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INTRODUCTION

As administered by the State of Georgia Department of Human Services, Division of Family and Children Services, the Community Services Block Grant (CSBG) program provides funding to alleviate the causes and conditions of poverty within the community.

The State of Georgia Department of Human Services, Division of Family and Children Services, hereafter referred to as the State Department, CSBG funding supports projects that lessen poverty in communities, address the needs of low-income individuals including the homeless and the elderly and provide services and activities addressing employment, education, better use of available income, housing, nutrition, emergency services and health.

With the support of CSBG funding, eligible entities work together to achieve increased self-sufficiency, improved living conditions, ownership and pride in the communities served and stronger family and support systems goals for low-income individuals.

Authorization


Background

The Official Code of Georgia Annotated, 49-8-4 (O.C.G.A) designates the Department of Human Services, as the lead state agency for the administration of the Community Services Block Grant.

The Community Services Block Grant (CSBG) is administered through a contractual agreement with a statewide network of twenty (20) non-profit community action agencies and four (4) county governments designated as eligible entities. Services and programs are provided to all one hundred fifty-nine (159) counties.
101.3 Requirement

The State Department must comply with federal statutes and regulations in administering the Community Services Block Grant program through Community Action Agencies and county governments (hereafter referred to as eligible entities).

The eligible entities must comply with all policies and procedures found in the CSBG Manual and the State Department contract.

101.4 Basic Consideration

The purpose of the Community Services Block Grant funds is to allow states to provide a wide range of services to help ameliorate the causes and conditions of poverty. Funds are distributed to all twenty-four (24) eligible entities based on a formula adopted by the State Department and a committee of representatives from eligible entities. Assistance is provided for individuals at one hundred and twenty-five percent (125)% of the Federal Poverty Guidelines.

Eligible entities must submit a Project Application Plan at least annually, prior to the beginning of the grant program. Programs or services administered by each entity must be used to support activities and services designed to assist low-income families and individuals to become self-sufficient. Each eligible entity will conduct a Needs Assessment in their service delivery area to determine the needs of the community. Programs administered by the local agencies should be guided by the results of the Needs Assessment.

101.5 ROMA and National Goals

Results Oriented Management and Accountability, or ROMA, is a set of principles designed to preserve the anti-poverty focus of community action and to promote greater effectiveness among state and local agencies receiving CSBG funds. Programs or services administered must address at least one (1) of the six (6) national goals and each program administered should have measurable results.

ROMA was created in 1994 by an ongoing task force of Federal, state, and local community action officials – 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 more than 1000 local community action agencies and a basis for state leadership and assistance toward those ends.
Since 1994, the Community Services Network has been guided by six broad anti-poverty goals established by the MATF:

**Goal 1:** Low-income people become more self-sufficient.

**Goal 2:** The conditions in which low-income people live are improved.

**Goal 3:** Low-income people own a stake in their community.

**Goal 4:** Partnerships among supporters and providers of service to low-income people are achieved.

**Goal 5:** Agencies increase their capacity to achieve results.

**Goal 6:** Low-income people, especially vulnerable populations, achieve their potential by strengthening family and other supportive systems.

To accomplish these goals, local community action agencies have been encouraged to undertake a number of ROMA implementation actions that focus on results-oriented management and results-oriented accountability:

**Results-Oriented Management**

- Assess poverty needs and conditions within the community;
- Define a clear agency anti-poverty mission for community action and a strategy to address those needs, both immediate and longer term, in the context of existing resources and opportunities in the community;
- Identify specific improvements, or results, to be achieved among low-income people and the community; and
- Organize and implement programs, services, and activities, such as advocacy, within the agency and among “partnering” organizations, to achieve anticipated results.

**Results-Oriented Accountability**

- Develop and implement strategies to measure and record improvements in the condition of low-income people and the communities in which they live that result from community action intervention;
- Use information about outcomes, or results, among agency tripartite boards and staff to determine the overall effectiveness, inform annual and long-range planning, support agency advocacy, funding, and community partnership activities.

(See NASCSP website for Instructions on completing Outcome Measures www.nascsp.org).
101.6 National Performance Indicators

The National Performance Indicators (NPIs) collect data on ALL of the agency's activities (not just CSBG-funded activities). The NPIs require eligible entities to think about the context in which the agency is providing services in order to determine where various outcomes should be reported. Eligible entities should evaluate programs or services to identify whether or not the service is providing the intended outcome and may be used to measure program effectiveness.

101.7 CSBG Service Activities

The State Department currently offers fourteen (14) programs and accompanying services that local agencies may choose from based on the needs of their respective communities:

SELF-SUFFICIENCY

Activities or services in this category may include long term comprehensive supports or short term temporary assistance that removes barriers and promotes progress toward self-sufficiency such as:

- Written case management plans that outline specific goals with benchmarks to move families from vulnerable to stable
- Financial assistance with required receipts and/or State provided Affidavit, to include:
  - Third party or direct payments to vendors
  - Stipends
  - Gift cards for gas, food or clothing goods
- Employment supports such as career counseling, free clothing

EMPLOYMENT

Activities/services in this category assist with securing and maintaining employment and may include:

- Job counseling, skill assessments, job placement, career development, resume preparation
- Referrals to training, educational assistance, subsidized childcare
- Provision of transportation vouchers

ECONOMIC DEVELOPMENT

Services under this category should be used 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:

- Document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication and;
- Strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts
EDUCATION
Activities/services in this category are designed to assist low-income participants in attaining an adequate education. Examples of services are:

- Counseling and mentoring for at-risk students
- Scholarships for college or technical school
- Adult basic education with flexible schedules
- Providing funds for educational testing
- Computer based courses to train participants for the contemporary workplace

INCOME MANAGEMENT
Activities/services in this category are conducted for the purpose of assisting low-income families with effectively managing and using their available resources. Examples include:

- Conducting financial literacy workshops
- Assisting with receiving benefits such as SSI and EIC (earned income credit)
- Assisting with establishing banking services

HOUSING ASSISTANCE
Services/activities in this category are designed to assist low-income participants to obtain and maintain adequate housing and a suitable living environment. Examples are:

- Provision of assistance with home repair and rehabilitation, with approval from the State Department
- Provision of homeownership and mortgage counseling
- Provision of rental or mortgage assistance to prevent eviction

NUTRITION
Services/activities in this category are designed to assist low-income participants maintain adequate nutrition. Examples include:

- Special feeding activities such as home delivered meals, conjugate meals
- Pantry vouchers
- Referrals to State nutrition programs
- Financial assistance
HEALTH
Activities/services in this category are designed to ensure access to primary health care services, including both mental and physical health. Examples are:
  • Provision of prescription assistance vouchers
  • Partnering with physicians and pharmaceutical companies
  • Sponsoring health fairs

EMERGENCY ASSISTANCE
Activities/services in this category provide emergency assistance through loans or grants to meet immediate and urgent individual and family needs, including the need for health services, nutritious food, housing, utilities and employment related services. Examples include:
  • Provision of emergency financial assistance
  • Crisis intervention in emergencies such as making referrals to battered women shelters
  • Provision of disaster relief
  • Provision of clothing, personal care items and furniture

ENERGY ASSISTANCE (NON-LIHEAP)
Activities/services in this category assist families and individuals in meeting emergency energy assistance needs including home energy conservation and relief with high utility bills. Examples include:
  • Energy conservation counseling
  • Provision of utility bill assistance
  • Households receive energy auditing

YOUTH AND FAMILY DEVELOPMENT
Activities/services in this category address the needs of youth in low-income communities through youth development programs that support the primary role of the family. Examples include:
  • Provision of before and after school child care services
  • Sponsoring students in summer recreational programs
  • Provision of internship programs

RESIDENT PARTICIPATION
Activities/services in this category involve individuals in the development of and participation in meaningful programs or activities designed to improve the communities in which they live. Examples include:
  • Individuals participate in neighborhood service centers
  • Individuals participate in town hall meetings
• Individuals participate in eligible entity Board meetings

**LINKAGES**
The purpose of this category is to coordinate and establish linkages between individuals and social service programs to assure the effective delivery of such services to the low-income customer. Examples include:

• Eligible entity staff participate in case conferences with other service providers
• Eligible entity staff participate in inter-agency councils
• Eligible entity partnering with other agencies to provide expanded services

**OTHER NEGOTIATED SERVICES**
Activities/services in this category are expected to be a rare exception. Eligible entities should obtain prior approval from the State Department before submitting the Project Application Plan utilizing this as a service activity.

101.8 **Forms**
All pertinent forms will be distributed to agencies via email as an addendum.

101.9 **Federal Websites**
The following websites are tools to assist eligible entities in administering the CSBG Program:

Administration for Children and Families Office of Community Services – www.acf.hhs.gov
National Association for State Community Services Programs – www.nascsp.org/csbg
National Community Action Foundation – www.ncaf.org
201 BOARD GOVERNANCE OVERVIEW

The Boards of Directors plays a unique and important role in the life of a Community Action Agency. While staff members transition, founding directors retire, and programs change, the board offers consistency in purpose, intent, and responsibility. The governing board acts as a body, not as individuals, and its members are bound by the Duties of Care, Loyalty, and Obedience, bearing legal liability for their individual actions as well as those of the corporation. Governing boards that are functional and active are important for all eligible entities.

201.1 Requirement

Federal legislation requires the establishment of a tripartite board. Sections 676B of the Community Services Block Grant Reauthorization Act of 1998 requires that, as a condition of designation, private nonprofit entities and public organization administer their CSBG program through boards that fully participate in the development, planning, implementation and evaluation of the programs serving low-income communities.

201.2 Board Composition for Community Action Agencies

The Community Services Block Grant Law [Sec 676B(a)(2)] requires that each Community Action Agency or other private non-profit organization have a Board that is constituted as follows:

- One-third (1/3) of the members of the board are elected public officials, holding office on the date of selection, or their representatives, except that if the number of such elected officials reasonably available and willing to serve on the board is less than one-third (1/3) of the membership of the board, membership on the board of appointive public officials or their representatives may be counted in meeting such one-third requirement.
- Not fewer than one-third (1/3) of the members are persons chosen in accordance with democratic selection procedures adequate to assure that these members are representative of low-income individuals and families in the neighborhood served; and each representative of low-income individuals and families selected to represent a specific neighborhood within a community resides in the neighborhood represented by the member.
- The remaining members of the board are officials or members of business, industry, labor, religious, law enforcement, education, or other major groups and interests in the community served.

