

Preparing for OCS Comprehensive State Assessment for CSBG

The Iowa Experience

NASCSP 2010 Fall Conference
Charleston, S.C.

Bill Brand
Division of Community Action Agencies
Iowa Department of Human Rights
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Document Request List for Community Services Block Grant (CSBG) - State

- CSBG Policy and Procedures Manual(s);
- CSBG Operations Manual;
- CSBG Lead Agency Organizational Chart;
- CSBG Staff Listing with Staff Titles;
- **Fiscal Management Policy and Procedures** - records documenting the State's administrative expenses, travel expenses for monitoring activities, general ledger activities, accounting procedures, and accounting software (if applicable);
- **Reporting Requirements for Eligible Entities** – evidence of State's requirement that entities establish and implement procedures for a tripartite board, conduct a needs assessment, submit a Community Action Plan (CAP), participate in the Results Oriented Management and Accountability (ROMA) system, form linkages with other programs, cooperate with Federal investigations, create effective service delivery systems, coordinate with other social service programs and provide for emergency food services;
- **CAP Review & Approval Procedures**- documentation describing the State's review process for Community Action Plans (CAPs) and criteria for approving the CAP of eligible entities;
- CAP – documentation of an eligible entity's CAP;
- **Quality Improvement Plans (QIPs)** – QIPs for eligible entities, (if applicable)
- **ROMA Data Verification** - documentation describing how the State verifies eligible entities' ROMA data submissions;
- **Monitoring Schedule & Procedures** - documentation of State's monitoring schedule of eligible entities for the last 3 years, newly-designated eligible entity reports, follow-up reviews, corrective action plans and results, and 262 reports;
- **Political Activities** - documentation of monitoring procedures to ensure that partisan political activity or any political activity associated with a candidate or in connection with an election is recognized as prohibited;
- **Information Memorandum (IM) #81** – documentation that guidance on voter registration activities is available to eligible entities;
- **Child Support Policies** – documentation of policies to guide eligible entities regarding child support issues;
- **Workforce Investment Act** – evidence of State agreement(s) with WIA, which determine to what extent cooperation and linkages are developed and nurtured;
- **Funds Limitations** – evidence of State's guidance to eligible entities on CSBG statutes regarding construction of facilities, political activities and nondiscrimination policies;
- **Designation and/or Re-designation Data** – documentation of eligible entities' change in designation status
- **Unresolved Negative Findings** – documentation of eligible entities given an opportunity for a hearing conducted within the State. Documentation of proceedings to terminate the designation of an eligible entity or to reduce and entity's funding
- **Training** - training schedule and/or examples of training offered to eligible entities (e.g. ROMA, board development, fiscal management, etc.); and
- **Innovation** – documentation describing how the State supported innovative community and neighborhood-based initiatives with discretionary funds.

Revised on 6/09/09

Document Request List for Community Services Block Grant (CSBG) – Eligible Entities

- Agency Organizational Chart;
- Agency and/or CSBG Annual Report;
- Agency and/or CSBG Program Brochures;
- CSBG Staff Listing with Staff Titles;
- CSBG Fiscal and Administration Policy and Procedures Manual(s);
- Personnel Files – CSBG job descriptions and evaluations, sample payments including FT/PT employees;
- Personnel Policies and Procedures – policies and procedures for hiring, evaluating, suspending, and terminating Executive Director;
- Board Charters;
- Board Meeting Minutes;
- Board Composition and Procedures – evidence of a tripartite board, including established procedures for low-income individuals to petition for adequate representation of low-income individuals on the board;
- Board Training – training schedule and/or examples of training offered to board members;
- Community Needs Assessment – copy of community needs assessments, including description of methodology (i.e. collection and analysis process);
- Agency Contract Agreement;
- Eligibility for Services – sample of case files to determine income eligibility.

Refer to Information Memorandum # 102 – CSBG Monitoring Checklist



DEPARTMENT OF HEALTH & HUMAN SERVICES

ADMINISTRATION FOR CHILDREN AND FAMILIES
370 L'Enfant Promenade, S.W.
Washington, D.C. 20447

RECEIVED

MAY 24 2010

COMMUNITY ACTION AGENCIES

MAY 19 2010

Mr. Bill Brand
Administrator
Bureau of Community Services
Lucaowa Department of Human Rights
Bureaus State Office Building
Des Moines, Iowa 50319

Dear Administrator Brand:

Each year, the Office of Community Services (OCS) conducts assessments of selected grantees under the Community Service Block Grant (CSBG) Program. This letter is a follow-up to preliminary discussions regarding the scheduling of an on-site assessment of the Iowa CSBG program and confirms our mutual understanding of the objectives, scope and methodology of the planned on-site assessment. As discussed, the State of Iowa's CSBG program assessment for the period of Fiscal Year 2007 with a financial emphasis on the grant period (October 1, 2006-September 30, 2007). The assessment is scheduled for the week of July 19, 2010 – July 23, 2010, and will begin with an entrance conference.

State assessments offer Federal staff an opportunity to assist State grantees in our collaborative efforts to operate CSBG programs effectively. The annual assessments also are responsive to the obligations set forth in the CSBG law requiring the evaluation of State programs to ensure that programs are operating in adherence to the statutory provisions.

Section 678B(c) of the CSBG statute (Public Law 105-285) states:

The Secretary shall conduct in several States in each fiscal year evaluations (including investigations) of the use of funds received by States under this subtitle, and especially with respect to compliance with program assurances.

