is expected to coordinate with the Regional Performance and Innovation Consortia as well as other CSBG-funded T/TA providers.

Forecast **opportunities are subject to change** based on enactment of congressional appropriations.



Getting Ready

Considerations for Performance-Oriented Funding Decisions



Overall Goals of CSBG Reform

- Maintain CSBG emphasis on place-based services to address the causes and impacts of poverty
- Increase accountability for performance
- Direct resources to agencies that can most effectively service high need communities
- Maximize funding spent on services
- Promote evidence-based practice to achieve results
- Operate with high level of program integrity



Key Considerations

- Continued Corrective Actions with Agencies with Performance Deficiencies – Are Quality Improvement Plans in Place?
- Consideration of Differing Community Needs (e.g. Rural vs. Urban?, High Poverty Concentrations vs. Diffused Populations?)
- Reviewing Current Performance Systems - Could Financial, Administrative, and Program Data Currently be Used for Comparative Funding Decisions?