

**TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS
TDHCA Governing Board Approved Draft of
2024-2025 Community Services Block Grant (CSBG) State Plan**

Disclaimer

Attached is a draft of the 2024-2025 Community Services Block Grant (CSBG) State Plan that was approved by the TDHCA Governing Board on April 13, 2023.

Summary of the Document and the Changes Proposed: Every two years a CSBG State Plan is submitted to the U.S. Department of Health and Human Services for approval to receive CSBG funding for Texas so that eligible low income Texans may receive a variety of direct services. This is a draft of the Plan which is released for public comment. Changes to the Plan include revising language to answer the questions within the Plan more clearly, revising language within the Plan to align with the Texas Administrative Code, updating changes to CSBG Eligible Entities, revising Discretionary fund program allocations, creating a Reentry program with Discretionary funds, date changes and grammatical/spelling error corrections.

In compliance with Texas Government Code, §2001.023(c), a summary of the proposed document is provided above. Also in compliance with Texas Government Code, §2001.023(c), this cover sheet and summary are provided in both English and Spanish.

Public Comment

**Public Comment Period: Starts: 8AM Central time on April 28, 2023
Ends: 5PM Central time on May 22, 2023**

Comments received after 5PM Central time on May 22, 2023, will not be accepted.

Written comments may be submitted, in hard copy or electronic format to:

Texas Department of Housing and Community Affairs
Attn: Gavin Reid
P.O. Box 13941
Austin, Texas 78711-3941
Email: gavin.reid@tdhca.state.tx.us

Written comments may be submitted in hard copy or email format within the designated public comment period. Those making public comment are encouraged to reference the specific draft rule, policy, or plan related to their comment as well as a specific reference or cite associated with each comment.

Please be aware that all comments submitted to the TDHCA will be considered public information.

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS
Street Address: 221 East 11th Street, Austin, TX 78701
Mailing Address: PO Box 13941, Austin, TX 78711-3941
Main Number: 512-475-3800 Toll Free: 1-800-525-0657
Email: info@tdhca.state.tx.us Web: www.tdhca.state.tx.us

DEPARTAMENTO DE VIVIENDA Y ASUNTOS COMUNITARIOS DE TEXAS (TDHCA)

Borrador aprobado por la Junta Directiva del TDHCA

del Plan Estatal para el Año Fiscal Federal 2024-2025 del Community Services Block Grant

Se adjunta un borrador del Plan Estatal para el Año Fiscal Federal 2024-2025 del Community Services Block Grant, que fue aprobado por la Junta Directiva del TDHCA el 13 de abril de 2023. Este es un borrador del Plan que se publica para comentarios públicos. Los cambios al Plan incluyen revisar el lenguaje para responder las preguntas dentro del Plan con mayor claridad, revisar el lenguaje dentro del Plan para alinearlo con el Código Administrativo de Texas, actualizar los cambios en las Entidades Elegibles de CSBG, revisar las asignaciones del programa de fondos discrecionales, crear un programa de reingreso con fondos discrecionales, cambios de fecha y correcciones de errores gramaticales / ortográficos.

De conformidad con la sección [§] 2001.023(c) del Código de Gobierno de Texas, anteriormente se facilita un resumen del documento propuesto. Asimismo, en cumplimiento con la sección [§] 2001.023(c) del Código de Gobierno de Texas, esta portada y resumen se ofrecen tanto en inglés como en español.

Comentarios del público

Periodo de comentarios del público: Inicio: 8:00 a. m., hora local de Austin, del 28 de abril de 2023

Fin: 5:00 p. m., hora local de Austin, del 22 de mayo de 2023

No se aceptarán los comentarios que se reciban después de las 5:00 p. m., hora local de Austin, del 22 de mayo de 2023.

Los comentarios por escrito pueden presentarse en formatos impreso, fax o electrónico a:

Departamento de Vivienda y Asuntos Comunitarios de Texas
A la atención de: Gavin Reid
P.O. Box 13941
Austin, Texas 78711-3941
Correo electrónico: gavin.reid@tdhca.state.tx.us

Los comentarios por escrito pueden presentarse en formato impreso o por correo electrónico dentro del período designado de comentarios del público. Se anima a quienes formulen comentarios públicos a que hagan referencia al borrador de la norma, política o plan específico relacionado con su comentario, así como una referencia o cita específica asociada a cada comentario.

Tenga en cuenta que todos los comentarios enviados al TDHCA se considerarán información pública.

DEPARTAMENTO DE VIVIENDA Y ASUNTOS COMUNITARIOS DE TEXAS

Dirección: 221 East 11th Street, Austin, TX 78701
Dirección postal: P.O. Box 13941, Austin, TX 78711-3941
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Correo electrónico: info@tdhca.state.tx.us Web: www.tdhca.state.tx.us

STATE OF TEXAS FFY 202~~4~~2 and FFY 202~~5~~3
COMMUNITY SERVICES BLOCK GRANT APPLICATION
AND STATE PLAN

To be Submitted to
U. S. DEPARTMENT OF HEALTH AND HUMAN SERVICES

August 202~~3~~1

by the

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

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SECTION 1

CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter

1.1. Provide the following information in relation to the lead agency designated to administer CSBG in the State, as required by Section 676(a) of the CSBG Act. The following information should mirror the information provided on the Application for Federal Assistance, SF-424M.

1.1a. Lead agency [**Texas Department of Housing and Community Affairs**]

1.1b. Cabinet or administrative department of this lead agency [**Check One and narrative where applicable**]

- Community Services Department
- Human Services Department
- Social Services Department
- Governor's Office
- Community Affairs Department
- Other, describe:

1.1c. Division, bureau, or office of the CSBG authorized official [**Community Affairs Division**]

1.1d. Authorized official of the lead agency [**Mr. Bobby Wilkinson, Executive Director**]

Instructional note: The authorized official could be the director, secretary, commissioner etc. as assigned in the designation letter (attached under item 1.3). The authorized official is the person indicated as authorized representative on the SF-424M.

1.1e. Street address [**221 East 11th Street**]

1.1f. City [**Austin**]

1.1g. State [**Texas**]

1.1h. Zip [**78701**]

1.1i. Telephone number and extension [**512-475-3800**]

1.1j. Fax number [**512-475-3935**]

1.1k. Email address [**bobby.wilkinson@tdhca.state.tx.us**]

1.1. Lead agency website [www.tdhca.state.tx.us]

1.2. Provide the following information in relation to the designated State CSBG point of contact.

Instructional Note: The State CSBG point of contact should be the person that will be the main point of contact for CSBG within the State.

1.2a. Agency name [**Texas Department of Housing and Community Affairs**]

1.2b. Name of the point of contact [**Michael DeYoung**]

1.2c. Street address [**221 East 11th Street**]

1.2d. City [**Austin**]

1.2e. State [**Texas**]

1.2f. Zip [**78701**]

1.2g. Point of contact telephone number [**512-475-2125**]

1.2h. Fax number [**512-475-3935**]

1.2i. Point of contact email address [michael.deyoung@tdhca.state.tx.us]

1.2j. Point of contact agency website [www.tdhca.state.tx.us]

1.3. Designation Letter: Attach the State's official CSBG designation letter. If either the governor or designated agency has changed, update the letter accordingly. [**Attach a document**]

Instructional Note: The letter should be from the chief executive officer of the State and include, at minimum, the designated State CSBG lead agency and title of the authorized official of the lead agency who is to administer the CSBG grant award.

Per state law, programmatic designations to a State Agency from the Governor remain in effect unless rescinded.

SECTION 2

State Legislation and Regulation

- 2.1. **CSBG State Legislation:** Does the State have a statute authorizing CSBG?
Yes No
- 2.2. **CSBG State Regulation:** Does the State have regulations for CSBG?
Yes No

2.3. If yes was selected in item 2.1 or 2.2, attach a copy (or copies) of legislation and/or regulations or provide a hyperlink(s), as appropriate. **[Attach a document and/or provide a link] Link:**

Texas Government Code, Section 2105:

<http://www.statutes.legis.state.tx.us/Docs/GV/htm/GV.2105.htm>

Texas Government Code, Section 2306.092 and 2306.097:

<http://www.statutes.legis.state.tx.us/Docs/GV/htm/GV.2306.htm>

Texas Administrative Code, 10 TAC, Chapter 1:

[https://texreg.sos.state.tx.us/public/readtac\\$ext.ViewTAC?tac_view=4&ti=10&pt=1&ch=1](https://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=4&ti=10&pt=1&ch=1)

Texas Administrative Code, 10 TAC, Chapter 2:

[http://texreg.sos.state.tx.us/public/readtac\\$ext.ViewTAC?tac_view=4&ti=10&pt=1&ch=2](http://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=4&ti=10&pt=1&ch=2)

Texas Administrative Code, 10 TAC, Chapter 6, Subchapter A:

[http://texreg.sos.state.tx.us/public/readtac\\$ext.ViewTAC?tac_view=5&ti=10&pt=1&ch=6&sch=A&rl=Y](http://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=5&ti=10&pt=1&ch=6&sch=A&rl=Y)

Texas Administrative Code, 10 TAC, Chapter 6, Subchapter B:

[http://texreg.sos.state.tx.us/public/readtac\\$ext.ViewTAC?tac_view=5&ti=10&pt=1&ch=6&sch=B&rl=Y](http://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=5&ti=10&pt=1&ch=6&sch=B&rl=Y)

Texas Grant Management Standards

<https://comptroller.texas.gov/purchasing/grant-management/>

2.4. State Authority: Select a response for each question about the State statute and/or regulations authorizing CSBG:

2.4a. Did the State legislature enact authorizing legislation, or amendments to an existing authorizing statute, last year?

Yes No

2.4b. Did the State establish or amend regulations for CSBG last year?

Yes No

2.4c. Does the State statutory or regulatory authority designate the bureau, division, or office in the State government that is to be the State administering agency?

Yes No

SECTION 3

State Plan Development and Statewide Goals

3.1. CSBG Lead Agency Mission and Responsibilities: Briefly describe the mission and responsibilities of the State agency that serves as the CSBG lead agency. **[Narrative:**

The mission of the Texas Department of Housing and Community Affairs is to administer its assigned programs efficiently, transparently, and lawfully and to invest its resources strategically and develop high quality affordable housing which helps Texas communities to thrive.

The Department accomplishes its mission largely by acting as a conduit for federal assistance for housing and community services. However, because several major housing programs require the participation of private investors and private lenders, TDHCA also operates as a housing finance agency.

Ensuring compliance with the many state and federal laws that govern housing programs is another important part of the Department's mission. This ensures that TDHCA's housing portfolio is being well maintained and correctly operated, that program funds are being compliantly and effectively administered, and that any misuse of those resources is identified and addressed.

TDHCA, chiefly through its community action network, provides important services to Texans who qualify based on their income level and, through its subrecipients provides affordable housing assistance as well. The Department offers educational materials and technical assistance for housing, housing-related, and community services matters statewide.]

3.2. State Plan Goals: Describe the State’s CSBG-specific goals for State administration of CSBG under this State Plan. **[Narrative:** The Agency’s Strategic Plan for Fiscal Years 2019-2023 includes the following measures related to CSBG:

Objective: To ease the hardship of poverty for 16% ~~8-89~~ percent of the homeless and very low income persons each year.

Strategy 1: Administer poverty-related funds through a Network of Agencies.

Output Measures:

1. Number of persons assisted through Homeless and Poverty-related funds (Note: this includes CSBG and other grants)
2. Number of persons assisted that achieve incomes s above poverty level
3. Number of persons assisted by the Community Services Block Grant Program]

Instructional Note: For examples of “goals,” see State Accountability Measure 1Sa(i).

Note: This information is associated with State Accountability Measure 1Sa(i) and may pre-populate the State’s annual report form.

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

3.3a. Analysis of [Check all that applies and narrative where applicable]

- State Performance Indicators and/or National Performance Indicators (NPIs)
- U.S. Census data
- State performance management data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)
- Other data (describe) **[Narrative, 2500 characters]**
- Eligible entity community needs assessments
- Eligible entity plans
- Other information from eligible entities, e.g., State required reports (describe)
[Narrative, 2500 characters]

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

- Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)
- State community action association and regional CSBG T & TA providers
- State partners and/or stakeholders (describe) **[Narrative:** The Department invites consultation with partners and stakeholders through our Executive Board Meeting, intra-agency councils, workgroups, and public hearings. State employees also attend state association conferences and Board meetings.]

- National organizations (describe) [Narrative, 2500 characters]
- Other (describe) [Narrative, 2500 characters]

3.4. Eligible Entity Involvement

3.4a. Describe the specific steps the State took in developing the State Plan to involve the eligible entities. [Narrative: Prior to the development of the State Plan, the Department sent an e-mail to the eligible entities and the State Association to offer an initial opportunity to provide comments on the plan ~~and offered to convene a conference call to discuss specific sections they had an interest in discussing. No comments were received.~~ Additionally, the State included CSBG eligible entities and the State Association in the development of the Plan and the use of CSBG funds by providing the eligible entities and the State Association with the draft Plan prior to presenting it to the TDHCA Governing Board. ~~No comments were received.~~ The plan was then presented to the Department’s Board so that it could be released as the draft Plan for an official public comment period ~~lasting 30 days.~~ This period provided the eligible entities and the State Association with a third opportunity to comment on the Plan. There were also ~~four~~ two separate ~~virtual~~ public hearings held, ~~one~~ two during business hours and ~~one~~ two after business hours to provide input to the Plan.]

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

If this is the first year filling out the automated State Plan, skip the following question.

3.4b. Performance Management Adjustment: How has the State adjusted State Plan development procedures under this State Plan, as compared to past plans, in order 1) to encourage eligible entity participation and 2) to ensure the State Plan reflects input from eligible entities? Any adjustment should be based on the State’s analysis of past performance in these areas, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any adjustments, provide further detail.

[The State thoroughly reviewed the results of the most recent ACSI 2019 Survey in developing the Plan. One of the areas of feedback was that eligible entities asked to be able to provide input on the CSBG State Plan prior to the draft being released. In response to that suggestion, prior to beginning revisions, Department sent an e-mail to the eligible entities and the State Association to offer an initial opportunity to provide comments on the plan ~~and offered to convene a conference call to discuss specific sections they had an interest in discussing.~~ The network of eligible entities also requested that the draft Plan be provided to them prior to publication showing the tracked changes and the Department has done so. The State also released a copy of the draft Plan to garner input prior to it being approved by the Board and released for public comment. The State continues to

consider the input in the development of training and technical assistance in the areas of development of the Community Needs Assessment and the implementation of ROMA Next Generation. Other input in the ~~2019~~ most recent ACSI Survey related to concerns over a lack of coordination with the Department's Compliance Division and the Community Affairs Division Training Section. The two sections are aware of these concerns and continuously strive to communicate and coordinate their communications and guidance to the network to ensure consistent interpretation of state and federal regulations. The State will continue to utilize input from the Network throughout the period covered by this Plan.]

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

- 3.5. Eligible Entity Overall Satisfaction:** Provide the State's target for eligible entity Overall Satisfaction during the performance period: [~~7362~~]

Instructional Note: The State's target score will indicate improvement or maintenance of the States' Overall Satisfaction score from the most recent American Customer Survey Index (ACSI) survey of the State's eligible entities. (See information about the ACSI in the CSBG State Accountability Measures document.)

Note: Item 3.5 is associated with State Accountability Measure 8S and may pre-populate the State's annual report form.

SECTION 4

CSBG Hearing Requirements

- 4.1. Public Inspection:** Describe how the State made this State Plan, or revision(s) to the State Plan, available for public inspection, as required under Section 676(e)(2) of the Act. [**Narrative:** The Draft Application and State Plan was made available for review at the April ~~13-8~~, 202~~31~~, meeting of the TDHCA Governing Board. Subsequently, a public comment period occurred from April ~~283~~, 202~~31~~, through May ~~224~~, 202~~31~~, whereby input into the Plan could be provided. The State held ~~two virtual public hearings with one occurring four public hearings, two~~ during business hours and ~~two~~ after business hours. The draft Plan was also posted on the Department's website on April ~~179~~, 202~~31~~, and a link to the website posting was published in the *Texas Register* on April ~~283~~, 202~~31~~. Both the Department's website and the *Texas Register* publication announced the public comment period and the public hearing information.]
- 4.2. Public Notice/Hearing:** Describe how the State ensured there was sufficient time and statewide distribution of notice of the public hearing(s) to allow the public to comment on the State Plan, as required under 676(a)(2)(B) of the CSBG Act. [**Narrative:** The State posted notice of the public hearings and the ~~30 day~~ public comment period on the

Department’s website April ~~179~~, 202~~13~~. CSBG eligible entities and the State Association were also notified by e-mail that same day. Notice of Public Hearings and the Public Comment period were also published in the *Texas Register* on April ~~283~~, 202~~31~~.]