Our specific objectives are to determine the extent to which:

- Iowa's oversight of the CSBG Programs complied with Federal laws;
- Iowa's use of administrative and discretionary funds complied with Federal laws and regulations; and
- The funds provided contributed to the goals of the CSBG Programs.

Additional information about the scope and methodology of the assessment can be found at Enclosure 1.

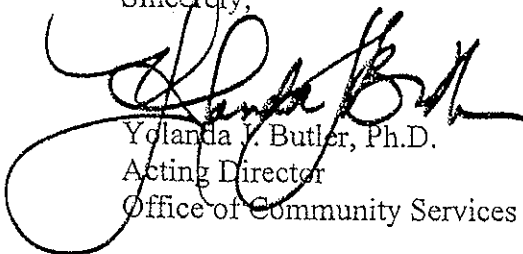
As indicated in previous correspondence, your staff can facilitate organizing and conducting the assessment of the CSBG program by providing information and pertinent documents you have available which describe your program prior to our on-site review. Also, in the absence of specific Federal requirements, your State rules and procedures govern the use of funds within the context of the statute. As such, our assessment will rely heavily upon consideration of the States definitions of obligation, administrative costs, etc. Your submission should include materials explaining State rules and procedures. To allow us to understand the monitoring efforts of your entities and to avoid duplication, please provide the following:

- Monitoring guidelines, procedures and forms for State and local agency operations;
- Monitoring time schedules;
- Procedures for monitoring local agencies;
- Targeted management studies;
- Corrective action memoranda;
- Revised program procedures based on monitoring findings;
- Program evaluations; and
- Audit and monitoring reports with resolution reports on financial matters.

Please submit the general background information regarding your program (e.g., documents on program management operations, administrative operations and fiscal and financial operations) and the specific information requested above, if available, on or before **June 18, 2010**. **Electronic submission of materials is acceptable**. While we do not expect the State to prepare an elaborate formal submission, we encourage you to submit material that addresses the scope of this assessment to facilitate the review process. Documentation previously provided to OCS need not be resubmitted, and we are not requesting that you provide any information that is not readily available.

If you have any questions, please contact Frances Harley, Financial Operations, at (202) 401-6888 or by email at Frances.Harley@acf.hhs.gov. Thank you for your assistance and cooperation.

Sincerely,



Yolanda J. Butler, Ph.D.
Acting Director
Office of Community Services

Enclosure 1

Enclosure 1

SCOPE AND METHODOLOGY

SCOPE

OCS will utilize Federal statutes, regulations and guidance for the standards to measure Iowa's CSBG Program.

METHODOLOGY

OCS will review Iowa's oversight of the CSBG Program and compliance with Federal laws through conducting personal interviews with the staff of the State Community Service Office. We will also review State policies, plans and procedures that the Iowa OCS staff provide to determine whether the State's monitoring procedures provide reasonable assurance that applicable Federal and State laws and standards are being followed. The review team will also conduct interviews with at least four eligible entities located in the State of Iowa.

OCS will then review the use of administrative and discretionary funds. We will interview the staff to determine if the agency was following applicable State and Federal guidance.

We will also conduct personal interviews with the staff of several local agencies to determine if those agencies are following applicable State and Federal guidance.

Finally, to determine whether the CSBG funds expended by the State contribute to the goals of the CSBG Program, we will examine State and agency records and conduct personal interviews to review and verify the Results Orient Management outcomes document by the State's community action agencies.

Iowa Department of Human Rights, Division of Community Action Agencies

- Grant Agreement between the State and the Department of Human Rights, Division of Community Action Agencies.
- FY2007 Roma report sent to NASCSP*
- FY2006-2007 Financial Status Report*
- Accounting/Financial Policy and Procedures*
- Personnel Policies (specifically on payroll, timekeeping, state holidays, performance, etc...)
- OMB A-87 Indirect Cost Plan/Allocation
- Training – training schedule and/or example of training offered to eligible entities such as ROMA, board development, fiscal management, etc. as it relates to FY2007.
- FY2007 CSBG General Ledger Detail Reports*

The information listed below is required from all eligible entities when we arrive on-site. The state must submit information for North Iowa Community Action Organization, South Central Iowa Community Action Program, and City of Des Moines/Community Development to OCS by C.O.B Thursday, July 8, 2010

- Agency Organizational Chart
- Agency and/or CSBG Program Brochures
- CSBG Staff Listing with Staff Titles
- Personnel Files – CSBG job descriptions and evaluations, sample payments including FT/PT employees
- Personnel Policies and Procedures – policies and procedures for hiring, evaluating, suspending, and terminating Executive Director
- Board Charters
- Board Meeting Minutes
- Board Composition and Procedures – evidence of a tripartite board, including established procedures for low-income individuals to petition for adequate representation of low-income individuals on the board
- Board Training – training schedule and/or examples of training offered to board members
- Community Needs Assessment – copy of community needs assessments, including description of methodology (i.e. collection and analysis process)
- Agency Contract Agreement
- Eligibility for Services – sample of case files to determine income eligibility

* Information needed prior to our visit

Strategies in Preparation for OCS Comprehensive State Assessment Visit for CSBG

NASCSP 2010 Fall Conference

- 1- **Review IM 102**

- 2- **Update or develop your CSBG Policies and Procedures Manual.** Examples on NASCSP site. At a minimum, ensure everything is written somewhere and have copies available.

- 3- **Review documents previously provided by OCS**

- 4- **If you didn't have it then, have it now**

- 5- **Communicate, Communicate, Communicate-** With OCS, with local agencies, with your staff, including fiscal.

- 6- **Use NASCSP!**

The value is in the preparation, the reward is a stronger CSBG program

Contact:
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