201.3 Board Composition for Public Organizations
The Community Services Block Grant Law [Sec 676B(a)(2)] requires that public organizations, such as county governments, utilize State-specified mechanisms other than tripartite boards to administer the CSBG program. Each public organization must have an advisory board that is constituted as follows:

- Not fewer than one-third (1/3) of the members are persons chosen in accordance with democratic selection procedures adequate to assure that these members are representative of low-income individuals and families in the neighborhood served; and
- each representative of low-income individuals and families selected to represent a specific neighborhood within a community resides in the neighborhood represented by the member.
- low-income individuals must actively participate in the development, planning, implementation and evaluation of funded programs.

### 201.4 Board Requirements

Each eligible entity must maintain on file a complete listing of their governing board members (or advisory board) and make such lists available to the State Department.

The roster at least must list the following for each board member:

- name
- address
- home phone number
- occupation
- service term
- gender
- membership category of each board member
- number of vacancies in each category

Each eligible entity must notify the State Department in writing of changes in the Board Chair leadership and/or changes in board composition. Notification of board changes must be sent to the CSBG Unit Director and Project Administrator.

Each eligible entity must make available for review and/or copy:

- board minutes
- activities
- functions
- meetings
• attendance records,
• board membership rosters and
• any other relevant documents available for review and/or copy

Notification letters of matters needing corrective action will be sent to Board Chair and Executive Director.

201.5 Board Membership Petition

Each eligible entity is required to establish a procedure for low-income individuals, community organizations and religious organizations to petition for adequate representation on the board if such individual or organization considers itself to be inadequately represented.

201.6 Board Responsibilities

The Board of Directors for any 501(c)3 nonprofit agency has fiduciary responsibility for the overall operation of the agency. CSBG eligible entities must have a tripartite governing board that fully participates in the development, planning, implementation, and evaluation of the program to serve low-income communities.

The governing boards of private non-profit Community Action Agencies (and where applicable advisory boards) are required to approve the following at a minimum:

• The CSBG Project Application Plan that describes the programs/services and expenditures for the fiscal year.
• The purchase of any equipment costing $5,000 or more, after the annual proposal has been approved.
• Contract amendments during the contract period.
• Subcontracts in amounts of $5,000 or more, except for audit services, janitorial services, and maintenance or pest control.
• Any budget revisions exceeding fifteen percent (15%) of a line item.
• Personnel Policies and Procedures for CSBG personnel changes.

Board approval for any of the above items must be confirmed in the minutes of the Board’s meetings.

201.7 Advisory Board Responsibilities

CSBG eligible entities that are public organizations, such as county or local governments, must have an advisory board that fully participates in development, planning, implementation and evaluation of the program.

• The advisory board may or may not be the county commission.
• Appointed advisory boards make recommendations to the administering agent (i.e., county government, designated agency or individual).
• The administering agency is responsible for approval of all aspects of CSBG program administration.

201.8 Board Training

Board training is an important activity for the governing and advisory board. Training helps in to set standards against which the Board can evaluate its own performance. It will increase the understanding of appropriate execution of board roles and responsibilities and it is an effective tool in facilitating skill development for boards to perform their roles and responsibilities.

Training should cover at a minimum the areas of planning, fiscal oversight, community partnerships, program evaluation, and human resources.

The State Department supports board training by providing funds to the Georgia Community Action Association. State Department staff will assist in facilitating board training if requested by the agency executive director and Board Chair.
301 COMMUNITY NEEDS ASSESSMENT OVERVIEW

The Community Needs Assessment offers a focus on local conditions, analyzing the economic opportunities and barriers for all residents who are at risk of remaining or becoming economically insecure. It identifies existing and potential resources to expand opportunities. It prepares leadership of the eligible entity to plan a multi-year strategy. All CSBG eligible entities are expected to choose strategic goals and follow a clear plan to achieve desired results. It is essential to explain how the priorities in an agency's strategic plan meet the proven needs in the community.

301.1 Requirement

To comply with the Community Service Block Grant (CSBG) Act, Public Law 105-285, 42 U.S.C. 9908 (a)(11), CSBG eligible entities must complete a Community Needs Assessment. The State Department is required to secure from each eligible entity, as a condition of funding, a Plan that includes a needs assessment for the communities served. Each eligible entity is required to submit a current comprehensive Needs Assessment annually with the Project Application Plan (PAP) in order to be in compliance with the fiscal and administrative requirements of the CSBG program.

A Needs Assessment is a systematic process of obtaining and analyzing information to determine the current status and service needs of a community. The process used must be flexible enough to respond to the continually changing socioeconomic and demographic environments.

A decision must be made to determine who will conduct the Assessment; what information will be collected; what methodology will be used to collect the information and how the information will be used.

301.2 Basic Considerations

A Needs Assessment:

- Must be conducted every three (3) years for the specific community that is served by the contracted agency.
- Must be submitted to the State Department with the Project Application Plan.
- An assessment summary that outlines current needs, new or projected needs, and unmet needs should also accompany the Plan.
- May be coordinated with needs assessments conducted for other programs within the agency
- May focus on a specific program or target population in some instances.

301.3 Units of Needs Assessments
After the data is collected, thoroughly examined and interpreted, the results should be used as a starting point for establishing priority of services and planning of resources. In addition to the level of priority of need, the information can assist eligible entities to:

- Manage programs more effectively
- Refine or eliminate existing programs
- Prevent duplication of programs
- Provide justification to the board and others for decisions and actions
- Provide broader support and acceptance by sponsors and employees
- Determine the need for training and professional development

### 301.4 Components of a Community Needs Assessment

At a minimum, the following items should be included as components of an Assessment:

- Demographic make-up of eligible families including their number, geographic location, and racial/ethnic composition
- Other social service agencies in the geographic area and the constituents they serve
- Data regarding the health, nutrition, and social service needs of the communities as defined by community institutions
- Availability and accessibility of community resources that can address the needs of eligible families
- An analysis of the data collected to document a need for the proposed service(s) to use CBSG funds

### 301.5 Guidance on Completing a Community Needs Assessment

**Step 1: Designate a Coordinator**

Designate one staff person to be the CSBG Community Needs Assessment Coordinator who will oversee activities associated with the completion of the assessment. The Coordinator’s responsibilities may include overseeing the development of a methodology, the administration of surveys, the conduct of hearings or focus groups, the analysis of the results and the completion of the Community Needs Assessment Report.

**Step 2: Determine Assessment Methodology**

Determine the methodologies which will be used to gather information on the critical community needs in each county of the CSBG service area. Maintain documents which describe each methodology utilized. Also identify the population or neighborhoods to be surveyed and how they will be surveyed. Identify when, where, and how public hearings will be held and describe how the focus groups will be conducted and how participants will be sought. Lastly, identify the research to be conducted to determine the needs in each county in the service area, and identify the sources for data to be utilized. Data should be gathered on: unemployment rates; education;
levels, literacy rates; teen pregnancy; crime rates; number of persons in poverty; health data; affordable housing data; and other key issues impacting low-income persons in the CSBG service area.

**Step 3: Develop a Plan of Action**

Eligible entities are encouraged to develop a Plan of Action for each county in the CSBG service area which describes how the Community Needs Assessment will be conducted. Provide the following information:

- The method to be used (survey, public hearings, focus groups, research, etc.) to determine the needs in your service area.
- Describe how outreach will be conducted to notify communities of the Community Needs Assessment. (i.e., newspaper articles, radio bulletins, fliers, postings at public buildings, postings at neighborhood centers, etc.)

**Step 4: Develop a Timetable**

Develop a timetable for conducting the CSBG Community Needs Assessment(s) **for each county** in your service area. Your Needs Assessment may be submitted as one document covering multiple counties. We encourage all eligible entities to complete new/renewal Needs Assessments at the end of the calendar year thereby enabling eligible entities to use the assessment results when preparing the Project Action Plan (PAP) and proposed activities and services for the next funding cycle before the submission of the next PAP plan, typically done in the beginning of each year.

**Step 5: Develop Assessment Tools**

Develop the documents and instruments to be used to conduct the Community Needs Assessment. For public hearings, develop the public hearing schedule, includes dates, times and locations and the press releases or other documents to be used to publicize hearings. Also develop all material to be used during the public hearings. For surveys, develop the survey instrument. Local universities or community colleges may have students that may be able to offer assistance in developing survey instruments and in conducting surveys or focus groups. For focus groups, it is recommended that the group be limited to no more than 15 to 25 persons.

**Step 6: Conduct Research**

Conduct research on the needs in your service area, by county. Data can be gathered from newspaper articles, journals, magazines, interviews with knowledgeable sources, web sites, etc. Document key findings from the research in a narrative form. For each county in the CSBG service area provide, **at a minimum**, the following information and statistics:
1. Availability versus demand for affordable low-income housing: contact local housing authorities, visit the HUD Research webpage.

2. County unemployment rate: contact the Georgia Department of Labor and review statistics available on the websites along with U.S. Census Bureau data.

3. Community literacy rate: contact local school board(s) and/or local school districts and review statistics available.

4. High school drop-out rate: contact local school board(s) and/or local school districts and review statistics available.

5. Crime rate: contact administrative office(s) of County Sheriff Department or the crime statistics from the Georgia Bureau of Investigation.

6. Percentage of persons living in poverty: visit the U.S. Census Bureau or the Georgia State Data Center web sites.

7. Provide any other relevant information about your service area.

### Step 7: Summarize & Analyze

Results Summarize and analyze the results of surveys, hearings, focus groups, interviews, etc. In summarizing and developing the Community Needs Assessment Report, provide a summary on the results for each type of methodology utilized in each county.

If **surveys** were used, **at a minimum**, include the following:

- Number of surveys distributed;
- Number of surveys returned;
- Methods for distribution of surveys;
- Names of counties surveyed;
- Names of persons or organizations that assisted in conducting the survey;
- Blank copy of the survey instruments (do not submit completed surveys).
- A summary of the survey analysis per county.