4.3. Public and Legislative Hearings: Specify the date(s) and location(s) of the public and legislative hearing(s) held by the designated lead agency for this State Plan, as required under Section 676(a)(2)(B) and Section 676(a)(3) of the Act. (If the State has not held a public hearing in the prior fiscal year and/or a legislative hearing in the last three years, provide further detail).

Instructional Note: The date(s) for the public hearing(s) must have occurred in the year prior to the first Federal fiscal year covered by this plan. Legislative hearings are held at least every three years, and must have occurred within the last three years prior to the first Federal fiscal year covered by this plan.

~~Public Hearings:~~

- ~~• Wednesday, May 12, 2021, 2:00 p.m. virtual hearing~~
- ~~• Thursday, May 13, 2021, 6:00 p.m. virtual hearing~~

~~Legislative Hearings:~~

~~House Committee on Appropriations, Monday, March 1, 2021, Texas State Capitol, Austin, Texas~~
~~Senate Committee on Finance, Tuesday, March 2, 2021, Texas State Capitol, Austin, Texas~~

Date	Location	Type of Hearing [Select an option]
<p>Legislative Hearings: House Appropriations Committee on February 21, 2023 at 8:00 a.m. Monday, March 1, 2021 at 9:00 a.m. Senate Committee on Finance on February 14, 2023 at 9:00 a.m. Tuesday, March 2, 2021</p>	<p>Texas House of Representatives House Appropriations Committee Meeting Texas State Capitol, Room E1.104<u>E2.026</u> Austin, Texas</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Public <input checked="" type="checkbox"/> Legislative <input type="checkbox"/> Combined

Date	Location	Type of Hearing [Select an option]
	Texas Senate Senate Finance Committee Meeting Texas State Capitol, Room E1.036 Austin, Texas	
Public Hearings: <u>Tuesday, May 9, 2023 at 5:30 p.m.-6:00 p.m.</u> <u>Thursday, May 11, 2023 at 1:30-2:00 p.m.</u> <u>Thursday, May 11, 2023 at 10:00 a.m.- 10:30 a.m.</u> <u>Thursday, May 11, 2023 at 5:30-6:00 p.m.</u>	<u>Rusk building</u> <u>208 E. 10th Street, room #320</u> <u>Austin, TX 78701</u> <u>BakerRipley</u> <u>3838 Aberdeen Way</u> <u>Houston, Texas 77025</u> <u>First Floor Education Center</u> <u>The Andrew “Doc” Session Community</u> <u>Center</u> <u>201 S. Sylvania Avenue</u> <u>Fort Worth 76111</u> <u>West Texas Opportunities</u> <u>1415 East 2nd</u> <u>Odessa, TX 79761</u> Virtual hearings via GoToWebinar Join meeting from your computer, tablet or smartphone. For the May 12, 2021 hearing: Register at You can also dial in using your phone. United States: +1 (562) 247-8422 (Persons using the dial in number and access code without registering online will only be able to hear the hearing and will not be able to provide	<ul style="list-style-type: none"> • <input checked="" type="checkbox"/> Public • <input type="checkbox"/> Legislative • <input type="checkbox"/> Combined

Date	Location	Type of Hearing [Select an option]
<p>Wednesday, May 12, 2021, 2:00 p.m.</p> <p>Thursday, May 13, 2021, 6:00 p.m.</p>	<p>comment) Access Code: 267-578-547</p> <p>For the May 13, 2021, hearing: Register at</p> <p>You can also dial in using your phone. United States: +1 (415) 655-0052 (Persons using the dial in number and access code without registering online will only be able to hear the hearing and will not be able to provide comment) Access Code: 990-433-162</p>	

ADD a ROW function Note: rows will be able to be added for each additional hearing

4.4. Attach supporting documentation or a hyperlink for the public and legislative hearings.
[Attach a document or provide a hyperlink.]

Texas Register Notice:

~~TBD~~<https://www.sos.texas.gov/texreg/archive/April232021/In%20Addition/In%20Addition.htm#154>

Legislative hearing documentation attached.

SECTION 5

CSBG Eligible Entities

5.1. CSBG Eligible Entities: In the table below, list each eligible entity in the State, and indicate public or private, the type(s) of entity, and the geographical area served by the entity. (This table should include every CSBG Eligible Entity to which the State plans to allocate 90 percent funds, as indicated in the table in item 7.2. Do not include entities that only receive remainder/discretionary funds from the State or tribes/tribal organizations that receive direct funding from OCS under Section 677 of the CSBG Act.)

	CSBG Eligible Entity	Public or Nonprofit	Type of Agency	CSBG Counties Served
1	Aspermont Small Business Development Center, Inc.	Nonprofit	CAA	Haskell, Jones, Kent, Knox, Stonewall, Throckmorton
2	Austin, City of, Health and Human Services Department	Public	Local Government	Travis
3	Big Bend Community Action Committee, Inc.	Nonprofit	CAA	Brewster, Culberson, Hudspeth, Jeff Davis, Presidio
4	Brazos Valley Community Action Programs	Nonprofit	CAA	Brazos, Burleson, Chambers, Grimes, Leon, Liberty, Madison, Montgomery, Robertson, Walker, Waller, Washington
5	Cameron and Willacy Counties Community Projects, Inc.	Nonprofit	CAA	Cameron, Willacy
6	Central Texas Opportunities, Inc.	Nonprofit	CAA	Brown, Callahan, Coleman, Comanche, Eastland, McCulloch, Runnels
7	Combined Community Action, Inc.	Nonprofit	CAA	Austin, Bastrop, Colorado, Fayette, Lee, <u>Fort Bend, Wharton</u>
8	Community Action Committee of Victoria, Texas	Nonprofit	CAA	Aransas, Calhoun, De Witt, Goliad, Gonzales, Jackson, Lavaca, Refugio, Victoria
9	Community Action Corporation of South Texas	Nonprofit	CAA	Bee, Brooks, Duval, Jim Wells, Kenedy, Kleberg, San Patricio
10	Community Action Inc. of Central Texas	Nonprofit	CAA	Blanco, Caldwell, Hays
11	Community Action Social Services & Education	Nonprofit	CAA	Maverick

	CSBG Eligible Entity	Public or Nonprofit	Type of Agency	CSBG Counties Served
12	Community Council of South Central Texas, Inc.	Nonprofit	CAA	Atascosa, Bandera, Comal, Dimmit, Edwards, Frio, Gillespie, Guadalupe, Karnes, Kendall, Kerr, Kinney, LaSalle, Live Oak, McMullen, Medina, Real, Uvalde, Val Verde, Wilson, Zavala
13	Community Services of Northeast Texas, Inc.	Nonprofit	CAA	Bowie, Camp .Cass, Delta, Franklin, Hopkins, Lamar, Marion, Morris, Rains, Red River, Titus
14	Community Services, Inc.	Nonprofit	CAA	Anderson, Collin, Denton, Ellis, Henderson, Hunt, Kaufman, Navarro, Rockwall, Van Zandt
15	Concho Valley Community Action Agency	Nonprofit	CAA	Coke, Concho, Crockett, Irion, Kimble, Menard, Reagan, Schleicher, Sterling, Sutton, Tom Green
16	Community Council of Greater Dallas	Nonprofit	CAA	Dallas
17	Economic Action Committee of the Gulf Coast	Nonprofit	CAA	Matagorda
18	Economic Opportunities Advancement Corporation of Planning Region XI	Nonprofit	CAA	Bosque, Falls, Freestone, Hill, Limestone, McLennan
19	El Paso Community Action Program-Project BRAVO	Nonprofit	CAA	El Paso
20	Fort Worth, City of, Neighborhood Services Department	Public	Local Government	Tarrant
21	***Galveston County Community Action Council, Inc.	Nonprofit	CAA	Brazoria, Fort Bend, Galveston, Wharton
212	Greater East Texas Community Action Program	Nonprofit	CAA	Angelina, Cherokee, Gregg, Houston, Nacogdoches, Polk, Rusk, San Jacinto, Smith, Trinity, Wood
223	Gulf Coast Community Services Association	Nonprofit	CAA	Harris, Brazoria, Galveston
234	Hidalgo County Community Services Agency	Public	Local Government	Hidalgo
245	Hill Country Community Action Association, Inc.	Nonprofit	CAA	Bell, Coryell, Hamilton, Lampasas, Llano, Mason, Milam, Mills, San Saba

	CSBG Eligible Entity	Public or Nonprofit	Type of Agency	CSBG Counties Served
256	Lubbock, City of, Community Development Department <u>Guadalupe Economic Services Corporation</u>	Public <u>Nonprofit</u>	Local Government <u>CAA</u>	Lubbock
267	Nueces County Community Action Agency	Nonprofit	CAA	Nueces
278	Panhandle Community Services	Nonprofit	CAA	Armstrong, Briscoe, Carson, Castro, Childress, Collingsworth, Dallum, Deaf Smith, Donley, Gray, Hall, Hansford, Hartley, Hemphill, Hutchinson, Lipscomb, Moore, Ochiltree, Oldham, Parmer, Potter, Randall, Roberts, Sherman, Swisher, Wheeler
289	Pecos County Community Action Agency	Nonprofit	CAA	Crane, Pecos, Terrell
3029	Rolling Plains Management Corporation	Nonprofit	CAA	Archer, Baylor, Clay, Cottle, Foard, Hardeman, Jack, Mitchell, Montague, Taylor, Shackelford, Stephens, Wichita, Wilbarger, Young
304	San Antonio, City of, Department of Community Initiatives	Public	Local Government	Bexar
312	South Plains Community Action Association, Inc.	Nonprofit	CAA	Bailey, Cochran, Crosby, Dickens, Floyd, Garza, Hale, Hockley, King, Lamb, Lynn, Motley, Terry, Yoakum
323	South Texas Development Council	Public	Local Government	Jim Hogg, Starr, Zapata
334	Southeast Texas Regional Planning Commission	Public	Local Government	Hardin, Jefferson, Orange
345	Texas Neighborhood Services	Nonprofit	CAA	Erath, Hood, Johnson, Palo Pinto, Parker, Somervell, Wise
356	Texoma Council of Governments	Public	Local Government	Cooke, Fannin, Grayson
367	Tri-County Community Action, Inc.	Nonprofit	CAA	Harrison, Jasper, Newton, Panola, Sabine, San Augustine, Shelby, Tyler, Upshur
378	Webb County Community Action Agency	Public	Local Government	Webb
389	West Texas Opportunities, Inc.		CAA	Andrews, Borden, Dawson, Ector, Fisher, Gaines, Glasscock,

	CSBG Eligible Entity	Public or Nonprofit	Type of Agency	CSBG Counties Served
		Nonprofit		Howard, Loving, Martin, Midland, Nolan, Reeves, Scurry, Upton, Ward, Winkler
3940	Opportunities for Williamson and- Burnet Counties y Opportunities, Inc.	Nonprofit	CAA	Burnet, Williamson

5.2. Total number of CSBG eligible entities: 3940 [This will automatically update based on chart in 5.1]

5.3. **Changes to Eligible Entities List:** Has the list of eligible entities under item 5.1 changed since the State’s last State Plan submission? If yes, briefly describe the changes.

Yes No [If yes is selected – Narrative: On March 11, 2021, TDHCA Board of Directors voted to remove the eligible entity status of Galveston County Community Action Council, Inc (GCCAC). The ~~Department went through the IM 116 process is ongoing to de-designate and~~ GCCAC ~~as will remain~~ an eligible entity in 2022. GCCAC’s four-county service area was divided among two existing eligible entities (Combined Community Action and Gulf Coast Community Services Association) through a competitive application process and were approved by the Governor of Texas on August 17, 2022. until the process to terminate organizational eligibility is completed. Additionally, City of Lubbock Community Development relinquished their CSBG Eligible Entity status in 2022 and was replaced by Guadalupe Economic Services Corporation through a competitive application process and approved by the Governor of Texas on December 22, 2022.]

Instructional Note: Limited Purpose Agency refers to an eligible entity that was designated as a limited purpose agency under title II of the Economic Opportunity Act of 1964 for fiscal year 1981, that served the general purposes of a community action agency under title II of the Economic Opportunity Act, that did not lose its designation as a limited purpose agency under title II of the Economic Opportunity Act as a result of failure to comply with that Act and that has not lost its designation as an eligible entity under the CSBG Act.

Instructional Note: 90 percent funds are the funds a State provides to eligible entities to carry out the purposes of the CSBG Act, as described under Section 675C of the CSBG Act. A State must provide “no less than 90 percent” of their CSBG allocation, under Section 675B, to the eligible entities.

SECTION 6

Organizational Standards for Eligible Entities

Note: Reference IM 138, *State Establishment of Organizational Standards for CSBG Eligible Entities*, for more information on Organizational Standards. Click [HERE](#) for IM 138.

- 6.1. Choice of Standards:** Check the box that applies. If using alternative standards, a) attach the complete list of alternative organizational standards, b) describe the reasons for using alternative standards, and c) describe how the standards are at least as rigorous as the COE-developed standards.

The State will use the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138)

The State will use an alternative set of organizational standards **[Attach supporting documentation if this option is selected]**

- 6.2.** If the State is using the COE-developed organizational standards, does the State propose making a minor modification to the standards, as described in IM 138? Yes

No

- 6.2a.** If yes was selected in item 6.2, describe the State's proposed minor modification to the COE-developed organizational standards, and provide a rationale.

[The state has administrative rules, the Texas Administrative Code (TAC), to address state requirements and implemented the organizational standards under the TAC. The rule was put into place in January 2016 as amended by January 1, 2023. Minor modifications to the TAC included the state law requirement that eligible entities follow the Texas Grant Management Standards and the State of Texas Single Audit Circular, unless there has been a federal preemption. Additionally, where the word bylaws is used the Department has modified the standards to read Certificate of Formation/Articles of Incorporation or bylaws, as needed to comply with state law.]

- 6.3.** How will/has the State officially adopt(ed) organizational standards for eligible entities in the State in a manner consistent with the State's administrative procedures act? If "Other" is selected, provide a timeline and additional information, as necessary. **[Check all that applies and narrative where applicable]**

Regulation

Policy

Contracts with eligible entities

Other, describe: **[Narrative, 2500 characters]**

- 6.4.** How will the State assess eligible entities against organizational standards, as described in IM 138? **[Check all that apply]**

Peer-to-peer review (with validation by the State or State-authorized third party)

- Self-assessment (with validation by the State or State-authorized third party)
- Self-assessment/peer review with State risk analysis
- State-authorized third party validation
- Regular, on-site CSBG monitoring
- Other (desk and monitoring reviews)

6.4a. Describe the assessment process.

[Narrative:

The Texas Department of Housing and Community Affairs assesses eligible entities' compliance with organizational standards by using a software tool which allows eligible entities to upload documents to substantiate compliance with organizational standards. It allows eligible entities to upload documents throughout the federal fiscal year, except during the time period after the submission deadline has passed (i.e., September 30) at which time the Department reviews the documents to assess compliance. Eligible entities can log into their account and see which organizational standards they have met and not met and are sent any related comments via email.

The assessment of organizational standards occurs at the end of the federal fiscal year after which all eligible entities have uploaded their documentation showing compliance with each of the organizational standards. The Department notifies the network of eligible entities throughout the year of the deadline to upload documentation. If an eligible entity does not upload any documentation or the proper documentation by the deadline (i.e., September 30 of each year), then that entity will be placed in a "not met" category for the particular organizational standard. After the initial results of the assessment are provided to the eligible entities, they are provided a limited number of days to provide additional documentation to reverse a determination of "not met" organizational standards.

The Department places a high emphasis on Organizational Standards, and is available for technical assistance throughout the year. In the event that an entity does not meet a standard, the Department will determine whether that entity requires intensive technical assistance to meet the standard(s) and what other steps are necessary. Department staff will continue to provide technical assistance and, if necessary, develop a Technical Assistance Plan or Quality Improvement Plan with the entity until the standards have been met.]