If **public hearings** were held, **at a minimum**, include the following:

- A Transcript of the hearings.
- Location of each public hearing;
- Time and date for each public hearing;
- Names of persons(s) in your organization that conducted each public hearing;
- Method used to publicize the public hearings;
• Attendance roster with the name of persons attending each public hearing;
• Number of persons giving testimony at each public hearing; and
• A summary of comments submitted.

If focus groups were held, at a minimum, include the following:

• Location of each focus group;
• Time and date for each focus group;
• Names of persons(s) in your organization that conducted each focus group;
• Method used to publicize the focus group;
• Sign-in sheet with the name of persons participating in each focus group;
• Minutes of the focus groups; and
• A summary of the input received.

Pre-existing data can be obtained by researching public records and reports. This data is collected about a particular group without the agency having direct contact with that group. This information can provide insight about emerging trends or issues in a particular community.

• This data already exists
• It is fast and easy to access
• Data is available for many geographic areas

For research conducted, identify the following: data sources, names of web sites, names of articles or any other source of information utilized in the data analysis. Include a narrative describing the results of the research.

The websites listed below are examples of potential resources for gathering data for numerous programs:

• The University of Georgia (Housing and Consumer Economics) – www.fcs.usa.edu/hace/hdrc
• The United States Census Bureau – www.census.gov
• The Georgia Department of Labor – www.dol.state.ga.us
• DFCS Data Analysis and Reporting Section – www.dfcsdata.dhr.state.ga.us
• Community Commons

Step 8: Complete the Community Needs Assessment Report

In addition to including information outlined in Step 7, the final Community Needs Assessment Report should include the following information, by county, based on the research and survey results:
1. Identification and description of the critical community needs.
2. Identification of contributing factors which may be causing or impacting the needs.
3. Information on the services available in the county in the areas of: employment, education, housing, health, substance abuse prevention, transportation, budgeting, literacy, etc. which address the identified community needs.
4. Description of existing gaps in services, i.e. unmet needs versus services available.
5. Explanation on how the needs identified in the Community Needs Assessment will change the CSBG Services and Activities planned for three years, including specific services or activities that will be implemented and whether any activities will be discontinued. Include the reasoning behind any changes that may be anticipated due to the results found in the needs assessment.

The report must include a table of contents and page numbering, the name and the title of the CSBG Community Needs Assessment Coordinator, the name(s), title(s), telephone number(s) and extension(s) of the primary staff person(s) involved in preparing the CSBG Community Needs Assessment.
401 PROJECT APPLICATION PLAN OVERVIEW

All eligible entities are required to submit a Project Application Plan (PAP) that links all services to the National Goals. The PAP is the framework in which eligible entities address the problem of poverty situations in their community as identified in the current needs assessment. All PAPs are to be completed utilizing EasyTrak.

401.1 Requirement

Programs offered should be directly related to the mission statement of the agency.

Eligible entities must develop a PAP that outlines each of the services provided by the CSBG program. The PAP includes but is not limited to:

**Title of Program/Service** – The title name given to the program is chosen by the agency. Generally, the title name of the program reflects some aspect of the program category.

**Contract Period** – The contract period lists the beginning and end dates of the period covered by the plan. Most often the contract covers the 12 months of the federal fiscal year; however certain programs within the agency may not, i.e. youth summer camp programs. Additionally, the contract period for plans supported by discretionary funding may have different start and end dates.

**Program Category** – The program category best reflects the primary tenets of the program and is selected from the thirteen (13) CSBG statute service categories or “Other Negotiated Services”. Although “Other Negotiated Services” is rarely used, it was designed by the State Department to capture any program that does not fall into one of the thirteen CSBG service categories. Programs that fall into Other Negotiated Services must seek prior approval from the State Department prior to the submission of the PAP.

**Determination of Need** – This shows the degree of need for the program as identified in the current needs assessment. Multiple resources should be used to make the determination of need.

**Individuals to be Served Directly** – The number of units expected to be served is determined by the type of services provided, target population, contract period, program cost per unit, budget amount, etc. A unit may be an individual, household or community as appropriate.

**Objectives/Outcomes** – The outcomes are the objectives or expected results that the agency hopes to achieve by performing the services and activities of the program. Individual activities can have objectives and outcomes. Each service/activity should lead to an outcome and national performance indicator; however a service/activity may be linked to multiple outcomes and national performance indicators.
Program Description/Activities – The program description is a comprehensive detailed narrative that clearly presents the services and activities offered. It includes specific terminology to describe processes used to deliver the service and activities. Each of the programs selected must address at least one (1) of the six (6) national ROMA goals.

National CSBG Goals – The six (6) national ROMA goals were designed to measure effectiveness and accountability for the expenditure of CSBG funds. ROMA goals measure results of programs and services at the local level. Each outcome is linked to a national ROMA goal.

Outcome Measures – Outcome measures are the national performance indicators and are linked to each major service/activity of the program as appropriate. National performance indicators may be called direct measure and/or outcome indicators.

Measurement Tools – Measurement tools are all methods of measurement used in collecting data for the program by service/activity.

Funding Categories – The funding categories to cover program costs are captured in the budget information section. The categories are:

- CSBG Allocation
- Non CSBG Funds Mobilized (Other Federal, State, Local, Private, In-kind)

Non-CSBG Funds Leveraged – CSBG funds are traditionally used to leverage other fund sources in order to eliminate or improve the conditions of poverty.
501   FISCAL MANAGEMENT OVERVIEW

501.1   Background

Non-profit agencies contracting with the State of Georgia must operate responsibly and employ guiding principles of sound fiscal management practices and generally accepted accounting procedures as outlined in the applicable portions of the Office of Management and Budget (OMB) Uniform Guidance: Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. Additionally, agencies must adhere to any other local, state and/or federal laws for financial management.

501.2   Requirement

The State Department is responsible for proper administration of the Community Services Block Grant. Ninety percent (90%) of the state appropriation is allocated to all eligible entities in the state.

The State Department administers the CSBG program through the following:

- CSBG Allocation Formula
- Cost Allocation Plan
- Audit Requirements
- Reimbursement Contract Requirements

502   USE OF FUNDS

502.1   Limitation on the Use of Funds

Federal law prohibits the use of CSBG funds for:

- the purchase or improvement of land and;
- the purchase, construction or permanent improvement (other than low-cost residential weatherization or other energy-related minor home repairs) of any building or other facility leased or owned

502.12   Waiver on Limitation on the Use of Funds

The law does provide for a waiver of the limitations by the Secretary of the Department of Health and Human Services (HHS).

Eligible entities may:
• submit a waiver request outlining the special circumstances to the State Department for consideration
• If approved, the State Department will submit the waiver request to HHS.

503 DISTRIBUTION OF FUNDS

503.1 CSBG Allocation Formula

The CSBG allocation formula is as follows:

- 65% of the allocation, hereafter known as the base allocation, is determined by each agency’s prior year award
- 35% of the allocation, hereafter known as the poverty allocation, is determined by the census poverty rate by county

Funds are allocated based on the previous year contingent upon official notification of the state grant award amount. If the award amount is greater than expected, the allocation of each eligible entity is increased.

503.2 Deobligation of Funds

This section will provide a background on statutory and regulatory requirements for terminating organizational eligibility or otherwise reducing the share of funding allocated to any CSBG eligible entity. A step-by-step description is provided in CSBG Information Memorandum 116, outlining necessary actions and considerations for terminating or reducing funds to a CSBG-eligible entity for cause.

These steps include:
1. State Monitoring and Review
2. Determination of Performance Deficiencies or Failure to Comply with State Requirement
3. Communication of Deficiencies and Corrective Action Requirements
4. Technical Assistance to Correct Deficiencies
5. Corrective Action Plan
6. Opportunity for a Hearing
7. State Proceedings to Terminate or Reduce Funding

503.21 Opportunity for Federal Review

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 thirty
(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 (HHS).

If a request for a review has been made, the State Department may not discontinue present or future funding until the Department responds to the request. Requests for Federal review must be received by OCS within thirty (30) days of notification of a State Department decision. If no request for review is made within the 30 day limit, the State’s decision will be effective at the expiration of the time.

Section 678C(b) of the CSBG Act specifies that a review by the Department of Health and Human Services shall be completed no later than ninety (90) days after the Department receives from the State Department all necessary documentation relating to the determination to terminate the designation or reduce the funding. If the review is not completed within ninety (90) days, the Act specifies that the determination of the State shall become final at the end of the 90th day.

**503.3 Discretionary Funds**

At least five percent (5%) of the State Department’s annual CSBG allotted funds will be reserved to fund state discretionary projects for special innovative and demonstration projects. Each year, the State Department will issue a notice of funding availability and fund projects that target assistance to low-income populations not currently being served though other CSBG program funds. Discretionary funds are open to all eligible entities and local nonprofits not currently funded through the CSBG program.

**503.31 Requirements**

The following requirements must be met to be considered for the award:

- The applying agency must be deemed a CSBG eligible entity or local nonprofit organization
- The program must have approved leveraged funds; **a maximum of 60% of the funds used for the program are to be CSBG discretionary funds (40% must be from a non-CSBG source)**
- A current Community Needs Assessment demonstrating a need for the intended program
- A completed application for discretionary funds with projected budget
- A program proposal detailing a two year plan to sustain the program without the use of discretionary funds
- Most recent third-party audit

**503.32 Examples of Eligible Programs**

Examples of eligible programs:

- Innovative programs that partner with local community institutions
• Emergency situations such as disaster assistance
• Capacity building activities for the Georgia Community Action Association
• Other activities, as appropriate, may be funded if they comply with the purposes of the CSBG program

For more information regarding Discretionary Funds or to request an application please contact your Project Administrator.

**504 COST ALLOCATION PLAN**

A cost allocation will be used to document, identify, and allocate all allowable costs of eligible entities. The allocations will be charged to cost centers and/or programs. When an allocation can be assigned directly to a program or cost center, the allocation shall be made in that manner. It will recognize all costs that are charged to the agency and not just the cost charged to federal or state programs.