6.5. Will the State make exceptions in applying the organizational standards for any eligible entities due to special circumstances or organizational characteristics, as described in IM 138? Yes No

6.5a. If yes was selected in item 6.5, list the specific eligible entities the State will exempt from meeting organizational standards, and provide a description and a justification for each exemption. **[Narrative, 2500 characters or attach document]**

If this is the first year filling out the automated State Plan, skip the following question.

6.6. Performance Target: What percentage of eligible entities in the State does the State expect will meet all the State-adopted organizational standards in the next year? **[Insert a percentage. ~~3550~~%]**

Note: This information is associated with State Accountability Measures 6Sa and may pre-populate the State's annual report form.

SECTION 7

State Use of Funds

Eligible Entity Allocation (90 Percent Funds) [Section 675C(a) of the CSBG Act]

7.1 Formula: Select the method (formula) that best describes the current practice for allocating CSBG funds to eligible entities. **[Check one and narrative where applicable]**

- Historic
- Base + Formula
- Formula Alone
- Formula with Variables
- Hold Harmless + Formula
- Other **[Narrative:** The Department distributes CSBG funds to CSBG eligible entities based on a distribution formula which incorporates the most recent U.S. Census Bureau Decennial Census and data from the American Community Survey (ACS) for information on persons at 125% of poverty; a \$50,000 base; a \$150,000 floor; 98% weighted factor for poverty population; and, a 2% weighted factor for the inverse ratio of population density. The formula is applied as follows: each eligible entity receives a base award; then, the weighted factors of poverty population and population density are applied to the state's balance of the 90% funds. If the base and application of the weighted factors do not yield sufficient funds for the minimum floor per entity, then the minimum floor amount is reserved for each of those CSBG eligible entities under the floor figure. Then, the formula is re-applied to the balance of the 90% funds for distributing the remaining funds to the remaining CSBG eligible entities. Following the use of the decennial Census data, then on a biennial basis, the Department will use the most recent ACS 5 year estimate data that is available. To the extent that there are significant reductions in CSBG funds received by the Department, the Department may revise the CSBG distribution formula through a rulemaking process.]

7.1a. Does the State statutory or regulatory authority specify the terms or formula for allocating the 90 percent funds among eligible entities? Yes No

7.2. Planned Allocation: Specify the planned allocation of 90 percent funds to eligible entities, as described under Section 675C(a) of the CSBG Act. The estimated allocations may be in dollars or percentages. For each eligible entity receiving funds, provide the Funding Amount in either dollars (columns 2 and 4) or percentage (columns 3 and 5) for the fiscal years covered by this plan.

The estimated allocations are based on FY 202~~2~~¹ CSBG funding levels.

	CSBG Eligible Entity	Estimated 2024² Allocation	Estimated 2025³ Allocation
1	Aspermont Small Business Development Center, Inc.	150,000	150,000
2	Big Bend Community Action Committee, Inc.	150,000	150,000
3	Brazos Valley Community Action Programs	1,1 52,29628,762	1,1 52,29628,762
4	Cameron and Willacy Counties Community Projects, Inc.	936,461955,800	9 55,80036,464
5	Central Texas Opportunities, Inc.	483,472186,384	18 6,3843,472
6	City of Austin Health and Human Services Department	1,1 18,394095,584	1,1 18,394095,584
7	City of Fort Worth Neighborhood Services Department	1,9 08,358868,682	1,9 08,358868,682
8	City of Lubbock Community Development Department	411,176	411,176
9 8	City of San Antonio Department of Community Initiatives	2,1 80,58235,095	2,1 80,58235,095
10 9	Combined Community Action, Inc.	671,171202,495	671,171202,495
11 10	Community Action Committee of Victoria, Texas	295,4 410,204	295,4 410,204
12 11	Community Action Corporation of South Texas	329,5 223,554	329,5 223,554
13 12	Community Action Inc. of Central Texas	299,0 433,726	299,0 433,726
14 13	Community Action Social Services and Education	150,000	150,000
15 14	Community Council of Greater Dallas	3,2 75,35906,498	3,2 75,35906,498
16 15	Community Council of South Central Texas, Inc.	767,3 9052,074	767,3 9052,074
17 16	Community Services of Northeast Texas, Inc.	439,4 581,143	439,4 581,143
18 17	Community Services, Inc.	1,6 00,628567,522	1,6 00,628567,522
19 18	Concho Valley Community Action Agency	232,19828,308	232,19828,308
20 19	Economic Action Committee of the Gulf Coast	150,000	150,000
21 20	Economic Opportunities Advancement Corporation of Planning Region XI	504,989495,275	504,989495,275
22 21	El Paso Community Action Program-Project BRAVO	1,2 67,69941,704	1,2 67,69941,704
23	Area serving Brazoria, Fort Bend, Galveston, and Wharton counties (currently Galveston County Community Action Council, Inc. — pending eligible entity termination proceedings)	987,241	987,241

	CSBG Eligible Entity	Estimated 20242⁴ Allocation	Estimated 20253⁵ Allocation
242 ²	Greater East Texas Community Action Program	965,996,464,439	965,996,464,439
23 ³	<u>Guadalupe Economic Services Corporation</u>	419,055	419,055
245 ⁵	Gulf Coast Community Services Association	5,789,828,436,525	5,789,828,436,525
256 ⁶	Hidalgo County Community Services Agency	1,800,796,763,417	1,800,796,763,417
267 ⁷	Hill Country Community Action Association, Inc.	541,011,30,528	541,011,30,528
278 ⁸	Nueces County Community Action Agency	457,481,48,784	457,481,48,784
289 ⁹	Panhandle Community Services	583,428,72,039	582,428,72,039
293 ⁰	Pecos County Community Action Agency	150,000	150,000
301 ¹	Rolling Plains Management Corporation	481,318,72,109	481,318,72,109
312 ²	South Plains Community Action Association, Inc.	268,258,3,599	268,258,3,599
323 ³	South Texas Development Council	235,468,1,508	235,468,1,508
334 ⁴	Southeast Texas Regional Planning Commission	492,291,82,848	492,291,82,848
345 ⁵	Texas Neighborhood Services	471,634,62,632	471,634,62,632
356 ⁶	Texoma Council of Governments	250,185,45,911	250,185,45,911
367 ⁷	Tri-County Community Action, Inc.	337,606,1,466	337,606,1,466
378 ⁸	Webb County Community Action Agency	601,704,589,926	601,704,589,926
389 ⁹	West Texas Opportunities, Inc.	592,280,80,703	592,280,80,703
394 ⁰	<u>Opportunities for Williamson and-Burnet Countiesy Opportunities, Inc.</u>	340,543,34,340	340,543,34,340
	Total	32,894,3211,921,744	32,894,3211,921,744

7.3. Distribution Process: Describe the specific steps in the State’s process for distributing 90 percent funds to the eligible entities and include the number of days each step is expected to take; include information about State legislative approval or other types of administrative approval (such as approval by a board or commission). **[Narrative:** The

Texas State Legislature meets biennially during which time the budgets of all state agencies are considered. The CSBG budget is included in the review and appropriation of the Department's overall budget.

Prior to obtaining approval from its Governing Board to release funding contracts, the Department conducts an internal approval process of the individual funding contracts for the eligible entities. After approval, the Department posts an agenda seven days prior to a monthly Board meeting to include an item seeking approval of the CSBG State Plan, which includes obtaining Board approval to release funding contracts to the eligible entities. The Department distributes funding utilizing an electronic contract and reporting system. Upon receipt of Notice of Grant Award from USHHS, the Department generates contracts to allocate the 90% pass-through funding to the CSBG eligible entities. This process can take up to 30 days.]

7.4. Distribution Timeframe: Does the State plan to make funds available to eligible entities no later than 30 calendar days after OCS distributes the Federal award?

Yes No

7.4a. If no, describe State procedures to ensure funds are made available to eligible entities consistently and without interruption. **[Narrative:** The Department will make the funds available within 30 calendar days after Federal and State authority was provided, with the exception of the 1st quarter because of the State's CSBG contract year beginning January 1st.]

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

If this is the first year filling out the automated State Plan, skip the following question.

7.5. Performance Management Adjustment: How is the State improving grant and/or contract administration procedures under this State Plan as compared to past plans? Any improvements should be based on analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any improvements, provide further detail. **[Narrative:** Because of feedback in the past from the network of eligible entities (e.g., most recent ACSI Survey), and an analysis of internal standard operating procedures, the State strives to improve its internal contract administration process and legal Department review process to ensure that the CSBG contracts are executed prior to the start date of the contract year. The State is always open to input from the network regarding its contract administration process.]

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

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

- 7.6. What amount of State CSBG funds does the State plan to allocate for administrative activities, under this State Plan? The estimate may be in dollars or a percentage. [5%]
- 7.7. How many State staff positions will be funded in whole or in part with CSBG funds under this State Plan? [12.950]
- 7.8. How many State Full Time Equivalents (FTEs) will be funded with CSBG funds under this State Plan? [12.9approximately 11.1]

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

- 7.9. Does the State have remainder/discretionary funds? Yes No

If yes was selected, describe how the State plans to use remainder/discretionary funds in the table below.

Note: This response will link to the corresponding assurance, item 14.2.

Instructional Note: The assurance under 676(b)(2) of the Act (item 14.2 of this State Plan) specifically requires a description of how the State intends to use remainder/discretionary funds to “support innovative community and neighborhood-based initiatives related to the purposes of [the CSBG Act].” Include this description in row “f” of the table below and/or attach the information.

If a funded activity fits under more than one category in the table, allocate the funds among the categories. For example, if the State provides funds under a contract with the State Community Action Association to provide training and technical assistance to eligible entities and to create a statewide data system, the funds for that contract should be allocated appropriately between row a and row c. If allocation is not possible, the State may allocate the funds to the main category with which the activity is associated.

Note: This information is associated with State Accountability Measures 3Sa; the responses may pre-populate the State’s annual report form.

Remainder of Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Year One Planned \$	Year One Planned %	Year Two Planned \$	Year Two Planned %	Brief description of services/activities
a. Training and Technical Assistance	\$150,000	8.57%	\$150,000	8.57%	T&TA provided by staff or an outsourced provider in areas such as ROMA, Org Standards, Case Management, Board, Reporting, community action

Remainder of Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Year One Planned \$	Year One Planned %	Year Two Planned \$	Year Two Planned %	Brief description of services/activities
					plans, needs assessments, strategic planning, data analysis, and other areas as requested.
b. Coordination of State-operated programs and/or local programs	\$0		\$0		
c. Statewide coordination and communication among eligible entities	\$0		\$0		
d. Analysis of distribution of CSBG funds to determine if targeting greatest need	\$0		\$0		
e. Asset building programs	\$0		\$0		
f. Innovative programs/activities by eligible entities or other neighborhood groups	\$0		\$0		
g. State charity tax credits	\$0		\$0		
h. Other activities specify (see below for details)	\$1,600 <u>25</u> ,000	91.43%	\$1,600 <u>25</u> ,000	91.43%	See notes below
Totals	\$1,750 <u>75</u> ,000	100%	\$1,750 <u>75</u> ,000	100%	

h. Other Activities. Specify: The planned uses may change as directed by the Governing Board. Expected uses: 1) \$~~205~~0,000 towards Organizational Capacity Improvements to assist eligible entities in improving their organizational performance including, but not limited to, efforts to meet organizational standards such as the development of Community Needs Assessments and Strategic Plans, staff compensation to attract qualified employees and reduce turnover, training for staff to become certified ROMA trainers, equipment, software, or repairs); 2) \$~~554~~0,000 towards a Re-Entry Assistance Program which will allow nonprofit and local government

~~organizations with established experience in serving the reentry population, to assist previously incarcerated individuals obtain rental housing through landlord incentives, security deposits and other reentry activities related to housing. Direct Client Assistance which can go to activities including, but not limited to, assisting eligible clients with obtaining job-associated uniforms and training, direct educational expenses (e.g., tuition, textbooks, etc.), the cost of transportation to and from work and other necessary functions, and the cost of certain health care needs;~~ 3) 1050,000 towards the provision of training and technical assistance services through an outside provider to assess eligible entity operations and provide training and technical assistance ; 4) \$50,000 towards a Network Transition Fund which helps CSBG eligible entities with transitional expenses when they absorb other CSBG services areas; 5) \$300,000 towards Migrant Seasonal Farm Worker and Native American Populations Employment and Education Initiatives; 6) \$1250,000 towards the Housing Voucher Program Support Fund ; 7) \$15500,000 towards a Disaster Recovery Fund ; and 8) \$75,000 towards the provision of training and technical assistance related to homelessness in the Balance of State Continuum of Care and related statewide homelessness initiatives.

As a result of this State Plan being approved by the TDHCA Governing Board, the Requests for Applications and awards for the Organizational Capacity Improvements ~~and Direct Client Assistance activities~~ will be released by Department staff without further Board approval.

If any of the categories above are not fully expended during the contract term the Department may reprogram the unexpended funds to other discretionary categories that it determines are best suited to receive the funds at the time or to the network of eligible entities to be used for CSBG eligible activities.

If funding to the State from HHS is less than projected in the first or second year, the reduced amount of the discretionary funds will be first taken from the Organizational Capacity Improvements activity and then reduced proportionally among the other discretionary categories.

If funding is more than projected in the first or second year, some of the increased amount of the discretionary funds will be given to the ~~Direct Client Assistance activity~~Re-Entry Assistance Program, and may also be programmed into other discretionary categories that are best suited to receive the funds at the time or to the network of eligible entities to be used for CSBG eligible activities.

7.10. What types of organizations, if any, does the State plan to work with (by grant or contract using remainder/discretionary funds) to carry out some or all of the activities in table 7.9. **[Check all that apply and narrative where applicable]**

- CSBG eligible entities (15 to 3940) (if checked, provide the expected number of CSBG eligible entities to receive funds)
- Other community-based organizations
- State Community Action association

- Regional CSBG technical assistance provider(s)
- National technical assistance provider(s)
- Individual consultant(s)
- Tribes and Tribal Organizations
- Other [**Migrant Seasonal Farm Worker Organizations, Housing Voucher Program Support, Homelessness Organization, Reentry Organizations**]
- None (the State will carry out activities directly)

Note: This response will link to the corresponding CSBG assurance, item 14.2.

If this is the first year filling out the automated State Plan, skip the following question.

7.11. Performance Management Adjustment: How is the State adjusting the use of remainder/discretionary funds under this State Plan as compared to past plans? Any adjustment should be based on the State’s analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any adjustments, provide further detail. [**Narrative:**

The Department anticipates an increase in CSBG funding for 202~~24~~²⁵ and 202~~35~~³⁵ as compared to the ~~projections in the 20202~~ and 202~~13~~¹³ CSBG State Plan. Within the Other Activities category in 2022 and 2023, the Department-State will: 1) Create a new Re-Entry Assistance Program to assist previously incarcerated individuals obtain housing; 2) Remove the Direct Client Assistance category; 3) Decrease the amount allocated to Organizational Capacity Improvements and Training & Technical Assistance Services through an Outside Provider; 4) continue to utilize \$150,000 for training and technical assistance activities. Increase the amount allocated to the Housing Voucher Program Support Fund and the Disaster Recovery Fund; and 5) make no changes to the amount allocated to the Network Transition Fund, Migrant Seasonal Farmworker and Native American Populations Employment and Education Initiatives, and the Balance of State Continuum of Care and Related Statewide Homelessness Initiatives. Within the Other Activities category, the State will: rename Network Operational Investments to Organizational Capacity Improvements and increase the Direct Client Assistance activity funding from \$500,000 to \$550,000.

Note:

If funding is less or more than projected, reductions/increases will be implemented as described in Section 7.9. With a growing need to transition previously incarcerated individuals to life in the community, the State has created a new Re-Entry Assistance program which will assist former inmates through the use of landlord incentives to mitigate barriers preventing individuals from acquiring housing. The State continues to support homelessness initiatives and feels that the use of this small amount of discretionary funds is able to create an impact in serving homelessness particularly in rural Texas. And, the State continues its commitment to provide funding to organizations serving migrant seasonal farmworkers and Native Americans to provide education and employment assistance.]

Note: This information is associated with State Accountability Measures 3Sb, and will pre-populate the State’s annual report form.

SECTION 8 State Training and Technical Assistance

8.1. Describe the State’s plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan by completing the table below. Add a row for each activity: indicate the timeframe; whether it is training, technical assistance or both; and the topic. (CSBG funding used for this activity is referenced under item 7.9(a), Use of Remainder/Discretionary Funds.)