**504.1 State Department Requirements**

The State Department requires:

- The total cost of an agency’s total expenses must be properly distributed to all programs
- The development and compliance with their individual cost allocation plan be approved by the State Department
- The total program cost (indirect and direct) be identifiable for each program even though funding from the appropriate fund source may be unavailable
- The updated Cost Allocation Plan to cover the current contract period
- Two (2) copies of the revised or updated Cost Allocation Plan must be submitted with the projected expenditures as contained in the Project Application Plan (PAP) to the State Department staff assigned to the agency by the designated date

The Project Application Plan (PAP) cannot be implemented without a specific plan for paying the total program cost.

The addition or deletion of a program during the program year does not require a revised Cost Allocation Plan as long as the methods of distribution are not changed.

**504.2 Cost Allocation Plan Requirements**

The minimum requirements for a Cost Allocation Plan include:
• A certification by a responsible official that the plan is accurate and prepared in accordance with applicable policies and procedures
• Schedules showing proper distribution of administrative cost
• An organization chart showing all programs or projects
• A brief narrative of the purpose and function of each program or project
• Audited financial statements from current audit

-OR-

• A certification by a responsible official that the plan is accurate and prepared in accordance with applicable policies and procedures
• Schedules showing proper distribution of administrative cost
• A complete copy of the negotiation agreement for an indirect cost rate with the cognizant federal agency

505  AUDIT REQUIREMENTS

All eligible entities must submit an independent audit to the State Department.

505.1  Federal Funds $750,000 or More

Contractors that expend $750,000 or more in Federal funds during their fiscal year must submit:

• A single entity-wide audit conducted for that year in accordance with the provisions of the Single Audit Act Amendments of 1996 (Public Law 104-156) and their implementing regulation, OMB Super Circular Uniform Guidance, Cost Principle and Audit Requirements: Section Subtitle 11 – Audits

• The audit-reporting package must be sent to:
  Georgia Department of Human Services
  Attn: Director, Internal Audits
  Office of Inspector General
  2 Peachtree Street, N.W.
  Suite 30-450
  Atlanta, Georgia 30303-3142

505.2  State Funds $100,000 or More

Contractors expending $100,000 or more in State funds during their fiscal year must submit:
• An entity-wide audit conducted for that year in accordance with Generally Accepted Auditing Standards issued by the American Institute of Certified Public Accountants.

• The audit-reporting package must be sent to:
  Georgia Department of Human Services
  Attn: Director, Internal Audits
  Office of Inspector General
  2 Peachtree Street, N.W.
  Suite 30-450
  Atlanta, Georgia 30303-3142

505.3 State Funds $25,000 to $99,999

Contractors expending at least $25,000 but less than $100,000 in State funds during their fiscal year must submit:

• Un audited entity-wide financial statements for that year.
• Assertions concerning the basis of financial statement preparation must be made by the president or other corporate official as listed.
• The audit-reporting package must be sent to:
  Georgia Department of Human Services
  Attn: Director, Internal Audits
  Office of Inspector General
  2 Peachtree Street, N.W.
  Suite 30-450
  Atlanta, Georgia 30303-3142

505.4 Audit Submission Timeframe

Contractors must submit the required audit or financial statements in the quantities set forth below within one hundred eighty (180) days after the close of their fiscal year as outlined in the contract document.

505.41 Failure to Comply

Title 50, Chapter 20, Sections 4 and 6 of the Official Code of Georgia Annotated state that failure to comply with these audit requirements could be cause the State Department to:
• suspend payments
• require a refund of all monies received under a contract
• prohibit the contractor from receiving funds from any state organization for a period of twelve (12) months
The audit must state that all activities are in compliance with the cost plan. If an agency has an HHS approved indirect cost rate, the audit must contain a statement that adjustments were made to reflect the final indirect cost rate.

506  REIMBURSEMENT

Contractors must expend funds in accordance with the State Department and Federal contract requirements and approved Project Application plan.

506.1  Issue of Payment

Reimbursement will be made by check or electronic fund transfer on a monthly basis contingent upon receipt of properly prepared Requests for Reimbursement Packets.

506.2  Request for Reimbursement Packets

Request for Reimbursement packets must be sent to the appropriate Project Administrator assigned to the contractor. Packets are due by the fifteenth (15th) calendar day following the month for which the request is made and must include the following:

- Signed Expenditure Report
- Signed Programmatic Report
- Monthly Dollar Value/Units Report (Monthly and Year-to-Date)
- Client Characteristics Report (Year-to-Date)
- Detailed General Ledger for Program
- Payroll Reports (if requesting reimbursement for any salary or fringe benefits), as requested

ROMA Performance Summary Reports (formerly quarterly outcome reports) should be submitted no later than the fifteenth (15th) calendar day following the end of each calendar quarter or the fifteenth (15th) calendar day following the end of the program year.

Requests for Reimbursement will not be recognized as received without all of the above. Failure to submit complete reports by the due dates is in violation of the contractual agreement and may result in delayed payment or non-payment.
506.3 Special Consideration

The State Department is responsible for the accountability, use, maintenance and lawful disposition of all real property titled to, assigned to, used by, or otherwise in its possession.

State Department contract includes special considerations reimbursements to include but are not limited to:

506.31 Travel
Contractors must comply with State Department travel regulations. Contractors may opt to pay less than the State Department allows but may not exceed these limits. For information related to property management, refer to www.georgia.gov and search by applicable key words.

506.32 Property
Contractors must comply with the State Department regulations for property management. Property valued at $5,000 or more must be reported to the State Department as required. For information related to property management, refer to www.georgia.gov and search by applicable key words.

506.321 Reporting Requirements for Property
It is the contractor’s responsibility to provide to the State Department on an annual basis:

- Acquisitions and dispositions to ensure that inventory listings are updated for insurance and other purposes
- Updated property listing when property is acquired with State Department funds or said property is disposed

506.33 Vehicles
Contractors must comply with the State Department regulations for vehicles. For information related to property management, refer to www.georgia.gov and search by applicable key words.

506.331 Reporting Requirements for Vehicles
It is the contractor’s responsibility to provide to the State Department on an annual basis:

- Acquisitions and dispositions to ensure that inventory listings are updated for insurance and other purposes
• Updated property listing when property is acquired with State Department funds or said property is disposed

506.4 Year-End Reconciliation

Contractors may submit a reconciliation reimbursement request within forty-five (45) days following the end of the contract period in order to make necessary adjustments or corrections that might have occurred during the contract period. Failure to submit the year-end reconciliation report within 45 days will result in non-payment of the expenditures.

506.5 Interest on Advances

Interest income earned on advances must be entered on the expenditure report under the applicable program category as a reduction of expenditures.

507 BUDGET REVISIONS

When budget adjustments are necessary, eligible entities must comply with the following:

• Budget revisions exceeding $5,000 must be submitted to the governing Board for approval and confirmed in the appropriate board meeting minutes.

• Budget revisions must be submitted to the State Department for approval under the following circumstances:
  o A deviation of line items exceeding fifteen percent (15%) within budget line item;
  o A revision in line item due to equipment purchases of $5,000 or more, if not included in original contract; OR
  o A revision due to an approved, revised indirect cost rate.

507.1 Submission of Budget Revisions

Budget revision requests must be submitted to the Project Administrator assigned to the agency, in writing, on the Budget Revision Form.

507.2 Review and Approval/Denial of Budget Revisions

Request for budget revisions will be reviewed and approved or denied by both Project Administrator assigned to the contractor and Program Director. The contractor will be notified when the request is approved/denied within thirty (30) days.
CARRYOVER FUNDS

Determination of unspent funds for possible carryover awards will be made after the reconciliation for the program year is completed. Carryover awards may not exceed twenty percent (20%) of the original contract amount plus the increase for the stated fiscal year to exclude the prior year’s carryover.

The State Department must receive the revised Project Application Plan (PAP) indicating the intended use of the carryover funds. Carryover funds will be made available to the contractor upon completion of the contract amendment process. **Eligible entities may not incur any expenses or revise the Budget and Expenditure Monthly Report document prior to receiving an executed contract. An Award Notification or Notice of Additional Funds does not constitute an executed contract.**

Carryover funds should not be used to incur a long-term expense and should be expended by the last day of the fiscal year following the original contact year.
601 CONTRACT REQUIREMENTS

Community Action Agencies and County Boards of Commissioners that contract with the State Department must conform to the standards and requirements imposed by federal and state law and the State Department Contracts Office. These requirements are defined in the Single Audit Act Amendment of 1996, OMB Super Circular A-133; Contract Provisions; State Department Policy; and Title 50, Chapter 20, Sections 1-8 of the Official Code of GA, Annotated.

602 CONTRACT PROCESSING

The contract processing procedures for the State Department are as follows:

1. A letter is sent to the eligible entity listing proposed allocation amounts and the documents necessary to process the contract including allocation letter showing proposed amounts for benefit and program administration
2. Contract training is offered by the State Department prior to the submission of contract documents
3. Eligible entities submit required contract documents for review
4. Contract documents submitted to State Contracts Department Office
5. Contracts are generated and submitted to eligible entity and State Division Director for signatures
6. Eligible entities receive a copy of the executed agreement

A contract status of in process, in compliance, in non-compliance, in suspension or terminated will be made available to eligible entities upon request.