Note: 8.1 is associated with State Accountability Measure 3Sc and may pre-populate the State’s annual report form.

Fiscal Year (Y) Quarter (Q) / Timeframe	Training (T), Technical Assistance (TA), or Both (B)	Topic	Brief Description of Other
FY1 - Q1	B	F, GTB, OS-G, OS-US, CSD, R, ROMA, CA, SP, M, CM, NPI	Department staff provides technical assistance as identified by our T&TA Plan that was developed by the state office, state association, and RPIC. The T&TA plan was developed from eligible entity requests, monitoring reports, workgroups, surveys, and performance analysis. The State has an on-line system to request T&TA or to submit questions for TA. T&TA is conducted by the following means: on-site and virtual training, conferences, regional training series, webinars, teleconferences, workshops, videos, Best Practices, FAQs, and online tools/resources. Training is customized to the needs of the eligible entity. ROMA is embedded into all trainings, guidance, and materials. Initial CM training is provided through an online video training series. Subsequent CM training is provided on-site and/or <u>via virtual trainings in regions.</u> Individualized TA for <u>CMA</u> will be provided as a

Fiscal Year (Y) Quarter (Q) / Timeframe	Training (T), Technical Assistance (TA), or Both (B)	Topic	Brief Description of Other
			continuation to CA trainings and guides previously provided. GTB trainings are provided <u>when requested</u> most — <u>quarters</u> , along with online Board training resources. TA on reporting is provided monthly by Department reporting staff and performance analysis is provided by trainers. F, OS-G, OS-US, T&TA will be provided as requested and as needed; although aspects of each are incorporated into trainings as appropriate. CA, SP, CSD, M, TA will be provided as needed. Training and Technical Assistance Services through a third party will be provided to entities identified as “at-risk”.
FY1 - Q2	B	F, GTB, OS-G, OS-US, CSD, R, ROMA, M, CM, NPI	Same as FY1-Q1
FY1 – Q3	B	F, GTB, OS-G, OS-US, CSD, R, ROMA, M, CM, NPI	Same as FY1-Q1
FY1 – Q4	B	F, GTB, OS-G, OS-US, CSD, R, ROMA, M, CM, NPI	Same as FY1-Q1
FY2 – Q1	B	F, GTB, OS-G, OS-US, CSD, R, ROMA, M, CM, NPI	Same as FY1-Q1
FY2 – Q2	B	F, GTB, OS-G, OS-US, CSD, R, ROMA, M, CM, NPI	Same as FY1-Q1
FY2 – Q3	B	F, GTB, OS-G, OS-US, CSD, R, ROMA, M, CM, NPI	Same as FY1-Q1

Fiscal Year (Y) Quarter (Q) / Timeframe	Training (T), Technical Assistance (TA), or Both (B)	Topic	Brief Description of Other
FY2 – Q4	B	F, GTB, OS-G, OS-US, CSD, R, ROMA, M, CM, NPI	Same as FY1-Q1

Topic:

- Fiscal (F)
- Governance/Tripartite Boards (GTB)
- Organizational Standards-General (OS-G)
- Organizational Standards (OS-US)– for eligible entities with unmet standards on Technical Assistance Plans or Quality Improvement Plans
- Correcting Significant Deficiencies Among Eligible Entities (CSD)
- Reporting (R)
- ROMA
- Community Assessment (CA)
- Strategic Planning (SP)
- Monitoring (M)
- Communications (C)
- Technology (T)
- National Performance Indicators (NPI)
- Other – Case Management (CM)

8.1a. The planned budget for the training and technical assistance plan (as indicated in the Remainder/Discretionary Funds table in item 7.9): **[150,000]**

If this is the implementation year for organizational standards, skip question 8.2.

8.2. Does the State have in place Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs) for all eligible entities with unmet organizational standards, if appropriate?

Yes No (The Department reviews all submitted documentation of Organizational Standards, and provides technical assistance and detailed guidance for all standards that are not met. The Department continues to train and assist the network of eligible entities which, as a whole, are still in the process of putting systems in place to achieve Organizational Standards compliance, and maintain applicable documentation on a regular and timely basis enabling them to upload related documents throughout the year. Improvements are made each succeeding year.

Eligible entities who meet 30%-69.99% of Organizational Standards will be required to work with the Department to develop a TAP which will include targeted training and technical assistance and a timeframe for the entity to meet the standards. Failure to show progress in meeting TAP targets may result in an entity being placed on a QIP. Eligible entities who achieve 70%-99.99% will be provided with technical assistance with the goal of achieving 100% compliance in the following year. ~~In FFY 2022 and 2023, e~~Eligible

entities who have met less than 30% of the Organizational Standards in consecutive years may be placed on a Quality Improvement Plan, which will establish a timeframe and benchmarks for improvement. Additionally, any entity not showing progress in meeting Organizational Standards for three consecutive years may also result in an entity being placed on a QIP. Failure to show progress in meeting QIP targets as well as significant and repetitive issues identified in monitoring reviews may result in the State proceeding to take additional actions including termination of CSBG funding per CSBG Information Memorandum 116 and state rules.

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

8.3. Indicate the types of organizations through which the State plans to provide training and/or technical assistance as described in item 8.1, and briefly describe their involvement? (Check all that apply.) **[Check all that applies and narrative where applicable]**

- CSBG eligible entities (if checked, provide the expected number of CSBG eligible entities to receive funds) **[Narrative]**
- Other community-based organizations
- State Community Action association
- Regional CSBG technical assistance provider(s)
- National technical assistance provider(s)
- Individual consultant(s)
- Tribes and Tribal Organizations
- Other []

If this is the first year filling out the automated State Plan, skip the following question.

8.4. Performance Management Adjustment: How is the State adjusting the training and technical assistance plan under this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any adjustments, provide further detail. **[Narrative:** Texas has developed its T/TA Plan in partnership with the state association and RPIC (as laid out in the T/TA Template). Texas has increased network input through workgroups, and online T&TA surveys/evaluations. Each Eligible Entity (EE) is assigned a ~~personal~~ trainer as their point-of-contact. Each ~~personal~~ trainer tracks all performance/expenditures, T&TA needs, and provides EEs with data analysis, TAPs, and other needs. The State uses the AC SI Survey results when developing the Joint State TTA Plan with the State Association. The

State training team decided to address the two ACSI Survey drivers that had scores lower than the National scores.

In response to our score of ~~590~~ in the Monitoring and Corrective Action driver, the State implemented the following:

- Compliance monitors copy training staff on all eligible entity communications.
- The training team provides monitors with performance and expenditure dashboards for each eligible entity prior to the onsite visit.
- After each visit, the trainers meet with the monitors to discuss findings and/or concerns, and as appropriate, develop a TTA plan.
- The training team meets with monitors pre and/or post monitoring to review issues and ensure alignment.
- Technical assistance is provided to eligible entities related to monitoring findings.

In response to our score of ~~7458~~ in the Communication driver, the State implemented the following:

- ~~• To eliminate redundancy and excessive emails to eligible entities, the training team forwards all upcoming training events (local, regional, and national) to the State Association to send out in a bi-monthly e-Newsletter, which is emailed to the entire Network.~~
- The training team disseminates announcements, changes and/or new requirements in a timely manner to the CSBG network.
- Network emails are sent out whenever new or updated guides, best practices, or tools are released. Webinars, virtual meetings and trainings are conducted whenever training is required for use of new or updated materials.
- A contact list with name, email, and phone number of State staff to contact regarding contracts, reporting, fiscal, and training was sent to each eligible entity. State staff are listed on the main page of the Community Affairs website, along with organizational charts indicating each staff member and their responsibilities. Each trainer has a back-up trainer to promote greater staff availability.
- The Department has continued its use of the online submission of questions that are answered by staff within 72 hours, typically within the day.
- ~~• Created a COVID-19 webpage for flexibilities and COVID resources.~~
- ~~• Initiated check-in calls with EEs during COVID flare-ups or disasters.~~
- Streamlined Community Action Plan and Organizational Standard documentation to reduce burden, yet meet requirements.

]

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

SECTION 9

State Linkages and Communication

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

9.1. State Linkages and Coordination at the State Level: Describe the linkages and coordination at the State level that the State plans to create or maintain to ensure increased access to CSBG services to low-income people and communities under this State Plan and avoid duplication of services (as required by the assurance under Section 676(b)(5)). Describe or attach additional information as needed. **[Check all that apply from the list below and provide a Narrative.** The Department administers the CSBG grant along with LIHEAP and Weatherization, and all are administered by the Community Affairs Division. The Department also administers the State’s housing programs.

The Department is the administrative agency for the Texas Inter-Agency Council for the Homeless (TICH). The TICH membership includes representatives from the Governor’s Office, Texas Department of Family and Protective Services, Texas Education Agency, Texas Workforce Commission, Health and Human Services Commission, criminal justice state agencies, Texas Homeless Network, and other housing and homeless advocacy organizations. The Department will continue to strengthen its collaboration with the Texas Workforce Commission to facilitate improved coordination with local Workforce Boards and eligible entities. The Department chairs the TICH. At the July 21, 2020 meeting, the TICH was provided information about the CSBG program and the eligible entities across the state.

The Department also chairs the State’s Housing and Health Services Coordination Council which is composed of several State agencies including the State’s WIOA agency, Child Protective Services, and the state health services agency. At the July 22, 2020, meeting, the HHSCC was provided information about the CSBG program and the eligible entities across the state.

The Department also participates on the Texas Reentry Task Force.}

Note: This response will link to the corresponding CSBG assurance, item 14.5. In addition, this item is associated with State Accountability Measure 7Sa and may pre-populate the State’s annual report form.

- State Low Income Home Energy Assistance Program (LIHEAP) office
- State Weatherization office
- State Temporary Assistance for Needy Families (TANF) office
- State Head Start office

- State public health office
- State education department
- State Workforce Innovation and Opportunity Act (WIOA) agency
- State budget office
- Supplemental Nutrition Assistance Program (SNAP)
- State child welfare office
- State housing office
- Other

9.2. State Linkages and Coordination at the Local Level: Describe the linkages and coordination at the local level that the State plans to create or maintain with governmental and other social services, especially antipoverty programs, to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by assurances under Sections 676(b)(5) and (b)(6)). Attach additional information as needed. **[Narrative:** The Department administers the CSBG in a state whose territory is as vast as it is varied. As such, the Department’s strategy centers on ensuring local coordination through the local service providers. The Department requires CSBG eligible entities to coordinate funds and services at the local level. The Community Action Plan from each entity has to describe the eligible entities’ coordination efforts with city, county, schools, non-profits, and other local or regional organizations. CSBG eligible entities coordinate services and work to avoid duplication of services with other providers. CSBG eligible entities are encouraged to participate in local social service and homeless coalitions whose goal is to coordinate services. The Department has stressed the importance of CSBG eligible entities coordinating with WIOA agencies to assist persons to obtain employment and other benefits through WIOA and have their Community Action Plan provide information on how they work with WIOA. To assist in this coordination, the Department will continue to build upon the working relationship with the Texas Workforce Commission (TWC) and obtain from TWC contact data for local Workforce Development Boards throughout the state and encourage eligible entities to contact the local workforce boards and their contractors who operate services and programs in order to be able to link CSBG clients to available WIOA programs so that their employment and education needs can be better served. This coordination effort will also be of benefit to WIOA in helping them target persons most in need.]

Note: This response will link to the corresponding CSBG assurances, items 14.5 and 14.6.

9.3. Eligible Entity Linkages and Coordination

9.3a State Assurance of Eligible Entity Linkages and Coordination: Describe how the State will assure that the eligible entities will coordinate and establish linkages to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by the assurance under Section 676(b)(5)). Attach additional information as needed.

[Narrative: The State requires CSBG eligible entities to coordinate funds at the local level. Their Community Action Plan has to describe their coordination efforts with city, county, schools, non-profits, and other organizations. CSBG eligible entities coordinate services and work to avoid duplication of services with other providers. Most CSBG eligible entities participate in local social service and homeless coalitions whose goal is to coordinate services.]

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

9.3b State Assurance of Eligible Entity Linkages to Fill Service Gaps: Describe how the eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations, according to the assurance under Section 676(b)(3)(B) of the CSBG Act. **[Narrative:** The Department requires a Community Action Plan be submitted annually, which includes a section wherein eligible entities describe any gaps in services, and their strategy to address those gaps. If a gap is not currently being addressed or not being sufficiently addressed, eligible entities are to develop and implement a strategy to work with other organizations in their local communities to address the gaps in services.]

Note: This response will link to the corresponding CSBG assurance, item 14.3b.

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

Yes No

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

9.4a If the State selected “yes” under item 9.4, provide the CSBG-specific information included in the State’s WIOA Combined Plan. This information includes a description of how the State and the eligible entities will coordinate the provision of employment and training activities through statewide and local WIOA workforce development systems. This information may also include examples of innovative employment and training programs and activities conducted by community action agencies or other neighborhood-based organizations as part of a community antipoverty strategy. **[Narrative, 2500 Characters]**

9.4b. If the State selected “no” under item 9.4, describe the coordination of employment and training activities, as defined in Section 3 of WIOA, by the State and by eligible entities providing activities through the WIOA system. **[Narrative:** In 2021, the State began to have virtual meetings with management at the Texas Workforce Commission to develop a plan to better coordinate CSBG and WIOA programs at the State level in order to help facilitate coordination at the local level

between CSBG eligible entities and local Workforce Boards and their contractors. The Department will obtain from the Texas Workforce Commission the contact names and contact information for local Workforce Boards and provide such to CSBG eligible entities and encourage them to establish formal relationships with their regional WIOA providers and the Workforce Board contractors so that they can better coordinate services and collaborate to assist persons to transition out of poverty. Texas has twenty-eight Workforce Development Boards serving the State's two-hundred and fifty-four counties.

Each Workforce Board determines how to administer the WIOA grants and selects their contractors to provide employment training and education. Therefore, close working relationships should be established at the local level by each CSBG eligible entity with both the Workforce Boards and their contractors. The State is available, upon request, to facilitate any CSBG eligible entity's collaborative efforts with their local WIOA office. As part of the Community Action Plan, eligible entities will continue to provide information related to employment and training activity coordination with their local WIOA office. Additional information on WIOA in Texas can be found at <https://twc.texas.gov/>

- 9.5. Emergency Energy Crisis Intervention:** Describe how the State will assure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to Low-Income Home Energy Assistance) are conducted in each community in the State, as required by the assurance under Section 676(b)(6) of the CSBG Act). **[Narrative:** The Department administers the LIHEAP grant, which funds the Comprehensive Energy Assistance Program (CEAP). The CEAP provides utility assistance to low-income persons and includes an energy crisis component. LIHEAP also supports the Department's weatherization program. The majority of the CSBG eligible entities administer both the CEAP and weatherization programs. The Department programs a portion of CSBG discretionary funds for assistance in the case of declared natural disasters. The funds may be used to provide emergency energy crisis intervention.]

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

- 9.6. State Assurance: Faith-based Organizations, Charitable Groups, Community Organizations:** Describe how the State will assure local eligible entities will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations, according to the State's assurance under Section 676(b)(9) of the CSBG Act. **[Narrative:** Annually, CSBG eligible entities must submit a Community Action Plan to the Department. As part of the plan, CSBG eligible entities describe the organizations with which they coordinate services including faith-based organizations, charitable groups, and community organizations. Close coordination and referral takes place with these organizations. Training further reinforces this coordination.]

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

9.7 Coordination of Eligible Entity 90 Percent Funds with Public/Private Resources: Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act. **[Narrative:** Annually, CSBG eligible entities must submit a Community Action Plan to the Department. As part of the plan, CSBG eligible entities describe the organizations with which they coordinate services, including private and public organizations. Many of the CSBG eligible entities obtain either in-kind assistance or funds from local governments to support the programs that they administer, including donations of space in local government facilities to be utilized by eligible entities to provide CSBG supported services.]

Note: this response will link to the corresponding assurance, item 14.3c.