602.1 Initial Contract Submission

All eligible entities are required to submit the following documents for initial contract submission:

- Contractor Information Sheet (2 copies)
- Resolution to Contract with Signature and Seal (2 copies)
- Project Application Plans (2 copies)
- CSBG Contractor Proposal (2 copies)
- Contract Budget Sheet and Monthly Expenditure Report without signature (2 copies)
- Board of Directors Roster that includes name, address, place of employment, term of service, category represented, and length of time in office
- List of Service Delivery Sites that includes the addresses, counties served, hours of operation, contact person, and telephone number (2 copies)
- Cost Allocation Plan or Approved Indirect Cost Rate (2 copies)
- Most Current Needs Assessment (1 copy)
- Security and Immigration Compliance (2 copies)
- W-9 (1 copy)
- CSS Supported Salaries (with Fringe Benefits) (2 copies)
- Verification of criminal records check (GAPS) (1 copy)
- Vendor Management Form with voided check (1 copy)
- Certificate of Liability Insurance ($1,000,000 each occurrence and $3,000,000 aggregate. DHS/DFCS must be listed as the Certificate Holder)
- Advance Documentation (if applicable)
  - Request for Advance Form 5214
  - Fidelity Bond
  - Annex Cover Sheet
  - Certificate of Insurance (Bond)
  - Statement of Need

602.2 Amendment Contract Submission

All eligible entities are required to submit the following documents for initial contract submission:

- Resolution to Contract with Signature and Seal (2 copies)
- Revised Project Application Plans (2 copies)
- Revised CSBG Contractor Proposal (2 copies)
- Revised Contract Budget Sheet and Monthly Expenditure Report without signature (2 copies)
- List of Service Delivery Sites that includes the addresses, counties served, hours of operation, contact person, and telephone number only if there are changes (2 copies)
- Cost Allocation Plan or Approved Indirect Cost Rate (2 copies)
- CSS Supported Salaries (with Fringe Benefits) (2 copies)

603 CONTRACTUAL NON-COMPLIANCE

If a contractor’s performance fails to meet the contractual requirements the State Department will notify the eligible entity in writing of the deficiencies and the need for the agency to submit in writing a Corrective Action Plan addressing specific planned corrections AND a time frame for completion of the corrective actions.

Upon review of the Corrective Action Plan by staff, the State Department will provide technical assistance and/or site visits to monitor progress and assist with the plan. If the Corrective Action Plan does not provide
reasonable and sustainable practices to correct deficiencies, the State Department will provide technical assistance and/or site visits to develop a Corrective Action Plan that will correct contractual deficiencies in a timely manner. The eligible entity shall remain in non-compliance until the approval of a Corrective Action Plan.

If the eligible entity fails to correct the deficiencies in accordance to the timeframe outline in the plan, payment will be withheld to the eligible entity until the agency is in compliance with the Corrective Action Plan.

604 CONTRACT SUSPENSION
The eligible entity fails to substantially provide the quality of services required, or, does not meet the specified completion schedule of duties required under the contract, the State will move to suspend the contract. This includes notifying the eligible entity’s Board of the contract suspension and halting payment of any expenditures from the date of the suspension.
701 REPORTING AND DATA QUALITY

The State Office is required to submit financial and statistical information to Federal oversight agencies, Congress, other state offices and interested parties to meet accountability and regulatory mandates. The use of the EasyTrak database is required by all eligible entities. It is the responsibility of the eligible entity to ensure data quality in EasyTrak and report accurate, complete and timely program information to the State. Additionally, the entity must respond accurately, completely and timely to periodic requests for ad hoc information.

702 REPORT USES

The State Department will utilize reports to verify program services are provided consistent with policies and procedures. Additionally, the State Department will use reports to issue payment, capture referrals, identify and correct deficiencies in the program, project anticipated completion of program activities and to report on money expended and balance of funds.

702.1 Reports Used

The following reports will be used to capture this information:

- The CSBG Monthly Expenditure Report
- The CSBG Monthly Programmatic Report
- The Quarterly ROMA Performance Summary Report
- The Monthly Dollar Value/Units Report (monthly and year-to-date)
- The Annual NASCSP IS Survey Report
- Client Characteristics Report (year-to-date, submitted quarterly)

702.12 Report Descriptions

The Expenditure Report is a request for reimbursement for the cost portion of the contract. This report is due to the state office by the fifteenth (15th) calendar day following the end of each month.

The Programmatic Report is a statistical report that shows services and activities performed to accomplish the program’s goals, in addition to the number of persons who participated in each program. It also shows the National Goal(s) that apply to the program and service. This report is to be submitted with the Monthly Expenditure Report by the fifteenth (15th) calendar day following the end of each month.
The **ROMA Performance Summary Report** is an inventory of outcomes and indicators that CAAs use to identify and measure client, agency, and community impact as conveyed in the six national CSBG ROMA goals. This report is due quarterly (December, March, June, September) along with the Expenditure Report and the Programmatic Report by the fifteenth (15th) calendar day following the end of each quarter and is titled **ROMA Performance Summary** in EasyTrak. Detailed information regarding the National ROMA goals and outcomes can be found at www.nascsp.org.

The **Dollar Value/Units Report** details the number of entries and units provided and associated with CSBG funded programs and activities. This report also captures service descriptions, entries and units for which no direct dollar expenditures were made (for example: Referral Services). This report is due monthly along with the Expenditure Report and the Programmatic Report by the fifteenth (15th) calendar day following the end of each month.

The annual **CSBG Information System (IS) Survey** is a required federal report that focuses on information of special interest to state and federal policymakers regarding the effectiveness of CSBG programs, the relationship of CSBG to other funding sources and the development of innovative programs. It tracks agency expenditures (not just CSBG expenditures) and collects ROMA outcomes and measures. Eligible entities are required to complete each section of the report and submit to the state no later than 45 days from the deadline for the state’s submission of the data to the federal government. The National Association for State and Community Services Programs (NASCSP) issues instructions for completing all sections of the survey annually and IS Survey materials, information and instructions can be found at www.nascsp.org.
801 OVERVIEW OF MONITORING

Monitoring is the mechanism used to ensure that federal funds are being administered properly at the local level. The federal government requires that CSBG programs be monitored nationally at least once every three (3) years. In the State of Georgia, CSBG programs may be monitored at any time, with or without notice during the contract period but no less than once every three (3) years. Additional visits may include activities such as:

- Providing consultation on programmatic issues
- Providing technical assistance, as needed
- Providing training, as requested
- Attendance at least one Board meeting or GCAA Quarterly Board Meeting
- Other reviews as appropriate

Each service provider will be monitored to ensure compliance with CSBG program requirements. When an eligible entity is found to be out of contractual compliance, the State Department will initiate remedial action.

801.1 Definition of Monitoring

The State Department defines monitoring as a comprehensive approach to ensuring compliance with Federal regulations governing the CSBG program, including reviewing, assessing, evaluating, and improving the quality and types of services provided by CSBG eligible entities to low-income individuals and families.

801.2 Guiding Principles to Monitoring

- Mutual Respect – In working with local boards, staff, and consultants, the State Department recognizes and will value the unique knowledge, ability, and independence of each person. We are committed to treating all persons fairly and maintaining credibility by matching actions with words.

- Open Communication – Effective communication is key in facilitating good working relationships amongst partners, and the State Department is committed to keeping lines of communication open. The purpose of our communications is to assist in developing solutions to problems, to share program improvement ideas, and to provide information on new developments in the anti-poverty field. We will
communicate frequently through a variety of tools and media. The State Department is committed to listening to suggestions and concerns, to gaining an understanding of local operations, and to assisting local eligible entities in pursuing their priorities.

- **Joint Problem Solving** – The State Department believes that a team approach to problem solving is in the best interest of all parties involved. Our office sincerely believes that collectively the State Department, the eligible entities, and our other community action partners can arrive at the best solution to any situation. Through a team approach to problem solving, we can come up with the best strategies for program development, conflict resolution, and compliance issues. The State Department wants to promote an environment in which our office and all our community action partners will be open to change and can work together in exploring options and developing mutually agreeable solutions. The goal is to have agencies function independently but with the State Department support in an effort to meet the needs of local communities within the parameters set by legislation.

**801.3 Monitoring Methodology**

The Program Manager of Community Based Programs at the State Department is the key contact person between the State Department and the eligible entities. The Project Administrator oversees ongoing reviews of the eligible entities’ monthly requests for reimbursement and program performance reports.

In addition to the ongoing reviews performed by the Community Based Programs Division, the following tools, checklists, and guides will be implemented by the Office of Audits to monitor the financial, programmatic and administrative compliance of eligible entities awarded funding under the CSBG program. These guides and checklists were developed utilizing information from various resources, including a review of the monitoring tools used by several other states.

**801.4 Introduction to CSBG Monitoring Tools**

The CSBG Pre-Visit Questionnaire and Internal Control Questionnaire will be sent or emailed out to the eligible entities in advance of the on-site visit. Studies have shown this method to be quite effective as a representative from the eligible entities provides the answers in advance, allowing the Compliance Auditor an opportunity to review the information before the actual on-site visit and customize the review planning process. An electronic version of these tools has been developed to facilitate the response of the eligible entities within the context of this document.
The **Program Monitoring Tool** will be used for the portion of the monitoring visit that focuses on reporting, governance, client eligibility and program operations.

The **Financial Monitoring Tool** will be used for the portion of the monitoring visit that focuses on internal controls, financial policies and procedures, cost allocation and time distribution plans, compliance with OMB Circulars and/or OMB Super Circular, results of prior audits and prior monitoring reviews, automated accounting system and current operating environment, and overall financial management of the organization.

The **Internal Control Evaluation Checklist** will be completed after reviewing a sampling of transactions and working through the Financial Monitoring Tool. In working with this tool, frequent reference should be made to the information provided by the eligible entities in the Internal Control Questionnaire obtained prior to the on-site visit. The primary objective of this tool is to determine if the agency is truly operating under the internal controls they “think” they have in place per the information provided in the questionnaire.

The State Office believes that collectively, these tools provide the framework for a comprehensive review of eligible entities’ board governance, planning, evaluation, partnering and collaboration efforts, administrative systems and fiscal procedures.

### 802 NOTIFICATION OF ON-SITE MONITORING VISIT

State staff will arrange visits initially by telephone or email with the Executive Director or the CSBG Program Director or designee. After a date is agreed upon, a letter of confirmation will be mailed to the Executive Director. The letter will outline the specifics of the visit, including the areas that will be monitored. The letter will also inform the Executive Director of specific documents that will be reviewed during the on-site monitoring in addition to documents that must be submitted to the State Department prior to the visit.

### 803 COMPONENTS OF AN ON-SITE MONITORING VISIT

#### 803.1 Entrance Conference

An entrance conference will be held upon arrival at the administrative office. At a minimum, those present should include the executive director, fiscal officer, and the CSBG program director or their designees. Any other person deemed necessary by the executive director may also be included.

The purpose of the entrance conference is to explain what will be included in the visit and how it will be carried out. It is also an opportunity to address any concerns or suggestions.
803.2 Exit Conference

An abbreviated exit conference will be held at the end of the administrative review, giving a report of only those documents reviewed. At a minimum, those present should include the executive director, fiscal officer, and the CSBG program director or their designees. Any other person deemed necessary by the executive director may also be included.