9.8. Coordination among Eligible Entities and State Community Action Association: Describe State activities for supporting coordination among the eligible entities and the State Community Action Association. **[Narrative:** The Department works closely with the state ~~eligible entity~~ association, the Texas Association of Community Action Agencies (TACAA). The Department meets with the association and their board ~~on a regular basis~~ to discuss ways that the Department can better meet the needs of the eligible entities. The Department receives their input on the development of the CSBG State Plan, training and technical assistance needs, rule revisions, ~~use of CSBG discretionary funds, and among~~ other issues. The state association holds an annual conference for CSBG eligible entities and the Department provides staff to present training to CSBG eligible entities. When necessary, the Department also works with TACAA to form CSBG working groups to help the Department develop strategies on key issues. It should be noted that because not all eligible entities are members of TACAA, the Department ensures that all non-member eligible entities are included in all opportunities.]

9.9 Communication with Eligible Entities and the State Community Action Association: In the table below, describe the State’s plan for communicating with eligible entities, the State Community Action Association, and other partners under this State Plan. Include communication about annual hearings and legislative hearings, as described under Section 4, CSBG Hearing Requirements.

Communication Plan

Topic	Expected Frequency	Format (drop down)	Brief Description of “Other”
[Narrative: The Department will hold periodic meetings either virtually or in-person that are open to the entire CSBG network. During these meetings, the Department discusses issues and announcements surrounding CSBG related	Dropdown Options: <ul style="list-style-type: none"> • <input type="checkbox"/> Daily • <input type="checkbox"/> Weekly • <input type="checkbox"/> Twice-Monthly • <input type="checkbox"/> Monthly • <input type="checkbox"/> Quarterly • <input type="checkbox"/> Semi-Annually • <input type="checkbox"/> Annually 	Dropdown Options: <ul style="list-style-type: none"> • <input type="checkbox"/> Newsletter • <input type="checkbox"/> Mailing • <input checked="" type="checkbox"/> Meetings/Presentation • <input type="checkbox"/> Blog • <input checked="" type="checkbox"/> Email • <input checked="" type="checkbox"/> Website • <input type="checkbox"/> Social Media 	[Narrative, 2500 characters] If “Other” is selected in columns 2 and/or 3, describe in this column. Other: Communications, meetings, trainings, etc. are ongoing as needed and occur via multiple methods of communication. From time to

Topic	Expected Frequency	Format (drop down)	Brief Description of "Other"
<p>topics (e.g., Organizational Standards, RFAs, NOFAs, rule revisions, CSBG funding, performance/expenditure report deadlines, the State Plan, public hearings and public comment periods, training announcements, due dates of action plans, needs assessments and strategic plans, and similar announcements and coordination with other Department programs such as utility assistance and weatherization. The Department may bring together periodic workgroups for Network input to state plans, rules, and T&TA needs.]</p>	<ul style="list-style-type: none"> • <input checked="" type="checkbox"/> Other (Periodically) 	<ul style="list-style-type: none"> • <input checked="" type="checkbox"/> Other 	<p>time as necessary, workgroups or meetings may be formed to address key issues. The Department determines the need for training on certain topics based on requests and on questions submitted through an on-line web-portal and based on issues that are identified in monitoring reports.</p>
Topic	Expected Frequency	Format (drop down)	Brief Description of "Other"
<p>[Narrative: The Department informs CSBG eligible entities of notices received from USHHS, the National Association for State Community Services Programs, and the Community Action Partnership. This occurs as notices and guidance arises. <i>Many of these notices are shared in coordination with the Network by the State Association TACAA through their bi-monthly e-newsletter.-]</i></p>	<p>Dropdown Options:</p> <ul style="list-style-type: none"> • <input type="checkbox"/> Daily • <input type="checkbox"/> Weekly • <input type="checkbox"/> <input checked="" type="checkbox"/> Twice-Monthly • <input type="checkbox"/> Monthly • <input type="checkbox"/> Quarterly • <input type="checkbox"/> Semi-Annually • <input type="checkbox"/> Annually • <input checked="" type="checkbox"/> Other 	<p>Dropdown Options:</p> <ul style="list-style-type: none"> • <input type="checkbox"/> <input checked="" type="checkbox"/> Newsletter • <input type="checkbox"/> Mailing • <input type="checkbox"/> Meetings/Presentation • <input type="checkbox"/> Blog • <input checked="" type="checkbox"/> Email • <input type="checkbox"/> Website • <input type="checkbox"/> Social Media • <input type="checkbox"/> Other 	<p>[Narrative, 2500 characters]</p> <p>If "Other" is selected in columns 2 and/or 3, describe in this column Other: Information is continuously relayed from USHHS, NASCSP, and the CAP among other organizations to the eligible entities. Twice monthly newsletters are sent out via TACAA (the State Association) in coordination with the Department.</p>
<p>[Narrative: The Department develops guidance for the annual Community Action Plan and for the annual budget. Every 3 years, the Department issues guidance for the</p>	<p>Dropdown Options:</p> <ul style="list-style-type: none"> • <input type="checkbox"/> Daily • <input type="checkbox"/> Weekly • <input type="checkbox"/> Twice-Monthly • <input type="checkbox"/> Monthly • <input type="checkbox"/> Quarterly • <input type="checkbox"/> Semi-Annually 	<p>Dropdown Options:</p> <ul style="list-style-type: none"> • <input type="checkbox"/> Newsletter • <input type="checkbox"/> Mailing • <input checked="" type="checkbox"/> Meetings/Presentation • <input type="checkbox"/> Blog 	<p>[Narrative, 2500 characters]</p> <p>If "Other" is selected in columns 2 and/or 3, describe in this column Other: The guidance that is developed is posted on the Department's website. The</p>

Topic	Expected Frequency	Format (drop down)	Brief Description of "Other"
Community Assessment and for the Strategic Plan every 5 years. The Department also issues other program guidance on areas such as case management, self-sufficiency, program reporting, and administration.]	<ul style="list-style-type: none"> • <input checked="" type="checkbox"/> Annually • <input checked="" type="checkbox"/> Other 	<ul style="list-style-type: none"> • <input checked="" type="checkbox"/> Email • <input checked="" type="checkbox"/> Website • <input type="checkbox"/> Social Media • <input checked="" type="checkbox"/> Other 	Department may also conduct regional workshops, individualized workshops, webinars or teleconferences. Information may also be presented at State Association Conferences.
<p>[Narrative: The Department will conduct public hearings to obtain comment on the biennial CSBG State Plan and institution of rules. The Department will also accept public comment via e-mail or letters and at Governing Board meetings.]</p>	<p>Dropdown Options:</p> <ul style="list-style-type: none"> • <input type="checkbox"/> Daily • <input type="checkbox"/> Weekly • <input type="checkbox"/> Twice-Monthly • <input type="checkbox"/> Monthly • <input type="checkbox"/> Quarterly • <input type="checkbox"/> Semi-Annually • <input type="checkbox"/> Annually • <input checked="" type="checkbox"/> Other 	<p>Dropdown Options:</p> <ul style="list-style-type: none"> • <input type="checkbox"/> Newsletter • <input type="checkbox"/> Mailing • <input checked="" type="checkbox"/> Meetings/Presentation • <input type="checkbox"/> Blog • <input checked="" type="checkbox"/> Email • <input checked="" type="checkbox"/> Website • <input type="checkbox"/> Social Media • <input checked="" type="checkbox"/> Other 	<p>[Narrative, 2500 characters]</p> <p>If "Other" is selected in columns 2 and/or 3, describe in this column. Other: Information regarding the public hearings will be posted in the <i>Texas Register</i> to coincide with the biennial CSBG State Plan.</p> <p>The hearings will be open to interested persons. Comments can be submitted in person at a hearing or in writing by e-mail or letter to the Department. During the COVID-19 pandemic, meetings will be conducted virtually.</p>

9.10. Feedback to Eligible Entities and State Community Action Association: Describe how the State will provide feedback to local entities and State Community Action Associations regarding performance on State Accountability Measures. **[Narrative:** The Department will, within 60 calendar days of receiving feedback from OCS, provide eligible entities and the State Association, via an e-mail communication, the results of the ACSI Survey. The Department will also provide a synopsis of key concerns identified by eligible entities. The Department will also communicate with the State Association to discuss survey results and develop a plan to address concerns.]

Note: This information is associated with State Accountability Measure 5S(iii). The measure indicates feedback should be provided within 60 calendar days of the State getting feedback from OCS.

If this is the first year filling out the automated State Plan, skip the following question.

9.11. Performance Management Adjustment: How is the State adjusting the Communication plan in this State Plan as compared to past plans? Any adjustment should be based on the State’s analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any adjustments, provide further detail. **[Narrative: ~~The Department works in partnership with the State Association regarding communications sent out to the Network. The State Association sends out a twice a month e newsletter which compiles guidance from OCS, the Department, upcoming T&TA opportunities, and other information.~~** The Department continually assesses the need to form workgroups with either the State Association or with eligible entities or both in order to receive input to rules, plans, guidance, or T&TA needs. Other ways the Department obtains the Network’s input is surveys and e-mail communications. One of the comments in the 2019 most recent ACSI survey was the need for the Department to have consistent messages from program staff in the Community Affairs Division and monitors in the Compliance Division-. In response to that input the Community Affairs Division, which administers the CSBG grant, has strengthened their coordination with the Compliance Division to share the results of monitoring reviews, and to develop and deliver training and technical assistance to address identified issues. ~~Pandemic related communications are posted on a Department COVID-19 Webpage.~~ FAQs are updated as needed with an email announcement of posting and new FAQs.]

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

SECTION 10

Monitoring, Corrective Action, and Fiscal Controls

Monitoring of Eligible Entities (Section 678B(a) of the CSBG Act)

10.1. Specify the proposed schedule for planned monitoring visits including: full on-site reviews; on-site reviews of newly designated entities; follow-up reviews – including return visits to entities that failed to meet State goals, standards, and requirements; and other reviews as appropriate.

This is an estimated schedule to assist States in planning. States may indicate “no review” for entities the State does not plan to monitor in the performance period.

For States that have a monitoring approach that does not fit within the table parameters, attach the State’s proposed monitoring schedule.

Note: This information is associated with State Accountability Measure 4Sa(i); this response may pre-populate the State’s annual report form.

CSBG Eligible Entity	Review Type	Target Date FY22-FY23(Quarter) (Note: the dates may change based on risk)	Date of Last Full Onsite Review (if applicable)	Brief Description of "Other"
El Paso Community Action program, Project BRAVO, Inc.	Full on-site	FY2 3 <u>2</u> Q 3 <u>4</u>	February 3, 2020	Risk Based and can change accordingly
Panhandle Community Services	Full on-site	FY2 4 <u>3</u> Q 1 <u>4</u>	FY21Q4 July 6, 2021	Risk Based and can change accordingly
Brazos Valley Community Programs	Full on-site	FY2 6 <u>2</u> Q3	March 23, 2020 February 13, 2023	Risk Based and can change accordingly
Rolling Plains Management Corp.	Full on-site	FY23Q 2 <u>1</u>	December 14, 2020	Risk Based and can change accordingly
Combined Community Action, Inc.	Full on-site	FY2 4 <u>2</u> Q3	November 18, 2019 December 30, 2021	Risk Based and can change accordingly
Hidalgo County Community Services Agency	Full on-site	FY23Q4	FY21Q3 June 21, 2021	Risk Based and can change accordingly
Community Action Social Services and Education	Full on-site	FY2 3 <u>2</u> Q 3 <u>4</u>	March 31, 2018	Risk Based and can change accordingly
South Texas Development Council	Full on-site	FY2 5 <u>2</u> Q2	January 14, 2021December 12, 2022	Risk Based and can change accordingly
Gulf Coast Community Services Association	No Review	<u>FY24Q1</u>	FY21Q4 July 29, 2021	Risk Based and can change accordingly
Austin, City of, Health and Human Service Department	Full on-site	FY2 4 <u>2</u> Q 2 <u>1</u>	August 22, 2018 November 2021	Risk Based and can change accordingly
Community Council of Greater Dallas	Full on-site	FY2 4 <u>2</u> Q 2 <u>3</u>	July 22, 2019October 22, 2021	Risk Based and can change accordingly
Community Action Committee of Victoria, Texas	Full on-site	FY22Q3	September 30, 2019	Risk Based and can change accordingly
Cameron and Willacy Counties Community Projects, Inc.	Full on-site	FY22Q1	October 28, 2019	Risk Based and can change accordingly
Tri-County Community Action, Inc.	Full on-site	FY2 4 <u>3</u> Q2	FY21Q3 March 30, 2021	Risk Based and can change accordingly
Community Services, Inc.	Full on-site	FY22Q3	July 8, 2019	Risk Based and can change accordingly
Pecos County Community Action Agency	Full on-site	FY23Q4	January 11, 2021	Risk Based and can change accordingly
Economic Opportunities Advancement Corp of PR XI	Full on-site	FY22Q3	January 1, 2020	Risk Based and can change accordingly
Texas Neighborhood Services	Full on-site	FY2 5 <u>2</u> Q 2 <u>1</u>	May 28, 2019 March 28, 2022	Risk Based and can change accordingly
Aspermont Small Business Development Center, Inc.	Full on-site	FY22Q1	November 18, 2019 December 5, 2022	Risk Based and can change accordingly

CSBG Eligible Entity	Review Type	Target Date FY22-FY23(Quarter) (Note: the dates may change based on risk)	Date of Last Full Onsite Review (if applicable)	Brief Description of "Other"
West Texas Opportunities, Inc.	Full on-site	FY2 5 3Q2	July 27, 2020 June 22, 2022	Risk Based and can change accordingly
Greater East Texas Community Action Program	Full on-site	FY23Q3	April 4, 2020 July 6, 2022	Risk Based and can change accordingly
Southeast Texas Regional Planning Commission	Full on-site	FY2 3 2Q 3 1	July 22, 2019	Risk Based and can change accordingly
City of San Antonio Department of Community Initiatives	Full on-site	FY2 6 2Q2	February 24, 2020 March 6, 2023	Risk Based and can change accordingly
Central Texas Opportunities, Inc.	Full On-site	FY23Q3	September 28, 2020	Risk Based and can change accordingly
Concho Valley Community Action Agency	Full On-site	FY23Q4	FY21Q3 April 19, 2021	Risk Based and can change accordingly
Community Action Inc. of Central Texas	Full On-site	FY2 6 2Q1	FY21Q3 March 27, 2023	Risk Based and can change accordingly
Community Services of Northeast Texas, Inc.	Full On-site	FY23Q 3 1	FY21Q2 December 7, 2020	Risk Based and can change accordingly
South Plains Community Action Association, Inc.	No Review	FY24Q4	FY21Q4 August 2, 2021	Risk Based and can change accordingly
City of Fort Worth Neighborhood Services Department	Full On-site	FY22Q2	February 10, 2020	Risk Based and can change accordingly
City of Lubbock Community Development Department	No Review	Voluntarily Relinquished	FY21Q4	Risk Based and can change accordingly
Economic Action Committee of the Gulf Coast	Full on-site	FY2 6 2Q3	July 10, 2019 January 23, 2023	Risk Based and can change accordingly
Galveston County Community Action Council, Inc.*	Full on-site	De-designated FY22Q4	March 25, 2019	Risk Based and can change accordingly
Webb County Community Action Agency	Full on-site	FY2 5 2Q1	December 9, 2019 July 15, 2022	Risk Based and can change accordingly
Williamson-Burnet County Opportunities, Inc.	Full on-site	FY2 3 2Q 3 2	April 22, 2019	Risk Based and can change accordingly
Big Bend Community Action Committee, Inc.	No review	FY26Q2	January 23, 2023 FY21Q4	Risk Based and can change accordingly
Community Action Corporation Of South Texas	Full on-site	FY23Q3	July 8, 2019	Risk Based and can change accordingly
Community Council of South Central Texas, Inc.	Full on-site	FY23Q1	October 9, 2020	Risk Based and can change accordingly
Guadalupe Economic Services Corporation	Full on-site	FY24Q1		Risk Based and can change accordingly

CSBG Eligible Entity	Review Type	Target Date FY22-FY23(Quarter) (Note: the dates may change based on risk)	Date of Last Full Onsite Review (if applicable)	Brief Description of "Other"
Hill Country Community Action Association, Inc.	Full on-site	FY2 32 Q 42	December 6, 2018 September 10, 2020	Risk Based and can change accordingly
Nueces County Community Action Agency	Full on-site	FY2 43 Q2	FY21Q4August 2, 2021	Risk Based and can change accordingly
Texoma Council of Governments	Full on-site	FY2 42 Q3	July 29, 2019December 3, 2021	Risk Based and can change accordingly

* If the eligible entity removal process is complete, the Department will conduct a close-out monitoring within 90 days.

10.2. Monitoring Policies: Provide a copy of State monitoring policies and procedures by attaching and/or providing a hyperlink. [Refer to Attachment A - The FY202~~42~~ and FY202~~53~~ monitoring schedule is aggregate in nature. The schedule is created on an at-risk assessed basis determined every quarter. The schedule is maintained on the Compliance Subrecipient Monitoring Tracking Database and Performance Records. The proposed schedule above can change each quarter depending on risk.]

10.3. Initial Monitoring Reports: According to the State’s procedures, by how many calendar days must the State disseminate initial monitoring reports to local entities? [It is the Department’s goal to submit CSBG monitoring reports within 30 calendar days from the last day of the monitoring visit. However, if extenuating circumstances are present, the CSBG monitoring report will be submitted within 60 days of the completion of the monitoring review with the exception of those few reports requiring executive and legal review due to deficiencies.]

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

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

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

10.4a. If no, describe State procedures for addressing eligible entity findings/deficiencies, and the documenting of closure of findings. [Narrative, 2500 characters]

10.5. Quality Improvement Plans (QIPs): How many eligible entities are currently on Quality Improvement Plans? [0]

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

- 10.6. Reporting of QIPs:** Describe the State’s process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the State approving a QIP? **[Narrative:** The Department will contact the Office of Community Services either by phone or through e-mail to inform them of eligible entities on a Quality Improvement Plan.]

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

- 10.7. Assurance on Funding Reduction or Termination:** Does the State assure, according to Section 676(b)(8), that “any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b).” Yes No

Note: This response will link with the corresponding assurance under item 14.8.

Policies on Eligible Entity Designation, De-designation, and Re-designation

- 10.8.** Does the State CSBG statute and/or regulations provide for the designation of new eligible entities? Yes No

10.8a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for the designation of new eligible entities. **[Narrative:** Texas Administrative Code

10 TAC §6.208

[http://texreg.sos.state.tx.us/public/readtac\\$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=10&pt=1&ch=6&rl=208](http://texreg.sos.state.tx.us/public/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=10&pt=1&ch=6&rl=208)]

- 10.9.** Does the State CSBG statute and/or regulations provide for de-designation of eligible entities? Yes No

10.9a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for de-designation of new eligible entities. **[Narrative:** Texas Administrative Code:

10 TAC §1.411

[https://texreg.sos.state.tx.us/public/readtac\\$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=10&pt=1&ch=1&rl=411](https://texreg.sos.state.tx.us/public/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=10&pt=1&ch=1&rl=411)

10 TAC §2.203

[https://texreg.sos.state.tx.us/public/readtac\\$ext.ViewTAC?tac_view=5&ti=10&pt=1&ch=2&sch=B&rl=Y](https://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=5&ti=10&pt=1&ch=2&sch=B&rl=Y)

10 TAC §6.208

[http://texreg.sos.state.tx.us/public/readtac\\$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=10&pt=1&ch=6&rl=208](http://texreg.sos.state.tx.us/public/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=10&pt=1&ch=6&rl=208)

10.10. Does the State CSBG statute and/or regulations specify a process the State CSBG agency must follow to re-designate an existing eligible entity? Yes No

10.10a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for re-designation of existing eligible entities. **[Narrative:** Texas Administrative Code

10 TAC §2.203

[https://texreg.sos.state.tx.us/public/readtac\\$ext.ViewTAC?tac_view=5&ti=10&pt=1&ch=2&sch=B&rl=Y](https://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=5&ti=10&pt=1&ch=2&sch=B&rl=Y)

10 TAC §6.208

[http://texreg.sos.state.tx.us/public/readtac\\$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=10&pt=1&ch=6&rl=208](http://texreg.sos.state.tx.us/public/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=10&pt=1&ch=6&rl=208)

Fiscal Controls and Audits and Cooperation Assurance

10.11. Fiscal Controls and Accounting: Describe how the State's fiscal controls and accounting procedures will a) permit preparation of the SF-425 Federal fiscal reports (FFR) and b) permit the tracing of expenditures adequate to ensure funds have been used appropriately under the block grant, as required by Block Grant regulations applicable to CSBG at 45 CFR 96.30(a). **[Narrative:** All expenditures are recorded in the Department's PeopleSoft accounting system. Indexes, grant numbers and fund numbers allow for identification of charges to a specific grant and cost categories. Policies and Procedures are in place to ensure compliance with statutes and regulations. Independent annual financial audit and single audit are performed for the Department.

Every draw is reviewed by program staff upon submittal by contractor localities. All drawdowns must be consistent within the most current approved budget. Draws are then processed by accountants and approved by senior accountant or team leader. Back up to support draws are reviewed during on site monitoring.

The general ledger is the source for the SF-425 Federal fiscal reports. They are prepared by the grant accountant, reviewed by the financial team leader and approved by management prior to submittal. Reports are prepared according to program rules and regulations.]

10.12. Single Audit Management Decisions: Describe State procedures for issuing management decisions for eligible entity single audits, as required by Block Grant regulations applicable to CSBG at 45 CFR 75.521. If these procedures are described in the State monitoring protocols attached under item 10.2, indicate the page number. **[Narrative:** The Department requires each

eligible entity to complete an Audit Certification form within 60 days from the end of the Entity's fiscal year. This is used to determine if a Single Audit is required. Upon receipt of the Single Audit, a review is completed to determine if the packet submitted is complete and all opinions are provided. If the audit contains findings, it is reviewed and discussed by the director of Internal Audit, the Director of Compliance, the Director of Subrecipient Monitoring and staff to determine the appropriate steps to address any CSBG issues identified in the audit report or management letter. The Department may issue correspondence to the entity, identifying applicable corrective action measures and/or requiring support documentation addressing program deficiencies. The entity will be provided a time frame to respond to the correspondence.

Except for non-discretionary CSBG funds, the Department will not execute new contracts with the entity until issues with the single audit are resolved, unless the issue is a late audit submittal and the entity has provided documentation of an extension received from the federal cognizant agency.]

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

10.13. Assurance on Federal Investigations: Will the State “permit and cooperate with Federal investigations undertaken in accordance with Section 678D” of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act? Yes No

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

If this is the first year filling out the automated State Plan, skip the following question.

10.14. Performance Management Adjustment: How is the State adjusting monitoring procedures in this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If this State is not making any adjustments, provide further detail. **[Narrative:** The Department closely reviewed the responses to the 2019 ACSI Survey related to monitoring and the Department's Director of Subrecipient Monitoring continues to make concerted efforts to maintain a good working relationship with CSBG eligible entities. The Director ensures that monitoring staff receive directives and audit training as the need arises. Staff meetings are held regularly to promote consistency and increase knowledge between the monitoring staff. Community Affairs Training and Technical Assistance staff receive all monitoring reports from compliance monitors and work closely with each other so that training and technical assistance staff can provide eligible entities follow-up tips and resources to address findings or concerns identified in the monitoring reports.]

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

SECTION 11

Eligible Entity Tripartite Board

- 11.1.** Which of the following measures are taken to ensure that the State verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B of the CSBG Act? **[Check all that applies and narrative where applicable]**

- Attend Board meetings
- Review copies of Board meeting minutes
- Keep a register of Board vacancies/composition
- Other: [The Department reviews board rosters and Board member election/selection material. We also get information on board vacancies on their CSBG Monthly Performance Report. Through CSBG organizational standards reviews, we get information on board vacancies/composition also. Lastly, Department staff attends some Board meetings of entities.]

- 11.2.** How often does the State require eligible entities (which are not on TAPs or QIPs) to provide updates (e.g., copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc.) regarding their Tripartite Boards? **[Check all that applies and narrative where applicable]**

- Annually
- Biannually
- Quarterly
- Monthly
- Other [Information concerning board vacancies and new hires must be received by the Department within 30 days of such occurrence. Eligible entities must also report board vacancies by sector in its CSBG Monthly Performance Reports. Organizational Standards, a yearly requirement, also indicates board vacancies and composition.]

- 11.3. Assurance on Eligible Entity Tripartite Board Representation:** Describe how the State will carry out the assurance under Section 676(b)(10) of the CSBG Act that the State will require eligible entities to have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entities' Tripartite Board. **[Narrative:** The Department has instituted a rule, in the Texas Administrative Code, that requires an entity to have written procedures under which a low-income individual, community organization, religious organization, or representative of such may petition for adequate representation on the board of the eligible entity.]

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

- 11.4.** Does the State permit public eligible entities to use, as an alternative to a Tripartite Board, "another mechanism specified by the State to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation

of programs” as allowed under Section 676B(b)(2) of the CSBG Act.
 Yes No

11.4a. If yes, describe the mechanism used by public eligible entities as an alternative to a Tripartite Board. **[Narrative:** Public agencies have advisory boards and develop bylaws for the advisory board.

Texas Administrative Code, Chapter 6, Subchapter B, Community Services Block Grant, RULE §6.210 Board Structure, states the following related to public organizations:

“(b) For a Public Organization that is an Eligible Entity, the entity shall administer the CSBG grant through an advisory board that fully participates in the development, planning, implementation and evaluation of programs that serve low-income communities or through another mechanism specified by the state and that satisfies the requirements of a tripartite board in subsection (a) above. The advisory board is the only alternative mechanism for administration the Department has specified.”

The “alternative mechanism” is an “advisory board” and Public Organizations who utilize an advisory board must ensure that the advisory board meets the requirements of having 1) One-third of the members of the board shall be elected public officials, holding office on the date of the selection, or their representatives. 2) Not fewer than 1/3 of the members are persons chosen in accordance with the Eligible Entity’s Board-approved written 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. And 3) The remainder are members of business, industry, labor, religious, law enforcement, education, or other major groups and interests in the community served.

SECTION 12

Individual and Community Income Eligibility Requirements

12.1. Required Income Eligibility: What is the income eligibility threshold for services in the State? **[Check one item below.]**

- 125% of the HHS poverty line
- X % of the HHS poverty line (fill in the threshold): _____% **[insert up to a 3 digit percentage]**
- Varies by eligible entity

12.1a. Describe any State policy and/or procedures for income eligibility, such as treatment of income and family/household composition. **[Narrative:** The Department's administrative rule, TAC Rule §6.4, states the following: "(a) Eligibility for program assistance is determined under the Poverty Income Guidelines and calculated as described herein (some forms of income may qualify the Household as Categorically Eligible for assistance in §6.2(b)(3), however Categorical Eligibility does not determine the level of benefit, which is determined through the Income Determination process). Income means cash receipts earned and/or received by the applicant before taxes during applicable tax year(s), but not the excluded income listed in paragraph (2) of this subsection. Gross income is to be used, not net income, except that from non-farm or farm self-employment net receipts must be used (i.e., receipts from a person's own business or from an owned or rented farm after deductions for business or farm expenses), and net income from gambling or lottery winnings."

The TAC RULE §6.4 identifies types of income sources that are excluded.

- (b) The requirements for determining whether an applicant Household is eligible for assistance require the Subrecipient to annualize the Household income based on verifiable documentation of income, within 30 days of the application date. Income is based on the Gross Annual Income for all household members 18 years or older. Annual gross income is the total amount of money earned annually before taxes or any deductions.
- (c) The Subrecipient must document all sources of income, including excluded income, for 30 days prior to the date of application, for all household members 18 years of age or older.
- (d) Identify all income sources, not on the excluded list, for income calculation.
 - (1) The Subrecipient must calculate projected annual income by annualizing current income. Income that may not last for a full 12 months should be calculated assuming current circumstances will last a full 12 months, unless it can be

documented that employment is less than 12 months/year and pay is not prorated over the entire 12 month period. For incomes not able to be annualized over a twelve month period, the income shall be calculated on the total annual earning period (e.g., for a teacher paid only nine months a year, the annual income should be the income earned during those nine months). In limited cases where income is not paid hourly, weekly, bi-weekly, semi-monthly nor monthly, the Subrecipient may contact the Department to determine an alternate calculation method in unique circumstances on a case-by-case basis.

- (2) For all customers including those with categorical eligibility, the Subrecipient must collect verifiable documentation of Household income received in the 30 days prior to the date of application.
- (3) Once all sources of income are known, Subrecipient must convert reported income to an annual figure. Convert periodic wages to annual income by multiplying:
 - (A) Hourly wages by the number of hours worked per year (2,080 hours for full-time employment with a 40-hour week and no overtime);
 - (B) Weekly wages by 52;
 - (C) Bi-weekly wages (paid every other week) by 26;
 - (D) Semi-monthly wages (paid twice each month) by 24; and
 - (E) Monthly wages by 12.
 - (F) One-time employment income should be added to the total after the income has been annualized.
- (4) Except where a more frequent period is required by federal regulation, recertification of income eligibility must occur at least every twelve months.

For the complete rule see attachment.

12.2. Income Eligibility for General/Short Term Services: For services with limited in-take procedures (where individual income verification is not possible or practical), how does the State ensure eligible entities generally verify income eligibility for services? An example of these services is emergency food assistance. **[Narrative:** Subrecipients must maintain income documentation for a direct service funded with CSBG funds. If proof of income is unobtainable they can utilize a Declaration of Income Statement. Per TAC RULE §6.4 (f) If proof of income is unobtainable, the applicant must complete and sign a Declaration of Income Statement (DIS).

12.3. Community-targeted Services: For services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations), how does the State ensure eligible entities' services target and benefit

low-income communities? **[Narrative:** The Department's Texas Administrative Code Rule §6.206 (d) Services to Poverty Population require that services be provided equitably in the CSBG service area (county/counties served). Also, in their Community Action Plan they must identify how the services proposed address the top five needs identified in their Community Action Plan. The state issues guidance on development of the Community Action Plan. If they are not planning to address one of the top five needs, they must provide an explanation as to why they are not.

SECTION 13

Results Oriented Management and Accountability (ROMA) System

- 13.1. ROMA Participation:** In which performance measurement system will the State and all eligible entities participate, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act? **[Check one]**

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

- The Results Oriented Management and Accountability (ROMA) System
- Another performance management system that meets the requirements of section 678E(b) of the CSBG Act
- An alternative system for measuring performance and results

- 13.1a.** If ROMA was selected in item 13.1, attach and/or describe the State's written policies, procedures, or guidance documents on ROMA. **[Attachment and Narrative:**

The Department has incorporated ROMA principles in the areas of reporting, community action plans, strategic planning, community needs assessments, goal/target setting, case management, and Board trainings. Entities report monthly on outcomes for family, agency and community goals identified in their community action plan. These reports are then used to evaluate entity performance. An outcome matrix, tracking incremental change, is used as part of case management services; along with tools for capturing outcomes. TDHCA has ~~three~~ 2 certified ROMA trainers on staff, and ~~2~~ NCRAs. Eligible entities now have 11 NCRTs on staff, of which 2 are Master NCRTs, and there are 2438 NCRIs. All Eligible Entities have been provided "Intro to ROMA" training and have access to a ROMA trainer. Refer to State requirements at [https://texreg.sos.state.tx.us/public/readtac\\$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=10&pt=1&ch=6&rl=206](https://texreg.sos.state.tx.us/public/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=10&pt=1&ch=6&rl=206)

- 13.1b.** If ROMA was not selected in item 13.1, describe the system the State will use for performance measurement. **[Narrative:** The Department will employ the ROMA System as described above.

- 13.2.** Indicate and describe the outcome measures the State will use to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization, as required under Section 676(b)(12) of the CSBG Act? **[Narrative:** The State assigns eligible entities a goal for the number of persons to transition out of poverty (TOP) each year. TOP is defined as the household achieving an income above 125% FPIG. The State has issued requirements related to the systems that must be in place to assist households to TOP, refer to

[https://texreg.sos.state.tx.us/public/readtac\\$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=10&pt=1&ch=6&rl=206](https://texreg.sos.state.tx.us/public/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=10&pt=1&ch=6&rl=206)

The CSBG monthly performance report includes a section where CSBG entities report the number of persons working to TOP and the number of persons that successfully TOP. Eligible Entities are to target their CSBG resources to assist persons to transition out of poverty and move towards self-sufficiency consistent with identified gaps in need. The entities' efforts in self-sufficiency, family stability, and community revitalization are reported using the NPIs in their CSBG monthly performance report.]