Following the exit conference, the eligible entity will receive, in detail, written summary of the visit.

803.3 Program Evaluation

Eligible entities will be evaluated on the following components:

- Board structure/status
- Administrative/program operations
- Fiscal operations
- Organizational structure
- Case record reviews

Official monitoring tools will be made available to the eligible entity prior to the on-site monitoring visit. Details regarding the specific components to be reviewed can be found in the Notification of On-Site Monitoring Visit.

804 MONITORING RESULTS

A written report outlining the results of the visit will be written to the Executive Director, with a copy to the Board Chair, within sixty (60) business days if any major findings exist as a result of the visit. This report will outline any findings, areas of improvement/recommendations, and/or commendations. For the purpose of the monitoring report findings, observations, and commendations are defined as:

Finding: A programmatic deficiency requiring a corrective action (e.g. board composition does not comply with the required compilation – the low-income population is under-represented)

Areas of Improvement/Recommendations: Noteworthy of mentioning, however, not considered a deficiency (e.g., notification of the Fair Hearing process was posted on the bulletin board, however, it was not visible because it was covered by another notice)

Commendation: An expression of approval or praise (e.g., client files were found to be in excellent condition with all the required documents)
805  CORRECTIVE ACTION PLAN

Corrective action will be determined by the monitoring team and will be addressed in the monitoring report. The eligible entity will be given forty-five (45) business days to inform the State of the plan for addressing the findings. Implementation of the corrective action plan must begin within fifteen (15) business days after acceptance of plan by the State Department.

Corrective action plans must include all of the following:

- Action to be taken to address the finding(s)
- Individual(s) responsible for addressing the finding(s)
- Timeline(s) for completion

Plans will be monitored for compliance with timelines and activities.

Eligible entities may request a re-consideration if there is documentation that would change and/or nullify the required corrective action. **Such requests for reconsideration must be submitted in writing within thirty (30) business days from the date of the written report to the agency.**

If the plan for corrective action as approved is not carried out, the State may withhold payments until such plan, as approved, has been implemented.

806  INTERNAL MONITORING

Eligible entities should perform an internal monitoring of all areas of operation to ascertain strengths, weaknesses or concerns within the agency. Each provider must maintain copies of all evaluations of file reviews and other areas of agency operations.

The State Office recommends that internal monitoring be performed at least two (2) times during each program year.

The State Office maintains copies of sample internal monitoring documents that eligible entities may use to meet this requirement. Please request these documents from your Project Administrator.
901 TRAINING

Training on Community Services Block Grant policies and procedures is a shared responsibility of both State and eligible entity staff. This section outlines the types, responsibilities and expectations of CSBG technical assistance and training processes.

State level, local level and on-going training sessions will be held during the CSBG program year at the request of the eligible entity or after a need is identified by state or local staff. This training will consist of policy and system training.

State staff will provide CSBG policy and procedure training before the beginning of each program year to the eligible entity CSBG Coordinators and other applicable staff. Often, the training approach will be “Train the Trainer” sessions. Once trained by the State Office, coordinator staff must then train local office staff. When feasible this training will be conducted via telephone conference calls.

Routine, local level training is the responsibility of the eligible entity, and must be provided by CSBG Coordinators to all application intake staff, CSBG case managers, and other staff responsible for CSBG program functions.

State Department staff is also available to do structured, formalized training as well as individualized training and technical assistance. State staff is also available to perform Board training for new board members or refresher training for on-going board members.

On-going training must be provided in for the following instances:

- when new/existing employees assume or are assigned new CSBG program responsibilities
- when internal review identifies program deficiencies
- when a State Office review identifies program deficiencies as part of corrective action steps

It is optional that local level and on-going training sessions should have the following three (3) forms completed by each trainee:

- Sign-in sheet
- Evaluation forms
- Workshop Summary or Agenda

An agenda for each training session (state level, local level, and on-going) should be created for each training session.
902 TECHNICAL ASSISTANCE

Technical Assistance will be provided by State Department staff when requested by the eligible entity or as soon as a deficiency in agency procedures or policy application is noted.

Routine technical assistance questions will be handled between the state staff and local entities via telephone and email whenever possible. Site visits, in-area training and the use of technical assistance services from other qualified providers will also be conducted depending on the nature of the assistance needed.
The State Department must ensure consistent, fair and equitable treatment to all applicants. All eligible entities must comply with prescribed procedures to protect the rights of applicants. Financial eligibility is determined by household income. The cost of any services provided to ineligible persons, as determined by the State Department, shall be reimbursed by the agency.

1001  TYPES OF INCOME

All income received from any source by the household is considered in determining eligibility. Income received is considered to be earned, unearned or disregarded.

**Earned** is income received from wages, salaries, commissions, or in exchange for services rendered.

**Unearned** is income received from any source other than those listed above.

**Disregarded** is income not counted in the eligibility determination process, as listed under Income Disregards in section 1005.

1001.1  Income Determination

Eligibility based on income is determined by resolving the following series of questions:

- What is the income limit for the household?
- What is the gross monthly household income?
- What is the source of the income?
- Is the income available to the household to meet its needs?
- Is the income included or excluded?
- How often is the income received?

1001.12  Income Limits

Section 673(2) of the Omnibus Budget Reconciliation Act (OBRA) of 1981 (42 U.S.C. 9902(2)) requires the Secretary of the Department of Health and Human Services (HHS) to update the poverty guidelines at least annually, adjusting them on the basis of the Consumer Price Index for All Urban Consumers (CPI–U). The poverty guidelines are used as an eligibility criterion by the Community Services Block Grant program and a number of other Federal programs. The Department of Health and Human Services issues an annual update of the HHS Poverty Guidelines during January of each year to account for last calendar year’s increase in prices as measured by the Consumer Price Index.
The State Department shall enforce all guidelines prescribed by HHS, as updated through the CSBG program year. Updates to the CSBG poverty guideline shall be issued annually in memorandum by the Project Administrator. The Agency shall follow the method of income determination outlined in the memorandum in determining client eligibility, and shall maintain documentation of such determination in appropriate client files. **It is the responsibility of the eligible entity to ensure income limits are updated in EasyTrak annually.**

1001.121 Re-certification of Income

All clients must be re-certified for program income eligibility **at least once** during the program year; however it is recommended that re-certification be done every ninety (90) days. For programs that re-certify every 90 days, there may be instances where a client’s current income will increase and exceed the income limit for the household while enrolled in the program. Clients who are enrolled in a short- or long-term program (non-emergency assistance) should not be excluded from continuing the program due to increased income during the program.

1001.13 Income of Household Members Under Age 18

Income of household members under 18 years of age is not considered when determining eligibility for CSBG.

1002 INCOME CONSIDERATIONS

All income received by household members over the age of eighteen (18) and non-citizens (ineligible aliens) are to be considered and included in household income calculations.

1002.1 Non-citizen (Ineligible Alien) Income

Income of a non-citizen of the household member is applied to the income limit(s) for the household size. The income is to be included as household income, however the non-citizen should not be counted in the household count. [For example, if there are four (4) members of the household and one (1) is undocumented with a combined income of $20,000, only three (3) household members should be considered with a total income of $20,000.]

1002.2 Joint Income

- Income is included if the individual has accessibility to the home and has the legal authority to reside within the home.
- If a household member receives income jointly with another person or a group of persons, the portion that belongs to the household member is determined as follows:
• If there is an agreement between the parties that specifies how they will divide the income, this agreement is used to determine the amount of income to consider.
• If there is no agreement, a pro rata share of the income is counted to the member whose income is being considered.

1002.21 Definition of a Household Member

Income is included if the individual has accessibility to the home and has the legal authority to reside within the home.

1002.3 Bankruptcy

Bankruptcy is a condition whereas a debtor, either voluntarily or invoked by a creditor, is judged legally insolvent, and the debtor’s remaining debt(s) is administered and distributed to his/her creditors.

Income directed to pay creditors in a bankruptcy should not be deducted from gross income in the budget, unless the income is otherwise exempt by policy.

1002.4 Garnishments

Garnishment is a condition whereas a debtor has wages/monies withheld by an employer/entity to pay a debt owed to a third party.

Income directed to pay creditors via garnishment should not be deducted from gross income in the budget, unless the income is otherwise exempt by policy.