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

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

- 13.3.** How does the State support the eligible entities in using the ROMA system (or alternative performance measurement system)? **[Narrative:** The Department has designed the CSBG training curriculum with a focus on ROMA principals. The Department has 21 certified ROMA trainers and 1 NCRI. The state association has also assisted CSBG eligible entities in helping some of their staff to become Certified ROMA trainers/implementers/advocates. All trainings provided to entities are ROMA-focused and the Department's ROMA Certified staff members are available to provide training and technical assistance. Results achieved compared to CAP Plan are evaluated for the impact on implementation processes, re-assessment activities, and future plans. Entities can request training and technical assistance at any time and can submit questions on-line or can contact staff by phone or e-mail. ~~The Department has developed a comprehensive video training module and accompanying materials on case management with the goal of assisting persons to transition out of poverty. This module is available on our website. The Department has developed a ROMA Case Management Workflow that aligns the processes of case management to ROMA. The Department is working with a workgroup, made up of ROMA professionals, to write a case management guide to align the processes and tasks of case management to align with ROMA.~~ The Department sets aside CSBG Discretionary funds to be used for Organizational Capacity Improvements which can be used to pay for the costs of staff to become NCRT/NCRI/NCRAs or to obtain training to retain their NCRT or NCRI certifications. ~~The Department facilitates a ROMA support group for the TX CSBG NRCTs and NCRI, using Go-To-Meeting, who meet on a quarterly~~

~~basis. Using the new Virtual Intro to ROMA course, the ROMA group is working toward being able to offer regional Intro to ROMA courses on an annual basis to new staff. Additionally, the state created a ROMA certified workgroup of state and eligible entity staff to create and revise the Organizational Standard (OS) guide and tools to help increase OS achievement. This group continues to provide review and input on guides and tools that the state provides eligible entities for meeting various CSBG requirements.]~~

Note: The activities described under item 13.3 may include activities listed in “Section 8: Training and Technical Assistance.” If so, mention briefly, and/or cross-reference as needed. This response will also link to the corresponding assurance, item 14.12.

- 13.4. Eligible Entity Use of Data:** How is the State validating that the eligible entities are using data to improve service delivery? **[Narrative:** The Department assigns each CSBG eligible entity a goal for the number of persons to transition out of poverty each program year. At the end of the program year, the Department reviews their performance and entities that did not meet their assigned goal are asked to provide a plan of action to improve performance. The Department also reviews the eligible entities’ CSBG Performance Report each month and their end of the year final report. The Department does acknowledge that quite a few entities find it challenging to design and carry out community initiatives, as many just entered into this level of work. The Department will continue to provide technical assistance to entities to improve their performance through data analysis, process mapping, and training materials. To assist with data use the Department provides the network with links to data sources that may be useful to them, such as the American Community Survey and the Community Action Partnership’s Community Needs Assessment Online Tool.]

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

Community Action Plans and Needs Assessments

- 13.5.** Describe how the State will secure a Community Action Plan from each eligible entity, as a condition of receipt of CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act. **[Narrative:** The Department develops Community Action Plan Requirements and guidance and posts this information to our website at <https://www.tdhca.state.tx.us/community-affairs/csbg/additional-requirements.htm>. Annually, CSBG eligible entities must submit a Community Action Plan. Staff reviews the CAP and provides technical assistance to eligible entities on improvements.]

Note: this response will link to the corresponding assurance, item 14.11.

- 13.6. State Assurance:** Describe how the State will assure that each eligible entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity’s Community Action Plan, as required by Section 676(b)(11) of the CSBG Act. **[Narrative:** Every three years, CSBG eligible entities must complete and submit a Community Needs Assessment (CNA). The State provides forms and guidance on how to conduct a CNA and on the

required areas to be addressed in their CNA document. As part of the CNA, they must identify at least the top 5 needs in their service area based on their community assessment.

Annually, CSBG eligible entities must submit a Community Action Plan (CAP). Every third year, the CAP must be completely revised to incorporate the latest CNA results. The two years following the initial year of the CAP, they provide updates to any changes and primarily revise their performance targets for NPIs and SRVs and community initiatives. In the first year of the CAP, they must include their top 5 needs and identify the organizations providing the service or strategy to address the need, the services or strategies that will address the need, the NPIs that will be reported on, and the county(ies). They also include information on the gaps in services, the county where it exists, how they will address the gaps, names of partners they will work with and how the partner will help meet the gaps in services. SRVs and NPIs with targets are linked to one of the top 5 needs if applicable.

Note: this response will link to the corresponding assurance, item 14.11.

SECTION 14

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

14.1 Use of Funds Supporting Local Activities

CSBG Services

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

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

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

[Narrative: The Department requires CSBG eligible entities to submit an annual Community Action Plan (CAP). The CAP outlines their proposed activities. Staff reviews the CAP Plan and ensures that the activities supported are eligible uses of CSBG funds and meet the noted assurances.]

Needs of Youth

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

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

[Narrative: The Department requires CSBG eligible entities to submit an annual Community Action Plan (CAP). The CAP outlines their proposed activities. Staff reviews the CAP Plan and ensures that the activities supported are eligible uses of CSBG funds. The Department requires that entities provide a referral to the Texas Attorney General’s Office for families for whom child support might be a needed resource.]

Coordination of Other Programs

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

- (C) to make more effective use of, and to coordinate with, other programs related to the purposes of this subtitle (including State welfare reform efforts)

[Narrative: The Department requires CSBG eligible entities to submit an annual Community Action Plan (CAP). The CAP outlines their proposed activities. The CAP also includes several forms that address funding coordination, coordination with WIOA Programs, referrals to Child Support Office, and participation in social service coalitions. Staff reviews the CAP Plan and ensures that the activities supported are eligible uses of CSBG funds.]

State Use of Discretionary Funds

14.2 676(b)(2) Describe “how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in section 675C(b) in accordance with this subtitle, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of this subtitle.”

Note: The Department describes this assurance under “State Use of Funds: Remainder/Discretionary,” items 7.9-7.11.

[No response; links to items 7.9 and 7.10.]

Eligible Entity Service Delivery, Coordination, and Innovation

14.3. 676(b)(3) “Based on information provided by eligible entities in the State, a description of...”

Eligible Entity Service Delivery System

14.3a. 676(b)(3)(A) Describe “the service delivery system, for services provided or coordinated with funds made available through grants made under 675C(a), targeted to low-income individuals and families in communities within the State;

[Narrative: The Department requires CSBG eligible entities to submit an annual Community Action Plan (CAP). The CAP includes a description of the service delivery system, the counties served, the facilities where services are available, and information regarding how the eligible entity conducts outreach and delivers

services in counties where service centers are not available. The CAP also describes how the eligible entity coordinates funds with other organizations.]

Eligible Entity Linkages – Approach to Filling Service Gaps

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

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

[No response; links to 9.3b.]

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

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

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

[No response; links to 9.7]

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

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

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

[Narrative: The Department requires CSBG eligible entities to submit an annual Community Action Plan (CAP). As part of the CAP, entities must complete a document which provides information regarding any innovative community and neighborhood-based initiatives related to the purpose of CSBG, which may include fatherhood initiatives and other initiatives which strengthen families and encourage effective parenting. A limited number of CSBG eligible entities have reported these types of initiatives. The Department will continue to work with CSBG eligible entities to promote these initiatives if such gaps are identified in

their CAP. As the Department identifies information on webinars or funding opportunities related to this area, the Department shares this information with CSBG eligible entities.]

Eligible Entity Emergency Food and Nutrition Services

- 14.4. 676(b)(4)** Describe how the State will assure “that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals.”

[Narrative: The Department requires CSBG eligible entities to submit an annual Community Action Plan (CAP). As part of the CAP, entities must complete a document which provides information related to how the CSBG eligible entity will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals. Most CSBG eligible entities work with either a local food pantry or the food bank to provide food in these circumstances. If there are no other resources available, then CSBG funds are utilized to provide nutritional support.
]

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

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

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

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

State Coordination/Linkages and Low-income Home Energy Assistance

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

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

[No response; links to 9.2 and 9.5]

Federal Investigations

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

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

[No response; links to 10.13]

Funding Reduction or Termination

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

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

[No response; links to 10.7]

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

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

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

[No response; links to 9.6]

Eligible Entity Tripartite Board Representation

- 14.10. 676(b)(10)** Describe how “the State will require each eligible entity in the State to establish procedures under which a low-income individual, community

organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation.”

Note: The Department describes this assurance in the Eligible Entity Tripartite Board section, 11.3

[No response; links to item 11.3]

Eligible Entity Community Action Plans and Community Needs Assessments

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

[No response; links to items 13.5 and 13.6]

State and Eligible Entity Performance Measurement: ROMA or Alternate system

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

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

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

Validation for CSBG Eligible Entity Programmatic Narrative Sections

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

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

[No response for this item]

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

SECTION 15

Federal Certifications

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

15.1 Lobbying

Certification for Contracts, Grants, Loans, and Cooperative Agreements

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

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all entities shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

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

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete

and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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

15.2 Drug-Free Workplace Requirements

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

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

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

- (7) If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).
- (8) Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

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

Conviction means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

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

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

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Grantees Other Than Individuals)

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

- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (b) Establishing an ongoing drug-free awareness program to inform employees about - -
 - (1) The dangers of drug abuse in the workplace;
 - (2) The grantee's policy of maintaining a drug-free workplace;
 - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and

- (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will - -
 - (1) Abide by the terms of the statement; and
 - (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- (e) Notifying the agency in writing, within 10 calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
- (f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -
 - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

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

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

Texas Department of Housing and Community Affairs

221 East 11th Street

Austin, Travis County, Texas 78701-2410]

Check if there are workplaces on file that are not identified here.

Alternate II. (Grantees Who Are Individuals)

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

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

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

15.3 Debarment

CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS

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

Primary Covered Transactions

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.
- (2) The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.
- (3) The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.
- (4) The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective

primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.

- (5) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.
- (6) The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.
- (7) The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusive-Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
- (8) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Non-procurement Programs.
- (9) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
- (10) Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

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

Primary Covered Transactions

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

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

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
- (2) The certification in this clause is a material representation of fact upon which reliance was
- (3) Placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
- (4) The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier

participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.

- (5) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.
- (6) The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.
- (7) The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
- (8) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.
- (9) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
- (10) Except for transactions authorized under paragraph five of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

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

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

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

15.4 Environmental Tobacco Smoke

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

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

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

ATTACHMENTS

Attachment A
Response to Question 10.2 Monitoring Policies
Compliance Division
Subrecipient Monitoring Section

Standard Operating Procedures

1.0 Risks and Control Objectives

1.1 The risks associated with not having an SOP for Assignments and Risk Assessments and the control objectives to ensure that those risks are minimized, are illustrated in the following table:

Risks	Control Objectives
The risks associated with not having an SOP for monitoring procedures are that that monitoring reviews may not be conducted or be conducted in a consistent manner and within the requirements of the Department and/or Federal requirements.	This SOP will minimize the risks described by providing a comprehensive process for a monitoring risk assessment, monitoring assignment and for the completion of monitoring reports and responses.

2.0 Policy

2.1 It is the requirement of the Texas Department of Housing and Community Affairs and its Compliance Division to perform monitoring functions of federal and state funds, in a consistent manner that is compliant with Department and Funding source requirements. The Chief of Compliance oversees three (3) monitoring sections within the Compliance Division, one (1) of which is the Compliance Subrecipient Monitoring section. The Compliance Subrecipient Monitoring director oversees the section of employees that monitor the programs that are administered by the Community Affairs Division, Single Family, and Home and Homelessness Programs Divisions of the Department.

3.0 General

3.1 Abbreviations

- A. Texas Department of Housing and Community Affairs – Department
- B. Community Affairs Division – CAD

- C. Community Development Block Grant - CDBG
- C.D. Compliance Division - Compliance
- D.E. Compliance Division Subrecipient Monitoring Section - CMSM
- E.F. Compliance Subrecipient Monitoring Director – CMSM Director
- F.G. Subrecipient Monitor – Compliance Monitor or Monitor
- G.H. Community Affairs Division program awardees (Non-profit corporations, Counties, Cities, Council of Government’s) – Subrecipient
- H.I. Weatherization Assistance Program – WAP
- I.J. Comprehensive Energy Assistance Program – CEAP
- J.K. Community Services Block Grant - CSBG
- K.L. Department of Energy – DOE
- L.M. Emergency Solutions Grant – ESG
- M.N. HOME Investments Partnership – HOME
- N.O. Homeless Housing and Services Program – HHSP
- O.P. Housing Trust Fund – HTF
- P.Q. Low Income Housing and Energy Assistance Program – LIHEAP
- Q.R. LIHEAP Weatherization Assistance Program – LI-WAP
- R.S. National Housing Trust Fund – NHTF
- S.T. Neighborhood Stabilization Program – NSP
- T.U. Quality Control Inspector - QCI

3.2 Purpose

- A. This SOP describes the Department’s methodology for monitoring Subrecipients.
- B. To comply with Department rules on the administration on program funds.
- C. To comply with Federal Funding source requirements for administering program funds.
- D. It establishes consistent processes and procedures when monitoring CAD programs.
- E. Monitoring activities are planned to focus on areas of highest risk and to help ensure the most effective use of monitoring resources.
- F. To ensure the CMSM Compliance Monitors completed monitoring reports and responses within a designated time frame to ensure Subrecipients address any corrective actions in a timely manner.

- G. To ensure monitoring responses are reviewed to ensure corrective actions were completed.

4.0 Responsibilities

- 4.1 The CMSM section is responsible for ensuring the CEAP, CSBG, ESG, HOME, HHSP, HTF, Ending Homelessness, CDBG, Multifamily Direct HOME Loans, NHTF, NSP and WAP programs (DOE and LIHEAP) are administered and funds are expended in accordance with contract provisions and applicable State and Federal rules, regulations, policies, and related statutes.
- 4.2 The CMSM Director will ensure a monitoring schedule is developed that identifies the Subrecipients that are to be monitored.
- 4.3 According to individual program requirements and/or standards, the CMSM section will develop a list of specific compliance requirements to be reviewed. The section will also develop a methodology to review each compliance requirement consistently.
- 4.4 The CMSM section will perform the respective monitoring to determine Subrecipient compliance.
- 4.5 The CMSM monitors will notify the CMSM Director and/or Chief of Compliance if a finding or concern of fraud, waste and/or abuse were noted during a Subrecipient's monitoring.
- 4.6 Within 30 days of the completion of the monitoring, the CMSM section will develop a report or correspondence, for the Subrecipient, reflecting the results of the monitoring.
- 4.7 The CMSM section will address the Subrecipient's response to the report and/or close out the monitoring process.
- 4.8 The CMSM section will notify and work with the CAD Training section to address any findings consistent within the Subrecipient network.

5.0 Subrecipient Monitoring Selection

- 5.1 The CMSM section will complete a Subrecipient monitoring review schedule, at least quarterly each year. The schedule will identify the quarter in which the Subrecipient will be monitored.
- 5.2 The CMSM section utilizes the most efficient use of its travel and monitoring budget, as its methodology in developing the Subrecipient monitoring review schedule. The schedule takes into account the program contract periods and may require Compliance Monitors to review multiple programs during the review.
- 5.3 The Department's schedule is used as a planning tool and is subject to change. The CMSM Section may encounter situations that arise and cause Subrecipients to be monitored in

a different month or more frequently than what is identified in the schedule. These situations may include:

1. Subrecipient who may not or have not met the minimum on-site monitoring threshold.
 2. There is low production in the program(s) selected for monitoring.
 3. Monitor(s) attempt to schedule a monitoring and provides proposed monitoring dates. However, the Subrecipient is unable to accommodate the monitoring during the proposed dates.
 4. The Department receives fraud, waste and/or abuse concerns against a Subrecipient.
 5. The Department receives a credible complaint against a Subrecipient.
- 5.4 As needed, the CMSM will also factor in the results of a Subrecipient's prior monitoring review and/or Single Audit findings when determining the monitoring schedule. Subrecipient's with prior and/or repetitive monitoring and/or Single Audit findings are a priority to be monitored.
- 5.5 At a minimum:
- A. DOE (July-June) and LIHEAP WAP (Jan. – Dec.) Subrecipients will be monitored at least once each year;
 - B. LIHEAP Subrecipients will be monitored at least once every three (3) years (Triennial).
 - C. CSBG Subrecipients will be monitored at least once every three (3) years (Triennial).