1003 VERIFICATION OF INCOME

The customer should provide verification from the payment source. If the customer cannot obtain the verification, the agency may request it directly from the payment source. Verification can be obtained from a collateral source, a person who has knowledge of the income, if verification cannot be provided by the payment source. Income is calculated on gross wages, less any income disregards. Certain types of income should be disregarded as income when calculating the eligibility of potential clients. These income inclusions and exclusions are listed as follows:
<table>
<thead>
<tr>
<th>Type of Income</th>
<th>Details and How to Verify</th>
<th>Include</th>
<th>Exclude</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adoption Assistance</td>
<td>Unearned payment received for the adoption of certain children, verify from adoption agency or award letter</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Advance Payment</td>
<td>Unearned payment received for future expenses or EARNED prepayment of salary or wages. Verify by check stub or letter</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Agent Orange Payment</td>
<td>Unearned payment made to Vietnam Veterans exposed to Agent Orange or to their survivors. Verify by award letter or statement from Veterans Administration.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Alimony</td>
<td>Unearned court ordered payment from former spouse. Use copy of Court Order or check.</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Annuity</td>
<td>Unearned payment received from an investment plan. Use annual or quarterly statements from source.</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Blood</td>
<td>Earned money received from sale of blood. Verify payment rate from buying institution.</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Boarder</td>
<td>Rent paid by a roomer. All rent over the first $70.00 per month is considered as earned income. Person not included in determining household size.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Bonus</td>
<td>Earned treat as salary or wage</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Capital Gains</td>
<td>Earned or unearned profits for sale of capital assets such as real estate, stocks. A capital gain is realized when the asset sold has increased in value from the original purchase price.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Child Support</td>
<td>Unearned income received from an absent parent for the support of their child(ren). Verify by court order, probation office, directly from absent parent, Office of Child Support Enforcement.</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Commission</td>
<td>Earned payment in exchange for services. Count and verify as wages</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Contribution/Cash gift</td>
<td>Unearned money given to household member. Verify by statement from contributor or statement from client</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Disability Payment</td>
<td>Unearned payment from an insurance company paid to employee due to illness or disability.</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Dividend</td>
<td>Unearned share of company profits. Use financial statements from company</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Donation</td>
<td>Unearned.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Farm Income</td>
<td>Gross receipts minus operating expenses from the operation of a farm by a person on his/her own account, as an owner, renter or sharecropper. Gross receipts include the value of all products sold, government crop loans, money received from the rental of farm equipment to others, and incidental receipts from the sale of wood, sand, gravel and similar items. Operating expenses include the cost of feed, fertilizer, seed, and other farming supplies, cash wages paid to farmhands, depreciation charges, rent, interest on farm taxes (not state or federal income taxes), and similar expenses. The value of fuel, food or other farm products used for family living is not included as part of net income.</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Interest</td>
<td>Unearned money received from investments. Use financial statement from paying institution. The first $25.00 in interest is disregarded.</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Irregular income</td>
<td>Unearned or Earned money that is received on an unpredictable or infrequent basis. Compute quarterly income, divide by 12 weeks to determine weekly average, multiply by 4.3333</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Type of Income</td>
<td>Details and How to Verify</td>
<td>Include</td>
<td>Exclude</td>
</tr>
<tr>
<td>--------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>---------</td>
<td>---------</td>
</tr>
<tr>
<td>Job Corps</td>
<td>Earned income includes Living Allowance, Readjustment allowance. Unearned income includes Allotments sent to a dependent child.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Lottery Winnings</td>
<td>Unearned sum of money paid as a prize in a game of chance. Budget in the month of receipt.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Military Allotment</td>
<td>Unearned payment paid to spouse or dependent child of military personnel.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>National Guard and Reserve Pay</td>
<td>Earned Income. Verify with check stub or military documents.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Pension</td>
<td>Unearned payment received regularly as a retirement benefit</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Rental Income</td>
<td>Earned income received on property owned by a household member and rented to others. Use lease or rental agreement to verify.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Roomer</td>
<td>Earned payments received for room only. Do not include roomer in household size. Include amount over $30 monthly as income.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Severance Pay</td>
<td>Earned payment received from an employer upon termination of employment</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Sick Pay</td>
<td>Earned income paid from payroll to employee when out of work because of illness. Use check stubs. Unearned when paid by insurance company or other source. Use check stubs or financial statement from institution.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Social Security Benefits (RSDI)</td>
<td>Unearned Retirement, Survivors, Disability Insurance received from the Social Security Administration. Use award letter for gross amount of check</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Strike Benefits</td>
<td>Unearned income received by individuals on strike. Use check stubs, statement from union or financial institution</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Supplemental Security Income (SSI)</td>
<td>Unearned Benefits paid by the Social Security Administration for Aged, Blind or Disabled person. Use award letter as verification or copy of check.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Temporary Assistance for Needy Families (TANF)</td>
<td>Unearned cash payment.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Tips</td>
<td>Earned income. Use tax documents, self-declaration or employer’s statement</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Training Allowance</td>
<td>Earned payments received from vocational/rehabilitation programs not intended for reimbursement.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Unemployment Compensation</td>
<td>Unearned benefits received from the Department of Labor by unemployed persons. Use copy of check or award statement to verify.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Vacation Pay</td>
<td>Earned. Employer incentive shown as wages.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Veterans Benefits</td>
<td>Unearned benefits received from VA for disability, survivor benefits, and education.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Wages/salary</td>
<td>Earned income, received for work or services.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Workers Compensation</td>
<td>Unearned benefits received periodically from private or public insurance companies for injuries incurred at work. (The cost of this insurance must have been paid by the employer and not the individual).</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Type of Income</td>
<td>Details and How to Verify</td>
<td>Include</td>
<td>Exclude</td>
</tr>
<tr>
<td>--------------------------------------</td>
<td>------------------------------------------------------------------------------------------</td>
<td>---------</td>
<td>---------</td>
</tr>
<tr>
<td>Property Sale</td>
<td>Money received from the sale of property such as a house or car (unless the person was engaged in the business of selling such property, in which case the net proceeds would be counted as income from self-employment)</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Bank Withdrawals</td>
<td>Withdrawal from bank deposits</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Borrowed Funds</td>
<td>Money borrowed</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Income Tax Credits/Returns</td>
<td>Tax refunds</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Inheritances</td>
<td>Lump sum inheritances or insurance payments</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>SNAP Benefits</td>
<td>The value of the benefit from Supplemental Nutrition Assistance Program (SNAP) formerly known as Food Stamps</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Donated Food</td>
<td>The value of USDA donated foods (surplus commodities)</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Uniform Location Assistance</td>
<td>The value of funds received for real property acquired from displacement in connection with federally funded projects. See Uniform Act of 1970.</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Minor Income</td>
<td>Earnings of a child in the household under 18 years of age</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Restricted Funds</td>
<td>Loans and grants, such as obtained and used under conditions that preclude their use for current living costs</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Education Income</td>
<td>Any grant or loan to any undergraduate student for educational purposes (includes HOPE scholarships, PELL Grants, National Defense Student Loans, and Guaranteed Student Loans)</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Value of Produce</td>
<td>Home produce used for household consumption</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Other Care Payments</td>
<td>TANF Foster Care or Nursing Home Vendor Payments made to a provider on behalf of an adult or child</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Payments to Institution</td>
<td>Payments made to an institution by a relative of a recipient or other person for the cost of institutionalization of that recipient</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>VISTA</td>
<td>Payments to VISTA volunteers regardless of age</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Job Training Partnership Act</td>
<td>Earnings received by any youth (up to 21 years of age) through the JTPA Program</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Older Americans Act</td>
<td>Benefits received from elderly volunteers and nutritional programs operated under the Older Americans Act</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>LIHEAP Funds</td>
<td>Assistance provided by Community Action Agencies to prevent fuel cut-offs or to promote energy efficiency under the Emergency Energy Conservation Services Act</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Foster Care/Adoption Supplement</td>
<td>Foster Care payments, Adoption Supplement Payments</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Type of Income</td>
<td>Details and How to Verify</td>
<td>Include</td>
<td>Exclude</td>
</tr>
<tr>
<td>--------------------------------</td>
<td>------------------------------------------------------------------------------------------</td>
<td>---------</td>
<td>---------</td>
</tr>
<tr>
<td>Roomers/Boarders</td>
<td>Income from roomers under $30.00 per month and boarders under $70.00 per month</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Savings/Bonds</td>
<td>Earnings and interest on savings or bonds amounting to $25.00 or less per month</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Disability Care</td>
<td>Any wages, allowances or reimbursement for transportation and attendant care costs when received by an eligible disabled individual employed in a project under the Rehabilitation Act of 1973</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Trust Funds</td>
<td>Funds held in trust for any individual in the satisfaction of a judgment of the Indian Claims Commission</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Alaska Native Settlement Act</td>
<td>Payments made pursuant to the Alaska Native Claims Settlement Act</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Job Provided Meals</td>
<td>Meals furnished on the job by the employer</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Casual Earnings</td>
<td>$5.00 or less from casual earnings when work opportunities are unpredictable</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Health Premiums</td>
<td>Premiums (amount spent on premiums paid by Social Security received by Medicare)</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>HUD Utility Allowances</td>
<td>Utility Allowances as furnished through the HUD housing program</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Emergency Disaster Relief</td>
<td>Disaster Relief payments</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Guardianship Subsidy</td>
<td>Relative Care Subsidy and Subsidized Guardianship program income received for the support for children previously in DFCS custody</td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>
Income should be calculated as follows:

<table>
<thead>
<tr>
<th>Frequency</th>
<th>Conversion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weekly</td>
<td>Multiply by 4.3333</td>
</tr>
<tr>
<td>Bi-weekly</td>
<td>Multiply by 2.1666</td>
</tr>
<tr>
<td>Semi-monthly</td>
<td>Multiply by 2</td>
</tr>
<tr>
<td>Quarterly</td>
<td>Divide by 3</td>
</tr>
<tr>
<td>Semi-Annually</td>
<td>Divide by 6</td>
</tr>
<tr>
<td><strong>Unemployment</strong></td>
<td>Multiply by number of benefit weeks, then divide by 12</td>
</tr>
<tr>
<td><strong>Income</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Irregular</strong></td>
<td>Determine 12 month total, then divide by 12</td>
</tr>
<tr>
<td><strong>Self-Employment</strong></td>
<td>Tax Statements, Deduct the cost of doing business, then divide by 12</td>
</tr>
</tbody>
</table>
1101 CLIENT ELIGIBILITY

Complete, accurate and timely eligibility determination, application processing, payment of services, and referral for service is crucial for the CSBG Program. Eligible entities must complete an application for all persons who request assistance through the Community Services Block Grant Program. Approval for services is based on funds available.

All households have the right to apply for services and must be given the opportunity to make an application. Eligibility is determined for a household or a family unit. Eligibility, once established is effective for twelve (12) months, unless circumstances change which makes the person ineligible. Persons with Limited English Proficiency must have equal access to all benefits and services.

1101.1 Basic Eligibility Criteria

The applicant must meet the basic eligibility criterion below:

- Households must be at or below 125% of the Federal Poverty Guidelines
- Household applicant must be a US citizen or a legally admitted alien with a social security card (see Citizenship).
- Households applying for assistance must reside in the geographic area serviced by the service provider

1101.2 Household Composition

The applicant must be a member of the household and must provide information on all individuals living in the household. The information must include:

- Name
- Relationship to the head of household
- Age/Date of Birth
- Social Security Number
- Income

1101.21 Household Members to Include

In addition to the applicant and adults over the age of eighteen (18), be sure to include the following:

- Dependents such as children, adopted children, grandchildren under 18
- Disabled sibling(s) or parent(s)
- A spouse that utilizes the home as a place of permanent residency
- Siblings over age 18 must be included
• Roomers should not be included in the household count however their income should be included in household income calculations

1101.22 Separate Households

If several households live together at the same address but maintain separate cooking and eating facilities or arrangements then they can be considered as separate households and each is eligible to apply for CSBG services.

The agency will accept the head of household’s written statement regarding members of the household and their status as a separate household with a corroborating signature of the other head of household.

A Separate Household may also include:

• A teenage parent under age eighteen (18) living on their own
• A teenage parent who is living as a separate household in another household with other unrelated adults.

1101.3 Social Security Information

A social security number must be provided for every member of the household. Examples of documents that may be used to verify Social security numbers are:

• Social security card
• Social security or SSI award letter (must show name, date of birth, and social security number)
• Screening on SUCCESS to see if a valid SSN is in system
• Other service record if SSN has been verified (e.g., Energy Assistance Application)

If a new baby does not have a SSN, the household has to verify that an application has been made for a SSN. A copy of the document used to show social security information must be kept in each applicant client’s file for every member of the household. A household may not be able to provide verification of a SSN in cases of a fire or natural disaster. In these instances, the household’s statement is acceptable.

1102 CITIZENSHIP

If the applicant client cannot / does not verify citizenship/legal alien status for all members of the household, intake workers should process the application counting all income from the ineligible applicant. Do not include applicant in household count. Undocumented parents are ineligible for program consideration, but they may apply on behalf of documented minor children. The parent’s income will be counted in the eligibility determination but the undocumented parent(s) will not be included in the household count.
1102.1 Citizenship Status Eligible for Program Consideration

United States Citizens:

- born in one of the 50 states,
- the District of Columbia,
- Puerto Rico,
- Guam,
- the US Virgin Islands, or,
- fulfilled all requirements and completed the process of naturalization

Immigrant (Legal) Aliens:

- admitted to the US for lawful permanent residence,
- Cuban/Haitian Entrants,
- asylees,
- parolees,
- persons granted amnesty
- conditional entrants

Non-Immigrant Aliens:

- admitted to the US for lawful temporary residence
- admitted for temporary employment
- tourists
- foreign students and diplomats

1102.2 Citizenship Status Ineligible for Program Consideration

Undocumented Aliens:

- not in the US lawfully
- residing in the US without INS documentation
- in violation of the terms of a non-immigrant visa

1102.3 Non-English Speaking Households

The eligible entity must ensure that all lawfully admitted aliens with Limited English proficiency have access to the program by providing one or more of the following:

- provide outreach information in languages specific to those persons
- hire or have access to bilingual staff
- contract interpreter services
- utilize community volunteers/ethnic organizations
- utilize the Language Line
1103 SPECIAL CONSIDERATIONS FOR ELIGIBILITY

1103.1 Categorically Eligible

A household will be considered categorically eligible if:

- The only income/resources in the household are SSI and/or TANF, and/or Food Stamps
- The head of household receives Medicaid
- Adult members who receive specific services under the Workforce Investment Act (WIA) in a One-Stop Service Center when the service provider is a partner in the local WIA initiative and is housed at a One-Stop Center covered by the WIA legislation

At least seventy-five percent (75%) of those served under categorically eligibility must meet the CSBG eligibility guidelines. Service providers must verify this condition is met by a 10% sampling of categorical households during the specific program year. The results of the sampling must be available for review by the State Department staff.

In addition to being in the client's file, copies of Categorical Eligibility forms and/or client applications will be kept in a separate file by month of service. Files must be available to the State Department staff for review.

1103.1 Group Eligibility

Group eligibility can only be used in situations where a disaster has been declared by either the Georgia Emergency Management Agency (GEMA) or the Federal Emergency Management Agency (FEMA).

Agencies may determine eligibility on a group basis if it can reasonably conclude that substantially all members of the group of households affected in a specific area have income that does not exceed CSBG limits.

At least seventy-five percent (75%) of the members of the group must be CSBG eligible.

In the event of a disaster, agencies must notify the State Department staff that they will be doing group eligibility in the affected areas.

Only emergency services should be provided for this type of service and services should not continue past thirty (30) days of each major occurrence. The activity will not duplicate benefits provided by another state or voluntary agency such as Red Cross.

A written application is not necessary; however, a log must be kept with the client's name, address, telephone number and declared income for each household requesting service.
The agency must develop and maintain on file by disaster, the agency’s plan for providing service during the disaster and for validating that at least seventy-five percent (75%) of the households served meet CSBG guidelines.

This should include verification of at least a ten percent (10%) random sampling within six (6) months of the activity. Group eligibility will be based on one hundred twenty-five percent (125%) of the poverty income guideline except when designated otherwise by the State Department.

The agency must also maintain a file by disaster of families served under the group eligibility provision.

1104  ELIGIBILITY FORMS

Forms used to determine eligibility should be as follows:

- Agency Intake form
- Application for Services (Eligible entities must use the document provided in EasyTrak)
- Request for Verification Form (if needed)
- Release of Information Form (if needed)
- Declaration of Zero Income Statement
- Authorized Representative Form (if needed)
- Separate Household Form (if needed)
- Self-Declaration of Income (if needed)
1201 INTAKE PROCESS

The intake worker will determine eligibility for CSBG services by completing at a minimum:

1. Complete the eligible entity’s intake form; explain the Client Fair Hearing Form and Release of Information Form and obtain the applicant or authorized signer’s signature on both forms. If an applicant signs with an “X”, the signature should be witnessed by another individual preferably someone other than the intake worker when at all possible.

2. Assess need for services: immediate need as well as secondary needs that present a barrier to self-sufficiency.

3. Review all information provided such as documentation of identity, verification of household income, proof of residency, household composition, copy of bill or eviction notice, etc. and determine eligibility.

4. If all required documentation is provided and applicant meets income guidelines, the client may be considered for services. All applicants must receive a notice of approval or denial once their application has been processed.
   a. If information is inconsistent or not provided, the case is held as pending. The applicant will be given Request for Verification form with a due date for missing information. The applicant and the case manager should reach an agreement upon a reasonable length of time to return any missing/incomplete documentation. After the due date applications may be denied as unable to establish eligibility. Applications cannot be denied for lack of verification until the next business day following the due date specified on the Verification Form.

5. Input applicant information into EasyTrak for processing.

6. Schedule follow-up in 30, 60 or 90 days as appropriate.

1201.1 Standard of Promptness

All applications for services must have eligibility for services determined as soon as possible, but no later than thirty (30) calendar days from the date of application, if the household has provided all necessary information for completing the application.
1202 CASE RECORDS REQUIREMENTS

Service providers must maintain a file on each household requesting CSBG funded services with the exception of Categorically Eligible and disaster related Group Eligibility clients.

1202.1 Case Record Contents

At a minimum, the following should be maintained in every client file and available upon review from the State Department at any time:

- Signed completed application containing the clients full name, social security number and address
- Completed names and demographical information on each household member
- Copy of the Head of Household and/or Applicant’s State Issued ID
- Copy of each household member’s Social Security Card or other acceptable documentation containing the full Social Security Number
- Verification and source of income
- Documented eligibility period
- Evidence of eligibility re-certification for non-emergency services
- Explanation of service(s) requested
- Intake Worker signature
- Follow-up and disposition
- Calculation of gross monthly income
- Authorization for Release of information Form (completed and signed)
- Signed Fair Hearing statement
- Signed and completed DHS Evidence of Child Support Referral Form
- Current EasyTrak Scales and Service Activity reports

1203 FRAUD AND ABUSE

As a grant recipient, you can protect your organization and the source of your federal funds by detecting and preventing fraud:

1. Establish an adequate and effective system of accounting, internal controls, records control, and records retention.
2. Implement an internal compliance and ethics program that encourages the recognition and reporting of fraud, waste, or abuse.
3. Report suspected fraud to the DHS Office of Inspector General of the State of Georgia
The DHS Office of Inspector General provides oversight to ensure the work of DHS is conducted according to state and federal laws, and administrative policy, procedure, and practice. Our goal is to actively seek to eliminate poor management practices, fraud, waste, and abuse within DHS programs and to uncover criminal conduct by employees, contractors, or recipients of public assistance benefits. These services are provided through five distinct units: Background Investigations Unit, Internal Audits Unit, Benefits Recovery Unit, Internal Investigations Unit, and the Residential Child Care Unit.

HOW TO REPORT FRAUD, WASTE OR ABUSE:

Reporting is easy, safe and secure. You can report online, or by phone, mail, or fax.

OIG Hotline: 1-866-435-7644 (1-866-HELPOIG)
OIG Online Complaint Form: http://oig.georgia.gov/webform/oig-complaint-form
U.S. Mail: 2 M.L.K. Jr. Drive SW
            1102 West Tower
            Atlanta, Georgia 30334
1301 FAIR HEARING OVERVIEW

The CSBG State Plan requires a due process hearing within the state department. The Office of State Administrative Hearing (OSAH) is responsible for the fulfillment of the hearing provision. All applicants/clients shall receive fair and equitable treatment and may question any decision or action taken by the eligible entity.

1301.1 Requirements of Informing Clients of the Right to a Fair Hearing

Eligible entities must inform each applicant/clients in writing of the following:

- The right to a fair hearing whenever any action affects his/her application/benefit
- The right to be represented by an authorized representative such as legal counsel, relative, friend or other spokesperson
- The right to represent oneself
- The right to timely and adequate notice of denial/benefit change

1301.2 Fair Hearing Procedures

Applicant/client must file hearing request within ten (10) calendar days after notice of denial/change.

The eligible entity has responsibility to take prompt action in reviewing and correcting all complaints. The entity is required to assist applicant / client in filing a hearing request and preparing for the hearing.

Applicant is aggrieved by any agency action resulting in reduction, discontinuance or termination of assistance.

1301.3 Requests for Hearing

A request for hearing is defined as a clear written or oral expression by the applicant or applicant's authorized representative of the desire to appear before a higher authority. Requests for a hearing must be forwarded in writing within two (2) work days to the State of Georgia Department Legal Services Office (LSO), 2 Peachtree St., Atlanta, GA 30303-3142 or via fax at (404) 657-1123 and is effective upon receipt by the entity or LSO.

A hearing may be requested for the following reasons:

- Application for assistance is denied
- Application is not acted upon within a reasonable period of time
- Applicant is aggrieved by any agency action resulting in reduction, discontinuance or termination of assistance.