6.0 Determining Compliance Requirements

- 6.1 The CMSM section will review Subrecipient's compliance with program requirements, contract provisions and Federal, State, local government rules and regulations.
- A. The CMSM section will determine compliance on specific contract provisions, rules, regulations and/or program requirements are most applicable to be reviewed or required to be reviewed by the funding source. The CMSM section will verify if the Subrecipients have complied with the requirements. The CMSM section will utilize a monitoring tool (instrument) that identifies the areas of compliance that will be reviewed. The monitoring tool will have a methodology to reflect the process used to

determine compliance of each selected contract provision, rule, regulation and/or requirement.

- B. The monitoring tool will be in electronic format and the CMSM section will enter the selected compliance requirements into the document.
- C. The monitoring tool will be maintained in the Department's monitoring software (Teammate).

6.2 The monitoring tool and the list of compliance requirements that are to be reviewed may be revised, updated, or changed from period to period due to program, legislative and/or budget changes.

- A. The listed monitoring tool is reviewed on a continual basis, during the federal fiscal year or Subrecipient program year (as applicable), to account for changes in rules and/or program requirements.

7.0 Monitoring Announcement

7.1 After it has been determined which Subrecipients will be monitored, the CMSM Director will assign monitors, to the Subrecipients who will be monitored. The CMSM Director will determine the method of distributing the Subrecipients to the Monitors.

7.2 After a review of risk factors utilized in previous risk assessments the following factors have been identified by staff consensus as the set of indicators that most accurately present the highest degree of program and fiscal risk:

- ◇ Program Activity Type
- ◇ Number of months remaining on the contract;
- ◇ Time Since Most Recent Monitoring Evaluation of the elapsed length of time since a Subrecipient has received an on-site visit or desk review;
- ◇ Results of previous on-site visit(s) and/or desk review;
- ◇ Total Funds Budgeted – Evaluation of the total amount of funds awarded to a Subrecipient;
- ◇ Total Funds Committed – Evaluation of the percentage of funds committed to the projects of the contract(s);
- ◇ Total Cumulative Draws – Evaluation of the percentage of contract funds drawn;
- ◇ Match obligation for contract;
- ◇ Set-aside Type;
- ◇ Construction Activities – A review to determine if subrecipient's performing activities with a construction component have incurred Davis-Bacon Labor Standards requirements; and
- ◇ Details of any reported complaints (internal and external).

Risk Factors may be revised, updated, or changed from period to period due to program, legislative, or budget changes. *The Risk Factors utilized may also be governed or restricted by constraints inherent in the architecture of the central data base system. It may not be 100% accurate or cost-effective to include some risk factors because of this constraint. An example is Single Audit Status.*

Other Risk Factors may include:

- ◇ Multiple funding sources for a contract;
- ◇ Significant gaps between expected and actual results of previous contracts;
- ◇ Multiple contracts for an individual subrecipient; and
- ◇ Instability in the management environment.

7.3 The Monitor will contact each of the assigned Subrecipients and schedule future on-site monitoring. The Monitor will make every attempt to provide the Subrecipient with a minimum of 30 days' notice prior to the monitoring review.

A. On occasions, the monitoring may occur with fewer than 30 days' notice. Situations that may warrant a monitoring occurring with fewer than 30 days' notice include:

1. The Subrecipient notifies the Department that it is not able to be monitored the proposed week and chooses the monitoring date.
2. The Department receives credible fraud, waste and/or abuse concerns against a Subrecipient requiring little to no notice of the monitoring.
3. The Department receives a credible complaint against a Subrecipient requiring little to no notice of the monitoring.

7.4 After the monitoring date has been confirmed, the Monitor will complete a Monitoring Announcement letter.

7.5 When the announcement letter has been completed, the document will be scanned and saved to the Subrecipient's respective Monitoring file within the computerized Monitoring Software.

7.6 The scanned version will be emailed to the Subrecipient. If applicable, a copy of the announcement letter will be sent to appropriate individuals.

7.7 The Monitoring Announcement letter should be sent to the Subrecipient as soon as the monitoring dates have been set, but no less than two (2) weeks prior to the monitoring.

- 7.8 In some instances a Monitoring Announcement letter may be submitted less than two (2) weeks from the scheduled monitoring. This may occur when 7.2 A (1) is met.
- 7.9 In some instances a Monitoring Announcement letter may not be submitted to the Subrecipient prior to the monitoring. This may occur when 7.2 A (2) and (3) are met.

8.0 Performing the On-site Monitoring

NOTE: Virtual monitoring and desk review of files to occur during the COVID-19 pandemic in place of on-site monitoring.

- 8.1 The CMSM section will utilize electronic monitoring tool to review the selected compliance requirements and to document the Subrecipients compliance with the specific requirement.
- 8.2 If the appropriate Subrecipient staff is available, the Monitor will have an Entrance Conference prior to the start of the monitoring. In the Entrance Conference the Monitor will provide a brief summary of the on-site monitoring process and/or the on-site monitoring plan. The Monitor will also utilize this time to answer Subrecipient questions that are specific to the monitoring and/or the programs.
- 8.4 After the Entrance conference, the Monitor will review the compliance requirements and perform the methodology to determine compliance with the selected requirements. The monitor will complete each question and section of the selected compliance requirements on electronic testing documents. The CMSM section will document the reason for the inability to verify any of the selected compliance requirements.
- A. Weatherization Assistance Program (“WAP”) Monitorings may be performed as a Full Monitoring or as a Unit Inspection.
- a.A Full WAP Monitoring will consist of the Compliance Monitor performing a review to determine compliance with Financial and Expenditure requirements, Administrative requirements, client eligibility requirements and performing an inspection of weatherized units.
- b. Unit Inspection monitoring consists of the Compliance Monitor(s) reviewing weatherization client files for compliance and eligibility requirements and performing an inspection of the weatherized units.
- c. Client file reviews and Unit Inspections will vary according to the funding source used to weatherize the unit. When units are weatherized with LIHEAP funding only, the Compliance Monitor(s) will review the weatherized work

based on an established Priority Rating sheet. When units are weatherized with DOE funding only, or with DOE and LIHEAP funds, the Compliance Monitor(s) will review the weatherized work based on an approved Energy Audit. Compliance Monitors will be required to have all applicable field tests performed during the Unit Inspection. The Compliance Monitor(s) may supervise a Subrecipient's performance of the field test. The Compliance Monitor(s) must document the results of the field tests.

d. The Compliance Monitor will utilize the following as a guide when determining the number of units to inspect. The actual number of units inspected will vary according to the number of QCI staff employed by the Subrecipient and the process the Subrecipient follows for their Assessments and Final Inspections.

- a. When a Compliance Monitor is conducting a monitoring visit, in which the Subrecipient has limited QCI staff therefore the same QCI staff will perform more than one function in the unit, the Compliance Monitor(s) will perform a minimum of:
 - i. Ten percent (10%) unit inspections of the total units completed
- b. When a Compliance Monitor is conducting a monitoring visit, in which the Subrecipient has multiple QCI staff therefore the QCI staff performing the final inspection will not perform any other function in the unit, Compliance Monitor(s) will perform a minimum of:
 - i. Five percent (5%) unit inspections of the total units completed

e. The CMSM Section will be required to monitor a minimum of 5% of all completed weatherized units (at the time of the monitoring) that are funded by DOE and inspected by a QCI who was not involved in the assessment of the weatherized unit. The CMSM Section will monitor a minimum of 10% of all completed weatherized units (at the time of the monitoring) that were inspected by a QCI that was involved in the assessment of the weatherized unit. The CMSM section will utilize the monitoring tracking database to track the number of units that have been inspected. The Department will also review Monthly Expenditure Reports to track the number of total completed units and will adjust the monitoring schedule to ensure that it meets the minimum number of units inspected.

- a. A Compliance Monitor may not be able to monitor the minimum number of weatherized units if:
 - i. the Subrecipient does not have enough completed weatherized units;
 - ii. the geographical location of the weatherized homes prohibits the ability to inspect units;
 - iii. inclement weather persists.

B. Community Services Block Grant

1. A CSBG Monitoring review will consist of the Compliance Monitor performing a review to determine compliance with Financial and Expenditure requirements, Administrative requirements and client eligibility requirements.
2. The monitoring tool's methodology identifies the minimum number of expenditures and client files to review.

C. Comprehensive Energy Assistance Program

1. A CEAP Monitoring review will consist of the Compliance Monitor performing a review to determine compliance with Financial and Expenditure requirements, Administrative requirements and client eligibility requirements.
2. The monitoring tool's methodology identifies the minimum number of expenditures and client files to review.

- 8.5 When the respective methodology is not enough to determine compliance, the Monitor(s) will make every effort to determine if the requirement is compliant. This may require the Monitor(s) to perform additional testing, request additional information or clarification from Subrecipient staff and/or request assistance from peer Monitors, CA Division staff, the CMSM Director or the Chief of Compliance.
- 8.6 The Monitor will obtain and maintain the appropriate documentation to justify any finding, disallowed and/or questioned cost.
- 8.7 The Monitor will notify the CA Trainers of the Subrecipient's need for Training and/or Technical Assistance if necessary.
- 8.8. If the Monitor(s) is unable to complete the monitoring during the specified period, the Monitor(s) must notify the CMSM Director of the circumstance(s) that resulted in the inability to complete the monitoring. The CMSM Director will determine the appropriate course of action to complete the monitoring. The Monitor must notify the Subrecipient that additional time is required to complete the monitoring and of the course of action that was determined by the CMSM Director. The inability to complete the monitoring and the course of action must be documented in the computerized Monitoring Software or the Monitoring Instrument.
- 8.9 Time permitting and if the appropriate Subrecipient staff are available, the Monitor will make every attempt to provide the Subrecipient with an on-site Exit Conference. The Exit Conference is intended to explain, to the Subrecipient, the preliminary results of the monitoring. In some situations the Subrecipient may be provided a few days to submit documentation, if the documentation was not readily available during the onsite visit. In this situation, an Exit conference may not be conducted on-site.

- 8.10 If an on-site exit conference cannot be completed, the Monitor will schedule an Exit conference via conference call. The call will typically occur within 5 business days from the last day the monitoring.
- 8.11 The Monitor(s) will create electronic copies of all applicable monitoring documents and/or Finding support documentation obtained during the review. The Monitor will save the electronic copies to the monitoring file within the computerized Monitoring Software.

9.0 Monitoring Report

- 9.1 The Monitor(s) will be required to develop a report, detailing the results of the monitoring. Each Monitoring Report will contain general program information and/or a brief description of the monitoring process that was performed. If applicable, the monitoring report will contain:
- A. Finding/Deficiency (CSBG only)
 - 1. A brief and concise description of the lack of compliance of a specific program requirement;
 - 2. A brief description of the program requirement;
 - 3. A description of any disallowed or questioned cost; and
 - 4. The respective reference for program compliance.
 - B. Action Required for a Finding/Deficiency
 - 1. A brief requirement for the Subrecipient to meet;
 - 2. A requirement for the Subrecipient to complete a specific action to resolve the finding;
 - 3. A requirement for the Subrecipient to provide a reimbursement, documents, an assurance and/or a response to the monitoring report.
 - C. If there were findings or deficiencies of noncompliance, a 30 calendar day corrective action deadline. If there were no Findings or Required Action, the Monitoring Report will reflect that no response is required and that the Monitoring Review is considered closed.
 - D. A Concern
 - 1. A brief and concise description of the lack of compliance of a specific program requirement;
 - 2. A brief description of the program requirement;

3. The respective reference for program compliance.

E. Action Required for a Concern

1. A brief requirement for the Subrecipient to meet;
2. A requirement for the Subrecipient to complete a specific action to resolve the Concern;

F. Observation

1. A brief and concise description of the policy, practice or procedure observed through the course of monitoring that may lead to a lack of compliance of a specific program requirement.

9.2 Monitors are expected to, on average, complete monitoring letters within 30 calendar days from the last day of the onsite visit. However, DOE-WAP monitoring letters must be completed within 30 calendar days.

9.3 The Monitor(s) will make an electronic copy of the Monitoring Report and save the copy to the Subrecipient's respective monitoring file within the computerized Monitoring Software. The scanned version will be emailed. A hard copy report will be mailed to the Subrecipient if email is not an option.

9.4 At a minimum, the Monitor will e-mail the Monitoring Report to the Subrecipient and a copy of the report to the Subrecipient's Board Chair or the assigned Board representative.

9.5 The date the monitoring report is considered complete and submitted to the Subrecipient, is when the report is emailed to the Subrecipient.

10.0 Response to the Monitoring Report

10.1 The Subrecipient will be provided a 30 day corrective action period which can be extended for good cause by the Chief of Compliance.

10.2 The Monitor(s) is responsible for tracking corrective action due dates. If the Department has not received the Subrecipient's response, the Monitor(s) will submit a letter to the Subrecipient, notifying them of the delinquent response. The Monitor will document that a letter was sent to the Subrecipient, in the "Notes" area of the Monitoring Tracking System.

10.3 If the Subrecipient's response is submitted as a paper document, the Monitor will make an electronic copy of the response. The Monitor will then save the copy to the Subrecipient's respective Monitoring File within the electronic software.

10.4 The Monitor(s) will review the Subrecipient's response to the report for compliance with the specific Finding's required action and program rules, regulations and requirements.

10.5 Within 45 business days of the receipt of the response, the Monitor(s) will provide correspondence to the Subrecipient addressing each Finding and/or required action. For each Finding, the monitor(s) will:

- A. Briefly state the Finding that occurred;
- B. The Subrecipient's response and/or documentation;
- C. Any concern or question posed in the Subrecipient's response;
- D. The results of the Department's review of the response and/or documentation;
- E. Necessary information to address the Subrecipient's concern or question;
- F. If the response and/or documentation is acceptable to resolve the Finding;
- G. If the Finding is resolved;
- H. If applicable, the Finding is closed;
 - i. A Finding will not be considered resolved, but closed when the Department believes the Subrecipient's required action is not obtainable. The Subrecipient will no longer be required to complete the required action.
 - ii. The Department should consider the efforts the Subrecipient made to resolve the Finding.
 - iii. A "Closed" Finding will not be used on the Required Action of a Subrecipient to reimburse the Department for disallowed expenditures.
- I. If applicable, the additional required action to resolve the Finding.

10.6 The Monitor(s) will make an electronic copy of the document addressing the Subrecipient's response to the report. The Monitor will save the copy to the Subrecipient's respective monitoring file in the computerized Monitoring Software. The scanned version will be emailed to the Subrecipient. If applicable, a copy of the document will be sent to appropriate individuals.

10.7 If the Subrecipient's response did not resolve the Findings and/or required actions of the monitoring report, the Monitor(s) will keep abreast of the Subrecipient's 30 day

response period. If the Department has not received the Subrecipient's response, the Monitor(s) will submit a letter to the Subrecipient, notifying them of the delinquent response. The Monitor will document that a letter was sent to the Subrecipient, in the Monitoring Tracking System.

- 10.8 When the Subrecipient submits the response from 10.7, the Monitor(s) will continue at 10.2 of the Monitoring SOP. If the Monitor completes Section 10.5 of the SOP and determines the Subrecipient's response to Finding(s) to remain unresolved, the Monitor will continue with 10.6 and 10.7 of the SOP. However, unless prior approval from the Chief of Compliance, the original Corrective Action deadline is not amended. The Subrecipient must resolve the Finding(s) as soon as possible. If the Department has not received the Subrecipient's response, the Monitor(s) will submit a letter to the Subrecipient, notifying them of the delinquent response. The Monitor will document that a letter was sent to the Subrecipient, in the Monitoring Tracking System.
- 10.9 Similarly, when the Subrecipient submits the response from 10.8, the Monitor(s) will continue at 10.2 of the Monitoring SOP. If the Monitor completes Section 10.5 of the SOP and determines the Subrecipient's response to Finding(s) to remain unresolved, the CMSM Director will notify the Chief of Compliance. The Chief of Compliance may determine if the matter should be referred to the Department's Enforcement Committee in accordance with Department Rules and SOPs.
- 10.10 If a Subrecipient has submitted its second response and is still not able to comply with the required action(s), the Monitor(s) will note in its subsequent correspondence that the Subrecipient is able to request a meeting with the Department's Compliance committee. The Subrecipient may request the committee to review the validity of the Finding or to appeal the required action.
- A. The Subrecipient must include in its subsequent response that it request a meeting with the Compliance committee.
 - B. Once the request has been received, the Department will follow the rules and the SOP's pertaining to the Compliance committee.

APPROVAL:

Earnest Hunt
Compliance Subrecipient Monitoring Director

2/12/2023¹⁹